

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA**

CASE NO.: 05-2025-CA-53072-XXCA-BC

SEANPAUL REYES,
Plaintiff,

v.

PAUL SIDNEY ALFREY, individually,
Defendant.

COMPLAINT FOR DEFAMATION AND DEFAMATION BY IMPLICATION

Plaintiff, SeanPaul Reyes ('Plaintiff'), sues Paul Sidney Alfrey ('Defendant'), and alleges as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff is a citizen and resident of the State of New York. He is an independent investigative journalist and the founder of Long Island Audit Inc., with a substantial national and Florida following.
2. Defendant, Paul Sidney Alfrey, is the elected Mayor of the City of Melbourne, Brevard County, Florida. At all times material, Defendant acted personally in publishing the statements described herein.
3. This Court has subject-matter jurisdiction because the amount in controversy exceeds \$50,000, exclusive of interest, costs, and attorney's fees.
4. Venue is proper in Brevard County, Florida, because the cause of action arose there and the defamatory statements were published there.

FACTUAL ALLEGATIONS



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RACHEL M. SADDON

5. On or about September 27, 2025, at approximately 6:00 a.m., Defendant published a written statement on his official Mayor Paul Sidney Alfrey Facebook page, a government-associated platform he uses to communicate with the public (see Exhibit A).
6. In that post, Defendant wrote: “the harassment and death threats from him and his followers are unacceptable and will not be tolerated...”
7. Defendant coupled this statement with screenshots of vile messages purportedly authored by unidentified individuals. None of those messages were authored or directed by Plaintiff.
8. By the plain and ordinary meaning of the words, Defendant’s post expressly and unambiguously accused Plaintiff of personally sending 'death threats.'
9. Plaintiff has never sent Defendant a death threat or any threatening message whatsoever.
10. Defendant’s statement is false and was made with actual malice, as Defendant knew Plaintiff had not sent any such messages or, at a minimum, acted with reckless disregard for the truth.
11. On September 27, 2025, at approximately 2:30 p.m., Plaintiff sent Defendant a formal Defamation Retraction Demand Letter and Litigation Hold Notice (see Exhibit B) giving Defendant 48 hours to remove the post and issue a public correction.
12. Defendant failed and refused to issue any retraction, correction, clarification, or apology, and the defamatory post remained publicly visible well beyond the 48-hour period.
13. Defendant’s failure to retract or correct the false statement further evidences actual malice and intentional disregard for the truth.
14. Defendant’s publication was disseminated to thousands of readers, shared and reposted widely, and remains accessible on the internet.
15. Defendant’s statement constitutes defamation per se, as it falsely accuses Plaintiff of committing a serious criminal act—making death threats against a public official—in violation of Fla. Stat. § 836.10.
16. Defendant’s pairing of Plaintiff’s name with third-party messages also created a false and defamatory implication that Plaintiff authored, encouraged, or coordinated the threats.

17. Defendant's statements and implications have caused Plaintiff severe harm, including reputational damage, emotional distress, and economic losses, including diminished goodwill with his audience and sponsors.

18. Defendant's conduct was intentional, malicious, and willful, warranting an award of punitive damages.

COUNT I – DEFAMATION (Against Defendant Paul Sidney Alfrey, Individually)

19. Plaintiff realleges and incorporates paragraphs 1–18 as if fully set forth herein.

20. Defendant published false statements of fact concerning Plaintiff to third parties.

21. Such statements were defamatory per se, as they imputed serious criminal conduct—sending death threats—to Plaintiff.

22. Plaintiff can and will prove that Defendant acted with actual malice.

23. Defendant's continued publication and refusal to retract after notice further demonstrate reckless disregard for the truth.

24. As a direct and proximate result, Plaintiff suffered reputational, emotional, and financial damages.

25. Defendant's conduct was willful, malicious, and outrageous, entitling Plaintiff to punitive damages.

COUNT II – DEFAMATION BY IMPLICATION (Against Defendant Paul Sidney Alfrey, Individually)

26. Plaintiff realleges and incorporates paragraphs 1–18 as if fully set forth herein.

27. Defendant's juxtaposition of Plaintiff's name with screenshots of threatening messages created the false and defamatory implication that Plaintiff authored or instigated those threats.

28. Defendant published and maintained that implication with actual malice.

29. Plaintiff suffered damages as described above.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in his favor and against Defendant, awarding: (a) compensatory damages in excess of \$50,000; (b) punitive damages; (c) pre- and post-judgment interest; (d) costs of this action; and (e) such other relief as the Court deems just and proper.

JURY TRIAL DEMAND

Plaintiff demands trial by jury on all issues so triable.

Filed this 13th day of October, 2025.

Respectfully submitted,



SeanPaul Reyes
Plaintiff, Pro Se
66 S. Village Dr.
Bellport, NY 11713
Email: LongIslandAudit@gmail.com

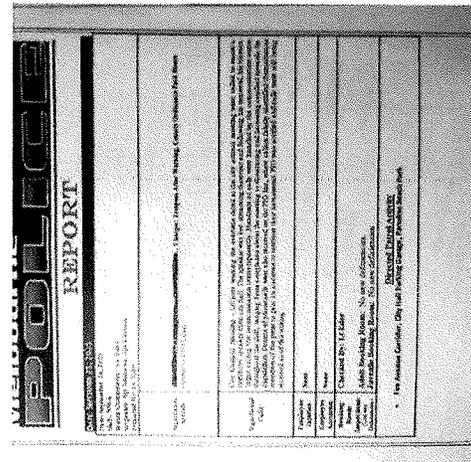
EXHIBIT A

Defamatory Facebook Post by Mayor Paul Sidney Alfrey (September 27, 2025)

[Exhibit to be attached by Plaintiff prior to filing]

Unfortunately the YouTuber is getting his information from the person who brought him here and in my personal business dispute. She is not being honest with him and has a history of prior false reports, including falsely reporting a truck stolen and abandoning her dog at our Brevard County animal shelter claiming it was a found stray. (Animal ID#1000523)

I want to be clear! His Free speech was not denied and our meeting rules were followed and enforced fairly. The harassment and death threats from him and his followers are unacceptable and will not be tolerated against me and my family, nor our public safety professionals.



Piotr Pankiewicz

4:46 AM

whats up faggot :))

i hope u will die soon :))

Menty Singh Yadav 10:27 PM

Coffin time pussy pig ass

Mother fucker you wife is whore

10 dollars a night whore

asshole t with [Proton Mail](#) secure email.

qutar To You

ATTENTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

6:38

M J To You

6:3

ATTENTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

UCKING piece of shit die in cancer

Out-of-Town Youtuber Was NOT Denied Free Speech

As many people may be aware from social media, a YouTuber from New York—who makes a living by claiming his First Amendment rights were violated—is falsely alleging that his free speech was denied here in Melbourne. This is completely untrue.

The YouTuber claims he was removed from our City Council meeting for "exposing a corrupt Mayor." That is misleading rhetoric designed to grab headlines. In fact, our Council rules clearly state: "Do not address the Mayor or Council Member individually." Despite this, when he directed allegations at me personally, I still allowed him to fully speak for his allotted three minutes.

When his time expired, he attempted to demand that speaking time be transferred from another person—something not permitted under the rules. The card he signed up with clearly outlines this policy.

After his three minutes concluded, he became disruptive, arguing with law enforcement officers, and creating a disturbance for the sake of his YouTube channel. At that point, he was removed so the Council could continue City business.

Unfortunately, his actions have resulted in hundreds of harassing calls to our police dispatchers, as well as death threats directed at me personally. Some of those threats are attached here.

He has also spread misinformation regarding my personal and professional integrity. Specifically, he falsely alleged that I used my late brother's personal credit card. In reality, the card in question is a company business credit card for which I am solely responsible. Any personal charges on that card are covered by me.

Unfortunately the YouTuber is getting his information from the person who brought him here and in my personal business dispute. She is not being honest with him and has a

EXHIBIT B

Defamation Retraction Demand Letter (September 27, 2025, sent at approximately 2:30 p.m.)

[Exhibit to be attached by Plaintiff prior to filing]

Subject: Demand for Retraction/Correction and Preservation of Evidence — False Statement that I Sent “Death Threats”

To: Mayor Paul Alfrey

Cc: City Attorney, City of Melbourne, FL

Mayor Alfrey,

I write regarding the statement you published on your official Facebook page on September 27, 2025, at approximately 6:00 AM concerning my appearance at the Melbourne City Council meeting. In that post, you stated (emphasis added): “the harassment and death threats from him and his followers are unacceptable and will not be tolerated...” You then embedded screenshots of vile messages purportedly sent by third parties.

That statement asserts, or at minimum clearly implies, that I personally sent you death threats. That is false. I have never sent you a death threat or any threatening message. Your publication is a verifiably false factual accusation of serious criminal conduct and is inherently defamatory. Pairing that accusation with screenshots of messages from other people compounds the false impression that I authored or orchestrated them.

Demand for Relief (48 hours):

1. Remove the defamatory post from all platforms where you published or reposted it.
2. Publish a clear, pinned correction on the same page(s)/channel(s), for at least 30 days, stating:
 - that your prior post incorrectly stated or implied that SeanPaul Reyes sent you death threats;
 - that Mr. Reyes did not send you any death threat; and
 - that the screenshots you posted were not authored by Mr. Reyes.
3. Confirm in writing within 48 hours that you have taken the above steps.

Litigation Hold: Effective immediately, preserve all evidence relating to the post and to any claims you’ve made about me, including without limitation: drafts, edits, comments, reactions, shares, messages, emails, metadata, IP logs, screenshots, and communications with City personnel or third parties. Do not delete, alter, or overwrite any such material.

Nothing in this letter waives any rights, remedies, or damages I may pursue. If you decline to timely correct the record, I will consider all appropriate legal options.

You may send your written confirmation and any questions to the contact information below.

Sincerely,

SeanPaul Reyes

Founder, Long Island Audit Inc.

Email: LongIslandAudit@gmail.com