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1 21. Defendant therefore also had knowledge of the existence of prospective contractual relations
2 between CSD and third parties prior to her actions.

3 22. Defendant has made repeated and numerous false statements, after having met with Mr.
4 Kennedy and CSD representatives and therefore with knowledge as to the falsity of said statements,
5 to homeowners in the potentially affected communities as to the impacts to the communities of
6 CSD's business, Mr. Kennedy's criminal background, and Mr. Kennedy's fitness for a particular
7 business.

8 23. Defendant made these false statements with the intent of denying the project the necessary
9 community endorsements, interfering with CSD's existing and prospective contractual relations, and
10 denying CSD the project any chance of success.

11 **FIRST CLAIM FOR RELIEF**

12 **(Intentional Interference with Contractual Relations - CSD)**

13 24. Plaintiffs repeat and reallege each and every allegation contained in the preceding
14 paragraphs of this complaint as though fully set forth herein.

15 25. Valid contracts exist between CSD and third parties.

16 26. Defendant knew of the existence of these contracts as a result of her August 2010 meeting
17 with CSD representatives and Mr. Kennedy.

18 27. Defendant committed intentional acts, including but not necessarily limited to false
19 statements about the project, designed to disrupt these contractual relationships.

20 28. These contractual relationships have actually been disrupted as a result of Defendant's
21 intentional misconduct.

22 29. CSD has sustained damages in excess of \$10,000.00 as a result of these interferences.

23 30. CSD has been compelled to retain attorneys to prosecute this action and is entitled to
24 reasonable attorneys' fees, costs, and expenses incurred herein.

25 **SECOND CLAIM FOR RELIEF**

26 **(Intentional Interference with Prospective Economic Advantage - CSD)**

27 31. Plaintiffs repeat and reallege each and every allegation contained in the preceding
28 paragraphs of this complaint as though fully set forth herein.