

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN
AND FOR MIAMI-DADE COUNTY,
FLORIDA

CASE NO. _____

ABELARDO DE LA ESPRIELLA,

Plaintiff,

v.

DANIEL CORONELL,

Defendant.

_____ /

VERIFIED COMPLAINT
(Jury Trial Demanded)

Plaintiff, Abelardo De La Espriella, sues Defendant, Daniel Coronell, for his defamatory statements and alleges:

1. This is a civil action for defamation and intentional infliction of emotional distress, based on statements made by the Defendant stating and/or implying that Alberardo De La Espriella has engaged in illegal activities, tax evasion, influence peddling, bribery or corrupt activities. Those statements and implications are false and/or designed to create false impressions and implications, and demonstrate that the Defendant endorses the defamatory statements and inferences.

2. The amount in controversy, exclusive of interest and costs, exceeds \$15,000.

3. All conditions precedent to this action pursuant to Florida Statutes section 770.01 have been satisfied. Defendant Coronell was served with the required Notice on January 26, 2018.

PARTIES AND JURISDICTION

4. Plaintiff, Abelardo De La Espriella, is a lawful permanent resident of the United States and resides in Miami, Florida.

5. Defendant, Daniel Coronell, is either a lawful permanent resident of the United States or a United States citizen. He resides in Miami, Florida. He has published, in Miami-Dade County, by electronic form, statements which constitute defamation by implication for the purpose of harming Abelardo De La Espriella and causing him emotional distress.

6. Venue is proper in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida pursuant to Florida Statutes section 47.011.

FACTS

7. Defendant Daniel Coronell stated and published, by electronic means, statements about Abelardo De La Espriella including, but not limited to:

- a) Colombia has very prominent and successful lawyers. Some of them receive large fees for their work. They advise multinationals or file millionaire demands over which they charge important percentages. Many of these lawyers are rich on account of their work, but I only know one Colombian lawyer with a private jet.
- b) He's Abelardo de la Espriella Otero. A criminal attorney who joined the fray in 2006, in the same column, when bidders for the El Dorado airport expansion had to reveal the law firms that advised them and the fees that were paid.
- c) In that bidding process, along with the most prestigious law firms in Colombia an unknown firm called Lawyers Enterprise appeared, which the previous year had had a profit of just over one million pesos. The surprise did not stop there, the small Lawyers was charging the highest bidding fees. Its generous client was the consortium ASA International, of which the Nule were part.

- d) The owner of the firm turned out to be Abelardo de la Espriella, of 28 years of age. Mr. de la Espriella was not known at that time for his legal achievements.
- e) No one could explain – and to this day it’s still a mystery – what valuable service could the young lawyer be providing to the Nule bidders to pay USD 800,000 for his advise.
- f) The plane is a three-engine Dassault-Berguet Falcon 50 jet. It has the US registration number N963JN and is registered under the name of a company called Delaware Trust Co Trustee, in the state of the same name, which operates with tax haven characteristics within the United States.
- g) Public records show that the jet, in addition to his favorite destinations of Bogota, Barranquilla and South Florida, has flown to Caracas, Venezuela; to Bonaire, in the Netherlands Antilles; and to the tax havens of Nassau, in the Bahamas, and George Town, in Grand Cayman.

8. Defendant Daniel Coronell made these statements in an article titled “El Avion” (“The Plane”), which was published on January 6, 2018. Copies of the original article, written in Spanish, and an official translation into English, are attached as Exhibits to this Verified Complaint.

9. Comments published by readers of the article, posted on line in response to the article, reflect the defamatory implications which arose from the article. Among others, the following comments were made, referring to the Coronell statements regarding Abelardo De La Espriella:

- This man is even more enmeshed in corruption than the politicians. Justice has to put its radars at work to find out the source of his fortune...
- Good for you my Coronel [sic]. We have to defeat corruption. Congratulations.
- Behind every great fortune, there is a crime...

- Behind these lawyers, that flash around money of dubious origin and that are well connected with the government; there is always something hidden that is rotten...
- You Idiot, the reflection and the core message of the column is not about the goods but about the origin of the money used to acquire them. Think, use your head for more than a hat rack....
- The issue here is not about the good or bad taste of the lawyer. Here, the issue is that no one in Colombia can jump from middle class to millionaire in such a short time ... added to those trips to tax havens, it is possible that the Nule asked him to take some millions of tax havens? ... Remember that all the money that the Nule belongs to the Colombian citizens that paid their taxes to the government...
- Coronel is exposing/unmasking more than one "decent person" big-time.

COUNT I.
DEFAMATION BY IMPLICATION

10. Plaintiff repeats and realleges paragraphs 1-9.
11. Each of the above statements was made intentionally and juxtaposes a series of “facts” so as to imply a defamatory connection between them and/or create a defamatory implication by omitting facts, to create a different meaning than the truth and to impart false innuendos, suggestions, impressions and implications that Plaintiff Abelardo De La Espriella has engaged in illegal and/or corrupt activities.
12. The above statements were published and designed to reach and convey to Plaintiff’s business, social, legal (Plaintiff is a lawyer) and family communities the false impression of nefarious and improper conduct by the Plaintiff in his personal, social, legal and business life.
13. The above statements have harmed Abelardo De La Espriella in his personal, social, legal, business and personal reputations and caused him actual damages.

14. Wherefore, Plaintiff Abelardo De La Espriella seeks compensatory damages, and upon proper application under Florida law, punitive damages. Plaintiff demands a trial by jury.

Respectfully submitted,

/s/ Bruce S. Rogow

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Complaint was filed via ePortal and served via email upon all counsel below on this 16th day of February, 2018.

Counsel for Daniel Coronell

DEANNA K. SHULLMAN
SHULLMAN FUGATE PLLC
2101 Vista Parkway, Suite 4006
West Palm Beach, FL 33411
Phone: (561) 429-3619
dshullman@shullmanfugate.com

VERIFICATION BY ABELARDO DE LA ESPRIELLA

I, Abelardo De La Espriella, hereby state that I have read the foregoing Verified Complaint and that the facts set forth herein are true to the best of my knowledge, information and belief.

By: *Abelardo De La Espriella*
ABELARDO DE LA ESPRIELLA

STATE OF FLORIDA)
COUNTY OF BROWARD)

SWORN TO AND SUBSCRIBED before me this 3 day of February, 2018, by
ABELARDO DE LA ESPRIELLA, who is personally known to me or
who has produced FL DRIVER LICENSE as identification.

Cecilia Dunlavy
Notary Public
My Commission Expires:
Print Name: CECILIA DUNLAVEY

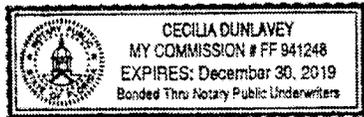


EXHIBIT 1

SEMANA MAGAZINE

Opinion

Daniel Coronell - 2018/01/06 22:15

The Plane

No one could explain –and to this day it's still a mystery– what valuable service could the young lawyer be providing to the Nule bidders to pay USD 800,000 for his advise.

Colombia has very prominent and successful lawyers. Some of them receive large fees for their work. They advise multinationals or file millionaire demands over which they charge important percentages. Many of these lawyers are rich on account of their work, but I only know one Colombian lawyer with a private jet.

He's Abelardo de la Espriella Otero. A criminal attorney who joined the fray in 2006, in this same column, when bidders for the El Dorado airport expansion had to reveal the law firms that advised them and the fees that were paid.

In that bidding process, along with the most prestigious law firms in Colombia an unknown firm called Lawyers Enterprise appeared, which the previous year had had a profit of just over one million pesos. The surprises did not stop there, the small Lawyers was charging the highest bidding fees. Its generous client was the consortium ASA Internacional, of which the Nule were part.

The owner of the firm turned out to be Abelardo de la Espriella, of 28 years of age. Mr De la Espriella was not known at that time for his legal achievements. His little fame was linked to the peace process with the paramilitaries and a foundation that advocated for the prohibition of extradition and for the State to recognize the same status for all armed actors. You can read the column that relates these events in [Semana.com](#). (Read the column here).

No one could explain –and to this day it's still a mystery– what valuable service could the young lawyer be providing to the Nule bidders to pay USD 800,000 for his advise.

Shortly after, Abelardo de la Espriella would rise to fame for his intelligence and skills –undeniable–, but above all for his way of seeking recognition in the media and also in social networks.

In these networks the lawyer has been posting photos of him and his jet. One of them portrays him posing with a distracted look at the horizon, at the perfect angle for the engines to be seen, while he goes down the ladder with a Louis Vuitton bag in his hand.

Another one taken inside the aircraft sees him with his right hand on the brim of his hat and holding a glass in the other hand, lifted barely enough for the sleeve of his shirt to slide down and show his gold watch. An Audemars Piguet Royal Oaks Offshore (really, that's the name), with a price that exceeds 84,000 dollars, according to the catalog. Something like 250 million pesos to decorate the wrist.

The plane is a three-engine Dassault-Breguet Falcon 50 jet. It has the US registration number N963JN and is registered under the name of a company called Delaware Trust Co Trustee, in the state of the same name, which operates with tax haven characteristics within the United States.



ANDRÉS ANTONIO JANER MORENO
Traductor e Intérprete Oficial
Inglés - Español Español - Inglés
Certificado de Idoneidad No. 0401
Expedido el 20 de Agosto de 2014

When I asked Mr. De la Espriella, a few weeks ago, who the plane belonged to, he replied "Belongs to a friend and business partner of mine." He did not reveal the identity of his business partner, nor did he tell me how much his jet cost: "I don't have to explain these things."

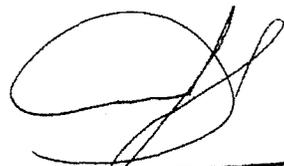
Public records show that the jet, in addition to his favorite destinations of Bogotá, Barranquilla and South Florida, has flown to Caracas, Venezuela; to Bonaire, in the Netherlands Antilles; and to the tax havens of Nassau, in the Bahamas, and George Town, in Grand Cayman.

In the conversation, Mr De la Espriella also told me that he had recently been to Cuba, but he didn't fly in his own jet but in a friend's, whose identity he couldn't reveal either.

He assured me that it was an exclusively tourist visit of just one day and that he did not meet anyone of interest there. He couldn't even tell me who accompanied him on his whirlwind trip to the island where the *castro-chavism* that he so despises emerged.

Anyway, the billionaire lifestyle of Mr Abelardo de la Espriella seems to be more interesting than the life he leads in Colombian courts. Or maybe not.

The above is a true and accurate translation into English of a document written in Spanish
Issue Date: January 16, 2018
Andrés Antonio Janer Moreno
Certified Translator and Interpreter
Certificate of Professional Qualification No. 0401 of August 20, 2014
Universidad Nacional de Colombia



ANDRÉS ANTONIO JANER MORENO
Traductor e Intérprete Oficial
Inglés - Español Español - Inglés
Certificado de Idoneidad No. 0401
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EXHIBIT 2

TENDENCIAS >

[ELECCIONES 2018 \(/NOTICIAS/ELECCIONES-2018/112729\)](#) [JORGE ENRIQUE ROBLEDO \(/NOTICIAS/JORGE-ENRIQUE-ROBLEDO/103934\)](#)

Opinión

Filtrar por autor

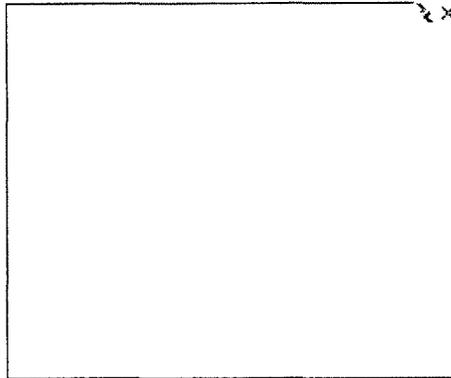


+ [DANIEL CORONELL \(/AUTOR/DANIEL-CORONELL/2\)](#) | 2018/01/06 22:15

El avión

([whatsapp://s](https://www.whatsapp.com)

Nadie se explicaba –y hoy sigue sin explicarse– cuál valioso servicio podía prestar el joven abogado para que los licitantes Nule le pagaran 800.000 dólares por una asesoría.



Colombia tiene abogados muy destacados y exitosos. Algunos de ellos perciben abultados honorarios por su trabajo. Asesoran multinacionales o interponen millonarias demandas sobre las cuales cobran importantes porcentajes. Muchos de esos abogados son ricos por cuenta de su trabajo, pero solo conozco un abogado colombiano con jet privado.

Se trata de Abelardo de la Espriella Otero. Un penalista que saltó a la palestra en el año 2006, en esta misma columna, cuando los proponentes de la licitación para la ampliación del aeropuerto El Dorado tuvieron que revelar las firmas de abogados que los asesoraban y los honorarios que les pagaban.

En esa licitación, al lado de los bufetes jurídicos más prestigiosos de Colombia, apareció una desconocida firma llamada Lawyers Enterprise, que el año anterior había tenido una utilidad apenas superior a un millón de pesos. Las sorpresas no pararon ahí, la pequeña Lawyers estaba cobrando los honorarios más altos de la



(whatsapp://s

El dueño de la firma resultó ser Abelardo de la Espriella, de 28 años de edad. El doctor De la Espriella no era conocido, en ese tiempo, por sus logros jurídicos. Su escasa fama estaba ligada al proceso de paz con los paramilitares y a una fundación que pedía prohibir la extradición y que el Estado le reconociera el mismo estatus a todos los actores armados. Ustedes pueden leer la columna que relata estos hechos en Semana.com. ([Lea la columna aquí](http://www.semana.com/opinion/articulo/el-apoderado/80545-3) (<http://www.semana.com/opinion/articulo/el-apoderado/80545-3>))

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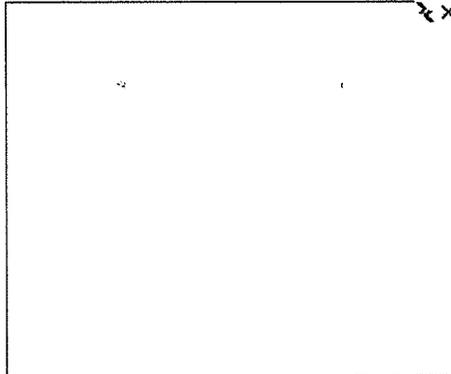
Poco tiempo después Abelardo de la Espriella saltaría a la fama por su inteligencia y habilidad -innegables-, pero sobre todo por su manera de buscar reconocimiento en los medios de comunicación y también en las redes sociales.

En esas redes el abogado viene publicando fotos suyas y de su jet. Una de ellas lo retrata posando con distraída mirada al horizonte, en el ángulo perfecto para que se vean las turbinas, mientras él baja la escalerilla con un maletín Louis Vuitton en la mano.



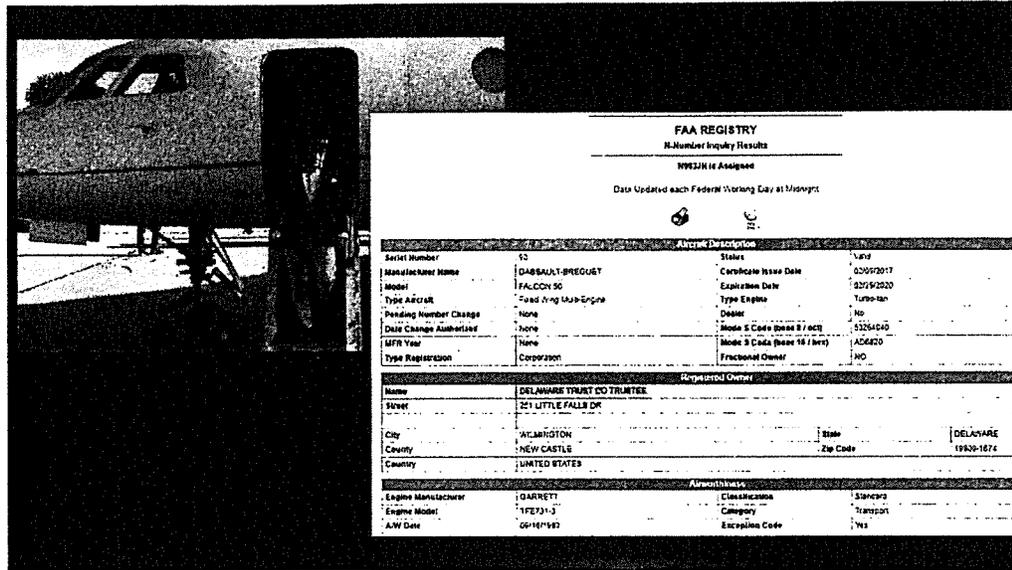
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Otra tomada en el interior de la aeronave lo deja ver con la mano derecha en el ala del sombrero y con un vaso en la otra mano que sube un poquito, apenas lo suficiente para que se levante la manga de su camisa y deje ver su reloj de oro. Un Audemars Piguet Royal Oaks Offshore (de verdad, se llama así) cuyo precio supera los 84.000 dólares, según catálogo. Algo así como 250 millones de pesos para adornarse la muñeca.



    El avión es un jet Dassault-Breguet Falcon 50 de tres turbinas. Tiene la matrícula N963JN y está registrado a nombre de una compañía llamada Delaware Trust Co Trustee, en el estado del mismo nombre que opera con para clientes de paraíso fiscal dentro de Estados Unidos.

<https://www.whatsapp.com>



Cuando le pregunté al doctor De la Espriella, hace unas semanas, de quién era el avión me respondió “De un amigo socio y mío”. No me reveló la identidad de su socio, ni me contó cuánto costaba su jet: “No tengo que dar explicación sobre esas cosas”.

Los récords públicos muestran que el jet además de sus destinos favoritos de Bogotá, Barranquilla y el sur de la Florida, ha volado a Caracas, Venezuela; a Bonaire, en las Antillas Holandesas; y a los paraísos fiscales de Nassau, en las Bahamas, y George Town, en Grand Cayman.



<https://www.whatsapp.com>



Flight Number	Origin	Destination	Departure Time	Arrival Time	Status
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75	MIA	MDW	2018-01-01 08:00PM	2018-01-01 06:24PM	EST

En la conversación, el doctor De la Espriella también me contó que recientemente había estado en Cuba, pero no había volado en su jet sino en el de un amigo, cuya identidad tampoco podía revelar.

SV TARGET | enlaces patrocinados



Invierta En Cartagena
 Últimos días con inversión desde \$66.000.000
 Regístrese ya



Me aseguró que se trató de una visita exclusivamente turística de apenas un día y que no se reunió allá con nadie de interés. Tampoco me podía contar quiénes lo acompañaron en su viaje relámpago a la isla donde nació el castrochavismo que él tanto desprecia.





 ... de billonario que se da el doctor Abelardo de la Espriella, parece ser más interesante que la que lleva en los estrados colombianos. O quizás no.

[whatsapp://s](https://www.whatsapp.com)