PRESS KIT

Maderni & Dreamology Labs v. Vago, MSC Cruises USA, LLC & MSC Cruises S.A.

U.S. District Court — Southern District of Florida, Miami Division

Filed: June 2, 2026 | Case No.: 1:26-cv-23846-DPG | Counsel: John M. Pierce, John Pierce Law, P.C.

For Immediate Release - June 4, 2026 | Last Updated - June 4, 2026

All statements reflect allegations in a federal complaint filed in U.S. District Court, Southern District of Florida. Defendants have not yet filed a response. All claims are allegations.

Media Contact: info@dreamologylabs.com | For television, podcast, radio, print, and speaking inquiries: info@dreamologylabs.com

Legal Inquiries: John M. Pierce John Pierce Law, P.C. 21550 Oxnard St., 3rd Floor Woodland Hills, CA 91367 Tel: (321) 292-2366 jpierce@johnpiercelaw.com

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MEDIA CONTACT & DOWNLOADS

Media Contact

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Document Requests: Email info@dreamologylabs.com with subject line: Dreamology v. MSC — DOCUMENT REQUEST

All Available Downloads

All documents listed below are either filed as exhibits in the federal court complaint and therefore public record, or directly referenced in the complaint's factual allegations. Every file is available for immediate download. No account or login is required.

Note: Visual Timeline of Events — prepared by Dreamology Labs, Inc. to assist journalists in understanding the chronology of events. All dates and events depicted are drawn from the complaint. This document is not a court exhibit.

⬇️Download All Files & Assets (.zip file, 360 MB) - includes every individual document, case files, photos and assets for this case.

Primary Legal Filing

Full Complaint with All Exhibits Maderni & Dreamology v. Vago, MSC Cruises USA LLC & MSC Cruises S.A. U.S. District Court, Southern District of Florida, Miami Division — Filed June 2, 2026 → ⬇️DOWNLOAD FULL COMPLAINT — PDF

Key Exhibits — ⬇️Download All Exhibits [PDFs]

- Exhibit 1 — Vago's email response to Holz — August 7, 2019, Defendant Vago began expressing interest in Plaintiffs' projects following an introduction by Karl Holz, the former President of Disney Cruise Line
- Exhibit 2 — Email Introduction by Holz — September 1, 2019, Holz sent Vago a strong endorsement of the Shipsomnia concept, describing it as a uniquely scalable experiential IP with global application
- Exhibit 3 — Emails from Mac Mahon — Plaintiffs circulated the email thread to Brian Mac Mahon of Expert Dojo, a Startup Accelerator & VC in Southern California, in preparation for anticipated negotiations with MSC
- Exhibit 4 — The Signed NDA — Non-Disclosure Agreement executed September 16, 2019 between MSC Cruises S.A. and Shipsomnia. Expressly prohibited MSC from using Plaintiffs' confidential information for any purpose other than evaluating a potential partnership.
- Exhibit 5 — Vago escalated MSC's involvement — Vago invited Maderni and her co-founder to MSC's private island in the Bahamas, to MSC's London headquarters, and to a newly launched MSC cruise ship in France to discuss the full Shipsomnia IP integration
- Exhibit 6 — Vago's email response after visit in France — November 5, 2019, Maderni emailed Vago to summarize next steps. Vago responded promptly and affirmatively, stating, "Hi Alessandra thank you so much. Look forward to receiving the proposal."
- Exhibit 7 — Vago requested new proposal — November 26, 2019, Vago reviewed the materials and directed Plaintiffs to prioritize a scaled-down version of the festival program "for a couple of cruises," specifically requesting a "Shipsomnia chapter proposal" as the first phase of implementation

- Exhibit 8 & 9 — Vago's Setai Encounter Emails — Sent February 2 and 3, 2022 from pfv@msccruises.com — Vago's official MSC corporate email account — the evening before and the morning of the alleged Setai Hotel encounters. February 2: "It took me an hour to recover after seeing you. My brain was overcharged with blood and I couldn't even speak or make sense of anything." February 3: "Terribly — Could not sleep knowing you were so close."

- Exhibit 10 — The deal after the Setai encounter — February 16, 2022, Maderni sent the platform presentation and a term sheet to Vago formalizing the partnership structure and financing commitments. She contemporaneously informed senior executives and advisors that Vago had represented that he would bypass the board and that he agreed to move forward in phases with a budget below $60 million

- Exhibit 11 — Commitment ignored — March 15, 2022, having received no feedback, Maderni followed up regarding the term sheet and next steps

- Exhibit 12 — Vago's email expressing support — September 2, 2022, Vago responded with praise, writing: "Great job Alessandra, I've always thought that you are the number 1, I'm very proud of you. I will support you, you know that." This message again revived Plaintiffs' belief that MSC would move forward

- Exhibit 13 & 14 — Sexually Explicit and Coercive Communications — Sent from pfv@msccruises.com, Vago's official MSC corporate email account, and via WhatsApp

- Exhibit 15–22 — Side-by-Side Exhibits of Alleged Misappropriation and Award — Chronicles, Arkymea, ImaginOcean, and the Pirates Cove Aquapark installations on multiple ships — constitute at least four discrete, revenue-generating entertainment offerings developed and commercialized by MSC following its confidential access to Plaintiffs' creative and commercial materials under NDA

- Exhibit 23 — The WhiteWater Vendor Case Study — Publicly circulated case study crediting Vago as "creative driver" of the Kraken-and-pirate nautical design. No mention of Plaintiffs.

- Exhibit 24 — Independent Damages Analysis — Eqvista — Preliminary Independent But-For Damages Summary prepared for Dreamology Labs, Inc. Subject to expansion and refinement through discovery and expert analysis at trial. Estimated differential damages: $1,848,891,369 – $1,890,567,585

Press Materials - upload final kit / release

⬇️Full Press Release → [DOWNLOAD PRESS RELEASE — PDF]

⬇️Full Press Release Editable → [DOWNLOAD PRESS RELEASE — Word Doc]

⬇️Full Press Kit → [DOWNLOAD FULL PRESS KIT — PDF]

Media Assets

⬇️Press Photograph — Alessandra Maderni - High-resolution professional photographs, press-ready

⬇️Side-by-Side Comparison Images - Zip file, Publication Ready Exhibits 15–21 formatted as individual high-resolution images for publication

⬇️Shipsomnia Tale of the Kraken event photo. Shipsomnia logo, Dreamology Labs logo - Zip file

⬇️MSC Shipsomnia Pitch Videos Selected pitch videos presented to MSC executives

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For additional materials not listed above, contact info@dreamologylabs.com with subject line: Dreamology v. MSC — DOCUMENT REQUEST.
All links connect directly to hosted files.

All claims are allegations according to the complaint filed in U.S. District Court, Southern District of Florida, on June 2, 2026.

SECTION 1: PRESS RELEASE

FOR IMMEDIATE RELEASE — June 4, 2026 MEDIA CONTACT: Dreamology Labs | info@dreamologylabs.com | 860-569-9799 LEGAL INQUIRIES: John M. Pierce | John Pierce Law, P.C. | (321) 292-2366 | jpierce@johnpiercelaw.com

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Female Founder and Dreamology Labs Sue MSC Cruises and Chairman Pierfrancesco Vago, Seeking Nearly $1.9 Billion Over Alleged IP Theft and Sexual Exploitation

Complaint alleges a years-long pattern of fraudulent inducement and NDA-protected IP misuse, including an award-winning attraction credited to Vago as "creative driver"

Pictured: (Left) MSC Cruises' Pirates Cove Aquapark; (Right) Shipsomnia's Tale of the Kraken. Exhibit 20 to the Complaint, filed in the U.S. District Court for the Southern District of Florida.

MIAMI — (June 4, 2026) — Alessandra Maderni, founder and CEO of Dreamology Labs, Inc., has filed a federal lawsuit in the U.S. District Court for the Southern District of Florida against MSC Cruises, MSC Cruises USA, and MSC Executive Chairman Pierfrancesco Vago, alleging a years-long pattern of fraudulent business inducement, intellectual property theft, and sexual coercion.

The complaint alleges that Maderni and Dreamology Labs spent years developing proprietary experiential entertainment IP and travel-technology ventures, including the Shipsomnia franchise and XploraWorld platform. At a formal NDA-protected presentation in Geneva in September 2019, former senior Disney executives personally endorsed the Shipsomnia venture directly to Vago and MSC executives.

According to the lawsuit, between 2019 and 2025, Vago and MSC executives obtained Plaintiffs' confidential creative, commercial, and strategic materials under nondisclosure agreements and repeated assurances of potential multi-million-dollar partnerships and cruise integrations.

The suit claims that after obtaining access to confidential materials, MSC launched at least four onboard attractions and entertainment offerings aboard multiple vessels that allegedly incorporated Plaintiffs' proprietary IP and commercialization strategies without credit or compensation.

Among the offerings is Pirates Cove Aquapark — recipient of the 2023 World Waterpark Association Leading Edge Award for creativity and innovation — for which a vendor case study credited Vago as "creative driver" without referencing Plaintiffs or their NDA-protected Shipsomnia materials.

> *"Initially planned as an intergalactic adventure-themed water park, it was MSC Cruises' Executive Chairman, Pierfrancesco Vago, who pushed the team to dream bigger... He recommended incorporating a pirate ship and the imagery of a giant Kraken... making them the main characters in an exciting pirate story."* — WhiteWater, Pirates Cove Aquapark vendor case study

Central to the complaint is the allegation that this was not a conventional IP dispute, but an integrated pattern in which business inducement, sexual coercion, and misuse of corporate authority were intertwined. Plaintiffs allege Vago used promises of funding and partnership to extract proprietary business value and sexual access, while prolonging Plaintiffs' reliance through cycles of inducement, disclosure, withdrawal, and continued use of their IP.

The complaint asserts eleven causes of action, including trade secret misappropriation, copyright infringement, breach of NDA, fraudulent inducement, civil sexual battery, civil sex trafficking, Florida Civil RICO, and related claims. An independent preliminary but-for analysis estimates damages at nearly $1.9 billion, subject to discovery and expert analysis. The valuation is not a court finding or damages award.

About Dreamology Labs

Dreamology Labs, Inc. is an experiential entertainment IP and travel-technology company founded by Alessandra Maderni. Through brands including Shipsomnia, Culturepunk, and XploraWorld, the company produces immersive concepts that bring together travel, storytelling, culture, technology, and ESG-driven impact in support of a more sustainable and equitable creator economy.

Resources:
Full complaint and exhibits, media kit and case summary: www.dreamologylabs.com/presskit
Dreamology Labs Inc. website: www.dreamologylabs.com

Case 1:26-cv-23846-DPG | All claims are allegations. Defendants have not yet filed a response. Media Contact: info@dreamologylabs.com | For television, podcast, radio, print, and speaking inquiries: info@dreamologylabs.com | Legal Inquiries: John M. Pierce, John Pierce Law, P.C. | (321) 292-2366 | jpierce@johnpiercelaw.com

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The IP Story

Beginning in September 2019, Maderni and her company presented Vago and MSC executives with a suite of proprietary experiential entertainment and travel-technology concepts under a formal nondisclosure agreement executed by MSC Cruises S.A. in Geneva. These concepts included Shipsomnia, a cruise-integrated experiential IP franchise built around ocean mythology, sustainability storytelling, and scalable shipboard activations, as well as XploraWorld, formerly Exploraverse, an immersive ESG-driven travel-technology and IP activation platform.

The complaint alleges that the materials shared with MSC went far beyond general ideas. Plaintiffs disclosed confidential story worlds, character concepts, venue-integration strategies, guest-engagement mechanics, commercialization plans, rollout structures, and monetization frameworks for transforming Shipsomnia's chapter-based IP into permanent cruise attractions and branded onboard experiences.

The concepts were supported and endorsed by former senior entertainment executives, including Karl Holz, former President of Disney Cruise Line, Joe Lanzisero, former Senior Vice President of Disney Imagineering, and Adam Leipzig, former President of National Geographic Films.

From 2019 to 2025, the complaint alleges, Maderni and Dreamology Labs delivered twelve confidential venture concepts to Vago and MSC, each marked confidential or submitted under NDA protections, while relying on repeated assurances that commercial agreements were imminent.

According to the complaint, MSC did not merely retain Plaintiffs' materials. It allegedly began developing commercial offerings derived from Plaintiffs' NDA-protected material shortly after the 2019 Geneva pitch, while Vago continued assuring Maderni that agreements would move forward. Plaintiffs allege they did not discover the full scope of MSC's alleged use until September 2025.

The Four Products

While Vago allegedly told Maderni throughout 2020 and into 2022 that COVID-19 delays prevented MSC from finalizing agreements, the complaint alleges that MSC was simultaneously developing and launching four new commercial offerings based on Plaintiffs' confidential materials. According to the complaint, MSC had no precedent for experiential entertainment concepts of this type or scope before receiving Plaintiffs' NDA-protected materials. All four products allegedly launched while Vago was assuring Maderni that agreements were delayed but certain.

1. **Chronicles** — Stories That Take Flight (MSC Virtuosa, May 2021): A theatrical production featuring a mysterious storyteller who opens an illustrated storybook to unlock portals to magical realms. The complaint alleges this narrative directly parallels the Shipsomnia storybook mechanic disclosed in the Geneva pitch under NDA. The Chronicles logo, typography, and font treatment are alleged to closely resemble Shipsomnia's brand identity as presented in Plaintiffs' confidential materials.

2. **Arkymea** — The Hidden World (MSC Virtuosa, 2021): A production featuring a scientist who discovers a secret world through a mysterious device, surrounded by steampunk-style props and clockwork machinery. The complaint alleges these elements mirror Plaintiffs' Isle of Salvaga pitch — featuring a scientist-adventurer character, steampunk tools, and mysterious portals — disclosed to MSC under NDA.

3. **ImaginOcean** — Underwater Amazement (MSC Seascape, September 2022): An ocean-themed spectacle featuring mermaid-led storytelling and an underwater Atlantean setting. The complaint alleges these elements align closely with Plaintiffs' Shipsomnia Ball and The Search for Lost Rhythms narrative — including a central mermaid figure in an ancient ocean setting — disclosed to MSC in trailers, visual decks, and confidential presentations.

4. **Pirates Cove Aquapark** (MSC Seashore and MSC Seascape, 2021, 2022): An immersive waterpark featuring hand-carved Kraken tentacles wrapping around ship structures. The complaint alleges these elements mirror Plaintiffs' Shipsomnia stage environments — including giant Kraken tentacles wrapping around ship structures — shown to Vago in photographs and video footage during confidential pitch sessions. A Shipsomnia coin bearing a Kraken silhouette, given to Vago and MSC executives during

presentations, is alleged to share the same silhouette that appears in the circular splash pool of the finished waterpark.

In 2023, the Pirates Cove Aquapark received the World Waterpark Association Leading Edge Award for creativity and innovation. A publicly circulated vendor case study authored by WhiteWater — the company that designed and built the waterpark — credited Vago as the "creative driver" behind the attraction's nautical and Kraken-themed direction, noting the project was originally a space-themed concept and that Vago personally directed the redesign. No mention was made of Maderni, Dreamology Labs, or Shipsomnia. (Exhibit #23)

The Misconduct and Retaliation

The complaint does not allege a single blunt quid pro quo demand. It alleges a repeated pattern in which business promises, sexualized attention, withdrawal of support, renewed expressions of interest, and delayed accountability operated together as a system of coercive leverage. According to the complaint, that pattern caused Maderni to keep trusting, updating, and sharing strategic materials in the hope that MSC's promised partnership would finally close.

Beginning in 2020, the complaint alleges, Vago blurred professional boundaries through personal flattery, flirtatious communications, and repeated business assurances tied to MSC's promised partnership. The February 2022 Setai Hotel meetings in Miami Beach allegedly marked a turning point, when ongoing business negotiations became intertwined with unwanted physical advances, sexual pressure, and renewed promises that MSC would support Maderni's ventures.

At the February 3, 2022 Setai meeting, when Maderni allegedly objected and sought clarity about the business relationship, the complaint alleges Vago responded: "I get it, I understand the potential and it's beyond care, I would do anything for you." Immediately afterward, Vago allegedly reaffirmed that MSC would proceed with both the immersive technology platform and Shipsomnia IP activations, financed through MSC's marketing budget. Within days, however, a February 16 term sheet went unanswered, communications slowed, and prior commitments were effectively withdrawn.

The complaint further alleges that the Setai encounters initiated a prolonged pattern of virtual sexual communications through 2025, in which Vago used his authority and Plaintiffs' dependence on MSC's promised partnership to exert coercive influence. During a late-2024 WhatsApp video call involving explicit sexual conduct, Vago allegedly referenced bringing other cruise-line CEOs onto Plaintiffs' platform, further linking sexualized interactions to renewed business inducements and access to commercial opportunities.

The complaint characterizes this conduct as retaliation and coercive leverage: when Maderni sought clarity, resisted, disengaged, or attempted to set boundaries, Vago allegedly withdrew support, delayed commitments, or went silent — only to later re-engage with renewed personal attention and business inducement. In April 2025, the complaint alleges Vago sent a WhatsApp message: "If you delete [intimate] photos again, I will stop talking to you," using access and communication as leverage. Maderni terminated all contact in June 2025.

Key Allegations

NDA-Protected IP Commercialization: MSC and Vago allegedly obtained Plaintiffs' proprietary experiential entertainment IP and travel-tech materials under a signed NDA, then launched at least four commercial offerings incorporating core elements without authorization, compensation, or attribution.

False Partnership Assurances: Vago allegedly made at least five separate verbal commitments to proceed with a commercial partnership, each followed by term sheets or contemporaneous documentation, while having no real intent to perform.

COVID Delay / Alleged Parallel Development: While Vago allegedly told Maderni the partnership was delayed by COVID and that he was "happy to sign the deal after COVID," the complaint alleges MSC was simultaneously developing commercial offerings derived from Plaintiffs' NDA-protected materials. Plaintiffs allege Vago continued keeping Maderni engaged through renewed assurances while MSC benefited from the work without closing a deal.

Sexual Exploitation and Coercive Leverage: Vago allegedly used business opportunity, emotional dependency, and corporate power to obtain and maintain sexual access.

Retaliation and Withdrawal of Support: After the February 2022 Setai encounters and later boundary-setting, MSC/Vago allegedly delayed, withdrew, or ignored promised business commitments.

Award-Winning Alleged Misappropriation: A vendor case study credited Vago as the "creative driver" of an award-winning Kraken-and-pirate waterpark attraction that Plaintiffs allege was derived from NDA-protected Shipsomnia materials.

ESG and Innovation Contradiction: Plaintiffs allege MSC's public ESG and innovation branding stands in sharp contrast to the conduct described in the complaint.

Severe Damages: Plaintiffs allege the misconduct destroyed funding opportunities and enterprise value. An independent but-for valuation estimates damages at nearly $1.9 billion.

Broader Significance

Power, Access, and the Independent Founder

This case raises broader questions about how independent founders negotiate with large, privately controlled institutions in industries where access to capital, distribution, and execution is highly concentrated. The complaint alleges that the power imbalance between a global cruise conglomerate and a founder whose investors depended on MSC's participation created conditions where professional boundaries, contractual obligations, and personal safety became intertwined.

The Vulnerability of Female-Led Startups

The case also highlights the vulnerability of early-stage female-led startups that operate outside traditional employment protections, receive a disproportionately small share of venture capital funding, and whose survival and ability to scale often depend on securing a single major strategic partner. According to the complaint, MSC's continued expressions of interest allegedly encouraged Plaintiffs to keep investing time, resources, and confidential materials into the relationship long after commercial commitments failed to materialize.

ESG and Governance Questions

For ESG investors, institutional partners, and industry stakeholders, the complaint raises direct governance questions. According to the complaint, Plaintiffs' ventures were ESG-driven by design — integrating sustainability storytelling, ocean conservation programming, and a platform architecture that automatically allocated 51% of profits to environmental, social, and humanitarian causes. MSC markets itself publicly as "the environmental cruise line." The complaint alleges that MSC had the opportunity to authentically reinforce that commitment through a genuine partnership with Plaintiffs — and instead allegedly exploited their ESG-driven concepts without credit or compensation. Plaintiffs allege this conduct represents a material gap between MSC's public ESG commitments and its private conduct — one that investors, rating agencies, and strategic partners may consider relevant when evaluating MSC's governance standards.

A Contradiction of Core Family and Entrepreneurial Values

The allegations in this complaint stand in direct contradiction to MSC's own publicly stated core values. MSC Group's website states that 'the commitment of the founding Family inspires us with dedication and trust' and that 'sharing the family's entrepreneurial spirit leads us to act proactively, courageously and responsibly, in the best interest of our customers and our Company.' MSC's own promotional materials describe a company built on trust, respect, and support for those who bring bold ideas and entrepreneurial vision to the table. The complaint alleges that an independent founder (the Plaintiff) who brought exactly that — a bold, Disney-endorsed entrepreneurial vision — to MSC's leadership was met not with the trust and respect those values promise, but with years of false assurances, alleged misappropriation of Plaintiffs' confidential work, and personal misconduct. The gap between MSC's stated values and the conduct alleged in the complaint is not peripheral to this case. It is central to it.

Founder Statement

"For years, I believed MSC was genuinely interested in building something meaningful with us, and I accepted that COVID was the reason for the delay," said Alessandra Maderni, founder and CEO of Dreamology Labs. "The complaint alleges that MSC Cruises and its Executive Chairman used promises of partnership to gain access to our protected work, business strategy, and trust. We are bringing this lawsuit to seek accountability, protect our intellectual property, restore the value of what we built, and reaffirm that our vision remains commercially valuable."

"This case is not just about an IP dispute. It is about power, dependency, trust, and what can happen when an independent founder places faith in the world's largest privately controlled cruise company. I hope this lawsuit helps create greater accountability and protection for female founders, creators, and entrepreneurs operating without institutional power or traditional employment protections." — Alessandra Maderni, Founder and CEO, Dreamology Labs, Inc.

About the Legal Claims

The complaint asserts eleven causes of action:

1. Fraudulent inducement
2. Misappropriation of trade secrets
3. Copyright infringement
4. Breach of the nondisclosure agreement
5. Promissory estoppel
6. Tortious interference with prospective economic advantage
7. Unjust enrichment
8. Intentional infliction of emotional distress
9. Civil sexual battery
10. Civil sex trafficking
11. Florida RICO

A preliminary but-for valuation prepared by Eqvista, an independent third-party valuation provider, estimates differential damages at approximately $1.85 billion to $1.89 billion. This is not a court finding or damages award. These figures are subject to refinement through discovery and expert analysis at trial.

The full complaint is available for immediate download. ⬇️DOWNLOAD FULL COMPLAINT — PDF

All claims are allegations. Defendants have not yet filed a response. Media Contact: info@dreamologylabs.com | Legal Inquiries: John M. Pierce, John Pierce Law, P.C. | (321) 292-2366 | jpierce@johnpiercelaw.com

SECTION 2: MEDIA BACKGROUNDER

Opening Narrative Summary

This is a case about a founder who alleges that a global cruise company used her confidential creative and commercial work — obtained under a signed nondisclosure agreement — while its Executive Chairman maintained control over her through years of repeated partnership promises the complaint alleges were never intended to be honored.

Alessandra Maderni spent years building an experiential entertainment IP universe and travel-technology venture. Industry veterans from Disney and National Geographic endorsed the work as category-defining. In September 2019, she presented it to Pierfrancesco Vago, Executive Chairman of MSC Cruises, under a signed NDA at MSC's Geneva headquarters, believing she was on the verge of a strategic partnership that could launch the venture globally.

What followed, according to the complaint, was almost six years of false assurances: term sheets that went unanswered and meetings that ended in commitments not honored. During that same period, MSC allegedly launched at least four new entertainment offerings whose design frameworks, narrative structures, and commercialization strategies closely mirrored core elements Maderni had disclosed in confidence.

During those years, the complaint also alleges, Vago's relationship with Maderni became increasingly personal and coercive, further blurring the line between business reliance, emotional dependency, and corporate access.

One of those offerings, Pirates Cove Aquapark, won an industry award. A publicly circulated vendor case study credited Vago as the "creative driver" of the Kraken-and-pirate nautical theme, noting the attraction had originally been designed with a space theme before Vago allegedly pushed the redesign. The case study made no mention of Maderni or her company.

The Kraken was the mythological creature at the center of Shipsomnia's chapter "Tale of the Kraken" — and appeared on a coin Maderni gave Vago during their presentations. The complaint alleges that a similar Kraken silhouette appears in the splash pool of the finished waterpark.

The complaint is supported by a signed NDA, emails from Vago's MSC corporate account, contemporaneous messages to capital sources and advisors, side-by-side comparisons of Plaintiffs' materials and MSC products, an independent damages analysis, and the vendor case study.

All documents are available for immediate download in the Media Contact & Downloads section above.

Case at a Glance

Plaintiffs	Alessandra Maderni; Dreamology Labs, Inc.
Defendants	Pierfrancesco Vago; MSC Cruises USA, LLC; MSC Cruises S.A.
Court	U.S. District Court, Southern District of Florida, Miami Division
Case Number	1:26-cv-23846-DPG
Judge	Judge Darrin P. Gayles
Date Filed	June 2, 2026
Counsel for Plaintiffs	John M. Pierce, John Pierce Law, P.C.
Counsel for Defendants	J. Douglas Baldridge, Venable LLP
Primary Claims	Trade Secret Misappropriation (DTSA); Breach of NDA; Copyright Infringement; Fraudulent Inducement; Promissory Estoppel; Civil Sexual Battery; Civil Sex Trafficking under the TVPRA; Florida Civil RICO
Number of Claims	Eleven causes of action
Preliminary Damages	\$1.85B – \$1.89B (Eqvista preliminary but-for valuation — not a court finding)
NDA Signed	September 16, 2019
Setai Hotel Encounters	February 2–3, 2022
Complaint Filed	June 2, 2026
Defendants' Response	Not yet filed

Part I — Who Is Alessandra Maderni

Alessandra Maderni is the founder and CEO of Dreamology Labs, Inc., a Miami-based experiential entertainment IP and travel-technology company developing immersive, story-driven experiences across travel, film, gaming, music, and culture.

Born in Rome to an Italian father and Thai mother, Maderni is a serial entrepreneur with a background spanning nightclub ventures, branded festival production for global brands, and the design and construction of large-scale entertainment complexes in Southeast Asia. After a military coup in Thailand disrupted one such project mid-construction, Maderni rebuilt from scratch and began developing Shipsomnia with just $2,000.

With just $350,000 in seed capital from angel investors in Singapore, she produced two proof-of-concept Shipsomnia sailings out of Asia and Europe, featuring immersive production never before seen on a cruise ship. The festivals attracted guests from around the world — an achievement U.S. business advisors later described as "pulling off the impossible."

What began as an independent story-driven festival evolved into a broader vision: building an alternative-reality experiential universe at the intersection of film, gaming, music, travel, and technology, with a scalable platform for storytelling, audience engagement, immersive experiences, and IP expansion.

The vision attracted endorsements and advisory involvement from senior executives at Disney, Live Nation and National Geographic, among others, who recognized its commercial potential and whose involvement is documented in the complaint.

When COVID devastated the global cruise industry, Maderni continued building. According to the complaint, she expanded the vision into multiple commercial channels and presented twelve high-growth venture materials to MSC and Vago over nearly six years, believing the promised partnership would ultimately close and help drive capital to execute the vision.

The events alleged in the complaint have only deepened Maderni's commitment to building a more sustainable and equitable creator economy — one where artists, founders, and creatives can retain ownership of their IP, share fairly in the value they create, and access real commercial pathways without being exploited by larger institutions.

⬇️Download profile photo of Alessandra Maderni

Part II — What Is Dreamology Labs, Inc.

Dreamology Labs, Inc. is a Miami-based experiential entertainment IP and travel-technology company founded by Alessandra Maderni. The company develops original franchises, immersive story-driven experiences, and next-generation entertainment concepts at the intersection of travel, film, gaming, music, culture, and technology. - https://www.dreamologylabs.com/

Its projects include:

Shipsomnia — an immersive, story-driven voyage where each chapter transports guests deeper into an alternate reality shaped by music, destinations, cultures, and experiences.

XploraWorld — a play-to-explore platform that turns real-world destinations into quests where explorers collect artifacts, earn rewards, unlock cities, and travel as a story.

Culturepunk — a new genre, label, and movement fusing streetwear and storytelling with global heritage, counterculture, and cutting-edge technology to inspire a new generation of global explorers and creators.

According to the complaint, Dreamology Labs spent years developing proprietary experiential IP frameworks, commercialization strategies, and immersive entertainment concepts intended for expansion across cruise and land-based experiences, branded destinations, festivals, digital platforms, and brand partnerships.

At its core, Dreamology Labs was built around a broader mission: to produce world-class experiences while advancing a more sustainable and equitable creator economy in which artists, storytellers, and creatives can retain ownership of their intellectual property and participate fairly in the value they create.

Part III — Industry Endorsements Mentioned in Complaint

Karl Holz — Former President, Disney Cruise Line
Holz introduced Shipsomnia to Vago in August 2019 with a formal endorsement letter describing the concept as "a breakthrough concept and opportunity" and Maderni as an "extraordinarily talented" serial entrepreneur with "vision and business acumen." He joined Maderni's advisory team and received contemporaneous updates about Vago's commitments throughout the relationship. His September 2019 endorsement letter to Vago is filed as Exhibit 2 to the complaint.

Joe Lanzisero — Former Senior Vice President, Walt Disney Imagineering
Lanzisero served on Plaintiffs' advisory board and provided professional creative assessments of the Shipsomnia concepts, offering expert perspective on the IP's creative direction, entertainment value, and commercial potential. He also provided creative and professional assessments of multiple internal MSC projects at Plaintiffs' request — including concepts for the Carousel Lounge, onboard activities and experiences, the robot bartender project, and Ocean

Cay island — reviewing mood boards, ideas, and creative materials, all of which were subsequently presented to Vago and MSC executives.

Adam Leipzig — Former Senior Executive, Walt Disney Studios; Former President, National Geographic Films
Leipzig's producer credits include Dead Poets Society, Honey I Shrunk the Kids, and March of the Penguins. He served as a creative and business advisor on the Shipsomnia–MSC partnership structure and worked with Maderni on the comprehensive master agreement for the proposed collaboration. Leipzig was physically present at the September 17, 2019 Geneva presentation, actively presented alongside Plaintiffs, and personally endorsed the Shipsomnia IP to Defendant Vago and MSC executives — specifically highlighting its environmental storytelling, creative originality, and Hollywood entertainment value. He received contemporaneous communications about Vago's commitments, filed as part of Exhibit 10.

Zach Merck — Film, Television, and Commercial Director, RSA Films (Ridley Scott Creative Group)
Merck assisted Plaintiffs in developing Hollywood-level production materials for Isle of Salvaga — the sequel to Tale of the Kraken — including reviewing storyboards, facilitating introductions to senior executives at RSA Films, and advising on initial filming concepts. Isle of Salvaga was pitched to Defendant Vago and MSC executives at the September 17, 2019 Geneva presentation. Though not present in person, Merck provided a video endorsement that was played during the presentation to Vago and MSC executives

Jason Garner — Former CEO, Global Music, Live Nation Entertainment
Garner served as Chief Executive Officer of Global Music at Live Nation Entertainment, one of the world's largest live entertainment companies, where he oversaw North American and global concert operations. He provided ongoing consultancy to Maderni on the Shipsomnia and Dreamology Labs ventures — offering strategic business guidance spanning the live events industry and broader commercial development — and remained updated on the project's progress throughout the relevant period.

Part IV — Who Are the Defendants

Pierfrancesco Vago is the Executive Chairman of MSC Cruises S.A. and a senior figure in the global cruise industry. He is a citizen of Switzerland, residing in Geneva. According to the complaint, at all relevant times, Vago acted within the actual, apparent, and ratified scope of his authority as a senior corporate officer of MSC entities. The complaint alleges that Vago purposefully directed business activities, communications, and meetings into the State of Florida — including the February 2022 Miami encounters at the Setai Hotel in Miami Beach — and is subject to personal jurisdiction in the Southern District of Florida.

MSC Cruises USA, LLC is a Florida limited liability company with its principal place of business in Fort Lauderdale, Florida. It is the United States operating arm of MSC Cruises S.A. and conducted business with Plaintiffs in Florida and throughout the United States. The complaint alleges MSC USA is jointly and severally liable for the acts of Vago and other MSC executives under principles of agency, respondeat superior, ratification, and alter-ego liability, and for its own independent misconduct.

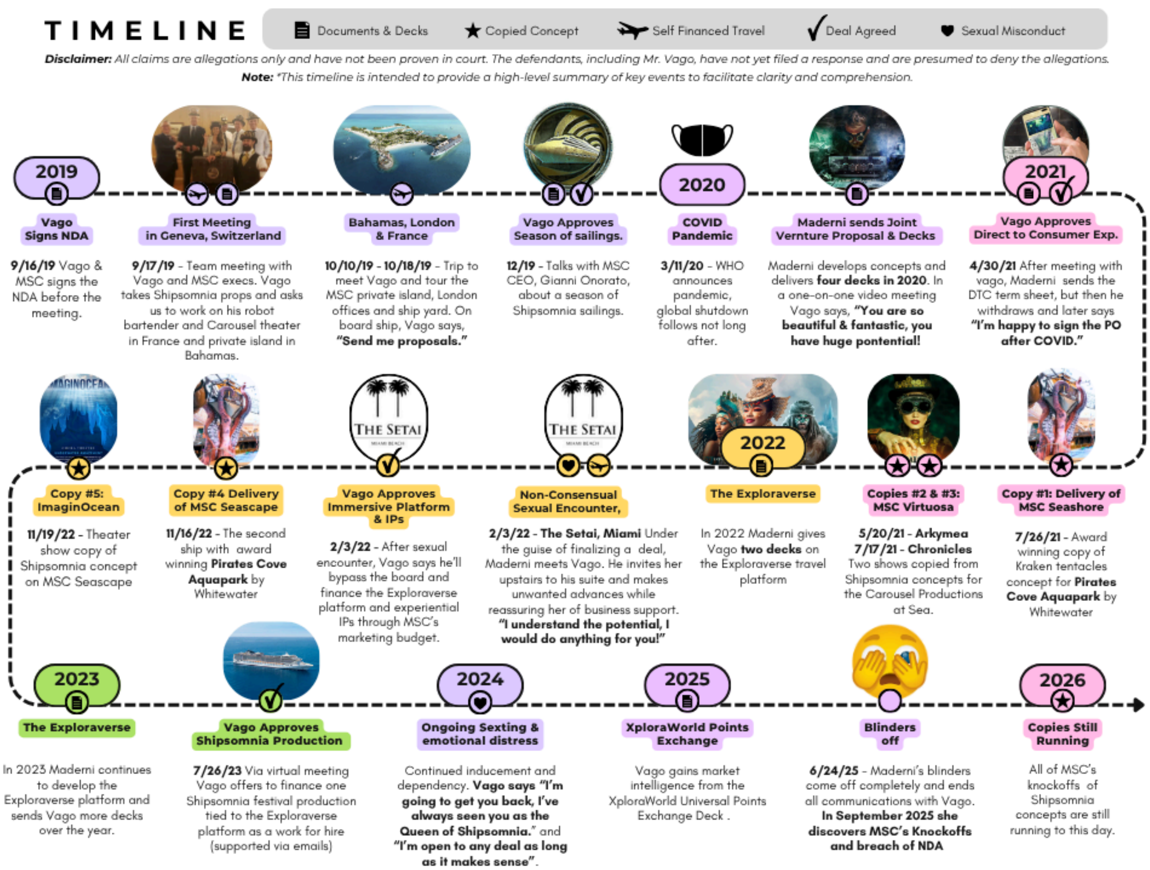
MSC Cruises S.A. is a Swiss corporation headquartered in Geneva, Switzerland, and one of the largest privately controlled cruise and shipping groups in the world. According to the complaint, MSC Cruises S.A. exercised direct control over Vago's conduct, benefited from the alleged misconduct, and is jointly and severally liable under principles of agency, ratification, respondeat superior, and alter-ego liability.

MSC has built a significant public profile around environmental sustainability, ocean conservation, and responsible corporate governance. The complaint alleges a material contradiction between those public commitments and the internal conduct alleged in the case.

Part V — The Relationship: Full Chronological Timeline

Visual Timeline:
*Disclaimer: All claims are allegations only and have not been proven in court. The defendants, including Mr. Vago, have not yet filed a response and are presumed to deny the allegations.
*Note: Visual timeline is intended to provide a high-level summary of key events to facilitate clarity and comprehension.

⬇️Visual Timeline - Download pdf



2019: NDA, Geneva Pitch, and Proposal Requests

August 2019 — Pierfrancesco Vago receives an introduction to Maderni and the Shipsomnia concept from Karl Holz, former President of Disney Cruise Line. Holz describes the concept as "a breakthrough concept and opportunity." Vago responds enthusiastically and personally initiates direct email communication with Maderni, scheduling a formal presentation at MSC headquarters in Geneva. From the outset, Vago positions himself as the decision-maker with full authority to greenlight partnerships.

September 16, 2019 — A formal, written nondisclosure agreement is signed by MSC Cruises S.A. and Shipsomnia. The NDA is governed by UK law and coordinated by MSC corporate lawyer Giulio Biggi. It expressly prohibits MSC from using or disclosing Plaintiffs' confidential information for any purpose other than evaluating a potential partnership.

September 17, 2019 — Maderni and her team formally present the Shipsomnia concept to Vago and a senior MSC executive team in Geneva. Attendees include Andrea Gangale (SVP Product Development and Guest Experience), Bernhard Stacher (SVP Shipboard Hospitality), and Trevor Young (Vice President New Building). During the presentation, Vago states: "I'm going to make you huge. You only have to impress me. Are you ready to play in the big league?

You are reconnecting with your Italian roots for something huge." Senior MSC executive Trevor Young later privately tells Maderni over dinner that Vago routinely makes such statements to presenters — characterizing them as grandiose talk rather than genuine commitments.

September–November 2019 — Vago escalates MSC's involvement immediately after the Geneva pitch. He invites Maderni to MSC's private island in the Bahamas, to MSC's London headquarters, and to a newly launched MSC cruise ship in France where MSC flies Plaintiffs and senior executives together by private jet. During the France visit, Vago asks Maderni to assess the main onboard theater of the MSC Virtuosa — the same theater in which MSC later launches two productions the complaint alleges are derived from Plaintiffs' confidential materials. Vago also requests that Plaintiffs evaluate an internal MSC "robot bartender" project. Maderni collaborates with Joe Lanzisero to develop a full creative assessment, which is presented to Vago aboard the private jet.

November 5, 2019 — Vago emails Maderni from pfv@msccruises.com: "Hi Alessandra, thank you so much. Look forward to receiving the proposal."

November 26, 2019 — Vago emails from pfv@msccruises.com directing Maderni to send "just the Shipsomnia chapter proposal for a couple of cruises" as the first phase of implementation.

2020: COVID Delays and Continued Assurances

January–February 2020 — Maderni delivers revised festival-sailings proposals. Vago forwards them to MSC CEO Gianni Onorato for feasibility review. Onorato schedules a follow-up call, expresses enthusiasm, and circulates the proposals to MSC USA's marketing and analytics teams for ROI modeling — steps the complaint notes MSC typically undertook only for initiatives proceeding toward approval. Plaintiffs outline a family-friendly Shipsomnia program projected to increase fare yields by approximately 50%.

March 1, 2020 — As COVID-19 emerges globally, MSC informs Plaintiffs the Shipsomnia agreement is being paused. Vago emails: "Thank you Alessandra, will indeed keep it in our mind and your words are much appreciated." MSC does not withdraw interest in the project. Throughout 2020 and 2021, Vago repeatedly assures Maderni the delay is temporary and that he is "happy to sign the deal after COVID."

September 2020 — Maderni submits an additional joint venture proposal. A virtual meeting follows with Ruben Rodriguez, President of MSC Cruises USA, who states MSC cannot proceed immediately but expresses interest in re-engaging once consumer demand stabilizes. Rodriguez privately comments that Vago appears unusually captivated by Maderni and notes MSC typically partners only with "global brands" — reflecting internal awareness that Vago's involvement is atypical. Vago and CEO Onorato are copied on all related communications.

2021: MSC Launches New Entertainment Offerings

2021 — While Vago continues to assure Maderni the partnership will proceed "after COVID," MSC launches two new theatrical productions aboard the MSC Virtuosa:

2021 — MSC launches Chronicles — Stories That Take Flight aboard MSC Virtuosa. The complaint alleges this production mirrors the Shipsomnia storybook mechanic, steampunk aesthetic, and portal narrative framework disclosed to MSC under NDA.

2021 — MSC launches Arkymea — The Hidden World aboard MSC Virtuosa. The complaint alleges this production mirrors Plaintiffs' Isle of Salvaga pitch — featuring a scientist-adventurer character, steampunk tools, and mysterious portals — disclosed under NDA.

Throughout 2020–2021, during one-on-one Teams meetings, Vago continues to inject personal and flirtatious commentary into business discussions, blending professional assurances with expressions of personal admiration. He tells Maderni: "I'm happy to sign it post-COVID, we are the strongest financial partner for you, you are so beautiful and fantastic!" The complaint alleges this pattern was deliberate — designed to cultivate emotional reliance, trust, and dependency to maintain continued engagement and disclosure of proprietary materials.

February 2022: Setai Hotel and Term Sheet

January 31, 2022 — Maderni sends Vago the Dreamology/Exploraverse platform deck. Vago schedules an in-person meeting at the Setai Hotel in Miami Beach for February 2.

February 2, 2022 — Maderni meets Vago at the Setai Hotel for what she understands to be a business meeting to finalize a deal. After briefly discussing the project at the hotel's outdoor restaurant, Vago asks her to accompany him to his suite. The complaint alleges he initiated physical contact and blurred the business meeting into personal intimacy. That evening, Vago emails from pfv@msccruises.com: "It took me an hour to recover after seeing you. My brain was overcharged with blood and I couldn't even speak or make sense of anything."

February 3, 2022 — Vago asks to meet again at the Setai Hotel. He emails from his MSC corporate account: "Terribly — Could not sleep knowing you were so close." The complaint alleges the first sexual encounter occurs. When Maderni verbally objects and seeks clarity about the business relationship, Vago states: "I get it, I understand the potential and it's beyond care, I would do anything for you." Immediately after, he reaffirms by telling Maderni that he will "bypass the board" and that MSC will proceed with the immersive technology platform and Shipsomnia festival sailings, financed through MSC's marketing budget.

February 16, 2022 — Consistent with Vago's post-encounter representations, Maderni sends the formal Dreamology/Exploraverse term sheet to Vago. She contemporaneously informs advisors Karl Holz, Adam Leipzig, and investor contacts of Vago's commitments. Vago does not respond.

2022–2023: Withdrawal, Product Launches, and the Award

March 15, 2022 — Maderni follows up on the unanswered term sheet. Vago ignores her email and sends a brief Facebook Messenger message citing the Ukraine conflict and the "embryonic stage" of the Metaverse as reasons MSC cannot proceed. The complaint characterizes this explanation as pretextual.

April 2022 — Vago arranges a Teams meeting that, when it begins, includes MSC's Chief Innovation Officer Luca Pronzati — apparently to have Maderni present her immersive technology platform without a new NDA in place. Vago is over an hour late. Maderni leaves before the meeting begins.

July 2022 — Vago introduces a junior MSC marketing manager, Silvia Godinho, via email with the message: "Let me introduce Alessandra, she has quite a vision… let's see if we may have an interest." The complaint characterizes this as an attempt to reframe an advanced commercial negotiation as exploratory while avoiding accountability for prior commitments.

September 2022 — MSC announces ImaginOcean — Underwater Amazement for MSC Seascape, which begins sailing in November 2022. The complaint alleges this production mirrors Plaintiffs' Shipsomnia Ball and ocean mythology narrative — including a central mermaid figure in an Atlantean underwater setting — disclosed under NDA.

November 2022 — Pirates Cove Aquapark launches aboard MSC Seascape. According to the WhiteWater vendor case study, the project was initially planned as an intergalactic adventure-themed water park before Vago pushed the team toward a pirate-and-sea-themed concept featuring a giant Kraken — nautical and mythological theming Plaintiffs allege they had presented to him in confidential pitch sessions.

October 2023 — The Pirates Cove Aquapark receives the World Waterpark Association Leading Edge Award for creativity and innovation. The WhiteWater vendor case study credits Vago as the "creative driver." Maderni and Dreamology Labs are not mentioned. The Shipsomnia coin bearing a Kraken silhouette — given to Vago and MSC executives during presentations — is alleged to share the same silhouette as the circular splash pool of the finished waterpark.

October 2023 — After Maderni insists MSC execute a new NDA covering a printed copy of her Exploraverse presentation that Vago's secretary requested without protection, MSC in-house counsel Mio Massimiliano insists the NDA be placed under UK jurisdiction before MSC will return or destroy the confidential material — confirming MSC's continued possession of Plaintiffs' proprietary information.

2023–2025: Continued Communications and Final Break

February–May 2023 — Vago intermittently revives personal and professional engagement. He responds warmly to personal outreach while ignoring outstanding professional obligations and unresolved term sheets. On May 12, 2023, he replied to Maderni's birthday message: "My love, thank you so so much! Missing you…"

July 26, 2023 — In a virtual meeting, Vago tells Maderni "You absolutely deserve it" then suggests reducing the partnership to a one-off "work-for-hire" payment for a single festival production — dramatically inconsistent with years of multi-million-dollar partnership discussions. He ends the meeting abruptly.

2023–2025 — The complaint documents a pattern of coercive digital communications via email, Facebook Messenger, and WhatsApp in which Vago alternates between renewed promises of commercial partnership and explicit, coercive demands for intimate content. He makes statements including: "I'll get you back, I've always viewed you as the Queen of Shipsomnia" and "I'm open to any deal as long as it makes sense" — while refusing to provide substantive feedback or finalize any agreement.

March 2025 — Vago instructs MSC executive Marco Ottaviani, Head of CRM and Customer Activation, to call Maderni and formally withdraw MSC's participation in the XploraWorld platform — communicating through a subordinate a withdrawal of commitments Vago had personally and repeatedly made.

April 26–27, 2025 — Via WhatsApp, Vago sends: "If you delete (intimate) photos again, I will stop talking to you."

June 2025 — Maderni informs Vago directly that the relationship has been unhealthy and that he exercised disproportionate emotional and psychological influence over her. When given the opportunity to address or explain his conduct, Vago does not respond and effectively ghosts her. Maderni terminates all contact.

2025–2026: Discovery and Filing

September 2025 — Maderni investigates and discovers the alleged misappropriation and the WhiteWater vendor case study publicly crediting Vago as "creative driver" of the Pirates Cove Aquapark's Kraken-and-pirate nautical theme. She makes the direct comparison to the Shipsomnia materials she had disclosed to Vago under NDA.

June 2, 2026 — Complaint filed, U.S. District Court, Southern District of Florida, Miami Division.

Part VI — The Award and Third-Party Evidence

In 2023, the World Waterpark Association recognized Pirates Cove Aquapark aboard MSC Seascape with a Leading Edge Award for creativity and innovation in waterpark design. The award is a matter of public record, independently documented by the World Waterpark Association and the design vendor, WhiteWater.

The WhiteWater vendor case study — authored and publicly circulated by the company that built the waterpark, not by Plaintiffs — states that the waterpark was originally designed as an intergalactic, space-themed attraction. According to the case study, MSC Cruises' Executive Chairman, Pierfrancesco Vago, directed the team to redesign the concept around a pirate ship and a giant Kraken. The case study credits Vago as the "creative driver" of the resulting design. The case study makes no mention of Maderni, Dreamology Labs, or Shipsomnia.

The complaint alleges the following about this document:

Vago's direction to incorporate the Kraken-and-pirate nautical theme was not independently conceived. According to the complaint, it was derived from Plaintiffs' Shipsomnia materials — specifically, photographs and video footage of Shipsomnia stage environments featuring giant Kraken tentacles wrapping around ship structures, and the broader Shipsomnia narrative universe of nautical mythology and immersive pirate-sea adventure — all disclosed to Vago under NDA across multiple confidential pitch sessions beginning in 2019.

The award that publicly celebrated Vago's "creativity and innovation" was, according to the complaint, built on creative concepts that originated with Maderni and Dreamology Labs — whose names do not appear anywhere in the vendor case study, the award documentation, or any MSC public communications about the attraction.

Why this document matters for reporters:

The WhiteWater vendor case study is not a document created by Plaintiffs or their attorneys. It is an independently authored, publicly circulated commercial document. It is verifiable, citable, and independently confirms that Vago personally directed the Kraken-and-pirate theme. The complaint alleges that Vago had access to those concepts through Plaintiffs' confidential pitch materials before MSC implemented them.

Download the vendor case study — Exhibit 23 — in the Media Contact & Downloads section above.

Part VII — The Legal Claims in Plain English

1. **Fraudulent Inducement** (All Defendants) Vago and MSC made repeated, specific promises of commercial partnership with no alleged present intent to perform. The complaint alleges these misrepresentations induced Maderni to continue disclosing proprietary materials, invest substantial resources in MSC-specific concept development, and forgo alternative partnerships — while MSC simultaneously developed commercial offerings allegedly incorporating Plaintiffs' materials.

2. **Misappropriation of Trade Secrets** — Federal DTSA (All Defendants) Plaintiffs' experiential frameworks, narrative architectures, technology integration concepts, and monetization models are alleged to constitute trade secrets under the federal Defend Trade Secrets Act. Defendants are alleged to have obtained these trade secrets through fraudulent inducement, then used them without authorization to develop and commercialize at least four revenue-generating commercial offerings.

3. **Copyright Infringement** (All Defendants) Plaintiffs are alleged to be the sole authors of original copyrighted works — pitch decks, story synopses, narrative treatments, scripted entertainment concepts, and audiovisual materials — that Defendants had direct access to under NDA. The four MSC commercial products are alleged to reproduce and derive from Plaintiffs' protected expression in narrative sequencing, character archetypes, thematic architecture, visual staging, and audience engagement mechanics.

4. **Breach of Non-Disclosure Agreement** (All Defendants) The September 2019 NDA expressly prohibited MSC from using Plaintiffs' confidential information for any purpose other than evaluating a potential partnership. Defendants are alleged to have incorporated Plaintiffs' concepts into four commercial offerings, circulated protected materials internally beyond the permitted scope, and retained and used those materials after declining to proceed with the partnership.

5. **Promissory Estoppel** (All Defendants) Defendants made clear, definite, and repeated promises — including to fund Plaintiffs' ventures through MSC's marketing budget and execute submitted term sheets — that Plaintiffs reasonably relied upon to their significant and foreseeable detriment. Enforcement is necessary to avoid injustice.

6. **Tortious Interference with Prospective Economic Advantage** (All Defendants) Defendants' false partnership promises are alleged to have created the false appearance of an imminent commercial relationship, preventing Plaintiffs from securing alternative investor capital that was expressly conditioned on MSC's participation.

7. **Unjust Enrichment** (All Defendants) Defendants are alleged to have obtained substantial commercial value — including development cost savings, accelerated time-to-market, and the reputational prestige of an industry award — from Plaintiffs' intellectual labor without compensation. Equity requires disgorgement.

8. **Intentional Infliction of Emotional Distress** (All Defendants) Defendants' conduct — including the alleged sexual encounters, coercive digital communications, threats, and years-long pattern of manipulation — is alleged to constitute extreme and outrageous conduct causing severe, foreseeable, and ongoing emotional harm to Maderni.

9. **Civil Sexual Battery** — Florida Law (Vago) On February 3, 2022, Vago is alleged to have intentionally initiated non-consensual sexual contact with Maderni, obtained through fraud, coercion, and abuse of corporate power. Any purported consent is alleged to have been invalid under Florida law as obtained through coercive circumstances and abuse of authority.

10. **Civil Sex Trafficking** — Federal TVPRA (All Defendants) Vago is alleged to have used fraud, coercion, and abuse of professional authority — including false promises of commercial advancement and the conditioning of business opportunity on sexual compliance — to obtain sexual acts from Maderni. The complaint alleges MSC benefited from Vago's conduct because it helped maintain Plaintiffs' continued engagement, access, and disclosure of proprietary materials, which MSC allegedly used for commercial offerings and market intelligence. The claim is asserted against MSC under the TVPRA's civil-beneficiary theory, which permits claims against parties alleged to have knowingly benefited from participation in a venture involving trafficking conduct.

11. **Florida Civil RICO** (All Defendants) Defendants are alleged to have constituted an enterprise conducting a continuous pattern of racketeering activity — including trade secret theft, wire fraud, and fraudulent practices — from 2019 through 2025. Plaintiffs seek treble damages under Fla. Stat. §§ 772.11 and 772.104.

Part VIII — Damages

A preliminary but-for valuation prepared by Eqvista, an independent third-party valuation provider, estimates the enterprise value of the contemplated MSC-supported commercial opportunity on a but-for basis at nearly $1.9 billion.

This is not a court finding or damages award. These figures are preliminary, prepared for purposes of the initial complaint filing, and are subject to expansion and refinement through discovery and expert analysis at trial.

Key figures from the Eqvista preliminary analysis (Exhibit 24):

Estimated but-for enterprise value	$1,899,831,812

Estimated residual enterprise value (no MSC)	$9.3 million – $50.9 million
Estimated differential damages	$1,848,891,369 – $1,890,567,585

The analysis reflects the role MSC's anchor-partner status played in Plaintiffs' capital formation. MSC's involvement was a condition precedent for institutional capital commitments — meaning its alleged withdrawal did not merely affect one revenue stream but is alleged to have collapsed the entire investment thesis on which the ventures' growth projections were based.

Additional damage components sought include: loss of licensing revenues; loss of anticipated revenue-share contracts; destruction of downstream investment capital; destruction of enterprise value; alleged misappropriation and commercialization of proprietary IP; unjust enrichment; and reputational, emotional, and professional harm to Maderni personally.

The complaint seeks compensatory damages, disgorgement of profits, injunctive relief, punitive damages where available, exemplary damages under the DTSA, treble damages under Florida's civil RICO statute, and attorneys' fees and costs where permitted by law.

The Independent Damages Analysis

Exhibit 24 to the Complaint Source: Eqvista — Preliminary But-For Damages Summary, prepared for Dreamology Labs, Inc.

Why it matters: This is an independent valuation prepared by a third-party financial analysis firm — not by Plaintiffs or their attorneys. It establishes a quantified economic framework for the enterprise value differential between a world in which MSC honored its alleged partnership commitments and a world in which it did not.

Reporter Note: These figures are preliminary, prepared by an independent third-party valuation provider for purposes of the initial complaint filing. They are not a court finding or damages award. Defendants have not yet responded to the complaint and will have the opportunity to challenge these figures through their own expert analysis in litigation.

⬇️Exhibit 24

SECTION 3: KEY DOCUMENTS

All documents in this section are either filed as exhibits in the federal court complaint and therefore public record, or directly referenced in the complaint's factual allegations. Every document is available for immediate download in the Media Contact & Downloads section at the top of this press kit.

Top 5 Most Important Documents

The following five documents represent the strongest and most immediately accessible evidentiary materials in this case. Each is available for immediate download above.

1. The Signed NDA (Exhibit 4) — A key confidentiality document supporting Plaintiffs' IP and trade-secret allegations. Signed by MSC Cruises S.A., it restricted MSC's use of Plaintiffs' confidential materials to evaluation of a potential partnership. For Plaintiffs, MSC's alleged later use of those materials is central to the broader narrative of bad-faith dealing.

2. The Post-Encounter Emails (Exhibits 8 & 9) — Sent from Vago's official MSC corporate email account the evening of and morning after the alleged Setai Hotel encounters. Contemporaneous communications bearing his Executive Chairman signature block.

3. The WhiteWater Vendor Case Study (Exhibit 23) — An independently authored, publicly circulated commercial document that credits Vago as "creative driver" of the Kraken theme, confirms the project was originally space-themed, and makes no mention of Maderni or Dreamology Labs.

4. The Side-by-Side Comparison Exhibits (Exhibits 15–22) — Visual and written comparisons placing MSC's four commercial products alongside the NDA-protected Shipsomnia materials, reviewed by entertainment industry experts.

5. The Term Sheet Transmission and Contemporaneous Communications (Exhibit 10) — Documents Maderni's real-time transmission of the formal term sheet and contemporaneous communications to advisors and investors regarding Vago's alleged post-encounter commitments. The exhibit is important because it corroborates Plaintiffs' reliance and the timeline of events.

⬇️Download All Exhibits (1-24)

Photography and Media Assets

The following assets are available for immediate download in the Media Contact & Downloads section at the top of this press kit:

Press Photograph — Alessandra Maderni: High-resolution professional photograph, cleared for press use.

Side-by-Side Comparison Images — Publication Ready: Exhibits 15–22 formatted as individual high-resolution images suitable for publication.

Shipsomnia Creative Materials: Selected event photography and creative materials demonstrating the visual universe of the IP, available for press use.

For additional media assets, contact info@dreamologylabs.com with subject line: Dreamology v. MSC — MEDIA ASSETS

⬇️Shipsomnia and Dreamology Assets

⬇️Alessandra Maderni Profile Photo

SECTION 4: QUESTIONS RAISED BY THE COMPLAINT

A. What did MSC leadership know about Vago's conduct, and when?

B. Why were Plaintiffs' NDA-protected materials allegedly used or retained after MSC failed to close a deal?

C. What safeguards exist when a powerful corporate executive negotiates directly with an independent female founder?

D. Did MSC investigate the allegations after receiving notice?

E. What governance review, if any, has MSC undertaken regarding Vago's leadership role while these allegations are pending?

F. How does MSC reconcile its public sustainability and responsible-business commitments with allegations that it exploited ESG-driven IP and the female founder behind it?

G. What protections exist for founders who are not employees, but whose companies depend on corporate traction, access, and validation?

H. Why do female founders remain especially vulnerable when capital, credibility, and commercial opportunity depend on male-dominated gatekeepers?

I. How should companies prevent executives from mixing personal relationships with business opportunities involving founders?

J. Should responsible-business commitments extend beyond environmental initiatives to include how companies treat founders, creators, and innovation partners?

SECTION 5: CASE QUICK REFERENCE

For journalists on deadline — everything you need in under two minutes.

Fact Sheet

Case Name	Alessandra Maderni and Dreamology Labs, Inc. v. Pierfrancesco Vago, MSC Cruises USA, LLC, and MSC Cruises S.A.
Court	U.S. District Court for the Southern District of Florida, Miami Division
Case Number	1:26-cv-23846-DPG
Judge	Judge Darrin P. Gayles
Date Filed	June 2, 2026
Counsel for Plaintiffs	John M. Pierce, John Pierce Law, P.C.
Address	21550 Oxnard St., 3rd Floor, Woodland Hills, CA 91367
Phone	(321) 292-2366
Counsel for Defendants	J. Douglas Baldridge, Venable LLP
Email	jpierce@johnpiercelaw.com
Media Contact	info@dreamologylabs.com

Defendants' Response	Not yet filed
⬇️Download All Files & Assets	Download All

Key Individuals Reference Card

Name	Role	Significance to Case
Alessandra Maderni	Plaintiff; Founder and CEO, Dreamology Labs, Inc.	Creator of all IP at issue; recipient of alleged misconduct; based in Miami
Jay Slangen	Founder and Chief Creative Officer, Dreamology Labs, Inc.	Co-founder of Dreamology Labs. Attended the presentation in Geneva. Co-creator of all IP at issue. Based in Miami.
Dreamology Labs, Inc.	Plaintiff; Delaware corporation	Owner of all Shipsomnia, XploraWorld, Culturepunk, and Dreamology IP
Pierfrancesco Vago	Defendant; Executive Chairman, MSC Cruises S.A.	Central defendant; directed the relationship with Maderni; sent emails from MSC corporate account; directed Pirates Cove Kraken redesign per vendor case study
MSC Cruises USA, LLC	Defendant; Florida corporation; U.S. operating arm of MSC	Fort Lauderdale-based; conducted business with Plaintiffs in Florida; jointly and severally liable per complaint
MSC Cruises S.A.	Defendant; Swiss corporation; global parent entity	Geneva-based; signed the NDA; parent of MSC USA; benefited from alleged misconduct
Karl Holz	Former President, Disney Cruise Line; Maderni advisor	Introduced Shipsomnia to Vago; wrote formal endorsement letter; received contemporaneous communications about Vago's commitments
Joe Lanzisero	Former SVP, Walt Disney Imagineering; creative collaborator	Collaborated with Maderni on MSC presentation in Geneva, including robot bartender project

Adam Leipzig	Former President, National Geographic Films; senior Disney executive	Creative and business advisor; attended the presentation in Geneva; worked on master agreement; received contemporaneous communications about Vago's commitments
Zach Merck	Hollywood film director at RSA Films (Ridley Scott Creative Group	Assisted Plaintiffs in developing Hollywood-level production materials for Isle of Salvaga and provided a video endorsement played during the September 17, 2019 Geneva presentation to Vago and MSC executives.
Jason Garner	Former CEO, Global Music, Live Nation Entertainment	Provided ongoing strategic and business consultancy to Plaintiff on the Shipsomnia and Dreamology Labs ventures and remained updated on the project throughout the relevant period.
Gianni Onorato	CEO MSC Cruises	Personally engaged in evaluating Shipsomnia in 2020; requested ROI modeling; received forwarded proposals — establishing CEO-level MSC awareness
Ruben Rodriguez	President, MSC Cruises USA	Participated in 2020 virtual meeting; noted Vago's unusual personal interest in Maderni; confirmed COVID pause while expressing intent to re-engage
Luca Pronzati	MSC Chief Innovation Officer	Attended Geneva pitch; toured Maderni through MSC Virtuosa in France; attempted 2022 Exploraverse meeting without NDA
Andrea Gangale	MSC SVP Product Development and Guest Experience	Attended September 17, 2019 Geneva pitch; participated in internal evaluation of Shipsomnia
Bernhard Stacher	MSC SVP Shipboard Hospitality	Attended September 17, 2019 Geneva pitch; reflects multi-departmental MSC institutional awareness
Giulio Biggi	MSC corporate lawyer	Coordinated NDA execution — establishing institutional awareness of and consent to its terms

Trevor Young	VP New Building	Attended Geneva pitch; privately told Maderni that Vago's "make you huge" promises were "grandiose talk" — reflecting internal awareness of Vago's pattern
Paolo Sitia	Lead Italian architect, MSC new builds	During the ship tour in France, privately described Vago's conduct. The remark reflected broader internal criticism and discussion among MSC personnel regarding Vago's personality and conduct.
Silvia Godinho	MSC New Builds Marketing Manager	Introduced by Vago in July 2022 — complaint characterizes as a re-routing tactic to reframe an advanced commercial negotiation as exploratory
Marco Ottaviani	MSC Head of CRM and Customer Activation	Instructed by Vago in March 2025 to call Maderni and deliver formal withdrawal — communicating through a subordinate commitments Vago had personally made
Mio Massimiliano	MSC in-house counsel	In October 2023, demanded UK jurisdiction NDA before MSC would return or destroy Maderni's confidential printed presentation — confirming continued possession
Brian Mac Mahon	Expert Dojo (VC/Accelerator)	Investor contact documenting early reliance on MSC's expressed intent to partner
John M. Pierce	Counsel for Plaintiffs, John Pierce Law, P.C.	Lead attorney; (321) 292-2366; jpierce@johnpiercelaw.com

Media Contact and Document Requests

Press Inquiries: info@dreamologylabs.com

Legal Inquiries: John M. Pierce John Pierce Law, P.C. 21550 Oxnard St., 3rd Floor Woodland Hills, CA 91367 Tel: (321) 292-2366 jpierce@johnpiercelaw.com

All documents available for immediate download are listed in the Media Contact & Downloads section at the top of this press kit.

All allegations contained in this press kit are drawn from the complaint filed in U.S. District Court for the Southern District of Florida on June 2, 2026. All claims are allegations according to the complaint. Defendants have not yet filed a response. The complaint and all exhibits referenced herein are public court documents.

Dreamology v. MSC et al. | Case No. 1:26-cv-23846-DPG | U.S. District Court, Southern District of Florida, Miami Division Counsel: John M. Pierce, John Pierce Law, P.C. | **June 2, 2026**