COMMONWEALTH OF MASSACHUSETTS

| MIDDLESEX, SS. | SUPERIOR COURT Civ. Action No. 19-729 |
|---|---------------------------------------|
| JAMIE GENEREUX, and PACKLEADER PETTRACKERS, Plaintiffs, | |
| v. |)) |
| MISSING DOGS MASSACHUSETTS CORPORATION; WORCESTER DIGITAL MARKETING LLC F/K/A TURTLEBOY DIGITAL MARKETING LLC; KRISTIN ERICSON; MELINDA LAWRENCE; DAWN TITUS-BANKERT; KATHY LEBLANC; KAREN HOMER MONTEIRO; JUDITH WILSON; DONNA HURLEY; SHEILAH GRAHAM; VICTORIA CALLAHAN; and STEFANI LYDON-TREMOULIARIS | MAR 14 2019 Mar 14 2019 Mar 14 2019 |
| Defendants. |)) |

VERIFIED COMPLAINT

INTRODUCTION

The Plaintiff, Jamie Genereux ("Genereux"), brings this action to recover damages, inter alia, based on the false and defamatory statements that the individual Defendants have published about him which have caused him to suffer reputational harm, professional and emotional injuries, and financial losses. Genereux also brings similar claims for defamation against the corporate Defendants who, via their agents, employees, and representatives, likewise published false and defamatory statements about him and which have caused him to suffer reputational harm, professional and emotional injuries, and financial losses.

DOCKET NUMBER Trial Court of Massachusetts CIVIL TRACKING ORDER 1981CV00729 (STANDING ORDER 1-88) The Superior Court CASE NAME: Michael A. Sullivan, Clerk of Court Jamie Genereux vs. Missing Dogs Massachusetts Corporation Middlesex County TO: Damon M Seligson, Esq. COURT NAME & ADDRESS Middlesex County Superior Court - Woburn DiNicola, Seligson & Upton, LLP 200 Trade Center 6 Beacon St Woburn, MA 01801 Suite 700 Boston, MA 02108

TRACKING ORDER - A - Average

You are hereby notified that this case is on the track referenced above as per Superior Court Standing Order 1-88. The order requires that the various stages of litigation described below must be completed not later than the deadlines indicated.

STAGES OF LITIGATION

DEADLINE

A. SPORT

| | SERVED BY | FILED BY | HEARD BY |
|---|------------|--|------------|
| Service of process made and return filed with the Court | | 06/12/2019 | |
| Response to the complaint filed (also see MRCP 12) | | 07/12/2019 | |
| All motions under MRCP 12, 19, and 20 | 07/12/2019 | 08/12/2019 | 09/10/2019 |
| All motions under MRCP 15 | 05/07/2020 | 06/08/2020 | 06/08/2020 |
| All discovery requests and depositions served and non-expert depositions completed | 03/03/2021 | | |
| All motions under MRCP 56 | 04/02/2021 | 05/03/2021 | |
| Final pre-trial conference held and/or firm trial date set | | | 08/30/2021 |
| Case shall be resolved and judgment shall issue by | | | 03/14/2022 |
| | A. M.A. | Processing the control of the contro | |

The final pre-trial deadline is <u>not the scheduled date of the conference</u>. You will be notified of that date at a later time. Counsel for plaintiff must serve this tracking order on defendant before the deadline for filing return of service.

This case is assigned to

DATE ISSUED ASSISTANT CLERK PHONE

03/14/2019 Arthur T DeGuglielmo (781)939-2757

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

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| Plaintiffs, |
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| Defendants. |

VERIFIED COMPLAINT

INTRODUCTION

The Plaintiff, Jamie Genereux ("Genereux"), brings this action to recover damages, *inter alia*, based on the false and defamatory statements that the individual Defendants have published about him which have caused him to suffer reputational harm, professional and emotional injuries, and financial losses. Genereux also brings similar claims for defamation against the corporate Defendants who, via their agents, employees, and representatives, likewise published false and defamatory statements about him and which have caused him to suffer reputational harm, professional and emotional injuries, and financial losses.

Additionally, Genereux, who is the principal owner of Plaintiff, PackLeader PetTrackers ("PPT"), seeks to recover damages on behalf of his company, based on the manner in which PPT likewise has been defamed by all of the Defendants.

Furthermore, the Plaintiffs seek to recover damages against all of the Defendants for commercial disparagement and for tortious interference with advantageous business relations based on the same wrongful conduct. The Plaintiffs also assert claims under G.L. c. 93A based on the unfair and deceptive manner in which the corporate Defendants mistreated them, *inter alia*, by disparaging and defaming them, and via a concerted and calculated effort aimed at sullying Genereux's good name by publicly describing him as a "scam artist" and a "con man", and by discouraging dog owners from employing his services thereby depriving him and PPT from doing business.

Finally, the Plaintiffs seek injunctive relief in the form of a Court order mandating that each of the Defendants immediately take active steps to remove any and all such offending, false and defamatory content concerning either or both of the Plaintiffs, regardless of the location or the form, from all traditional media, social media and digital platforms.

PARTIES

- 1. Plaintiff Genereux is an individual who resides at 16 Barberry Hill Road, Cumberland, Rhode Island.
- 2. Plaintiff PPT is a sole proprietorship, with a principal place of business at 16 Barberry Hill Road, Cumberland, Rhode Island.
- 3. Defendant, Missing Dogs Massachusetts Corporation ("MDM") is a duly organized Massachusetts entity with a principal place of business located at 240 Elliott Street, Newton, Middlesex County, Massachusetts.

- 4. Defendant, Worcester Digital Marketing, LLC f/k/a Turtleboy Digital Marketing, LLC ("Turtle Boy") is, upon information and belief, a duly organized Massachusetts entity with a principal place of business located at 2 Foster Street, Worcester, Massachusetts
- 5. Defendant, Judith Wilson ("Wilson"), is, upon information and belief, an individual with a residential address at 20 Compass Lane, Dennis, Massachusetts.
- 6. Defendant, Melinda Lawrence ("Lawrence"), is, upon information and belief, an individual with a residential address at 77 Morse Avenue, Attleboro, Massachusetts.
- 7. Defendant, Dawn Titus-Bankert ("Titus-Bankert"), is, upon information and belief, an individual with a residential address at 42 Pratt Lane, North Attleboro, Massachusetts.
- 8. Defendant, Kathy LeBlanc ("LeBlanc"), is, upon information and belief, an individual with a residential address at 211 West Street, Unit 11B, Quincy, Massachusetts.
- 9. Defendant, Karen Homer Monteiro ("Monteiro"), is, upon information and belief, an individual with a residential address at 26 Camp Street, Hyannis, Massachusetts.
- 10. Defendant, Donna Hurley ("Hurley"), is, upon information and belief, an individual with a residential address at 44 Butler Road, Weymouth, Massachusetts.
- 11. Defendant, Sheilah Graham ("Graham"), is, upon information and belief, an individual with a residential address at 116 Van Zandt Avenue, Warwick, Rhode Island.
- 12. Defendant, Victoria Callahan ("Callahan"), is, upon information and belief, an individual with a residential address at 24 Edwards Road, Foxboro, Massachusetts.
- 13. Defendant, Stefani Lydon-Tremouliaris ("Lydon-Tremouliaris"), is, upon information and belief, an individual with a residential address at 87 Adams Avenue, Pembroke, Massachusetts.

14. Defendant, Kristina Ericson ("Ericson"), is, upon information and belief, an individual with a residential address at 2 Murdock Drive, Peabody, Massachusetts.

FACTS RELEVANT TO ALL COUNTS

Genereux and PPT.

- 15. Genereux is a lifelong hunter and hunting dog trainer with decades of experience training and handling off-leash canines to follow scent and handler direction.
- 16. He is a former licensed private investigator who worked in the field for almost a decade.
- 17. Since approximately 2006, Genereux has worked as a canine search and rescue professional, including working with Rhode Island Canine Search and Rescue ("RICSAR"), a nonprofit search and rescue organization utilized by the State of Rhode Island for human search and rescue, including wilderness search and rescue, urban search and rescue, water rescue/recovery and cadaver search and recovery.
- 18. In 2010, he launched PPT, which has since grown into a successful, well-recognized and well-respected company.
- 19. Prior to the relevant time period the reputations of both Plaintiffs were unblemished and both were held in high regard in the professional community involving search and rescue of missing canines.

MDM and its Agents, Representatives and Volunteers.

- 20. According to its Internet website, MDM holds itself out as "an all-volunteer, non-profit organization that works to reunite missing and found dogs with their families."
- 21. According to its Internet website, MDM publicly states that it "works cooperatively with animal control officers, rescues, shelters, law enforcement, and the media."

- 22. Furthermore, according to its Internet website, "MDM works through social media (Facebook & Twitter) to raise awareness of currently missing dogs, and dogs that have been found and are in search of their family."
- 23. Despite Genereux's well-earned reputation, MDM, through its directors, volunteers and other affiliated individuals, has repeatedly taken to Internet websites and social media to post *ad hominem* attacks against Genereux, his company and his profession.
- 24. MDM, which is a resource for many lost dog owners in Massachusetts and other surrounding states, maintains that in 2017 it received more than 1800 lost or found dog forms, which owners fill out so their missing pet's poster can be included on MDM's social media and online properties.
- 25. MDM further promotes that it reaches out to every owner whose dog is posted on its page.
- 26. When MDM makes this initial contact, these owners are distraught, vulnerable and simply want their lost pet to be found and brought home.
- 27. Based on this guaranteed initial interaction by MDM with lost pet owners, at the outset of the owner's search process, upon information and belief, MDM has used this opportunity to cast doubt on Genereux's skills, to falsely and improperly disparage him and PPT, and to scare and mislead lost pet owners about his qualifications, credibility and character in particular, and missing pet search dog services in general.
- 28. Additionally, at all relevant times, MDM's social media and internet presence via its directors and volunteers provided a constant platform for the repeated dissemination of false, harmful and commercially disparaging content about Genereux and PPT.

- 29. By way of example, MDM volunteers and directors have openly described Genereux (and PPT) as a "scam artist" and a liar. See **Exhibit A**, appended hereto.
- 30. They have described him as a "troll" who stages "photo-ops" aimed at misleading the public. See **Exhibit B**, appended hereto.
 - 31. They have described him as a "predator". See **Exhibit C**, appended hereto.
- 32. They have described him as someone whose behavior is "criminal" charging "\$500 just to walk up to your front door..." and someone who "should be in jail". See **Exhibit D**, appended hereto.
 - 33. Such statements are false, misleading and disparaging.
 - 34. Such statements are not conditionally privileged.
- 35. Such statements were published by MDM's directors and volunteers on the internet and on various social media platforms, including Facebook and other websites.

Turtle Boy's Publications.

- 36. Turtle Boy is a digital media publisher that post articles and other forms of content on the internet.
- 37. Onor about August 9, 2018, Turtle Boy published an article titled "Off Leash K9 Training And Associates Expose To Come [sic] In A Several Part Series Detailing Allegations Of Abuse, Missing Dogs and Death" and "Off Leash K9 Training, LLC Exposed Part 1: The Story Of Knox And The Bootleg Trainer Amelia Ferreira Who Is Responsible For His Death," written by Esther Manchester.
- 38. Turtle Boy utilizes various forms of linkage and metadata so that readers can see the article, including the posts, comments and associated information that refers to or links to this article. The articles at issue are appended hereto as **Exhibit E**.

- 39. The articles at issue contain statements and assertions that are false and defamatory, including promising readers that an "investigation into [PPT] is going to be enraging"; that Genereux "likes to take credit for other people's finds" and "will readily charge an insane amount of money to produce nothing," and disparaging Genereux's expertise, skill and competence. See **Exhibit F**, appended hereto.
- 40. With the exception of his name and the company's name, every other statement made in the articles concerns Genereux, PPT, and Genereux's work in general, as well as false and defamatory statements about Genereuex's work on the case of former New England Patriot Jerod Mayo's, missing bulldog Knox, is false.

The Individual Defendants.

- 41. Defendant Monteiro has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "scam artist" who "preys on people desperately looking for their lost pets". See **Exhibit G**, appended hereto.
- 42. Defendant Monteiro has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 43. Defendant Monteiro's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 44. Defendant Monteiro's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.
- 45. Defendant Graham has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "troll" who stages "photo-ops" aimed at

misleading the public; that he forces lost pet owners to "open a gofundme" website to pay for his services only to then desert the client when the funds are depleted. See **Exhibit H**, appended hereto.

- 46. Defendant Graham has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 47. Defendant Graham's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 48. Defendant Graham's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.
- 49. Defendant Lydon-Tremouliaris has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "scammer" and a "scam artist" who seeks to "get rich" by having the vulnerable pet owners "drain their savings" to pay for his questionable services. See **Exhibit I**, appended hereto.
- 50. Defendant Lydon-Tremouliaris has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 51. Defendant Lydon-Tremouliaris' public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 52. Defendant Lydon-Tremouliaris' false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.

- 53. Defendant Callahan has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "liar" and someone who "should be in jail". See **Exhibit J**, appended hereto.
- 54. Defendant Callahan has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 55. Defendant Callahan's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 56. Defendant Callahan's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.
- 57. Defendant Ericson has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "criminal" who "should be in jail" because he takes advantage of vulnerable and distraught lost pet owners. See **Exhibit K**, appended hereto.
- 58. Defendant Ericson has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 59. Defendant Ericson's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 60. Defendant Ericson's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.

- 61. Defendant Hurley has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "sociopath" and a "fraud". See **Exhibit L**, appended hereto.
- 62. Defendant Hurley has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 63. Defendant Hurley's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 64. Defendant Hurley's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.
- 65. Defendant LeBlanc has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "predator" with a "personality disorder" who takes advantage of people who have lost their pets. See **Exhibit M**, appended hereto.
- 66. Defendant LeBlanc has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 67. Defendant LeBlanc's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 68. Defendant LeBlanc's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.

- 69. Defendant Titus-Bankert has publicly defamed Genereux and PPT by falsely describing Genereux on one or more social media platforms as a "con artist" who "rips people off when they're vulnerable". See **Exhibit N**, appended hereto.
- 70. Defendant Titus-Bankert has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 71. Defendant Titus-Bankert's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 72. Defendant Titus-Bankert's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.
- 73. Defendant Lawrence has publicly defamed Genereux and PPT by falsely describing Genereux's work and PPT on one or more social media platforms as a "fraud" needing to be exposed. See **Exhibit O**, appended hereto.
- 74. Defendant Lawrence has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 75. Defendant Lawrence's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion.
- 76. Defendant Lawrence's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.

- 77. Defendant Wilson has publicly defamed Genereux and PPT by falsely describing Genereux's work and PPT on one or more social media platforms as someone who "lied . . . many times" and was "being investigated in the Knox case (Jarod [sic] Mayo's bulldog that was found dead)" See **Exhibit P**, appended hereto.
- 78. Defendant Wilson has publicly and falsely defamed the Plaintiffs by characterizing them as dishonest, untrustworthy and fraudulent.
- 79. Defendant Wilson's public statements are false and defamatory; they were made without justification under any conditional privilege; and are neither protected speech nor opinion. Defendant Wilson's false and defamatory statements have caused the Plaintiffs to suffer damages, including without limitation, reputational harm, emotional distress, and loss of business revenues.

COUNT I (Defamation – MDM)

- 80. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 79 as if fully set forth herein.
- 81. MDM, through its duly authorized agents, servants and representatives, published one or more false and defamatory statements about the Plaintiffs in various online websites and online social media, as well as directly to third parties.
- 82. Such improper and wrongful conduct caused the Plaintiffs to suffer economic loss and reputational harm.
- 83. The statements at issue are the type that would tend to hold the Plaintiffs up to scorn, hatred, ridicule or contempt, in the minds of any considerable and respectable community.
 - 84. The statements at issue are false and defamatory.

- 85. The Plaintiffs, individually and collectively, have suffered economic loss and reputational harm as a direct and proximate result of these overt acts.
- 86. Genereux has likewise suffered emotional distress as a direct and proximate result of the unlawful and improper conduct detailed herein.

WHEREFORE, the Plaintiffs are entitled to recover damages against MDM, including attorney's fees, interest and costs.

<u>COUNT II</u> (<u>Defamation – Turtle Boy</u>)

- 87. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 86 as if fully set forth herein.
- 88. Turtle Boy, through its duly authorized agents, servants and representatives, published one or more false and defamatory statements about the Plaintiffs in various online websites and online social media, as well as directly to third parties.
- 89. Such improper and wrongful conduct caused the Plaintiffs to suffer economic loss and reputational harm.
- 90. The statements at issue are the type that would tend to hold the Plaintiffs up to scorn, hatred, ridicule or contempt, in the minds of any considerable and respectable community.
 - 91. The statements at issue are false and defamatory.
- 92. The Plaintiffs, individually and collectively, have suffered economic loss and reputational harm as a direct and proximate result of these overt acts.
- 93. Genereux has likewise suffered emotional distress as a direct and proximate result of the unlawful and improper conduct detailed herein.

WHEREFORE, the Plaintiffs are entitled to recover damages against Turtle Boy, including attorney's fees, interest and costs.

COUNT III (Defamation – The Individual Defendants)

- 94. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 93 as if fully set forth herein.
- 95. As is set forth herein, Monteiro, Graham, Callahan, Lydon-Tremouliaris, LeBlanc, Ericson, Hurley, Titus-Bankert, Lawrence, and Wilson (collectively, the "Individual Defendants") have each, separately and independently, published false and defamatory statements of and concerning Genereux and PPT, including posting improper, untrue and defamatory content on various social media platforms such as Facebook, as well as directly to third parties.
- 96. As is set forth herein, the content that each of the Individual Defendants has posted online and published to third parties is false and defamatory, casts the Plaintiffs in an unfavorable and unflattering light, and is not conditionally privileged, or otherwise protected opinion of free speech.
- 97. The false and defamatory statements that the Individual Defendants have posted online and published to third parties of and concerning the Plaintiffs have caused the Plaintiffs to incur reputational harm and suffer loss of business.
- 98. The false and defamatory statements that the Individual Defendants have posted online and published have also caused Genereux to suffer emotional distress.

WHEREFORE, the Plaintiffs are entitled to recover damages against each of the Individual Defendants, individually, including attorney's fees, interest and costs.

<u>COUNT IV</u> (Commercial Disparagement – MDM)

- 99. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 98 as if fully set forth herein.
- 100. MDM, through its duly authorized agents, servants and representatives, published one or more false and defamatory statements about the Plaintiffs in various online websites and online social media, as well as directly to third parties.
- 101. The purpose of MDM in publicizing such false, defamatory and disparaging content and information about the Plaintiffs was intended to harm the Plaintiffs, including negatively impacting their pecuniary interests.
- 102. MDM knew or should have known that such false, defamatory and disparaging statements or content that was published would harm the Plaintiffs' pecuniary interests.
- 103. The statements and content that MDM did publish served to harm the Plaintiffs, including harming their reputations and pecuniary interests.
- 104. Genereux has likewise suffered emotional distress as a direct and proximate result of the unlawful and improper conduct detailed herein.

WHEREFORE, the Plaintiffs are entitled to recover damages against MDM, including attorney's fees, interest and costs.

<u>COUNT V</u> (Commercial Disparagement – Turtle Boy)

105. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 104 as if fully set forth herein.

- 106. Turtle Boy, through its duly authorized agents, servants and representatives, published one or more false and defamatory statements about the Plaintiffs in various online websites and online social media, as well as directly to third parties.
- 107. The purpose of Turtle Boy in publicizing such false, defamatory and disparaging content and information about the Plaintiffs was intended to harm the Plaintiffs, including negatively impacting their pecuniary interests.
- 108. Turtle Boy knew or should have known that such false, defamatory and disparaging statements or content that was published would harm the Plaintiffs' pecuniary interests.
- 109. The statements and content that Turtle Boy did publish served to harm the Plaintiffs, including harming their reputations and pecuniary interests.
- 110. Genereux has likewise suffered emotional distress as a direct and proximate result of the unlawful and improper conduct detailed herein.

WHEREFORE, the Plaintiffs are entitled to recover damages against Turtle Boy, including attorney's fees, interest and costs.

COUNT VI (Violation of G.L. c. 93A – MDM)

- 111. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 110 as if fully set forth herein.
- 112. At times relevant to the facts and claims pled in this Complaint, MDM was "engaged in trade or commerce" as that phrase is interpreted under G.L. c. 93A.
- 113. MDM's acts and omissions, as described herein, including without limitation, the manner in which its officers, directors, agents, servants, employees and/or volunteers have actively undertaken to discourage lost dog owners from using the services of the Plaintiffs

coupled with a systemic and ongoing pattern aimed at publicly disparaging Genereux as a pet tracker and rescuer, constitute "unfair and deceptive" trade practices under G.L. c. 93A.

- 114. The unfair and deceptive trade practices alleged herein took place substantially and primarily in the Commonwealth of Massachusetts, including via the use of the Internet and various online social media platforms such as Facebook.
- 115. The facts, acts and omissions detailed herein that form the basis of the Plaintiffs' claims for violations of G.L. c. 93A have caused the Plaintiffs to suffer loss of business and reputational harm, and have caused Genereux to suffer emotional distress.
- 116. By letter, dated November 19, 2018, sent via certified mail, the Plaintiffs served MDM with written notice of their claims under G.L. c. 93A. See **Exhibit Q**, appended hereto.
- 117. By letter, dated December 31, 2018, MDM responded by denying the Plaintiffs' claims. See **Exhibit R**, appended hereto.

WHEREFORE, the Plaintiffs are entitled to recover damages against MDM for violations of G.L. c. 93A, including multiple damages, attorney's fees, interest and costs.

<u>COUNT VII</u> (Violation of G.L. c. 93A – Turtle Boy)

- 118. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 117 as if fully set forth herein.
- 119. At times relevant to the facts and claims pled in this Complaint, Turtle Boy was "engaged in trade or commerce" as that phrase is interpreted under G.L. c. 93A.
- 120. Turtle Boy's acts and omissions, as described herein, including without limitation, the manner in which it published an article that contains claims, allegations and assertions about the Plaintiff that are significantly harmful, hurtful, false and defamatory, constitute "unfair and deceptive" trade practices under G.L. c. 93A.

- 121. The unfair and deceptive trade practices alleged herein took place substantially and primarily in the Commonwealth of Massachusetts, including via the use of the Internet and various online social media platforms such as Facebook.
- 122. The facts, acts and omissions detailed herein that form the basis of the Plaintiffs' claims for violations of G.L. c. 93A have caused the Plaintiffs to suffer loss of business and reputational harm, and have caused Genereux to suffer emotional distress.
- 123. By letter, dated November 19, 2018, sent via certified mail, the Plaintiffs served Turtle Boy with written notice of their claims under G.L. c. 93A. See **Exhibit S**, appended hereto.
- 124. Upon information and belief, despite receipt of the Plaintiffs' demand under G.L. c. 93A, Turtle Boy chose not to respond.

WHEREFORE, the Plaintiffs are entitled to recover damages against Turtle Boy for violations of G.L. c. 93A, including multiple damages, attorney's fees, interest and costs.

<u>COUNT VIII</u> (<u>Tortious Interference With Advantageous Business Relations – MDM</u>)

- 125. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 124 as if fully set forth herein.
- 126. Genereux, through his years of experience, has earned a positive reputation and a substantial amount of goodwill in the small and close-knit industry that deals with the search for and rescue of lost canines in and around Rhode Island, Massachusetts, New York, Connecticut and New Hampshire.
- 127. MDM, through its agents, representatives, servants and volunteers, have embarked on a systemic campaign aimed at dissuading, discouraging and at times even

threatening or scaring lost dog owners from utilizing Genereux and PPT to search for their lost canines.

- 128. As is alleged herein, the pattern of systemic behavior has included the use of online social media platforms such as Facebook to post false and defamatory statements about the Plaintiffs, communicating such false, defamatory and misleading information about PPT directly to potential clients of the Plaintiffs and stating they will withdraw their assistance if the Plaintiffs' services are used.
- 129. As the primary and dominant source and platform for lost dog owners to post and share information and posters of their missing dog (to help create awareness and locate a lost canine), with MDM reaching out to every owner whose lost dog is posted on its page, and/or with lost dog owners relying on MDM to obtain information about the various ways to go about finding a lost dog, MDM stands in a unique and influential position as gatekeeper between owners and any other services, including professional pet trackers with specialized missing pet search dogs, available to distraught lost dog owners to help find their missing pet.
- 130. MDM uses this position to interfere with the Plaintiffs' ability to do business, including disparaging Genereux and his company, casting the Plaintiffs in a negative light through lies and deception, and suggesting to the public that they are fraudulent, dishonest, unskilled and untrustworthy.
- 131. As a direct and proximate result of this type of campaign, MDM has attempted to eliminate Genereux and PPT as a competitor and with the objective of essentially destroying his ability to earn a living.

- 132. As a direct and proximate result of the MDM's misconduct, the Plaintiffs' prospective business advantage may be irretrievably lost and Genereux's ability to earn a living irreparably damaged.
- 133. The Plaintiffs have indeed lost business opportunities and lost revenues as a direct and proximate result of such misconduct.

WHEREFORE, the Plaintiffs are entitled to recover damages against MDM, including attorney's fees, interest and costs.

<u>COUNT VIII</u> (<u>Injunctive Relief – All Defendants</u>)

- 134. The Plaintiffs repeat, restate and reallege each and every fact and assertion in paragraphs 1 through 133 as if fully set forth herein.
- 135. The false and defamatory statements that all of the Defendants have posted online on the Internet and on various social and traditional media platforms, such as on Facebook and in online "news" sources such as the website owned and operated by Turtle Boy, and published directly to third parties, have caused substantial and irreparable harm to the Plaintiffs, and to Genereux in particular.
- 136. The harm to his reputation continues to this day because the offending content continues to be accessible via a straightforward search for his name and via continuation of publication to third parties.
- 137. The prejudice to the Plaintiffs, and to Genereux in particular, substantially outweighs any claim of protected speech that the Defendants may seek to preserve because the content they have posted and published online and to third parties in false and defamatory, and therefore, is not protected.

138. The Defendants must be ordered to remove all such offensive content regarding the Plaintiffs from all online sources, and likewise they must be enjoined from posting and publishing to any third parties any such offensive, false and defamatory content regarding either Genereux or PPT in the future.

WHEREFORE, the Plaintiffs respectfully request that the Court use its equitable power to order the appropriate injunctive relief requested herein.

THE PLAINTIFFS REQUEST A TRIAL BY JURY ON ALL ISSUES SO TRIABLE

The Plaintiffs,

JAMIE GENEREUX, and PACKLEADER PETTRACKERS,

By their Attorney,

Damon M. Seligson, Esq. (BBO #632763) DINICOLA, SELLOSON & UPTON, LLP

6 Beacon Street, Suite 700

Boston, MA 02108 Tel: 617-279-2592

Fax: 617-482-0587

damon.seligson@dsu-law.com

Date: March 4, 2019

VERIFICATION

I, Jamie Genereux, hereby state:

I have read the foregoing complaint, which I declare to be true and correct to the best of my knowledge, information and belief.

SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY UNDER THE LAWS OF THE STATE OF RHODE ISLAND AND THE UNITED STATES.

Executed on _____ February 2019 at 16 Barberry Hill Road, Cumberland, Rhode Island.

Jamie Genereux

EXHIBIT A





Missing Dogs Massachusetts July 12 ⋅ 🚱

~* Please focus on sharing to help find Knox. Negative comments are not productive and will not aid law enforcement in solving this case. Instead of commenting, please share! *~ 7-12-18

An Update from Jerod & Chantal Mayo concerning the disappearance of their English Bulldog, "Knox", while under the care of Off Leash K9 Training-Providence (physical location – Cranston, RI)

These are the known facts in the case as of today:

Due to housebreaking issues following the arrival of a new baby, the family sought the advice of a trainer for Knox.

Based on reviews/testimonials and described qualifications, Off Leash k9 Training –Providence' two week board/train program was selected. Off Leash Training Providence is a franchised partner of Off Leash K9 Training, Woodbridge, VA. Payment was made and accepted, and Knox was placed in the care of said trainer in the middle of April.

At the conclusion of the training period, Knox was returned home, without the pre-paid equipment or training outline that had been promised so that the Mayo family could continue and reinforce Knox' training. After multiple requests directed to the trainer regarding the above items went unanswered, she finally responded and excused her tardiness with the excuse of a family emergency.

Since Knox's training at home had now lagged, and

















Lori O'Neil

Wait, so the tracker actually fied then just saying the dog was found? Then the trainer fully admitted he was never there in Wrentham?

9v



Missing Dogs Massachusetts Yes - that is our understanding via the family's statement

9w



Lori O'Neil Missing Dogs Massachusetts unbelievable...

9w



Victoria Lynne

Yup! Found pieces of him and everything. Told him he was at the bottom of the lake and family had Dive Team come out... nothing. Then trainer spoke up and refuses to talk anymore.

9w

₩ 12 2



Sammy Conroy All I can say is "Wow"

9w



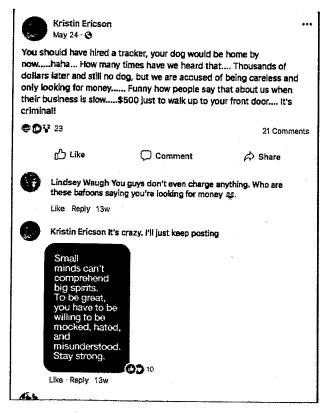




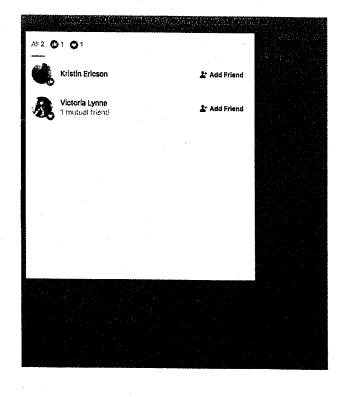














7-12-18 HELP US FIND KNOX!

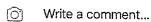
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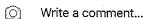
In addition, the family was told that a local scent tracking dog, paid for by Off Leash Corporate, had pulled remains of Knox from the pond at Joe's Rock, and that based on the tracking dogs reliability, his body remained at the bottom of the pond. The family was told that they would be given no further information as they weren't the party that paid for the tracking services.

The Mayo family, desperate to get their beloved dog/ family member back, and to obtain closure, hired a dive team to search the pond. The dive team reported that there was no deceased dog, or any animal found in the pond.

Fast forward a few days, some extensive police work, & research and footwork by many; became known that this trainer was due in court today (7-12-18) for running an unlicensed kennel and was seen on surveillance video at her home in Cranston around the time that Knox was described as "missing" from Wrentham.

The police again questioned the trainer, and she then formally admitted that she made the whole story up! Knox was NEVER AT JOE'S ROCK in Wrentham.

She gave an official statement at the Cranston Police station on Monday 7-9-18. In her statement, she claims that Knox was last seen at her residence in



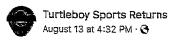












Part 3 of Exposing Off Leash K9 Training LLC: Baloo's story and more:





TURTLEBOYSPORTS.COM

Exposing Off Leash K9 Training LLC Part Three: Former Employees Come Forward, Becca The Beast Fired, And ... Story

0 = 2 47

29 Comments 17 Shares

Like

Comment Comment

⇔ Share





Karen Homer Monteiro When is the article about the scam artist Jamie from Pack Leaders pet tracking coming out? He's such a scam that preys on people desperately looking for their lost pets . He said another persons pet was dead and it walked into a store shortly after . Blows my mind he said Knox drowned in this pond when Knox was never even there to begin with

Like · Reply · 5h

⟨ Helping Lost/Found Pets On Cape Cod...

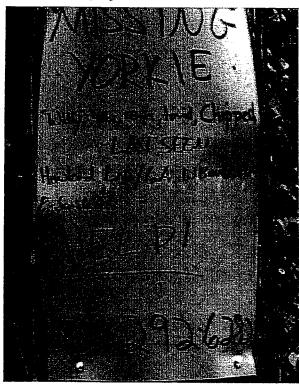




Jackie-Matt Loomis F Helping Lost/Found Pets On Cape Cod Get Back Home .

August 1 at 6:31 PM + 6

These are all over East Sandwich I hope he is found! Keep your eyes open!





Open

Helping Lost/Found Pets On Cape Cod...





📲 Verizon 🗢

Denise Lauren

This person should contact Jamie he will find the dog good or bad. This is his info

17 hrs Like More



Denise Lauren



Jamie Genereux



17 hrs Like More



Karen Homer Monteiro

I would not ever recommend Jamie and Pet Trackers

17 hrs Like More



Karen Homer Monteiro

He's also being investigated in the Knox case (Jarod Mayo's bulldog that was found dead)

17 hrs Like More



Denise Lauren

Ok so sorry I do know he found lioness last



Open





17 hrs Like More



Karen Homer Monteiro

He's also being investigated in the Knox case (Jarod Mayo's bulldog that was found dead)

17 hrs Like More



Denise Lauren

Ok so sorry I do know he found lioness last year

17 hrs Like More



Karen Homer Monteiro

Denise Lauren he also lied to Steve many times

16 hrs Like More



Karen Homer Monteiro

Denise Lauren not DCX , Lioness's Owner Steve , sorry for confusion

15 hrs Like More



Judith Wilson

Denise Lauren he did not find lioness there were calls of sightings he set Cathy's own trap at the sighting area and caught him in the trap!!

It had nothing to do with tracking at all. FYI

12 hrs Like More



Open





RANT: Long over due - read it and deal with it, you don't want to read it, simply scroll by.. I could care less either way.. This simply has to be addressed. No better time than the present.

So fairly recently I have been asked to assist with lost dogs pretty much locally, however, I am able to guide those across country as well (atleast there is no resistance/hesitation with those owners, and they do EVERYTHING they need to do). People reach out to me to assist, friends suggest owners reach out to me to assist etc. Some simply find me on Facebook or through Google. I Volunteer (that is right, I don't get paid one penny to assist you) my time to assist each and every one of them as best I can. You receive special flyers since the ones you most of the time are useless and cluttered (not intentional, since you are doing the best you can), with special tasks to be undertaken to bring your lost dog home. A map is set up to monitor and track your dogs progress and travel patterns. Some of you go above and beyond and get your pup home sooner, others drag their feet, and it takes a bit longer, some of you don't do anything, so why should !?!? Then the last group of people decide after we have started working through the process with them, that they simply want to invest and "Hire" a different option for their search process. In all honesty, as I have stated before, I don't care how your

















Sheilah Graham August 3 at 4:17 PM · 🚱

RANT: Long over due - read it and deal with it, you don't want to read it, simply scroll by. I could care less either way. This simply has to be addressed. No better time than the present.

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Volunteering their time, while this other person charges approximately \$100 an hour for a stroll with their pup, if they even utilize them at all.. Which currently will also run you a 3 days rate of \$100 a day MINIMUM. Oh, and if they leave equipment, they will charge you for that too. That is one of the many difference between Volunteering ones time and efforts to assist a devastated family, instead of causing them to spend their hard earned money on something they are quite capable of doing on their own.. However, this person misleads them in to thinking that this infact is not possible. How wrong this is. This is how desperate they are. They are gullible to what this asshat says. I am a huge fan of KARMA, she is relentless, and this person will get theirs in due time. Sadly not soon enough.

As an owner you need to do what you feel is right... I tell you this right up front, I can only offer you suggestions, what you do with it is up to you. No regrets... However, be open and honest with me. You want to utilize a different option, have the integrity and decency to tell me up front before you take all the info! have to offer you. Let your paying person provide you with their information or tips to guide you. Only thing I ask, keep me up to date with your progress and sightings. I have no desire to interfere with your process, I simply wan tot be up to speed incase your paid party deserts you in the middle with no results.. This saves time, since I won't have to piece everything together again and is critical for your



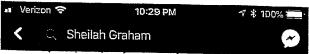












no results.. This saves time, since I won't have to piece everything together again and is critical for your pups safety. I, unlike others, do not interfere when someone else is already working with a family.

Any dog that is lost and moving around, sees anything as a Predator. They will not allow their own humans to approach them, let alone a stranger and their dog. They need to settle down into one area, this makes it easier to be able to secure them using a Humane Trap that gets monitored by a trail camera or two. Flyers are critical for you to get your sightings.. YOU are the ground pounder. From the start I am on you to complete all your tasks and stay in touch with progress so I can make further suggestions for the next step or steps.

There is no need to comment here, I know what I do, what I have done, and what I will continue to do to eliminate the need for this person. Just a matter of time, til that income will deplete. Remember: Trolls and Minions exist, they monitor my page (as well as other Lost Pet pages) and reach out to those people I have already initiated contact with. Guess business must be slow to have to troll a Volunteers page.

Takeaways/Warnings:

People who own dogs. Please take care of them. They are your responsibility. Imagine having to live with the fact that they had to die, get tortured or

















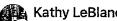
Regardless of what the news may say, or the credit he may lay claim to, Jamie Genereux had 0 to do with finding Gigi, just saying...! told Alicia when she called me on Friday that he wouldn't, and he didnt. I also told her that she was probably going to pop out somewhere this weekend now that the heat wave is over, that she was laying low because of the heat, and she did exactly that. He is going to say that "the owners scent" helped her get home, which is laughable, because dogs make their way home all on their own for the love of God. I am glad that she is home, and I am glad Alicia is out only a few hundred bucks instead of thousands. He is a predator, and needs to stop taking advantage of people.

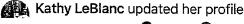
0\$ 6

10 Comments

Like

⇔ Share















Alicia's Post

Celeste Moran

<

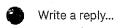
I guess Kathy and the owner that posted earlier were correct about the tracker. You don't need one she was walking down the street on her own from what I have read on previous posts that's how she was found. Unfortunately this happens a lot a tracker will tell you they have found your dogs scent and then will set up equipment and owners are then roped in. Costing hundreds sometimes thousands of dollars. Always buyer beware!

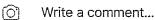
2d Like Reply

Steven Copeland

WRONG!!! He found our beautiful GiGi and if anyone has something to say about Jamie/Sharon Llive at 13 Birch Bottom Cir Rockland MA. Come talk to me face to face. I will not be responding to any cowards posting a rebuttal here

1d Like Reply





















()3

©3



Here is what Jamie Genereux from Packleader Petrackers is pissed about and decided to troll my post yesterday. The post in question (that was put on public so it could be shared if any of you wanted to share) was asking for help as some volunteers at MDM were looking for someone to let us borrow some fencing to help us with a dog. Yes, we are volunteers and don't get paid for what we do, he does, and charges hundreds and thousands of dollars (depending on how much the owner has) to bring his dogs to track the target dog. So this is one of our philosophical differences.

His shtick is that everybody should be able to spend this money to find their dog (which again, comes with no guarantees), ones finances should not have anything to do with it. He does not say this to people who reach out to him, but that is how he feels. He thinks MDM, Granite State Dog Recovery, Budda Dog Recovery, and generally any other dog rescue organization sucks and are run by a bunch of hacks. Go ahead Jamie, challenge me on this one too buddy.

So anyway, the first picture is of him holding "Zoey" (notice he does not even use her name). Keep this picture and the narrative he writes on the post in mind when reading the next part....

As it turns out, two 2 kids and their dog (ironic that the kids dog helped find her and Jamie's didn't. LOL) down the street from where she went missing actually found her, HE DID NOT, yet gave the kids 0 credit or kudos, when they were really the hero's of this story, not him or Jodi Greenleaf, the only people mentioned in the narrative. I guess they were the "everyone else".

The next 2 pictures are screenshots of Tom Salviati (the kids dad) and Erin Langlois-Noble (related to the owner of the dog). Erin acknowledges and thanks Tom, and Tom's kids get the reward.

So yes, I do have a problem with these kids not getting the credit that they deserve, either by Jamie, Jodie, and sadly enough, the owner of Zoey that only praises Jamie and Jodi, and gives very little mention of the kids.

So go back to the picture...Doesn't show the same thing now, does it. It makes him look like HE is the hero and he "rescued" her...Please note, that she was already safe and secure in the house and should have been brought right in the car safely....but NOOOO, evidently he had to walk her back, instead of being safe, getting her on a leash and into a car to be driven back to the home to decompress. Please also note that the finders also called the owner, so my guess is that the owner was there too, so why she needed to be walked back perplexes me.

Zoey, when she went missing, just had surgery and was on a mess of medicines. She didn't go far, she had always been hunkered down very close by (note that she was found a few houses down), because, unless chased out, chasing something, or generally known as a runner, they generally tend to stick close by. The owners were told that she was all over the place in the woods behind her house, but given the medical state she was in, and clearly very near by (though he says, the owners "scent" lead her back to the area...idiot...hahahahaha), why in the hell were those dogs NOT able to find her...in tracking terms...SHE WAS RIGHT THERE.

So yeah,wherever I saw this blatant lie being shared by both him and Jodi, pushing his services and claiming how wonderful Jamie is, in the various lost dog pages, I called them out on it at every opportunity, and he is butt-hurt, because I am right, and he knows it. That is why he troll my page and give me shit for asking for help with a dog (very professional by the way).

My purpose of this post is to expose him for his lack of transparency as

page and give me shit for asking for help with a dog (very professional by the way).

My purpose of this post is to expose him for his lack of transparency as to the number of dogs he and his dogs actually find, and generally, "how he works", and how he will walk away when the money dries up. People should not have to set up GoFundMe accounts to pay him, to only probably NOT being able find their dog, nor should they not be able to pay a utility bill or rent, or use their savings to pay him, to only probably NOT being able find their dog. I guess to him and us, find means very different things...

My hope one or two of you can share this in hopes that it will be reshared and so on, so this guy can be exposed.













Like · 23w

Jamie Genereux I love how you try to turn it around and make it look like I'm the one trolling your page after you tag me in a million posts yesterday. Pretend you're all ethical and just want to give the people proper credit.

Like · 23w

↑ Hide 31 Replies

Kathy LeBlanc Hey idiot, FB doesn't work that way, ! cannot tag you if I am not FB friends with you. Want to tell another lie?? You mean that we don't give "YOU" credit you mean...That is because you really dont find the dog...You find fur and make the owners beli... See More

Like · 23w · Edited



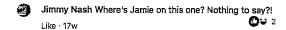
comments back to me! PLEASE!!!

Like · 23w



Kathy LeBlanc Yes Jamie, I deleted your comment, it was truly hateful, but I am not surprised you would stoop to that level. It has no point to the discussion here except to be just that, hateful. If you would like to defend your position with her, please do so. Stop deflecting when you know you are wrong....

Like · 23w · Edited



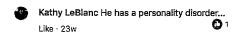


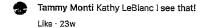
Like - 16w



Tammy Monti He sounds like a looser.

Like · 23w

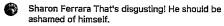






Dawn Marie He's a con artist who rips off people when they're vulnerable. He charges 5-600.00 and maybe more to "search" for a lost dog. It's sickening!

Like · 23w



Like · 23w

Tammy Monti CREEP!!!!

Like 22w



Sheilah Graham Trolls Trolls and more trolls... They need better hobbies... Not worth your time and energy Kathy ${\bf g}^{n}$?



Like - 17w

Kathy LeBlanc Bye bye Mike, are you going to create another troll post Jamie? 美美美

Like · 16w · Edited





Brandon Noble

Amazing. Thank you Jodi and Jamie! Thank you to all the volunteers and to the children that called us.

00= 34

Like

Comment Comment

Brandon Noble updated his profile picture. ••• March 8 • 😚



Brandon's Post



Rhonda Dutton

Thank heavens you found her...where was she?

22w



Brandon Noble

She was hiding under a fence a few houses down, but she must have followed our scent back from the powerlines and the trackers dogs were going nuts today and wouldn't leave the area. That's why, she went to the pond to drink and then seek shelter. Shes skinny and we'lll be going to the very but nuts how she survived and actually looks okay!

22w



Rhonda Dutton
Such wonderful news!!!!

22w



Melyssa Braman Yay!!

22w

Frank Thompson
Great News So Happy For You Guys
!!!



26









01

Missing Dog!

I am confused. I thought Jamie Genereux found Zoey. Linda George Faber?

Melyssa Braman

By the way, I've never really thought about using dog trackers to track a lost dog, but that's brilliant and effective :-)

22w

Attleboro MA **2**



Brandon Noble

It was very effective - I was skeptical at first but he knew what he was doing and because of him Zoey found our scent and was able to follow us back home.

22w





<

Catherine White

Yay!!!!





Julie Sigman Boudreau I'm so happy she's found and safe. Hopefully she checks out at the vet with flying colors!

22w





Lee Brown

OMG THIS IS THE BEST...SOOOOO HAPPY!!!

22w















Boxer

"Zoey"

Female

10 months/40 lbs

Brown w/ Black Mask Shaved in several spots **Wearing Collar**

3-5-18

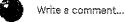
• Chat (16



Erin Langlois-Nobie Just an FYI to all, I am the owner of this Boxer and if it wasn't for Jamie Genereux and all his hard work Zoey wouldn't be home. I believe everything he did with my husband and his dogs brought Zoey back to our neighborhood where she was found. Zoey was on a lot of medications and sick, she was pretty disoriented. She found her way back here because of Jaimie and was thankfully found. There are 3 people who know the entire story, myself, my husband and Jaimie. If others want to fabricate there version of the story then so be it, but they don't have a clue about any of it.

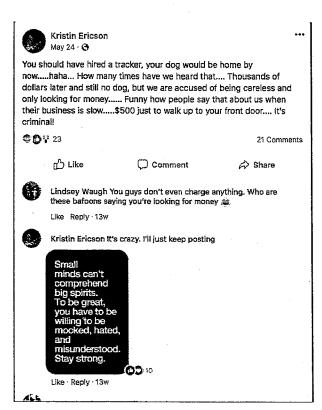
Like · Reply · 22w











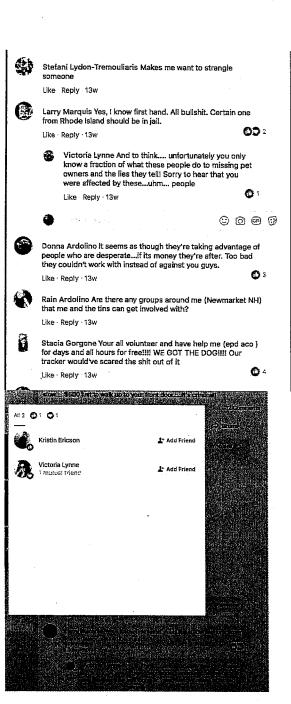


EXHIBIT B





RANT: Long over due - read it and deal with it, you don't want to read it, simply scroll by.. I could care less either way.. This simply has to be addressed. No better time than the present.

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Sheilah Graham



Volunteering their time, while this other person charges approximately \$100 an hour for a stroll with their pup, if they even utilize them at all.. Which currently will also run you a 3 days rate of \$100 a day MINIMUM. Oh, and if they leave equipment, they will charge you for that too. That is one of the many difference between Volunteering ones time and efforts to assist a devastated family, instead of causing them to spend their hard earned money on something they are quite capable of doing on their own.. However, this person misleads them in to thinking that this infact is not possible. How wrong this is. This is how desperate they are. They are gullible to what this asshat says. I am a huge fan of KARMA, she is relentless, and this person will get theirs in due time. Sadly not soon enough.

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Verizon 🖘

Sheilah Graham



no results.. This saves time, since I won't have to piece everything together again and is critical for your pups safety. I, unlike others, do not interfere when someone else is already working with a family.

Any dog that is lost and moving around, sees anything as a Predator. They will not allow their own humans to approach them, let alone a stranger and their dog. They need to settle down into one area, this makes it easier to be able to secure them using a Humane Trap that gets monitored by a trail camera or two. Flyers are critical for you to get your sightings.. YOU are the ground pounder. From the start I am on you to complete all your tasks and stay in touch with progress so I can make further suggestions for the next step or steps.

There is no need to comment here, I know what I do, what I have done, and what I will continue to do to eliminate the need for this person. Just a matter of time, til that income will deplete. Remember: Trolls and Minions exist, they monitor my page (as well as other Lost Pet pages) and reach out to those people I have already initiated contact with. Guess business must be slow to have to troll a Volunteers page.

Takeaways/Warnings:

People who own dogs. Please take care of them. They are your responsibility. Imagine having to live with the fact that they had to die, get tortured or











EXHIBIT C

<



Kathy LeBlanc

Sunday at 1:13 PM · 🚱

Regardless of what the news may say, or the credit he may lay claim to, Jamie Genereux had 0 to do with finding Gigi, just saying...! told Alicia when she called me on Friday that he wouldn't, and he didnt. I also told her that she was probably going to pop out somewhere this weekend now that the heat wave is over, that she was laying low because of the heat, and she did exactly that. He is going to say that "the owners scent" helped her get home, which is laughable, because dogs make their way home all on their own for the love of God. I am glad that she is home. and I am glad Alicia is out only a few hundred bucks instead of thousands. He is a predator, and needs to stop taking advantage of people.

0 6

10 Comments

心 Like

Share



Kathy LeBlanc updated her profile











Celeste Moran

I guess Kathy and the owner that posted earlier were correct about the tracker. You don't need one she was walking down the street on her own from what I have read on previous posts that's how she was found.Unfortunately this happens a lot a tracker will tell you they have found your dogs scent and then will set up equipment and owners are then roped in. Costing hundreds sometimes thousands of dollars. Always buyer beware!

2d Like Reply

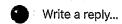
Steven Copeland

WRONG!!! He found our beautiful GiGi and if anyone has something to say about Jamie/Sharon I live at 13 Birch Bottom Cir Rockland MA. Come talk to me face to face. I will not be responding to any cowards posting a rebuttal here

1d Like Reply

₫3

⊕3



Write a comment...



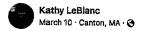












Here is what Jamie Genereux from Packleader Petrackers is pissed about and decided to troll my post yesterday. The post in question (that was put on public so it could be shared if any of you wanted to share) was asking for help as some volunteers at MDM were looking for someone to let us borrow some fencing to help us with a dog. Yes, we are volunteers and don't get paid for what we do, he does, and charges hundreds and thousands of dollars (depending on how much the owner has) to bring his dogs to track the target dog. So this is one of our philosophical differences.

His shtick is that everybody should be able to spend this money to find their dog (which again, comes with no guarantees), ones finances should not have anything to do with it. He does not say this to people who reach out to him, but that is how he feels. He thinks MDM, Granite State Dog Recovery, Budda Dog Recovery, and generally any other dog rescue organization sucks and are run by a bunch of hacks. Go ahead Jamie, challenge me on this one too buddy.

So anyway, the first picture is of him holding "Zoey" (notice he does not even use her name). Keep this picture and the narrative he writes on the post in mind when reading the next part....

As it turns out, two 2 kids and their dog (ironic that the kids dog helped find her and Jamie's didn't. LOL) down the street from where she went missing actually found her, HE DID NOT, yet gave the kids 0 credit or kudos, when they were really the hero's of this story, not him or Jodi Greenleaf, the only people mentioned in the narrative. I guess they were the "everyone else".

The next 2 pictures are screenshots of Tom Salviati (the kids dad) and Erin Langlois-Noble (related to the owner of the dog). Erin acknowledges and thanks Tom, and Tom's kids get the reward.

So yes, I do have a problem with these kids not getting the credit that they deserve, either by Jamie, Jodie, and sadly enough, the owner of Zoey that only praises Jamie and Jodi, and gives very little mention of the kids.

So go back to the picture...Doesn't show the same thing now, does it. It makes him look like HE is the hero and he "rescued" her...Please note, that she was already safe and secure in the house and should have been brought right in the car safely....but NOOOO, evidently he had to walk her back, instead of being safe, getting her on a leash and into a car to be driven back to the home to decompress. Please also note that the finders also called the owner, so my guess is that the owner was there too, so why she needed to be walked back perplexes me.

Zoey, when she went missing, just had surgery and was on a mess of medicines. She didn't go far, she had always been hunkered down very close by (note that she was found a few houses down), because, unless chased out, chasing something, or generally known as a runner, they generally tend to stick close by. The owners were told that she was all over the place in the woods behind her house, but given the medical state she was in, and clearly very near by (though he says, the owners "scent" lead her back to the area...idiot...hahahahaha), why in the hell were those dogs NOT able to find her...in tracking terms...SHE WAS RIGHT THERE.

So yeah,wherever I saw this blatant lie being shared by both him and Jodi, pushing his services and claiming how wonderful Jamie is, in the various lost dog pages, I called them out on it at every opportunity, and he is butt-hurt, because I am right, and he knows it. That is why he troll my page and give me shit for asking for help with a dog (very professional by the way).

My purpose of this post is to expose him for his lack of transparency as

page and give me shit for asking for help with a dog (very professional by the way).

My purpose of this post is to expose him for his lack of transparency as to the number of dogs he and his dogs actually find, and generally, "how he works", and how he will walk away when the money dries up. People should not have to set up GoFundMe accounts to pay him, to only probably NOT being able find their dog, nor should they not be able to pay a utility bill or rent, or use their savings to pay him, to only probably NOT being able find their dog. I guess to him and us, find means very different things...

My hope one or two of you can share this in hopes that it will be reshared and so on, so this guy can be exposed.

MUME ABOUT PHOTOS VIDEOS EVENTS

Packleader Pettrackers shared

Jamie Genereux's post. Mar 8 at 11:52am · 🚱

The boxer in Attleboro was found today. Big thanks to Jodi Greenleaf and everyone else who helped out on this one. You guys did amazing with the shares and posters and the owner is very grateful to have her back!

Jamie Genereux



Amounts debutes you quest for the first form of the first form of

Ab) kids were variding out of leb, in the backyard (here an a couple of the pickets on the fence that were out due to the storm. They want to put them beck and they found Zogy under the Arbor Vitae voice and fence. Thank God it was a dry space. They brough the rin the house driver off kept her warm fed here more food and watur. To some food and watur. To see the second dog they found in the week

008

60 Comments: 11 Shares

⇔ Share

[ြ Like

Lisa Marie He's a pos

Like · 23w

Nancy Whelpley Bersani Just Wow

Like · 23w

Jamie Genereux I love how you try to turn it around and make it look like i'm the one trolling your page after you tag me in a million posts yesterday. Pretend you're all ethical and just want to give the people proper credit.

Like · 23w

↑ Hide 31 Replies

Kathy LeBlanc Hey idiot, FB doesn't work that way, I cannot tag you if I am not FB friends with you. Want to tell another lie?? You mean that we don't give "YOU" credit you mean....That is because you really dont find the dog...You find fur and make the owners beli... See More

Like · 23w · Edited ·



comments back to me! PLEASE!!!

Like · 23w

6 CO

Kathy LeBlanc Yes Jamie, i deleted your comment, it was truly hateful, but I am not surprised you would stoop to that level. It has no point to the discussion here except to be just that, hateful. If you would like to defend your position with her, please do so. Stop deflecting when you know you are wrong....

Like · 23w · Edited

Jimmy Nash Where's Jamie on this one? Nothing to say?!

Sheilah Graham CRICKETS!!! Nothing new there... He is a better dancer than Fred Astaire, dances right around a question and re-directs an attack on whoever has him trapped in his own comments... It is typical...

like - 16u

Tammy Monti He sounds like a looser.

Like · 23w

Kathy LeBlanc He has a personality disorder...

Like · 23w

Tammy Monti Kathy LeBlanc I see that!
Like · 23w

Dawn Marie He's a con artist who rips off people when they're vulnerable. He charges 5-600.00 and maybe more to "search" for a lost dog. It's sickening!

Like · 23w

Sharon Ferrara That's disgusting! He should be ashamed of himself.

Like · 23w

Tammy Monti CREEP!!!!

Like · 22w

Sheilah Graham Trolls Trolls and more trolls... They need better hobbies... Not worth your time and energy Kathy \mathbf{g}^{Λ}



Like · 17w

Kathy LeBlanc Bye bye Mike, are you going to create another troll post Jamie?

Like · 16w · Edited

⊕: 3

O 2



Thank heavens you found her...where was she?

22w

Brandon Noble

She was hiding under a fence a few houses down, but she must have followed our scent back from the powerlines and the trackers dogs were going nuts today and wouldn't leave the area. That's why, she went to the pond to drink and then seek shelter. Shes skinny and we'lli be going to the very but nuts how she survived and actually looks okay!

22w

Rhonda Dutton
Such wonderful news!!!!
22w

Melyssa Braman Yay!! 22w

Frank Thompson
Great News So Happy For You Guys
!!!











Melyssa Braman

By the way, I've never really thought about using dog trackers to track a lost dog, but that's brilliant and effective:-)

22w

O2



Brandon Noble

It was very effective - I was skeptical at first but he knew what he was doing and because of him Zoey found our scent and was able to follow us back home.

22w





Catherine White Yay!!!!

22w

1



Julie Sigman Boudreau

I'm so happy she's found and safe. Hopefully she checks out at the vet with flying colors!

22w





Lee Brown

OMG THIS IS THE BEST...SOOOOOO HAPPY!!!

22w

Office



8









Teri Woodrow Hennigan shared a post. March 9 - 👪

I am confused. I thought Jamie Genereux found Zoey. Linda George Faber?

Missing Dog! Attleboro MA



Boxer

"Zoey"

Female

10 months/40 lbs

Brown w/ Black Mask Shaved in several spots Wearing Collar

3-5-18

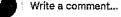
• Chat (16



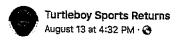
Erin Langlois-Noble Just an FYI to all, I am the owner of this Boxer and if it wasn't for Jamie Genereux and all his hard work Zoey wouldn't be home. I believe everything he did with my husband and his dogs brought Zoey back to our neighborhood where she was found. Zoey was on a lot of medications and sick, she was pretty disoriented. She found her way back here because of Jaimie and was thankfully found. There are 3 people who know the entire story, myself, my husband and Jaimie. If others want to fabricate there version of the story then so be it, but they don't have a clue about any of it.

Like · Reply · 22w

60







Part 3 of Exposing Off Leash K9 Training LLC: Baloo's story and more:



TURTLEBOYSPORTS.COM

Exposing Off Leash K9 Training LLC Part Three: Former Employees Come Forward, Becca The Beast Fired, And ... Story



29 Comments 17 Shares

Like

Comment Comment

A Share





Karen Homer Monteiro When is the article about the scam artist Jamie from Pack Leaders pet tracking coming out? He's such a scam that preys on people desperately looking for their lost pets . He said another persons pet was dead and it walked into a store shortly after . Blows my mind he said Knox drowned in this pond when Knox was never even there to begin with

Like · Reply · 5h

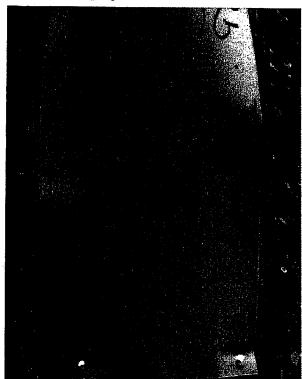
Helping Lost/Found Pets On Cape Cod...





Jackie-Matt Loomis ➤ Helping Lost/Found Pets On Cape Cod Get Back Home August 1 at 6:31 PM · (♣

These are all over East Sandwich I hope he is found! Keep your eyes open!





Open

Helping Lost/Found Pets On Cape Cod...



🔐 Verizon 🤝

Denise Lauren

This person should contact Jamie he will find the dog good or bad. This is his info

17 hrs Like More



Denise Lauren



Jamie Genereux



17 hrs Like More



Karen Homer Monteiro

I would not ever recommend Jamie and Pet Trackers

17 hrs Like More



Karen Homer Monteiro

He's also being investigated in the Knox case (Jarod Mayo's bulldog that was found dead)

17 hrs `Like More



Denise Lauren

Ok so sorry I do know he found lioness last



Open

← Helping Lost/Found Pets On Cape Cod...



17 hrs Like More



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He's also being investigated in the Knox case (Jarod Mayo's bulidog that was found dead)

17 hrs Like More



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Ok so sorry I do know he found lioness last year

17 hrs Like More



Karen Homer Monteiro

Denise Lauren he also lied to Steve many times

16 hrs Like More



Karen Homer Monteiro

Denise Lauren not DCX , Lioness's Owner Steve , sorry for confusion

15 hrs Like More



Judith Wilson

Denise Lauren he did not find lioness there were calls of sightings he set Cathy's own trap at the sighting area and caught him in the trap!!

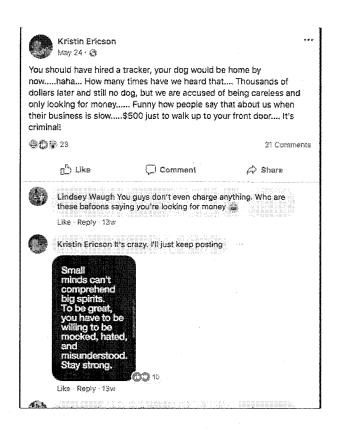
It had nothing to do with tracking at all. FYI

12 hrs Like More



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EXHIBIT D



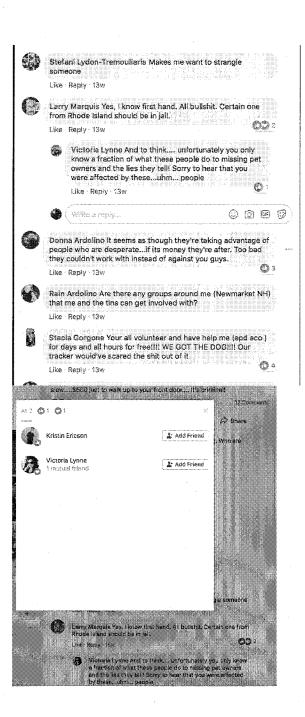


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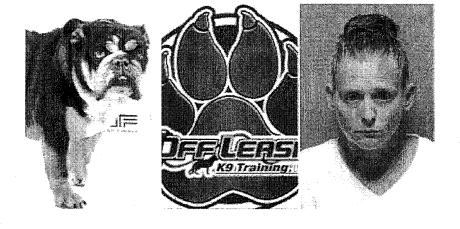
TURTLEBOY INVESTIGATES

Manchester Turtlette / August 9, 2018 /

SHOP THE TURTLEBOY STORE







LISTEN TO
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LATE NIGHT
GARAGE
PODCAST ON
ITUNES AND
SOUNDCLOUD









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22 Votes

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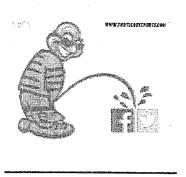


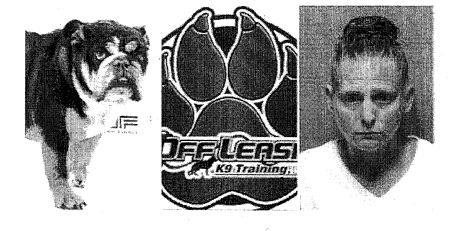
TURTLEBOY INVESTIGATES

Manchester Turtlette / August 8, 2018 /

SHOP THE TURTLEBOY STORE

Off Leash K9 Training And Associates Expose To Come Come In A Several Part Series Detailing Allegations Of Abuse, Missing Dogs And Deaths





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21 Votes

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2 of 24

EXHIBIT F

Q

PODCASTS

3 Jurtleboy

be the case. I nat makes you worked why it she hadn't ALL CATEGORIES SHOP done anything wrong, why would she not tell anyone sooner? Did she have something to hide? Was she ultimately responsible for his death? Should she be charged with animal cruelty in addition to her 4 counts of obstruction of justice? We'll never be able say for certain, although in this series you will come to find that the answer to these may very well just be a resounding "Yes". We all know that Amelia has a record including things such as possession of drugs, larceny and embezzlement. A lot of people feel that record should include Animal cruelty, as well.

This investigation into Off Leash K9 Training,LLC is not going to be pretty. In fact, it's going to be down right disturbing. You're going to be shown how dogs are mistreated, lost or possibly stolen and how they die. You'll learn how they hire animal abusers with criminal records, some showing past arrests for animal cruelty. We will be showing you how their training methods are deplorable and how a terrified dog isn't a trained dog. The investigation into Packleader PetTrackers is going to be enraging, as you'll come to find that this guy likes to take credit for other people's finds and will readily charge an insane amount of money to produce nothing. You'll be amazed at home many animals "must have drowned" just like Knox, except oftentimes those people don't have the money to hire divers or have their dogs show up weeks later or be found by real dog trackers. We'll also show you what to look for when hiring real dog trainers and trackers, the do's and don't. This will hopefully ensure that your pet is kept safe from these animals, and if they go missing will actually be found. Ultimately, this series will be for the inction of those dags and their families. Stay tuned for part

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EXHIBIT G



TURTLEBOYSPORTS.COM

Exposing Off Leash K9 Training LLC Part Three: Former Employees Come Forward, Becca The Beast Fired, And ... Story

○ 🚉 47

29 Comments 17 Shares

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Like · Reply · 5h

← Helping Lost/Found Pets On Cape Cod...

ſĥ

17 hrs Like More



He's also being investigated in the Knox case (Jarod Mayo's bulldog that was found dead)

17 hrs Like More

Denise Lauren

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17 hrs Like More

Karen Homer Monteiro
Denise Lauren he also lied to Steve many times

16 hrs Like More

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Denise Lauren not DCX , Lioness's Owner
Steve , sorry for confusion

15 hrs Like More

Judith Wilson

Denise Lauren he did not find lioness there were calls of sightings he set Cathy's own trap at the sighting area and caught him in the trap!!

It had nothing to do with tracking at all. FYI

12 hrs Like More



Open

EXHIBIT H





RANT: Long over due - read it and deal with it, you don't want to read it, simply scroll by.. I could care less either way.. This simply has to be addressed. No better time than the present.

So fairly recently I have been asked to assist with lost dogs pretty much locally, however, I am able to quide those across country as well (atleast there is no resistance/hesitation with those owners, and they do EVERYTHING they need to do). People reach out to me to assist, friends suggest owners reach out to me to assist etc. Some simply find me on Facebook or through Google. I Volunteer (that is right, I don't get paid one penny to assist you) my time to assist each and every one of them as best I can. You receive special flyers since the ones you most of the time are useless and cluttered (not intentional, since you are doing the best you can), with special tasks to be undertaken to bring your lost dog home. A map is set up to monitor and track your dogs progress and travel patterns. Some of you go above and beyond and get your pup home sooner, others drag their feet, and it takes a bit longer, some of you don't do anything, so why should !?!? Then the last group of people decide after we have started working through the process with them, that they simply want to invest and "Hire" a different option for their search process. In all honesty, as I have stated before, I don't care how your

















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Volunteering their time, while this other person charges approximately \$100 an hour for a stroll with their pup, if they even utilize them at all.. Which currently will also run you a 3 days rate of \$100 a day MINIMUM. Oh, and if they leave equipment, they will charge you for that too. That is one of the many difference between Volunteering ones time and efforts to assist a devastated family, instead of causing them to spend their hard earned money on something they are quite capable of doing on their own.. However, this person misleads them in to thinking that this infact is not possible. How wrong this is. This is how desperate they are. They are gullible to what this asshat says. I am a huge fan of KARMA, she is relentless, and this person will get theirs in due time. Sadly not soon enough.

As an owner you need to do what you feel is right... I tell you this right up front, I can only offer you suggestions, what you do with it is up to you. No regrets... However, be open and honest with me. You want to utilize a different option, have the integrity and decency to tell me up front before you take all the info I have to offer you. Let your paying person provide you with their information or tips to guide you. Only thing I ask, keep me up to date with your progress and sightings. I have no desire to interfere with your process, I simply wan tot be up to speed incase your paid party deserts you in the middle with no results.. This saves time, since I won't have to piece everything together again and is critical for your













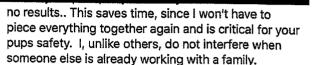
💶 Verizon 🕏

10:29 PM

100% ⊏



Sheilah Graham



Any dog that is lost and moving around, sees anything as a Predator. They will not allow their own humans to approach them, let alone a stranger and their dog. They need to settle down into one area, this makes it easier to be able to secure them using a Humane Trap that gets monitored by a trail camera or two. Flyers are critical for you to get your sightings.. YOU are the ground pounder. From the start I am on you to complete all your tasks and stay in touch with progress so I can make further suggestions for the next step or steps.

There is no need to comment here, I know what I do, what I have done, and what I will continue to do to eliminate the need for this person. Just a matter of time, til that income will deplete. Remember: Trolls and Minions exist, they monitor my page (as well as other Lost Pet pages) and reach out to those people I have already initiated contact with. Guess business must be slow to have to troll a Volunteers page.

Takeaways/Warnings:

People who own dogs. Please take care of them. They are your responsibility. Imagine having to live with the fact that they had to die, get tortured or













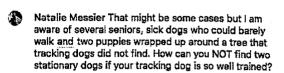
EXHIBIT I



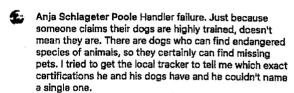
Kristin Ericson shared a photo. July 30, 2017 - 🔾

This is my own personal page, so I can comment as I see fit......over \$6000 was PAID to a tracker, a tracker that said don't hang flyers, a tracker that said if people are in the area then my dog won't be able to sniff the scent, a tracker who's dogs could NOT even sniff out a deceased dog who was still on the property on another case. When sightings came in, it was said that's impossible, the dog can't be there.....but you know what, the dog was! The owners finally smartened up to this scam and contacted MDM and MDM got the job done. While we are not the be all or end all, we don't take advantage of owners, and never charge a dime! Sickens me to think in their weakest moments owners can fall for this. Yes, there are reputable paid services out there who are NOT trackers, but do your homework first!





Like - Reply - 1y



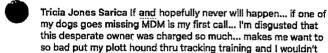
Like · Reply · 1y

Write a reply...



Candy LaFountain I can attest to flyers do work well post it notes plus dedicated volu teers like yourselves. Still cant thank you enough.

Like - Reply - 1y



charge a penny... just feed me coffee

Like - Reply - 1y



Stefani Lydon-Tremouliaris A news station needs to be made aware of this scammer!!!!

Like - Reply - 1y

O 2



12:31 AM

₹ 7% [____



Stefani Lydon-Tremouliaris
Sunday at 10:35 AM · 😚

Did you know that....

Missing Dogs Massachusetts assisted in over 1,000 lost dog recoveries and tracking the same number for 2018?

Did you know that... they are 100% volunteer based and don't charge dog owners A SINGLE PENNY for the hundreds of man hours the volunteers put in? Did you know that... they use state of the art equipment and cameras to catch missing dogs? Did you know that... there are companies (I like to compare them to ambulance chasing lawyers) who charge people thousands to do something similar with WAY less success, because they have no volunteers and a fraction of the equipment.... I'm talking thousands of dollars desperate dog owners are charged by these people... its sick and makes my blood boil!!!

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Comment



OO 18



Kim O'connor Agree Can you make this sharable.. want my friends too see this also

2d Like Reply

(O) Write a comment...





8







Stefani's Post

Kim O'connor

Agree Can you make this sharable.. want my friends too see this also

2d Like Reply

Stefani Lydon-Tremouliaris
Done

2d Like Reply

Kim O'connor They found her

2d Like Reply

Stefani Lydon-Tremouliaris
Kim O'connor this is not about 1
Dog... because even a blind squirrel
can find a nut once in a while. The
dog could have been found without
spending over \$1000, they got
scammed.

2d Like Reply

Kim O'connor
Stefani Lydon-Tremouliaris didn't
say anything about the tracker..!
just simply saw she was found a
few minutes ago and shared that
info ,.

(O) Write a comment...















<

Stefani Lydon-Tremouliaris I'm so glad the dog was found but if he gets credit more people will end up scammed.

2d Like Reply

Lori O'Neil

I had a feeling that was how that dog was found by comments on the post. Very sad when people think if they spend lots of money that's the only way they will find the dog. I can bring my dog Jackson to find as well and I still know the volunteers would still find the dog on their own.

2d Like Reply

Stefani Lydon-Tremouliaris Lori O'Neil hey you could start a dog tracking business and get rich!!! Desperate people will drain their savings to find their dog!! Tucker helped me get a dog once too... I'm gonna be rich!!!

> Like Reply 2d

Kim O'connor

(O) Write a comment... GIF) 🔾

ထို

•

冊



10:02 PM

WBZ I CBS Boston's Post

WBZ | CBS Boston Sunday at 3:53 PM · 😵

NEX I year, the dog will be secure instead of loose.

2d Like Reply

O5

all the kepty

Michael Talbot Replied - 3 Replies

Paula Laberge
So, did the pet detective find her?

2d Like Reply

01

Kathy LeBlanc Nope, had nothing to do with it.

2d Like Reply

Q1

Write a reply...

Louise Henderson
So happy she is back home! My
dog, a shitzu, was so afraid of
fireworks, and Halloween 🙊!

Write a comment...









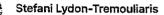


Stefani Lydon-Tremouliaris

Diane Santee there are others who do it for free because they are not trying to make money on the desperation of people who have lost their pet. And with the amount of money he charges you would think his track record would be a lot better. He has charges people literally thousands of dollars and still not found their dog. He's a scam artist. I'm glad you found your dog but even a blind squirrel finds a nut once in a while.

2d Like Reply

Write a reply...



This dog was found... walking back to her house on her own street. I'm sure he will try to take credit. Smh

2d Like Reply

Heather Eileen

Hoping to see a happy reunion story

soon!!🎔🚱

3d Like Renly

O 2

(a) Write a comment...















EXHIBIT J



10:18 +

Missing Dogs Massachusetts



Lori O'Neil

Wait, so the tracker actually lied then just saying the dog was found? Then the trainer fully admitted he was never there in Wrentham?

9w



Missing Dogs Massachusetts Yes - that is our understanding via the family's statement

9w



Lori O'Neil Missing Dogs Massachusetts unbelievable...

Sw.



Victoria Lynne

Yup! Found pieces of him and everything. Told him he was at the bottom of the lake and family had Dive Team come out... nothing. Then trainer spoke up and refuses to talk anymore.

9w





Sammy Conroy All I can say is "Wow"

9w















~* Please focus on sharing to help find Knox. Negative comments are not productive and will not aid law enforcement in solving this case. Instead of commenting, please share! *~ 7-12-18

An Update from Jerod & Chantal Mayo concerning the disappearance of their English Bulldog, "Knox", while under the care of Off Leash K9 Training-Providence (physical location – Cranston, RI)

These are the known facts in the case as of today:

Due to housebreaking issues following the arrival of a new baby, the family sought the advice of a trainer for know

Based on reviews/testimonials and described qualifications, Off Leash k9 Training –Providence' two week board/train program was selected. Off Leash Training Providence is a franchised partner of Off Leash K9 Training, Woodbridge, VA. Payment was made and accepted, and Knox was placed in the care of said trainer in the middle of April.

At the conclusion of the training period, Knox was returned home, without the pre-paid equipment or training outline that had been promised so that the Mayo family could continue and reinforce Knox' training. After multiple requests directed to the trainer regarding the above items went unanswered, she finally responded and excused her tardiness with the excuse of a family emergency.

Since Knox's training at home had now lagged, and





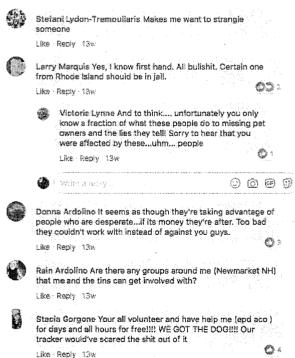


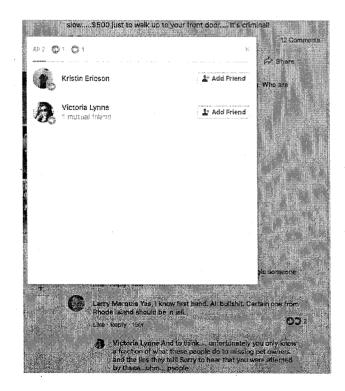












3:01 PM

√ x 85% 🗯



7-12-18 HELP US FIND KNOX!

An Update from Jerod & Chantal Mayo concerning the disappearance of their English Bulldog, "Knox", while under the care of **Off Leash K9 Training-PROVIDENCE (physical location – Cranston, RI)

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🗇 💎 Write a comment...















Victoria's Post

In addition, the family was told that a local scent tracking dog, paid for by Off Leash Corporate, had pulled remains of Knox from the pond at Joe's Rock, and that based on the tracking dogs reliability, his body remained at the bottom of the pond. The family was told that they would be given no further information as they weren't the party that paid for the tracking services.

The Mayo family, desperate to get their beloved dog/ family member back, and to obtain closure, hired a dive team to search the pond. The dive team reported that there was no deceased dog, or any animal found in the pond.

Fast forward a few days, some extensive police work, & research and footwork by many; became known that this trainer was due in court today (7-12-18) for running an unlicensed kennel and was seen on surveillance video at her home in Cranston around the time that Knox was described as "missing" from Wrentham.

The police again questioned the trainer, and she then formally admitted that she made the whole story up! Knox was NEVER AT JOE'S ROCK in Wrentham.

She gave an official statement at the Cranston Police station on Monday 7-9-18. In her statement, she claims that Knox was last seen at her residence in

(i) Write a comment...















EXHIBIT K

Kristin Ericson shared a photo. July 30, 2017 · 🚱

This is my own personal page, so I can comment as I see fit......over \$6000 was PAID to a tracker, a tracker that said don't hang flyers, a tracker that said if people are in the area then my dog won't be able to sniff the scent, a tracker who's dogs could NOT even sniff out a deceased dog who was still on the property on another case. When sightings came in, it was said that's impossible, the dog can't be there......but you know what, the dog was! The owners finally smartened up to this scam and contacted MDM and MDM got the job done. While we are not the be all or end all, we don't take advantage of owners, and never charge a dime! Sickens me to think in their weakest moments owners can fall for this. Yes, there are reputable paid services out there who are NOT trackers, but do your homework first!



Stacia Gorgone What 6000??????

You mean the sane trackers that go against animal Control officers and screw up what we do too???????? Not shocked

Like · Reply · 1y · Edited

Kristin Ericson Yes, you read that right. Often its just \$500 for them to show up, and possibly never even take the dogs out of the car. Yes those trackers too Stacia.

Like · Reply · 1y

Stacia Gorgone <u>Kristin Ericson</u> they are all Scum!!! I remember them

Doing that to people I know yet MDM is how the dogs were found!!!!

Like · Reply · 1v

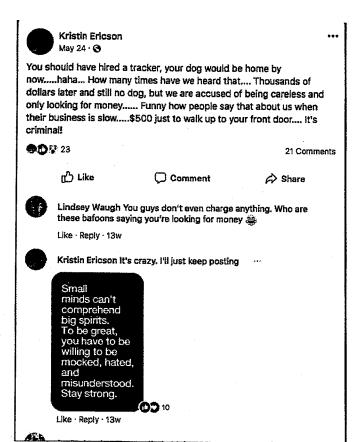
Stacia Gorgone! hope he's going to do something about it....... how dare they say no flyers!!!!! If I was that cities ACO he'll to pay!!!! They must be furious!!!! I don't allow anyone to get involved in my missing dogs unless they are approved by me...... sick of solicitations to owners it's awful! Too much drama they don't need!!!

Like · Reply · 1y · Edited

Karen Bauer Hovsepian Stacia Gorgone Thankfully you are not the only ACO that feels that way - I have a few in the towns around me that also will discourage or not allow a tracker into their towns but work hand in hand with me and MDM. Wish more ACO's would do the same.

Like Reply 1y

D 2



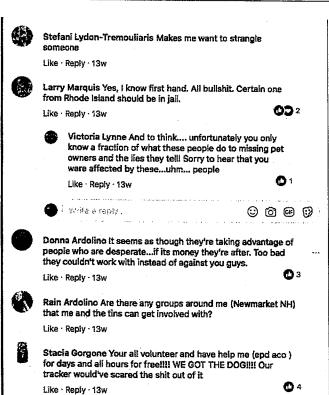




EXHIBIT L

Donna Hurley

Saturday, September 22, 2018 11:16 PM



Part 2 gets way more in depth and into the nitty gritty of Off Leash K9 Training, LLC:



TURTLEBOYSPORTS.COM

Exposing Off Leash K9 Training, LLC Part Two: Becca The Beast And Blondie The Beauty, The Only Happy Ending Here

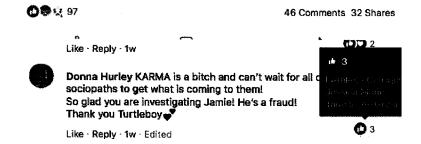


EXHIBIT M





Kathy LeBlanc

Sunday at 1:13 PM · 🔇

Regardless of what the news may say, or the credit he may lay claim to, Jamie Genereux had 0 to do with finding Gigi, just saying...! told Alicia when she called me on Friday that he wouldn't, and he didnt. I also told her that she was probably going to pop out somewhere this weekend now that the heat wave is over, that she was laying low because of the heat, and she did exactly that. He is going to say that "the owners scent" helped her get home, which is laughable, because dogs make their way home all on their own for the love of God. I am glad that she is home, and I am glad Alicia is out only a few hundred bucks instead of thousands. He is a predator, and needs to stop taking advantage of people.

0 6

10 Comments

心 Like

⇔ Share



Kathy LeBlanc updated her profile











Celeste Moran

<

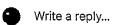
I guess Kathy and the owner that posted earlier were correct about the tracker. You don't need one she was walking down the street on her own from what I have read on previous posts that's how she was found. Unfortunately this happens a lot a tracker will tell you they have found your dogs scent and then will set up equipment and owners are then roped in. Costing hundreds sometimes thousands of dollars. Always buyer beware!

2d Like Reply

Steven Copeland

WRONG!!! He found our beautiful GiGi and if anyone has something to say about Jamie/Sharon I live at 13 Birch Bottom Cir Rockland MA. Come talk to me face to face. I will not be responding to any cowards posting a rebuttal here

1d Like Reply



(i) Write a comment...

8



①3

○3









Here is what Jamie Genereux from Packleader Petrackers is pissed about and decided to troll my post yesterday. The post in question (that was put on public so it could be shared if any of you wanted to share) was asking for help as some volunteers at MDM were looking for someone to let us borrow some fencing to help us with a dog. Yes, we are volunteers and don't get paid for what we do, he does, and charges hundreds and thousands of dollars (depending on how much the owner has) to bring his dogs to track the target dog. So this is one of our philosophical differences.

His shtick is that everybody should be able to spend this money to find their dog (which again, comes with no guarantees), ones finances should not have anything to do with it. He does not say this to people who reach out to him, but that is how he feels. He thinks MDM, Granite State Dog Recovery, Budda Dog Recovery, and generally any other dog rescue organization sucks and are run by a bunch of hacks. Go ahead Jamie, challenge me on this one too buddy.

So anyway, the first picture is of him holding "Zoey" (notice he does not even use her name). Keep this picture and the narrative he writes on the post in mind when reading the next part....

As it turns out, two 2 kids and their dog (ironic that the kids dog helped find her and Jamie's didn't. LOL) down the street from where she went missing actually found her, HE DID NOT, yet gave the kids 0 credit or kudos, when they were really the hero's of this story, not him or Jodi Greenleaf, the only people mentioned in the narrative. I guess they were the "everyone else".

The next 2 pictures are screenshots of Tom Salviati (the kids dad) and Erin Langlois-Noble (related to the owner of the dog). Erin acknowledges and thanks Tom, and Tom's kids get the reward.

So yes, I do have a problem with these kids not getting the credit that they deserve, either by Jamie, Jodie, and sadly enough, the owner of Zoey that only praises Jamie and Jodi, and gives very little mention of the kids.

So go back to the picture...Doesn't show the same thing now, does it. It makes him look like HE is the hero and he "rescued" her...Please note, that she was already safe and secure in the house and should have been brought right in the car safely...but NOOOO, evidently he had to walk her back, instead of being safe, getting her on a leash and into a car to be driven back to the home to decompress. Please also note that the finders also called the owner, so my guess is that the owner was there too, so why she needed to be walked back perplexes me.

Zoey, when she went missing, just had surgery and was on a mess of medicines. She didn't go far, she had always been hunkered down very close by (note that she was found a few houses down), because, unless chased out, chasing something, or generally known as a runner, they generally tend to stick close by. The owners were told that she was all over the place in the woods behind her house, but given the medical state she was in, and clearly very near by (though he says, the owners "scent" lead her back to the area...idiot...hahahahaha), why in the heli were those dogs NOT able to find her...in tracking terms...SHE WAS RIGHT THERE.

So yeah,wherever I saw this blatant lie being shared by both him and Jodi, pushing his services and claiming how wonderful Jamie is, in the various lost dog pages, I called them out on it at every opportunity, and he is butt-hurt, because I am right, and he knows it. That is why he troll my page and give me shit for asking for help with a dog (very professional by the way).

My purpose of this post is to expose him for his lack of transparency as

page and give me shirtor asking for neip with a dog (very professional by the way).

My purpose of this post is to expose him for his lack of transparency as to the number of dogs he and his dogs actually find, and generally, "how he works", and how he will walk away when the money dries up. People should not have to set up GoFundMe accounts to pay him, to only probably NOT being able find their dog, nor should they not be able to pay a utility bill or rent, or use their savings to pay him, to only probably NOT being able find their dog. I guess to him and us, find means very different things...





Lisa Marie He's a pos

Like · 23w



Nancy Whelpley Bersani Just Wow

Like · 23w



Jamie Genereux I love how you try to turn it around and make it look like i'm the one trolling your page after you tag me in a million posts yesterday. Pretend you're all ethical and just want to give the people proper credit.

Like · 23w

↑ Hide 31 Replies



Kathy LeBlanc Hey idiot, FB doesn't work that way, I cannot tag you if I am not FB friends with you. Want to tell another lie?? You mean that we don't give "YOU" credit you mean....That is because you really dont find the dog...You find fur and make the owners beli... See More

Like · 23w · Edited



comments back to me! PLEASE!!!

Like · 23w



Kathy LeBlanc Yes Jamie, I deleted your comment, it was truly hateful, but I am not surprised you would stoop to that level. It has no point to the discussion here except to be just that, hateful. If you would like to defend your position with her, please do so. Stop deflecting when you know you are wrong....

Like · 23w · Edited

Jimmy Nash Where's Jamie on this one? Nothing to say?!

Like 17w

Sheilah Graham CRICKETS!!! Nothing new there... He is a better dancer than Fred Astaire, dances right around a question and re-directs an attack on whoever has him trapped in his own comments... It is typical...

Like · 16w

Tammy Monti He sounds like a looser.

Like · 23w

Kathy LeBlanc He has a personality disorder...
Like · 23w
0 1

Tammy Monti Kathy LeBlanc I see that!
Like · 23w

Dawn Marie He's a con artist who rips off people when they're vulnerable. He charges 5-600.00 and maybe more to "search" for a lost dog. It's sickening!

Like · 23w

Sharon Ferrara That's disgusting! He should be ashamed of himself.

Like · 23w

Tammy Monti CREEP!!!!

Like · 22w

Sheilah Graham Trolls Trolls and more trolls... They need better hobbies... Not worth your time and energy Kathy \mathbf{g}^{n}



Like · 17w

Kathy LeBlanc Bye bye Mike, are you going to create another troll post Jamie?

Like · 16w · Edited

⊕∵ 3



Brandon Noble
March 8 • 24

Like

Amazing, Thank you Jodl and Jamie! Thank you to all the volunteers and to the children that called us.

99 34

Comment Comment

1 Comment

Brandon Noble updated his profile picture. ...



Brandon's Post

Rhonda Dutton

Thank heavens you found her...where was she?

22w

Brandon Noble

She was hiding under a fence a few houses down, but she must have followed our scent back from the powerlines and the trackers dogs were going nuts today and wouldn't leave the area. That's why, she went to the pond to drink and then seek shelter. Shes skinny and we'lli be going to the very but nuts how she survived and actually looks okay!

22w

OO 1 13

Rhonda Dutton
Such wonderful news!!!!
22w

Melyssa Braman Yay!! 22w

Frank Thompson

Great News So Happy For You Guys

?? 68









I am confused. I thought Jamie Genereux found Zoey. Linda George Faber?

Melyssa Braman

By the way, I've never really thought about using dog trackers to track a lost dog, but that's brilliant and effective :-)

22w





Brandon Noble

It was very effective - I was skeptical at first but he knew what he was doing and because of him Zoey found our scent and was able to follow us back home.

22w





Catherine White Yay!!!!

22w





Julie Sigman Boudreau

I'm so happy she's found and safe. Hopefully she checks out at the vet with flying colors!

22w





Lee Brown

OMG THIS IS THE BEST...SOOOOO HAPPY!!!

22w



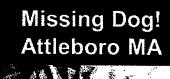














ANSSING DOGS

"Zoey"

Female

10 months/40 lbs

Brown w/ Black Mask Shaved in several spots **Wearing Collar**

3-5-18

• Chat (16



Erin Langlois-Noble Just an FYI to all, I am the owner of this Boxer and if it wasn't for Jamie Genereux and all his hard work Zoey wouldn't be home. I believe everything he did with my husband and his dogs brought Zoey back to our neighborhood where she was found. Zoey was on a lot of medications and sick, she was pretty disoriented. She found her way back here because of Jaimie and was thankfully found. There are 3 people who know the entire story, myself, my husband and Jaimie. If others want to fabricate there version of the story then so be it, but they don't have a clue about any of it.

Like - Reply - 22w



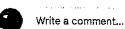






EXHIBIT N

Jan 22 at 4:18 PM Like • i 5 • Reply



Buddha Dog Rescue & R... Replied 1 Reply



Dawn Titus-Bankert

Apparently one of Jamie's cronies reported my post to facebook. Well here's another one. The so called dog tracker from RI.. Is a complete rip off and con artist. He will represent himself as a professional dog tracker when all he does is walk through the wood with his Dogs trying to look like GI Joe.. We hired him when our Pup was lost. He charged us 400.00 and came up with nothing!!! He told us on 2 occasions that Kimber was dead. One.. She must have fallen through 3 inches of ice.. Two.. Someone hit her and threw her body into a dumpster!! It was just a horrible heart wrenching experience. This is a warning to others not to hire him. He's nothing more than fraud! Kimber is home safe. I will continue to tell other about him. I HAVE that right since, as I have been told, we are victims of him!!

Jan 23 at 8:16 AM Like • i 3 • Reply

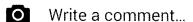


Write a comment...



The Dogs came up empty. We received a call from a very sweet Bus Driver who swore she saw Kimber several miles away. We went there right away and saw tons of footprints. Jamie's dogs didn't react at all so we were told it wasn't Kimber. 9 weeks later we realized it was!!! The 1st time he came out "tracking" he said Kimber had probably fallen through the ice. The ice was checked and there were no breaks. The 2nd time he came out, per our contract, and came up with nothing, he said that the area had been compromised by our other Dog. Think about it, if Kimber smelt our other dog she would have followed his scent to get back home!!! His explanation to us for not finding her was that someone must have hit her and dumped her body in a dumpster. We were sick!!!! Jamie is a complete con artist that takes advantage of people at they're most vulnerable time. You're desperate and will do anything to get your baby back. He takes those emotions and runs with them!!! PLEASE.. Don't make the same mistake that we did. He needs to be exposed for the fraud that he is!!

5 hours ago Edited Like • 1 2 • Reply









Dawn Titus-Bankert

I STRONGLY, advise anyone with a missing Pup to never contact or hire Packleaders Pet trackers to search for a lost or missing Dog. We hired them a year ago. Our Pup Kimber was missing for 9 weeks in the dead of winter during the coldest part. When we hired Jamie. she had only been lost for ONE day!! We paid a lot of money. He came out and followed what he called " a scent". The Dogs came up empty. We received a call from a very sweet Bus Driver who swore she saw Kimber several miles away. We went there right away and saw tons of footprints. Jamie's dogs didn't react at all so we were told it wasn't Kimber. 9 weeks later we realized it was!!! The 1st time he came out "tracking" he said Kimber had probably fallen through the ice. The ice was checked and there were no breaks. The 2nd time he came out, per our contract, and came up with nothing, he said that the area had been compromised by our other Dog. Think about it, if Kimber smelt our other dog she would have followed his scent to get back home!!! His explanation to us for not finding her was that someone

Write a comment...



EXHIBIT O



Linda George Faber I have known Jamie Genereux for many years & have worked with him on missing pet cases. JAMIE IS NOT A FRAUD and is, in fact, an expert in his field. The accusations in this article sound identical to those that Missing Dogs Massachusetts' volunteers frequently tell owners of lost pets to deter them from using his service.

Like · Reply · 1w



Ellen Grealish Then how'd he track a dog and find it's "remains" at a pond said dog was never at?

Like · Reply · 5d



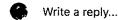
Linda George Faber Amelia Ferreira is a pathological liar! I trust Dexter's nose more than I'll ever trust anything that POS has to say.

Like · Reply · 5d

Ellen Grealish Yeah, the dog drowned in the lake in Wrentham, but she dragged the body back to Rhode Island..... seems totally likely 🔄

Like · Reply · 3d









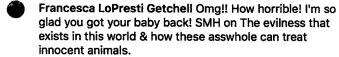




Melinda Lawrence When my dog Bosun went missing (who Turtleboy generously shared his missing poster for me at the time) I also hired Packleaders Pettrackers to track him. I was desperate at the time. I paid him \$750 to track Bosun over 2 days. He first told me he tracked him to the Providence River and that he had jumped in and drowned. I argued that could not be the case as he doesn't like water and the next day he told me he must have been picked up by someone and was likely used as a bait dog since the people didn't turn him in. I was beyond upset. Luckily he was found a few days later locked in the water treatment facility in Rumford and had been there the whole time. I had brought Jamie and his tracking dogs to t exact spot he was found because I felt he was there and his dogs "didn't get a hit there". I'm so happy this company is finally being exposed for the fraud it is.

Like · Reply · 1w · Edited





Like · Reply · 1w



Kathy LeBlanc I remember it and felt bad that you got taken by him. Hope Bosun is doing well!

Like · Reply · 1w

1 2

Angelo DocHolliday Graziano Glad you got your dog back . Seems like this tracker thinks every missing dog runs away and commits suicide by drowning themselves.

Like · Reply · 1w



EXHIBIT P



Helping Lost/Found Pets On Cape Cod...



17 hrs Like More



Karen Homer Monteiro

He's also being investigated in the Knox case (Jarod Mayo's bulldog that was found dead)

17 hrs Like More



Denise Lauren

Ok so sorry I do know he found lioness last year

17 hrs. Like More



Karen Homer Monteiro

Denise Lauren he also lied to Steve many times

16 hrs Like More



Karen Homer Monteiro

Denise Lauren not DCX , Lioness's Owner Steve , sorry for confusion

15 hrs Like More



Judith Wilson

Denise Lauren he did not find lioness there were calls of sightings he set Cathy's own trap at the sighting area and caught him in the trap!!

It had nothing to do with tracking at all. FYI

12 hrs Like More





Open



Anna L. Geraghty

and talk to Missing Dogs MA if you haven't already....they are "gods" (note use of small "g" don't want let it go to their heads!). They will connect you to the right "gods" in your area.....they walk on water as far as I'm concerned

23w Like Reply



Jane Newberg

there are pet trackers that do not charge, and they have a high success rate. the more people you have looking in the area, the more likely it is that the dog will run off farther from where it originated. best thing to do is research a tracker with a high success rate (sheila graham).

23w Like Reply





Judith Wilson

There are organizations that are free abd have highly experienced volunteers please reach out to a non profit group before you waste your monies on a fake business. Best of luck. Prayers up

23w Like Reply





Write a comment...

















EXHIBIT Q

LAW OFFICES OF

DINICOLA, SELIGSON & UPTON, LLP

6 Beacon Street, Suite 700 Boston, MA 02108 Tel (617) 279-2592 Fax (617) 426-0587 Email info@dsu-law.com

November 19, 2018

Damon M. Seligson 617-279-2597 damon.seligson@dsu-law.com

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Beth Orr, President Missing Dogs Massachusetts 240 Elliot Street Newton, MA 02464

Re:

Jamie Genereux/PackLeader PetTrackers Cease and Desist/Demand for Relief

Dear Ms. Orr:

Please be advised this law firm has been retained by Mr. Jamie Genereux, the owner of PackLeader PetTrackers ("PPT"), to represent his and PPT's interests in connection with certain false and defamatory statements, and various commercially disparaging statements that have been, and continue to be, maliciously and intentionally published about him and PPT by certain Missing Dogs Massachusetts' ("MDM") directors, volunteers and other affiliated individuals.

This letter serves as formal notice to MDM, its directors, volunteers and any other affiliated persons, that in addition to other demands set out below, such conduct – described further herein – must cease and desist immediately. Not only has the said conduct served to harm Mr. Genereux's reputation, it has caused PPT to suffer, and continue to suffer, actual business losses. Indeed, given the serious reputational and economic harm that such conduct has already caused Mr. Genereux and PPT to suffer, we are preparing to pursue such claims in Court, including claims for commercial disparagement, defamation, misrepresentation, tortious interference with advantageous business relations and violation of the Massachusetts Consumer Protection statute (M.G.L. Chapter 93A, Section 11) for MDM's unfair and deceptive methods of competition.

In the interim, please be advised if this letter is disregarded and MDM fails to resolve this matter with my client and the conduct complained of herein continues that will serve only to compound the damages Mr. Genereux will seek to recover, including an award of multiple punitive damages, attorney fees and costs under Chapter 93A. Also, in litigation, subpoenas and electronic searches of MDM's, its directors' and volunteers' social media accounts, email accounts, electronic files etc. will assuredly produce even more evidence supporting the claims set forth above. The technology used for such searches will reveal not only current false and

Ms. Beth Orr, President November 19, 2018 Page | 2

disparaging commentary and statements, but also those made in the past which have been deleted.

MDM is hereby put on notice of its legal obligation to maintain and preserve any and all documents, materials, communications and information, in any form whatsoever (e.g. hard copy, electronic formats such as emails, texts, instant messages, social media posts, website comments and posts etc.) ("Information") that may be potentially relevant to the subject matter of, or discoverable in any potential lawsuit arising from the actions and activities set forth in this letter. This obligation includes ensuring that all MDM directors, volunteers and other affiliated individuals are aware of and honor this legal obligation to maintain and preserve all Information in their possession related to the subject matter of this letter. The Information MDM, its directors, volunteers and other affiliated individuals must preserve and not delete includes, without limitation, all internet and social media posts, comments, replies, "likes," shares, emails, text messages, instant messages and other electronic communications regarding Mr. Genereux, PPT, troll(s), minion(s), missing pet search dogs, trackers, tracking dogs, search dogs and the matter of former New England Patriot, Jerod Mayo's, missing (now found deceased) bulldog, Knox, including without limitation communications, discussions, documents, investigations with any member or representative of the Mayo family and the Rhode Island ASPCA.

By way of background, Mr. Genereux is a lifelong hunter and hunting dog trainer. He has decades of experience training and handling off-leash canines to follow scent and handler direction. He is a former licensed private investigator who worked in this field for almost a decade. Since approximately 2006, Mr. Genereux has worked as a canine search and rescue professional, including working with Rhode Island Canine Search and Rescue ("RICSAR"), a nonprofit search and rescue organization utilized by the State of Rhode Island for human search and rescue, including wilderness search and rescue, urban search and rescue, water rescue/recovery and cadaver search and recovery. In 2010, he launched PPT, which has since grown into a successful, well-recognized and well-respected company.

Despite his well-earned reputation, MDM directors, volunteers and other affiliated individuals have repeatedly taken to internet websites and social media to post ad hominem attacks against Mr. Genereux, his company and his profession. MDM, which is a resource for many lost dog owners in Massachusetts and other surrounding states, maintains that in 2017 it received more than 1800 lost or found dog forms, which owners fill out so their missing pet's poster can be included on MDM's social media and online properties. MDM further promotes that it reaches out to every owner whose dog is posted on their page. When MDM makes this initial contact, these owners are distraught, vulnerable and simply want to get their lost pet home. Based on this guaranteed initial interaction by MDM with lost pet owners, at the very beginning of the owner's search process, my client has a well-founded, good faith concern that MDM uses this opportunity to cast doubt on his skills, disparage him and his company, scaring and misleading lost pet owners about his qualifications, credibility and character in particular, and missing pet search dog services in general. Additionally, MDM's social media and internet presence via its directors and volunteers provides a constant platform for the repeated dissemination of harmful and commercially disparaging content about Mr. Genereux and PPT.

Ms. Beth Orr, President November 19, 2018 Page | 3

dissemination of harmful and commercially disparaging content about Mr. Genereux and PPT. Indeed, by way of example, MDM volunteers and directors have openly described Mr. Genereux (and PPT) as a "scam artist" and a liar (See **Exhibit A**, Karen Homer Montiero); a "troll" who stages "photo-ops" aimed at misleading the public (See **Exhibit B**, Sheilah Graham); a "predator" (**Exhibit C**, Kathy Leblanc Worrick); someone whose behavior is "criminal" charging "\$500 just to walk up to your front door..." and someone who "should be in jail" (**Exhibit D**, Kristin Ericson and Victoria Callahan). These are but a very small sampling of the false and disparaging statements that are made by MDM's directors and volunteers on the internet and social media, including Facebook and other websites.

Under Massachusetts law, a defamation action, which encompasses libel and slander, affords a remedy for damage to the reputation of the injured party. See White v. Blue Cross & Blue Shield of Mass., Inc., supra; Ravnikar v. Bogojavlensky, 438 Mass. 627, 629–630, 782 N.E.2d 508 (2003). The elements of a defamation claim are satisfied when a plaintiff can show that the defendant published a false statement about him to a third party that either caused them economic loss or was of the type that is actionable without proof of economic loss. Id. A false statement that "would tend to hold the plaintiff up to scorn, hatred, ridicule or contempt, in the minds of any considerable and respectable segment in the community," would be considered defamatory, Stone v. Essex County Newspapers, Inc., 367 Mass. 849, 853 (1975), and the imputation of a crime is defamatory per se, requiring no proof of special damages. See Lynch v. Lyons, 303 Mass. 116, 118–119 (1939). Additionally, with respect to the tort of commercial disparagement, it is well-established Massachusetts law that "[o]ne who publishes a false statement harmful to the interests of another is subject to liability for pecuniary loss resulting to the other if (a) he intends for publication of the statement to result in harm to [the] interests of the other having a pecuniary value, or either recognizes or should recognize that it is likely to do so, and (b) he knows that the statement is false or acts in reckless disregard of its truth or falsity."

We are confident that if the facts of this matter are presented to a jury, it is clear Mr. Genereux has been defamed and that PPT has suffered damages for commercial disparagement. In particular, as a direct and proximate result of false and defamatory statements that have been, and continue to be, published about Mr. Genereux, his business and missing pet search dogs, by MDM in-person, on social media and linked websites, both his reputation and his business have been severely damaged. Through this consistent pattern of statements, MDM demonstrates its intentional, systematic, widespread, company-endorsed policy and strategy to disparage and damage Mr. Genereux and the company's reputation. These statements are not opinions, but are instead aimed at casting Mr. Genereux, PPT and missing pet search dogs in a negative light. The statements are intended to harm his reputation and his business and with great clarity convey MDM's desire and ultimate goal to deprive Mr. Genereux of his livelihood by destroying his reputation and that of his business. These false and defamatory statements provide, directly and by reasonable inference, that he is a predatory scam artist who takes advantage of vulnerable people in a desperate predicament to locate their beloved missing pet. Furthermore, these statements relentlessly disparage him because he may charge a fee for his expertise and services. characterizing him as dishonest and unscrupulous for doing so. Such statements are false and defamatory. They are likewise not conditionally privileged, and instead, are actionable. In

Ms. Beth Orr, President November 19, 2018 Page | 4

with Mr. Genereux's business, either via such publications or at the initial lost pet owner outreach stage, are likewise actionable for tortious inference with advantageous business relations.

Accordingly, this letter shall serve as notice on MDM – including its volunteers, directors and those persons who are associated or affiliated with MDM – that this type of offensive and wrongful behavior will not be tolerated and is to cease and desist immediately. To that end, MDM shall remove, and demonstrate such removal to Mr. Genereux's satisfaction, all mentions of, including any inferred references to, Mr. Genereux and PPT from any and all public forums, channels and domains, whether written, electronic, internet, social media, television, print or other media coverage in which MDM, its directors, volunteers or other affiliated individuals made false, inaccurate or misleading statements about Mr. Genereux, PPT and missing pet search dogs. MDM shall also refrain going forward from mentioning Mr. Genereux, his work, business or missing pet search dogs in general to anyone involved or inquiring about finding a lost pet or otherwise.

We request a response to this letter no later than 7 days from date of letter. If we do not hear from MDM within this time frame of its sincere and good faith intent to promptly address the issues set out above and to further resolve this matter with appropriate compensation, my client expressly reserve the right to pursue all of the claims that he has under applicable law by commencing suit as described above, including claims for damages and injunctive relief, and nothing is waived or released by virtue of this letter.

Please contact me at the number above to discuss resolution of this matter.

Very truly yours,

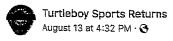
DINICOLA, SELIGSON & UPTON, LLP

Damon M. Selleson

DMS/ Enc.

cc: Mr. Jamie Genereux

EXHIBIT A



Part 3 of Exposing Off Leash K9 Training LLC: Baloo's story and more:





TURTLEBOYSPORTS.COM

Exposing Off Leash K9 Training LLC Part Three: Former Employees Come Forward, Becca The Beast Fired, And ... Story



29 Comments 17 Shares

Like

Comment

Share

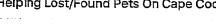


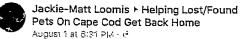


Karen Homer Monteiro When is the article about the scam artist Jamie from Pack Leaders pet tracking coming out? He's such a scam that preys on people desperately looking for their lost pets . He said another persons pet was dead and it walked into a store shortly after . Blows my mind he said Knox drowned in this pond when Knox was never even there to begin with

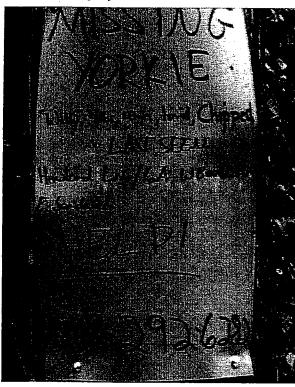
Like · Reply · 5h

⟨ Helping Lost/Found Pets On Cape Cod...





These are all over East Sandwich I hope he is found! Keep your eyes open! $\ensuremath{\mathfrak{E}}$





Open

Helping Lost/Found Pets On Cape Cod...



👊 Verizon 🖘

Denise Lauren

This person should contact Jamie he will find the dog good or bad. This is his info

17 hrs Like More



Denise Lauren



Jamie Genereux



17 hrs Like More



Karen Homer Monteiro

I would not ever recommend Jamie and Pet Trackers

17 hrs. Like More



Karen Homer Monteiro

He's also being investigated in the Knox case (Jarod Mayo's bulldog that was found dead)

17 hrs Like More

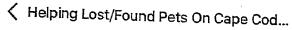


Denise Lauren

Ok so sorry I do know he found lioness last



Open



介

17 hrs Like More



Karen Homer Monteiro

He's also being investigated in the Knox case (Jarod Mayo's bulldog that was found dead)

17 hrs Like More



Denise Lauren

Ok so sorry I do know he found lioness last year

17 hrs Like More



Karen Homer Monteiro

Denise Lauren he also lied to Steve many times

16 hrs Like More



Karen Homer Monteiro

Denise Lauren not DCX , Lioness's Owner Steve , sorry for confusion

15 hrs Like More



Judith Wilson

Denise Lauren he did not find lioness there were calls of sightings he set Cathy's own trap at the sighting area and caught him in the trap!!

It had nothing to do with tracking at all. FYI

12 hrs Like More



Open

EXHIBIT &





RANT: Long over due - read it and deal with it, you don't want to read it, simply scroll by.. I could care less either way.. This simply has to be addressed. No better time than the present.

So fairly recently I have been asked to assist with lost dogs pretty much locally, however, I am able to guide those across country as well (atleast there is no resistance/hesitation with those owners, and they do EVERYTHING they need to do). People reach out to me to assist, friends suggest owners reach out to me to assist etc. Some simply find me on Facebook or through Google. I Volunteer (that is right, I don't get paid one penny to assist you) my time to assist each and every one of them as best I can. You receive special flyers since the ones you most of the time are useless and cluttered (not intentional, since you are doing the best you can), with special tasks to be undertaken to bring your lost dog home. A map is set up to monitor and track your dogs progress and travel patterns. Some of you go above and beyond and get your pup home sooner, others drag their feet, and it takes a bit longer, some of you don't do anything, so why should I?!? Then the last group of people decide after we have started working through the process with them, that they simply want to invest and "Hire" a different option for their search process. In all honesty, as I have stated before, I don't care how your

















RANT: Long over due - read it and deal with it, you don't want to read it, simply scroll by.. I could care less either way.. This simply has to be addressed. No better time than the present.

So fairly recently I have been asked to assist with lost dogs pretty much locally, however, I am able to guide those across country as well (atleast there is no resistance/hesitation with those owners, and they do EVERYTHING they need to do). People reach out to me to assist, friends suggest owners reach out to me to assist etc. Some simply find me on Facebook or through Google. I Volunteer (that is right, I don't get paid one penny to assist you) my time to assist each and every one of them as best I can. You receive special flyers since the ones you most of the time are useless and cluttered (not intentional, since you are doing the best you can), with special tasks to be undertaken to bring your lost dog home. A map is set up to monitor and track your dogs progress and travel patterns. Some of you go above and beyond and get your pup home sooner, others drag their feet, and it takes a bit longer, some of you don't do anything, so why should I?!? Then the last group of people decide after we have started working through the process with them, that they simply want to invest and "Hire" a different option for their search process. In allhonesty, as I have stated before, I don't care how your











Volunteering their time, while this other person charges approximately \$100 an hour for a stroll with their pup, if they even utilize them at all.. Which currently will also run you a 3 days rate of \$100 a day MINIMUM. Oh, and if they leave equipment, they will charge you for that too. That is one of the many difference between Volunteering ones time and efforts to assist a devastated family, instead of causing them to spend their hard earned money on something they are quite capable of doing on their own.. However, this person misleads them in to thinking that this infact is not possible. How wrong this is. This is how desperate they are. They are gullible to what this asshat says. I am a huge fan of KARMA, she is relentless, and this person will get theirs in due time. Sadly not soon enough.

As an owner you need to do what you feel is right... I tell you this right up front, I can only offer you suggestions, what you do with it is up to you. No regrets... However, be open and honest with me. You want to utilize a different option, have the integrity and decency to tell me up front before you take all the info I have to offer you. Let your paying person provide you with their information or tips to guide you. Only thing I ask, keep me up to date with your progress and sightings. I have no desire to interfere with your process, I simply wan tot be up to speed incase your paid party deserts you in the middle with no results.. This saves time, since I won't have to piece everything together again and is critical for your













no results.. This saves time, since I won't have to piece everything together again and is critical for your pups safety. I, unlike others, do not interfere when someone else is already working with a family.

Any dog that is lost and moving around, sees anything as a Predator. They will not allow their own humans to approach them, let alone a stranger and their dog. They need to settle down into one area, this makes it easier to be able to secure them using a Humane Trap that gets monitored by a trail camera or two. Flyers are critical for you to get your sightings.. YOU are the ground pounder. From the start I am on you to complete all your tasks and stay in touch with progress so I can make further suggestions for the next step or steps.

There is no need to comment here, I know what I do, what I have done, and what I will continue to do to eliminate the need for this person. Just a matter of time, til that income will deplete. Remember: Trolls and Minions exist, they monitor my page (as well as other Lost Pet pages) and reach out to those people I have already initiated contact with. Guess business must be slow to have to troll a Volunteers page.

Takeaways/Warnings:

People who own dogs. Please take care of them. They are your responsibility. Imagine having to live with the fact that they had to die, get tortured or



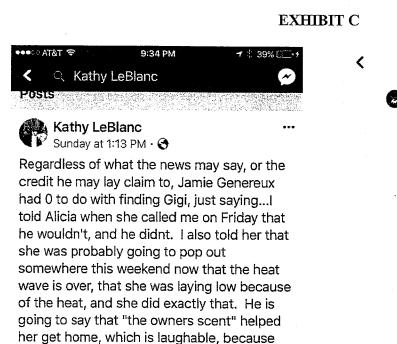












people. **0** 6

10 Comments

心 Like

⇔ Share



Kathy LeBlanc updated her profile

dogs make their way home all on their own for

the love of God. I am glad that she is home,

and I am glad Alicia is out only a few hundred

bucks instead of thousands. He is a predator,

and needs to stop taking advantage of











Alicia's Post

Celeste Moran

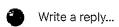
I guess Kathy and the owner that posted earlier were correct about the tracker. You don't need one she was walking down the street on her own from what I have read on previous posts that's how she was found. Unfortunately this happens a lot a tracker will tell you they have found your dogs scent and then will set up equipment and owners are then roped in. Costing hundreds sometimes thousands of dollars. Always buyer beware!

2d Like Reply

Steven Copeland

WRONG!!! He found our beautiful GiGi and if anyone has something to say about Jamie/Sharon Live at 13 Birch Bottom Cir Rockland MA. Come talk to me face to face. I will not be responding to any cowards posting a rebuttal here

1d Like Reply



(0) Write a comment...











3

63



Here is what Jamie Genereux from Packleader Petrackers is pissed about and decided to troll my post yesterday. The post in question (that was put on public so it could be shared if any of you wanted to share) was asking for help as some volunteers at MDM were looking for someone to let us borrow some fencing to help us with a dog. Yes, we are volunteers and don't get paid for what we do, he does, and charges hundreds and thousands of dollars (depending on how much the owner has) to bring his dogs to track the target dog. So this is one of our philosophical differences.

His shtick is that everybody should be able to spend this money to find their dog (which again, comes with no guarantees), ones finances should not have anything to do with it. He does not say this to people who reach out to him, but that is how he feels. He thinks MDM, Granite State Dog Recovery, Budda Dog Recovery, and generally any other dog rescue organization sucks and are run by a bunch of hacks. Go ahead Jamie, challenge me on this one too buddy.

So anyway, the first picture is of him holding "Zoey" (notice he does not even use her name). Keep this picture and the narrative he writes on the post in mind when reading the next part....

As it turns out, two 2 kids and their dog (ironic that the kids dog helped find her and Jamie's didn't, LOL) down the street from where she went missing actually found her, HE DID NOT, yet gave the kids 0 credit or kudos, when they were really the hero's of this story, not him or Jodi Greenleaf, the only people mentioned in the narrative. I guess they were the "everyone else".

The next 2 pictures are screenshots of Tom Salviati (the kids dad) and Erin Langlois-Noble (related to the owner of the dog). Erin acknowledges and thanks Tom, and Tom's kids get the reward.

So yes, I do have a problem with these kids not getting the credit that they deserve, either by Jamie, Jodie, and sadly enough, the owner of Zoey that only praises Jamie and Jodi, and gives very little mention of the

So go back to the picture...Doesn't show the same thing now, does it. It makes him look like HE is the hero and he "rescued" her...Please note. that she was already safe and secure in the house and should have been brought right in the car safely....but NOOOO, evidently he had to walk her back, instead of being safe, getting her on a leash and into a car to be driven back to the home to decompress. Please also note that the finders also called the owner, so my guess is that the owner was there too, so why she needed to be walked back perplexes me.

Zoey, when she went missing, just had surgery and was on a mess of medicines. She didn't go far, she had always been hunkered down very close by (note that she was found a few houses down), because, unless chased out, chasing something, or generally known as a runner, they generally tend to stick close by. The owners were told that she was all over the place in the woods behind her house, but given the medical state she was in, and clearly very near by (though he says, the owners "scent" lead her back to the area...idiot...hahahahaha), why in the hell were those dogs NOT able to find her...in tracking terms...SHE WAS RIGHT THERE.

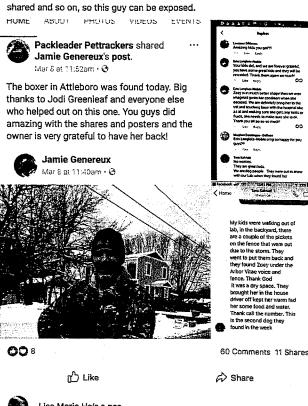
So yeah, wherever I saw this blatant lie being shared by both him and Jodi, pushing his services and claiming how wonderful Jamie is, in the various lost dog pages, I called them out on it at every opportunity, and he is butt-hurt, because I am right, and he knows it. That is why he troll my page and give me shit for asking for help with a dog (very professional by

My purpose of this post is to expose him for his lack of transparency as

page and give me shit for asking for help with a dog (very professional by

My purpose of this post is to expose him for his lack of transparency as to the number of dogs he and his dogs actually find, and generally, "how he works", and how he will walk away when the money dries up. People should not have to set up GoFundMe accounts to pay him, to only probably NOT being able find their dog, nor should they not be able to pay a utility bill or rent, or use their savings to pay him, to only probably NOT being able find their dog. I guess to him and us, find means very different things...

My hope one or two of you can share this in hopes that it will be re-



Lisa Marie He's a pos

Like · 23w

Nancy Whelpley Bersani Just Wow

Like · 23w



Jamie Genereux I love how you try to turn it around and make it look like i'm the one trolling your page after you tag me in a million posts yesterday. Pretend you're all ethical and just want to give the people proper credit.

Like - 23w

↑ Hide 31 Replies



Kathy LeBlanc Hey idiot, FB doesn't work that way, I cannot tag you if I am not FB friends with you. Want to tell another lie?? You mean that we don't give "YOU" credit you mean....That is because you really dont find the dog...You find fur and make the owners beli... See More

Like · 23w · Edited



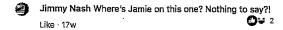
comments back to me! PLEASE!!!

Like · 23w



Kathy LeBlanc Yes Jamie, I deleted your comment, it was truly hateful, but I am not surprised you would stoop to that level. It has no point to the discussion here except to be just that, hateful. If you would like to defend your position with her, please do so. Stop deflecting when you know you are wrong....

Like · 23w · Edited



Sheilah Graham CRICKETS!!! Nothing new there... He is a better dancer than Fred Astaire, dances right around a question and re-directs an attack on whoever has him trapped in his own comments... It is typical...

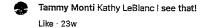
Like · 16w



Tammy Monti He sounds like a looser.

Like · 23w

Kathy LeBlanc He has a personality disorder...
Like · 23w





Dawn Marie He's a con artist who rips off people when they're vulnerable. He charges 5-600.00 and maybe more to "search" for a lost dog. It's sickening!

Like · 23w

Sharon Ferrara That's disgusting! He should be ashamed of himself.

Like · 23w

Tammy Monti CREEP!!!!

Like · 22w



Sheilah Graham Trolls Trolls and more trolls... They need better hobbies... Not worth your time and energy Kathy \mathbf{g}^n ?

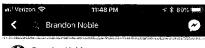


Like · 17w

Kathy LeBlanc Bye bye Mike, are you going to create another troll post Jamie?

Like · 16w · Edited

⊕≅ 3



Brandon Noble
March 8 · 3

Amazing. Thank you Jodi and Jamie! Thank you to all the volunteers and to the children that called us.

r Like

○○ 34

1 00//////

Comment Comment

Brandon Noble updated his profile picture. ...

March 8 · 3



Brandon's Post



Rhonda Dutton

Thank heavens you found her...where was she?

22w



Brandon Noble

She was hiding under a fence a few houses down, but she must have followed our scent back from the powerlines and the trackers dogs were going nuts today and wouldn't leave the area. That's why, she went to the pond to drink and then seek shelter. Shes skinny and we'll be going to the very but nuts how she survived and actually looks okay!

22w

○○ 13

Rhonda Dutton
Such wonderful news!!!!
22w

Melyssa Braman Yay!!

22w

Frank Thompson
Great News So Happy For You Guys
!!!













Melyssa Braman

By the way, I've never really thought about using dog trackers to track a lost dog, but that's brilliant and effective :-)

22w





Brandon Noble

It was very effective - I was skeptical at first but he knew what he was doing and because of him Zoey found our scent and was able to follow us back home.

22w





Catherine White Yay!!!!

22w





Julie Sigman Boudreau

I'm so happy she's found and safe. Hopefully she checks out at the vet with flying colors!

22w





Lee Brown

OMG THIS IS THE BEST...SOOOOOO HAPPY!!!

22w





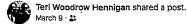












I am confused. I thought Jamie Genereux found Zoey. Linda George Faber?

Missing Dog! Attleboro MA



Boxer

"Zoey"

Female

10 months/40 lbs

Brown w/ Black Mask Shaved in several spots **Wearing Collar**

3-5-18

• Chat (16



Erin Langlois-Nobie Just an FYI to all, I am the owner of this Boxer and if it wasn't for Jamie Genereux and all his hard work Zoey wouldn't be home. I believe everything he did with my husband and his dogs brought Zoey back to our neighborhood where she was found. Zoey was on a lot of medications and sick, she was pretty disoriented. She found her way back here because of Jaimie and was thankfully found. There are 3 people who know the entire story, myself, my husband and Jaimie. If others want to fabricate there version of the story then so be it, but they don't have a clue about any of it.

Like - Reply - 22w



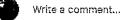
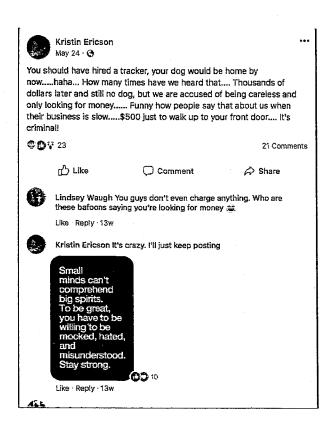




EXHIBIT D



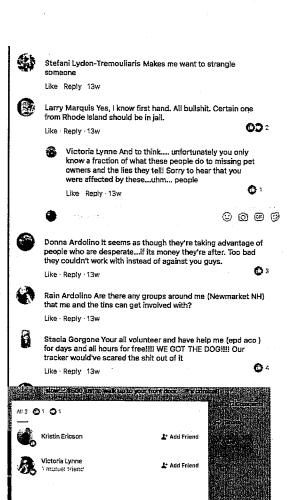


EXHIBIT R

Morrissey, Hawkins & Lynch

ONE INTERNATIONAL PLACE

Boston, Massachusetts 02110-2600

TELEPHONE 617-345-4500 FACSIMILE 617-345-0286

PAUL R. MORDARSKI*
Partner
*also admitted in CT

DIRECT 617-748-5404 pmordarski@mhlaw.com

December 31, 2018

Damon M. Seligson, Esq. DiNicola, Seligson, & Upton, LLP 6 Beacon Street, Suite 700 Boston, MA 02108

Re:

Jamie Genereux/PackLeader PetTrackers
Cease and Desist/Demand for Relief

Response from Missing Dogs Massachusetts

Dear Attorney Seligson:

Please be advised that this law firm represents Missing Dogs Massachusetts ("MDM"). We are in receipt of your letter to MDM dated November 19, 2018. It should be noted that Ms. Beth Corr was not in receipt of this letter until November 28, 2018.

In your letter, you assert five claims against MDM: defamation, commercial disparagement, misrepresentation, tortious interference with advantageous business relationships, and violation of the Massachusetts Consumer Protection statute (M.G.L. Chapter 93A, Section 11). It is unlikely that Mr. Genereux would succeed on any of these claims if presented to a jury.

First and foremost, MDM has not engaged in any unfair and/or deceptive methods of competition, and therefore, your claim that MDM has violated the Massachusetts Consumer Protection statute (M.G.L. Chapter 93A, Section 11) must fail on its face.

MDM, as an organization, has not made any false or defamatory statements against Mr. Genereux or PetLeader PetTrackers ("PPT"), nor has MDM made any commercially disparaging statements against Mr. Genereux, PPT, or pet tracking in general. In fact, MDM is neutral in responding to inquiries regarding pet tracking services and on its website, MDM suggests that consumers perform due diligence by researching trackers before deciding to go that route. MDM also does not endorse any particular service or provider of pet tracking. Additionally, social media posts by MDM do not mention pet tracking, Mr. Genereux, or PPT, directly or indirectly.

Morrissey, Hawkins & Lynch

Damon M. Seligson, Esq. Page 2 December 31, 2018

The majority of the individuals referenced by Mr. Genereux in his letter dated November 19, 2018, either were previously volunteers but are no longer active volunteers of MDM, or have no affiliation with MDM whatsoever. If any statements were made during a time in which any of the previous volunteers were active volunteers, these individuals made these statements outside the scope of their role and duties as a volunteer of MDM through their personal Facebook accounts or other social media accounts. See 42 U.S.C. § 14503 (2012) (maintaining that volunteers are not liable if they are acting within the scope of the volunteer's responsibilities). As you know, in regard to Kristin Ericson, her response letter dated November 1, 2018, was sent separately as the social media posts attached as Exhibit D to your letter dated November 19, 2018, were made from her personal Facebook account and made outside the scope of her role as a director and volunteer of MDM.

Moreover, the allegations made in your letter regarding MDM's "desire and ultimate goal to deprive Mr. Genereux of his livelihood by destroying his reputation and that of his business" are completely unfounded and quite frankly, dramatic. MDM is a small nonprofit organization that is comprised of volunteers that come together in a grass roots approach to reunite missing and found dogs with their owners. MDM does not charge the public for its services, and therefore, the goal in depriving Mr. Genereux of his business does not exist.

MDM has a neutral position when it comes to pet tracking services, which is explained to volunteers during MDM's volunteer training session. All volunteers are required to participate in this training session before becoming a volunteer of MDM. At this training, Volunteers are instructed by MDM to maintain and communicate MDM's neutral policy to pet owners who ask about pet tracking services when acting in his/her role as an MDM volunteer. Therefore, there is simply no "consistent pattern of statements" amounting to an "intentional, systemic, widespread strategy to disparage and damage Mr. Genereux and the company's reputation." Because of this, your claim of tortious interference with advantageous business relations must fail.

Further, you demand that MDM "refrain going forward from mentioning Mr. Genereux, his work, business or *missing pet search dogs in general* to anyone involved in or inquiring about finding a lost pet or otherwise." (emphasis added). This demand as to the emphasized portion is too broad and inappropriately restrains MDM's and its volunteers', directors', and those persons who are associated and affiliated with MDM, constitutional right to free speech. MDM has a neutral stance on pet tracking and advises its volunteers to communicate MDM's neutral message to those who inquire about pet tracking services.

MDM only has control over its own Facebook account (@missingdogsmass). MDM does not have control over current volunteers', past volunteers', directors', and/or affiliated persons' social media accounts. With that being said, MDM certainly does not have control over the social media accounts of those who are unaffiliated with MDM. Therefore, MDM will

MORRISSEY, HAWKINS & LYNCH.

Damon M. Seligson, Esq. Page 3 December 31, 2018

continue its silence with regard to Mr. Genereux and PPT on its Facebook page (@missingdogsmass), the only Facebook page in which MDM has control over.

As a sign of good faith, MDM will reiterate and distribute its neutral policy regarding pet tracking to all current directors and current volunteers of MDM.

Very truly yours,

Paul R. Mordarski

PRM/pow

cc:

Ms. Beth Corr

Ms. Kristin Ericson

EXHIBIT S

LAW OFFICES OF

DINICOLA, SELIGSON & UPTON, LLP

6 Beacon Street, Suite 700 Boston, MA 02108 Tel (617) 279-2592 Fax (617) 426-0587 Email info@dsu-law.com

November 19, 2018

Damon M. Seligson 617-279-2597 damon.seligson@dsu-law.com

<u>VIA CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

Mr. Aidan T. Kearney Worcester Digital Marketing, LLC f/k/a Turtleboy Digital Marketing, LLC 116 Brookline Street Worcester, MA 01603

Re:

Jamie Genereux/PackLeader PetTrackers Cease and Desist/Demand for Relief

Dear Mr. Kearney:

Please be advised this law firm has been retained by Mr. Jamie Genereux, the owner of PackLeader PetTrackers ("PPT"), to represent his and PPT's interests in connection with certain false and defamatory statements, and various commercially disparaging statements that have been, and continue to be, maliciously and intentionally published about him and PPT on social media and other websites owned, operated and/or controlled by Worcester Digital Marketing, LLC f/k/a Turtleboy Digital Marketing, LLC ("Turtleboy").

This letter serves as formal notice to Turtleboy, its directors, officers and any other affiliated persons, that in addition to other demands set out below, such conduct – described further herein – must cease and desist immediately. Additionally, demand is hereby made that all such offending content referring to Mr. Genereux and/or PPT is to be removed and retracted from such websites, social media, and wherever else it may appear, immediately, including the posted articles titled "Off Leash K9 Training And Associates Expose To Come [sic] In A Several Part Series Detailing Allegations Of Abuse, Missing Dogs and Death" and "Off Leash K9 Training, LLC Exposed Part 1: The Story Of Knox And The Bootleg Trainer Amelia Ferreira Who Is Responsible For His Death," written by Esther Manchester, and all posts, comments and associated information that refers to or links to this article. The articles at issue are appended hereto as Exhibit A.

Not only has the said conduct served to harm Mr. Genereux's reputation, it has caused PPT to suffer, and continue to suffer, actual business losses. Indeed, given the serious reputational and economic harm that such conduct has already caused Mr. Genereux and PPT to suffer, we are preparing to pursue such claims in Court, including claims for commercial disparagement, defamation, misrepresentation, tortious interference with advantageous business

Mr. Aidan T. Kearney November 19, 2018 Page | 2

relations and violation of G.L. c. 93A (the Massachusetts Consumer Protection statute) based on such unfair and deceptive trade practices.

The articles at issue contain statements and assertions that are false and defamatory, including promising readers that an "investigation into [PPT] is going to be enraging"; that Mr. Genereux "likes to take credit for other people's finds" and "will readily charge an insane amount of money to produce nothing," and disparaging Mr. Genereux's expertise, skill and competence. See **Exhibit B**, appended hereto. With the exception of his name and the company's name, every other statement made in the articles about Mr. Genereux, PPT, his work in general and in the case of former New England Patriot Jerod Mayo's, missing bulldog Knox, is false.

In fact, Turtleboy already knows these statements are false because its reporter, Esther Manchester, the author of the articles at issue, contacted Mr. Genereux on August 10, 2018, the day <u>after</u> the majority of these false and defamatory statements were published, to ask if he would agree to answer some questions. Ms. Manchester, however, made no effort to interview Mr. Genereux <u>prior</u> to publication of these statements to ensure the information published was accurately and truthfully reported. Without hesitation, Mr. Genereux agreed to Ms. Manchester's request, responding completely and thoroughly to all of her inquiries.

In that conversation, Ms. Manchester told Mr. Genereux: "I'm going to clear you of any deception or shady activity here;" and "Thank you for setting things straight for me. . . . I'm going to end [the next article in the series, Part II] by eluding to tomorrow's article [Part III] where I'll be discussing the whole story of your limited involvement, clearing up your name and continuing on with the series. . . . [I] will send you the article when it is run tomorrow." Though Turtleboy knew the statements it published about Mr. Genereux and PPT were false, misleading and defamatory, it never retracted its prior statements nor published the promised follow-up article "clearing" Mr. Genereux. When Mr. Genereux further followed-up with Ms. Manchester asking why Turtleboy never cleared his name or removed it from the articles, Ms. Manchester responded "Yeah, because my boss had ended the series." This statement is patently untrue, as Parts II-V of "the series" were published after Ms. Manchester's interview with Mr. Genereux. This is further evidence of Turtleboy's intent to use false, misleading and defamatory statements to harm and cause damage to Mr. Genereux and PPT. Finally, in her discussions with Mr. Genereux about the source of the information in the articles, Ms. Manchester stated that the source was her own research and speaking with "many different sources."

As admitted by Ms. Manchester, this research and these sources yielded completely false, misleading and disparaging information and came from sources clearly seeking to maliciously sully Mr. Genereux and his company's reputation. As such, we further demand Turtleboy produce the identity of all sources, including any specific individuals, organizations, articles, posts etc. pertaining to Mr. Genereux and PPT and relied upon to draft the articles in question. If this information is not timely produced, Mr. Genereux will pursue all necessary legal action against Turtleboy to obtain or compel the disclosure of such sources and information

· Mr. Aidan T. Kearney November 19, 2018 Page | 3

As a result of these false and defamatory articles and the posts and comments that follow them, both on the Turtleboy website and social media, others who either follow Turtleboy on social media websites such as Facebook have added their own baseless commentary. For instance, Mr. Genereux is described as a "fraud" (Melinda Lawrence and Donna Hurley); another commenter calls him a "maggot" who should be "hanged" (Tammi Lee Green); and others refer to him as "the scam artist . . . that [sic] preys on people desperately looking for their lost pets." (Karen Homer Monteiro). See **Exhibit C**, appended hereto. Moreover, some of these commenters work for a PPT competitor, Missing Dogs Massachusetts ("MDM"), and are now using these articles as a tool and platform to scare lost pet owners away from using PPT and instead relying solely on their company's services.

My client has made repeated attempts to have the offending content retracted and removed, but even knowing the information it published about Mr. Genereux and PPT was false, Turtleboy has blatantly failed and refused to oblige. This has compounded Turtleboy's wrongdoing. Thus, we demand that the articles and the other content described herein be removed forthwith, and if this letter is disregarded and Turtleboy continues to ignore the severity of its misconduct, it will only compound the damages Mr. Genereux will seek to recover, including an award of multiple punitive damages, attorney fees and costs under Chapter 93A. In litigation, subpoenas and electronic searches of Turtleboy's, its employees, writers, officers, directors, agents, independent contractors, consultants and other affiliated individuals' social media accounts, email accounts, electronic files, and the like, will assuredly produce even more evidence supporting the claims set forth above. The technology used for such searches will reveal not only current false, misleading and disparaging communications, commentary and statements, but also any past statements which have been deleted.

Turtleboy is hereby put on notice of its legal obligation to maintain and preserve any and all documents, materials, communications and information, in any form whatsoever (e.g. hard copy, electronic formats such as emails, texts, instant messages, social media posts, website comments and posts etc.) ("Information") that may be potentially relevant to the subject matter of, or discoverable in any potential lawsuit arising from the actions and activities set forth in this letter. This obligation includes ensuring that all Turtleboy employees, writers (freelance or otherwise), officers, directors, independent contractors, consultants and other affiliated individuals are aware of and honor this legal obligation to maintain and preserve all Information in their possession related to the subject matter of this letter. The Information Turtleboy, its employees, officers, directors, writers, independent contractors, consultants and other affiliated individuals must preserve and not delete includes, without limitation, all documents that pertain to the articles at issue, all internet and social media posts, comments, replies, "likes," shares, emails, text messages, instant messages and other electronic communications regarding Mr. Genereux, PPT, missing pet search dogs, trackers, tracking dogs, search dogs and the matter of former New England Patriot, Jerod Mayo's, missing bulldog, Knox, including without limitation, communications, discussions, documents, investigations with any member, representative, spokesperson or agent of the Mayo family, Missing Dogs Massachusetts, MDM's directors, volunteers or other associated individuals, members of any pet rescue or pet recovery groups and the Rhode Island ASPCA.

Mr. Aidan T. Kearney November 19, 2018 Page | 4

Mr. Genereux is a lifelong hunter and hunting dog trainer. He has decades of experience training and handling off-leash canines to follow scent and handler direction. He is a former licensed private investigator who worked in this field for almost a decade. Since approximately 2006, Mr. Genereux has worked as a canine search and rescue professional, including working with Rhode Island Canine Search and Rescue ("RICSAR"), a nonprofit search and rescue organization utilized by the State of Rhode Island for human search and rescue, including wilderness search and rescue, urban search and rescue, water rescue/recovery and cadaver search and recovery. In 2010, he launched PPT, which has since grown into a successful, well-recognized and well-respected company.

Despite his well-earned reputation, Turtleboy, directly and indirectly, via the articles at issue and the content that the articles have generated via social media and various linked/affiliated internet websites, has made harmful ad hominem attacks against Mr. Genereux, his company, and his profession. The content unfairly and falsely defames my client, and it serves to publicly cast doubt on his skills, disparage and malign him and his company, scaring and misleading lost pet owners about his qualifications, credibility and character in particular, and missing pet search dog services in general. Additionally, the article and Turtleboy's social media and internet presence provides a constant platform for the repeated dissemination of harmful and commercially disparaging content about Mr. Genereux and PPT.

Under Massachusetts law, a defamation action, which encompasses libel and slander, affords a remedy for damage to the reputation of the injured party. See White v. Blue Cross & Blue Shield of Mass., Inc., supra; Ravnikar v. Bogojavlensky, 438 Mass. 627, 629-630, 782 N.E.2d 508 (2003). The elements of a defamation claim are satisfied when a plaintiff can show that the defendant published a false statement about him to a third party that either caused them economic loss or was of the type that is actionable without proof of economic loss. Id. A false statement that "would tend to hold the plaintiff up to scorn, hatred, ridicule or contempt, in the minds of any considerable and respectable segment in the community," would be considered defamatory, Stone v. Essex County Newspapers, Inc., 367 Mass. 849, 853 (1975), and the imputation of a crime is defamatory per se, requiring no proof of special damages. See Lynch v. Lyons, 303 Mass. 116, 118–119 (1939). Additionally, with respect to the tort of commercial disparagement, it is well-established Massachusetts law that "[o]ne who publishes a false statement harmful to the interests of another is subject to liability for pecuniary loss resulting to the other if (a) he intends for publication of the statement to result in harm to [the] interests of the other having a pecuniary value, or either recognizes or should recognize that it is likely to do so, and (b) he knows that the statement is false or acts in reckless disregard of its truth or falsity."

We are confident that if the facts of this matter are presented to a jury, it is clear Mr. Genereux has been defamed and that PPT has suffered damages for commercial disparagement. In particular, as a direct and proximate result of false and defamatory statements contained in the articles at issue coupled with the statements that have been, and continue to be, published and hosted on Turtleboy's website and linked social media platforms, about Mr. Genereux, his business and missing pet search dogs, both his reputation and his business have been severely

Mr. Aidan T. Kearney November 19, 2018 Page | 5

damaged. These statements are not opinions, but are instead aimed at casting Mr. Genereux, PPT and missing pet search dogs in a negative light and are known by Turtleboy to be in fact false. The statements are intended to harm his reputation and his business and with great clarity convey Turtleboy's apparent desire and ultimate goal to deprive Mr. Genereux of his livelihood by destroying his reputation and that of his business. These false and defamatory statements provide, directly and by reasonable inference, that he is a predatory scam artist who takes advantage of vulnerable people in a desperate predicament to locate their beloved missing pet. Furthermore, these statements relentlessly disparage him because he may charge a fee for his expertise and services, characterizing him as dishonest and unscrupulous for doing so. Such statements are false and defamatory. They are likewise not conditionally privileged, and instead, are actionable. In addition, the activities and efforts by Turtleboy described herein are interfering with Mr. Genereux's business and are likewise actionable for tortious inference with advantageous business relations.

Accordingly, this letter shall serve as notice on Turtleboy – including its employees, writers, officers, directors, independent contractors, consultants and those persons who are associated or affiliated with the company – that this type of offensive and wrongful behavior will not be tolerated and is to cease and desist immediately. To that end, Turtleboy shall immediately remove, and demonstrate such removal to Mr. Genereux's satisfaction, all mentions of, including any inferred references to, Mr. Genereux and PPT from any and all public forums, channels and domains, whether written, electronic, internet, social media, television, print or other media coverage in which Turtleboy, its writers, employees, directors, officers, independent contractors, consultants or other affiliated individuals made false, inaccurate or misleading statements about Mr. Genereux, PPT and missing pet search dogs. This shall include all PPT logos, trademarks or other intellectual property, the use of which was never sought by Turtleboy nor authorized by Mr. Genereux, any posts, comments or replies made about Mr. Genereux or PPT on Turtleboy operated internet or social media properties. Turtleboy shall also refrain going forward from mentioning Mr. Genereux, his work, business or missing pet search dogs in general to anyone involved or inquiring about finding a lost pet or otherwise.

We request a response to this letter no later than 7 days from date of letter. If we do not hear from Turtleboy within this time frame of its sincere and good faith intent to promptly address the issues set out above and to further resolve this matter with appropriate compensation and the identities of the article sources who provided maliciously false information, my client expressly reserves the right to pursue all of the claims that he has under applicable law by commencing suit as described above, including claims for damages and injunctive relief, and nothing is waived or released by virtue of this letter.

' Mr. Aidan T. Kearney November 19, 2018 Page | 6

Please contact me at your earliest convenience to discuss the resolution of this matter.

Very truly yours,

DENICOLA, SELIGSON & UPTON, LLP

Damon M. Seligson

DMS/ Enc.

cc: Mr. Jamie Genereux

EXHIBIT A







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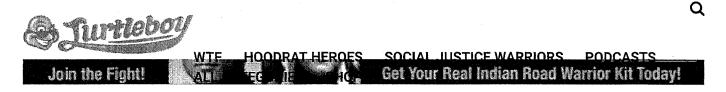
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Manchester Turtlette / August 9, 2018 /

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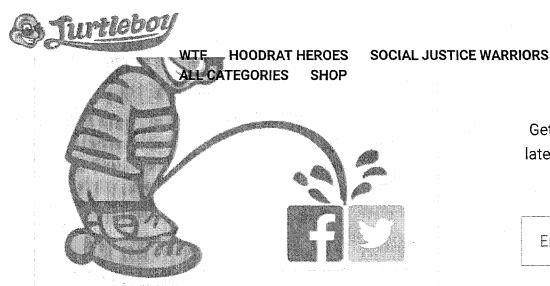
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If you like free speech and want to support what we're doing, feel free to donate to the Turtle fund:

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Email Address



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RIGHT RAIL

OUR PICKS

Hey fam - if you'd like to support Turtleboy and what we

Trump Praises Tiger



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death sentence for most websites, since its much harder all CATEGORIES SHOP to monetize. And we all know the damage Facebook has done. We're never going to stop fighting for free speech, but in the meantime the best way for turtle riders to fight back is to donate to the cause. Without you people none of this is possible. We love you all.

Why Millenials Are Choosing This App to Learn a Language in

Q

As stated yesterday in the announcement of the series, we will be exploring the story that broke open the story behind the story: The Mayo's beloved family dog, Knox. We will also be discussing the "trainer" who had Knox in her care when he died. It's important to note who had trained Amelia as well, as Amelia had no training when she was first hired to be an actual trainer. No certification, no prior experience, nothing. As you will see, this is a reoccurring theme with Off Leash. The woman who trained Amelia is named Becca Hammond who we'll get to later this series. Today we'll be covering the topic of the shady circumstances surrounding Knox's death. You'll see that since there are so many details to this case that there was no other way to expose Off Leash K9 Training,LLC other than in a multiple part series. The time lines have been very well documented, but that doesn't mean it isn't confusing as all get out. The other cases of animal cruelty, missing dogs and deaths all have interesting similarities to

We Must Protect
Judge Kavanaugh's
Nomination, Add Your

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WTF HOODRAT HEROES ALL CATEGORIES SHOP

SOCIAL JUSTICE WARRIORS....PADCASTS...

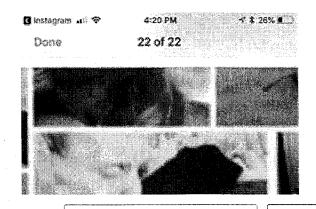
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Amelia Ferreira



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PODCASTS

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On the bright side this shis aspiring rap career.



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The Mayo family sought out the services of Off Leash K9
Training, LLC – Providence because their English Bulldog
Knox was having some behavioral issues mainly
surrounding urination and defecation in the Mayo home.
Obviously this presents a health hazard to the three
children they have, and to Knox himself, so the Mayos
wanted to help their dog to not only learn to do his
business outside, but also it would be in his best interest
to learn discipline. They first contacted Off Leash, who
came highly recommended to the family, in April and was
assigned Amelia Ferreira as their dog trainer. By all
accounts, Amelia came off as a respectable and
knowledgeable trainer from a well respected company.
Had there been any red flags at all, the Mayo family would
never had placed Knox in the care of these people.



mrsmayo51



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It is important to note how these dogs are boarded. You

doggy boarding house facility that the company uses, but that is far from the case. When you send your dogs to be

other dogs being boarded at these private residences with

each other. I have heard that in some cases there have

dangerous for obvious reasons. The Mayos were not

aware that this was how this company operated. We all

home that she owned along with at least 2 other dogs

know now that there were at least 5 dogs living in Amelia's

being "trained" as Amelia's soon-to-be ex-husband Darrell

been ten dogs boarded at the same time with the trainer, not including the dogs owned by the trainer. This presents a safety hazard to all dogs involved and can be incredibly

would think that there would be a kennel situation or

trained by this company, the dogs go to live with the trainer. That would be all fine and good if there weren't

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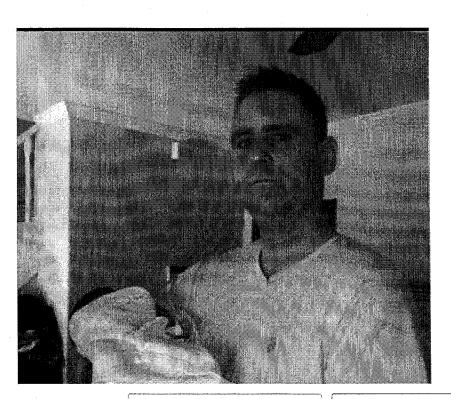
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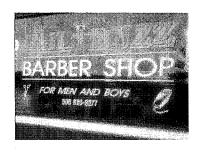


Darrell Ferreira



THE BUZZ BARBERSHOP

PODCASTS



BLACK AND WHITE GRILLE, SPENCER MA



RECENT COMMENTS

Lincolntf on Hartford Hoodbooger Hermorrhoid Gets Arrested After Refusing To Take Off Hood And Leave MGM Grand In Springfield, Whines About Racism, Promotes New Rap Song "Side Bitch"

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(a) Turtleboy

WTF HOODRAT HEROES SOCIAL JUSTICE WARRIORS PODCASTS
videos sent to Chantaline are graph well. When

Racism, Promotes New Rap
Song "Side Bitch"

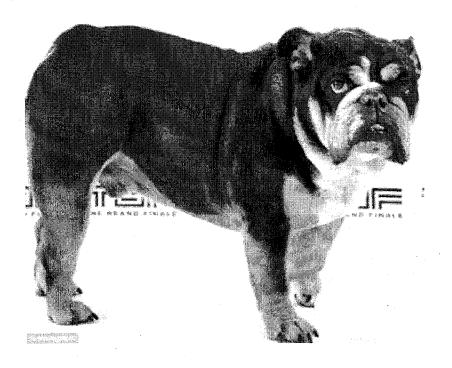
Knox was returned home, he arrived without the charger for the e-collar that he was trained with and without the outline of the training regimen for the Mayo family to continue using at home. Chantel contacted Amelia and arranged for that to be dropped off the next day. That didn't happen. In fact, Amelia didn't decide to provide these things until 10 whole days later with her excuse being that there had been an unspecified family emergency that prevented her from returning texts, phone calls or anything. That's not suspect at all... Anwho, in that time, Knox had been urinating inside the house and to remedy this, Amelia offered a refresher course for Knox. How you can offer a refresher when you really didn't do anything to begin with is beyond me, but that's how it went down. On the 24th of May, Knox went off with Amelia again and that was the last time the Mayo family was to see him alive.

Judge dread on Hartford Hoodbooger Hermorrhoid Gets Arrested After Refusing To Take Off Hood And Leave MGM Grand In Springfield, Whines About Racism, Promotes New Rap Song "Side Bitch"

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ncfoothillbilly on Christine Blasey-Ford Lied About Getting A Second Front Door Because She's Claustrophobic From Alleged Assault, She Was Making An In-Laws Apartment She Rented Out To Google Employees

Randy on Body Language Expert: Christine Blasey-Ford Was Lying And Using The Innocent Little White Girl Routine To Manipulate Senators



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a Turtleboy

taken in an aggressive French Buildog to train. She also Justice warriors claimed that day she had taken knox with her to the Providence Festival, which no one has been able to actually verify. Amelia said that she would provide Chantel with photos when she returned home later that day. When two days had passed without even so much as a text, Chantel Mayo contacted Amelia once again asking if she was still at the Providence festival which only lasts one day, and demanded photos. Another part of Amelia's excuses were her saying that her mother who lives with them had been ill and that Knox was acting as a therapy dog for her, thus why she hadn't had time to really be in touch. How a trainer decides it's OK to use a dog with behavioral issues as a therapy dog for her mother is probably one of the most unprofessional things I've ever heard of. The family was paying for the trainer to train their dog, not use him as a service dog for an ailing stranger. Amelia reassured the Mayo family that Knox was doing well, but had began urinating in the house again. Chantel Mayo told Amelia that she was keeping the mother, who was said to have been in and out of the hospital, in her prayers but wanted Knox to be returned home immediately. She had contacted Amelia's superior and had complained about the lack of communication, a complaint which landed on deaf ears. As the month of June went on, Amelia claimed to have gone to another festival, this time a blues fest with her niece and her dog. That was June 24th, this date is important. By now Amelia is stating that she will bring Knox home on July 3rd and was using the sick mother excuse still, but the Mayos weren't having that and since days had again gone by with shoddy contact said that they would come and get him on June 27th. Amelia stated she understood and that she would bring him home herself the very next day. By 4:17 nm on June

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where they are. Multiple calls and texts well funanswered until 8:17 when Amelia finally answered a phone call from Chantel while hyperventilating and saying Knox ran away at Joe's Rock when they stopped there to pee while on a walk. At this point in time, Chantel called the police to get over to Amelia's location where she was found with Knox's electronic collar in her hands saying that she had found it in the woods although she couldn't tell police exactly where she had found it.



The following day, June 29th Off Leash K9 calls in a company we will be exploring in this series as well by the name of Packleader PetTrackers out of providence, RI. The owner by the name of Jamie Genereux tells another tracker,

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Surtleboy

the pond at Joe's Rock and that some of Kilox's remains are found and that Knox's body had likely sunk to the bottom, strange as the bodies of deceased anything tend to float as gases release that raise them to the top. At this point Amelia was sparingly replying to texts and phone calls, acting cooperatively and saying she was willing to do anything to help find Knox. Whatever the case was, by July 7th the Mayo family had hired a dive team to search for Knox and since this pet tracking company had completely made up the story of Knox drowning, a reoccurring theme that will be explored later, they didn't find anything. At this point in the investigation there is a stand still. That same day, Amelia was pulled over for driving with a suspended license and gave a statement to police when questioned about the whereabouts of Knox. In a surprising turn of events, she admitted to the police that she had never been to Joe's Rock with Knox. So...how did Packleader track Knox all the way out there if this woman never took him out there? Hmmm, that's going to be hard to explain, isn't it? Now, all communication Amelia had been engaged in completely stopped and she began hiding, a very strange thing to do for someone who claimed to be innocent of any wrongdoing. Not a good look, but an even worse look was when on July 13th police who where called for a domestic assault at the Ferreira residence found 5 dogs living in absolutely squalid conditions. They were bumming downstairs in the basement with Amelia's soon-to-be ex-husband with feces piled up on the floor, piss everywhere with the dogs' nails being overgrown and their hair matted. Utterly disgusting shit here, but not as disgusting as Amelia taking this opportunity to try to pin the disappearance of Knox on him. He's a complete animal himself and a tool who abuses women and dogs, but don't claim he did something he didn't do. He can do had all on

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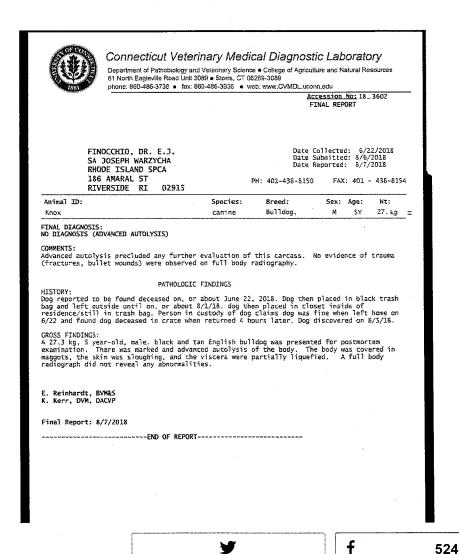
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PODCASTS

S Jurileboy

that on June 22nd, two days before her going to the jazz personal festival, she had found Knox dead in his crate after returning home from training another dog for four hours. Instead of calling someone to tell them what had happened, she elected to take Knox's body outside in a trash bag the following day. She had claimed he had died from natural causes, an astounding conclusion from someone who barely had experience in the field of dog training to be able to determine the cause of death of an animal. The Mayo family had an autopsy preformed and the report was released today, its results being inconclusive:



10/1/2018 12:22 PM

PODCASTS

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& Jurtleboy

be the case. I hat makes you wonder Wity, it she hadnit Justice warriors ALL CATEGORIES SHOP done anything wrong, why would she not tell anyone sooner? Did she have something to hide? Was she ultimately responsible for his death? Should she be charged with animal cruelty in addition to her 4 counts of obstruction of justice? We'll never be able say for certain, although in this series you will come to find that the answer to these may very well just be a resounding "Yes".

We all know that Amelia has a record including things such as possession of drugs, larceny and embezzlement. A lot of people feel that record should include Animal cruelty, as well.

This investigation into Off Leash K9 Training,LLC is not going to be pretty. In fact, it's going to be down right disturbing. You're going to be shown how dogs are mistreated, lost or possibly stolen and how they die. You'll learn how they hire animal abusers with criminal records, some showing past arrests for animal cruelty. We will be showing you how their training methods are deplorable and how a terrified dog isn't a trained dog. The investigation into Packleader PetTrackers is going to be enraging, as you'll come to find that this guy likes to take credit for other people's finds and will readily charge an insane amount of money to produce nothing. You'll be amazed at home many animals "must have drowned" just like Knox, except oftentimes those people don't have the money to hire divers or have their dogs show up weeks later or be found by real dog trackers. We'll also show you what to look for when hiring real dog trainers and trackers, the do's and don't. This will hopefully ensure that your pet is kept safe from these animals, and if they go missing will actually be found. Ultimately, this series will be for the inction of those dags and their families. Stay tuned for nort

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SOCIAL JUSTICE WARRIORS

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Honey Boo Boo Is All Grown Up And Looks Stunning **After Losing Weight**

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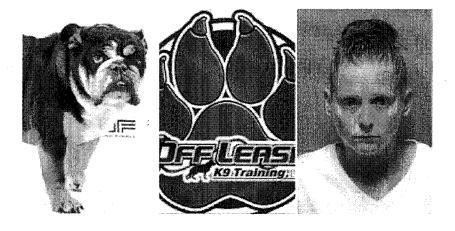
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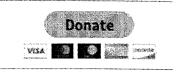
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Woods Emerson to keep up with the hilarious turtle rider commentary.

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campaign now since we've been blacklisted by Google and Facebook, due to the fact that rabid SJWs keep reporting our posts. Getting blacklisted by Google is a death sentence for most websites, since it's much harder to monetize. And we all know the damage Facebook has done. We're never going to stop fighting for free speech, but in the meantime the best way for turtle riders to fight back is to donate to the cause. Without you people none of this is possible. We love you all.

Why Millenials Are Choosing This App to Learn a Language in

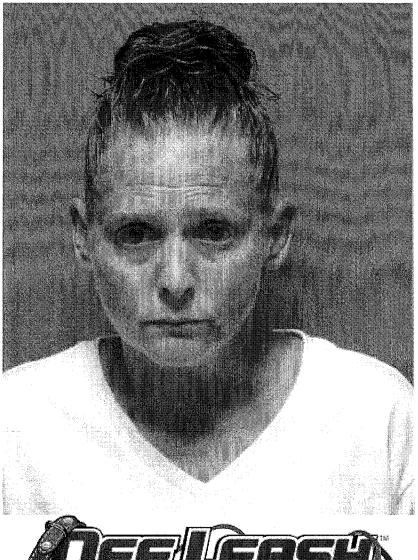
Hey there, turtle riders. As some of you may know by now as there's been some buzz about it, we have launched an investigation into the company that deployed the trainer. Amelia Ferreira, who ended the life of Jerod and Chantel Mayo's dog Knox. As you also know, we've covered that story many times. Well this investigation isn't going to be only exposing how that entire fiasco went down, but also exploring many other cases of animal cruelty, deaths, missing dogs and abuse that has been happening at the hands of trainers employed by this company nation wide. We will also be talking about other companies that have been involved in these cases that have been scam artists offering people hope for finding their beloved dogs and only delivering lies and a hefty bill. We will be picking each and every case apart and getting to the truth surrounding their shady practices and every bit of evil there is going on here, and there's a lot.

We Must Protect
Judge Kavanaugh's
Nomination, Add Your

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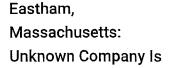
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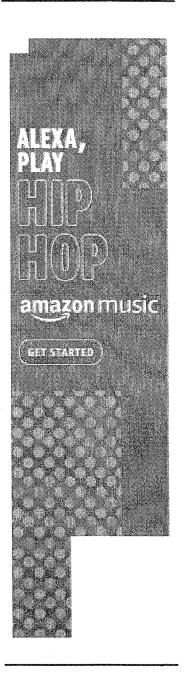


CERSION K9 Training, LLC
"Let the band with your K9 be UNLEASHED"

We've spoken with countless victims to be able to tell their story with the end goal of getting justice for these families and their dogs. We have also been in contact with many other folks who are in the industry of training and pet rescues. Many thanks to those who've shared their stories and also to those who've provided information on how these things are supposed to work. This series will not



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associates, but also educational so that these types of atrocities hopefully never happen again.

Off Leash K9 Training, LLC is a dog training company owned and operated by Nick White with headquarters based in Virginia, here's their website. As you can see on their site, they offer many different packages and types of dog training such as behavioral modification and obedience training and service and/or therapy dog training. We'll be exploring exactly what they mean by that and what methods are used to train their dogs. We will also be showing you how their trainers are trained and what certifications are required (hint: none).

From their about section off their website:

46

About Off Leash K9 Training

Off Leash K9 Training is owned and operated by Nick White. Nick is a former US Marine and former US Secret Service, he currently has over **80+ locations** throughout the United States; however, his HQ is right here in Woodbridge, Va.

Nick is globally recognized as being one of the top dog trainers in the world. He has 2 official world records in off leash obedience, named on Wikipedia as one of the top 20 dog trainers in the world, recently named top 10 trainer in the world by bestdogtrainers.org, has been featured in many magazines and shows, and he is regularly requested by the top celebrities and athletes! He has been called upon by people such as actor Ryan Reynolds, WWE's John Cena, MLB All Star Max Scherzer, UFC World Champion Jon





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Turtleboy Sports about an hour ago

On the bright side this shis aspiring rap career.



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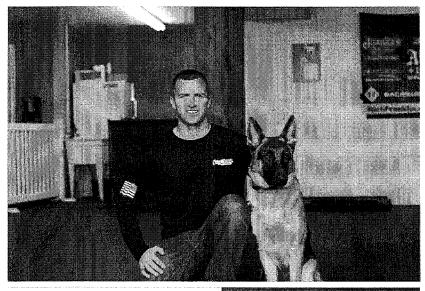
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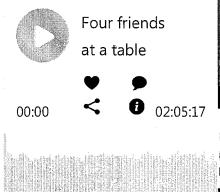
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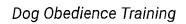
You can visit our YouTube Channel and watch over 1500+ before/after videos of Nick and his team's work! Off Leash K9 Training has more documented videos than any dog training business in the entire world!

Check Out The Dog Show Podcast!

Featuring Nick and Joe, every Friday! Get signed up on Itunes or visit the **Podcast** website for weekly shows! Learn all about the best practices for Dog Training and live a happier life with your furry family members!







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obedience in real world environments; however, we also specialize in behavioral modification, nosework/detection, protection, service and therapy dog certifications, and K9 tracking training! Give your dog the professional dog training he/she needs to be a happy member of your household. Create a more comfortable environment for your family with an obedient dog

You will see in time just how many lies are in the description of this company. In his videos you see obedient, happy and healthy dogs. Also there are many before and after photos of sweet little puppers. What you don't see are the dogs that came home terrified, abused and injured or not at all. You will hear about all of that right here.

I'm not going to lie, this is going to be heartbreaking for many of you. The conditions in which these dogs are kept are deplorable, and the way they are treated is reprehensible. Many of you may place blame on the owners who send their beloved pets to be trained. Well, don't. They were all lied to, duped into believing that this place was taking good care of their animals and many were referred there by their own veterinarians. Having the best interest of their pets in their hearts, they were conned into trusting these people and were betrayed. The guilt they harbor is absolutely unbelievable and my deepest sympathies go out to them.

I don't know how many installments there will be in this series as it seems every day that passes we receive new and disturbing information regarding this place. I do know that we won't stop until the truth about this place and their little buddies is completely exposed and every franchise is

THE BUZZ BARBERSHOP



BLACK AND WHITE GRILLE, SPENCER MA



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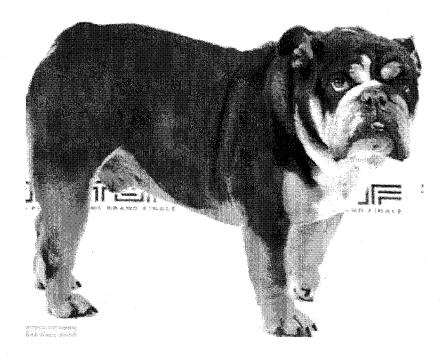
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time is up. If you or anyone you know has had their dog victimized by this company or any affiliate, please contact us and let your voice be heard. Many have come forward with their heart wrenching tales, but to really make the impact need to stop this from continuing others must come forward.

Yes, Knox was the story that broke this rabbit hole of animal abuse wide open, but it didn't end there. Well, it ends now. Stay tuned to see why this company and affiliates must be stopped. Look for the first in the series tomorrow.



Gets Arrested After Refusing To Take Off Hood And Leave MGM Grand In Springfield, Whines About Racism, Promotes New Rap Song "Side Bitch"

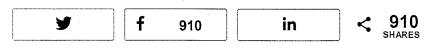
Judge dread on Hartford Hoodbooger Hermorrhoid Gets Arrested After Refusing To Take Off Hood And Leave MGM Grand In Springfield, Whines About Racism, Promotes New Rap Song "Side Bitch"

ncfoothillbilly on Christine Blasey-Ford Lied About Getting A Second Front Door Because She's Claustrophobic From Alleged Assault, She Was Making An In-Laws Apartment She Rented Out To Google Employees

Randy on Body Language Expert: Christine Blasey-Ford Was Lying And Using The Innocent Little White Girl Routine To Manipulate Senators

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EXHIBIT C

Donna Hurley

Saturday, September 22, 2018 11:16 PM



Turtleboy Sports Returns
August 10 at 7:28 PM · 🚱

Part 2 gets way more in depth and into the nitty gritty of Off Leash K9 Training, LLC:





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Exposing Off Leash K9 Training, LLC Part Two: Becca The Beast And Blondie The Beauty, The Only Happy Ending Here



46 Comments 32 Shares



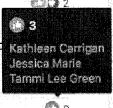


Donna Hurley KARMA is a bitch and can't wait for all d sociopaths to get what is coming to them!

So glad you are investigating Jamie! He's a fraud!

Thank you Turtleboy

Like - Reply - 1w - Edited



Karen Monteiro

Saturday, September 22, 2018 11:16 PM



Jamie Genereux shared a post.
November 30, 2017 - 🔉

I knew this was going to happen.



Rd(Mahoneys Garden Center)

503-209-0105/503-519-9562

www.missingdogsmass.com or visit us on Facebook

Missing Dogs Massachusetts @ added a new photo to the album: 2017 Always

Remembered. November 20, 2017 · 3

Like Page

11/30/17 Very sad news to share from the cape. Chewy was hit by a car and sadiy did not make it. Our prayers are with her family, Thank you to Karen M, Judith W, Stacey G and everyone on the cape who tried to bring her home safely.

11/26/17: Please continue to share Chewy's flyer, as there have been no sightings in the last few days.

Missing Female Poodle/Terrier X - #Osterville MA 11/18/17 Hit by car, possibly injured!

Chewy is 9 yrs/19 lbs, she is White w/ Grey. She is missing from the area of Bluenose Lane/West Barnstable Rd/near Mahoney's Garden Center), She is not familiar with the area! DO NOT CALL or chase. She is possibly injured Call:503-209-0105/503-519-9562



💢 🛴 Anne Masterson Burke and 7 others

35 Comments 699 Shares









Kate Burchell So awful

Like Reply 37w



Jamie Genereux It's a certain death sentence when people do foot searches in the woods surrounded by roads. Karen M thought it was a big joke the other day. I warn't lawabing and hamin which



Anne Coleman Me too. The admin of the page Karen Monteiro kept deleting my suggestions to use Jamie. I even wrote the owners directly to offer to help pay for Jamie's services and they were pigheaded and said no thank you they were working with someone else. That poor dog.

Like · Reply · 37w





Kris Zywocinski What is their aversion to using a successful tracker?? I just don't get it

Like Reply 37w



Kate Burchell Ugh me too, the owner was torn because she isn't from here and they told her that they would not work with her if she went else where.

Like Reply - 37w



Anne Coleman Like you have some kind of exclusive contract?? Ridiculous! Karen criticized me for not being out searching for her with the rest of the dumbies.

Like · Reply · 37w



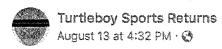
Jamie Genereux Anne Coleman She's the one who lost Lyoness while pet sitting her. And half the reason it took so long to trap her. You can't tell her anything.

Like Reply 37w



Kris Zywocinski Anne Coleman poor owner just wanted her dog back. She was being unfairly bullied into thinking they were the best option. Not sure what I would do if one of my guys was lost and I didn't have some background on successfully finding a dog

Like Reply - 37w



Part 3 of Exposing Off Leash K9 Training LLC: Baloo's story and more:



TURTLEBOYSPORTS.COM

Exposing Off Leash K9 Training LLC Part Three: Former Employees Come Forward, Becca The Beast Fired, And ... Story



29 Comments 17 Shares





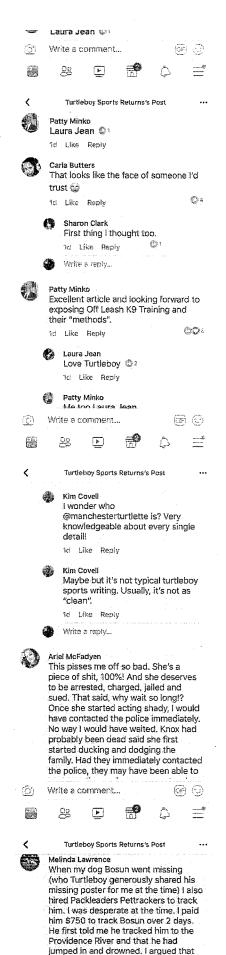






Karen Homer Monteiro When is the article about the scam artist Jamie from Pack Leaders pet tracking coming out? He's such a scam that preys on people desperately looking for their lost pets. He said another persons pet was dead and it walked into a store shortly after. Blows my mind he said Knox drowned in this pond when Knox was never even there to begin with

Like · Reply · 5h



COURT HOLDE THE CASE AS HE DUESH CHAE water and the next day he told me he must have been picked up by someone and was likely used as a bait dog since the people didn't turn him in. I was beyond upset. Luckily he was found a few days later locked in the water treatment facility in Rumford and had been there the whole time. I had brought Jamie and his tracking dogs to t exact spot he was found because ! felt he was there and his dogs "didn't get a hit there". I'm so happy this company is finally being exposed for the fraud it is.

1d Like Reply



Francesca LoPresti Getchell



Write a comment...













Turtleboy Sports Returns's Post



Beth Manton have you seen this about Pet Trackers?!?!

1d Like Reply



Larna James- Grossi Beth Manton have you seen this about Pet Trackers?!?!

1d Like Reply



Mike Pensack

This will be the series that will open the door for turtleboy at the national level. This company has 220 locations across the country. Nothing pulls at the heartstrings more than rampant animal

1d Like Reply



Eileen Neary

Absolutely and utterly horrifying. Beyond belief. I can't imagine the poor Mayo family's pain... especially the kids who lost a best friend. Breaks my heart.

1d Like Reply



Boh Garrigan



Write a comment...





















** Verizon LTE





respect one joy ency comig to do n seems as though they should be allowed to live longer than they do, but to have a beloved pet's life (especially when so many animals do not have the love Knox did) ended so soon is just screaming for ANY type of justice

2d Like Reply



Crystal Lanier Mathews Blessings to you for what you are doing

2d Like Reply



Dan Walker

Hove you guys! Keep it up. You're the only real news out there!

2d Like Reply



Cody Hyphen James Larna James- Grossi

01 2d Like Reply



Macalla Barry

Can't wait for this!!

2d Like Reply

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Write a comment...



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