

IN THE COUNTY COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

MICHAEL ALEXANDROU,

CASE NO.:

Plaintiff,

v.

AMKA BROADCAST NETWORK, INC.,  
and ANGELO AGELATOS, Individually

Defendants.

\_\_\_\_\_ /

**COMPLAINT**

Plaintiff, Michael Alexandrou (“Alexandrou” or “Plaintiff”), by and through undersigned counsel, sue Defendants, Angelo Angelatos (“Angelatos”) and AMKA Broadcast Network, Inc. (“AMKA”), and state as follows.

**JURISDICTION & VENUE**

1. This is an action in excess of \$30,000.00, exclusive of costs, interest, and attorney fees, and is otherwise within the jurisdiction of the Court.
2. Angelatos is a Florida resident with a permanent address located in New Port Richey, Florida, which is located in Pasco County, Florida.
3. Alexandrou is a Florida resident with a permanent address located in New Port Richey, Florida, which is located in Pasco County, Florida.
4. AKMA is a Florida business which is headquartered in Clearwater, Florida.
5. Jurisdiction over both Plaintiff and Defendants exists because the cause of action accrued in Pasco County, Florida.
6. Venue exists because both Plaintiff and Defendants are residents of Pasco County, Florida.

7. Alexandrou has performed or satisfied all conditions precedent to recovery against Defendants, or in the alternative, all conditions precedent has been waived or otherwise excused.

### **COUNT I – DEFAMATION**

8. This is an action against Mr. Angelatos and AMKA for damages in an amount to be shown at trial, exclusive of interests, costs, and attorney's fees for defaming Alexandrou.
9. Plaintiff restates and realleges paragraphs 1 – 7 and incorporates them as fully set forth herein.
10. Angelatos has made and continues to make and publish false and defamatory statements of and concerning Alexandrou.
11. Said defamatory statements have been published through various channels of communication at the control and discretion of Angelatos and AKMA.
12. These channels of communication include, but are not limited to, Defendants' radio show *Greek Voice Live*, broadcast on AKMA owned radio station WPSO 1500 AM and on the YouTube channels InfoEuro TV at <https://www.youtube.com/channel/UCMrxqMdezMsF76D4x8iRPyg> and Greek Voice TV at <https://www.youtube.com/c/GreekVoiceTV>.
13. These false statements were published with malice.
14. Angelatos published these statements with malice because he has opposing political views than Alexandrou and seeks to have his reputations ruined.
15. Angelatos is a known political radio host and is known for often spreading misinformation and other false material.

16. AMKA is the broadcasting network that Angelatos operates under when he made and continues to make defamatory statements against Alexandrou.
17. The statements made by Angelatos are false, fabricated, and untruthful.
18. These statements made by Angelatos, which are of and concerning Alexandrou, include, but are not limited to:
  - a. “The President [Alexandrou] is a fraud, a liar, a thief, and a manipulator.”
  - b. “You [Alexandrou] took \$2,500.00 from Vasilis Mataragas and you never returned it.”
  - c. “... [P]lease note that we are going to reveal more dirty tricks of these gentlemen [Alexandrou and the Panhellenic Federation of Florida] who have taken more money and this time with proof...”
19. Angelatos and AMKA have published these statements to third parties, typically in the form of their radio show listeners.
20. *Greek Voice Live* airs in the Greek language and can only be understood by Greek-speaking listeners. However, *Greek Voice Live* is broadcasted in and around Tarpon Springs, Florida. Tarpon Springs is a city with the highest Greek population in the entire United States.
21. These statements have damaged Alexandrou’s reputation because the statements have injured Alexandrou’s political stature among the Greek community in northern Pinellas County.
22. Angelatos and AKMA’s statements were made intentionally, knowingly, and maliciously to third parties; made without reasonable care as to the truth or falsity of those statements; made to inflict damage and/or financial loss to Plaintiff; made to

tarnish Plaintiff's reputation and businesses; and made to damage Plaintiff's potential future business and political relationships.

23. Alexandrou's reputation, political stature, and businesses have been injured and suffered damages and/or financial loss, including, without limitation, economic, non-economic, and special damages as a result of as a result of these statements made by Angelatos.

**WHEREFORE**, Plaintiff Michael Alexandrou, respectfully requests that this Honorable Court:

- A) Award Alexandrou all compensatory damages, including consequential and incidental damages as a result of Defendants' wrongdoing in an amount to be determined at trial;
- B) Award attorney's fees and costs to Alexandrou;
- C) Requiring Angelatos and AMKA to make a public retraction of all false statements;
- D) Granting preliminary and permanent injunctive relief to prevent Angelatos and AMKA from making any further defamatory remarks; and
- E) Any further relief this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff respectfully demands a trial by jury of all issues so triable.

Dated: April 18, 2022.

RESPECTFULLY SUBMITTED,

*/s/ April S. Goodwin*  
APRIL S. GOODWIN, ESQ.  
FLORIDA BAR NO: 0502537  
ANDREW J. SILVERS, ESQ.  
FLORIDA BAR NO. 1033222  
The Goodwin Firm

801 West Bay Drive, Suite 715  
Largo, FL 33770  
Attorneys for Plaintiff  
(727) 316.5333  
[april@goodwin-firm.com](mailto:april@goodwin-firm.com)  
[andrew@goodwin-firm.com](mailto:andrew@goodwin-firm.com)  
[info@goodwin-firm.com](mailto:info@goodwin-firm.com)