

H. ROBERT BONEY, JR.
Attorney-at-Law
553 New Road, Suite F
P.O. Box 125
Somers Point, NJ 08244
(609) 653-1200

Attorney for Plaintiff

**RECEIVED and
FILED**

**AUG 05 2009
ATLANTIC COUNTY
LAW DIVISION**

ANDREW CORNAGLIA, :
 :
Plaintiff, :
 :
vs. :
 :

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
ATLANTIC COUNTY

DOCKET NO. **L-3014-09**
Civil Action

IRELIA GOMBERG, Individually :
and a/k/a THE ANSWER GUY and :
THE PRESS OF ATLANTIC CITY, :
a partnership, or corporation of the :
State of New Jersey, jointly, :
severally and in the alternative, :
 :

COMPLAINT and JURY DEMAND

Defendants.

Plaintiff, ANDREW CORNAGLIA, residing at 41 S. Village Drive in the City of Somers Point, County of Atlantic and State of New Jersey by way of Complaint against defendants says:

1. On or about August, 2008 defendants made and/or caused to be published various falsehoods of a defamatory nature from a 1992 Press article and various other defamatory falsehoods, including but not limited to, false assertions or strong implications of criminal behavior and activity on his part, criminal associations and various other untrue false claims of facts which injured and harmed the plaintiff's reputation since they were untrue and circulated in defendant's newspaper of general circulation in the Atlantic County, South Jersey and New Jersey in general.

2. The various false assertions of fact and strong implied claims that plaintiff was engaged in criminal activity and associations were false, known to be false by the defendants and/or not investigated properly but instead were published with the reckless disregard of their veracity, and with full knowledge that these false claims, innuendos and implications would grievously damage and harm the reputation of the plaintiff in the community in which he lives, both as a businessman and as a citizen.

3. The various false assertions of fact and claims by the defendants about the plaintiff are libelous in nature and constitute libel per se since they include claims or innuendos that he is a criminal and/or engaged at one time in criminal associations all of which claims and innuendos are not true. The defendants failed to investigate the veracity of their claims and innuendos which was done maliciously and/or negligently where they knew of their duty to check on the accuracy of such claims and false innuendos but failed to even attempt to carry out and discharge that duty as journalists, reporters and person engaged in the news and commentary business.

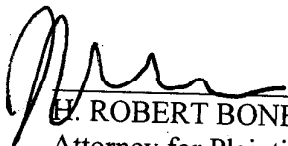
4. The defendants claims included but were not limited to specifically asserting that in 1994 the plaintiff paid various moneys in back taxes and penalties to the State of New Jersey as part of a deal with the State Attorney General giving the public the impression that he did improper acts; these claims and innuendos included the claim that the plaintiff used his place of business at the time, known as the Anchorage Tavern to "transport and store P2P, the chemical precursor of the drug methamphetamine, commonly called speed according to SCI records". This is also false and veracity was unchecked by defendants and instead published with reckless disregard of its truth or falsehood and in fact may have been known to be false by the defendants.

5. The defendants also published that the “SCI fingered Andrew Cornaglia, Jr. as part of Nicodemo Scarfo’s crime syndicate – and how the Anchorage was frequented by Scarfo and his associates, including Saul Kane... Cornaglia also helped Kane – who was sentenced to 95 years for drug trafficking...”. These claims and assertions were also false, not checked on as to their veracity by the defendants who then published them with either malice or recklessness regarding the truth or falsity, knowing that they would tend to harm the plaintiff and his reputation in the community in which he resides.

6. The defendants also claimed that the Anchorage experienced “an early 90’s slump” after the plaintiff took over ownership, management or operations of the same which was also not true and known to be false by the defendants at the time they made said publication.

7. The various false claims and assertions, innuendos of criminal and other behavior as well as criminal association were all false, constitute libel as well as libel per se and operated to damage and injure the reputation of the plaintiff as a citizen with many friends and associations in the greater Somers Point and Atlantic County area. There is mounting evidence that his good character and integrity has been harmed in the community in which he resides as a direct result of these falsehoods published and/or re-published by the defendants.

WHEREFORE, plaintiff hereby demands judgment against defendants for damages, punitive damages, counsel fees, interest and costs of suit.


H. ROBERT BONEY, JR., ESQUIRE
Attorney for Plaintiff

Dated: August 4, 2009

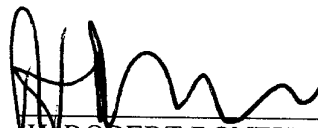
Plaintiff hereby demands a trial by jury in the above cause.



H. ROBERT BONEY, JR., ESQUIRE
Attorney for Plaintiff

CERTIFICATION PURSUANT TO R.4:5-1

I hereby certify that, pursuant to R.4:5-1, the within matter in controversy is not the subject of any other action pending in any court or arbitration proceeding and at this time there does not appear to be any other party who should be joined in this action.



H. ROBERT BONEY, JR., ESQUIRE
Attorney for Plaintiff