

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT, IN AND
FOR MIAMI-DADE COUNTY, FLORIDA

OHAD FISHERMAN, an individual,

CASE NO.: _____

Plaintiff,

vs.

THE MCCLATCHY COMPANY,
a Delaware limited liability company,
KORANGY PUBLISHING, INC.,
a New York corporation, WPLG, INC., a
Florida corporation, and SUNBEAM
TELEVISION CORP., a Florida corporation,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff OHAD FISHERMAN (“Plaintiff”), by and through undersigned counsel, sues Defendants THE MCCLATCHY COMPANY, LLC, d/b/a MIAMI HERALD, KORANGY PUBLISHING, INC. d/b/a THE REAL DEAL, WPLG, INC. d/b/a WPLG LOCAL 10 MIAMI, and SUNBEAM TELEVISION CORP. d/b/a WSVN 7 NEWS MIAMI (together, “Defendants”) for publishing multiple false, defamatory, and disparaging statements about Plaintiff. In support, Plaintiff alleges as follows:

NATURE OF DISPUTE

This case involves the outrageous, false, and defamatory statements made by Defendants about Plaintiff that tarnished his character, integrity, and reputation in the community. In December 2024, Oren Alexander, Alon Alexander, and Tal Alexander (the “Alexander Brothers”) were charged by the United States District Attorney’s Office for the Southern District of New York and the Miami-Dade County State Attorney’s Office with multiple sex crimes, including sex

trafficking. Oren and Tal Alexander were two of the most successful and well-known real estate brokers in the world, averaging over a billion dollars in annual sales and representing celebrities and Fortune 500 CEOs. When these charges were published against the Alexander Brothers, a frenzy ensued, and multiple media outlets rushed to cover every aspect of this jaw-dropping story.

In connection with an alleged 2016 New Year's Eve incident—entirely separate from any sex trafficking charges against the Alexander Brothers—Plaintiff was wrongfully charged by the Miami-Dade State Attorney's Office in December 2024 with one count of sexual battery. However, multiple media outlets, including the Defendants in this case, equated the singular charge against Plaintiff as being interwoven with the larger sex-trafficking prosecution against the Alexander Brothers. Indeed, throughout his wrongful prosecution, Defendants published multiple stories about Plaintiff's singular charge, in a deliberate and malicious attempt to intertwine him with the Alexander Brothers' alleged sex-trafficking crimes, which they have now been convicted of. Meanwhile, Plaintiff maintained his innocence, vehemently denying the unsubstantiated allegations against him.

Ultimately, on July 7, 2025, the Miami-Dade County State Attorney's Office withdrew the charges against Plaintiff, stating that “we determined in good faith that we could not prove the case against [Plaintiff] beyond and to the exclusion of all reasonable doubt, which is required by law.”¹ By then, however, the damage suffered by Plaintiff was monumental, and his reputation had been tarnished. Thus, through this action, Plaintiff seeks monetary damages for the substantial harm caused to him by Defendants' outrageous and unlawful conduct.

¹ “Statement From State Attorney Katherine Fernandez Rundle Regarding the Ohad Fisherman Prosecution” MIAMI-DADE COUNTY STATE ATTORNEY'S OFFICE (July 7, 2025) (<https://miamisao.com/press-release/for-immediate-release-statement-from-state-attorney-katherine-fernandez-rundle-regarding-the-ohad-fisherman-prosecution/>) (last visited February 12, 2026).

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff is an individual over the age of 18, is *sui juris*, and resides in Miami-Dade County, Florida.
2. Defendant THE MCCLATCHY COMPANY, LLC, d/b/a Miami Herald (“Miami Herald”) is a Delaware limited liability company, with its principal place of business in Miami, Florida.
3. Defendant KORANGY PUBLISHING, INC. d/b/a THE REAL DEAL (“The Real Deal”) is a New York Corporation.
4. Defendant WPLG, INC. d/b/a WPLG LOCAL 10 MIAMI (“Local 10 News”) is a Florida corporation with its principal place of business in Broward County, Florida.
5. Defendant SUNBEAM TELEVISION CORP. d/b/a WSVN 7 NEWS MIAMI (“7 News Miami”) is a Florida corporation with its principal place of business in Miami-Dade County, Florida.
6. This Court has jurisdiction of this matter as the amount in controversy exceeds the sum or value of fifty thousand dollars (\$50,000.00), exclusive of interest, costs, and attorney’s fees.
7. This Court possesses jurisdiction over Defendants pursuant to Fla. Stat. §§ 48.193(1)(a)(2), (1)(a)(6), and (2).
8. Florida Statute § 48.193(1)(a)(2) confers personal jurisdiction over the Defendants because their conduct, as described in this Complaint, alleges that their tortious conduct caused harm to Plaintiff in Florida.
9. Florida Statute § 48.193(1)(a)(6) confers personal jurisdiction over the Defendants because their conduct harmed Plaintiff while Defendants were engaged in the solicitation and sale of services in Florida.

10. Florida Statute § 48.193(2) confers personal jurisdiction over the Defendants because they maintain a continuous and systematic presence in Florida that generates substantial and not isolated activity in the state.

11. Pursuant to Florida Statutes §§ 47.011 and 47.051, venue is proper in this Court as Plaintiff's causes of action accrued, and Defendants maintain a continuous and systematic presence in Miami-Dade County, Florida.

12. Plaintiff has retained Brito, PLLC to prosecute this action and agreed to pay it a reasonable fee for its services.

13. Plaintiff provided all Defendants with pre-suit notice under Florida Statute § 770.01 at least five business days before filing this action.

14. Thus, all conditions precedent to the filing of this action have been performed, excused, or otherwise waived.

FACTUAL BACKGROUND

A. Plaintiff's background and his business relationship with the Alexander Brothers.

15. Plaintiff is an ultra-luxury real estate broker with a stellar track record in the New York City and South Florida markets.

16. Over his career, Plaintiff has successfully closed millions of dollars in real estate transactions for his clients, including \$29 million at Arte Surfside, which is one of Miami's most exclusive buildings, and over approximately \$70 million since 2020.

17. Plaintiff toiled for nearly two decades to develop his sterling reputation in the real estate industry.

18. Before being charged with multiple sex crimes that derailed their careers and accused them of heinous conduct, Oren and Tal Alexander were among the most successful real

estate brokers in the world, averaging over a billion dollars in sales a year and having celebrities and Fortune 500 CEOs among their roster of clients.

19. After developing their careers at Douglas Elliman, Oren and Tal Alexander decided to leave the firm and open their own brokerage: Official.²

20. Shortly after Official was launched, Plaintiff decided to join the brokerage.

21. However, less than three months later, Plaintiff terminated his employment with Official.

22. Despite multiple reports to the contrary, some of which were published by Defendants, Plaintiff is not a relative of the Alexander family.³

B. The sex-trafficking charges against the Alexander Brothers and the sexual battery charge against Plaintiff.

23. On December 11, 2024, the United States District Attorney's Office for the Southern District of New York⁴ and the Miami-Dade County State Attorney's Office announced charges against the Alexander Brothers for sex trafficking and sexual assault.

² "Douglas Elliman's top brokers Oren and Tal Alexander leave to launch Official with Side" THE REAL DEAL (last updated June 7, 2023) (<https://therealdeal.com/miami/2022/06/07/douglas-ellimans-top-brokers-oren-and-tal-alexander-leave-to-launch-official-with-side/>) (last visited February 12, 2026).

³ "The Alexander Brothers Built an Empire. Their Accusers Say the Foundation was Sexual Violence." VANITY FAIR (March 10, 2025) (<https://www.vanityfair.com/style/story/alexander-brothers-rape-allegations>) ("Oren, Alon, and Tal have maintained their innocence, as has Ohad Fisherman, whose attorney Jeffrey Sloman told *VF* that Fisherman denies the allegations in the state charges as well as Jane Doe's civil case, noting that Fisherman is not a relative of the Alexander brothers.") (last visited February 12, 2026).

⁴ "Alon Alexander, Oren Alexander, And Tal Alexander Charged In Manhattan Federal Court With Sex Trafficking Offenses" UNITED STATES ATTORNEY'S OFFICE SOUTHERN DISTRICT OF NEW YORK (December 11, 2024) (<https://www.justice.gov/usao-sdny/pr/alon-alexander-oren-alexander-and-tal-alexander-charged-manhattan-federal-court-sex>) (last visited February 12, 2026).

24. During her press conference, Katherine Fernandez Rundle, the Miami-Dade County State Attorney, announced a single charge for sexual battery by multiple perpetrators against Plaintiff.⁵

25. The Miami-Dade State Attorney's Office falsely charged Plaintiff with this crime and falsely accused Plaintiff, claiming that he "held the victim down, placed his knees behind the victim's shoulder area, and pinned her arms down onto the bed."⁶

26. The charge against Plaintiff arose from an alleged 2016 New Year's Eve incident in which the Miami-Dade County State Attorney's Office contended that Plaintiff and Oren and Alon Alexander sexually assaulted an unidentified female.

27. However, as explained in detail below, Plaintiff was not present during the alleged 2016 New Year's Eve incident.

28. Plaintiff was never present during the commission of any of the crimes that the Alexander Brothers are accused of.

29. Plaintiff never had any personal knowledge about the commission of any of the crimes that the Alexander Brothers are accused of.

30. As a result, Plaintiff vehemently denied the accusations against him.

C. Defendants' false and defamatory statements about Plaintiff.

31. Shortly after the State Attorney's Office wrongfully charged Plaintiff, Defendants published multiple false and defamatory statements about Plaintiff.

⁵ "Press Conference Local Entrepreneurs Arrested on Sexual Assault Charges" MIAMI-DADE COUNTY STATE ATTORNEY'S OFFICE (December 11, 2024) (<https://miamisao.com/press-release/media-advisory-press-conference-local-entrepreneurs-arrested-on-sexual-assault-charges/>) (last visited February 12, 2026).

⁶ "Sexual battery charge against Ohad Fisherman dropped by prosecutors" WPLG LOCAL 10 YOUTUBE CHANNEL (July 7, 2025) (<https://www.youtube.com/watch?v=MWkDRUR3NrA>) (last visited February 12, 2026).

32. Defendant Miami Herald published these false and defamatory statements about Plaintiff: “That’s because [Plaintiff] took center stage in a case that has caught international attention—the alleged drugging, raping and sex trafficking of dozens of women by wealthy real estate executive brothers Oren, Alon and Tal Alexander.”

33. Defendant Miami Herald’s statements about Plaintiff are false because Plaintiff was not charged by the United States District Attorney’s Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

34. Defendant The Real Deal published multiple false and defamatory statements about Plaintiff across four articles.

a. In the article titled “These are the charges Oren and Alon Alexander face in Miami-Dade,”⁷ The Real Deal published these false and defamatory statements about Plaintiff:

i. “The federal indictment describes years of alleged behavior that amounts to two counts of sex trafficking and one count of conspiracy to commit sex trafficking, but the arrest warrants for the twins and [Plaintiff] cite three separate assaults.”

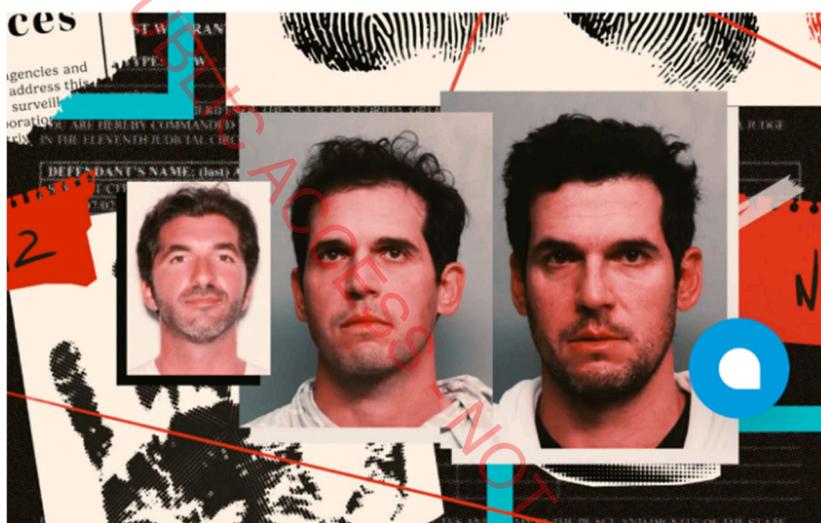
ii. “Their cousin, luxury broker [Plaintiff], was also charged[.]”

iii. Publication of this photograph:

⁷ “These are the charges Oren and Alon Alexander face in Miami-Dade” THE REAL DEAL (December 11, 2024) (<https://therealdeal.com/miami/2024/12/11/alexander-twins-ohad-fisherman-face-sex-battery-charges-in-miami/>) (last visited February 12, 2026).

These are the charges Oren and Alon Alexander face in Miami-Dade

Their cousin, luxury broker Ohad Fisherman, was also charged



A photo illustration of Ohad Fisherman, Alon Alexander and Oren Alexander (Getty, Miami-Dade Corrections and Rehabilitation Department)

- b. In the article titled “ ‘We’re not done’: Feds charge Alexander brothers with sex trafficking,”⁸ The Real Deal published these false and defamatory statements about Plaintiff:
 - i. “The filing alleges that multiple men, including the brothers, participated in the scheme.”

⁸ “ ‘We’re not done’: Feds charge Alexander brothers with sex trafficking” THE REAL DEAL (December 11, 2024) (<https://therealdeal.com/national/2024/12/11/oren-tal-alon-alexander-charged-with-sex-trafficking/>) (last visited February 12, 2026).

ii. Publication of this photograph:

“We’re not done”: Feds charge Alexander brothers with sex trafficking

Feds say Oren, Tal and Alon orchestrated rape, attacks across 20 years, silenced victims



Alon, Oren Alexander and their cousin, Ohad Fisherman

c. In the article titled “From lawsuits to locked up: The Alexanders’ six-month fall,”⁹ The Real Deal published these false and defamatory statements about Plaintiff:

i. “[Plaintiff], who previously worked as an agent with Official and now leads his own brokerage, is an associate of the Alexanders who has not yet responded to a sexual assault charge in Florida.”

ii. Publication of this photograph:

⁹ “From lawsuits to locked up: The Alexanders’ six-month fall” THE REAL DEAL (December 15, 2024) (<https://therealdeal.com/national/2024/12/15/alexander-brothers-charges-lawsuits-six-months/>) (last visited February 12, 2026).

From lawsuits to locked up: The Alexanders' six-month fall

Tal, Oren and Alon brushed off allegations before federal sex trafficking charges



Oren, Tal, Alon Alexander and associate Ohad Fisherman (Getty; Illustration by Kevin Rebang/The Real Deal)

- d. In the article titled “Alexanders”, [Plaintiff’s] defense ramps up in sexual battery case,”¹⁰ The Real Deal published these false and defamatory statements about Plaintiff:
 - i. “The state sexual battery case against Oren and Alon Alexander, and their associate [Plaintiff], is coming into focus.”
 - ii. Publication of this photograph:

¹⁰ “Alexanders’, Fisherman’s defense ramps up in sexual battery case” THE REAL DEAL (last updated on June 12, 2025) (<https://therealdeal.com/miami/2025/06/11/ohad-fisherman-trial-update-on-alexander-sex-battery-case/>) (last visited February 12, 2026).

Alexanders', Fisherman's defense ramps up in sexual battery case

Judge to rule on motion to dismiss next week



Alon Alexander, Ohad Fisherman and Oren Alexander (Getty; Illustration by The Real Deal)

JUN 11, 2025, 4:58 PM EDT
| UPDATED JUN 12, 2025, 1:04 PM EDT

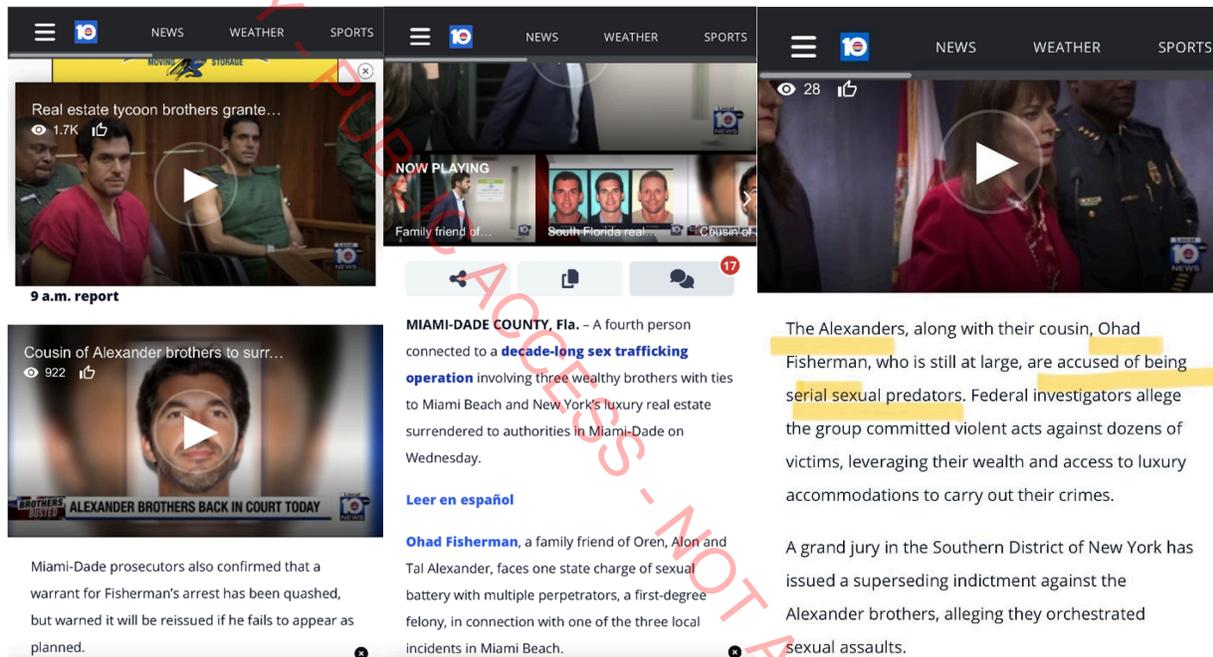
The state sexual battery case against Oren and Alon Alexander, and their associate Ohad Fisherman, is coming into focus.

35. Defendant The Real Deal's statements about Plaintiff are false because Plaintiff is not a relative of the Alexander family, Plaintiff is not an associate (in the criminal context set forth in the article) of the Alexander Brothers, and Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

36. Defendant Local 10 News, in a series of now-deleted articles, published these false and defamatory statements about Plaintiff:

- a. "The Alexanders, along with their cousin, [Plaintiff], who is still at large, are accused of being serial sexual predators."
- b. "Federal investigators allege the group committed violent acts against dozens of victims, leveraging their wealth and access to luxury accommodations to carry out their crimes."

- c. “A fourth person connected a decade-long sex trafficking operation involving three wealthy brothers with ties to Miami Beach and New York’s luxury real estate surrendered to authorities in Miami-Dade on Wednesday.”
- i. Certain of these false and defamatory statements are depicted in these screenshots:



37. Defendant Local 10 News’ statements about Plaintiff are false because Plaintiff is not a relative of the Alexander family, was not the subject of any federal investigation, and was not charged by the United States District Attorney’s Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

38. Defendant 7 News Miami published these false and defamatory statements about Plaintiff:

- a. “Associate of Miami broker brothers allegedly involved in sex trafficking case granted bond[.]”

b. “A week after charges were announced by the State Attorney’s Office, another man tied to a serial rape case in Miami set to turn himself in to police on Wednesday. [Plaintiff], a real estate broker now facing sexual assault charges related to a 2016 New Year’s Eve incident involving Oren and Alon Alexander.”

39. Defendant 7 News Miami’s statements about Plaintiff are false because Plaintiff was not charged by the United States District Attorney’s Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes—and Plaintiff was not charged with serial rape but rather only one count for sexual battery by multiple perpetrators based on an alleged single incident.

D. Miami-Dade County State Attorney’s Office drops the charge against Plaintiff.

40. On July 7, 2025, after receiving evidence of an alibi confirming that Plaintiff was not present during the 2016 New Year’s Eve incident, the Miami-Dade County State Attorney’s office announced that it was withdrawing the charge against Plaintiff.

41. In doing so, the Miami-Dade County State Attorney’s office announced that “we determined in good faith that we could not prove the case against [Plaintiff] beyond and to the exclusion of all reasonable doubt, which is required by law.”¹¹

42. The basis for the withdrawal of the charge against Plaintiff was the revelation that Plaintiff had a credible alibi for the 2016 New Year’s Eve incident that could not be disproven by the Miami-Dade County State Attorney’s office.

¹¹ “Statement From State Attorney Katherine Fernandez Rundle Regarding the Ohad Fisherman Prosecution” MIAMI-DADE COUNTY STATE ATTORNEY’S OFFICE (July 7, 2025) (<https://miamisao.com/press-release/for-immediate-release-statement-from-state-attorney-katherine-fernandez-rundle-regarding-the-ohad-fisherman-prosecution/>) (last visited February 12, 2026).

43. Although Defendants each published an update to the story to report on the dropped charge and Plaintiff's alibi, the above-referenced false and defamatory statements about Plaintiff are still available online.

44. The gist and sting of Defendants' false and defamatory statements about Plaintiff when read in context with the entirety of their articles, conveyed at the time of publication the defamatory meaning that Plaintiff is a co-conspirator of the Alexander Brothers, that he is a relative of the Alexander family, that he was under federal investigation, that he was charged with sex trafficking crimes, and that he was involved in multiple predatory acts over a protracted period of time.

45. As a result of Defendants' unlawful conduct, Plaintiff has suffered considerable financial and reputational harm.

CAUSES OF ACTION

COUNT I—DEFAMATION *PER SE* **(Against Miami Herald)**

46. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

47. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, are false on the grounds that, *inter alia*, Plaintiff was only charged with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office and was not charged by the United States District Attorney's Office for the Southern District of New York with any sex trafficking crime.

48. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, were published to third parties.

49. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, were published negligently because Defendant Miami Herald knew or should have known that Plaintiff was not charged by United States District Attorney's Office for the Southern District of New York with any sex trafficking crime and that Plaintiff was charged only with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office.

50. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, were, alternatively, published with actual malice because Defendant Miami Herald entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

51. Defendant Miami Herald's actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office.

52. Defendant Miami Herald's false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

53. As a direct and proximate result of Defendant Miami Herald publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial financial and reputational harm.

54. Because Defendant Miami Herald's false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant THE MCCLATCHY COMPANY, LLC, d/b/a MIAMI HERALD for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

COUNT II—DEFAMATION PER OUOD
(Against Miami Herald)

55. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

56. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, are false on the grounds that, *inter alia*, Plaintiff was only charged with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office and was not charged by the United States District Attorney's Office for the Southern District of New York with any sex trafficking crime.

57. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, were published to third parties.

58. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, were published negligently because Defendant Miami Herald knew or should have known that Plaintiff was not charged by United States District Attorney's Office for the Southern District of New York with any sex trafficking crime and that Plaintiff was charged only with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office.

59. Defendant Miami Herald's statements about Plaintiff, at paragraph 32 of this Complaint, were, alternatively, published with actual malice because Defendant Miami Herald entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

60. Defendant Miami Herald's actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office.

61. Defendant Miami Herald's false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

62. As a direct and proximate result of Defendant Miami Herald publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial economic harm including but not limited to, lost business opportunities, lost profits, and a significant reduction in annual income.

63. Because Defendant Miami Herald's false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant THE MCCLATCHY COMPANY, LLC, d/b/a MIAMI HERALD for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

COUNT III—DEFAMATION *PER SE*
(Against The Real Deal)

64. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

65. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, are false because, *inter alia*, Plaintiff is not a relative of the Alexander family, Plaintiff is not an associate of the Alexander Brothers (in the criminal context set forth in the article), and Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

66. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, were published to third parties.

67. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, were published negligently because Defendant The Real Deal knew or should have known that Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking, that Plaintiff was charged only with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office, and that Plaintiff is not a relative of the Alexander family.

68. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, were, alternatively, published with actual malice because Defendant The Real Deal entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

69. Defendant The Real Deal's actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander

Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office.

70. Defendant The Real Deal's false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

71. As a direct and proximate result of Defendant The Real Deal publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial financial and reputational harm.

72. Because Defendant The Real Deal's false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant KORANGY PUBLISHING, INC. d/b/a THE REAL DEAL for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

COUNT IV—DEFAMATION PER QUOD
(Against The Real Deal)

73. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

74. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, are false because, *inter alia*, Plaintiff is not a relative of the Alexander family, Plaintiff is not an associate of the Alexander Brothers (in the criminal context set forth in the article), and Plaintiff was not charged by the United States District

Attorney's Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

75. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, were published to third parties.

76. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, were published negligently because Defendant The Real Deal knew or should have known that Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking, that Plaintiff was charged only with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office, and that Plaintiff is not a relative of the Alexander family.

77. Defendant The Real Deal's statements about Plaintiff, at paragraph 34 and all subparagraphs therein of this Complaint, were, alternatively, published with actual malice because Defendant The Real Deal entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

78. Defendant The Real Deal's actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office.

79. Defendant The Real Deal's false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

80. As a direct and proximate result of Defendant The Real Deal publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial economic harm, including but not limited to lost business opportunities, lost profits, and a significant reduction in annual income.

81. Because Defendant The Real Deal's false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant KORANGY PUBLISHING, INC. d/b/a THE REAL DEAL for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

COUNT V—DEFAMATION PER SE
(Against Local 10 News)

82. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

83. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, are false because, *inter alia*, Plaintiff is not a relative of the Alexander family, Plaintiff was not under federal investigation, and Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

84. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, were published to third parties.

85. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, were published negligently because Defendant Local 10 News knew or should have known that Plaintiff was not charged by the United States District

Attorney's Office for the Southern District of New York with sex trafficking, that Plaintiff was charged only with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office, and that Plaintiff is not a relative of the Alexander family.

86. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, were, alternatively, published with actual malice because Defendant Local 10 News entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

87. Defendant Local 10 News' actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office and by failing to verify that Plaintiff is not a relative of the Alexander family.

88. Defendant Local 10 News' false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

89. As a direct and proximate result of Defendant Local 10 News publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial financial and reputational harm.

90. Because Defendant Local 10 News' false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant WPLG, INC. d/b/a WPLG LOCAL 10 MIAMI for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

COUNT VI—DEFAMATION PER QUOD
(Against Local 10 News)

91. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

92. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, are false because, *inter alia*, Plaintiff is not a relative of the Alexander family, Plaintiff was not under federal investigation, and Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

93. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, were published to third parties.

94. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, were published negligently because Defendant Local 10 News knew or should have known that Plaintiff was not under federal investigation, that Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking, that Plaintiff was charged only with a single count of sexual battery by multiple perpetrators by the Miami-Dade County State Attorney's Office, and that Plaintiff is not a relative of the Alexander family.

95. Defendant Local 10 News' statements about Plaintiff, at paragraph 36 and all subparagraphs therein of this Complaint, were, alternatively, published with actual malice because

Defendant Local 10 News entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

96. Defendant Local 10 News' actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office and by failing to verify that Plaintiff is not a relative of the Alexander family.

97. Defendant Local 10 News' false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

98. As a direct and proximate result of Defendant Local 10 News publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial economic harm, including but not limited to lost business opportunities, lost profits, and a significant reduction in annual income.

99. Because Defendant Local 10 News' false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant WPLG, INC. d/b/a WPLG LOCAL 10 MIAMI for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

COUNT VII—DEFAMATION PER SE
(Against 7 News Miami)

100. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

101. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, are false because, *inter alia*, Plaintiff is not an associate of the Alexander Brothers and Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

102. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, were published to third parties.

103. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, were published negligently because Defendant 7 News Miami knew or should have known that Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking.

104. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, were, alternatively, published with actual malice because Defendant 7 News Miami entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

105. Defendant 7 News Miami's actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office.

106. Defendant 7 News Miami's false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

107. As a direct and proximate result of Defendant 7 News Miami's publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial financial and reputational harm.

108. Because Defendant 7 News Miami's false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant SUNBEAM TELEVISION CORP. d/b/a WSVN 7 NEWS MIAMI for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

COUNT VIII—DEFAMATION PER QUOD
(Against 7 News Miami)

109. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 45 as if fully set forth herein.

110. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, are false because, *inter alia*, Plaintiff is not an associate of the Alexander Brothers and Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking—only the Alexander Brothers were charged with those crimes.

111. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, were published to third parties.

112. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, were published negligently because Defendant 7 News Miami knew or should have known that Plaintiff was not charged by the United States District Attorney's Office for the Southern District of New York with sex trafficking.

113. Defendant 7 News Miami's statements about Plaintiff, at paragraph 38 and all subparagraphs therein of this Complaint, were, alternatively, published with actual malice because Defendant 7 News Miami entertained serious doubts about the veracity of the false and defamatory statements about Plaintiff or exhibited reckless disregard as to whether they were true or not.

114. Defendant 7 News Miami's actual malice is exhibited by, *inter alia*, the rush to publish this salacious story by conflating the multiple sex trafficking charges against the Alexander Brothers by the United States District Attorney's Office for the Southern District of New York with the single sexual battery by multiple perpetrators charge against Plaintiff by the Miami-Dade County State Attorney's Office.

115. Defendant 7 News Miami's false and defamatory statements about Plaintiff were not privileged because, *inter alia*, the statements were not a fair and neutral characterization of the single charge against Plaintiff.

116. As a direct and proximate result of Defendant 7 News Miami publishing these false, defamatory, and disparaging statements about Plaintiff, Plaintiff has suffered and continues to suffer substantial economic harm, including but not limited to lost business opportunities, lost profits, and a significant reduction in annual income.

117. Because Defendant 7 News Miami's false and defamatory statements were made with actual malice toward Plaintiff, Plaintiff reserves the right to amend to assert a claim for punitive damages.

WHEREFORE, Plaintiff OHAD FISHERMAN demands judgment against Defendant SUNBEAM TELEVISION CORP. d/b/a WSVN 7 NEWS MIAMI for all damages available under Florida law, court costs, and such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury.

Date: March 13, 2026

Respectfully submitted,

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