

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION

FILED-2
 2012 FEB -7 AM 10:01
 CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 LAW DIVISION
 CLERK
 DOROTHY BROWN

GUADAGNINI VIOLIN SHOP, and)
 CHUNYEE LU)
)
 Plaintiffs,)
)
)
 ERIC SWANSON, a/k/a)
 TRUTHTELLER1790, a/k/a)
 TRUTH TELLER, a/k/a)
 TRUTH T., a/k/a)
 Individual using IP address 24.148.68.163)
 on January 21, 2011,)
)
 Defendant.)

CASE NO. 2012 L 000802



AMENDED VERIFIED COMPLAINT

Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU (collectively "Plaintiffs") by their attorneys, Litchfield Cavo LLP, hereby complain against the Defendant, Eric Swanson a/k/a Truthteller1790 a/k/a Truthteller, a/k/a Truth T., a/k/a the individual using IP address 24.148.68.163 on January 21, 2011 ("Defendant") as follows:

301
 25
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PARTIES, JURISDICTION AND VENUE

1. Plaintiff, Guadagnini Violin Shop, is an Illinois business, located in the City of Chicago, which specializes in the restoration and repair of various musical instruments and bows. Guadagnini is also an authorized dealer for many fine instrument makers. Guadagnini serves musicians and collectors worldwide.

2. Plaintiff, CHUNYEE LU ("Lu"), is a current resident of Chicago, Illinois. Lu is the owner of Guadagnini Violin Shop. Lu possesses decades of daily experience in restoring fine instruments and bows. Lu has served some of the most influential musicians throughout the world and has performed very important restoration works on

some of the world's finest and rarest instruments for a large number of high profile clientele. He also serves as an identification, authentication, and valuation connoisseur and scholar for concert artists, musicians for major orchestras, and private collectors all over the world. Guadagnini Violin Shop's appraisals are highly regarded and respected by major insurance companies. Lu is the person who interacts with customers and performs the work at Guadagnini Violin Shop so that any statements about practices of the shop are statements directed personally to Lu.

3. Defendant Eric Swanson, a/k/a TruthTeller1790 a/k/a Truth Teller a/k/a Truth T., a/k/a the individual using IP Address 24.248.68.163 on January 21, 2011 ("Truth Teller" or "Defendant") to post on the internet certain defamatory statements about Plaintiffs, lives in the City of Chicago and operates in the City of Chicago a violin bow shop in competition with Plaintiffs, and has adopted the foregoing pseudonyms to identify himself to the public.

4. Venue is proper in this Court pursuant to Illinois Supreme Court Rule 224(a)(ii) as this is a Court in which an action or proceeding might be brought to address the harm done to Guadagnini and Lu, as well as the county in which the Defendant used a computer with IP Address 24.148.68.163 to post the defamatory misrepresentations, as well as the county in which Plaintiffs incurred injury and thus where the cause of action arose.

BACKGROUND FACTS

5. On January 21, 2011, Defendant, using the name "TruthTeller1790," anonymously posted a review of Plaintiffs on the CityGrid website, Citysearch.com.

Specifically, Defendant posted the following false statement about Plaintiffs entitled “Dangerously Dishonest:”

This violin ‘shop’ is in the habit of selling instruments and bows which are outrageously overpriced and even worse, not made by the makers advertised. They often sell unneeded, super expensive repair jobs to unsuspecting customers. It amazes me that a person would run their business in such an immoral, underhanded way, preying on working musicians and students who need honest help and guidance. Please, please avoid this shop!

A copy of the January 21, 2011, Citysearch.com review created by Defendant is attached hereto as Exhibit A. The misrepresentation expressly but falsely accused the Plaintiffs of regularly engaging in dishonest, fraudulent and/or criminal activity in their business and thus constitutes defamation *per se*. Plaintiffs have never sold instruments or bows that were outrageously overpriced and are not in the “habit” of doing so. Plaintiffs have never sold any instruments not made by the maker advertised by Plaintiffs. Plaintiffs have never sold unneeded, expensive repair jobs.

6. On or about January 21, 2011, Defendant, using the name “TruthT.,” anonymously posted a review of Plaintiffs, Guadagnini and Lu, on the website Yelp.com. Specifically, Defendant posted the following false statement about Plaintiffs:

Would you like to buy a gold mounted tortoise shell bow for \$4500 that is actually worth \$800 and is, in fact, made of gold-colored metal and faux-plastic shell? Then please go to this shop! Would you like to be told that your perfectly sound violin needs a new bassbar, costing over a thousand dollars? Step right up, because a sucker is born every minute. How about buying a ‘French’ violin for \$20,000 that is actually a \$3000 German factory fiddle? AVOID THIS SHOP.

A copy of the January 21, 2011, Yelp.com review created by Defendant is attached hereto as Exhibit B. The misrepresentation expressly but falsely accused the Plaintiffs of

regularly engaging in dishonest, fraudulent and/or criminal activity in their business and thus constitutes defamation *per se*. Plaintiffs have never sold a gold mounted tortoise shell bow for \$4500, much less one that is actually worth \$800 and made of gold-colored metal and faux-plastic shell. Plaintiffs have never recommended that a perfectly sound violin needed an unnecessary new bassbar. Plaintiffs have never sold a \$3000 German factory fiddle as a \$20,000 French violin.

7. On or about January 21, 2011, Defendant, using the name "TruthT.," also posted the above-referenced Yelp review of Plaintiffs, Guadagnini and Lu, on the website Dexknows.com. A copy of the January 21, 2011, Dexknows.com review created by Defendant is attached hereto as Exhibit C.

8. On or about January 21, 2011, Defendant, using the screen name "Truthteller1790," anonymously posted a review of Plaintiffs, Guadagnini and Lu, on the website Kudzu.com. Specifically, Truthteller1790 posted the following false statement about Plaintiffs entitled "RIPOFF ARTIST:"

Please don't go to this shop unless you want to be sold something which isn't what its purported to be for an outrageous price. They also will try to convince you your instrument needs a super expensive repair when it just need an adjustment. Ripoff.

A copy of the January 21, 2011, Kudzu.com review created by Defendant is attached hereto as Exhibit D. The misrepresentation expressly but falsely accused the Plaintiffs of regularly engaging in dishonest, fraudulent and/or criminal activity in their business and thus constitutes defamation *per se*. Plaintiffs have never knowingly sold at any price any products that were not what Plaintiffs purported or represented them to be. Plaintiffs have

never attempted to convince anyone that they needed an expensive repair to an instrument when the instrument just needed an adjustment.

9. On or about January 21, 2011, Defendant, using the name "Truth Teller," anonymously posted a review of Petitioners, Guadagnini and Lu, on the website Merchantcircle.com. Specifically, Defendant posted the following false statement about Plaintiffs entitled "Totally Dishonest:"

Please beware of this shop. They are in the habit of selling overpriced instruments and bows that are often not made by who they say they are. They also convince struggling musicians to spend tons of money on repairs that are not needed. There are so many reputable violin shops in Chicago – avoid this place please.

A copy of the January 21, 2011, Merchantcircle.com review created by Defendant is attached hereto as Exhibit E. The misrepresentation expressly but falsely accused the Plaintiffs of regularly engaging in dishonest, fraudulent and/or criminal activity in their business and thus constitutes defamation *per se*. Plaintiffs have never knowingly sold instruments or bows at any price that were not made by whom Plaintiffs said made them and are certainly not in the "habit" of doing so. Plaintiffs have never attempted to convince any customer to spend money on repairs that were not needed.

10. The above-referenced anonymous reviews posted on the respective websites are accessible from every state in the United States. The false statements were published to harm Plaintiffs' reputation, particularly in the eyes of the musician community, which Plaintiffs serve. The purpose of posting these false statements was to deter Plaintiffs' customers from patronizing Guadagnini's Violin Shop. The false statements impute that Plaintiffs lack the ability to serve customers honestly and have prejudiced Plaintiffs in their profession.

11. On a daily basis, numerous individuals have read the defamatory material posted to the respective sites and many of those viewers have chosen to eschew Plaintiffs' services as a result of the false statements. In addition, the false and defamatory reviews were copied to numerous other websites and continued to be posted on the internet throughout 2011 and until the present.

12. All of the defamatory material was posted by Defendant from a computer with the IP address 24.148.68.163 on January 21, 2011. The IP address was owned or operated by RCN Corporation and RCN and its agents have identified the registered subscriber of IP address 24.148.68.163 as Defendant Eric Swanson.

13. Plaintiffs did not learn of the existence of any of the reviews until February 7, 2011.

COUNT I – DEFAMATION PER SE

14. Plaintiffs incorporate paragraphs 1 through 13 as paragraph 14 of Count I.

15. Defendant made the foregoing false statements of fact about Plaintiffs, knowing them to be false. Defendant has never been a customer of Plaintiffs and thus had no personal knowledge of its business practices or "habits" and had no personal knowledge of any actual sales or repair transactions by Plaintiffs. Instead, Defendant knowingly made false statements about Plaintiffs with the intent and purpose of harming the Plaintiffs' business because Defendant is also the owner and operator of a violin bow shop in the same market as Plaintiffs and thus is a competitor of Plaintiffs.

16. Defendant made an unprivileged publication of such false defamatory statements to third parties by posting the statements on several websites, and made such

publications intentionally, maliciously and knowing the statements were false or in reckless disregard for the truth.

17. Plaintiffs have been substantially damaged as a direct and proximate result of Defendant's publication of the false and defamatory statements.

WHEREFORE, Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU, request that this Court enter judgment in their favor and against the Defendant Eric Swanson, a/k/a TRUTHTELLER1790, a/k/a TRUTH TELLER, a/k/a TRUTH T., a/k/a Individual using a computer with IP Address 24.148.68.163 on January 21, 2011 in an amount in excess of \$50,000.00 plus punitive or exemplary damages in excess of \$50,000.00 plus attorney's fees, costs and post-judgment interest and such further relief as the Court deems proper.

COUNT II – DEFAMATION PER QUOD

18. Plaintiffs incorporate paragraphs 1 through 17 as paragraph 18 of Count II.

19. Plaintiffs have been damaged as a direct and proximate result of Defendant's false statements, including losing numerous customers and potential customers as a result of the statements.

WHEREFORE, Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU, request that this Court enter judgment in their favor and against the Defendant Eric Swanson, a/k/a TRUTHTELLER1790, a/k/a TRUTH TELLER, a/k/a TRUTH T., a/k/a Individual using a computer with IP Address 24.148.68.163 on January 21, 2011 in an amount in excess of \$50,000.00 plus punitive or exemplary damages in excess of

\$50,000.00, plus attorney's fees, costs and post-judgment interest and such further relief as the Court deems proper.

COUNT III – FALSE LIGHT

20. Plaintiffs incorporate paragraphs 1 through 19 as paragraph 20 of Count III.

21. Defendant's actions placed Plaintiffs in a false light before the public by falsely claiming that Plaintiffs were dishonest and engaged in fraud.

22. The false light would be highly offensive to the reasonable person.

23. Defendant acted with actual malice in publishing the false statements and acted for the purpose of injuring Plaintiffs' reputation.

24. Plaintiffs have been damaged as a direct and proximate result of Defendant's false statements, including losing numerous customers and potential customers as a result of the false statements.

WHEREFORE, Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU, request that this Court enter judgment in their favor and against the Defendant Eric Swanson a/k/a TRUTHTELLER1790, a/k/a TRUTH TELLER, a/k/a TRUTH T., a/k/a Individual using a computer with IP Address 24.248.68.163 on January 21, 2011 in an amount in excess of \$50,000.00 plus punitive or exemplary damages in excess of \$50,000.00, plus attorney's fees, costs and post-judgment interest and such further relief as the Court deems proper.

COUNT IV – Tortious Interference with Prospective Economic Advantage

25. Plaintiffs incorporate paragraphs 1 through 24 as Paragraph 25 of Count IV.

26. Plaintiffs had a reasonable expectation of valid business relationships with prospective customers who read the foregoing websites.

27. Defendant knew about these prospective economic relationships.

28. Defendant intentionally interfered with Plaintiffs' expectancy and prevented the expectancy from ripening into valid business relationships by posting false information about Plaintiffs for the intentional and improper purpose of harming Plaintiffs. Defendant intentionally interfered with Plaintiffs' expectancy for the improper purpose of harming the business of a competitor and to increase improperly the amount of Defendant's own violin bow business.

29. Defendant's intentional interference injured Plaintiffs by causing prospective customers to not do business with Plaintiffs.

WHEREFORE, Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU, request that this Court enter judgment in their favor and against the Defendant Eric Swanson, a/k/a TRUTHTELLER1790, a/k/a TRUTH TELLER, a/k/a TRUTH T., a/k/a Individual using a computer with IP Address 24.148.68.163 on January 21, 2011 in an amount in excess of \$50,000.00, plus punitive or exemplary damages in excess of \$50,000.00, plus attorney's fees, costs and post-judgment interest and such further relief as the Court deems proper.

COUNT V – Consumer Fraud and Deceptive Business Practices Act

30. Plaintiffs incorporate paragraphs 1 through 29 as Paragraph 30 of Count V.

31. Defendant engaged in unfair competition and/or unfair or deceptive acts or practices in violation of the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/2.

32. Plaintiffs are entitled to recover their actual damages, punitive damages and their attorney's fees under 815 ILCS 505/10a.

WHEREFORE, Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU, request that this Court enter judgment in their favor and against the Defendant Eric Swanson, a/k/a TRUTHTELLER1790, a/k/a TRUTH TELLER, a/k/a TRUTH T., a/k/a Individual using a computer with IP Address 24.148.68.163 on January 21, 2011 in an amount in excess of \$50,000.00, plus punitive or exemplary damages in excess of \$50,000.00, plus attorney's fees, costs and post-judgment interest and such further relief as the Court deems proper.

COUNT VI – Uniform Deceptive Trade Practices Act

33. Plaintiffs incorporate paragraphs 1 through 32 as Paragraph 33 of Count VI.

34. Defendants engaged in deceptive trade practices as defined under 815 ILCS 510/2(4) and (8), including by using "deceptive misrepresentations in connection with goods or services," and by "disparaging the goods, services or business of another by false or misleading representations of fact."

35. Plaintiffs are entitled to recover their actual damages, punitive damages and their attorney's fees under the Uniform Trade Practices Act as incorporated into 815 ILCS 505/10a.

WHEREFORE, Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU, request that this Court enter judgment in their favor and against the Defendant Eric Swanson, a/k/a TRUTHTELLER1790, a/k/a TRUTH TELLER, a/k/a TRUTH T., a/k/a Individual using a computer with IP Address 24.148.68.163 on January 21, 2011 in an amount in excess of \$50,000.00, plus punitive or exemplary damages in excess of \$50,000.00, plus attorney's fees, costs and post-judgment interest and such further relief as the Court deems proper.

COUNT VII – Trade Disparagement


36. Plaintiffs incorporate paragraphs 1 through 35 as Paragraph 36 of Count VII.

37. Defendant's conduct constitutes improper trade disparagement under the common law.

WHEREFORE, Plaintiffs, GUADAGNINI VIOLIN SHOP and CHUNYEE LU, request that this Court enter judgment in their favor and against the Defendant Eric Swanson, a/k/a TRUTHTELLER1790, a/k/a TRUTH TELLER, a/k/a TRUTH T., a/k/a Individual using a computer with IP Address 24.148.68.163 on January 21, 2011 in an amount in excess of \$50,000.00, plus punitive or exemplary damages in excess of \$50,000.00, plus attorney's fees, costs and post-judgment interest and such further relief as the Court deems proper.

Respectfully submitted,

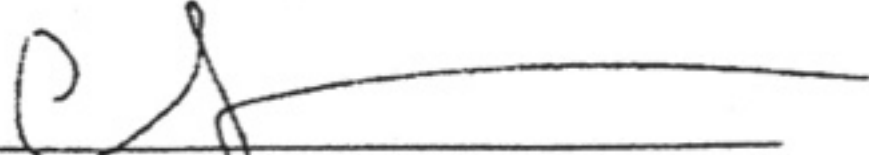
Guadagnini Violin Shop and
Chunye Lu


By one of their attorneys

James R. Branit
Litchfield Cavo LLP
303 West Madison Street, Suite 300
Chicago, Illinois 60606
(312) 781-6552
Law Firm No.: 36351
Attorneys for Petitioners Guadagnini Violin Shop and Chunye Lu

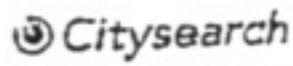
VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, I, Chunyee Lu, individually and on behalf of Guadagnini Violin Shop, certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Chunyee Lu

Dated: 2/6/2012



Chicago, IL

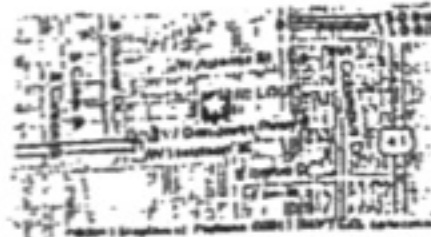
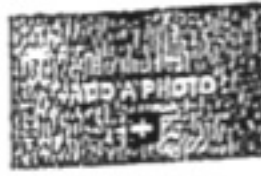
100%

CHICAGO

- RESTAURANTS
- RETAILERS
- RECREATION
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- TRAVEL
- ENTERTAINMENT

Guadagnini Violin Shop

1730 N. Taylor St. 1st Floor
 (312) 589-1856
 187 E. Superior St.
 Chicago, IL 60601
 ☑ GET DIRECTIONS
 ☑ ADD TO MY LIST



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USER REVIEWS (1)



Dangerously Dishonest!
by Tom1961175047

This store "shop" it is in the heart of Chicago (downtown) and they really do have a great selection of violins, cellos, and other instruments. They also have a great selection of accessories, and they are very knowledgeable. I would recommend this store to anyone who is looking for a great selection of instruments and accessories. They are very knowledgeable and they are very helpful.

1 helpful vote | 0 not helpful | 1 helpful | 0 not helpful

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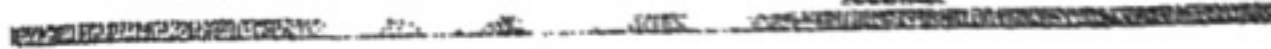
- **Green Dining in Chicago** by Tom1961175047
- **Shopping on a Budget in Chicago** by Tom1961175047
- **Music Venues in Chicago** by Tom1961175047

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- **TERMS OF SERVICE**
- **ADVERTISING**
- **HELP**
- **FAQ**





Guadagnini Violin Shop

1 review

Category: Musical Instruments & Teachers

407 S Dearborn Street
Chicago, IL 60605
Neighborhood: The Loop

(312) 588-1655

Nearest Transit:
Library (Orange, Brown, Purple Express, Pink)
Jackson (Blue, Red)
Adams/Wabash (Orange, Brown, Purple Express, Green, Pink)



Morris & Sons Co.



Category: Men's Clothing
Neighborhood: University Village

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Louis Tonok Fine Violins
1 review
Neighborhood: The Loop



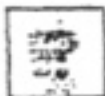
A 440 Violin Shop
5 reviews
Neighborhood: Roscoe Village



Beln & Fushi Rare Violins...
1 review
Neighborhood: The Loop

One review for Guadagnini Violin Shop

All Reviews



Truth T.
Chicago, IL

1/21/2011

Would you like to buy a gold mounted tortoise shell bow for \$4500 that is actually worth \$800 and is, in fact, made of gold-colored metal and faux-plastic shell? Then please go to this shop! Would you like to be told that your perfectly sound violin needs a new bassbar, costing over a thousand dollars? Step right up, because a sucker is born every minute. How about buying a "French" violin for \$20,000 that is actually a \$3000 German factory fiddle? AVOID THIS SHOP.

Was this review ...? Useful Funny Cool



Kudzu

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Guadagnini Violin Shop Inc



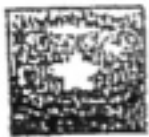
1 review

407 S Dearborn Street, Chicago, IL 60605

Phone: (866) 977-8043

Web: chicago.citysearch.com...

Reviews



Truthteller1790
Reviews: 1

Posted on 1/23/2011

RIPOFF ARTIST

Please don't go to this shop unless you want to be sold something which isn't what its purported to be for an outrageous price. They also will try to convince you your instrument needs a super expensive repair when it just needs an adjustment. Ripoff.

OVERALL

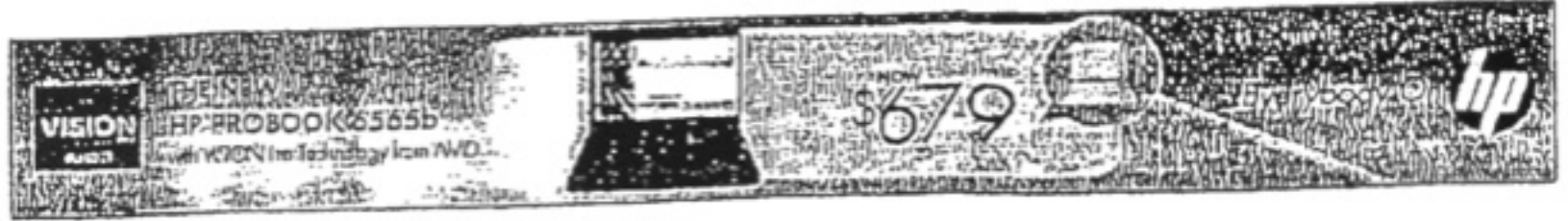


QUALITY ★☆☆☆☆

SERVICE ★☆☆☆☆

VALUE ★☆☆☆☆

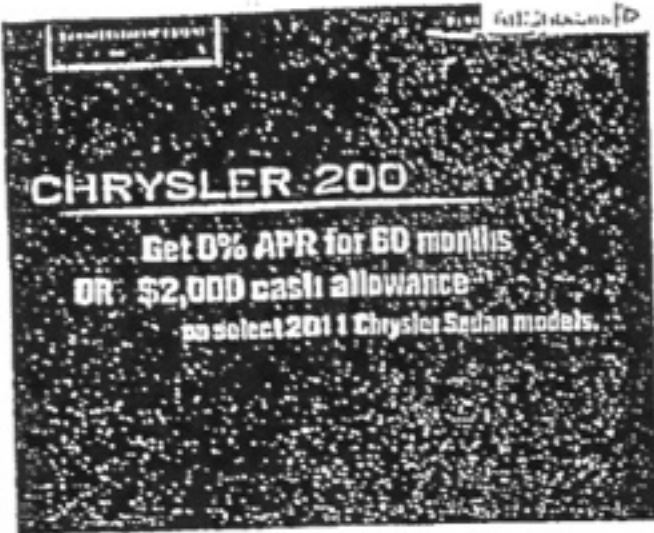




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Complaints

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Guadagnini Violin Shop

407 S Dearborn St
Chicago, IL 60605
312-588-1655

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- Much more

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Amazing Deals on a 2011 Vehicle Can Be Found at a Ford Dealer Now! www.LocalFordStores.com

Chevrolet Clearance Sale
Chevrolet Dealers are Slashing Prices. Get Your Chevrolet Here! Chevrolet.SmartAutoSavings.com

Acura TL Sedan
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Merchant Information

Violin, Fine Violins, Cellos & Bows, Maker-Restorer-Dealer, Expert Appraisals

Categories: Entertainment & Arts | Music

Tags: musical instrument, dealers, chicago



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Totally Dishonest

Please beware of this shop. They are in the habit selling overpriced instruments and bows that are often not made by



Talk to Me

Type here to talk to Guadagnini Violin Shop

(Max 200 characters)

[Submit Your Comment](#)

I HAVE A VIOLIN THAT HAS A LABEL, JOANNES BAPTISTA GUADAGNINI PLA- ON THE FIRST LINE, 2ND LINE HAS CENTINUS FECIT MEDIOLANI 1789. TO THE RIGHT IS A CIRCLE WITH A DOUBLED BARRED CROSS, GBG AND B P.

CAROL BROWN, April 22, 2010

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MerchantCircle Mayor of Chicago is Echo Limousine I



Chicago, IL 60631

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470

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Google Crawler Visits	12
Yahoo Crawler Visits	5
Total Ratings	2
Total Reviews	1

(Make in the last 30 days - updated nightly)

who they say they are. They also convince struggling musicians to spend tons of money on repairs that are not needed. There are so many reputable violin shops in Chicago - avoid this place please.

January 21, 2011 by Trull Taylor in Chicago, IL

Write a review for Guadagnini Violin Shop

Ads by Google

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Homeless Shelter Chicago
Breakthrough Urban Ministries Operates two homeless shelters. www.breakthrough.org/

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Explore Chicago!

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FILED-2
2012 FEB -7 AM 10:01
CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
LAW DIVISION

CLERK
NORTHY BROWN

CASE NO. 2012 L 000802

333 1871
2870



GUADAGNINI VIOLIN SHOP, and)
CHUNYEE LU)
_____)
Plaintiffs,)
)
ERIC SWANSON, a/k/a)
TRUTHTELLER1790, a/k/a)
TRUTH TELLER, a/k/a)
TRUTH T., a/k/a)
Individual using IP address 24.148.68.163)
on January 21, 2011,)
)
Defendant.)

NOTICE OF FILING

PLEASE TAKE NOTICE that on February 7, 2012, we filed with the Clerk of the Circuit Court of Cook County, Illinois, County Department, Law Division, Plaintiffs' Amended Verified Complaint, a copy of which is attached hereto and hereby served upon you.

**Plaintiffs, Guadagnini Violin Shop
and Chunyee Lu**

By: James R. Branit
One of Its Attorneys

James R. Branit
Litchfield Cavo LLP
303 W. Madison, Suite 300
Chicago, Illinois 60606
Phone: (312) 781-6552
Fax: (312) 781-6630
Firm I.D. No.: 36351

CERTIFICATE OF SERVICE

I, Cynthia A. Miller, a non-attorney, under oath, state that I caused to be served the foregoing document in the above-captioned case, on the above listed parties, by depositing same in the U.S. Mailbox, located in the building at 303 West Madison Street, Chicago, Illinois 60606, properly addressed and with proper postage prepaid, at or before the hour of 5:00 p.m. on February 7, 2012.

Cynthia A. Miller
[x] Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statement set forth herein is true and correct.