

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
IN AND FOR FLAGLER COUNTY, FLORIDA CIVIL DIVISION

JOE MULLINS,
Plaintiff,

v.

Case No.: 2026 CA 000332

PIERRE TRISTAM and
FLAGLERLIVE, INC.,
Defendants.

_____ /

COMPLAINT FOR DEFAMATION (LIBEL)

Plaintiff, Joe Mullins (“Plaintiff” or “Mullins”), sues Defendants, Pierre Tristam (“Tristam”) and FlaglerLive, Inc. (“FlaglerLive”) (collectively, “Defendants”), and alleges:

This action arises from Defendants’ repeated publication of false, misleading, and defamatory statements concerning Plaintiff Joe Mullins. Through articles, commentary, and related online publications, Defendants portrayed Plaintiff as corrupt, dishonest, unethical, and extremist, while omitting material facts and disregarding contrary information. These publications damaged Plaintiff’s personal and professional reputation, exposed him to public contempt and ridicule, and caused substantial reputational and economic harm.

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Joe Mullins is a natural person and resident of the State of Florida, maintaining principal residences and business interests in Flagler County, Florida, and Augusta, Georgia.
2. Plaintiff is engaged in business activities through entities commonly known as “The Joe Mullins Companies,” including operations and investments in Florida and Georgia.
3. Defendant FlaglerLive, Inc. is, upon information and belief, a Florida corporation or nonprofit entity operating a news and commentary website known as “FlaglerLive.com,”

regularly publishing articles to readers in Flagler County, throughout Florida, and nationwide.

4. Defendant Pierre Tristam is, upon information and belief, a resident of Flagler County, Florida, and serves as editor, publisher, and/or principal author for FlaglerLive.com.
5. At all times material hereto, Defendants acted individually and in concert with one another, and each Defendant participated in, authorized, ratified, approved, or republished the defamatory statements alleged herein.
6. This Court has subject matter jurisdiction because the amount in controversy exceeds Fifty Thousand Dollars (\$50,000.00), exclusive of interest, costs, and attorneys' fees.
7. Venue is proper in Flagler County, Florida because Defendants reside and conduct business in Flagler County, the defamatory publications were published in Flagler County, and Plaintiff sustained reputational and economic injury in Flagler County.

GENERAL FACTUAL ALLEGATIONS

8. Beginning in or around 2024, Defendants published and republished numerous false and defamatory statements concerning Plaintiff through articles appearing on FlaglerLive.com and related online platforms.
9. Among those publications was an article dated November 18, 2024, entitled "Joe Mullins, Disgraced in Flagler County, Declares Run for Waltz's Congressional Seat."
10. In that article, Defendants asserted, among other things, that Plaintiff was "disgraced out of office," engaged in "outrageous behavior," and "belligerently tried to get out of a traffic stop by telling a cop that he ran Flagler County."

11. Defendants further published that Plaintiff had “attempted to get out of a ticket months earlier in another county.”
12. Those statements were false, misleading, and defamatory.
13. Plaintiff did not improperly seek to evade law enforcement consequences, request preferential treatment, or misuse public office in connection with any traffic citation or law enforcement interaction.
14. Plaintiff contemporaneously disputed Defendants’ characterization and expressly denied attempting to “get out of” any citation or invoking political influence to avoid legal consequences.
15. Defendants nevertheless published the accusations as factual assertions despite the existence of contrary information and Plaintiff’s denials.
16. Defendants also published additional articles and commentary concerning Plaintiff’s business affairs, finances, and alleged professional conduct.
17. On or about August 30, 2024, Defendants published an article entitled “Six Joe Mullins Properties Ordered into Receivership in Georgia; 2 Local Properties’ Delinquent Taxes on Installment Plan.”
18. That publication prominently featured allegations that Plaintiff was “misappropriating funds,” improperly managing assets, and engaging in financial misconduct.
19. Defendants presented such allegations in a manner conveying to readers that Plaintiff had engaged in criminal, fraudulent, dishonest, or unethical conduct.
20. Defendants failed to reasonably investigate, verify, contextualize, or fairly present those accusations.

21. Defendants omitted material exculpatory facts and adopted a sensationalized narrative calculated to injure Plaintiff's reputation.
22. Defendants additionally published statements asserting or implying that Plaintiff "called for the decapitation of liberals," wished individuals "chained and muzzled," employed "anti-Semitic tropes," and engaged in violent, hateful, or extremist conduct.
23. The publications presented those accusations as factual recitations rather than protected opinion or rhetorical hyperbole.
24. Defendants further amplified the defamatory implications through headlines, embedded links, repeated republication, curated references to alleged misconduct, and related commentary.
25. Defendants knew, or acted with reckless disregard for whether, the publications conveyed false and defamatory implications concerning Plaintiff.
26. The publications were made to third parties through a widely read online publication with substantial readership and republication through social media and reader commentary.
27. The publications foreseeably exposed Plaintiff to hatred, distrust, ridicule, contempt, humiliation, and injury to his personal and professional reputation.
28. Under Florida law, a plaintiff alleging defamation must establish publication, falsity, fault, and damages, and where statements constitute defamation per se, damages are presumed. *Jews For Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1106–08 (Fla. 2008); *Lawnwood Med. Ctr., Inc. v. Sadow*, 43 So. 3d 710, 727–29 (Fla. 4th DCA 2010).

29. Florida law recognizes that statements falsely imputing criminal conduct, dishonesty, fraud, corruption, or conduct incompatible with one's business or profession constitute defamation per se. *Richard v. Gray*, 62 So. 2d 597, 598 (Fla. 1953).
30. Florida courts further recognize that a publication is actionable where the overall "gist" or "sting" of the statement is false or misleading, even where isolated underlying facts may be partially accurate. *Smith v. Cuban Am. Nat'l Found.*, 731 So. 2d 702, 706 (Fla. 3d DCA 1999).
31. Defamation may arise not only from express falsehoods but also from false implications, insinuations, misleading juxtapositions, and omissions that convey a defamatory meaning to readers. *Jews For Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1108 (Fla. 2008).
32. Defendants' publications conveyed the false and defamatory implication that Plaintiff engaged in corruption, abuse of office, fraud, dishonesty, financial misconduct, extremism, and other reprehensible conduct.
33. Although pure opinion is generally protected speech, statements implying undisclosed defamatory facts or objectively verifiable misconduct remain actionable under Florida law. *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 18–21 (1990).
34. Defendants presented the challenged statements as factual assertions supported by purportedly undisclosed facts, thereby rendering the statements actionable.
35. Defendants acted negligently, recklessly, and/or with actual malice in publishing the defamatory statements.
36. Actual malice may be established through purposeful avoidance of the truth, reliance on inherently unreliable accusations, deliberate distortion of known facts, or

failure to investigate where there are obvious reasons to doubt the veracity of a source. *Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 688–92 (1989); *Lawnwood Med. Ctr., Inc. v. Sadow*, 43 So. 3d 710, 728–30 (Fla. 4th DCA 2010).

37. Defendants ignored Plaintiff's denials, omitted contrary information, sensationalized disputed allegations, and published accusations despite serious doubts as to their truth.
38. Plaintiff is a private individual as to the specific matters at issue herein, or alternatively, if Plaintiff is deemed a limited-purpose public figure, Defendants acted with actual malice.
39. As a direct and proximate result of Defendants' conduct, Plaintiff suffered injury to his reputation, humiliation, emotional distress, mental anguish, loss of standing in the community, and economic harm.
40. The false statements accusing or implying criminality, fraud, corruption, dishonesty, professional misconduct, and reprehensible conduct constitute defamation per se.

COUNT I – DEFAMATION (LIBEL) (Against All Defendants)

41. Plaintiff realleges and incorporates paragraphs 1 through 40 as though fully set forth herein.
42. Defendants published false statements of fact concerning Plaintiff.
43. Defendants published false statements and defamatory implications that Plaintiff:
 - a. improperly attempted to evade law enforcement consequences;
 - b. abused public office or political influence;
 - c. engaged in fraud, dishonesty, corruption, or misappropriation of funds;
 - d. engaged in unethical or criminal conduct;
 - e. engaged in violent, hateful, extremist, racist, or anti-Semitic conduct; and

f. was professionally and personally disgraced.

44. The statements and defamatory implications were false and not substantially true.
45. The publications were not privileged.
46. Defendants published the statements negligently, recklessly, and/or with actual malice.
47. Defendants either knew the statements were false or acted with reckless disregard for their truth or falsity.
48. Defendants failed to use reasonable care to investigate or verify the accusations before publication.
49. Defendants further failed to retract, correct, or clarify the false and defamatory publications after receiving notice of their falsity.
50. The publications constitute defamation per se because they imputed to Plaintiff criminal conduct, dishonesty, fraud, corruption, misconduct incompatible with his business and profession, and conduct tending to expose him to hatred, contempt, ridicule, disgrace, or distrust.
51. Florida law recognizes that accusations tending to subject a person to hatred, distrust, ridicule, contempt, or disgrace, or tending to injure a person in his occupation or business reputation, are actionable without proof of special damages. *Campbell v. Jacksonville Kennel Club, Inc.*, 66 So. 2d 495, 497 (Fla. 1953); *Wolfson v. Kirk*, 273 So. 2d 774, 777 (Fla. 4th DCA 1973).
52. As a direct and proximate result of Defendants' defamatory conduct, Plaintiff suffered presumed damages and actual damages, including reputational injury, emotional distress, humiliation, mental anguish, and economic losses.

53. Defendants' conduct was intentional, malicious, willful, wanton, outrageous, and in conscious disregard of Plaintiff's rights.

WHEREFORE, Plaintiff Joe Mullins respectfully requests that this Court enter judgment in his favor and against Defendants, Pierre Tristam and FlaglerLive, Inc., and award the following relief:

- a. General damages in an amount to be determined at trial;
- b. Special damages in an amount to be determined at trial;
- c. Presumed damages for defamation per se;
- d. Punitive damages for willful, wanton, malicious, and reckless conduct, as permitted by Florida law including section 768.72, Florida Statutes;
- e. Costs of suit and attorneys' fees where recoverable;
- f. Prejudgment and post-judgment interest;
- g. Such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

DATED: May_____, 2026.

Respectfully submitted,

/s/ Anthony F. Sabatini
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