

IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY MARYLAND

**CONCETTA DEL SIGNORE**

[REDACTED]  
Annapolis, MD 21401

*Plaintiff,*

v.

**ROBERT CLARK**

[REDACTED]  
Annapolis, MD 21401-26331

*Defendant*

C-02-CV-20-001412

Civil Action No.: \_\_\_\_\_

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**COMPLAINT**

COMES NOW, Plaintiff, Concetta Del Signore, by and through her undersigned attorneys, Timothy Maloney, Michael Brown, and Joseph Greenwald and Laake PA, and sues the Defendant, Robert Clark, for cause, claims damages, and states as follows:

**PARTIES**

1. Plaintiff Concetta "Connie" Del Signore is an adult citizen of the United States, and is a resident of Anne Arundel County, Maryland.
2. Defendant Robert Clark is an adult citizen of the United States, and is a resident of Anne Arundel County, Maryland.
3. The principal events giving rise to these causes of action all occurred in Anne Arundel County, Maryland.
4. Venue is appropriate pursuant to Md. Cts. & Jud. Proc. § 6-201(a).

## FACTS

5. Plaintiff is the former President and CEO of Visit Annapolis and Anne Arundel County (“Visit Annapolis”), a preeminent “Destination Marketing” non-profit organization. She held that position from August 2003 until her termination in April of 2020.
6. Ms. Del Signore has over 33 years of experience working in the tourism industry. Before she came to Visit Annapolis, Del Signore served as the President of the Reading & Berks County Visitors Bureau in Pennsylvania, making a name for herself in the Mid-Atlantic tourism community.
7. The mission of Visit Annapolis is to “generate revenues for the local economy by promoting Annapolis and the Chesapeake Bay to leisure and business travelers across the country and around the world.” As President and CEO, it was Del Signore’s responsibility to deliver on that mission.
8. When Del Signore started in 2003, Visit Annapolis was a weak and underfunded tourism marketing agency. Visit Annapolis’ annual budget was approximately one million dollars, a grossly inadequate amount to market tourism to Annapolis. The organization was so underfunded that employees were often not even able to order office supplies or other basic necessities. Del Signore was recruited by Visit Annapolis from a tourism agency in Pennsylvania to come to Maryland and turn things around. She did.
9. Del Signore first began a multiyear advocacy effort to increase the organization’s funding and outreach. Through her leadership, Del Signore was able to build strong relationships with the Maryland General Assembly, and obtained dedicated funding from the lodging tax to finance Visit Annapolis tourism and marketing, without raising taxes on local residents.

10. Starting with an increased lodging tax in 2008, the Visit Annapolis budget saw a seventeen percent (17%) increase in the first three years. As a result of her efforts in obtaining several key pieces of legislation, the funding for Visit Annapolis ultimately increased to almost \$4 million annually.
11. In the past decade, Visit Annapolis flourished. This included: increasing the organizations tourism partnerships from 300 partnerships to 700, increasing website traffic from 200,000 visitors annually to over a million visitors, and assisting the expansion of the new college football bowl game – The Military Bowl, which brought substantial tourism to the community in what is otherwise a “downtime” in the hospitality industry. Through these efforts, and many more, Del Signore’s Visit Annapolis helped revitalize the community’s tourism industry.
12. Ms. Del Signore also revolutionized Annapolis tourism marketing. Before she got to Visit Annapolis, the organization was largely unable to market Annapolis as a tourism destination. This stemmed both from the organization’s meager budget, but also from a lack of expertise. Once Del Signore took over, things quickly changed.
13. During her tenure, Del Signore was able to use her increased budget to launch new advertising campaigns. Some campaigns were regional, including the new marketing deal with the Mid Atlantic Sports Network to advertise during Baltimore Orioles games. Other campaigns ran advertisements across the country, and eventually, even internationally. In fact, starting in 2017, Del Signore launched an extremely successful marketing campaign in Toronto, which led to numerous publications as a result of her efforts.
14. Ms. Del Signore also brought new marketing innovation to Visit Annapolis. Under her leadership, Visit Annapolis began creating and maintaining a host of online blog sites and

began utilizing numerous social media platforms, all of which drastically benefited Visit Annapolis marketing, and in turn, generated tourism. One of Del Signore's innovations was the blog site "Annapolis Discovered", which was designed to attract potential tourists who primarily get their information from online review sites and other social media sources.

15. In addition to her successful fundraising efforts, Del Signore also proved to be a capable and responsible financial manager. Under her tenure, the Visit Annapolis budget was always balanced, and each year the organization was able to put significant resources into its reserve accounts. At the time of her termination, Visit Annapolis' capital reserve account had over a million dollars in the bank.
16. In fact, each year, Visit Annapolis would be audited by a respected private accounting firm, and each time the audits showed that Visit Annapolis was exceptionally managed. In her 2017 performance review, which was written and approved by the board members including Clark, the board found that: "Financially speaking, the annual audit continues to be perfect – 10 years running."
17. Over the last seventeen years, Del Signore built Visit Annapolis into a nationally renowned tourism agency. Through her efforts to obtain funding and innovate, tourism in the community soared, and the agency won numerous awards. Visit Annapolis became one of the flagship destination marketing agencies in the United States.
18. In recognition for her achievements, at the end of each fiscal year, Del Signore received immaculate performance reviews, and the maximum possible performance bonuses afforded to her under her contract.

19. In her 2009-2010 performance review, while the hospitality industry was still reeling from the 2008 financial crisis, Del Signore was specifically commended for her ability meet the challenges of the economic downturn, and was credited for keeping the organization afloat.
20. In her 2012-2013 review, the board specially recognized Del Signore's spirit and determination, and cited her ingenuity in expanding Visit Annapolis' team of professionals and growing budget. Again, she received the maximum discretionary bonus.
21. In her 2016-2017 review, in addition to the glowing remarks as to her financial management, the board, which included Clark, recognized Del Signore as a "sought after leader in the community", and generally cited her tremendous efforts as leader of the organization. Again, she received the near maximum discretionary bonus.
22. Most recently, in her 2018-2019 review, the board, which again included Clark, unanimously agreed that Del Signore had "gone above and beyond expectations" and had exceeded all goals for that year. Again, she received the maximum discretionary bonus.
23. In addition to her internal performance reviews, Del Signore received numerous recognitions from her peers. She became a leader in the region's hospitality and tourism industry. Tourism leaders throughout the country sought her counsel and modeled their programs after Visit Annapolis.
24. In August of 2015, Plaintiff signed a new five (5) year contract with Visit Annapolis, which was set to expire on August 24, 2020. The contract provided initial annual compensation of \$170,281.10, with annual raises not to exceed 5%. The contract also provided for discretionary bonuses ranging from 0% to 8% of her annual salary.
25. Plaintiff's employment contract also set out explicit terms for what benefits she would earn if she completed the full duration of her contract. Specifically, upon completion of the contract,

she was to be provided health insurance for an additional three (3) years. She was also entitled to an annual \$15,000.00 retention bonus upon completing her contract.

26. The contract also contained a Misconduct Clause. Under that clause, any “act of malfeasance” or “criminal misconduct” would result in termination and would permit Visit Annapolis to withhold any benefits that Plaintiff would otherwise be entitled to.
27. Since Plaintiff signed her 2015 contract, she would receive annual performance reviews at the end of each year, which also determined her bonus rate. Each year during the relevant time period, Plaintiff was awarded the full performance bonus. In her most recent 2019 review, Plaintiff was told she went “above and beyond expectations while exceeding the goals outlined in your contract.” As such, she received the maximum bonus permitted under her contract.

#### **Defendant Clark’s Scheme Begins**

28. While Del Signore’s success was widely praised, it also spawned professional jealousy, and more significantly, attempts to poach the resources of Visit Annapolis.
29. Defendant Robert Clark is the President and CEO of “Historic Annapolis”, a local non-profit organization. He has held that position since 2012. In this capacity, Clark is paid \$154,720.00 in annual salary plus benefits.
30. The mission statement of Historic Annapolis is to preserve the architectural legacy of Maryland’s capital city, primarily by preserving and restoring historic buildings throughout Annapolis.
31. During the relevant time period, one of Historic Annapolis’ renovation projects was the restoration of the James Brice House (“Brice House”), home of an acting colonial governor of Maryland. In his capacity as President and CEO of Historic Annapolis, Clark also held a

leadership role on the City Dock Action Committee (“City Dock”), which was tasked with renovating the Annapolis City Dock.

32. In 2016, Clark was elected to the board of Visit Annapolis. A year later, Clark became Chairman of the Board at Visit Annapolis, a position he held until 2019. During his tenure at Visit Annapolis, he maintained his role as President and CEO of Historic Annapolis.
33. Ms. Del Signore worked as President and CEO of Visit Annapolis the entire time Clark was Chairman of the Board.
34. In his capacity as Chairman of the Board, Clark was largely uninvolved in the day to day business of Visit Annapolis. A key responsibility of that position is to attend and facilitate board meetings, and assist the President and CEO of Visit Annapolis in running the organization. Mr. Clark frequently failed to prepare for board meetings, and was generally preoccupied with his work for Historic Annapolis. This left the burden of running the organization and managing board matters on Ms. Del Signore’s shoulders.
35. In his role as both board member and Chairman, Clark was not permitted to divert the organizations funding to other organizations, such as Historic Annapolis. As such, any efforts to do so fell outside the scope of his authority and would have been contrary to the statute authorizing dedicated funding, and the appropriation to Visit Annapolis. It also was a clear conflict-of-interest and unethical for Clark to use his Board position at Visit Annapolis to divert resources to the organization he directed, Historic Annapolis.
36. Despite these legal and ethical issues, Clark persistently undertook efforts to use Visit Annapolis funds and resources to help benefit Historic Annapolis, and in particular Brice House.

37. Shortly after Clark's appointment to the board, Del Signore heard from other community members that Clark's Historic Annapolis projects, including Brice House, were underfunded.
38. At the same time Del Signore began hearing those rumors, Clark began frequently approaching Del Signore attempting to persuade her to divert funds from Visit Annapolis to Historic Annapolis in order to help the Brice House project. On each attempt, Del Signore refused, and would remind Clark that Visit Annapolis's funds are not to be used for his and Historic Annapolis priorities. Ms. Del Signore likewise repeatedly made clear that diverting funds from Visit Annapolis to Historic Annapolis would be unethical and highly improper, and she refused to help him no matter how desperate he was for resources.
39. Clark was undeterred about the legal and ethical implications of his proposed diversions. He believed he was "untouchable." Clark frequently bragged to Del Signore and others about his political connections in the Annapolis Capital newspaper, and that he believed he could do whatever he wanted.
40. Clark also constantly badgered Del Signore about using the organization's resources to construct a brand new and unnecessary office for Visit Annapolis. Upon information and belief, Clark wanted this new office space to use for his work for Historic Annapolis. During the relevant time, Clark's only office was located in the under construction Brice House. Not satisfied with that office, and being unclear about where he would be relocated once the Brice House construction was finished, Clark was hoping to use his influence at Visit Annapolis to construct a new office space that he could use for his Historic Annapolis priorities.
41. Del Signore strongly opposed the construction of a new office for Visit Annapolis. Since Visit Annapolis had already finished a \$1.7 million dollar renovation to their office under her



tenure as President and CEO, this would have been a highly inappropriate and wasteful use of the organization's resources. In response, and acting in Visit Annapolis' best interest, Del Signore refused Clark's countless requests.

42. In addition to his involvement with both Visit Annapolis and Historic Annapolis, Clark also became involved with City Dock. During the relevant time period, Clark led the City Dock efforts to revitalize the location, address coastal flooding, and to fortify the docks infrastructure.

43. At one point during the relevant time period, Clark attempted to use his influence to convince the General Assembly to pass legislation to fund his City Dock project, which would have raised taxes on Visit Annapolis' hospitality partners. Again, in her capacity as President and CEO of Visit Annapolis, Del Signore led opposition of various community stakeholders, which resulted in the failure of Clark's legislation

44. From the time Del Signore thwarted Clark's City Dock funding plan in January 2020, their working relationship effectively ceased. Clark essentially stopped participating in Visit Annapolis Board meetings entirely. He was serving as Immediate Past Chairman, a board member position, at this time.

45. Clark began making it known in the community that he would take steps to remove Del Signore as President and CEO, despite her strong support from the community and the board. Upon information and belief, Clark wanted Del Signore removed so that he could successfully divert funds from Visit Annapolis to his Historic Annapolis and City Dock priorities, and to retaliate against her for her past rejections of his efforts.

46. Finally, after years of being repeatedly rejected by Del Signore, Clark acted, and attempted to remove Del Signore from the leadership of Visit Annapolis. Knowing that Del Signore was a

major obstacle to diverting resources to his own organization, Clark used his board position to construct a false ‘misconduct’ scenario to remove Del Signore, to retaliate against her for her past resistance to his initiatives, and allow him unfettered control over Visit Annapolis.

47. In early April 2020, Del Signore was abruptly notified that she would not be allowed to complete her employment contract, which only had four (4) months left. Vice Chairman of Visit Annapolis Gary Jobson informed Del Signore that she had two choices: a) voluntarily resign or b) be terminated. Prior to this notice, Del Signore had never once been told that there were any issues with her job performance—to the contrary, her performance was repeatedly praised by the board. In fact, in her most recent job performance review, which was approved by both Jobson and Clark, Del Signore was told that she had exceeded all expectations, and she was awarded the maximum bonus and raise permitted under her contract.

48. When Del Signore inquired why this was happening, Jobson falsely accused her of creating a work environment that was tolerant of sexual harassment and being under the influence on the job. Both statements were demonstrably false. The only incident in the workplace occurred in 2020 when two Visit Annapolis employees reported a violation of the organizations sexual conduct policies to Del Signore. The violation concerned a relationship between a senior office employee and a junior employee. Upon learning this information, Del Signore performed an investigation, and put an end to the conduct immediately. Upon information and belief, the senior employee has been actively cooperating with Clark in undermining Del Signore and pushing for her removal.

49. In contrast to Del Signore's adherence to Visit Annapolis' no tolerance sexual harassment policy, prior to becoming Chairman but as a member of the board, Clark himself made sexual passes at Del Signore, which she believed were inappropriate and she rejected.
50. In response to the first call from Jobson, Del Signore requested that she be permitted to retire early. Since she intended to retire at the end of her contract, Del Signore was only four months away from retirement anyways. So, Del Signore begrudgingly agreed to step down and retire, but made clear to Jobson that her contract needed to be honored. This aspect of the agreement was crucial to Del Signore, as her contract afforded her significant compensation and much needed benefits upon retirement, which she worked seventeen years to earn. On this first phone call, Jobson agreed, and told Del Signore her contract would be honored.
51. Shortly after the first phone call, Del Signore got another call from Jobson, however this time, Clark was also on the phone. During this call, Jobson explained that Del Signore would no longer be permitted to retire, she was being terminated under the misconduct clause of her contract, and therefore her contractual benefits were denied.
52. In support of this action, Jobson claimed that he had been informed that Del Signore had misused tens of thousands of dollars, drank during working hours, had created a working environment in which racist and sexist remarks were permitted, and that she inappropriately diverted funds to a family member. None of these statements were true, and in some cases, could be proven demonstrably false by a mere cursory investigation.
53. The source of Jobson's false accusations was Clark. In retaliation for Del Signore's refusal to unethically divert funds from Visit Annapolis to Clark's other projects, and to get Del Signore out of his way to complete those other projects, Clark intentionally and recklessly

reported false statements to Jobson, knowing it would lead to Del Signore's termination under the misconduct clause of her contract.

54. The motive behind Clark's conduct was revenge. In retaliation for Del Signore's repeated rejections of Clark's schemes, Clark wanted to punish Del Signore, and knew that a "misconduct" termination was the perfect solution. Knowing Del Signore was months away from retirement, and that Del Signore's contract provided for generous retirement payouts and benefits, Clark's goal was to create the one scenario where Del Signore's contract could be terminated without any compensation to Del Signore. Unfortunately, to date, Clark's retaliation has been successful.
55. Clark's retaliatory motive is underscored by the retraction of Jobson's original offer to let Del Signore retire early. After the first call between Jobson and Del Signore, Jobson had no issue with Del Signore being permitted to retire early and maintain her contractual benefits. However, once Clark got involved on the second call, that offer was withdrawn. Clearly, Del Signore being removed as President and CEO of Visit Annapolis wasn't enough for Clark. He wanted Del Signore to suffer.
56. While Del Signore strongly enforced Visit Annapolis' no-tolerance sexual harassment policy, Clark was frequently inappropriate with Del Signore and other female employees of Visit Annapolis. Early on in his tenure, Clark asked Del Signore if he could kiss her, disgusted, she refused. Throughout Clark's tenure at Visit Annapolis, Clark was known for making other inappropriate comments or making unwanted physical contact, and used his position of authority to get away with it. Nevertheless, Clark had the effrontery to falsely accuse Del Signore of creating an environment that tolerated harassment.

57. Similarly, the claim that Del Signore improperly diverted funds to a family member is simply untrue. During her tenure, Del Signore created a program of paying small stipends to freelance writers who would write blog posts for the web site extolling the virtues of visiting Annapolis. Several persons wrote very well-received blogs, including Del Signore's sister, a gifted writer, who was paid very small amounts consistent with what all other bloggers were paid for writing very well received blogs. The Board was well aware of this, but used this as one of the pretexts for firing her and breaching her contract. Significantly, after she left, the acting executive director has been making efforts to award the agency's web site contract on a sole source basis to a friend of her husband.

58. Board Chair Jobson wrongly stated that Del Signore had spent agency money without oversight, when all of it was budgeted, audited and known to the board. Ironically, since her departure, a recent final payment of \$22,000 was made payable to someone the organization had never heard of and deposited, resulting in a large potential loss to the organization at a time when it is suffering from financial challenges due to the Covid-19 crisis. The check was approved by the acting executive director and signed by the chairman and treasurer, even though it was made payable to an unknown individual who had nothing to do with the vendor.

59. In an attempt to intimidate her, Del Signore was even told by Jobson, Clark and other members of the board, falsely, that some of her actions were "criminal," and that she should "lawyer up".

60. Knowing that Del Signore was soon to retire anyways, Clark's conduct was malicious and punitive, and done with the specific intention of cutting short her tenure and depriving Del

Signore of her retirement benefits she had worked nearly seventeen years to earn, and retaliating against her consist rejection of his efforts to divert Visit Annapolis Resources.

61. In carrying his malicious scheme, Clark was in no way acting on behalf of Visit Annapolis or its governing board, and rather, was acting in the interests of Historic Annapolis, City Dock, and his own personal, pecuniary and vindictive interests.

### **COUNT I**

#### **(Tortious Interference with a Contract)**

62. Plaintiff restates and incorporates herein by reference the allegations listed in paragraphs 1-61.

63. In 2015, Del Signore signed a new five year employment contract with Visit Annapolis. The contract was set to expire on August 24, 2020. The contract set out in explicit terms what benefits Del Signore would be entitled to upon successful completion of the contract. The contract also contained a misconduct clause, which if triggered, would cause the contract to be terminated, and Del Signore would no longer be owed her retirement benefits.

64. Based on Clark's status as a board member of Visit Annapolis during the relevant time period, he had direct knowledge about the existence of Del Signore's contract with Visit Annapolis. Clark as had knowledge of the contractual terms surrounding a possible retirement as well as the misconduct clause.

65. In his efforts to divert Visit Annapolis funding to other organizations, Clark was never acting within the scope of his authority as a Visit Annapolis board member. Rather, Clark was solely acting as an agent of Historic Annapolis or for City Dock. Further, in attempting to divert Visit Annapolis funding, Clark was also acting for his own personal benefit. In his own decision-making and his efforts to obtain board support to terminate Del Signore's employment and break her employment contract, Clark was not acting in his role as an agent

of Historic Annapolis to obtain greater influence over Visit Annapolis, to move the Visitors Center, and to obtain and divert Visit Annapolis resources for his own organization, and to retaliate for Del Signore's past resistance to these efforts. Clark was not acting in his fiduciary capacity as a board member of Visit Annapolis.

66. In his capacity as a Visit Annapolis board member, Clark did not have the authority to divert funds to other organizations. In fact, the statute that provides for Visit Annapolis lodging tax funding mandates that the tax revenue only be distributed to the Visitors Bureau. Therefore, any of Clark's efforts to divert funds were outside the scope of his authority as a board member of Visit Annapolis.
67. In response to Del Signore's repeated refusal to permit Clark to improperly divert funds from Visit Annapolis to either Historic Annapolis or City Dock, and in retaliation for them, Clark intentionally and willfully fabricated allegations against Del Signore, knowing that these false allegations would trigger the Misconduct Clause in her employment contract, thereby causing her termination.
68. Based on his prior status as Chairman of the Board of Visit Annapolis, Clark was well aware of the specific Misconduct Clause in Del Signore's contract, and knew that only specific allegations of "malfeasance" or "criminal misconduct" would result in Del Signore losing her benefits and compensation she had earned over sixteen years of service.
69. Based on that knowledge, Clark maliciously crafted allegations that would rise to the level of "malfeasance" or "criminal misconduct" with the singular intention of wrongfully interfering with Del Signore's contract. Clark's allegations of misconduct were false, and the Board's contention that it could terminate Del Signore and violate the severance provisions of her

contract were false, and based in large part on Clark's false and malicious statements and conduct.

70. Clark made these intentional and improper statements to Jobson, a third party, which induced Jobson to stop performance on the contract between Del Signore and Visit Annapolis.

71. As a direct result of Clark's intentional, malicious and improper conduct, Jobson and the board of Visit Annapolis did terminate Del Signore in violation of her misconduct clause, falsely alleging misconduct when none occurred. As a further result of Clark's intentional, malicious and improper conduct, the board of Visit Annapolis breached their employment contract with her, refusing to pay the contractually guaranteed benefits to her, including: her remaining salary, her annual \$15,000.00 retention bonus to be paid annually for five years, health insurance benefits, and severance pay. The board's termination of Del Signore and breach of its contractual obligations to her was a direct and proximate result of Clark's malicious action and conduct in defaming del Signore, making false allegations against her, urging the Board to terminate her, and also urging the Board to breach the severance provisions of her contract. All of Clark's conduct in interfering with Del Signore's employment, contractual rights and economic expectations were taken with malice and improper motive, with a desire for retaliation, out of spite, personal rancor and anger toward Del Signore, and out of an improper desire to divert resources and decision making of Visit Annapolis to his own organization.

72. Based on Jobson's non-performance of the contract, which was induced by Clark, Del Signore suffered actual damages, including: the loss of her annual retention bonus, her remaining salary, her health insurance benefits, and her severance pay.



73. As a direct result of Clark's tortious conduct, Del Signore has suffered and will continue to suffer damages, loss to reputation, loss of employment, lost income and benefits, loss of contractual rights, and other consequential damages.
74. In carrying his scheme to interfere with Del Signore's contract, Clark acted with malice and with an improper and evil motive, an intent to injure Del Signore, to punish her for the professional and personal rejections, and put her financial future at risk, to retaliate against her, and to divert resources to his own organization
75. Clark effectuated his scheme employing numerous false statements and misrepresentations, acting in an ultra vires capacity outside his role as board member, and for the improper purposes of his own organization and for himself. All of this conduct intentionally put Del Signore's financial future at risk.
76. The damages sought for Clark's tortious interference with Del Signore's contract exceeds \$75,000.00.

WHEREFORE the plaintiff sues the defendant, demands compensatory damages in excess of \$75,000, demands punitive damages, and attorney's fees and costs, and such other and further relief as the Court deems appropriate.

## **COUNT II**

### **(Tortious Interference with Economic Relations)**

77. Ms. Del Signore restates and incorporates herein by reference the allegations listed in paragraphs 1-76.
78. In response to Del Signore's repeated refusal to permit Clark to improperly divert funds from Visit Annapolis to either Historic Annapolis or City Dock, Clark intentionally and willfully

fabricated allegations against Del Signore, knowing that these false allegations would result in her termination under the Misconduct Clause of her contract.

79. Based on his prior status as Chairman of the Board of Visit Annapolis, Clark was well aware of Del Signore's employment relationship with Visit Annapolis, and knew that only specific allegations of "malfeasance" or "criminal misconduct" would result in Del Signore losing her benefits and compensation she had earned over sixteen years of service.
80. Based on that knowledge, Clark maliciously crafted allegations that would rise to the level of "malfeasance" or "criminal misconduct" with the intention of Del Signore's employment being terminated.
81. Clark made these false statements to Jobson, a third party, with the specific intention of inducing Jobson into terminating Del Signore's employment.
82. Clark's motivation to undertake in this fraudulent and malicious scheme was to advance the interests of Historic Annapolis, City Dock, and his own personal vindictive interests. In carrying out this scheme, Clark was in no way acting to further the interests of Visit Annapolis.
83. In his capacity of board member of Visit Annapolis, Clark was prohibited by statute from diverting any of the organizations funding to other organizations. As such, any of Clark's attempts to divert Visit Annapolis funding fell outside the scope of his authority as a Visit Annapolis board member.
84. Clark was also seeking to divert the Visit Annapolis funding for his own personal benefit, and not for the benefit of Visit Annapolis.

85. Based on Clark's intentional and malicious fraudulent conduct, Del Signore suffered actual damages, including: the loss of her annual retention bonus, her remaining salary, her health insurance benefits, and her severance pay.

86. As a direct result of Clark's false statements, Visit Annapolis and its board of directors were induced into terminating Del Signore's employment. This direct conduct caused Del Signore to suffer actual and consequential damages.

87. In carrying his scheme to interfere with Del Signore's employment relationship, Clark had an evil motive, an intent to injure Del Signore, and effectuated his scheme using numerous frauds. All of this conduct intentionally put Del Signore's financial future at risk.

Consequently, Clark acted with actual malice

88. The damages sought for Clark's tortious interference with del Signore's economic relations exceeds \$75,000.00

WHEREFORE the plaintiff sues the defendant, demands compensatory damages in excess of \$75,000, demands punitive damages, and attorney's fees and costs and such other and further relief as the Court deems appropriate.

#### **REQUEST FOR JURY TRIAL**

The plaintiff demands trial by jury in connection with all counts of her Complaint.

Respectfully submitted,

JOSEPH, GREENWALD & LAAKE, P.A.

/s/

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