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September 25, 2017

REDACTED
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By Express Mail

Re: Civil Theft from Perla Group International, Inc. and Charles D'Alberto

Dear **REDACTED**:

Kindly be advised that this office represents Perla Group International, Inc. and Charles D'Alberto.

Pursuant to Florida Statutes, Section 772.11, Civil Remedies for Criminal Practices, demand is hereby being made for damages under this statute in the treble damage amount.

As Perla Group International, Inc. is a corporation located in Florida, and you have directed your communications into the State of Florida jurisdiction lies in Florida.

Under this statute, you have 30 days from the receipt of this letter demand to comply with this demand and be given a written release from further civil liability for the specific acts of theft or exploitation covered herein.

The criminal practices covered in this statute include criminal activity which means to commit, to attempt to commit, to conspire to commit, or to solicit, coerce, or intimidate another person to commit any crime that is chargeable by indictment or information under the following provisions:

Chapter 517, relating to securities transactions.

Chapter 812, relating to theft, robbery, and related crimes.

Chapter 815, relating to computer-related crimes.

Chapter 817, relating to fraudulent practices, false pretenses, fraud generally, and credit card crimes.

You have engaged in a deliberate, willful, malicious, and continuous campaign to destroy Perla Group International, Inc. and Mr. D'Alberto using various wrongful and illegal means.

These wrongful and illegal means include, but are not limited to defamation, interfering with business relations, stalking, harassment, fraud, obstruction of justice and other wrongful, tortuous, unlawful and illegal means.

These actions by you cost Perla Group International, Inc., among other damages, many of millions of dollars in lost business, lost stock market value, loss of reputation, and loss of damages in court proceedings, along with personal damages from deliberate infliction of emotional distress, stalking, threats to personal safety, damage to reputation, and other harm.

You have spent a huge amount of time over a period of years to disrupt, defame and destroy Perla Group International, Inc. and Mr. D'Alberto by any means possible legal and illegal including, but not limited to, defamation, fraud, interference with business relations, stealing evidence, bribing employees, and, constant stalking and harassment, costing Perla Group International, Inc. and Mr. D'Alberto more than \$50 million in lost business and actual damages in addition to damage to reputation.

Summary of the Facts

You have damaged Perla Group International, Inc. and Charles D'Alberto repeatedly by numerous criminal acts of fraud, cyberstalking, defamation and interference with business relations, among others.

Fraud

You have caused to be posted on Internet countless defamatory statements. These statements contain so many falsehoods that a full documentation of their lies would take a very long time. Suffice it to say that you are well aware of your defamation and frauds.

Years ago you started on an unrelenting, malicious and criminal campaign to destroy

Perla Group International, Inc. and Charles D'Alberto. Your actions included but were not limited to, the following:

Posting false information about the Perla Group International, Inc. and it's CEO on 100's of occasions on InvestorsHub.com.

Interfering business relations with prospective clients by means of fraudulent statements.

Your efforts over the years to destroy Perla Group International, Inc. are beyond count. Your fraud and defamation has resulted in many millions in lost contracts for which you will now be brought to account.

By means of fraud, you have interfered with Perla Group International, Inc.'s business relations.

As you may be aware the law of fraud contains the following elements: a misstatement of material fact made with scienter that is reasonably relied upon and damages.

In your case, you have deliberately made hundreds if not thousands of fraudulent statements that caused damages to our clients from lost stock market value, lost business, and more.

You continue in this criminal and malicious course of conduct.

We now direct you to fixate your attention on the following laws:

Cyberstalking

Florida Statute 784.048 Stalking; definitions; penalties.—

(1) As used in this section, the term:

(a) "Harass" means to engage in a course of conduct directed at a specific person which causes substantial emotional distress to that person and serves no legitimate purpose.

(b) "Course of conduct" means a pattern of conduct composed of a series of acts over a period of time, however short, which evidences a continuity of purpose. The term does not include constitutionally protected activity such as picketing or other organized protests.

(c) "Credible threat" means a verbal or nonverbal threat, or a combination of the two, including threats delivered by electronic communication or implied by a pattern of conduct, which places the person who is the target of the threat in reasonable fear for his or her safety or the safety of his or her family members or individuals closely associated

with the person, and which is made with the apparent ability to carry out the threat to cause such harm. It is not necessary to prove that the person making the threat had the intent to actually carry out the threat. The present incarceration of the person making the threat is not a bar to prosecution under this section.

(d) "Cyberstalk" means to engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, directed at a specific person, causing substantial emotional distress to that person and serving no legitimate purpose.

(2) A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person commits the offense of stalking, a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

....

(8) The punishment imposed under this section shall run consecutive to any former sentence imposed for a conviction for any offense under s. 794.011, s. 800.04, or s. 847.0135(5).

(9)(a) The sentencing court shall consider, as a part of any sentence, issuing an order restraining the you from any contact with the victim, which may be valid for up to 10 years, as determined by the court. It is the intent of the Legislature that the length of any such order be based upon the seriousness of the facts before the court, the probability of future violations by the perpetrator, and the safety of the victim and his or her family members or individuals closely associated with the victim.

(b) The order may be issued by the court even if the you is sentenced to a state prison or a county jail or even if the imposition of the sentence is suspended and the you is placed on probation. [emphasis added]

Securities Fraud, including 10b-5

Further, as your efforts involved fraud concerning securities and you have made numerous attempts to depress the price of Perla Group International, Inc. stock using fraud, your actions violate numerous state and federal securities laws, including SEC Rule 10b-5 and the Florida securities laws.

PARTIES

Charles D'Alberto is a resident of the State of Florida.

Perla Group International, Inc. is a corporation which currently maintains offices at 4737 N. Ocean Drive, Fort Lauderdale, FL 33308. Mr. D'Alberto is the President of Perla Group International, Inc.

You reside at **REDACTED**.

JURISDICTION

Jurisdiction naturally lies in Florida as all of the parties reside there. Further, the Florida Long-Arm Statute Fla. Stat. § 48.193 § 48.193. Acts subjecting person to jurisdiction of courts of this state:

(1) Any person, whether or not a citizen or resident of this state, who personally or through an agent does any of the acts enumerated in this subsection thereby submits himself or herself and, if he or she is a natural person, his or her personal representative to the jurisdiction of the courts of this state for any cause of action arising from the doing of any of the following acts: (a) Operating, conducting, engaging in, or carrying on a business or business venture in this state or having an office or agency in this state. (b) Committing a tortious act within this state. . . . (2) A you who is engaged in substantial and not isolated activity within this state, whether such activity is wholly interstate, intrastate, or otherwise, is subject to the jurisdiction of the courts of this state, whether or not the claim arises from that activity.

Florida has jurisdiction by virtue of Florida's long arm statute which expands jurisdiction over out-of-state persons or businesses that have sufficient contact with Florida, Florida Statutes, Section 48.193 Acts subjecting person to jurisdiction of courts of state. You have purposefully availed yourself of the privilege of conducting activities in the State of Florida, You knew that your communication would enter the State of Florida and be received by its residents; your communications were directed at the State and the exercise of personal jurisdiction would be constitutionally reasonable. you have availed yourself the privilege of conducting activities in Florida and had sufficient contact with Florida to evoke jurisdiction.

STATEMENT OF THE FACTS

You have repeatedly over a period of years posted false and defamatory statements on

locations such as InvestorsHub.com which contain defamatory statements injuring Perla Group International, Inc. and Mr. D'Alberto. Perla Group International, Inc. and Mr. D'Alberto are engaged in developing a business requiring tens of millions of dollars in financing, obtaining customers which can give the Perla Group International, Inc. many tens of millions revenues and capable of generating tens of millions in revenues and profits. These defamatory statements cost Perla Group International, Inc. tens of millions in revenues from customers and in financing.

You continue these activities with said statements against Perla Group International, Inc. and Mr. D'Alberto.

In making such defamation, you violated Florida Statutes making it a misdemeanor to make malicious use of electronic communication to harass after receiving reasonable warning or request to stop.

Over the years of your tortuous conduct, you frequently and repeatedly made a large number of defamatory statements.

When the you made these statements and representations you knew them to be false, and these statements and representations were made by you with the intent to harm my clients.

Continuing Course of Wrongful Conduct

You have engaged over a period of years, and continue to engage, in a scheme to defame, defraud, and otherwise injure Perla Group International, Inc. and Mr. D'Alberto. Your scheme entailed a systematic, unrelenting, continuous, ongoing course of conduct using the same type of wrongful conduct with the same intention. The ongoing elements and tortuous acts of this scheme continue unabated to this day, despite several attempts by Perla Group International, Inc. and Mr. D'Alberto to get you to cease and desist.

Your conspiracy was a continuing, unrelenting, continuous scheme, much more than a pattern of illegal conduct, as it was a continuous, uninterrupted offense because your actions to harm Perla Group International, Inc. and Mr. D'Alberto in this case were continued over time down to the present day with every sign that you intend to continue your wrongful acts, consisting of the same elements and the same techniques of harm, focusing only on the same two victims with you having the single continuing intention of destroying Perla Group International, Inc.

Florida civil law provides as follows regarding libel:

*Florida Libel --CHAPTER 770 --CIVIL
ACTIONS FOR LIBEL*

770.1 Notice condition precedent to action or prosecution for libel or slander.-Before any civil action is brought for publication or broadcast, in a newspaper, periodical, or other medium, of a libel or slander, the my clients shall, at least 5 days before instituting such action, serve notice in writing on the you, specifying the article or broadcast and the statements therein which he or she alleges to be false and defamatory.

770.2 Correction, apology, or retraction by newspaper or broadcast station.-

1) If it appears upon the trial that said article or broadcast was published in good faith; that its falsity was due to an honest mistake of the facts; that there were reasonable grounds for believing that the statements in said article or broadcast were true; and that, within the period of time specified in subsection (2), a full and fair correction, apology, or retraction was, in the case of a newspaper or periodical, published in the same editions or corresponding issues of the newspaper or periodical in which said article appeared and in as conspicuous place and type as said original article or, in the case of a broadcast, the correction, apology, or retraction was broadcast at a comparable time, then the my clients in such case shall recover only actual damages.

(2) Full and fair correction, apology, or retraction shall be made:

(a) In the case of a broadcast or a daily or weekly newspaper or periodical, within 10 days after service of notice;

(b) In the case of a newspaper or periodical published semimonthly, within 20 days after service of notice;

(c) In the case of a newspaper or periodical published monthly, within 45 days after service of notice; and

(d) In the case of a newspaper or periodical published less frequently than monthly, in the next issue,

provided notice is served no later than 45 days prior to such publication.

770.3 Civil liability of broadcasting stations.--The owner, lessee, licensee, or operator of a broadcasting station shall have the right, except when prohibited by federal law or regulation, but shall not be compelled, to require the submission of a written copy of any statement intended to be broadcast over such station 24 hours before the time of the intended broadcast thereof. When such owner, lessee, licensee, or operator has so required the submission of such copy, such owner, lessee, licensee, or operator shall not be liable in damages for any libelous or slanderous utterance made by or for the person or party submitting a copy of such proposed broadcast which is not contained in such copy. This section shall not be construed to relieve the person or party or the agents or servants of such person or party making any such libelous or slanderous utterance from liability therefor.

770.4 Civil liability of radio or television broadcasting stations; care to prevent publication or utterance required.--The owner, licensee, or operator of a radio or television broadcasting station, and the agents or employees of any such owner, licensee or operator, shall not be liable for any damages for any defamatory statement published or uttered in or as a part of a radio or television broadcast, by one other than such owner, licensee or operator, or general agent or employees thereof, unless it shall be alleged and proved by the complaining party, that such owner, licensee, operator, general agent or employee, has failed to exercise due care to prevent the publication or utterance of such statement in such broadcasts, provided, however, the exercise of due care shall be construed to include the bona fide compliance with any federal law or the regulation of any federal regulatory agency.

770.5 Limitation of choice of venue.--No person shall have more than one choice of venue for damages for libel or slander; invasion of privacy, or any other tort founded upon any single publication, exhibition, or utterance, such as any one edition of a newspaper, book, or magazine, any one presentation to an audience, any one broadcast over radio or television, or any one exhibition of a motion picture. Recovery in any action shall include all damages for any such tort suffered by the my clients in all jurisdictions.

770.6 Adverse judgment in any jurisdiction a bar

to additional action.--A judgment in any jurisdiction for or against the my clients upon the substantive merits of any action for damages founded upon a single publication or exhibition or utterance as described in s. 770.05 shall bar any other action for damages by the same my clients against the same you founded upon the same publication or exhibition or utterance.

770.7 Cause of action, time of accrual.--The cause of action for damages founded upon a single publication or exhibition or utterance, as described in s. 770.05, shall be deemed to have accrued at the time of the first publication or exhibition or utterance thereof in this state.

770.8 Limitation on recovery of damages.--No person shall have more than one choice of venue for damages for libel founded upon a single publication or exhibition or utterance, as described in s. 770.05, and upon his or her election in any one of his or her choices of venue, then the person shall be bound to recover there all damages allowed him or her.

Under Florida law, the elements of a defamation claim are:

You published a false statement;

about my clients;

to a third party; and

the falsity of the statement caused injury to my clients.

You had no privileges attaching to your communication.

You were communicating with malice.

My clients were not public figures.

Your statements posted on the relevant websites are defamatory per se.

You published or caused these defamatory statements to be published by posting said statements on various websites.

You also caused such statements to be posted on InvestorsHub.com, a chat website for investors.

Your false and defamatory statements were of and concerning Perla Group International, Inc. and Mr. D'Alberto, and contained the false statements that they stole and defrauded people out of money.

Your false and defamatory statements were published with the intent to harm Perla Group International, Inc. and Mr. D'Alberto' good names, reputations and business by falsely accusing Perla Group International, Inc. and Mr. D'Alberto of criminal acts.

You published these false and defamatory statements with actual malice and knowledge that the statements were false, or with reckless disregard of whether they were false or not.

You continue to engage in the publication of further defamatory statements.

Since their posting, the false and defamatory statements published by you regarding Perla Group International, Inc. and Mr. D'Alberto have remained available to millions of Internet users, including those in the State of Florida, many of whom may have made copies of the false and defamatory statements and/or distributed them by electronic mail or other means and/or re-posted them to other blogs, Internet forums, and message boards, and Perla Group International, Inc. and Mr. D'Alberto have no means of removing these false and defamatory statements from the Internet.

In carrying out the aforementioned conduct, you acted negligently, willfully, maliciously, and/or with reckless indifference to the consequences of your actions against Perla Group International, Inc. and Mr. D'Alberto.

As a direct and proximate result of your intentional and malicious publication of false and defamatory statements, Perla Group International, Inc. and Mr. D'Alberto have been and will continue to be damaged and injured in their respective characters, reputations and business.

Perla Group International, Inc. and Mr. D'Alberto are and were all the more damaged since anyone making a search on the Internet for “Charles D'Alberto” or “Perla Group International, Inc.” is likely to have the your defamation on the first page of the search results.

Actual Malice

You knew that your statements about the Perla Group International, Inc. and Mr. D'Alberto were false.

Your continuing conduct amply provides clear and convincing evidence that the you actually knew the information she published was false. This conduct provides incontrovertible evidence that your state of mind at the time of publication was that you knew your statements were false.

Privilege

Your statements were not privileged.

You are engaged in spewing a flood of falsehoods and venom, knowing it was false. These statements were not matters of opinion, as you were fabricating facts to libel Perla Group International, Inc. and Mr. D'Alberto. You were not making a fair report on public documents.

You had no duty or interest in Perla Group International, Inc. and Mr. D'Alberto except to destroy Perla Group International, Inc. and Mr. D'Alberto and their legitimate business and reputation.

Your libelous statements were not made in good faith, had not good motive and were entirely for the purpose of harming Group International, Inc. and Mr. D'Alberto.

They are not not public figures and not limited purpose public figures.

Your statements posted on the websites and blogs placed Group International, Inc. and Mr. D'Alberto before the public in a false light.

Your statements posted on the aforementioned blogs are "highly offensive to a reasonable person."

You are at fault and knew or were in reckless disregard as to the falsehood of these statements.

As a direct and proximate result of your statements above, Perla Group International, Inc. and Mr. D'Alberto have been and will continue to be damaged and injured in their respective characters, reputations and business.

CYBERSTALKING

You also committed numerous deliberate actions of cyberstalking.

Cyberstalking is the use of the Internet or other electronic means to stalk someone. It has been defined as the use of information and communications technology, particularly the Internet, by an individual or group of individuals, to harass another individual, group of individuals, or organization. The behavior includes false accusations, monitoring, the transmission of threats, identity theft, damage to data or equipment, the solicitation of minors for sexual purposes, and gathering information for harassment purposes. The harassment must be such that a reasonable person, in possession of the same information, would regard it as sufficient to cause another reasonable person distress.

Stalking is a continuous process, consisting of a series of actions, each of which may be entirely legal in itself.

Stalking is a form of mental assault, in which the perpetrator repeatedly, wantonly, and disruptively breaks into the life of the victim. Moreover, the separated acts that make up the intrusion may not by themselves cause mental abuse, but do taken together cause mental abuse.

You in cyberstalking Perla Group International, Inc. and Mr. D'Alberto acted with malice, premeditation, repetition, to cause distress, with no legitimate purpose. Your attacks were personally directed. You further disregarded warnings to stop the harassment, and threats.

You in your cyberstalking used false accusations.

You in your cyberstalking tried to damage the reputation of Perla Group International, Inc. and Mr. D'Alberto and turn other people against them, causing huge damages to Perla Group International, Inc. and Mr. D'Alberto.

You repeatedly posted false information about Perla Group International, Inc. and Mr. D'Alberto on various websites and blogs and other outlets including newsgroups, chat rooms and other sites that allow public contributions.

You encouraged others to harass and sue the Perla Group International, Inc. and Mr. D'Alberto.

Florida has incorporated electronically communicated statements as conduct constituting stalking in its anti-stalking laws, as have many other states.

You engaged repeatedly, intentionally, maliciously and deliberately engaged in cyberstalking by engaging in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, on InvestorsHub.com. which communications were directed *inter alia* at Perla Group International, Inc. and Mr. D'Alberto and their shareholders causing substantial emotional distress to those persons and serving no legitimate purpose.

The Florida law on stalking is Section 784.048:

Stalking; definitions; penalties.-

(1) As used in this section, the term:

(a) "Harass" means to engage in a course of conduct directed at a specific person that causes substantial emotional

distress in such person and serves no legitimate purpose.

(b) "Course of conduct" means a pattern of conduct composed of a series of acts over a period of time, however short, evidencing a continuity of purpose. Constitutionally protected activity is not included within the meaning of "course of conduct." Such constitutionally protected activity includes picketing or other organized protests.

(c) "Credible threat" means a threat made with the intent to cause the person who is the target of the threat to reasonably fear for his or her safety. The threat must be against the life of, or a threat to cause bodily injury to, a person.

(d) "Cyberstalk" means to engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, directed at a specific person, causing substantial emotional distress to that person and serving no legitimate purpose.

(2) Any person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person commits the offense of stalking, a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

(3) Any person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person, and makes a credible threat with the intent to place that person in reasonable fear of death or bodily injury of the person, or the person's child, sibling, spouse, parent, or dependent, commits the offense of aggravated stalking, a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(4) Any person who, after an injunction for protection against repeat violence, sexual violence, or dating violence pursuant to s. 784.046, or an injunction for protection against domestic violence pursuant to s. 741.30, or after any other court-imposed prohibition of conduct toward the subject person or that person's property, knowingly, willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person commits the offense of aggravated stalking, a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

..

(6) Any law enforcement officer may arrest, without a warrant, any person he or she has probable cause to believe

has violated the provisions of this section.
(7) Any person who, after having been sentenced for a violation of s. 794.011, s. 800.04, or s. 847.0135(5) and prohibited from contacting the victim of the offense under s. 921.244, willfully, maliciously, and repeatedly follows, harasses, or cyberstalks the victim commits the offense of aggravated stalking, a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.
(8) The punishment imposed under this section shall run consecutive to any former sentence imposed for a conviction for any offense under s. 794.011, s. 800.04, or s. 847.0135(5).

Thus, cyberstalking in Florida is a third degree felony.

My clients have suffered severe emotional and huge financial damage from your cyberstalking.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

You, by and through the making of such false, defamatory, and libelous statements, behaved intentionally and/or recklessly.

You, by and through the making of such false, defamatory, and libelous statements, intended to cause emotional distress upon Perla Group International, Inc. and Mr. D'Alberto.

The making of such false, defamatory, and libelous statements, by you, was so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

Mr. D'Alberto has suffered and continues to suffer severe emotional distress and emotional injury.

Your aforementioned actions were the direct and proximate cause of such severe emotional distress and emotional injury to Perla Group International, Inc. and Mr. D'Alberto.

Perla Group International, Inc. and Mr. D'Alberto suffered and continue to suffer mental anguish as a result of being defamed and libeled by you, and said mental anguish is of a nature that no reasonable person could be expected to endure.

INTERFERENCE WITH BUSINESS RELATIONS

In defaming Perla Group International, Inc. and Mr. D'Alberto and posting false statements on the Internet available to millions of people, you maliciously and wrongfully interfering with the economic activities and relationships or prospective relationships of my clients.

Your actions were intentional and willful acts calculated to cause damage to the Perla Group International, Inc. and Mr. D'Alberto in their lawful business, were done with the unlawful purpose to cause such damage and loss, without right or justifiable cause on the part of the you with malice and resulted in actual damage and loss.

Your interference was and is independently wrongful. your interference was and is by means of defamation, injurious falsehoods and other fraud, and other independently wrongful actions.

Your intentional interference with Perla Group International, Inc.'s contractual relations not only interfered with my clients' existing business relations, you intentionally interfered with prospective business relations of Perla Group International, Inc.

You are and were attempting to stop new investors from buying stock in Perla Group International, Inc.

You are attempting to induce existing holders of stock in Perla Group International, Inc. to sell their stock,

You are attempting to induce investors to sell Perla Group International, Inc. stock short to depress its price,

You are attempting to induce prospective clients of Perla Group International, Inc. to

refuse to do business with Perla Group International, Inc.,

You are attempting to deprive Perla Group International, Inc. of finance,

You are attempting to induce existing clients of Perla Group to leave Perla Group International, Inc. and stop doing business with Perla Group International, Inc., and to cause Perla Group International, Inc. and Mr. D'Alberto to otherwise lose business.

You are attempting to cause valuable employees not to work for Perla Group International, Inc., and to cause Perla Group International, Inc. and Mr. D'Alberto to otherwise lose business.

You are attempting to induce existing employees of Perla Group International, Inc. to leave Perla Group International, Inc., and to cause Perla Group International, Inc. and Mr. D'Alberto to otherwise lose business.

You are attempting to cause Perla Group International, Inc. and Mr. D'Alberto to otherwise lose business.

You are attempting harm Perla Group International, Inc. and Mr. D'Alberto in any way possible.

you contacted more people to try to get them to sue the company and these people have informed Mr. D'Alberto on your activities.

You continue to try to stop the Perla Group International, Inc. by interfering and destroying our growth and prosperity by any means.

In such interference with business relations, you used many improper means, including but not limited to, such means as fraud and defamation.

FRAUD AND RELATED TORTS

FEDERAL SECURITIES FRAUD

You in your efforts to harm and destroy Perla Group International, Inc. and Mr. D'Alberto repeatedly committed securities fraud.

Federal securities fraud is defined as follows by SEC Rule 10b-5:

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§ 240.10b-5 Employment of manipulative and deceptive devices.

It shall be unlawful for any person, directly or indirectly, by the use of any means or instrumentality of interstate commerce, or of the mails or of any facility of any national securities exchange,

(a) To employ any device, scheme, or artifice to defraud,

(b) To make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or

(c) To engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person, in connection with the purchase or sale of any security.

You repeatedly posted fraudulent statements on the InvestorsHub.com website.

You repeatedly made fraudulent statements about my clients with the intention and effect of manipulating Perla Group International, Inc.'s stock down in price, thus defrauding Perla Group International, Inc.'s shareholders and prospective investors.

FEDERAL – CRIMINAL --WIRE FRAUD

You repeatedly and deliberately committed federal wire fraud.

Wire fraud is criminal under Federal law. The crime of wire fraud is 18 U.S.C. § 1343, and reads as follows:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both. If the violation affects a financial institution, such person shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.

Your misrepresentations were material misrepresentations capable of influencing, and had a natural tendency of influencing, those making investment decisions regarding Perla Group International, Inc.'s securities.

This Federal law does not require that you profit; only that you harmed the Perla Group International, Inc. and Mr. D'Alberto and others.

You commit wire fraud by devising, schemes and artifices to defraud investors regarding Perla Group International, Inc. stock using fraudulent material representations, with the intent to defraud using interstate wire facilities and telecommunications.

You repeatedly posted material false information on the Internet, knowing it is false or with reckless disregard of its truth.

Such statements were posted on InvestorsHub.com and on other Internet sites.

In doing so, you intended to defraud Perla Group International, Inc. and Mr. D'Alberto,

the shareholders of Perla Group International, Inc., and present and prospective customers of Perla Group International, Inc.

You intentionally manipulated Perla Group International, Inc. Stock to depress its fair market value.

This law carries severe penalties:

--Section 32 --Penalties

Willful violations; false and misleading statements

Any person who willfully violates any provision of this title (other than section 30A), or any rule or regulation thereunder the violation of which is made unlawful or the observance of which is required under the terms of this title, or any person who willfully and knowingly makes, or causes to be made, any statement in any application, report, or document required to be filed under this title or any rule or regulation thereunder or any undertaking contained in a registration statement as provided in subsection (d) of section 15, or by any self-regulatory organization in connection with an application for membership or participation therein or to become associated with a member thereof, which statement was false or misleading with respect to any material fact, shall upon conviction be fined not more than \$5,000,000, or imprisoned not more than 20 years, or both, except that when such person is a person other than a natural person, a fine not exceeding \$25,000,000 may be imposed; but no person shall be subject to imprisonment under this section for the violation of any rule or regulation if he proves that he had no knowledge of such rule or regulation.

FEDERAL – CIVIL LIABILITY --SECURITIES FRAUD --10b5

Federal statutes also provide for civil liability for securities fraud.

The Supreme Court has held that there are six elements that a my clients must allege and prove in order to prevail in a Rule 10b-5 action:

1. That you made a "material misrepresentation or omission";
2. That you acted with "scienter", or a "wrongful state of mind" (typically understood to mean that the you intended to make the material misrepresentation or omission, or acted with recklessness in making the misrepresentation or omission);
3. The material misrepresentation or omission was made "in connection with the purchase or sale of a security";
4. My clients who were allegedly victimized by the fraud relied upon the material misrepresentation or omission (if the security is traded on a public stock exchange, such as the New York Stock Exchange or NASDAQ, the law will typically presume that shareholders rely on the integrity of the market, and therefore that the price of the stock reflected material misrepresentation and that shareholders relied upon the integrity of the market);
5. That my clients suffered an economic loss as a result of the alleged fraud; and
6. That my clients can allege and prove "loss causation", which means that the allegedly fraudulent misrepresentation or omission caused the my clients' economic loss.

You repeatedly committed such securities fraud, causing my clients' economic loss in the loss in value of the stock price, driving away investors, causing shareholders to sell their stock, driving away customers and employees, and harming Perla Group International, Inc. and Mr. D'Alberto' reputation.

My clients need not prove that you profited.

FLORIDA –CRIMINAL SECURITIES FRAUD

Naturally Florida makes securities fraud a crime:

517.301 Fraudulent transactions; falsification or concealment of facts.-(1) It is unlawful and a violation of the provisions of this chapter for a person:

(a) In connection with the rendering of any investment advice or in connection with the offer, sale, or purchase of any investment or security, including any security exempted under the provisions of s. 517.051 and including any security sold in a transaction exempted under the provisions of s. 517.061, directly or indirectly:

1. To employ any device, scheme, or artifice to defraud;

2. To obtain money or property by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or

3. To engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon a person.

(b) To publish, give publicity to, or circulate any notice, circular, advertisement, newspaper, article, letter, investment service, communication, or broadcast which, though not purporting to offer a security for sale, describes such security for a consideration received or to be received directly or indirectly from an issuer, underwriter, or dealer, or from an agent or employee of an issuer, underwriter, or dealer, without fully disclosing the receipt, whether past or prospective, of such consideration and the amount of the consideration.

(c) In any matter within the jurisdiction of the office, to knowingly and willfully falsify, conceal, or cover up, by any trick, scheme, or device, a material fact, make any false, fictitious, or fraudulent statement or representation, or make or use any false writing or document, knowing the same to contain any false, fictitious, or fraudulent statement or entry.

(2) For purposes of ss. 517.311 and 517.312 and this section, the term "investment" means any commitment of money or property principally induced by a representation that an economic benefit may be derived from such commitment, except that the term does not include a commitment of money or property for:

(a) The purchase of a business opportunity, business enterprise, or real property through a person licensed under chapter 475 or registered under former chapter 498; or

(b) The purchase of tangible personal property through a person not engaged in telephone solicitation, where said property is offered and sold in accordance with the following conditions:

1. There are no specific representations or guarantees made by the offeror or seller as to the economic benefit to be derived from the purchase;

2. The tangible property is delivered to the purchaser within 30 days after sale, except that such 30-day period may be extended by the office if market conditions so warrant; and

3. The seller has offered the purchaser a full refund policy in writing, exercisable by the purchaser within 10 days of the date of delivery of such tangible personal property, except that the amount of such refund may not exceed the bid price in effect at the time the property is returned to the seller. If the applicable sellers' market is closed at the time the property is returned to the seller for a refund, the amount of such refund shall be based on the bid price for such property at the next opening of such market.

517.302 Criminal penalties; alternative fine; Anti-Fraud Trust Fund; time limitation for criminal prosecution.-

1) Whoever violates any of the provisions of this chapter is guilty of a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(2) Any person who violates the provisions of s. 517.312(1) by obtaining money or property of an aggregate value exceeding \$50,000 from five or more persons is guilty of a felony of the first degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(3) In lieu of a fine otherwise authorized by law, a person who has been convicted of or who has pleaded guilty or no contest to having engaged in conduct in violation of the provisions of this chapter may be sentenced to pay a fine that does not exceed the greater of three times the gross value gained or three times the gross loss caused by such conduct, plus court costs and the costs of investigation and prosecution reasonably incurred.

(a) There is created within the office a trust fund to be known as the Anti-Fraud Trust Fund. Any amounts assessed as costs of investigation and prosecution under this

subsection shall be deposited in the trust fund. Funds deposited in such trust fund shall be used, when authorized by appropriation, for investigation and prosecution of administrative, civil, and criminal actions arising under the provisions of this chapter. Funds may also be used to improve the public's awareness and understanding of prudent investing.

(b) The office shall report to the Executive Office of the Governor annually by November 15, the amounts deposited into the Anti-Fraud Trust Fund during the previous fiscal year. The Executive Office of the Governor shall distribute these reports to the President of the Senate and the Speaker of the House of Representatives.

(4) Criminal prosecution for offenses under this chapter is subject to the time limitations of s. 775.15.

775.15 Time limitations; general time limitations; exceptions.-

1) A prosecution for a capital felony, a life felony, or a felony that resulted in a death may be commenced at any time. If the death penalty is held to be unconstitutional by the Florida Supreme Court or the United States Supreme Court, all crimes designated as capital felonies shall be considered life felonies for the purposes of this section, and prosecution for such crimes may be commenced at any time.

(2) Except as otherwise provided in this section, prosecutions for other offenses are subject to the following periods of limitation:

(a) A prosecution for a felony of the first degree must be commenced within 4 years after it is committed.

(b) A prosecution for any other felony must be commenced within 3 years after it is committed.

(c) A prosecution for a misdemeanor of the first degree must be commenced within 2 years after it is committed.

(d) A prosecution for a misdemeanor of the second degree or a noncriminal violation must be commenced within 1 year after it is committed.

(3) An offense is committed either when every element has occurred or, if a legislative purpose to prohibit a continuing course of conduct plainly appears, at the time when the course of conduct or the your complicity therein is terminated. Time starts to run on the day after the offense is

committed.

(4)(a) Prosecution on a charge on which the you has previously been arrested or served with a summons is commenced by the filing of an indictment, information, or other charging document.

(b) A prosecution on a charge on which the you has not previously been arrested or served with a summons is commenced when either an indictment or information is filed, provided the capias, summons, or other process issued on such indictment or information is executed without unreasonable delay. In determining what is reasonable, inability to locate the you after diligent search or the your absence from the state shall be considered. The failure to execute process on or extradite a you in another state who has been charged by information or indictment with a crime in this state shall not constitute an unreasonable delay.

(c) If, however, an indictment or information has been filed within the time period prescribed in this section and the indictment or information is dismissed or set aside because of a defect in its content or form after the time period has elapsed, the period for commencing prosecution shall be extended 3 months from the time the indictment or information is dismissed or set aside.

(5) The period of limitation does not run during any time when the you is continuously absent from the state or has no reasonably ascertainable place of abode or work within the state. This provision shall not extend the period of limitation otherwise applicable by more than 3 years, but shall not be construed to limit the prosecution of a you who has been timely charged by indictment or information or other charging document and who has not been arrested due to his or her absence from this state or has not been extradited for prosecution from another state.

(6) A prosecution for perjury in an official proceeding that relates to the prosecution of a capital felony may be commenced at any time.

(7) A prosecution for a felony that resulted in injury to any person, when such felony arises from the use of a "destructive device," as defined in s. 790.001, may be commenced within 10 years.

(8) A prosecution for a felony violation of

chapter 517 or s. 409.920 must be commenced within 5 years after the violation is committed.

(9) A prosecution for a felony violation of chapter 403 must be commenced within 5 years after the date of discovery of the violation.

(10) A prosecution for a felony violation of s. 825.102 or s. 825.103 must be commenced within 5 years after it is committed.

(11) A prosecution for a felony violation of ss. 440.105 and 817.234 must be commenced within 5 years after the violation is committed.

(12) If the period prescribed in subsection (2), subsection (8), subsection (9), subsection (10), or subsection (11) has expired, a prosecution may nevertheless be commenced for:

(a) Any offense, a material element of which is either fraud or a breach of fiduciary obligation, within 1 year after discovery of the offense by an aggrieved party or by a person who has a legal duty to represent an aggrieved party and who is himself or herself not a party to the offense, but in no case shall this provision extend the period of limitation otherwise applicable by more than 3 years.

(b) Any offense based upon misconduct in office by a public officer or employee at any time when the you is in public office or employment, within 2 years from the time he or she leaves public office or employment, or during any time permitted by any other part of this section, whichever time is greater.

You repeatedly violated this statute, causing massive damages to Perla Group International, Inc. and Mr. D'Alberto.

COMMON LAW FRAUD

Years ago you started on an unrelenting, malicious and criminal campaign to destroy Perla Group International, Inc. and Mr. D'Alberto your actions included but were not limited to, the following:

Posting false information about the Perla Group and it's CEO on hundreds of occasions on InvestorsHub and elsewhere.

By means of fraud, interfering with Perla Group's business relations.

The common law of fraud contains the following elements: a misstatement of material fact made with scienter that is reasonably relied upon and damages.

You deliberately made hundreds if not thousands of fraudulent statements that caused damages to our clients from lost stock market value, lost business, and more.

FLORIDA CIVIL THEFT REMEDY

Florida has a statutory remedy for civil theft cases.

Florida – Civil Theft Letter

Florida has a remedy known loosely as the “civil theft letter.” The my clients, before filing suit, sends a letter demanding triple the damage amount. If not paid in 30 days, the my clients gets such triple damages in the suit. Such letters have a chilling effect because the you rarely is able or wants to pay triple damages:

772.11 Civil remedy for theft or exploitation.-

1) Any person who proves by clear and convincing evidence that he or she has been injured in any fashion by reason of any violation of ss. 812.012-812.037 or s. 825.103(1) has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and court costs in the trial and appellate courts. Before filing an action for damages under this section, the person claiming injury must make a written demand for \$200 or the treble damage amount of the person liable for damages under this section. If the person to whom a written demand is made complies with such demand within 30 days after receipt of the demand, that person shall be given a written release from further civil liability for the specific act of theft or exploitation by the person making the written demand. Any person who has a cause of action under this section may recover the damages allowed under this

section from the parents or legal guardian of any unemancipated minor who lives with his or her parents or legal guardian and who is liable for damages under this section. Punitive damages may not be awarded under this section. The you is entitled to recover reasonable attorney's fees and court costs in the trial and appellate courts upon a finding that the claimant raised a claim that was without substantial fact or legal support. In awarding attorney's fees and costs under this section, the court may not consider the ability of the opposing party to pay such fees and costs. This section does not limit any right to recover attorney's fees or costs provided under any other law.

772.14 Estoppel of you.--A final judgment or decree rendered in favor of the state in any criminal proceeding concerning the conduct of the you which forms the basis for a civil cause of action under this chapter, or in any criminal proceeding under chapter 895, shall estop the you in any action brought pursuant to this chapter as to all matters as to which such judgment or decree would be an estoppel as if the my clients had been a party in the criminal action.

772.15 Admissibility of not guilty verdict.--A verdict or adjudication of not guilty rendered in favor of the you or in favor of any other person whose conduct forms the basis for a claim under this chapter shall be admissible in evidence, but shall not act as an estoppel against the my clients.

772.17 Limitation of actions.--Notwithstanding any other provision of law, a civil action or proceeding under this chapter may be commenced at any time within 5 years after the conduct in violation of a provision of this act terminates or the cause of action accrues. If a criminal prosecution or civil action or other proceeding is brought or intervened in by the state or by the United States to punish, prevent, or restrain any criminal activity or criminal conduct which forms the basis for a civil action under this chapter, the running of the period of limitations prescribed by this section shall be suspended during the pendency of such prosecution, action, or proceeding and for 2 years following its termination.

772.18 Cumulative remedy.--The application of one civil remedy under this chapter does not preclude the application of any other remedy, civil or criminal, under this chapter or any other provision of law. Civil remedies under this act are supplemental, and not mutually exclusive.

772.185 Attorney's fees taxed as costs.--Attorney's fees awarded under this chapter shall be taxed as costs.

772.19 Exemption.--No damages shall be recoverable under this chapter against the state or its agencies, instrumentalities, subdivisions, or municipalities.

This statute covers your crimes. This statute covers the following:

Chapter 812 --THEFT, ROBBERY, AND RELATED CRIMES View Entire Chapter

812.035 Civil remedies; limitation on civil and criminal actions.-(

1) Any circuit court may, after making due provisions for the rights of innocent persons, enjoin violations of the provisions of ss. 812.012-812.037 or s. 812.081 by issuing appropriate orders and judgments, including, but not limited to:

(a) Ordering any you to divest himself or herself of any interest in any enterprise, including real estate.

(b) Imposing reasonable restrictions upon the future activities or investments of any you, including, but not limited to, prohibiting any you from engaging in the same type of endeavor as the enterprise in which he or she was engaged in violation of the provisions of ss. 812.012-812.037 or s. 812.081.

(c) Ordering the dissolution or reorganization of any enterprise.

(d) Ordering the suspension or revocation of any license, permit, or prior approval granted to any enterprise by any department or agency of the state.

(e) Ordering the forfeiture of the charter of a corporation organized under the laws of the state or the revocation of a certificate authorizing a foreign corporation to conduct business within the state, upon finding that the board of directors or a managerial agent acting on behalf of the corporation, in conducting the affairs of

the corporation, has authorized or engaged in conduct in violation of ss. 812.012-812.037

or s. 812.081 and that, for the prevention of future criminal activity, the public interest requires the charter of the corporation forfeited and the corporation dissolved or the certificate revoked.

(2) All property, real or personal, including money, used in the course of, intended for use in the course of, derived from, or realized through conduct in violation of a provision of ss. 812.012-812.037 or s. 812.081 is subject to civil forfeiture to the state. The state shall dispose of all forfeited property as soon as commercially feasible. If property is not exercisable or transferable for value by the state, it shall expire. All forfeitures or dispositions under this section shall be made with due provision for the rights of innocent persons.

(3) Property subject to forfeiture under this section may be seized by a law enforcement officer upon court process. Seizure without process may be made if:

(a) The seizure is incident to a lawful arrest or search or an inspection under an administrative inspection warrant.

(b) The property subject to seizure has been the subject of a prior

judgment in favor of the state in a forfeiture proceeding based upon this section.

(c) The law enforcement officer has probable cause to believe that the property is directly or indirectly dangerous to the public health or safety.

(d) The law enforcement officer has probable cause to believe that the property is otherwise subject to forfeiture under this section.

(4) In the event of a seizure under subsection (3), a forfeiture proceeding shall be instituted promptly. When property is seized under this section, pending forfeiture and final disposition, the law enforcement officer may:

(a) Place the property under seal.

(b) Remove the property to a place designated by the court.

(c) Require another agency authorized by law to take custody of the property and remove it to an appropriate location.

(5) The Department of Legal Affairs, any state attorney, or any state agency having jurisdiction over conduct in violation of a provision of ss. 812.012-812.037 or s. 812.081 may institute civil proceedings under this section. In any action brought under this section, the circuit court shall proceed as soon as practicable to the hearing and determination. Pending final determination, the circuit court may at any time enter such injunctions, prohibitions, or restraining orders, or take such actions, including the acceptance of satisfactory performance bonds, as the court may deem proper.

(6) Any aggrieved person may institute a proceeding under subsection (1). In such proceeding, relief shall be granted in conformity with the principles that govern the granting of injunctive relief from threatened loss or damage in other civil cases, except that no showing of special or irreparable damage to the person shall have to be made. Upon the execution of proper bond against damages for an injunction improvidently granted and a showing of immediate danger of significant loss or damage, a temporary restraining order and a preliminary injunction may be issued in any such action before a final determination on the merits.

(7) The state, including any of its agencies, instrumentalities, subdivisions, or municipalities, if it proves by clear and convincing evidence that it has been

injured in any fashion by reason of any violation of the provisions of ss.

812.012-812.037 or s. 812.081, has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200 and shall also recover court costs and reasonable attorney's fees in the trial and appellate courts. In no event shall punitive damages be awarded under this section. The you shall be entitled to recover reasonable attorney's fees and court costs in the trial and appellate courts upon a finding that the claimant raised a claim which was without substantial fact or legal support.

(8) A final judgment or decree rendered in favor of the state in any criminal proceeding under ss. 812.012-812.037 or s. 812.081 shall estop the you in

any subsequent civil action or proceeding as to all matters as to which such judgment or decree would be an estoppel as between the parties.

(9) The Department of Legal Affairs may, upon timely application, intervene in any civil action or proceeding brought under subsection (6) or subsection (7) if he or she certifies that, in his or her opinion, the action or proceeding is of general public importance. In such action or proceeding, the state shall be entitled to the same relief as if the Department of Legal Affairs had instituted this action or proceeding.

(10) Notwithstanding any other provision of law, a criminal or civil action or proceeding under ss. 812.012-812.037 or s. 812.081 may be commenced at any time within 5 years after the cause of action accrues; however, in a criminal proceeding under ss. 812.012-812.037 or s. 812.081, the period of limitation does not run during any time when the you is continuously absent from the state

or is without a reasonably ascertainable place of abode or work within the state, but in no case shall this extend the period of limitation otherwise applicable by more than 1 year. If a criminal prosecution or civil action or other proceeding is brought, or intervened in, to punish, prevent, or restrain any violation of the provisions of ss. 812.012-812.037 or s. 812.081, the running of the period of limitations prescribed by this section with respect to any cause of action arising under subsection (6) or subsection (7) which is based in whole or in part upon any matter complained of in any such prosecution, action, or proceeding shall be suspended during the pendency of such prosecution, action, or proceeding and for 2 years following its termination.

(11) The application of one civil remedy under any provision of ss. 812.012-812.037 or s. 812.081 shall not preclude the application of any other remedy, civil or criminal, under ss. 812.012-812.037 or s. 812.081 or any other section of the Florida Statutes.

Chapter 772 of the Florida Statutes provides for civil lawsuits in cases of fraud and securities fraud. Triple damages are available:

CIVIL REMEDIES FOR CRIMINAL PRACTICES

772.102 Definitions.--As used in this chapter, the term:

(1) "Criminal activity" means to commit, to attempt to commit, to conspire to commit, or to solicit, coerce, or intimidate another person to commit:

1(a) Any crime that is chargeable by indictment or information under the following provisions:

..

5. Chapter 517, relating to securities transactions.

..

20. Chapter 812, relating to theft, robbery, and related crimes. /

..

21. Chapter 815, relating to computer-related crimes.

..

22. Chapter 817, relating to fraudulent practices, false pretenses, fraud generally, and credit card crimes.

(b) Any conduct which is subject to indictment or information as a criminal offense and listed in 18 U.S.C. s. 1961(1) (A), (B), (C), or (D).

..

(3) "Enterprise" means any individual, sole proprietorship, partnership, corporation, business trust, union chartered under the laws of this state, or other legal entity, or any unchartered union, association, or group of individuals associated in fact although not a legal entity; and the term includes illicit as well as licit enterprises and governmental, as well as other, entities.

(4) "Pattern of criminal activity" means engaging in at least two incidents of criminal activity that have the same or similar intents, results, accomplices, victims, or methods of commission or that otherwise are interrelated by distinguishing characteristics and are not isolated incidents; provided that the last of such incidents occurred within 5 years after a prior incident of criminal activity. For the purposes of this chapter, the term "pattern of criminal activity" shall not include two or more incidents of fraudulent conduct arising out of a single contract or transaction against one or more related persons.

..

(6) "Related persons" means, as to natural persons, persons who are related by blood within the second degree or who are married and, as to other persons, persons which are substantially under the same direction, ownership, or control, either directly or indirectly.

..

(a) Any crime that is chargeable by indictment or information under the following provisions:

5. Chapter 517, relating to securities transactions.

..

20. Chapter 812, relating to theft, robbery, and related crimes.
21. Chapter 815, relating to computer-related crimes.
22. Chapter 817, relating to fraudulent practices, false pretenses, fraud generally, and credit card crimes.

..

772.103 Prohibited activities.--It is unlawful for any person:

(1) Who has with criminal intent received any proceeds derived, directly or indirectly, from a pattern of criminal activity or through the collection of an unlawful debt to use or invest, whether directly or indirectly, any part of such proceeds, or the proceeds derived from the investment or use thereof, in the acquisition of any title to, or any right, interest, or equity in, real property or in the establishment or operation of any enterprise.

(2) Through a pattern of criminal activity or through the collection of an unlawful debt, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise or real property.

(3) Employed by, or associated with, any enterprise to conduct or participate, directly or indirectly, in such enterprise through a pattern of criminal activity or the collection of an unlawful debt.

(4) To conspire or endeavor to violate any of the provisions of subsection (1), subsection (2), or subsection (3).

772.104 Civil cause of action.--(1) Any person who proves by clear and convincing evidence that he or she has been injured by reason of any violation of the provisions of s. 772.103 shall have a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and court costs in the trial and appellate courts.

...

(3) In no event shall punitive damages be awarded under this section. The you shall be entitled to recover reasonable attorney's fees and court costs in the trial and appellate courts upon a finding that the claimant raised a claim which was without substantial fact or legal support. In awarding attorney's fees and costs under this section, the court shall not consider the ability of the opposing party to pay such fees and costs. Nothing under this section shall be interpreted as limiting any right to recover attorney's fees or costs provided under other provisions of law.

Be advised that this letter is your civil theft letter.

DAMAGES

My clients have suffered and continue to suffer huge damages from your tortuous conduct.

My clients have suffered huge financial losses, in addition to their emotional harm and loss of reputation.

PUNITIVE DAMAGES

Your aforementioned conduct was conscious, deliberate, intentional, and/or reckless in nature.

Your aforementioned conduct was undertaken in a state of mind, which evidences hatred, ill will, or a spirit of revenge.

Your actions are criminal action under Florida law.

Fla. Stat. 768.72(1) (“In any civil action, no claim for punitive damages shall be permitted unless there is a reasonable showing by evidence in the record or proffered by the claimant which would provide a reasonable basis for recovery of such damages...”)

A you may be held liable for punitive damages only if the trier of fact, based on clear and convincing evidence, finds that the you was personally guilty of intentional misconduct or gross negligence.

Fla. Stat. 768.72 (2)

Generally, punitive damages claims are appropriate when there are allegations of gross negligence or intentional misconduct that are substantiated by a proffer of evidence.

Punitive Damages Arising through Allegations of Intentional Misconduct

Intentional misconduct is expressly defined by Florida Statutes:

“Intentional misconduct” means that the you had actual knowledge of the wrongfulness of the conduct and the high probability that injury or damage to the claimant would result and, despite that knowledge, intentionally pursued that course of conduct, resulting in injury or damage. Fla. Stat. 768.72(2)(a) (emphasis added)

A cursory review of the language of the statute would lead one to believe many claims, including but not limited to, fraud, breach of fiduciary duty, conversion, tortious interference, misappropriation of assets, and shareholder oppression would support a claim for punitive damages.

Your aforementioned conduct evidences a conscious disregard for the rights of other persons and has a great probability of causing substantial harm.

It is likely that your defamation has caused and continues to cause potential customers and potential investors of Perla Group International, Inc. and Mr. D'Alberto to avoid Perla Group International, Inc. and Mr. D'Alberto, costing Perla Group International, Inc. and Mr. D'Alberto tens of millions of dollars in lost financing, revenues and profits.

As a result, Perla Group International, Inc. and Mr. D'Alberto are entitled to punitive damages and attorneys' fees.

Damages Calculated

The cumulative damages may fairly be regarded as monumental. We estimate them as follows:

1. Lost signed contracts with purchase orders: at least \$30 million.
2. Lost potential contracts: \$20-30 million per year.
3. Lost market capitalization of Perla: At the start of your attacks the share price was \$0.03 for a market cap of \$9 million and the current share price is \$0.002 for a market cap of \$590,00, creating a loss of \$8.4 million.
4. Damage to reputation of \$10 million at least.

5. Emotional distress damages: \$10 million due to lost and damaged social life, family life, relationships, due to your defamation on the Internet.

This amounts to well over \$100,000,000. We therefore claim triple this amount or \$300,000,000 under the Civil Theft statute.

As provided in the statute, you have thirty (30) days to comply with this demand.

Other Wrongful Actions

We intend to sue you for certain other wrongful actions not covered by the Civil Theft statute, including, but not limited to: tortuous interference with business relations, defamation,

This is a serious matter and we strongly recommend that you seek legal counsel immediately. We do intend on filing suit against you.

Govern yourself accordingly,

John E. Lux