PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER AGENCIES FOR CRIMINAL AND CIVIL REVIEW

# 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.

PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER AGENCIES FOR CRIMINAL AND CIVIL REVIEW

Plaintiffs Rogerio Scotton and Peter Zaccagnino respectfully move this Honorable Court to refer this action to the United States Department of Justice (DOJ), Federal

JORNALISMO E COMUNICAÇÃO LTDA

PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER AGENCIES FOR CRIMINAL AND CIVIL REVIEW

Bureau of Investigation (FBI), Office of Foreign Assets Control (OFAC), and other appropriate federal agencies for criminal and civil investigation and review, pursuant to statutory authority and the Court's inherent power to preserve the integrity of U.S.

#### I. INTRODUCTION

judicial proceedings.

This action arises from a coordinated campaign of defamation, disinformation, and transnational repression by Brazilian media conglomerates who used U.S.-based digital platforms to target U.S. residents, a Florida-registered business (Legal Help 4 You LLC), and to obstruct litigation involving constitutional matters pending before this Court. The campaign sought to falsely portray Plaintiff Rogerio Scotton as a criminal under FBI investigation and fabricate fraud allegations involving major U.S. companies, including Apple, Walmart, and Target — none of which have confirmed any such claim. The publications appear to have been deployed shortly after Plaintiffs filed an amicus curiae motion in a separate federal case, Trump Media & Technology Group v. Alexandre de Moraes, calling for Magnitsky sanctions against a foreign official for alleged transnational repression.

PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER AGENCIES FOR CRIMINAL AND CIVIL REVIEW

Plaintiffs believe there is probable cause to suspect that these Defendants are receiving financial support from Brazilian public actors and/or functioning as unregistered foreign agents, in violation of multiple U.S. laws.

#### II. BASIS FOR REFERRAL

Plaintiffs respectfully request that the Court refer this matter for DOJ review pursuant to the following legal grounds:

18 U.S.C. § 1343 – Wire Fraud

Use of U.S.-based platforms (Meta, Google, YouTube, X/Twitter) to transmit knowingly false statements that caused reputational and financial harm to Plaintiffs.

18 U.S.C. §§ 1956, 1957 – Money Laundering

Suspicion of illicit or politically motivated financial transfers from Brazilian sources (including Justice Alexandre de Moraes or related entities) to support malicious reporting campaigns.

22 U.S.C. § 611 et seq. – Foreign Agents Registration Act (FARA)

Defendants may be functioning as unregistered foreign agents acting at the behest of Brazilian authorities to interfere in U.S. legal and political processes.

JORNALISMO E COMUNICAÇÃO LTDA

PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER

AGENCIES FOR CRIMINAL AND CIVIL REVIEW

Global Magnitsky Human Rights Accountability Act (22 U.S.C. § 2656 note)

The Defendants have engaged in coordinated acts of transnational repression —

including defamation, media manipulation, and attempts to discredit whistleblowers

and petitioners in U.S. courts — which could support sanction proceedings under

the Act.

18 U.S.C. § 1503 – Obstruction of Justice

Defendants' coordinated effort to discredit and harm Plaintiffs following the filing

of an amicus brief in a federal case involving Justice de Moraes suggests intentional

interference with a judicial process.

USA PATRIOT Act, 18 U.S.C. § 3486

The Court may request the DOJ to issue subpoenas for records related to financial

transactions or communication networks used by the Defendants in the

dissemination of the false information.

4

JORNALISMO E COMUNICAÇÃO LTDA

PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER

AGENCIES FOR CRIMINAL AND CIVIL REVIEW

III. FACTUAL SUPPORT

Defendants published and amplified articles falsely stating that Plaintiff Scotton is

"under FBI investigation" for fraud.

The articles claimed he defrauded Apple, Walmart, and Target — companies which

have since denied any such fraud complaints or investigations.

Defendant Giuliano Galisi, a reporter for Estadão, contacted Plaintiffs under false

pretenses and disregarded the facts provided, misrepresenting them in his

publication.

These publications circulated on Meta, YouTube, and X — reaching U.S. audiences,

harming Plaintiffs' reputations, and jeopardizing business operations of Legal Help

4 You LLC, a Florida company.

The content also sought to undermine a legitimate federal amicus motion submitted

in a case involving U.S. constitutional rights and international human rights law.

IV. REQUEST FOR INVESTIGATION

Plaintiffs respectfully ask that this Court refer this matter to the United States

Department of Justice, FBI, and OFAC, and authorize those agencies to:

5

JORNALISMO E COMUNICAÇÃO LTDA

PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER

AGENCIES FOR CRIMINAL AND CIVIL REVIEW

Subpoena financial records and contracts of Defendants to determine whether they

are funded or coordinated by foreign political interests;

Investigate whether Defendants are operating as unregistered foreign agents, as

defined by FARA;

Determine whether these acts amount to wire fraud, laundering of politically directed

funds, or interference with U.S. courts;

Consider the publication of false information targeting whistleblowers and court

petitioners as an act of transnational repression and/or journalistic terrorism;

Assess whether any Defendant entity should be sanctioned under the Global

Magnitsky Act.

V. CONCLUSION

Plaintiffs have provided factual allegations and documentation sufficient to support

reasonable suspicion of criminal conduct and interference with U.S. institutions. The

Court's referral is essential to ensure that U.S. judicial proceedings remain free from

foreign manipulation, to protect the civil rights of U.S. residents, and to prevent the

continued misuse of American media infrastructure for disinformation purposes.

6

PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER AGENCIES FOR CRIMINAL AND CIVIL REVIEW

WHEREFORE, Plaintiffs respectfully request that this Court:

GRANT this Motion and

REFER this matter to the DOJ, FBI, OFAC, and other agencies as outlined above.

Respectfully submitted,

Rogerio Scotton
160 W Camino Real # 102

Boca Raton, FL 33432

info@legalhelp4y.com

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9th day of August 2025, a true and correct copy of the foregoing PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER AGENCIES FOR CRIMINAL AND CIVIL REVIEW 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: Metrópoles 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

### PLAINTIFFS' MOTION FOR REFERRAL TO THE U.S. DEPARTMENT OF JUSTICE AND OTHER AGENCIES FOR CRIMINAL AND CIVIL REVIEW

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

Rogerio Scotton

160 W Camino Real # 102

Boca Raton, FL 33432

info@legalhlep4y.com