

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

DANIEL E. DOYLE, JR. and
INSTITUTE FOR INTERNATIONAL SPORT,
Plaintiffs,

v.

C.A. No. PC 2015-_____

WPRI-TV, MEDIA GENERAL, INC.,
MEDIA GENERAL OPERATIONS, INC.,
TVL BROADCASTING, LLC, AND
WALTER BUTEAU,
Defendants.

COMPLAINT

I. PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Daniel Doyle is a resident of the state of Connecticut and Founder and Executive Director of the Institute for International Sport (“Institute”).

2. Plaintiff Institute for International Sport is a domestic Rhode Island non-profit corporation with a principal place of business at 3045 Kingstown Road in Kingston, Rhode Island.

3. WPRI-TV is a broadcast television station affiliated with the CBS television network and operates under a license issued by the Federal Communications Commission with the permission of the FCC. WPRI is located at 25 Catamore Boulevard in East Providence, Rhode Island, and is owned by TVL Broadcasting, LLC, Media General Operations, Inc., and Media General, Inc.

4. Defendant TVL Broadcasting, LLC, is a Delaware limited liability company with a principal place of business at One West Exchange Street, Suite 5a, Providence, Rhode Island, and 333 E. Franklin Street, Richmond, Virginia, 23219.

5. Defendant Media General Operations, Inc., is a Delaware Corporation registered in the State of Rhode Island as a foreign company and with a principal place of business at 333 E. Franklin Street, Richmond, Virginia, 23219.

6. Defendant Media General, Inc., is a Delaware Corporation with a principal place of business at 333 E. Franklin Street, Richmond, Virginia, 23219.

7. Upon information and belief, Defendant Walter G. Buteau is a Rhode Island resident.

8. Subject matter jurisdiction is proper in this Court pursuant to R.I. General Laws § 8-2-14.

9. Venue is proper in this Court pursuant to R.I. General Laws § 9-4-3 and § 9-4-4.

II. FACTS

10. The Institute administers scholar-athlete and sportsmanship programs throughout the world.

11. Mr. Doyle founded the Institute in 1986.

12. Mr. Doyle spent over four decades developing an international reputation in his field.

13. Mr. Doyle spent over four decades cultivating an international reputation for the Institute.

14. For his work at the Institute, Mr. Doyle was awarded two honorary doctorate degrees, a trusteeship at his Alma Mater, Bates College, distinguished alumni awards from all four of his alma maters, St. John's High, Worcester Academy, Bates College, and the Fletcher School of Law and Diplomacy.

15. Mr. Doyle has been inducted into the Rhode Island Heritage Hall of Fame, and awarded the Terence Cardinal Cooke Humanitarian Award, as well as the Irish Sportsman of the Year Award (presented to him by Irish President, Mary Robinson), the key to the City of Worcester, Massachusetts, among innumerable other awards.

16. Mr. Doyle has been the subject of statements by world figures addressing his vision, tenacity and success in using sport and the arts as media of world peace.

17. Mr. Doyle has appeared on network and cable television many times representing the Institute and his work as Founder and Executive Director of the Institute. Mr. Doyle's

appearances include ESPN, CNN, Fox, other major affiliates. Mr. Doyle has also been the subject of countless newspaper articles which consistently portrayed Mr. Doyle, the Institute for International Sport, the University of Rhode Island and the State of Rhode Island, in a positive light.

18. Dan Doyle served four years on the West Hartford (CT) Board of Education

19. Mr. Doyle has brought millions of dollars into the Rhode Island economy. Just one private donor made contributions to the Institute that far exceeded the combined amount of State of Rhode Island grants and all other Rhode Island-based donations.

20. Over the span of his career, Mr. Doyle has developed working relationships with world leaders in politics, education, entertainment, publishing, sport and the arts on behalf of the Institute.

21. These relationships and Plaintiff's reputation have been severely compromised by Defendants' inaccurate and inflammatory reporting.

22. On or about May 12, 2014, Defendants broadcast a television news story on WPRI-TV about the Institute and Mr. Doyle ("TV Package").

23. Defendants' TV Package was published in both written and verbal forms.

24. On or about May 12, 2014, Defendants published a related news story on its website, wpri.com, about the Institute and Mr. Doyle ("Web Story").

25. The TV Package and Web Story are collectively referred to herein as the "Defamatory Stories."

26. In the TV Package, Defendants state that the Institute "has received more than \$5 million in taxpayer money over the past decade."

27. In the Defamatory Stories, Defendants state that the Institute "solicited tax deductible donations on its website for almost a year"

28. In the Defamatory Stories, first published on or about May 12, 2014, Defendants state that the Institute "accepted contributions last month."

29. In the Defamatory Stories, Defendants state that the Institute has a “one-dollar-a-year lease for its Kingston offices with the University of Rhode Island”

30. Defendants state in the Defamatory Stories that in approximately February, 2014, Mr. Doyle’s attorney told Defendants that the Institute “had not received any donations since the tax exempt status was revoked.”

31. Defendants state in the Defamatory Stories that the Institute’s website “provided contribution links” and that the website stated that “all contributions are tax deductible.”

32. Defendants state in the Defamatory Stories that the website’s statement that “all contributions are tax deductible” had remained unchanged since February, 2014.

33. Defendants attempted to make contributions to the Institute through the Institute’s website and caused its agents to attempt to make contributions to the Institute through the Institute’s website.

34. Defendants state in the Defamatory Stories that Defendants’ or Defendants’ agents’ attempted contributions to the Institute were “accepted by the institute.”

35. Defendants state in the Defamatory Stories that Defendants’ or Defendants’ agents’ attempted contributions to the Institute were “accepted by the institute” on five different occasions over the course of a month.

36. Defendants state in the Defamatory Stories that none of the Defendants’ agents who attempted contributions to the Institute in 2014 “received notations on their receipts stating their contributions were not tax-deductible.”

37. Defendants state in the Defamatory Stories that on April 28, 2014, the Institute’s website stated that contributions are tax deductible.

38. Defendants state in the Defamatory Stories that the IRS said that the Institute is “not allowed to receive tax deductible donations.”

39. Defendants state in the Defamatory Stories that the Institute changed its website on or about April 28, 2014, to remove the reference to contributions not being tax deductible.

40. In approximately May, 2014, Defendants ambushed Mr. Doyle at the Institute to ask Mr. Doyle questions on camera, though Defendants had not made an appointment with Mr. Doyle nor provided Mr. Doyle a copy of any of the information about which they sought Mr. Doyle's comments.

41. Defendants' treatment of Mr. Doyle and their Defamatory Stories are part of Defendants' year-long coordinated campaign to harm the professional reputation of Mr. Doyle and the Institute in the community.

42. Defendants are still broadcasting and publishing the Defamatory stories on WPRI.com, and have been since 2014 despite Plaintiffs' requests to correct them.

COUNT ONE
LIBEL PER SE

43. Plaintiffs repeat and incorporate by reference all paragraphs above and below as if restated here in full.

44. Defendants' statement in the Defamatory Stories that the Institute "has received more than \$5 million in taxpayer money over the past decade" was false when made.

45. Defendants knew that this statement was false when made, and made the statement with actual malice or with reckless disregard for its truth.

46. Defendants' statement in the Defamatory Stories that the Institute has a "one-dollar-a-year lease for its Kingston offices with the University of Rhode Island" was false when made.

47. Defendants knew that this statement was false when made, and made the statement with actual malice or with reckless disregard for its truth.

48. Defendants' statement in the Defamatory Stories in May, 2014, that the Institute "accepted contributions last month" was false when made.

49. Defendants knew that this statement was false when made, and made the statement with actual malice or with reckless disregard for its truth.

50. Defendants' statement in the Defamatory Stories that Defendants' or Defendants' agents' attempted contributions to the Institute were "accepted by the institute" was false when made.

51. Defendants knew that this statement was false when made, and made the statement with actual malice or with reckless disregard for its truth.

52. Defendants' statement in the Defamatory Stories that Defendants' or Defendants' agents' attempted contributions to the Institute were "accepted by the institute" on five different occasions over the course of a month was false when made.

53. Defendants knew that this statement was false when made, and made the statement with actual malice or with reckless disregard for its truth.

54. Defendants' Defamatory Stories were about the Plaintiffs.

55. Defendants' Defamatory Stories caused Defendants damages in an amount to be ascertained by a jury at trial.

56. Defendants' Defamatory Stories pertained to, were calculated to denigrate, and in fact denigrated and still denigrate Mr. Doyle's profession and career.

57. Defendants' Defamatory Stories pertained to, were calculated to denigrate, and in fact denigrated and still denigrate the Institute's professional reputation in the industry.

58. Defendants' Defamatory Stories falsely imputed a crime to Mr. Doyle and the Institute.

59. Defendants' Defamatory Stories irreparably harmed the reputations of Mr. Doyle and the Institute.

60. In a letter dated and sent September 12, 2014 ("September 12 Letter"), Plaintiffs, through Mr. Doyle's attorney, informed Defendants of their false statements and explained why the Defamatory Stories were false and defamatory.

61. After receiving Mr. Doyle's attorney's September 12 Letter, no Defendant made an apology on air, an apology via website, nor ever publicly corrected the Defamatory Stories.

62. Defendants' failure to take down or correct the Defamatory Stories after receiving the September 12 Letter demonstrated that Defendants' Defamatory Stories were made and published with actual malice or reckless disregard for their falsity.

63. Defendants' Defamatory Stories denigrating Mr. Doyle in his career and imputing a crime each Plaintiff constitute libel per se and allows this Court and a jury to presume that each Plaintiff has suffered damages for which each Defendant is jointly and severally liable.

COUNT TWO
SLANDER PER SE

64. Plaintiffs repeat and incorporate by reference all paragraphs above and below as if restated here in full.

65. Defendants' Defamatory Stories denigrating Mr. Doyle in his career and imputing a crime each Plaintiff in a verbal form constitute slander per se and allows this Court and a jury to presume that each Plaintiff has suffered damages for which each Defendant is jointly and severally liable.

COUNT THREE
R.I. GEN. LAWS §9-1-28.1(a)(4)
FALSE LIGHT

66. Plaintiffs repeat and incorporate by reference all paragraphs above and below as if restated here in full.

67. Defendants' publication of a false or fictitious fact, to wit, that the Institute "has received more than \$5 million in taxpayer money over the past decade" implies an association which does not exist.

68. This association, published or implied, would be objectionable to the ordinary reasonable person under the circumstances.

69. Defendants' publication of a false or fictitious fact, to wit, that the Institute "accepted contributions" in April or May, 2014, implies an association which does not exist.

70. This association, published or implied, would be objectionable to the ordinary reasonable person under the circumstances.

71. Specifically, Defendants state or imply that Plaintiffs performed an unethical and illegal act which, in reality, neither Plaintiff ever performed.

72. Defendants' publication of a false or fictitious fact, to wit, that the Institute has a "one-dollar-a-year lease for its Kingston offices with the University of Rhode Island" implies an association which does not exist.

73. This association, published or implied, would be objectionable to the ordinary reasonable person under the circumstances.

74. Defendants' publication of a false or fictitious fact, to wit that Defendants' or Defendants' agents' attempted contributions to the Institute were "accepted by the institute" implies an association which does not exist.

75. This association, published or implied, would be objectionable to the ordinary reasonable person under the circumstances.

76. Specifically, Defendants state or imply that Plaintiffs performed an unethical and illegal act which, in reality, neither Plaintiff ever performed.

77. Defendants' publication of a false or fictitious fact, to wit, that Defendants' or Defendants' agents' attempted contributions to the Institute were "accepted by the institute" on five different occasions over the course of a month implies an association which does not exist.

78. This association, published or implied, would be objectionable to the ordinary reasonable person under the circumstances.

79. Specifically, Defendants state or imply that Plaintiffs performed an unethical and illegal act which, in reality, neither Plaintiff ever performed.

80. Defendants' publication of a false or fictitious fact, to wit, that none of the Defendants' agents who attempted contributions to the Institute in 2014 "received notations on their receipts stating their contributions were not tax-deductible" implies an association which does not exist.

81. This association, published or implied, would be objectionable to the ordinary reasonable person under the circumstances.

82. Specifically, Defendants state or imply that Plaintiffs performed an unethical and illegal act which, in reality, neither Plaintiff ever performed.

83. The associations published and implied by Defendants' false or fictitious facts were made maliciously by Defendants or with reckless disregard for the truth.

84. Defendants' publication and implication of objectively objectionable associations which do not exist caused Plaintiffs damages in an amount to be determined by a jury and for which each Defendant is jointly and severally liable.

COUNT FOUR
TRESPASS

85. Plaintiffs repeat and incorporate by reference all paragraphs above and below as if restated here in full.

86. On several occasions in 2014, Defendant Walter Buteau and a videographer employed by Defendants walked onto the property leased by the Institute for International Sport to videotape Mr. Doyle.

87. On these occasions, neither Mr. Buteau or Defendants' videographer requested permission to walk onto property leased by the Institute.

88. On these occasions, Mr. Buteau and Defendants' videographer attempted to interview Mr. Doyle without requesting permission and without advance notice.

89. On these occasions, Mr. Buteau and Defendants' videographer interviewed and videotaped Mr. Doyle on land leased by the Institute even though Mr. Doyle made clear to Mr. Buteau and Defendants videographer that their presence was not allowed on land leased by the Institute.

90. On these occasions, Mr. Buteau and Defendants' videographer were working in the course and scope of their work for Defendants, with Defendants' full knowledge and assent, or Defendants' ratification of their actions.

91. Defendants are vicariously liable for Mr. Buteau's and Defendants' videographer's trespass described herein.

92. Mr. Buteau's and Defendants' videographer's intentional walking onto land leased by the Institute without Plaintiffs' permission was intended to maliciously harass Mr. Doyle and constitutes a trespass for which Defendants are jointly and severally liable.

WHEREFORE, Plaintiff Daniel Doyle and the Institute for International Sport hereby ask this Honorable Court to find in their favor, find each Defendant jointly and severally liable for the statutory and common law counts above, and award each Plaintiff compensatory damages, special damages, consequential damages, equitable relief, punitive damages, and all other damages and relief this Court finds mete and just.

Respectfully Submitted,
DANIEL DOYLE and
INSTITUTE FOR INTERNATIONAL
SPORT
By and through their Attorney,

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Dated: October _____, 2015

Plaintiff demands a TRIAL BY JURY for all issues so triable and designates Chip Muller, Esq., as trial counsel.

DANIEL DOYLE and
INSTITUTE FOR
INTERNATIONAL SPORT
By and through its Attorney,

Chip Muller, Esq. (#7686)