

Houston area.

**A. Overview of Defendants' Defamatory Conduct**

10. Defendants have engaged in an ongoing series of tortious actions that have directly harmed PJS. Their actions include, but are not limited to, sending defamatory faxes to PJS customers, placing defamatory flyers on cars in parking lots belonging to PJS customers, creating and maintaining Internet websites containing defamatory content about PJS, preparing and distributing a defamatory report about PJS, placing a giant inflatable rat labeled "PJS" at the buildings of several of PJS' customers, and otherwise making defamatory statements to persons who have current, pending, and/or reasonably probable future business relationships with PJS.

11. Defendants have intentionally engaged in this wide-range of defamatory activity for the purpose of destroying PJS' reputation and financial position. In fact, Schlademan, acting individually and on behalf of SEIU, has stated directly to PJS that SEIU wants "to kill" PJS.

12. In total, Defendants have published more than 30 separate defamatory publications regarding PJS to PJS' clients and the Houston business community since June 2006. Many of these defamatory publications currently remain posted on the SEIU's websites.

13. Defendants, in a variety of forums, have publicly labeled PJS an "irresponsible cleaning contractor." Defendants have published (and continue to publish) this false accusation on the [www.houstonjanitors.org](http://www.houstonjanitors.org) and [www.facts-online.org/houstonjanitors](http://www.facts-online.org/houstonjanitors), websites created and maintained by SEIU. Defendants have also faxed, mailed, e-mailed, and hand-distributed this false accusation to PJS' customers and other members of the Houston business community to cause PJS' customers to cease doing business with PJS.

14. Defendants, in a variety of non-governmental forums, publicly and falsely have