

Kelly / Warner, PLLC.  
8283 N. Hayden Road, Suite 229  
Scottsdale, Arizona 85258  
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*Attorneys for Plaintiff*

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
7 **IN AND FOR THE COUNTY OF MARICOPA**

8 GIL D. COHEN, an individual,  
9  
10 Plaintiff,  
11 v.

NO. CV2015-002017

**AMENDED STIPULATED ORDER  
FOR PERMANENT INJUNCTION**

12 ROBERT SMITH; JOHN DOES I-X; JANE  
13 DOES I-X; ABC PARTNERSHIPS I-X; DEF  
14 LIMITED LIABILITY COMPANIES I-X; and  
XYZ CORPORATIONS I-X,  
15  
16 Defendants.

17  
18 Pursuant to stipulation of the Parties, and good cause appearing therefore, IT IS  
19 ORDERED, ADJUDGED AND DECREED that:

20 1. Plaintiff is awarded a permanent injunction against Robert Smith  
21 (“Defendant”) enjoining Defendant from publishing false and defamatory statements  
22 concerning Plaintiff;

23  
24 2. Defendant and/or Defendant’s agents, affiliates, and/or other  
25 person/entity assisting or enabling Defendant’s publication of the below-referenced  
26 Content (collectively “Defendant’s Agents”), shall immediately remove from all  
27 websites, search engines, forums, blogs, lists, social media sites, and/or other forums  
28

1 of mass communication (collectively "Forums"), all negative statements, material,  
2 and/or information pertaining to Plaintiff and/or any agent/affiliate thereof (the  
3 "Content"), including, but not limited to, the Content located at the following uniform  
4 resource locators ("URLs") (which has been attached to Exhibit "A" and Exhibit "B"  
5 hereto) and/or any variations thereof, as well as any search terms and/or URLs that  
6 are related, directly or indirectly, or would be reasonably calculated to lead, to the  
7 Content or any of the following URLs:  
8

9 [http://www.ripoffreport.com/r/Gil-D-Cohen-Cypress-Financial-Group-](http://www.ripoffreport.com/r/Gil-D-Cohen-Cypress-Financial-Group-MetLife/internet/Gil-D-Cohen-Cypress-Financial-Group-MetLife-Gil-Cohen-Gil-Daniel-Cohen-CorruptUntrus-991323)  
10 [MetLife/internet/Gil-D-Cohen-Cypress-Financial-Group-MetLife-Gil-Cohen-Gil-](http://www.ripoffreport.com/r/Gil-D-Cohen-Cypress-Financial-Group-MetLife-Gil-Cohen-Gil-Daniel-Cohen-CorruptUntrus-991323)  
11 [Daniel-Cohen-CorruptUntrus-991323](http://www.ripoffreport.com/r/Gil-D-Cohen-Cypress-Financial-Group-MetLife-Gil-Cohen-Gil-Daniel-Cohen-CorruptUntrus-991323)  
12 [http://www.ripoffreport.com/r/gil-cohen-at-metlife/coral-gables-florida-](http://www.ripoffreport.com/r/gil-cohen-at-metlife/coral-gables-florida-33134/gil-cohen-at-metlife-lying-greedy-deceitfulcrooked-managing-director-at-metlife-coral-1000273)  
13 [33134/gil-cohen-at-metlife-lying-greedy-deceitfulcrooked-managing-](http://www.ripoffreport.com/r/gil-cohen-at-metlife/coral-gables-florida-33134/gil-cohen-at-metlife-lying-greedy-deceitfulcrooked-managing-director-at-metlife-coral-1000273)  
14 [director-at-metlife-coral-1000273](http://www.ripoffreport.com/r/gil-cohen-at-metlife/coral-gables-florida-33134/gil-cohen-at-metlife-lying-greedy-deceitfulcrooked-managing-director-at-metlife-coral-1000273)  
15

16  
17 3. Defendant admits that the statements made on the URL are false and  
18 defamatory. Specifically the following statements are false and defamatory: Plaintiff  
19 "is a lying deceptive manager and agent", "abuses his employees", steals money from  
20 his business to "fund his addiction to prostitutes and cars", killed someone, "destroyed  
21 the office in Miami", "Giant liar and has deceived so many", "take agency money to go  
22 to dinners and rent town cars", "withholds employee payouts and keeps manager  
23 bonuses", "slept his way to the top", "goes to strip clubs for lunch", and "destroys  
24 anyone in his path", is a "seriously bad manager", "mismanages money", is  
25 "untrustworthy", "conniving", "screwed people over", and the implication that Plaintiff is  
26 a criminal or unfit to work in the financial industry.  
27  
28

1           4. Defendant and/or Defendant's Agents shall immediately remove from all  
2 Forums any and all Content, references to the Content, partial references to the  
3 Content, and/or references to partial Content, including, but not limited to, indexing  
4 URLs, index pages, subpages, inner pages, headers, headings, title tags, H1 tags,  
5 meta tags, deep links, navigation menus, footers, filenames, ALT text parameters,  
6 structured data, semantic data, images, PDFs, slideshows, multimedia files, and  
7 search suggestions;  
8

9           5. As it is foreseeable that the above-referenced URLs and/or Content will  
10 be referenced on additional webpages in the future (as a result of indexing, re-  
11 indexing, directory development, search result pages, etc.), Defendant and/or  
12 Defendant's Agents shall immediately take all actions, including requesting removal  
13 from all Internet search engines, including, but not limited to, Google, Yahoo!, and  
14 Bing, to remove all such webpages from the Internet;  
15

16           6. To the extent Defendant and/or Defendant's Agents are unable to remove  
17 any Content from any Forum, Defendant and/or Defendant's Agents shall immediately  
18 take all reasonable actions requested by Plaintiff to assist Plaintiff in removing such  
19 Content and/or having the Content rendered unsearchable;  
20

21           7. Defendant and/or Defendant's Agents shall not post any Content,  
22 defamatory or negative material or information about Plaintiff and/or any agent/affiliate  
23 thereof on any Forum;  
24

25 ///

26 ///

27 ///

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Scottsdale, Arizona 85258  
Telephone: (480) 331-9397

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8. Defendant and/or Defendant's Agents shall not publish (orally in writing) any Content, defamatory or negative material or information about Plaintiff and/or any agent/affiliate thereof to any third party; and

9. The Court shall retain jurisdiction to the extent it is necessary to amend this order.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
The Honorable Colleen L. French,  
Judge Pro Tem  
Maricopa County Superior Court


**APPROVED AS TO  
FORM AND CONTENT**

Dated this 11 day of July, 2015.

  
\_\_\_\_\_  
Robert Smith  
Wealthcare India  
228-D, Pocket-F, GTB Enclave,  
Delhi-110093, India  
*Pro Per Defendant*

Dated this 13 day of July, 2015.

**KELLY / WARNER, PLLC**

  
\_\_\_\_\_  
Aaron M. Kelly, Esq.  
8283 N. Hayden Rd., Suite 229  
Scottsdale, Arizona 85258  
*Attorney for Plaintiff*

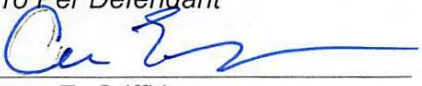
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**COPY** of the foregoing filed electronically on this same date with the Clerk of the Superior Court.

**COPY** of the foregoing sent Mailed on this same date to:

Robert Smith  
Wealthcare India  
228-D, Pocket-F, GTB Enclave,  
Delhi-110093, India  
*Pro Per Defendant*

  
\_\_\_\_\_  
Anne E. Griffith

# **EXHIBIT A**

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Report: #991323

## Complaint Review: Gil D. Cohen- Cypress Financial Group - MetLife

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[Headway Management Group](#)  
Another company that won't tell you about the job UNTIL you go there Woburn MA Massachusetts

[Goujon Group Property Management Company keeps deposit Las Vegas Nevada](#)

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[Green Dot Money Card Will not issue a timely refund Pasadena California](#)

[Exceed liustioned.com Do NOT TRUST RANDY COHEN Internet](#)

[Bacchus Global Financial Service Ruby Bacchus SCAM COMPANY Sacramento California](#)

[Environmental Testing Group MI&T - Mold Inspection & Testing Nationwide Mold Inspection Company MI&T fails to pay workers, takes money from consumer and doesnt pay Nationwide](#)

[WFG WORLD FINANCE GROUP/AEGON/TRANSAMERICA WFG IS A SCAM. I LET THEM RECRUIT ME TO FIND OUT WHAT ALL THE COMPLAINT WERE ALL ABOUT. Glendale Nationwide](#)

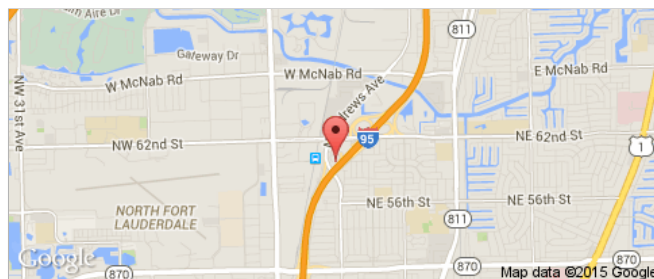
[Cameo school of beauty Saving I was covered by financial aid one month before graduation they told me I had to pay an Large amount before I could get my license Murray Utah](#)

[Profrancorp of Orlando, Florida, USA, Ken M. Hollowell, CEO A potential investment scam, Orlando Internet](#)

**Submitted:** Fri, January 04, 2013 **Updated:** Fri, February 22, 2013  
**Reported By:** DisgustedbyGilCohen — United States of America

**Gil D. Cohen- Cypress Financial Group - MetLife**  
5900 N Andrews Avenue Fort Lauderdale, FL 33309  
Internet  
United States of America

**Phone:**  
**Web:**  
[www.cypressfinancialgroup.com](http://www.cypressfinancialgroup.com)  
**Category:** [Insurance Agencies](#)

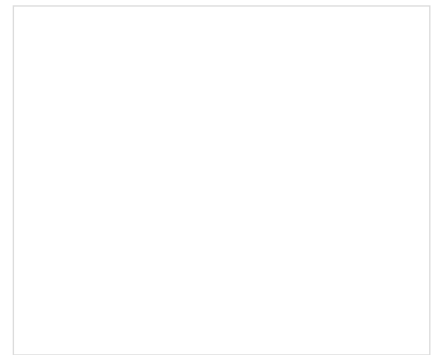


### Gil D. Cohen- Cypress Financial Group - MetLife Gil Cohen, Gil Daniel Cohen Corrupt, Untrustworthy, Deceptive MetLife Manager Internet

- \*Consumer Comment: [When will MetLife wake up?](#)
- \*REBUTTAL [Owner of company: Disgruntled employees](#)
- \*Consumer Comment: [Rebuttal to "ridiculous" report](#)
- \*Consumer Comment: [Totally Ridiculous!](#)
- \*Consumer Comment: [Ridiculous report by disgruntled terminated employees](#)
- \*Consumer Comment: [Ridiculous report by disgruntled terminated employees](#)

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- File New Report
- Repair Your Reputation



Bill O'Reilly Fox News inaccurate statements about Ripoff Report

\*UPDATE January 1, 2015 INVESTIGATION UPDATE

Sac County DA Ben Smith Fails to identify false statements, fails to support accusations w/ clarifications vague sloppy misleading.

Prosecutorial Misconduct

July 13, 2014: Ripoff Report LAUNCHES FULL INVESTIGATION!!!



Ben Smith Sac County Iowa Attorney prosecutorial misconduct, improper relationship with star witnesses, allowing witnesses to knowingly lie. Tracey Richter Roberts falsely convicted, overwhelming evidence leads to estranged husband Michael Roberts, Rexxfield failed polygraph, witness intimidation, evidence tampering. Iowa Division of Criminal Investigation corruption.



Free Tracy Richter

A Son's Plea: "We are humbly asking for your help in our quest for justice for my mother, Tracey Richter. She was falsely convicted of murder in 2011 for defending her family in a house invasion that occurred in 2001."

The New "Digital Extortion" Is there a Ripoff Report on you?



Reputation Management SEO WARNING! They might contact you next!



Gil Cohen is a lying deceptive manager and agent. He abuses his employees and agents and keeps money from the company to fund his addiction to prostitutes and cars. I witnessed Gil and his team of "managers" take agency money to go to dinners and rent town cars. Gil withholds employee payout and keeps his managers bonuses. He won't even let his staff take vacation time. I was scared to death of losing my job when I worked for him. Gil slept his way to the top. He was given the agency by, then President, Lisa Weber. Once he got what he wanted out of her, he dumped her, for a 23 year old. I once witnessed him and his partner, Ghias Ali, walk into a strip club for a "company meeting" I mean, I don't even go to the clubs for lunch! He's only out for himself and will stop at nothing to destroy anyone in his path.

Report Attachments:



This report was posted on Ripoff Report on 01/04/2013 01:35 PM and is a permanent record located here: http://www.ripoffreport.com/r/Gil-D-Cohen-Cypress-Financial-Group-MetLife/Internet/Gil-D-Cohen-Cypress-Financial-Group-MetLife-Gil-Cohen-Gil-Daniel-Cohen-CorruptUntrus-991323. The posting time indicated is Arizona local time. Arizona does not observe daylight savings so the post time may be Mountain or Pacific depending on the time of year.

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Click Here to read other Ripoff Reports on Gil D. Cohen- Cypress Financial Group - MetLife

Search for additional reports

If you would like to see more Rip-off Reports on this company/individual, search here:

Search bar with text: Gil D. Cohen- Cypress Financial Group - MetLife Search Search Tips

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Respond to this report!

File a Rebuttal

Also a victim?

File a Report

Repair Your Reputation!

Get Started

Arbitrate

Remove Reports?

No! Better yet! Arbitrate to set the record straight!

REBUTTALS & REPLIES:

Updates & Rebuttals

0 Author 5 Consumer 1 Employee/Owner

#1 Consumer Comment

When will MetLife wake up?

AUTHOR: Anonymous - (United States of America)

SUBMITTED: Friday, February 22, 2013

When will MetLife wake up? Gil Cohen is seriously a bad manager and a bad human being. How much more has to take place before this guy is gone?

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[Power Places Tours Power Places Tours Ethics Scandal with Gregg Braden / Deposit Payments Scam Boulder Colorado](#)



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[Triple A tile coping & plastering Problems with Product/ Service tile, coping & plaster dallas Texas](#)



[Joseph Clair Koch Lies, writes bad checks lake oswego Oregon](#)



[Unfair, Unethical and unacceptable business practices and opinions by all partners and leadership at BLUE MOON](#)

[leadership at BLUE MOON](#)

**Respond to this report!** [File a Rebuttal](#)

**#2 REBUTTAL** Owner of company

## Disgruntled employees

AUTHOR: Gil - (United States of America)

SUBMITTED: Friday, February 22, 2013

Perhaps if you had put more of our money back into our agency and not paid yourself such an gigantic paycheck and not bought a car a month and worked from time to time you wouldn't have so many disgruntled employees. That is a plural word. I can not believe what a good company do to protect a bad manager. Open your eyes and see what you have done.

**Respond to this report!** [File a Rebuttal](#)

**#3** Consumer Comment

## Rebuttal to "ridiculous" report

AUTHOR: Anonymous - (United States of America)

SUBMITTED: Thursday, February 14, 2013

The original Ripoff report is far from ridiculous. In fact, Gil Cohen is worse than even mentioned. He must be the author of "ridiculous" himself because he is notorious in the industry to be untrustworthy, conniving and heartless.

His terrible reputation in the industry goes way beyond MetLife. I can say this being neither a disgruntled or terminated employee. It is merely the Gods honest truth. He would stab his own mother in the back if it benefited him financially.

Gil can try to make this report go away, but he has srewed over way too many people and is HATED by many

**Respond to this report!** [File a Rebuttal](#)

**#4** Consumer Comment

## Totally Ridiculous!

AUTHOR: Anonymous - (United States of America)

SUBMITTED: Wednesday, February 13, 2013

You forgot to mention that Gil used to be a circus performer in his teenage years and was often seen with clown dancers and it was rumored that he was in a love triangle with The Bearded Lady and a Billy Goat. This period was followed by a quick stint as a brain surgeon however suing himself when he accidentally removed his own brain. Unfortunately this sent him into a dark period when he married a monkey in Malaysia but left her when he was abducted by aliens. I know Gil and nothing in the report is accurate. I would totally trust him with my money, however not to operate on my brain. The author of this report should however since clearly he is suffering from brain damage! Wow this is not right but so easy!

**Respond to this report!** [File a Rebuttal](#)

**#5** Consumer Comment

## Ridiculous report by disgruntled terminated employees

AUTHOR: Anonymous - (United States of America)

SUBMITTED: Wednesday, February 13, 2013

I just read the following statements and it is one of the most ridiculous claims I have read. Someone that took the time to write such false and ludicrous claims about Gil Cohen and the organization must be someone that was either terminated by the company or has enough time on their hands to come up with absolute lies.

Ive dealt with Gil Cohen and his organization for many years and always hear nothing but praises from associates, colleagues, and partners in the community. Gil is committed to giving back to South Florida. He has been awarded various community awards for his strong leadership and community involvement.



[RECRUITING JESSICA FUNKHOUSER DAVIS](#)  
[DAYNE J ANDERSON](#)  
[TARA ANDERSON](#)  
[WAYNE DAVIS](#)  
[DOROTHY DAVIS](#)  
 Worked for company nearly 300 hours, probably more and partners of company wont pay my invoice for the work... LEWISVILLE Texas



[Joe Minas](#)  
[Paqsisihan Joe Minas](#)  
[J.A. Motors](#)  
[Jay Paqsisihan Joe Minas](#)  
 Paqsisihan is a Con-Man and Pathological Liar San Diego California



[Uzrad Lew](#)  
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[Criminal](#)  
[Uzrad Lew](#)  
 Lew is a walking free criminal. Uzrad Lew Con artist who never got caught yet. Los Angeles California



[payment services](#)  
[international po box 17 varsity lakes qld 4227 Australia](#)

was sent a pink paper from this company saying that my name was selected as a GUARANTEED PRIZE CANDIDATE for \$180,000,000.00 and wants me to send them \$10.00 to receive my gift or money. I have not sent them any money cause of looking them up online and seen this. I think that being they are trying to scam others and myself, then someone needs to set up a lawsuit against these people and make them pay ALL the money that they said we have won. varsity lakes Qld Australia



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[SKINSERUM](#)

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[brooklyn4.info / 421 Seventh Avenue, New York, NY 10001](#) Scam Alert \*\* Modesto Esterlin Martinez Con Man New York New York



[Damian Glover](#) -Iris International Damian Glover owes me thousands in investment funds. He has cheated me our of my life savings London Nationwide

The fact that someone feels the need to make such false statements really shows the lack of character from the writer of this document. I have referred many people to work with and partner with Gil as I believe he is one of the strongest leaders in the industry.

Statements like the one above should simply be ignored and frowned upon.

Respond to this report!

#6 Consumer Comment

## Ridiculous report by disgruntled terminated employees

AUTHOR: Anonymous - (United States of America)

SUBMITTED: Wednesday, February 13, 2013

I just read the following statements and it is one of the most ridiculous claims I have read. Someone that took the time to write such false and ludicrous claims about Gil Cohen and the organization must be someone that was either terminated by the company or has enough time on their hands to come up with absolute lies.

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The fact that someone feels the need to make such false statements really shows the lack of character from the writer of this document. I have referred many people to work with and partner with Gil as I believe he is one of the strongest leaders in the industry.

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Respond to this report!

### Report & Rebuttal

Respond to this report!

Also a victim?

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### Arbitrate

Remove Reports?

No! Better yet! Arbitrate to set the record straight!



[Arabella](#)  
[She is a fraud.phoney. Internet](#)



[Instant Checkmate](#)  
[Misleading, false statements, bait and switch, bad and incorrect information](#) Internet



[Marcos Rossi](#)  
[Italian guy ripping off people in the street with fake leather jackets](#) Chicago Illinois



[Toure Williams](#)  
[T. E. Williams](#)  
[Toure Edward Williams](#)  
[Fake business man](#)  
[fake millionaire toure Williams](#) Los Angeles California Internet



[Blujav76](#) Jamie McQuoid  
[Harassment from her and her customers.](#) Stanislaus California



[Western Union](#)  
[RACIAL AND ETHNIC PROFILING - DON'T WASTE YOUR TIME WITH WESTERN UNION](#) Englewood, Colorado

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[Ripoff Report on CBS 19](#)



[Ripoff Report on CBS 19 - Global Marketing Alliance](#)



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# **EXHIBIT B**

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# Complaint Review: Gil Cohen at Metlife

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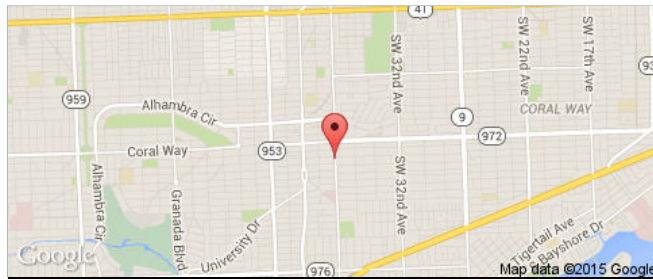
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Submitted: Sun, January 20, 2013 Updated: Sun, January 20, 2013  
Reported By: Anonymous — Delray Beach Florida United States of America

**Gil Cohen at Metlife**  
2600 South Douglas Rd.  
Coral Gables, Florida  
United States of America  
**Phone:** 305-444-7556  
**Web:**  
**Category:** Liars



## Gil Cohen at Metlife Lying, greedy, deceitful, crooked managing director at Metlife Coral Gables, Florida

\*General Comment: Mike Suter

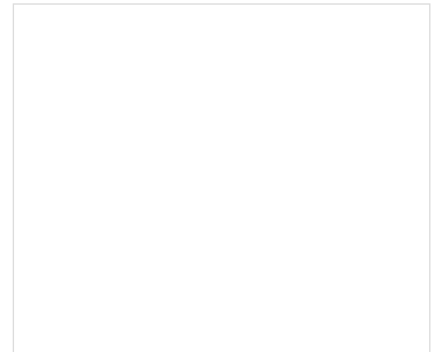
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### REBUTTAL BOX™ | Respond to this Report!

I just saw the Ripped Off Report on Gil Cohen and it is true. I also witnessed how horrible and vicious Gil really is in the Miami office When he fired manager Mike Suter for no reason except to put money in his own pocket, we were sick to our stomachs for Mike, his family and ourselves.

Mike Suter was there to help all of his agents with their careers both business and personal. After Mike was

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**\*UPDATE January 1, 2015 INVESTIGATION UPDATE**

Sac County DA Ben Smith Fails to identify false statements, fails to support accusations w/ clarifications vague sloppy misleading.

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**Ben Smith Sac County Iowa Attorney prosecutorial misconduct, improper relationship with star witnesses, allowing witnesses to knowingly lie. Tracey Richter Roberts falsely convicted, overwhelming evidence leads to estranged husband Michael Roberts, Rexxfield failed polygraph, witness intimidation, evidence tampering. Iowa Division of Criminal Investigation corruption.**

fired,Gil put his partner Ghias Ali in charge of the Miami office. This was a disaster. We never saw either one of them b/c neither one of them were ever there. Everyone was left to fend for themselves w/ no manager. We were told by many that Ghias was too busy running his restaurants instead of working for MetLife. Yet they both took enormous salaries from MetLife.

Sadly, Mike Suter died of a stress induced heart attack at the young age of 55 shortly after Gil destroyed his life and demoted him. We all think Gil was a big part of the stress that helped kill Mike.

Gil Cohen destroyed the office in Miami. I can't believe MetLife allows this to continue. Gil Cohen is making a fool of MetLife and their good name. Gil is a GIANT liar and has deceived so many.

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This report was posted on Ripoff Report on 01/20/2013 04:18 PM and is a permanent record located here: <http://www.ripoffreport.com/r/Gil-Cohen-at-Metlife/Coral-Gables-Florida-33134/Gil-Cohen-at-Metlife-Lying-greedy-deceitfulcrooked-managing-director-at-Metlife-Coral-1000273>. The posting time indicated is Arizona local time. Arizona does not observe daylight savings so the post time may be Mountain or Pacific depending on the time of year.

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REBUTTALS & REPLIES:

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0 Author 1 Consumer 0 Employee/Owner

**#1 General Comment**

**Mike Suter**

AUTHOR: Wowthisiscrazy - ()

SUBMITTED: Wednesday, July 10, 2013

I just want to say that Mike Suter was an amazing person. He truly loved his team, every day was a good day for Mike. Mike was always willing to take time to teach, listen, counsel, and be present. We all know what Gil did to Mike, it was horrible. But we need to remember that Mike was a kind loving person and someone as small as Gil could never destroy a heart as big as Mike's. Don't worry so much people. Gil Cohen will get what is coming to him. MetLife is a good company and will



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