

**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA
CIVIL DIVISION
CASE NO.**

**BARBARA SHARIEF,
Plaintiff,**

vs.

**LAUREN BOOK, and
WINNING FLORIDA,**

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff **DR. BARBARA SHARIEF** (“SHARIEF”) files this Complaint and sues **LAUREN BOOK** (“BOOK”) and **WINNING FLORIDA** (collectively “Defendants”) for defamation and damages, seeks a trial by jury, and states:

INTRODUCTION

Defendants **LAUREN BOOK**, both individually and through entities that she and her agents direct, have shamelessly and relentless disseminated lies to people falsely suggesting that **DR. BARBARA SHARIEF** “defrauded Medicaid” “admitted guilt” and that she stole tax payer money. **BOOK** has done this both in her own words, in videos and interviews and through political organizations that she controls. **LAUREN BOOK** knows full well that these statements are despicable lies. **DR. BARBARA SHARIEF** has **NEVER** committed a crime in her life and neither she

nor any company that she has ever operated has ever been found to have stolen or misspent Medicaid or any other funds. Quite the opposite. MS. BOOK and her nefarious team of defamers know for a fact that these slanderous statements are lies. MS. BOOK must be held accountable for her unethical spreading of false information purely for selfish political gain at the expense of a self-made public servant who has earned everything she has through honesty and hard work.

1. This is an action seeking damages exceeding \$1,000,000.00 and other relief by Plaintiff for libel and defamation to Plaintiff, her reputation, and her family's good name.

2. Plaintiff is a Broward County resident.

3. Defendant LAUREN BOOK is a Broward County resident and is otherwise *sui juris*.

4. Plaintiff, DR. BARBARA SHARIEF, is the former mayor of Broward County, a public servant, entrepreneur, author, certified healthcare professional and gun safety advocate.

5. Born and raised in South Florida, Plaintiff loves to serve her community, speak up for those who don't have a voice, and is passionate about leading Florida into the future.

6. Plaintiff is a lifelong public servant with an impeccable reputation within her community.

7. Plaintiff has been involved in her community, is an advocate for the residents and businesses in Florida and is devoted to service to the public.

8. At a young age, SHARIEF lost her father to gun violence. A small business owner who was well known in his community for helping those in need, he was shot and killed by a teenage robber. To help her family cover expenses, then 14 year old Barbara went to work. This experience and her father's example instilled in her a strong work ethic and a drive to help others any way she could.

9. In this spirit, she chose to go into the field of nursing after graduating high school. Now a certified medical professional with 25+ years of medical experience, SHARIEF holds multiple degrees in Nursing, including a Bachelor of Science in Nursing (BSN), Master of Science in Nursing (MSN), and a Doctor of Nursing Practice (DNP). She is also a certified Advanced Registered Nurse Practitioner (APRN).

10. In 2001, she founded South Florida Pediatric Homecare, Inc., South Florida's premier homecare agency for children and adults with medically complex needs.

11. In 2009, after active involvement in her community as a business owner and parent, SHARIEF was spurred on to do something more. She ran and was elected to the Miramar City Commission. She later became Miramar's Vice Mayor and was elected to the Broward County Commission representing District 8. In 2014, she

broke barriers when she was appointed as the first African-American Mayor of Broward County and was honored to be re-appointed in 2016. She was also the first black female President of the Florida Association of Counties, where she advocated for all 67 counties in Florida.

12. During her tenure as Broward County Mayor, SHARIEF fought for affordable healthcare, mortgage and foreclosure relief, solutions for homelessness, and for entrepreneurial/small business assistance and mentoring programs.

13. In 2017, during her second term, two tragedies struck the people of Broward County. As County Mayor, SHARIEF led the response to the horrendous shooting at Ft. Lauderdale International Airport and oversaw the recovery effort after the destruction of Hurricane Irma. As a result, she created a stronger and safer community for years to come.

14. As the mother of three children, everything SHARIEF has done has been aimed at building a better and brighter future for South Floridians. Throughout her years of public service, she has demonstrated this commitment time and time again through initiatives such as generating a projected \$130 billion for transportation and infrastructure improvement projects over a 30-year period in Broward County and leading the passing of the Broward County transportation surtax initiative.

15. SHARIEF also serves as Chair on the Opioid Lawsuit Task Force, is a member of the Pompano Beach Community Advisory Board and has been on the Broward Metropolitan Transportation Committee for the last 13 years.

16. SHARIEF continues to advocate for economic stability through job creation, small business support, affordable healthcare, tourism, neighborhood revitalization, education, and quality care for the elderly, veterans, children, and gun safety regulation. She is one of the featured authors in the August 2021 book, No Glory Without a Story, an inspirational collection of stories and lessons learned by entrepreneurs and leaders in their field about the trials, tribulations, sacrifices, and successes of owning your own business.

17. Defendant BOOK is the current State Senator of Florida and is a current candidate for the 35th Senate District running against SHARIEF (Plaintiff) in the 2022 election.

18. Defendants have made maliciously false statements about the Plaintiff that have damaged her reputation. The statements were made via televised ads paid for by LAUREN BOOK and mail-in political campaign ads.

19. The defamatory statements by the Defendants were made knowing their falsity but nonetheless done with an intent to harm and injure Plaintiff personally and in her capacities as a businesswoman, medical professional, and public servant.

20. Despite knowing their falsity, the Defendants persisted in uttering and publishing the false statements and did so with the intent to injure the Plaintiff.

21. The defamatory statements were purported by the Defendants to be statements of fact and were not opinion.

22. These are only the latest in an ongoing and utterly despicable campaign by the Defendants of slander, lies, and false information, all done for the personal benefit of the Defendants.

23. The latest defamatory and false statements were circulated in a televised campaign ad and political mail published and distributed around July 2022. Attached Composite Exhibit “A” to this lawsuit are some of the countless slanderous messages included, and stated verbatim :

- ***“Barbara Sharief’s Shameful Record on Guns & Public Safety.”***
- ***“Voted to give tax dollars to Kalashnikov USA, the maker of the notorious AK-47 assault rifle.” – The Miami Herald 3/11/18***
- ***“Invited an assault weapons manufacture to relocate to Broward County.” – The Miami Herald 3/11/18***
- ***“Voted to use YOUR tax dollars to bring the AK-47 maker to Florida.” – The Miami Herald 3/11/18***
- ***“Money for AK-47s? No more shady deals” – Sun Sentinel 3/30/18***

- *“Barbara Sharief ‘offered tax breaks for maker of Russian AK-47 assault rifles’” – The Miami Herald 3/11/18*
- *“Broward’s Sharief to Admit Guilt.” – Sun Sentinel 11/25/14*
- *“Barbara Sharief Defrauded Tax Payers.”*
- *“Sharief was caught and fined for her cheating ways.”*
- *“Barbara Sharief got rich off our suffering”*
- *“Defrauding taxpayers at the expense of our most vulnerable.”*
- *“Barbara Sharief defrauded millions in taxpayer dollars through a Medicaid overbilling scheme.”*
- *“Sharief took money from programs aimed at helping our poorest and most vulnerable residents.”*
- *“Sharief’s Sneaky Scheme.”*
- *“She narrowly avoided jail time by admitting guilt and paying a massive fine worth nearly \$600,000.”*
- *“When Barbara Sharief was mayor, your 911 calls went unanswered.” - (This article was written when the Plaintiff was not even on the commission.)*

24. BOOK falsely stated that SHARIEF was engaging in fraudulent behavior and corruption using taxpayer funds. This is simply not true. BOOK knew this was untrue and harbored serious doubts as to the veracity of the statements.

25. BOOK also knew and knows full well that similar slanderous statements were in fact publicly retracted years ago as being patently false and lies. But, BOOK cares not about the truth, only achieving her own selfish political gain.

26. BOOK falsely accused SHARIEF of being a criminal, which factual statements she knew were false when she made them.

27. BOOK also falsely portrayed the Plaintiff as an advocate for gun violence and the broad dissemination of guns, when she knew for a fact that the opposite is true! **(Photos used in the ad was actually taken when Plaintiff was at a gun buy-back program.)**

28. Defendant LAUREN BOOK has engaged in defaming the Plaintiff to the point of damaging her reputation and inflicting great emotional harm.

29. BOOK repeatedly made false statements that she knew were false but nevertheless did so with the primary malicious purpose of causing injury to the Plaintiff in her activist, representative, personal, and professional life.

30. All these statements are not only false and known or reasonably believed to be false or done while the Defendants harbored serious doubts about their truth but were done with the malicious purpose of causing harm to the Plaintiff.

31. This Court has personal and subject matter jurisdiction over the parties and this action.

32. All conditions precedent have been met, waived, or are otherwise inapplicable, including all statutory requirements, if any.

COUNT I - LIBEL

33. This is an action for libel.

34. Paragraphs 1 through 32 are realleged as if fully set forth herein.

35. The statements made by the Defendants contained false, scandalous, and defamatory statements concerning the Plaintiff.

36. The statements were published and disseminated to third parties.

37. All the statements were false and made by the Defendants with knowledge of their falsity or reckless disregard for the truth.

38. All the statements were made by Defendants with the primary malicious purpose of causing injury to the Plaintiff in her representative, activist, personal, and social life.

39. The statements exposed the Plaintiff to hatred, ridicule, distrust, and contempt by the public. The statements injured the Plaintiff's participation in community activism in that the statements accused the Plaintiff of committing, among other things, deceitful and dishonest acts.

40. As a direct and natural consequence of the publication of the statements, the Plaintiff suffered injury to her reputation and good name and suffered damages to her public image as a citizen and representative. The damage is

irreparable. Plaintiff also suffered mental anguish resulting from the patently false and libelous statements.

41. For these reasons, Plaintiff demands judgment against Defendants for damages together with an award of costs. Plaintiff demands a trial by jury on all issues so triable by jury as of right.

COUNT II - LIBEL PER SE

42. Paragraphs 1 through 32 are realleged as if fully set forth herein.

43. This is a count for libel *per se*.

44. The statements that are the subject of this complaint are false, scandalous, and defamatory concerning the Plaintiff. Defendants circulated the false statements to third parties.

45. The false statements circulated by Defendants exposed Plaintiff to distrust, disgrace, hatred, contempt, ridicule, and obloquy by the public.

46. The statements were purposely targeted by the Defendants to and did cause destruction to Plaintiff as a citizen and representative.

47. The statements are further defamatory *per se* in that they imputed to the Plaintiff characteristics incompatible with the proper exercise of her participation as a citizen and public official. More specifically, the statements falsely accused the Plaintiff of committing criminal, dishonest, and deceitful acts.

48. All the statements were false and made by the Defendants with knowledge of their falsity or reckless disregard for the truth.

49. All the statements were made by Defendants with the primary malicious purpose of causing injury to the Plaintiff in her representative, activist, personal, and social life.

50. The statements exposed the Plaintiff to hatred, ridicule, distrust, and contempt by the public. The statements injured the Plaintiff's participation in community activism in that the statements accused the Plaintiff of committing, among other things, criminal, deceitful, and dishonest acts.

51. All statements were made by Defendants with the primary purpose of causing injury to the Plaintiff in her capacity as a representative, businesswoman, and citizen.

52. As a direct and natural consequence of the publication of the false defamatory statements, Plaintiff suffered injury to her reputation and good name, suffered damages to her image as a representative, and suffered mental anguish.

53. For these reasons, Plaintiff demands judgment against Defendants for damages together with an award of costs. Plaintiff demands a trial by jury on all issues so triable by jury as of right.

Dated: July 29, 2022

Respectfully submitted,

MICHAEL A. PIZZI, JR., P.A.

MICHAEL A. PIZZI, JR.

Florida Bar No. 07945

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Miami Lakes, FL 33014

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mpizzi@pizzilaw.com

S/ Michael A. Pizzi, Jr.

MICHAEL A. PIZZI, JR.

EXHIBIT “A”

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**BARBARA SHARIEF
VOTED TO GIVE
TAX DOLLARS
TO GUN MAKERS.**


GET THE FACTS →



Barbara Sharief's **Shameful Record** on Guns & Public Safety

 Voted to give tax dollars to Kalashnikov USA, the maker of the notorious AK-47 assault rifle

 Invited an assault weapons manufacturer to relocate to Broward County

 Voted to use YOUR tax dollars to bring the AK-47 maker to Florida

Sun-Sentinel

**"Money for AK-47s?
No more shady deals"**

3/24/18

The Miami Herald

**Barbara Sharief "offered tax breaks for
maker of Russian AK-47 assault rifles"**

3/11/18

PAID ELECTIONEERING COMMUNICATION PAID FOR BY WINNING FLORIDA, P.O. BOX 30265, FT. LAUDERDALE, FL 33303.



STATE SENATOR LAUREN BOOK

Expanded Affordable Healthcare and

Fought For Us



State Senator Lauren Book worked with Republicans AND Democrats to pass critical legislation that has expanded affordable healthcare access and empowered patients.

- ▶ Created Florida's Donor Milk Bank
for infants in need
- ▶ Empowered the Agency for Health Care Administration
- ▶ Improved care for stroke patients
- ▶ Improved early childhood care
health care
- ▶ Created a prescription drug repository program
for patients
- ▶ Expanded access to specialty care for patients
can't access or treat young patients

OPEN PRIMARY ELECTION AUG. 23

NOT AN OFFICIAL COPY - PUBLIC RELEASES - NOT AN OFFICIAL COPY

BARBARA SHARIEF DEFRAUDED TAXPAYERS



SHARIEF WAS CAUGHT...AND FINED FOR HER CHEATING WAYS

SunSentinel Barbara Sharief overbilled Medicaid nearly \$700,000, state audit says

SunSentinel Later in 2011, she settled a second Medicaid overbilling agency

SunSentinel

P.O. Box 3066
Ft. Lauderdale, FL 33301

PRESENTED BY
1ST POSTAGE PAID
THRU 11/11
33341

“Broward's Sharief to admit guilt”

11/25/14



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Dr. Barbara Sharief

Apr 24, 2021

At the 3rd and final Guns for Funds Buyback Event in Miramar. So far today over 40 guns were collected including a modified semi-automatic and a shot-gun. These firearms will undergo ballistic testing to determine if the they have been used in any criminal activity and destroyed. Moms Demand Action and BSO's Neighborhood Support Team were on site to hand out helpful information.

Dr. Barbara Sharief

#commissioneronamission

#flcounties #browardinfo

#safecommunities

24

Like

Comment

Share



4:09 88°

5G 15%



Like

Comment

Share



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BARBARA SHARIEF

Defrauding taxpayers at the expense of our most vulnerable

▶ Barbara Sharief defrauded millions in taxpayer dollars through a medicaid overbilling scheme

▶ Sharief took money from programs aimed at helping our poorest and most vulnerable residents

▶ She narrowly avoided jail time by admitting guilt and paying a massive fine worth nearly \$600,000

BARBARA SHARIEF GOT RICH OFF OUR SUFFERING.

BEFORE YOU VOTE, GET THE FACTS.

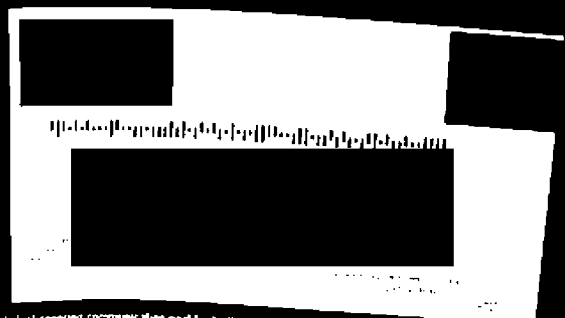


Barbara Sharief

DEFRAUDÓ A LOS CONTRIBUYENTES

SHARIEF WAS CAUGHT

**AND FINED FOR HER
CHEATING WAYS!**



Postmaster: Please allow 4-6 weeks for delivery. Payment for this communication was made by Barbara Sharief, P.O. Box 30255, Ft. Lauderdale, FL 33304.

NOT AN OFFICIAL COPY - PUBLIC ACCESS ONLY - NOT AN OFFICIAL COPY



SHARIEF'S

by overbilling Medicaid by \$500,000

SCHEME

Forced to pay a

SunSentinel

**"Broward's Sharief
to admit guilt"**

WE CAN'T TRUST

TO PROTECT TAX DOLLAR

Protect our tax dollars. Say no to sneaky schemes.

SOURCE: SUN SENTINEL 11-21-16

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