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CUYAHOGA COUNTY CLERK OF COURTS
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Cleveland, Ohio 44113

Court of Common Pleas

New Case Electronically Filed: COMPLAINT
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By: BRIAN J. GREEN 0063921

Confirmation Nbr. 3583789

RANDY KERTESZ

CV 25 122630

vs.

RAJESH PIDIKITI

Judge: DEBORAH M. TURNER

Pages Filed: 3

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

RANDY KERTESZ)	CASE NO.
c/o Shapero & Green LLC)	
25101 Chagrin Blvd., Suite 220)	
Beachwood, Ohio 44122)	JUDGE
)	
Plaintiff,)	<u>COMPLAINT</u>
)	<i>(Jury Demand Endorsed Hereon)</i>
-vs-)	
)	
RAJESH PIDIKITI)	
495 Crystal Lake Drive)	
Orange, Ohio 44022)	
)	
Defendant.)	

NOW COMES the plaintiff, Randy Kertesz (“Plaintiff”), for his claims against the defendant Rajesh Pidikiti (“Defendant”), and states and avers as follows:

JURISDICTIONAL STATEMENT AND PARTIES

1. Plaintiff is an individual residing in Cuyahoga County, Ohio.
2. Defendant is an individual who owns property and conducts business in Cuyahoga County, Ohio.
3. At all times relevant to this Complaint, the causes of action hereby alleged, accrued in Cuyahoga County, Ohio.

COUNT I
(Defamation Per Se)

4. On October 9, 2024, at a public meeting in Orange Village, Ohio, with numerous attendees

present, Defendant made defamatory statements about Plaintiff as set forth below.

5. Subsequently, on October 25, 2024, the Jewish News published an article in which Defendant was quoted from the October 9, 2024, meeting in Orange Village, at which time he made certain defamatory statements as to Plaintiff as set forth below.
6. Defendant made public knowingly untrue and defamatory statements at which time, he specifically stated in the Orange Village meeting and to the Jewish News that Plaintiff was a “racist” and made “threats of lawsuits”. In fact, Defendant went so far as to say, “The problem is (Kertesz) mostly- I’m an immigrant – he’s a racist.”
7. These defamatory statements were made in order to harm Plaintiff in his individual capacity and in his primary business which is to develop and manage residential and commercial properties.
8. In particular, because Defendant opposed Plaintiff’s handling of Homeowners Association matters in a development in which an entity in which Plaintiff is a member, held interests in several lots, he publicly made the defamatory statements identified above.
9. Defendant’s intent to damage Plaintiff from a business perspective, is further evidence that the abovementioned statements made by Defendant were made with wanton disregard to the truth.
10. As a direct and proximate result of Defendant’s defamatory conduct, Plaintiff suffered injury to his reputation and business operation and is thereby entitled to compensatory and punitive damages and attorney’s fees in excess of \$25,000.00, subject to proof at trial.

WHEREFORE, Plaintiff requests the following relief:

- 1) Compensatory and punitive damages and attorney fees in an amount in excess of

\$25,000.00, to be determined more precisely at trial; and

2.) any other further relief this Court deems just and equitable.

Respectfully submitted,

/s/ **Brian Green**

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JURY DEMAND

Pursuant to the Ohio Rule of Civil Procedure 38, Plaintiff demands a trial by jury on all issues raised in the Complaint.

/s/ **Brian Green**

BRIAN GREEN (0063921)
SHAPERO & GREEN LLC