

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT  
CIVIL ACTION NO.

22-1835 B

EAST COAST PRINTING, INC.,

Plaintiff,

v.

JIM LYONS AND MASSACHUSETTS REPUBLICAN  
PARTY,

Defendants.

VERIFIED COMPLAINT AND  
DEMAND FOR JURY TRIAL

SUFFOLK SUPERIOR COURT  
CIVIL CLERK'S OFFICE  
2022 AUG 10 P 2:53  
MICHAEL JOSEPH DONOVAN  
CLERK / MAGISTRATE

**PARTIES**

1. Plaintiff, East Coast Printing, Inc. ("Plaintiff" or "East Coast"), is a domestic corporation with its principal office located at 2 Keith Way, Hingham, County of Plymouth, Commonwealth of Massachusetts.

2. Defendant, Jim Lyons ("Defendant Lyons"), is the Chairman of Defendant, Massachusetts Republican Party, a domestic non-profit organization located at 400 West Cummings Park, Suite 5650, Woburn, Massachusetts.

3. Defendant, Massachusetts Republican Party ("MassGOP"), a domestic non-profit organization located at 400 West Cummings Park, Suite 5650, Woburn, Massachusetts.

**STATEMENT OF FACTS**

4. East Coast reaffirms and realleges the allegations contained in paragraphs 1 through 3 and incorporates them herein by reference.

5. Until recently, East Coast has worked closely with MassGOP and its candidates for many years. (Affidavit of Louis Silva at ¶ 2, attached hereto as "Exhibit A")

6. East Coast derives significant economic benefits from its relationships with, and work for, MassGOP candidates. (Affidavit of Louis Silva at ¶ 3)

7. Throughout the course of East Coast's relationship with MassGOP and its candidates, East Coast has demonstrated an excellent track record. Time and again, East Coast has proven that it can and will perform to the highest standards. East Coast's commitment to excellence and dependability are especially evident in times of need; and whenever MassGOP candidates need last minute mailers, East Coast always delivers on time. (Affidavit of Louis Silva at ¶ 4)

8. On or about June 2, 2022, one of East Coast's long standing clients informed Louis Silva, President of East Coast Printing, Inc. ("Mr. Silva"), that East Coast is no longer allowed to use the MassGOP non-profit postage permit or participate in MassGOP's Coordinated Mail Program. (Affidavit of Louis Silva at ¶ 5)

9. Defendant Lyons, Chairman of MassGOP, has banned MassGOP candidates from working with East Coast by prohibiting East Coast's participation in MassGOP's Coordinated Mail Program. (Affidavit of Louis Silva at ¶ 6)

10. Defendant Lyons is using his position of authority to retaliate against East Coast for a perceived slight because one of East Coast's junior employees, Mike, was copied on an email thread to which Sean Powers and Matt Sisk – two (2) individuals with whom Defendant Lyons has a personal dispute – replied all. (Affidavit of Louis Silva at ¶ 7)

11. East Coast's junior employee, Mike, was not an active participant on the subject email thread and is not affiliated – politically or otherwise – with Sean Powers or Matt Sisk. (Affidavit of Louis Silva at ¶ 8)

12. Neither East Coast, nor its junior employee, Mike, have any connection with Defendant Lyon's personal dispute with Sean Powers and Matt Sisk. (Affidavit of Louis Silva at ¶ 9)

13. Defendant Lyons' deliberate interference with East Coast's business relationships with MassGOP candidates has had, and continues to have, detrimental consequences including economic loss and damage to East Coast's reputation. For example, as recent as July 8, 2022, Elizabeth Groot, Executive Assistant, MassGOP, responded to an email from Representative David DeCoste's Campaign stating "Sorry, MassGOP will not work with East Coast Printing," even though Representative David DeCoste's Campaign has "historically worked with East Coast Printing." (Affidavit of Louis Silva at ¶ 10)

14. John Milligan, also of the MassGOP, has informed Republican candidates that East Coast is not allowed to participate in the Coordinated Mail Program through MassGOP. (Affidavit of Louis Silva at ¶ 11)

#### CAUSES OF ACTION

#### COUNT I – DEFAMATION

15. East Coast reaffirms and realleges the allegations contained in paragraphs 1 through 14 and incorporate them herein by reference.

16. Defendants, Jim Lyons' and the Massachusetts Republican Party's ("Defendants"), statements are false and untrue, and defamed East Coast.

17. By sharing the statements with MassGOP candidates, Defendants published defamatory statements.

18. Defendants negligently published false and defamatory statements about East Coast, causing it to suffer damages, including economic loss and injury to reputation.

19. Defendants published the false and defamatory statements with the knowledge that the statements were false, or with reckless disregard as to the falsity of the statements.

20. Defendants' defamatory statements injured the reputation of East Coast.

COUNT II – COMMERCIAL DISPARAGEMENT

21. East Coast reaffirms and realleges the allegations contained in paragraphs 1 through 20 and incorporates them herein by reference.

22. Defendants' statements were false and untrue, and disparaged East Coast's services and business.

23. By telling the statements to MassGOP candidates, Defendants published the disparaging statements to one or more people.

24. Defendants negligently published the false and disparaging statements concerning East Coast's services, causing harm to East Coast's reputation.

25. Defendants published the false and disparaging statements about East Coast, causing East Coast to suffer special and general damages, including the monetary loss of important and valuable clients, including but not limited to MassGOP candidates, and injury to the reputation of East Coast.

26. Defendants published the false and disparaging statements with the knowledge that the statements were false, or with reckless disregard as to the falsity of the statements.

27. As a result of Defendants' disparagement of East Coast, East Coast has suffered economic loss and injury to its reputation.

COUNT III – INTENTIONAL INTERFERENCE WITH ADVANTAGEOUS BUSINESS RELATIONS

28. East Coast reaffirms and realleges the allegations contained in paragraphs 1 through 27 and incorporates them herein by reference.

29. East Coast was involved in ongoing, valid, and existing business relationships with MassGOP candidates.

30. East Coast had the valid and reasonable expectation that it would derive future economic benefits from its relationships with MassGOP candidates.

31. Defendants knew of the relationships between East Coast and MassGOP candidates.

32. Defendants intentionally disrupted the relationships between East Coast and MassGOP candidates with the express purpose to harm East Coast, engaging in wrongful conduct, including prohibiting East Coast from participating in the Coordinated Mail Program and publishing defamatory and disparaging statements concerning East Coast.

33. Defendants' conduct was undertaken wholly without privilege or justification.

34. As a result of Defendants' intentional acts, the business relationships between East Coast and MassGOP candidates were disrupted in that MassGOP candidates were not permitted to do business with East Coast and East Coast was excluded from the Coordinated Mail Program.

35. Defendants' interference with the business relationships between East Coast and MassGOP candidates has resulted in damages to East Coast including economic loss.

36. Defendants acted maliciously and wantonly in interfering with the business relationships between East Coast and MassGOP candidates.

37. As a result of Defendants' intentional interference, which was improper in motive and means, East Coast has been caused to suffer damages, including economic loss.

COUNT IV – VIOLATION OF M.G.L. C. 93A, §11

38. East Coast reaffirms and realleges the allegations contained in paragraphs 1 through 37 and incorporates them herein by reference.

39. Defendants are engaged in trade or commerce within the Commonwealth of Massachusetts.

40. Defendant Lyons has made false and misleading statements concerning East Coast's business.

41. MassGOP, through its agents, employees and/or representatives, Jim Lyons, Elizabeth Groot and John Milligan, informed MassGOP candidates that MassGOP will not work with East Coast and East Coast is not allowed to participate in the Coordinated Mail Program.

42. Defendants, without justification, have excluded East Coast from participation in its Coordinated Mail Program.

43. East Coast has requested Defendants allow candidates to work with East Coast and authorize East Coast to participate in the Coordinated Mail Program.

44. Defendants have failed and refused to allow candidates to work with East Coast and authorize East Coast to participate in the Coordinated Mail Program.

45. By the foregoing, Defendants have engaged in unfair methods of competition and unfair and deceptive trade practices in violation of Sections 2 and 11 of Chapter 93A of the Massachusetts General Laws.

46. Such actions were, and are, intentional and undertaken willfully and knowingly, and have caused proximate damage to East Coast in violation of M.G.L. c. 93A, §11.

47. As a result of the foregoing, East Coast has been caused to suffered damages by injury, plus multiple damages and attorney's fees.

PRAYER FOR RELIEF

WHEREFORE, East Coast respectfully requests that the Court:

- A. Enter judgment against Defendants on all counts of the Complaint

- B. Enter judgment in favor of East Coast against Defendant in such amount as the Court deems appropriate and just in light of all the circumstances;
- C. Enter judgment in favor of East Coast against Defendant in an amount equal to up to three times the amount of their actual damages sustained, together with costs, interest and attorney's fees; and
- D. Award all such other and further relief as the Court deems just and appropriate.


DEMAND FOR JURY TRIAL

East Coast hereby demands a trial by jury on all claims and issues so triable.

**VERIFICATION**

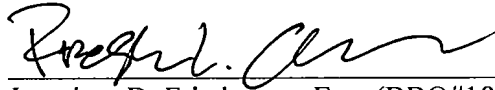
I, Louis Silva, under the pains and penalties of perjury, hereby depose and say that I am the President of Plaintiff, East Coast Printing, Inc., in the above captioned action and that I have read the allegations in the foregoing Verified Complaint and, as to each statement of fact alleged therein, I hereby affirm and verify that I have actual knowledge of each such fact and that such fact is true, except as to matters specifically alleged on information and belief, which I believe to be true.

Signed under the pains and penalties of perjury on this 10<sup>th</sup> day of August, 2022.

  
Lou Silva (Aug 10, 2022 10:38 EDT)

Lou Silva

Respectfully submitted,  
Plaintiff,  
East Coast Printing, Inc.,  
By its attorneys,



Jonathon D. Friedmann, Esq. (BBO#180130)  
Preston L. Clinton (BBO#: 690373)  
RUDOLPH FRIEDMANN LLP  
92 State Street  
Boston, MA 02109  
Tel: (617) 723-7700  
Fax: (617) 227-0313  
jfriedmann@rflawyers.com  
pclinton@rflawyers.com

DATED: August 10, 2022