

COMMONWEALTH OF MASSACHUSETTS
Trial Court
Superior Court Department

Suffolk, SS.

Docket No(s) : 23-0127D

JULIA MEJIA
Plaintiff,

v.

AIDEN KEARNEY
Defendant

COMPLAINT AND JURY DEMAND

Introduction

1. This is an action for defamation arising from the Defendant Aiden Kearney's a/k/a "Turtle Boy" malicious publication of false and defamatory information about the Plaintiff, Julia Mejia ("Mejia").

Parties

2. The Plaintiff, Julia Mejia ("Mejia"), is an individual domiciliary of the Commonwealth of Massachusetts who resides in the Dorchester District of Boston, County of Suffolk.
3. The Defendant, Aiden Kearney ("Kearney") a/k/a "Turtle Boy", is an individual domiciliary of the Commonwealth of Massachusetts who resides at 111 Mason Road, Jefferson, MA 01522, County of Worcester.

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SUFFOLK SUPERIOR COURT
CIVIL CLERKS OFFICE

Jurisdiction and Venue

4. The jurisdiction of this Court over the Defendant is proper and lawful where he resides, works, or does business in Massachusetts and the claims brought herein arise from defamatory information which was first published in Massachusetts. Venue in this County is lawful and proper where the plaintiff resides in Suffolk County and the harms occurred in Suffolk County.

Facts Common to All Counts

5. Mejia is and was, at all times relevant herein, a duly elected Boston City Councilor at Large since 2019.
6. Kearney is a "blogger" and a self-proclaimed "news reporter" who owns and operates an online website doing business as "Turtleboy Daily News" or "TB Daily News".
7. On or about February 15, 2021, the Defendant published an article on his blog website with the headline, "***Boston City Councilor Julia Mejia Exploits Murder for Clout By Live Streaming Dead Body Instead of Calling Cops, Interfering with Crime Scene, Friends with Monica Canon Grant***". (See attached hereto: Exhibit "A").
8. The aforementioned headline was knowingly false when made by the Defendant and/or in reckless disregard to the truth.
9. The underlying article went onto state that, "***Julia Megia (sic) lives in this neighborhood and instead of calling 911***"

when she heard gun shots, or attempting to help the man, she began doing what she always does-live streaming for attention. She was able to get behind the police tape in an active crime scene, filmed his corpse, and reportedly touched him and other objects in the crime scene. She flaunted her power as a city councilor, refused to cooperate with police, and further upset the decedent's family by falsely claiming that he was still alive." Id.

10. The aforementioned article was knowingly false when made by the Defendant and/or in reckless disregard to the truth.

11. That on or about December 15, 2022, the Defendant published on various social media outlets, including Twitter and his blog, TB Daily News, that the Plaintiff was involved in a "DUI" (Driving Under the Influence) and that the incident was "**covered up by a rogue Boston cop.**" (See attached hereto: Exhibit "B").

12. The Defendant went on to state that he "**went to BPD (Boston Police Department) HQ (Headquarters) where it was confirmed an incident occurred.**" Id.

13. The aforementioned statements were entirely and wholly false and the Defendant made the aforementioned statements with total disregard for the truth.

14. The Defendant then went on a campaign of harassment of the Defendant where he posted on social media outlets and his blog, "**any comment on the DUI/smoking crack allegations?**" (See attached hereto: Exhibit "C").

15. In another post on social media or his blog, the Defendant stated, "**are you really struggling if you're so powerful that cops help you cover up your DUI?**" (See attached hereto: Exhibit "D").

16. That the Defendant again stated on a social media post or his blog on or about December 15, 2022, "**This is peak cringe. But she's totally not on something. Stop asking questions!**" (See attached hereto: Exhibit "E").

17. Each of the aforementioned statements made by the Defendant were knowingly false and made with malice as well as a total disregard of the truth.

Count I
DEFAMATION/LIBEL

18. The Plaintiff incorporates by reference in their entirety all previous and subsequent paragraphs of this complaint.

19. As detailed above, the Defendant Kearney published statements of or concerning the Plaintiff, Mejia, in February 2021 and December of 2022 that were false, libelous, and defamatory, per se. In doing so, Defendant

held the Plaintiff up to public scorn and ridicule and destroyed or severely injured her good name and reputation, and future employment and election opportunities.

20. The aforementioned published statements of or concerning Mejia in February 2021 and December 2022 were defamatory, per se, because they impute dishonesty, immorality, vice, violations of criminal law and dishonorable conduct to Mejia and injured Plaintiff in her personal and professional career. The Defendant knew or should have known the statements about Plaintiff were false and recklessly published the information unnecessarily, unreasonably, and excessively with disregard for their falsity.

21. All the above-described statements were false, malicious and were published with a knowing, intentional, subjective awareness of, and/or reckless disregard of, their falsity.

22. As a direct and proximate result of the Defendant's defamatory and libelous statements, the Plaintiff suffered injury, and has been held up to scorn, ridicule and abuse.

Count II
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

23. The Plaintiff incorporates by reference in their entirety all previous and subsequent paragraphs of this complaint
24. Defendant's conduct was extreme, outrageous, beyond all possible bounds of decency, and utterly intolerable in a civilized community.
25. Plaintiff was severely emotionally distressed due to Defendant's conduct.
26. Plaintiff experienced and continues to experience mental anguish and anxiety due to the Defendant's conduct.

Prayers for Relief

Wherefore, the Plaintiff, Julia Mejia, respectfully requests that the Court grant her the following relief:

- A. Enter judgment in her favor and against the Defendant on each count of this complaint.
- B. Award her damages against the Defendant in an amount determined by the court to be reasonable and just in addition to statutory interest.
- C. Award her attorney's fees and costs reasonably incurred and expended by her in the necessary prosecution of this Complaint.

D. That the court declare that the Defendant defamed the Plaintiff and issue an injunction against the Defendant from further making such defamatory statements and publishing the same.

E. Grant such other and further relief as the Court deems just and proper.

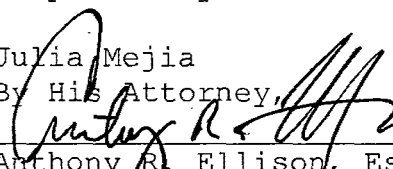
Jury Demand

The Plaintiff demands a trial by jury on all counts and all issues so triable.

Respectfully Submitted,

Julia Mejia

By His Attorney,


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Dated: January 4, 2023