

**COMMONWEALTH OF PUERTO RICO
COURT OF FIRST INSTANCE
SUPERIOR CHAMBER OF SAN JUAN**

Enrique Martin Morales

Plaintiff

v.

Dennis Yadiel Sanchez Martin

Defendant

Civil Num.:

Extorsion, Malicious Prosecution,
Abuse of Rights, Damages

COMPLAINT

TO THE HONORABLE COURT:

COMES NOW Plaintiff Enrique Martin Morales, through the undersigned counsel and very respectfully **STATES** and **PRAYS** as follows:

I. INTRODUCTION

The present case is about a world-famous artist, who is being persecuted, besieged, harassed, stalked and extorted by a maladjusted person, whose interest is to obtain an economic benefit or, in the alternative, will continue his eagerness to assassinate the reputation and integrity of the artist. The situation has continued despite the Defendant voluntarily withdrawing from an action he had commenced against Plaintiff based on falsehoods, during which he admitted under oath that he had never been sexually assaulted by Plaintiff.

II. THE PARTIES

1. Plaintiff Enrique Martin Morales, better known as Ricky Martin, is of legal age and a natural person with the capacity to sue and be sued. His address is: P.O. Box 13345, San Juan, Puerto Rico 00908. Plaintiff is a singer, author and actor by profession.

2. Defendant, Dennis Yadiel Sánchez Martin (hereinafter "Sánchez") is of legal age, with the capacity to sue and be sued. His address is: Urbanización Matienzo Cintrón, Calle Tarragona número 532, San Juan, Puerto Rico 00923.

III. FACTS

3. Plaintiff is a world-class and world-famous artist, who began working at the tender age of twelve (12) years, achieving fame as a member of the musical group Menudo. After finishing his participation with said group, Plaintiff continued his musical career as a soloist until present-day, becoming known worldwide, not only for his artistic talent, but for his arduous and tireless humanitarian and social work against human trafficking.

4. Defendant Sanchez is Plaintiff's nephew. Defendant Sanchez's mother is Plaintiff's sister through Plaintiff's mother. According to information and belief, at this time, Defendant Sánchez resides with his father, Dennis Sánchez Miranda.

5. Defendant Sanchez publicly boasted being Plaintiff Ricky Martin's nephew.

6. From approximately October 2021 to January 2022, Defendant Sánchez was sending constant messages to Plaintiff through the WhatsApp and Instagram platforms. Sometimes, messages exceeded more than ten (10) in a single day. For the most part, the messages were meaningless and purposeless diatribes, written, clearly, by an maladjusted individual. However, Plaintiff, in the role of uncle, answered them when he could, trying to provide him with words of encouragement and desires for improvement.

7. During the month of November, Defendant Sánchez sent several messages to Plaintiff, declaring in a form totally disconnected from reality, that being his nephew, and saying it publicly, he stopped being a "normal" person and could be whoever he wanted. That is, that, being his nephew made him feel that he was "somebody".

8. In mid-December 2021, and in his desperate desire for attention, Defendant Sánchez sent Plaintiff a photo of his profile on his Instagram page, telling him that he loved him very much and asked Plaintiff to follow him or give him a "follow" on Instagram, in order for him to boast being Plaintiff's nephew. Plaintiff did not do so.

9. In his insistent and unbridled pattern of gaining Plaintiff's attention, on December 23, 2021, Defendant Sánchez sent a message indicating that he wanted to take Plaintiff's minor children to the movie theater, to which Plaintiff immediately replied no to.

10. On January 14, 2022, Defendant Sanchez sent a message to Plaintiff informing him that he had created a "page" for one of Plaintiff's minor children. Naturally, Plaintiff, who did not in any way wish for any information about their children to be published without their consent, was greatly dismayed and ignored all the messages that Defendant Sánchez subsequently sent to him.

11. As an act of retaliation for the silence and lack of attention from Plaintiff towards him, Defendant Sánchez published on his social networks, specifically on Instagram, "Ricky Martin" followed by Plaintiff's very private cell phone number. As a result of such publication, Plaintiff began to receive calls alerting him of what Defendant Sánchez had done.

12. Defendant Sánchez made such publication precisely in order for Plaintiff to be harassed with innumerable calls to his cell phone, and in this way harm him. As a consequence of such culpable action by Defendant Sánchez, Plaintiff had no alternative but to immediately change his cell phone number.

13. Several months passed without Plaintiff having any communication with Defendant Sánchez. However, on July 1, 2022, without probable cause or any basis, Defendant Sánchez went to the Court of First Instance, Municipal Chamber of San Juan, to request an Ex Parte Protective Order under Act #54-1989, P.R. Laws tit. 3, §601 *et seq.*, against Plaintiff, falsely accusing him of committing a crime.

14. In his request for a Protective Order, Defendant Sanchez falsely alleged that Plaintiff had had a romantic relationship with Defendant for seven (7) months, and that it had ended two (2) months prior. He further claimed that Plaintiff did not accept that the alleged relationship ended, and that Plaintiff called him frequently. Nothing could be further from the truth. Finally, Defendant Sánchez indicated that he feared for his safety, since he had seen Plaintiff "prowling" his residence on at least three (3) occasions, a totally false accusation since, at the time, Plaintiff had been residing in California uninterruptedly since May 28, 2022.

15. Defendant Sánchez made the accusations contained in his request for a Protective Order maliciously, without any probable cause, with serious disregard for the truth and knowing that they were false.

16. However, that same day, the Honorable Judge Raiza Cajigas Campbell held an *ex parte* hearing and issued a provisional Ex Parte Protective Order in favor of Defendant Sánchez. Said Order was valid for twenty (20) days, expiring on July 21, 2022. During the initial hearing and under oath, Defendant Sánchez admitted that he had not spoken to Plaintiff for a long time and that Plaintiff had never assaulted him sexually or in any other form.

17. Defendant Sanchez knew and had the expectation that his application for a Protective Order would be granted, as it was an *ex parte proceeding*. Similarly, Defendant Sánchez knew and had the expectation that, once granted, the Protective Order would be public knowledge worldwide, since the plaintiff is a world-famous artist. As a matter of fact, on the same day that the Protective Order was issued, Defendant Sánchez arrived at the offices of the newspaper El Vocero and personally left a copy of the Protective Order at reception, with the intention that the news be disseminated in the media immediately. Apropos, it was reported in most of the written and televised media in Puerto Rico and internationally, such as CNN, ABC, NBC, and the New York Times. The mere publication that a provisional Ex Parte Protective Order under Act 54 was issued against Plaintiff, albeit based on false allegations, created a cloud of suspicion that irretrievably strained Plaintiff's reputation. So much so, that Plaintiff saw his business opportunities threatened, that if it had not been for the malicious actions of the defendant Sánchez, they would not have been in any danger. The plaintiff, while in California with his children, learned that Defendant Sanchez had requested for and obtained an Ex Parte Protective Order against him in Puerto Rico. Plaintiff, who has always respected the law and order, and who has stood out worldwide for his humanitarian and philanthropic fight against human trafficking, felt confused and incredulous.

18. On July 4, 2022, Plaintiff was summoned through Attorney Carmelo Dávila Torres, who was given the Ex Parte Protective Order. In the Order, Plaintiff was ordered to appear on July 21, 2022, at an adjudicative hearing, to provide him the opportunity to be heard, in accordance with his constitutional right to due process and to defend himself against Defendant Sanchez's false accusations.

19. On July 5, 2022, Defendant Sánchez contacted Attorney Carmelo Dávila's Office, who had already been publicly identified by the media as Plaintiff's lawyer, and spoke with his secretary, Rosaura Díaz Martínez, to whom he said that the reason for his call was that he was interested in an appointment with Attorney Dávila. Attorney Dávila did not speak with Defendant Sánchez. By information and belief, Plaintiff understands that Defendant Sánchez made such call with the purpose of attempting to negotiate an economic benefit, in exchange for withdrawing his request for a Protective Order.

20. On July 7, 2022, on the instructions of Attorney Dávila, Secretary Díaz Martínez contacted Defendant Sánchez to ask if the for the appointment he was interested in coordinating he would be accompanied by a lawyer, family member or a third party. Defendant Sanchez replied that he had hired legal representation, but that he did not know his full name, only his nickname, and that he would not provide it. Faced with this situation, Attorney Dávila did not meet with Defendant Sánchez.

21. Thus, the day of the hearing signaled for July 21, 2022 arrived, during which Plaintiff would have his right to defend himself against the lies and falsehoods that Defendant Sánchez had already attributed to him. Plaintiff appeared virtually accompanied by his lawyers, ready to defend against all false accusations. For his part, Defendant Sánchez appeared virtually at the hearing accompanied by his legal representative, Attorney Jessica Bernard of the Office for the Integral Development of Women of the Municipality of San Juan.

22. At the beginning of the hearing, the Honorable Judge Cajigas Campbell asked the Parties if they were prepared to begin the hearing, to which both responded in the affirmative. The Court then proceeded to take oath from Plaintiff and Defendant Sanchez.

23. Next, Attorney Bernard, on behalf of Defendant Sánchez, requested the withdrawal of the action against Plaintiff and proceeded to present evidence on the voluntariness of the withdrawal by means of questions posed directly to Defendant Sánchez, to which he answered under oath.

24. Therefore, Defendant Sánchez testified under oath that he had made the decision to voluntarily desist from the action against Plaintiff, and that he had not been coerced in any way to desist from it.

25. In turn, the Honorable Judge Cajigas asked Defendant Sánchez directly if he agreed with everything that his legal representative had informed. He reiterated to the Court his desire to close the against Plaintiff and stated that he had not received a threat, coercion or money to desist from the action. Thus, Plaintiff left shattered, but airy from the process maliciously urged against him by Defendant Sánchez, as the action against him was closed.

26. Defendant Sanchez was already an experienced citizen in matters of Protective Orders for stalking, considering that the Court of First Instance, Superior Chamber of San Juan, had issued two (2) Protective Orders for stalking against Defendant Sánchez for having "threatened to destroy her" to Claudia Ramírez Martell and later to her boyfriend. See, Case Number BYL284 2021-2502 (601) and KLCE202100804 at the Court of Appeals of Puerto Rico. Both Protective Orders for stalking against Defendant Sanchez are in effect.

27. Defendant Sanchez filed his request for a Protective Order based on malice and animosity against Plaintiff, for the mere fact that he failed to answer his multiple messages. Defendant Sanchez's request for the July 1, 2022 Ex Parte Protective Order lacked probable cause, was based on lies and actual malice, and was intended to harass and harm Plaintiff, and tarnish his reputation.

28. Less than one (1) month after the adjudicative hearing, and as recent as August 12 and 14, 2022, defendant Sánchez once again sent messages to Plaintiff through Instagram, again attempting to seek the Plaintiff's attention. These messages read "Uncle I need your help" and "how are you?", respectively. The persecution and stalking by Defendant Sánchez have no other explanation than to cause even more harm than he has already done to Plaintiff.

29. Defendant Sánchez has threatened and extorted Plaintiff that, unless he is economically compensated, he will continue with his campaign to assassinate his reputation and integrity, through false and malicious imputations.

30. The reckless, malicious and culpable actions by Defendant Sánchez were motivated by the desire to expose Plaintiff to hatred and disdain from his fanbase, to threaten his business opportunities and to destroy his reputation. As a matter of fact, such actions caused Plaintiff to have multimillion dollar-contracts and present and future artistic projects cancelled. The pecuniary damages caused as a result of these actions are quantified in an amount not less than ten million dollars (\$10,000,000.00). In addition, such culpable actions have also caused damage to Plaintiff's reputation who, until the Protective Order became public knowledge, enjoyed an impeccable reputation earned through his long artistic and altruistic career for the last almost forty (40) years of his life. Such damages to Plaintiff's reputation are quantified at the date of the filing this lawsuit in an amount not less than twenty million dollars (\$20,000,000.00).

31. Defendant Sanchez is liable to Plaintiff for all damages caused by his negligent and/or culpable actions and/or omissions described above.

32. Defendant Sanchez's actions have caused Plaintiff and his family to feel unsafe in Puerto Rico. In accordance with Article 18 of the Puerto Rico Civil Code and Rule 56 of Civil Procedure, P.R. laws tit. 32, Ap. V, R.56, Plaintiff requests that this Honorable Court order Defendant Sánchez to immediately refrain from communicating with Plaintiff and his family, either personally, by telephone and/or through social networks.

WHEREFORE, we very respectfully request that, in merit of all of the above, this Honorable Court condemn Defendant to the payment of the damages claimed, as well as interests, costs and attorney's fees.

RESPECTFULLY SUBMITTED.

In San Juan, today this 7th day of September 2022.

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