

IN THE CIRCUIT COURT OF THE EIGHTH
JUDICIAL CIRCUIT, IN AND FOR ALACHUA COUNTY, FLORIDA

CASE NO. 012026CA000685

JOSHUA GOLDSTEIN,

Plaintiff,

v.

HYATT HOTELS CORPORATION
and MEGAN GIDEON,

Defendants.
_____ /

AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, JOSHUA GOLDSTEIN, by and through his undersigned attorney, files this Amended Complaint and sues Defendants, HYATT HOTELS CORPORATION (“HYATT”) AND MEGAN GIDEON, and alleges:

JURISDICTION AND VENUE

1. This is an action for damages in excess of this Court’s jurisdictional limits, to wit: \$50,000.00, exclusive of interest, attorneys’ fees and costs.
2. Plaintiff, JOSHUA GOLDSTEIN, is an individual over the age of eighteen that at all relevant times was a resident of Palm Beach County, Florida.
3. Defendant, HYATT HOTELS CORPORATION, is a corporation established under the laws of the State of Delaware, which at all times relevant hereto is and was actively engaged in substantial business in the State of Florida.
4. Defendant, MEGAN GIDEON, is an individual over the age of eighteen that at all relevant times was a resident of Alachua County, Florida.

5. Jurisdiction and venue are proper with this Court as the incident which forms the basis of this Amended Complaint transpired in Alachua County, Florida.

GENERAL ALLEGATIONS

Plaintiff re-alleges and re-avers Paragraphs 1 through 5, as though fully set forth herein, and would further state:

6. At all times material hereto, Plaintiff, JOSHUA GOLDSTEIN, was a reality television star from the hit show Love Island, as well as a social media influencer, business owner, fitness instructor, content creator, and brand ambassador.

7. At all times material hereto, Plaintiff, JOSHUA GOLDSTEIN, had a significant online presence in the range of 500,000 followers on Instagram, resulting from his celebrity as a star on a top television show.

8. From February 21, 2025 to February 23, 2025, Plaintiff was a paying customer and business invitee of the Hyatt Place Gainesville Downtown Hotel (“Hotel”), located at 212 SE 1st Street, Gainesville, Florida 32601. At all times material hereto, Defendant, MEGAN GIDEON, was a manager and/or the manager of the Hotel.

9. On February 25, 2025, Plaintiff’s ex-girlfriend, a woman named Brianna Lombardo, called the Hyatt Place Gainesville Downtown Hotel and spoke to Defendant, HYATT’s, employee and/or agent and/or Manager MEGAN GIDEON. Brianna Lombardo pretended to be Plaintiff’s sister on the phone and expressed that she was concerned about Plaintiff’s whereabouts.

10. Plaintiff’s sister, Lindsey Beth Goldstein, tragically passed away unexpectedly in 2021, and this fact was known to Brianna Lombardo.

11. Defendant, HYATT's, employee and/or agent failed to request verifying information from Brianna Lombardo and failed to conduct any due diligence whatsoever to confirm her actual identity.

12. Without any identity verification and without any permission or authority from Plaintiff, Defendant, HYATT's, employee and/or agent released personal, private, sensitive, and confidential information to Brianna Lombardo about Plaintiff's recent stay.

13. At all times material hereto, Defendant, HYATT's, employee and/or agent was acting in the course and scope of employment and/or an agency relationship existed between the employee and Defendant, HYATT, because (1) acknowledgement by Defendant, HYATT, that employee would act on its behalf in service of the Hotel; (2) acceptance by the employee of the undertaking of working for Defendant, HYATT, in service of the Hotel; and (3) control by Defendant, HYATT, over the employee's actions.

14. Defendant, HYATT's, employee and/or agent released information via telephone and email to Brianna Lombardo, including, but not limited to, specific date and time-stamped information regarding Plaintiff's actions, including his coming and going from the Hyatt Place Gainesville Downtown Hotel.

15. Upon information and belief, Defendant, HYATT's, employee and/or agent was viewing surveillance footage of Plaintiff from the evening of February 22, 2025, and/or early morning of February 23, 2025, and describing his every move to Brianna Lombardo over the telephone.

16. Based on her past conduct and upon information and belief, Brianna Lombardo was stalking Plaintiff, and Defendant, HYATT's, employee and/or agent and/or Manager MEGAN GIDEON released personal, private, sensitive, and confidential information to this individual.

17. At all times material hereto, Brianna Lombardo used the private, sensitive, and confidential information to spread false information about Plaintiff and to ruin Plaintiff's reputation.

18. An innkeeper has a special relationship with its guests, which would extend to protecting the privacy of information learned during a guest's stay. Therefore, it was foreseeable that Defendant, HYATT, and Manager MEGAN GIDEON releasing this information would lead to embarrassment, harassment, and mental and physical damages.

19. Brianna Lombardo used the information received from Defendant, HYATT's, employee and/or agent and/or Manager MEGAN GIDEON to send electronic communications and/or text messages to his friends, family members, business associates, and business mentor.

20. Brianna Lombardo used the information received from the Defendant, HYATT's, employee and/or agent and/or Manager MEGAN GIDEON to post about Plaintiff on social media platforms, including Facebook and Instagram, and generally on the internet.

21. Brianna Lombardo used the information received from the Defendant, HYATT's, employee and/or agent and/or Manager MEAGAN GIDEON to send Plaintiff text messages that were violent and derogatory.

22. As a result of the spread of this information, Plaintiff began to lose business opportunities and experienced immediate reputational damage. For example, Plaintiff lost support from his business partner in scaling his vitamin and supplement business. Further, Plaintiff's dealings fell through with a business relationship that he was working on with apparel company Comfrt, which resulted in Comfrt ceasing payments to Plaintiff of roughly \$4,000 per month. Additionally, Plaintiff lost his business relationship with apparel company TLF Apparel. Plaintiff's personal training and wellness business was also severely impacted.

23. Because of the release of the personal, private, sensitive, and confidential information to Brianna Lombardo by the Defendant, HYATT's, employee and/or agent and/or Manager MEGAN GIDEON, Plaintiff sought restraining orders against her in Palm Beach County and Miami Dade County.

24. Because of the release of the personal, private, sensitive, and confidential information to Brianna Lombardo by the Defendant, HYATT's, employee and/or agent and/or Manager MEGAN GIDEON, Plaintiff commenced psychotherapy on or about March 1, 2025.

COUNT I – NEGLIGENCE AGAINST HYATT

Plaintiff re-alleges and re-avers Paragraphs 1 through 24, as though fully set forth herein, and would further state:

25. Defendant, HYATT, owed a duty of care to Plaintiff to safeguard and keep private his presence, room assignment, whereabouts and other sensitive information. This was particularly important, in light of the fact that Plaintiff had a public-facing career where his image and likeness was subject to exploitation by bad actors.

26. Defendant, HYATT, breached its duty of care to Plaintiff by:

- a. Disclosing Plaintiff's private information to an unauthorized person;
- b. Failing to implement or enforce privacy safeguards;
- c. Failing to train and/or supervise the employee on privacy, security and confidentiality of guest information;
- d. Failing to protect Plaintiff from foreseeable third-party misconduct.

27. Defendant, HYATT's, disclosure of this private information was outside any legitimate hotel business purpose, and it violated hotel policy, industry standards, and basic hotel-guest privacy expectations.

28. Defendant, HYATT, knew or should have known that unauthorized disclosure of a guest's whereabouts creates a foreseeable risk of harm, including, but not limited to, stalking, harassment, reputational damage, and economic damages.

29. As a direct and proximate result of Defendant, HYATT's, breach of the duty of care Plaintiff suffered damages.

WHEREFORE, Plaintiff, JOSHUA GOLDSTEIN, demands judgment against Defendant, HYATT HOTELS CORPORATION, for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of costs and post-judgment interest, and also demands costs and pre-judgment interest, if any, and demands trial by jury of all issues so triable as a matter of right by a jury.

COUNT II – INVASION OF PRIVACY AGAINST HYATT

Plaintiff re-alleges and re-avers Paragraphs 1 through 24, as though fully set forth herein, and would further state:

30. Plaintiff had a reasonable expectation of privacy in his hotel stay and whereabouts.

31. Defendant, HYATT, made a public disclosure of private facts when its employee and/or agent disclosed the whereabouts and/or private information about Plaintiff to an unauthorized third-person. The HYATT employee and/or agent published the private information related to Plaintiff's whereabouts within the hotel and description of his activity within the hotel by way of disclosing those private facts to Brianna Lombardo who was in no way authorized to obtain private information about any aspect of Plaintiff's hotel stay. The information was private in nature in that only HYATT, its employees, and/or agents had access to the information through the surveillance system, computer system for monitoring guest whereabouts, and/or any other technology used to track guests. Information about Plaintiff's presence or absence at the hotel,

movements within the hotel, who he was with, and surveillance footage is private, and Plaintiff never consented in any manner to that information being released. Brianna Lombardo and the vast audience that ultimately had access to the private facts and information about Plaintiff would never have had access to it but for HYATT's employee and/or agent electing to disclose the private facts and information.

32. A reasonable person would find Defendant, HYATT's, disclosure of the private facts about Plaintiff's whereabouts, location, and movement within the hotel to be objectionable and offensive. Plaintiff expected privacy and safety within the hotel, and it is offensive that HYATT's employee and/or agent disclosed private facts about Plaintiff and him being present in the hotel with other women. A reasonable person would find it offensive that private facts and information about his/her respective hotel stay could be released to an unauthorized person at any time. HYATT's disclosure of private facts here gave unauthorized individuals knowledge and information they never would have had absent the improper disclosure.

33. At the time that Defendant, HYATT, made the public disclosure of Plaintiff's private facts, it knew or should have known of the substantial certainty of it becoming public knowledge based on Plaintiff's celebrity and high profile. The private facts about Plaintiff's movements, whereabouts, and who he was with in the hotel were and are not of public concern. To find that any fact about any celebrity or high-profile individual is always of public concern would strip an entire population of individuals of their privacy rights. Brianna Lombardo contacted the hotel to obtain this information about Plaintiff's stay and him being with other women in the hotel and disseminated it, upon information and belief, via text messages to a broad audience, phone calls to a broad audience, and via Social Media platforms such as Facebook and Instagram that reach thousands of people. Brianna Lombardo made posts about Plaintiff "cheating" to

Facebook Group(s) of women that are designed to invite comment and the further spread of information. The reach of Social Media is even more significant for someone of Plaintiff's celebrity and popularity, practically ensuring that content published online will reach thousands of people.

34. Defendant, HYATT's disclosure of the private facts and information resulted in damages, including, but not limited to, reputational injury and economic damages.

35. Defendant, HYATT, is vicariously liable for the acts of its employees and/or agents.

WHEREFORE, Plaintiff, JOSHUA GOLDSTEIN, demands judgment against Defendant, HYATT HOTELS CORPORATION, for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of costs and post-judgment interest, and also demands costs and pre-judgment interest, if any, and demands trial by jury of all issues so triable as a matter of right by a jury.

COUNT III – NEGLIGENCE AGAINST MANAGER MEGAN GIDEON

Plaintiff re-alleges and re-avers Paragraphs 1 through 24, as though fully set forth herein, and would further state:

36. Defendant, MEGAN GIDEON, owed a duty of care to Plaintiff to safeguard and keep private his presence, room assignment, whereabouts and other sensitive information. This was particularly important, in light of the fact that Plaintiff had a public-facing career where his image and likeness was subject to exploitation by bad actors.

37. As a manager of Defendant, HYATT, Manager MEAGAN GIDEON had within the scope of her job function to ensure that policies, procedures, and training tools were in place for employees to protect guest's private information and to ensure that they were doing so.

38. As a manager of Defendant, HYATT, Manager MEGAN GIDEON had within the scope of her job function to ensure employees were being properly supervised and to ensure they were taking reasonable steps to protect private guest information.

39. Defendant, MEGAN GIDEON, breached her duty of care to Plaintiff by:

- a. Disclosing Plaintiff's private information to an unauthorized person;
- b. Failing to implement or enforce privacy safeguards;
- c. Failing to train and/or supervise the employee on privacy, security and confidentiality of guest information;
- d. Failing to protect Plaintiff from foreseeable third-party misconduct.

40. Defendant, MEGAN GIDEON's, disclosure of this private information was outside any legitimate hotel business purpose and it violated hotel policy, industry standards, and basic hotel-guest privacy expectations.

41. Defendant, MEGAN GIDEON, knew or should have known that unauthorized disclosure of a celebrity guest's whereabouts creates a foreseeable risk of harm, including, but not limited to, stalking, harassment, reputational damage, and economic damages.

42. As a direct and proximate result of Defendant, MEGAN GIDEON's, breach of the duty of care and failure to perform her job functions, Plaintiff suffered damages.

WHEREFORE, Plaintiff, JOSHUA GOLDSTEIN, demands judgment against Defendant, MEGAN GIDEON, for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of costs and post-judgment interest, and also demands costs and pre-judgment interest, if any, and demands trial by jury of all issues so triable as a matter of right by a jury.

COUNT IV – INVASION OF PRIVACY AGAINST MANAGER MEGAN GIDEON

Plaintiff re-alleges and re-avers Paragraphs 1 through 24, as though fully set forth herein, and would further state:

43. Plaintiff had a reasonable expectation of privacy in his hotel stay and whereabouts.

44. Defendant, MEGAN GIDEON, made a public disclosure of private facts when either she, her employees, and/or agents disclosed the whereabouts and/or private information about Plaintiff to an unauthorized third-person. MEGAN GIDEON, her employee, and/or agent published the private information related to Plaintiff's whereabouts within the hotel and description of his activity within the hotel by way of disclosing those private facts to Brianna Lombardo who was in no way authorized to obtain private information about any aspect of Plaintiff's hotel stay. The information was private in nature in that only MEGAN GIDEON, her employees, and/or agents had access to the information through the surveillance system, computer system for monitoring guest whereabouts, and/or any other technology used to track guests. Information about Plaintiff's presence or absence at the hotel, movements within the hotel, who he was with, and surveillance footage is private, and Plaintiff never consented in any manner to that information being released. Brianna Lombardo and the vast audience that ultimately had access to the private facts and information about Plaintiff would never have had access to it but for HYATT's employee and/or agent electing to disclose the private facts and information.

45. A reasonable person would find Defendant, MEGAN GIDEON's, disclosure of the private facts about whereabouts, location, and movement within the hotel to be objectionable and offensive Plaintiff expected privacy and safety within the hotel, and it is offensive that MEGAN GIDEON, her employees, and/or agents disclosed private facts about Plaintiff's activity within the hotel and him being present with other women. A reasonable person would find it offensive that

private facts and information about a respective hotel stay could be released to an unauthorized person at any time. MEGAN GIDEON's disclosure of private facts here gave unauthorized individuals knowledge and information they never would have had absent the improper disclosure.

46. At the time that Defendant, MEGAN GIDEON, made the public disclosure of Plaintiff's private facts, she knew or should have known of the substantial certainty of it becoming public knowledge based on Plaintiff's celebrity and high profile. The private facts about Plaintiff's movements, whereabouts, and who he was with in the hotel were and are not of public concern. To find that any fact about any celebrity or high-profile individual is always of public concern would strip an entire population of individuals of their privacy rights. Brianna Lombardo contacted the hotel to obtain this information about Plaintiff's stay and him being with other women in the hotel and disseminated it, upon information and belief, via text messages to a broad audience, phone calls to a broad audience, and via Social Media platforms such as Facebook and Instagram that reach thousands of people. Brianna Lombardo made posts about Plaintiff "cheating" to Facebook Group(s) of women that are designed to invite comment and the further spread of information. The reach of Social Media is even more significant for someone of Plaintiff's celebrity and popularity, practically ensuring that content published online will reach thousands of people.

47. Defendant, MEGAN GIDEON's, disclosure of the private facts and information resulted in damages, including, but not limited to, reputational injury and economic damages.

48. Defendant, MEGAN GIDEON, is vicariously liable for the acts of her employees and/or agents.

WHEREFORE, Plaintiff, JOSHUA GOLDSTEIN, demands judgment against Defendant, MEGAN GIDEON, for damages in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of

costs and post-judgment interest, and also demands costs and pre-judgment interest, if any, and demands trial by jury of all issues so triable as a matter of right by a jury.

DEMAND FOR JURY TRIAL

Plaintiff, JOSHUA GOLDSTEIN, as a matter of right, demands a trial by jury on all issues so triable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed electronically via Florida Court's E-filing Portal this 27th day of May 2026 to: Lydia J. Henderson, Esq., Carr Allison, 200 W. Forsyth Street, Suite 600, Jacksonville, FL 32202. E-mail: asausaman@carrallison.com, lhenderson@carrallison.com, bbanks@carrallison.com, egaskill@carrallison.com.

LESSER, LANDY, SMITH & SIEGEL, PLLC
Attorneys for Plaintiff(s)
420 Columbia Drive Ste. 110
West Palm Beach, FL 33409
Telephone: (561) 655-2028
Facsimile: (561) 655-2033
/s/ Ryan M. McCarthy
Ryan M. McCarthy, Esq.
FL Bar No.: 105373
E-Mail: RMcCarthy@lesserlawfirm.com
dholloway@lesserlawfirm.com