

In the matter of SCOTTON & ZACCAGNINO vs. METRÓPOLES COMUNICAÇÃO S.A.,
GRUPO ESTADO (ESTADÃO), GRUPO FOLHA (FOLHA DE SÃO PAULO), PODER360
JORNALISMO E COMUNICAÇÃO LTDA
MOTION FOR PREMPTIVE DETERMINATION OF JURISDICTION

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(WEST PALM BEACH DIVISION)**

**ROGERIO SCOTTON,
PETER ZACCAGNINO (U.S. citizen),
Owners of Legal Help 4 You LLC,**

CASE NO:

Plaintiff,

vs.

**METRÓPOLES COMUNICAÇÃO S.A.,
GRUPO ESTADO (ESTADÃO),
GRUPO FOLHA (FOLHA DE SÃO PAULO),
PODER360 JORNALISMO E COMUNICAÇÃO LTDA.,
Defendant.**

**MOTION FOR PREMPTIVE DETERMINATION OF
JURISDICTION**

COMES NOW, the Plaintiffs, Rogerio Scotton and Peter Zaccagnino, appearing pro se, and respectfully request this Honorable Court to issue a Preemptive Determination of Jurisdiction, confirming that this Court properly holds subject

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matter jurisdiction, personal jurisdiction, and territorial authority over all foreign defendants named herein.

This motion is necessitated by the anticipated procedural tactics of the Defendants—foreign news media entities engaged in coordinated disinformation campaigns against U.S. citizens and a Florida-based company—who are expected to assert lack of jurisdiction, forum non conveniens, or foreign sovereign protection in an attempt to avoid liability.

I. FEDERAL QUESTION AND STATUTORY BASIS FOR JURISDICTION

This Court has jurisdiction under:

28 U.S.C. § 1331 – Federal Question

28 U.S.C. § 1332 – Diversity Jurisdiction (amount in controversy exceeds \$75,000)

18 U.S.C. §§ 1961–1964 – Civil RICO

28 U.S.C. § 4101 – Defamation under foreign law

28 U.S.C. § 1367 – Supplemental jurisdiction over state and common law claims

Venue is proper under 28 U.S.C. § 1391(b)(2) and (c)(3), as:

Plaintiffs reside in this District;

Defendants’ defamatory conduct caused harm within this District;

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U.S.-based digital infrastructure (Meta, X, Google, AWS) was used to publish and distribute the defamatory content.

II. SPECIFIC BASES FOR U.S. JURISDICTION OVER FOREIGN DEFENDANTS

All Defendants intentionally used U.S.-based digital platforms to disseminate false information, targeting U.S. readers and entities.

Their publications interfered with ongoing federal litigation in this District (including Trump Media & Technology Group Corp. et al. v. Alexandre de Moraes). Defendants' conduct directly harmed a U.S. citizen (Zaccagnino), a Florida-based business (Legal Help 4 You LLC), and a resident (Scotton).

As established in *Calder v. Jones*, 465 U.S. 783 (1984), purposeful targeting of plaintiffs in the U.S. gives rise to personal jurisdiction even for foreign actors.

Their coordinated disinformation effort constitutes journalistic terrorism, a form of transnational repression condemned by both U.S. statutes and international human rights norms.

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III. LINK TO NATIONAL SECURITY & TRUMP AMICUS MOTION

This lawsuit stems directly from Plaintiffs' constitutionally protected Amicus Curiae brief in support of Donald Trump and Rumble against Alexandre de Moraes (Southern District of Florida, Case No. 9:24-cv-80710). That brief sought U.S. accountability for foreign judicial repression and digital censorship.

The Brazilian Defendants:

Intentionally misrepresented Plaintiffs' role in the Trump case;

Disseminated false allegations (including claims of FBI investigation, and fraud involving Apple, Walmart, and Target);

Used defamatory content to distract from the Merits of the Amicus, resulting in real obstruction of justice;

Conspired across media channels, echoing a coordinated smear tactic.

This Court is entitled to exercise equitable jurisdiction to prevent abuse of its authority and protect the integrity of the judiciary from coordinated foreign interference.

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IV. PRAYER FOR RELIEF

Plaintiffs respectfully request that this Honorable Court:

Affirm subject matter and personal jurisdiction over all named Defendants;

Acknowledge that Defendants' use of U.S. digital infrastructure and targeting of U.S. parties invokes jurisdiction under both traditional and digital sovereignty principles;


Deny any anticipated motion to dismiss based on jurisdictional grounds, forum non conveniens, or foreign actor immunity;

Refer the jurisdictional facts to the Department of Justice under:

22 U.S.C. § 2656 – Transnational Repression

18 U.S.C. § 1343 – Wire Fraud

18 U.S.C. § 1956 – Money Laundering


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of August, 2025, a true and correct copy of the foregoing was served via electronic mail (email) upon the following Defendants, pursuant to Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure and applicable international notice protocols:

Defendant: Metrôpoles Comunicação S.A.

Address: SCN Quadra 04, Bloco B S/N, Sala 1302 Parte A, Asa Norte, Brasília – DF, CEP 70714-900, Brazil

Email: contato@metropoles.com | redacao@metropoles.com

To the attention of: Natalia Paiva, Editor-in-Chief

Defendant: Grupo Estado (Estadão)

Address: Av. Eng. Caetano Álvares, 55, São Paulo – SP, CEP 02546-000, Brazil

Email: contato@estadao.com | juliano.galisi@estadao.com

To the attention of: Juliano Galisi, Reporter

Defendant: Grupo Folha (Folha de São Paulo)

Address: Alameda Barão de Limeira, 425, Campos Elíseos, São Paulo – SP, CEP 01202-900, Brazil

Email: ombudsman@grupofolha.com.br | redacao@grupofolha.com.br

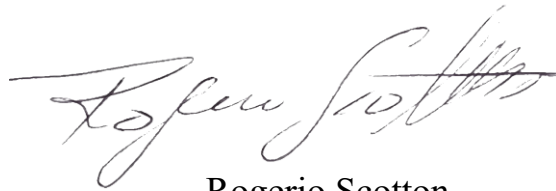
To the attention of: Editorial Department

Defendant: Poder360 Jornalismo e Comunicação Ltda

Address: SHTN Trecho 1, Conj. 1B, Bloco C, sala 103, Brasília – DF, CEP 70701-100, Brazil

Email: redacao@poder360.com.br | contato@poder360.com.br

To the attention of: Editorial and Legal Departments



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