

IN THE CIRCUIT COURT OF THE
17th JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO:

06000802

LISA KRINSKY,

Plaintiff,

v.

DOE 1 a/k/a aampus,
DOE 2 a/k/a dave_martin_7777,
DOE 3 a/k/a dwentz1,
DOE 4 a/k/a milliecrowe,
DOE 5 a/k/a richardtonline1,
DOE 6 a/k/a Senor_Pinche_Wey,
DOE 7 a/k/a siouxpai2000,
DOE 8 a/k/a silviosmail@verizon.net,
DOE 9 a/k/a Bill_Wexler,
DOE 10 a/k/a lisamd33010,

Defendants.

04

A TRUE COPY
HOWARD C. FORMAN
CLERK OF CIRCUIT COURT

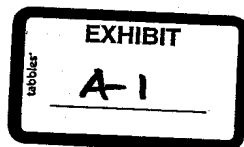
FEB 20 2006

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

COMES NOW the Plaintiff, LISA KRINSKY (individually referred to herein as the "Plaintiff") and files this lawsuit against Defendants, DOE 1 a/k/a aampus, DOE 2 a/k/a dave_martin_7777, DOE 3 a/k/a dwentz1, DOE 4 a/k/a milliecrowe, DOE 5 a/k/a richardtonline1, DOE 6 a/k/a Senor_Pinche_Wey, DOE 7 a/k/a siouxpai2000, DOE 8 a/k/a silviosmail@verizon.net, DOE 9 a/k/a Bill_Wexler, and DOE 10 a/k/a lisamd33010 (collectively and individually referred to herein as the "Defendants"), and allege as follows:

JURISDICTION AND VENUE

1. This is an action for temporary and permanent injunctive relief and for damages in excess of \$15,000.00, exclusive of interest, costs and attorneys fees.



2. The cause of action is for the Defendants' tortious interference with Plaintiff's contracts and business relationship and the Defendants' defamation of Plaintiff in Florida via internet publications in this state.

3. During the relevant period, the Plaintiff and, on information and belief, one or more of the Defendants were residents of Broward County, Florida. Further, the Plaintiff's causes of action against all Defendants accrued in Broward County, Florida where the defamatory statements were published and Plaintiff suffered damages.

4. The Defendants, if they are non-residents of this state, are subject to this Court's long-arm jurisdiction as set forth in Section 48.193(1)(b), Fla.Stat. by committing a tort in this state where Defendants caused defamatory statements to be published, interfered with Plaintiff's business relationships and Plaintiff was damaged.

THE PARTIES

5. The Plaintiff LISA KRINSKY is an individual, and formerly the President and Chief Executive Officer ("CEO") of SFBC International, Inc. ("SFBC") and a resident of Broward County, Florida. Ms. Krinsky owns approximately 675,143 shares of SFBC common stock.

6. The Defendant DOE 1 is an individual of unknown residency using the alias "aampus" for posting messages on the Yahoo! message board and in his/her other communications over the internet.

7. The Defendant DOE 2 is an individual of unknown residency using the alias "dave_martin_7777" for posting messages on the Yahoo! message board and Paul Kedrosky's Infectious Greed website blogs, and in his/her other communications over the internet.

8. The Defendant DOE 3 is an individual of unknown residency using the alias "dwentz1" for posting messages on the Yahoo! message board and in his/her other communications over the internet.

9. The Defendant DOE 4 is an individual of unknown residency using the alias "millicrowe" for posting message on the Yahoo! message board and in his/her other communications over the internet.
10. The Defendant DOE 5 is an individual of unknown residency using the alias "richardtonline1" for posting messages on the Yahoo! message board and in his/her other communications over the internet.
11. The Defendant DOE 6 is an individual of unknown residency using the alias "Senor_Pinche_Wey" for posting messages on the Yahoo! message board and in his/her other communications over the internet.
12. The Defendant DOE 7 is an individual of unknown residency using the alias "stouxpai2000" for posting messages on the Yahoo! message board and in his/her other communications over the internet.
13. The Defendant DOE 8 is an individual of unknown residency using the alias "silviosmail@verizon.net" for posting messages on the Yahoo! message board and in his/her other communications over the internet.
14. The Defendant DOE 9 is an individual of unknown residency using the alias "Bill_Wexler" for posting messages on the Silicon Investor message board and in his/her other communications over the internet.
15. The Defendant DOE 10 is an individual of unknown residency using the alias "lisamd33010" for posting messages on the Yahoo! message board and in his/her other communications over the internet.

FACTS

16. SFBC is a Delaware corporation that has offices in Miami, Florida.
17. SFBC is a publicly traded company whose shares of common stock are traded in the NASDAQ using trading symbol "SFCC".

18. Yahoo! Inc. is an internet content provider. It provides message boards for its members to post messages over the internet. SFBC and Ms. Krinsky have been the subject of numerous messages posted on the Yahoo! message board by the Defendants and others.

19. Silicon Investor provides an online discussion site with message boards for its members to post messages over the internet. SFBC and Ms. Krinsky have been the subject of numerous messages posted on the Silicon Investor message board by the Defendants and others.

20. Paul Kedrosky's Infectious Greed is a website containing blogs that Mr. Kedrosky describes as his "musing about technology, finance, venture capital, & the money culture with Paul Kedrosky" (hereinafter the "Kedrosky Blogs"). This web site allows users to post comments in his blogs. SFBC and Ms. Krinsky have been the subject of numerous comments posted on his blogs by the Defendants and others.

21. On information and belief, the Defendants are short sellers of SFBC common stock, that is, traders who bet that the market price for SFBC common stock will decline for profit. The Defendants have been posting false, misleading, derogatory and defamatory messages on the Yahoo! message boards, the Silicon Investor message boards, and the Kedrosky Blogs (individually and collectively the "Message Boards") and the to interfere with the contractual/business relationships between Ms. Krinsky and SFBC as an officer, director and shareholder of the company. By posting the defamatory messages on the Message Boards, the Defendants intend to cause stock market research analysts and SFBC's employees, consultants and investors to form a negative view of SFBC and Ms. Krinsky. The Defendants' goal is to depress the price of the stock for the short sellers' benefit, to harm Ms. Krinsky's business reputation and interfere with her contractual and business relationship with SFBC and other members of the business community.

22. The Defendant known as "aampus" has made defamatory remarks about SFBC and Ms. Krinsky. Aampus's cybersmear campaign continues through the present day. For example, Aampus has posted the following messages on the Yahoo! message boards:

- a) "In short, Krinsky and Hantmann and their cronies are crooks with apparently more than one skeleton in the closet. There is plenty of evidence if you just care to look and listen with open ears and eyes. . . . get out of this company until they replace their crooked management . . . Otherwise you may end up partaking in the drowning and going out of business of a company run by dishonest crooks . . ."
- b) "Try to first understand how Lisa and Hantmann report to each other before you blindly defend this company and these creeps."
- c) "... a sustainable recovery will not occur until this totally incompetent Jewish slut low self-esteem CEO is fired . . . This company is run by people who are thoroughly corrupt and sleazy."
- d) "... this management is not functional and is in no position to defend anything. They have no credibility left, and who knows how many skeletons in the closet. This company can not rehabilitate itself until they have fired at least Lisa and Hantman. . . I know a lot of people got hurt repeatedly by these jerks."
- e) "... probably some sleazy relationships behind the scenes to explain that one. . . She most obviously seems to have an inferiority complex. . . She (Lisa) is in her position probably for no other reason than having some sort of leverage on Hantman and/or others, i.e. knowledge of sleazy illegal dealings, or sexual favors, or worse. Clearly, Lisa is TOTALLY and UTTERLY incompetent in representative matters, which makes her a huge liability as chairperson. . . . Blame management, they belong into jail!

A photocopy of a sample of the messages posted by "aampus" on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit A.

23. The Defendant known as "dave_martin_7777" has made defamatory remarks about SFBC and Ms. Krinsky. Dave_martin_7777's cybersmear campaign continues through the present

day. For example, dave_martin_7777 has posted the following messages on the Yahoo! message boards and Paul Kedrosky's Infectious Greed website:

- a) "She give him the job because he was her man-whore, no doubt."
- b) "There may have been an issue of Seifer washing stock sales through Lisa."
- c) "Lisa and her man-whore are in NO WAY good for SFCC shareholders."
- d) "Lisa and her "rouge employee" man-whore need to go."
- e) "No way that greedy CEO bitch will 'stand by her man' if it costs her more million\$\$\$ lost . . .but one never know with women. . . .She and that fraud of a VP that's boning her need to be shown the door ASAP."
- f) "Women should not run companies."
- g) "Bet she's a greed bitch."
- h) "Bitch is raping this company."
- i) "That BITCH needs to be shown the door."
- j) "rouge employee with a shady past, a nasty temper (and probably only on the payroll because he is Lisa's man-whore . . ."

A photocopy of a sample of the messages posted by dave_martin_7777 on the Yahoo! message boards and Paul Kedrosky's Infectious Greed website blog are attached hereto and incorporated herein by reference as Composite Exhibit B.

24. The Defendant known as "dwentz1" has made defamatory remarks about SFBC and Ms. Krinsky. Dwentz1's cybersmear campaign continues through the present day. For example, dwentz1 has posted the following messages on the Yahoo! message boards:

- a) "If she is stupid enough to hang with this looser then she is a looser and should be forced out. As they say birds of a feather flock together. No wait, don't oust her until the accounting scandal starts. Then we can really show her the road to hell."
- b) "This stock price and management is all whip cream, once the heat hits it collapses down to nothing."

- c) "I see many common things with Able Labs and SFCC. These include incompetent management, bad news just getting worse, management that has no regard for the health of others, and finally loosing customers for good."
- d) "I also think certain people are way overpaid in this company given their questionable qualifications. Some of their prior actions I would not be suprised if they cook the books. They seem like the types just because they have money they can do whatever they can without any consequences. This seems to be the general consesus with the wealthy."
- e) "This company will be under survelance by the FBI, CIA, DEA, FFA, FDA, FAA, NAS, and NSA. They will even have to go outside to fart."

A photocopy of a sample of the messages posted by dwentz1 on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit C.

25. The Defendant known as "milliecrowe" has made defamatory remarks about SFBC and Ms. Krinsky. Milliecrowe's cybersmear campaign continues through the present day. For example, milliecrowe has posted the following message on the Yahoo! message board:

- a) ". . . Lisa has put herself down as "Dr." and "MD" on everything from SEC registrations to the company website. This is obviously deceptive not only to the government and investors, but also to the clients the company serves, like Merck. It's also against the law in most states. This leaves the company exposed to all types actions by the government and investors. And it's just the steaming pile of you-know-what that attorney generals love to investigate."

A photocopy of a sample of the messages posted by milliecrowe on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit D.

26. The Defendant known as "richardtonline1" has made defamatory remarks about SFBC and Ms. Krinsky. richardtonline1's cybersmear campaign continues through the present day. For example, richardtonline1 has posted the following message on the Yahoo! message boards:

- a) "re: SEIFER & KRINSKY OUT . . ."Although i can't judge the fairness of seifer after his criminal history, he simply doesn't belong in this company and knowing that he's running around trying to shut up people (employees aswell?) while thinking he's untouchable because he screws miss lisa is scary."

A photocopy of a sample of the messages posted by richardtonline1 on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit E.

27. The Defendant known as "Senor_Pinche_Wey" has made defamatory remarks about SFBC and Ms. Krinsky. For example, Senor_Pinche_Wey has posted the following messages on the Yahoo! message boards:

- a) Jerry "Lew" Seifer's New Year's Resolutions . . . I will reciprocate felatoin with Lisa even though she has fat thighs, a fake medical degree, "queefs" and has poor feminine hygiene."
- b) ". . . funny and rather sad that the losers who post here are supporting a management consisting of boobs, losers and crooks. (Krinsky, Natan and Seifer)"
- c) "Seifer a maga scum bag"
- d) "Where there is one cockroach, many more are there. . . .Firing Seifer won't stop the meltdown."
- e) "Seifer.....Out! That is one cockroach gone....how many left?"

A photocopy of a sample of the messages posted by Senor_Pinche_Wey on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit F.

28. The Defendant known as "siouxp2000" has made defamatory remarks about SFBC and Ms. Krinsky. Siouxp2000's cybersmear campaign continues through the present day. For example, siouxp2000 has posted the following message on the Yahoo! message boards:

- a) "This is a crooked company, run by crooks."

A photocopy of a sample of the messages posted by siouxp2000 on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit G.

29. The Defendant known as "silviosmail@verizon.net" has made defamatory remarks about SFBC and Ms. Krinsky. Silviosmail@verizon.net's cybersmear campaign continues through the present day. For example, silviosmail@verizon.net has posted the following message on the Yahoo! message boards:

- a) "...there upper management making to much money.. I'm sure that the books are also cooked...what a mess...where is the attorney general?"

A photocopy of a sample of the messages posted by silviosmail@verizon.net on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit H.

30. The Defendant known as "Bill_Wexler" has made defamatory remarks about SFBC and Ms. Krinsky. Bill_Wexler's cybersmear campaign continues through the present day. For example, Bill_Wexler has posted the following messages on the Silicon Investor message boards:

- a) "When Jerry pleases Mistress Lisa by scrubbing the tile in their new mansion with a toothbrush, or polishing her thigh-high leather boots, or oiling her bullwhip, perhaps it would be more appropriate if Jerry was rewarded with a few extra lashes of the riding crop during a spirited "horsie" ride - as opposed to cash from devious stock transactions"
- b) "By the way, was that Lisa I saw at JB's on the Beach in Deerfield the other night? Why was she slipping her number to Julio, the parking valet?"
- c) "Seems Lisa has a penchant for man-whores. Perhaps if she only shackled up with Jerry "Deuce Bigalow" Seifer, instead of giving him a job, the shareholders would be far better off today."

A photocopy of a sample of the messages posted by "Bill_Wexler" on the Silicon Investor boards are attached hereto and incorporated herein by reference as Composite Exhibit I.

31. The Defendant known as lisamd33010 became a member of the Yahoo! message board and misled the message board readers by impersonating Ms. Krinsky and attributing false remarks to her. This imposter has made false defamatory remarks about Ms. Krinsky.

Lisamd33010's cybersmear campaign continues through the present day. For example, lisamd33010 has posted the following messages on the Yahoo! message boards:

- a) "I quit because I wanna be with Jerry, and not because of the investigation. Arnold quit, because he wants to be with me. I love you all."
- b) "My heart felt thanks to all supports . . . I love you all. Please pray for me and Jerry."
- c) "Thanks for your loyalty and unwavering supports. Let's win this one."

A photocopy of a sample of the messages posted by "lisamd33010" on the Yahoo! message boards are attached hereto and incorporated herein by reference as Composite Exhibit I.

32. The Plaintiff has performed all conditions precedent necessary to bring this action or they have been waived.

33. The Plaintiff has retained the undersigned law firm and agreed to pay it a reasonable fee for its services and Plaintiff is entitled to attorney fees pursuant to Section 57.105, Fla.Stat.

COUNT I

INTENTIONAL INTERFERENCE OF CONTRACTUAL/BUSINESS RELATIONSHIP AGAINST ALL DEFENDANTS

34. The Plaintiff SFBC and Ms. Krinsky repeat and reallege the allegations contained in paragraphs 1 through 33 above, as if fully set forth herein.

35. Ms. Krinsky had a contractual and/or business employment relationship with SFBC.

36. At all times relevant and material hereto, the Defendants have had firsthand knowledge of the subject contractual/business relationships between SFBC and Ms. Krinsky.

37. The Defendants have intentionally and unjustifiably interfered with the subject contract/business relationships by and between SFBC and Ms. Krinsky.

38. The Defendants have caused Ms. Krinsky irreparable harm and she is without an adequate remedy at law.

39. The Defendants' interference with the subject contractual/business relationships caused Ms. Krinsky damages and Defendants are the proximate cause thereof.

40. Ms. Krinsky is entitled to injunctive relief in addition to damages to prevent further interference by the Defendants with their contractual/business relationships.

41. The Defendants' intentional interference with Ms. Krinsky's contractual/business relationship is willful, wanton and malicious.

COUNT II

DEFAMATION CLAIM AGAINST ALL DEFENDANTS EXCEPT DOE 10

42. The Plaintiff SFBC and Ms. Krinsky reallege and reassert all the allegations contained in paragraphs 1 through 33 above, inclusive.

43. The Defendants published statements via the internet concerning SFBC and Ms. Krinsky and their business reputation which are false and omit to state facts which tend to make the statements made false and misleading.

44. The Defendants' defamatory statements concerning SFBC and Ms. Krinsky are intended to impute that the Plaintiff:

- a) is dishonest;
- b) has engaged in dishonest practices;
- c) has committed fraud;
- d) has committed crimes by allegedly publishing false press releases; and
- e) has otherwise engaged in conduct which is incompatible with the proper exercise of her lawful business trade and profession.

45. The Defendants' defamatory statements are libel per se and the law presumes malice in their utterance.

46. Alternatively, the Defendants' defamatory statements are libel per quod and they were falsely and maliciously made by Defendants with the intent to injure Plaintiff and they are entitled to special damages.

47. As a result of the Defendants' publication of the defamatory statements Ms. Krinsky has been damaged and the Defendants are the proximate cause thereof.

48. Further, both Ms. Krinsky's reputation in the business community has suffered.

49. Moreover, Ms. Krinsky has suffered extreme humiliation, embarrassment and mental anguish for which damages are recoverable.

50. The Defendants' defamatory statements are willful, wanton and malicious.

RELIEF REQUESTED

WHEREFORE, Plaintiff prays and demands that:

(A) This Court enter a temporary and permanent injunction that restrains Defendants, and their agents, attorneys, servants, employees and those persons and business entities, in active concert or participation with them from making any statement or engaging in any conduct to intentionally interfere with Ms. Krinsky's contractual/business relationships;

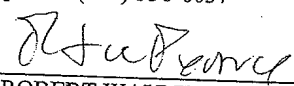
(B) That the Court award Plaintiff compensatory damages, attorneys fees, costs and interest against Defendants, jointly and severally;

(C) Reserve ruling upon the award of exemplary and punitive damages to Plaintiff and against Defendants, jointly and severally, upon Plaintiff's compliance with Section 768.79, Fla. Stat.; and

(D) Award the Plaintiff such other and further relief as the Court appears equitable and just.

Respectfully submitted,

ROBERT WAYNE PEARCE, P.A.
Attorneys for Plaintiff
1499 W. Palmetto Park Road, Suite 300
Boca Raton, Florida 33486
Telephone: (561) 338-0037

By: 
ROBERT WAYNE PEARCE
Florida Bar No. 344575

Dated: January 19, 2006