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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CIVIL ACTION NO.:

JAMES LYONS,
Plaintiff,

v.

JIM CONROY, BEN MAROON,
MATTHEW SISK, MARK
STEFFAN, SEAN POWERS, and
BRIAN WYNNE,
Defendants.

COMPLAINT

PARTIES

1. The plaintiff, James Lyons, resides at 12 High Vale Lane, Town of Andover, County of Essex, Commonwealth of Massachusetts.
2. The defendant, Jim Conroy, resides at 117 Temple Road, City of Waltham, County of Middlesex, Commonwealth of Massachusetts.
3. The defendant, Ben Maroon, resides at 258 Allston Street, Apartment C, City of Brighton, County of Suffolk, Commonwealth of Massachusetts.
4. The defendant, Matthew Sisk, resides at 9 Canavan Drive, Town of Braintree, County of Norfolk, Commonwealth of Massachusetts.
5. The defendant, Mark Steffan, resides at 120 Montgomery Street, Apartment 3, City of Cambridge, County of Middlesex, Commonwealth of Massachusetts.
6. The defendant, Sean Powers, resides at 380 Hancock Street, Town of Braintree, County of Norfolk, Commonwealth of Massachusetts.
7. The defendant, Brian Wynne, resides at 100 Sudbury Street, Unit 3507, City of Boston, County of Suffolk, Commonwealth of Massachusetts.
8. The defendants, Jim Conroy, Ben Maroon, Matthew Sisk, Mark Steffan, Sean Powers, and Brian Wynne are herein after referred to as "The Team."

FACTS

9. On or about, January 17, 2019, the plaintiff, James Lyons, was elected as chairman of the Massachusetts Republican Party.
10. On or about, April 4, 2019, the Red Massachusetts Grassroots Action LLC was formed.
11. The Red Massachusetts Grassroots Action LLC was led by the defendant Brian Wynne.
12. On or about, January 3, 2021, the plaintiff, James Lyons was reelected as chairman of the Massachusetts GOP.
13. On or about January 27, 2021, the Massachusetts GOP began receiving Boston Republican Ward 15 formation forms via United States Postal Service (USPS) and United Postal Service (UPS). Upon review of the formation forms, it was discovered that the residences of individuals listed in the ward formation forms failed to match the addresses that were listed in the sworn documents that were submitted to the Office of Campaign and Political Finance. Upon review it was discovered that the mailings had a return address under the name of the defendant Mark Steffan.
14. On or about April 2021, The Team retained legal counsel in an attempt to portray in the public and the press a false narrative that portrayed the plaintiff, James Lyon, as a racist and a bigot.
15. On or about April 26, 2021, this false narrative was released to the Boston Globe to be distributed to the public.
16. On or about April 19, 2021, counsel for The Team reviewed emails from the defendant, Brian Wynne, regarding planning further defamatory remarks in an effort to defame the plaintiff.
17. On or about April 19, 2021, The Team implemented a plan to defame the plaintiff by publicizing a false narrative that the plaintiff was a racist, a bigot and anti-Asian, all in an effort to destroy Mr. Lyon's reputation.
18. On or about April 26, 2021, evidence was revealed that confirms that the false narrative of the plaintiff, James Lyons, being a racist and a bigot, was approved by the defendants Matthew Sisk and Jim Conroy.
19. On or about November 9, 2021, State Committeewoman Amy Carnevale sent a letter to David Carr and copied "The Team" on the letter.
20. On or about December 15, 2021, Douglas Bennett, testified under oath during his deposition, that he was retained by the defendant, Brian Wynne, through Red Massachusetts Grassroots Action LLC, to work on political campaigns.

21. On or about December 15, 2021, Douglas Bennett testified under oath during his deposition that he was paid by the defendant, Brian Wynne, through Red Massachusetts Grassroots Action LLC, to work on political campaigns.
22. Douglas Bennett has repeatedly defamed the plaintiff while he was working for, and at the direction of, Red Massachusetts Action LL, which was run and controlled by The Team.
23. The Team instructed and was directly responsible for the defamation of the plaintiff by Bennett.
24. As a result of the defamation by the defendants, the plaintiff has been harmed financially and personally and has been held in low esteem by the public who heard or read the defamatory statements orchestrated by the defendants.

CAUSES OF ACTION

(Each Cause of Action specifically incorporates by reference all of those paragraphs previously set forth.)

Jim Conroy, Ben Maroon, Matthew Sisk, Mark Steffan, Sean Powers, Brian Wynne

FIRST CAUSE OF ACTION

25. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Jim Conroy, for defamation.

SECOND CAUSE OF ACTION

26. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Ben Maroon, for defamation.

THIRD CAUSE OF ACTION

27. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Matthew Sisk, for defamation.

FOURTH CAUSE OF ACTION

28. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Mark Steffan, for defamation.

FIFTH CAUSE OF ACTION

29. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Sean Powers, for defamation.

SIXTH CAUSE OF ACTION

30. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Brian Wynne, for defamation.

SEVENTH CAUSE OF ACTION

31. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Jim Conroy, for defamation *per se*.

EIGHTH CAUSE OF ACTION

32. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Ben Maroon, for defamation *per se*.

NINTH CAUSE OF ACTION

33. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Matthew Sisk, for defamation *per se*.

TENTH CAUSE OF ACTION

34. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Mark Steffan, for defamation *per se*.

ELEVENTH CAUSE OF ACTION

35. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Sean Powers, for defamation *per se*.

TWELFTH CAUSE OF ACTION

36. This is a cause of action brought by the plaintiff, James Lyons, against the defendant, Brian Wynne *per se*.

DEMANDS FOR RELIEF

A. As to the First Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Jim Conroy, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.

- B. As to the Second Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Ben Maroon, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- C. As to the Third Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Matthew Sisk, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- D. As to the Fourth Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Mark Steffan, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- E. As to the Fifth Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Sean Powers, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- F. As to the Sixth Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Brian Wynne, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- G. As to the Seventh Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Jim Conroy, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- H. As to the Eighth Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Ben Maroon, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- I. As to the Ninth Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Matthew Sisk, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- J. As to the Tenth Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Mark Steffan, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.

- K. As to the Eleventh Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Sean Powers, in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.
- L. As to the Twelfth Cause of Action, the plaintiff, James Lyons, demands judgment against the defendant, Brian Wynne in the amount of his damages together with the interests and costs of this action and injunctive relief in the form of the ordered retraction of the defamatory statement.

JURY CLAIM

The plaintiff claims a trial by Jury.

The Plaintiff,
By His Attorneys:

/s/ Michael K. Gillis

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