

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR POLK COUNTY, FLORIDA

GEORGE ZIMMERMAN,

Plaintiff,

CASE NO.: 2019-CA-004884000000

vs.

BENJAMIN CRUMP,
BRITTANY DIAMOND EUGENE,
HARPERCOLLINS PUBLISHERS, LLC,
RACHEL JEANTEL,
SYBRINA FULTON,
TRACY MARTIN.

Defendants.

SECOND AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, GEORGE ZIMMERMAN (hereinafter “Zimmerman”), through the undersigned attorney, hereby files this Second Amended Complaint and Demand for Jury Trial against the above-named Defendants, and alleges the following:

1. Plaintiff’s action is an action for damages in excess of the sum of FIFTEEN THOUSAND AND NO/100 (\$15,000.00) DOLLARS, exclusive of interests and costs.
2. George Zimmerman is the Plaintiff herein.
3. The acts or omissions giving rise to Plaintiff’s cause of action transpired in Polk County, State of Florida, as well as, all the State of Florida, the United States, and abroad.
4. Venue is proper in Polk County pursuant to Florida Statutes § 47.051, as Defendants, whom this action is brought against have agents and/or representatives in this County, and/or otherwise reside here, and/or Plaintiff’s cause of action accrued in this County.

PARTIES

5. Plaintiff George Zimmerman (“Zimmerman”), at all times material hereto, is and was an individual and a citizen and resident of the state of Florida and Polk County, FL.

6. Defendant Benjamin Crump (“Crump”), at all times material hereto, is and was the attorney for Defendants Tracy Martin and Sybrina Fulton. Crump is a resident and citizen of the state of Florida.

7. Defendant HarperCollins Publishers, LLC (“HarperCollins”) , at all times material hereto, is and was a New York corporation license and authorized to do, and actually does substantial business in all fifty (50) states, including the State of Florida. Service of process on Defendant was predicated on Fla. Stat. §48.081 and Fla. Stat. § 48.091.

8. Defendant Sybrina Fulton (“Fulton”), at all times material hereto, is and was the biological mother of Trayvon Martin (deceased), ex-wife of Defendant Martin, and a citizen and resident of the State of Florida.

9. Defendant Tracy Martin (“Martin”), at all times material hereto, is and was the biological father of Trayvon Martin (deceased), ex-husband of Defendant Fulton, and a citizen and resident of the State of Florida.

10. Defendant, Brittany Diamond Eugene (“Eugene”), at all times material hereto, is and was a citizen and resident of the state of Florida. Eugene was on the phone with Trayvon Martin (deceased) before the incident with Plaintiff occurred. Eugene is a relative of Defendant Rachel Jeantel.

11. Defendant Rachel Jeantel (“Jeantel”), at all times material hereto, is and was a citizen and resident of the State of Florida. Jeantel is a special needs woman and a relative of Defendant Eugene.

12. The facts pled in this Second Amended Complaint, which set forth the injuries suffered by Plaintiff, were only recently discovered by Zimmerman on or about September 16, 2019, through the publication of the book and film by director and writer Joel Gilbert, both

entitled *The Trayvon Hoax: Unmasking the Witness Fraud that Divided America*.

13. September 16, 2019 was the earliest possible date that Zimmerman could have, and did in fact, discover the subject illegal, fraudulent, and defamatory acts and practices of the Defendants which give rise to this cause of action.

14. On October 15, 2019, Zimmerman became aware of the book published by Defendants Crump and HarperCollins and disseminated widely, in this County, Florida, and nationally and internationally.

15. The above-named Defendant has, at all times material to this cause of action, through their own acts or that of their agents, officers and representatives, operated, conducted, engaged in and carried on a business venture in Florida; maintained an office or agency in this state; solicited business or provided service activities within this state, and/or committed a fraudulent and/or tortious acts within the state by defaming and fraudulently misrepresenting the truth regarding Zimmerman.

FACTS

16. In February of 2012, Zimmerman was 28 years old, married, and living at the Retreat at Twin Lakes townhome complex in Sanford, Florida.

17. After various robberies and home invasions at the Retreat at Twin Lakes townhome community, Zimmerman joined the neighborhood watch program to try to help reduce the amount of crime in the townhouse community.

18. In February of 2012, 17-year-old Trayvon was temporarily living with Defendant Martin after getting suspended from school for numerous instances of violence against other students and against a bus driver.

19. In February of 2012, 16-year-old Defendant Eugene was a sophomore in high

school and had begun a romantic relationship with Trayvon earlier that month.

20. In February of 2012, Defendant Jeantel was an 18-year-old ninth grader in the Exceptional Student Education Program because she was reading at a fourth-grade level and had failed two years of school.

21. On February 26, 2012, Zimmerman was driving to Target at around 7 PM when he spotted Trayvon standing in the rain between two townhomes and making no attempt to get out of the rain.

22. Zimmerman pulled over and called a non-emergency number that the neighborhood watch members had been advised to call.

23. Trayvon, while on the phone with Defendant Eugene, then approached and circled Zimmerman's parked car while Zimmerman was still speaking to the dispatcher. Trayvon then departed the area of Zimmerman's car and the dispatcher repeatedly asked Zimmerman which way the person had gone, prompting Zimmerman to get out of his car to try to assist the dispatcher.

24. Zimmerman answered "okay" in agreement after being asked by the dispatcher not to follow Trayvon and Zimmerman began walking back to his parked car.

25. When almost at his car, Trayvon appeared and approached Zimmerman from behind and called out "What's your problem?" As Zimmerman answered, "I don't have a problem," Trayvon immediately punched Zimmerman in the nose, breaking it, and straddled him as he fell to the ground.

26. Trayvon then began slamming Zimmerman's head onto the concrete sidewalk as Zimmerman yelled for help at least 14 times according to 911 audio recordings.

27. According to eyewitness, Jonathan Good, Trayvon was punching Zimmerman

“MMA Style” while Zimmerman was on the ground.

28. Zimmerman was disoriented and choking on blood from his broken nose. Fearing he would go unconscious from the continued bashing of his head onto the concrete sidewalk, he reached for his legal firearm and discharged a single shot to stop the assault. As he lay gravely injured, Trayvon requested of Zimmerman, “tell Mama ‘Licia I’m sorry,” before passing away.

29. Two days later, Defendant’s Fulton and Martin retained Defendant Crump as their attorney.

30. On March 12, Sanford Florida Police Chief Bill Lee announced the results of their investigation into the February 26 shooting at a public press conference. Lee explained that the Sanford police investigation had included extensive interviews with Zimmerman, with eye-witness Johnathan Good, numerous Retreat at Twin Lakes residents, reviews of 911 calls, examination of the physical evidence of Zimmerman’s broken nose and head lacerations and Trayvon’s bruised knuckles, and the location of the altercation. Lee declared the investigation concluded the shooting was an act of self-defense and there were no ground to arrest Zimmerman.

31. On March 13, despite the police investigation of the evidence exonerating Zimmerman, on information and belief, Defendant Crump requested the NAACP to write a letter to the DOJ requesting an investigation into the shooting, which resulted in the dispatch of the Community Relations Service (“CRS”) of the DOJ to Sanford, Florida.

32. During this time and despite all evidence to the contrary, in order to defame Zimmerman, incite the public against him, and influence phone witness Defendant Eugene, Defendant Crump repeatedly disseminated into the media a knowingly false narrative that during the events of February 26, that Trayvon: 1) was only buying candy for his little brother, 2) was

just trying to get home, when he was 3) was stalked by Zimmerman because of his skin color and then 4) was shot in cold blood by Zimmerman after yelling repeatedly for help.

33. Defendant Crump repeated his false narrative often and, in doing so, successfully coerced the media, politicians, celebrities, and even fair-minded people into demanding the arrest of Zimmerman with no evidence, and even though he'd already been exonerated by the police investigation.

34. In the evening of March 18, Defendant Eugene was finally coerced under pressure into agreeing to make an on the record statement incriminating Zimmerman. Defendant Eugene tweeted about the extreme duress she was under, "Can't believe this is happening to me. Crying." She was instructed to meet with Defendants Fulton and Crump the next day after school at Defendant Fulton's home.

35. According to Defendant Fulton's April 2, 2012 statement to police, after school that day, Defendant Eugene was dropped off at Defendant Fulton's house. Defendant Fulton explained to police that Defendant Eugene spoke with her at length (Defendant Crump later indicated he also had met with Defendant Eugene at this time).

36. Also, according to Defendant Fulton's April 2, 2012 statement to police, Defendant Fulton then drove Defendant Eugene back to her house where Defendant Fulton said she spoke with Defendant Eugene's mother, whom Defendant Fulton told police had requested that Defendant Eugene's identity be kept private.

37. The evening of March 19, Defendant Eugene declined Defendants Fulton and Crump's request to return to Defendant Fulton's house for an on-camera ABC-TV interview. Instead, she allowed for a recorded over the phone interview with Defendant Crump.

38. In that 20-minute recorded phone interview, Defendant Crump openly coached

and led Defendant Eugene into repeating his false narrative of events he had been pushing in the media for several weeks. In that recorded call, Defendant Eugene repeated almost word for word Defendant Crump's false narrative that Trayvon was just trying to get home with candy for his little brother when attacked by Zimmerman based on skin color, even though she knew this not to be true. Defendant Eugene also answered many of Defendant Crump's questions in the affirmative, even though she knew them not to be true.

39. On March 20, 2012, Defendant Crump held a press conference. Defendant Crump played for the press excerpts from his recorded call with Defendant Eugene in which she implicated Zimmerman with Defendant Crump's false media narrative. Defendant Crump declared to the press, “we have all the evidence now!” and “arrest George Zimmerman for the murder of Trayvon Martin!”

40. On March 21, 2012, Defendant Crump appeared on the Today Show with Defendants Fulton and Tracy Martin. Defendant Crump told Matt Lauer that Trayvon's girlfriend was “a 16-year-old teenager.” Defendant Crump also appeared on Court TV. When asked how he discovered Trayvon’s girlfriend out of the blue after the police had already investigated, Defendant Crump inadvertently admitted the existence of the weeks long coordinated pressure campaign against Defendant Eugene when he stated on air, “This interview happened because we pushed her making a statement.”

41. On April 2, 2012, Prosecutors and police arrived at Defendant Fulton’s home at around 3:20 PM. Defendants Fulton and Tracy Martin were interviewed. This is when Defendant Fulton made the statements to police about her interactions with Defendant Eugene on March 19, 2012, including Defendant Fulton’s statement that Defendant Eugene had been dropped off at her house and that Defendant Fulton had driven Defendant Eugene back to her home later in the

afternoon of March 19, 2012 and spoken to her mother.

42. After Defendant Fulton's interview with police was over, Defendant Fulton directed the prosecutors and police to Defendant Eugene's home at 2648 Flamingo Drive in Miramar to pick her up for an interview with prosecutors. Defendant Fulton knew the address from having driven her home on March 19, 2012.

43. Arriving at Defendant Eugene's home at 2648 Flamingo Drive in Miramar, prosecutors and police were told Defendant Eugene was not at home, but rather she was visiting at the home of Defendant Fulton's worker, Francine Serve, at SW 3958 52nd Avenue, Apt 2. Prosecutors, police and Defendant Fulton left Defendant Eugene's house and arrived at SW 3958 52nd Avenue, Apt 2 at "approximately 6:30 PM" to pick up Defendant Eugene to be interviewed.

44. Defendant Fulton later stated in her 2013 deposition, "I knocked on the door and asked for Diamond." However, rather than Defendant Eugene coming to the door, Defendant Jeantel appeared and claimed that she was "Diamond Eugene." Defendant Eugene could in no way be mistaken for Defendant Jeantel, who was 2 years older, 5 inches taller, and about 120 pounds heavier than Defendant Eugene. Defendant Fulton saw Defendant Jeantel and immediately called Defendant Eugene, who tweeted at about that same time at 6:27 PM "Trayvon Martin Mom just called me" and at 6:32 PM "She thought I was Trayvon Girlfriend, Asking Me Hella Questions. Confused."

45. Defendant Jeantel was then driven to Defendant Fulton's house where Prosecutor de la Rionda interviewed Defendant Jeantel in a sworn statement and allowed the victim's mother, Defendant Fulton, to sit next to Defendant Jeantel during the interview.

46. In the interview, Defendant Jeantel lied repeatedly in order to incriminate

Zimmerman. Defendant Jeantel falsely claimed to be Trayvon's girlfriend, falsely claimed that her nickname was "Diamond," and falsely claimed that she was on the phone with Trayvon in the days leading up to and much of the day and up to the minute of his death. Defendant Jeantel made numerous false statements about what she claimed to have heard while speaking with Trayvon with the goal of incriminating Zimmerman for the purpose of having him falsely arrested, tried, and convicted of murder and sentenced to life in prison.

47. In her two sworn depositions of March 13 and April 24, 2013 with Zimmerman's defense attorneys, on each of these two dates, Defendant Jeantel lied repeatedly about having a relationship with Trayvon, about being on the phone with Trayvon in the days and minutes up to his death, and lied about everything she claimed to have heard over the phone in the hours and minutes prior to Trayvon's death. Defendant Jeantel also lied about her identity, falsely claiming her nickname to be "Diamond Eugene." She also lied about signing the letter as "Diamond Eugene" which was given by Defendant Eugene to Defendant Fulton.

48. On March 14, 2013, Defendant Tracy Martin lied repeatedly in his sworn deposition with Zimmerman's defense attorneys in order to mislead Zimmerman's defense team regarding his interactions on the phone with Defendant Eugene on March 17 and March 18, 2012 and his meeting in person with Defendant Eugene on March 19, 2012. Defendant Tracy Martin also lied about having no knowledge of the letter Defendant Eugene delivered to Defendant Fulton on March 19, 2012, which he admitted four years later in his book was read out loud to him, in order to further the conspiracy of the witness switch from the legitimate phone witness Defendant Eugene to the imposter and fake witness Defendant Jeantel for the purpose of causing an arrest and prosecution of Zimmerman for murder and causing him to be sentenced to prison for life.

49. In Defendant Fulton's sworn deposition with Zimmerman's defense attorneys on March 15, 2013, Defendant Fulton lied repeatedly about the circumstances, events, and persons in question to cover up the identity of phone witness Defendant Eugene, and her knowledge that Defendant Jeantel was not Defendant Eugene.

50. Defendant Fulton lied repeatedly and often to cover up her two meetings in person with Defendant Eugene, about her speaking with her Defendant Eugene's mother Eliana Eugene, and regarding her knowledge of facts and events surrounding her many interactions with Defendant Eugene both in person and on the phone.

51. Defendant Fulton also lied repeatedly about the circumstances of receiving the handwritten letter from Defendant Eugene and signed "Diamond Eugene", about the content of the letter, and lied about why she hid the critical evidence from police until forced to produce it at her deposition just before the trial. On information and belief, Defendant Fulton hid this evidence in order to prevent the defense from an opportunity to run handwriting analysis that would have revealed that Defendant Jeantel did not sign the name "Diamond Eugene", and in order to keep the conspiracy against Zimmerman from unraveling.

52. During the trial of Zimmerman, Defendant Jeantel appeared in court and testified for two days. She lied repeatedly on the witness stand by pretending to be "Diamond Eugene" and lied about all events and circumstances regarding Trayvon, her relationship with Trayvon, and the circumstances leading up to his death by falsely claiming she was a phone witness to them, when she was not, in order to incriminate Zimmerman for murder and send him to prison for life as part of a conspiracy with the others named in this action. Defendant Jeantel also falsely claimed she had given the letter to Defendant Fulton and that she had signed the letter given to Defendant Fulton as "Diamond Eugene," even though she did neither.

53. On July 30, 2018, the six-part documentary television series *Rest in Power: The Trayvon Martin Story* premiered on Paramount Television and was simulcast on Black Entertainment Television. In Episode Two, entitled *The Elephant in the Room*, broadcast on August 6, 2018, Defendant Jeantel appeared on camera pretending to be Defendant Eugene and again falsely claimed she was on the phone with Trayvon on February 26, 2012 in the minutes before the attack on Zimmerman. Defendant Jeantel falsely claimed that Trayvon had told her Zimmerman had followed Trayvon. Defendant Jeantel further repeated word for word the made-to-order false statements from her perjured testimony in 2012, including that she heard Zimmerman say to Trayvon “What are you doing around here?” in order to defame Zimmerman as the aggressor in the altercation with Trayvon and her prior false claims that Zimmerman had pursued Trayvon and confronted him, leading to his death.

54. Episode Four of the six-part documentary television series *Rest in Power: The Trayvon Martin Story* that premiered on Paramount Television and was simulcast on Black Entertainment Television was broadcast on August 27, 2018. In this episode entitled *The Burden of Proof*, Defendant Fulton appears on camera. In order to further the conspiracy to defame and implicate Zimmerman, Defendant Fulton vouched for the credibility of Defendant Jeantel, whom she knew was not on the phone with Trayvon and whom she knew was a fake witness and imposter in the 2013 trial of George Zimmerman. Defendant Fulton said of Defendant Jeantel on camera, “She was on the phone with Trayvon seconds before he was shot. She just wanted to tell what happened with her friend, what she remembered, what she heard.”

55. On October 15, 2019, Defendant Crump released a book, published by Defendant HarperCollins, with a reckless, racially charged, inflammatory and defamatory title, *Open Season: Legalized Genocide of Colored People*. Given Defendant Crump’s widely known

knowledge of, participation in and association with Plaintiff Zimmerman and the Trayvon Martin trial, the title of the book is reasonably understood by the reader to refer to Plaintiff Zimmerman. This creates the false implication that Plaintiff Zimmerman participated and participates in the “genocide of colored people.”

56. Defendant Crump publicized and personally promoted this book in both Florida and New York, among other locations around the nation, and continues to do so to this date.

57. The book itself also contains numerous false, malicious, and defamatory statements regarding Plaintiff Zimmerman. In order to encourage sales of a book with a title stating that murder of African Americans is legal.

**COUNT I – CIVIL CONSPIRACY TO COMMIT FRAUDULENT
MISREPRESENTATION**

As to DEFENDANTS CRUMP, FULTON, MARTIN, JEANTEL, AND EUGENE

Plaintiff adopts, realleges and incorporates the allegations in paragraphs 1 through 6, and 8 through 57 above, and further alleges the following:

58. Defendants Crump, Fulton, Martin, Jeantel, and Eugene, individually and/or collectively continued their fraud and/or conspiratorial acts despite knowing that Defendant Eugene was an essential witness to the self-defense of Zimmerman, as she was the person who was actually on the phone with Trayvon immediately before and during Trayvon’s interaction with Zimmerman.

59. Defendants Crump, Fulton, Martin, Jeantel, and Eugene individually and/or collectively continued their fraud and/or conspiratorial acts to unlawfully have Defendant Jeantel lie to the Florida Department of Justice claiming to be the witness who was on the phone with Trayvon right before the confrontation with Zimmerman

60. Defendants Crump, Fulton, Martin, Jeantel, and Eugene individually and/or

collectively continued their fraud and/or conspiratorial acts to unlawfully convince the Florida Department of Justice have Defendant Jeantel testify as the witness who was on the phone with Trayvon right before the confrontation with Zimmerman.

61. Defendants Crump, Fulton, Martin, Jeantel, and Eugene individually and/or collectively continued their fraud and/or conspiratorial acts were successful in ensuring that Defendant Jeantel testify at trial against Zimmerman, instead of the real Diamond Eugene, Defendant Eugene.

62. The aforementioned information and/or knowledge concealed and/or suppressed by the Defendants Crump, Fulton, Martin, Jeantel, and Eugene, and its co-conspirators, was material information which Defendants were under a duty to disclose and/or which it had assumed the duty of disclosing.

63. The aforementioned information and/or knowledge concealed and/or suppressed by the Defendants Crump, Fulton, Martin, Jeantel, and Eugene, and its co-conspirators was concealed for the purposes of inducing the Department of Justice and the potential jury at trial to wrongfully convict Zimmerman and destroy his good will and reputation in the community.

64. As a direct and proximate result of the aforementioned concealment and/or suppression of material information, and fraudulent misrepresentations by Defendants Crump, Fulton, Martin, Jeantel, and Eugene, and their co-conspirators, Zimmerman was arrested, charged with murder, tried, in front of the world, which resulted in and directly caused him to suffer damages, including but not limited to, pain and suffering, mental anguish, loss of capacity to lead and enjoy a normal life, expense of medical care and treatment, loss of earnings, loss of ability to earn money. The damages, injuries and losses are permanent and continuing in nature, and Plaintiff has suffered these losses.

65. As a direct and proximate result of the aforementioned concealment and/or suppression of material information, and fraudulent misrepresentations by Defendants Crump, Fulton, Martin, Jeantel, and Eugene, and their co-conspirators, Zimmerman has suffered loss of reputation.

COUNT II – FRAUDULENT MISREPRESENTATION

As to DEFENDANTS CRUMP, FULTON, MARTIN, JEANTEL, AND EUGENE

Plaintiff adopts, realleges and incorporates the allegations in paragraphs 1 through 6 and 8 through 57 above, and further alleges the following:

66. As counsel for Defendants Fulton and Martin, Crump knew about Defendant Eugene, as he stated on a television interview “She is a minor. She is a 16-year-old girl.” Defendant Eugene was a 16-year-old girl. Defendant Jeantel was 18 at the time.

67. Despite knowing Defendant Jeantel was not on the phone with Trayvon, Defendant’s Crump, Fulton, Martin, Eugene, and Jeantel all agreed to convince the Florida Department of Justice to put Jeantel on the stand as if she was Defendant Eugene.

68. Defendants Crump, Fulton, Martin, Eugene, and Jeantel agreed and conspired to produce a lying and false-witness, Defendant Jeantel, to the Florida Department of Justice in order to attempt to obtain a conviction against Zimmerman.

69. Defendant Jeantel took the stand and recited a made-to-order false storyline conjured by Defendants Crump, Fulton, Martin with the intention that her false representations induce the jury to convict Zimmerman.

70. As a direct and proximate result of the aforementioned fraudulent misrepresentation by Defendants Crump, Fulton, Martin, Jeantel, and Eugene, and their co-conspirators, Zimmerman was arrested, charged with murder, tried, in front of the world, which

resulted in and directly caused him to suffer damages, including but not limited to, pain and suffering, mental anguish, loss of capacity to lead and enjoy a normal life, expense of medical care and treatment, loss of earnings, loss of ability to earn money. The damages, injuries and losses are permanent and continuing in nature, and Plaintiff has suffered these losses.

COUNT III – CIVIL CONSPIRACY TO DEFAME

As to CRUMP, FULTON, JEANTEL, MARTIN, AND HARPERCOLLINS

Plaintiff adopts, realleges and incorporates the allegations in paragraphs 1 through 8, and 9 through 57 above, and further alleges the following:

71. Defendants Crump, Fulton, Jeantel, Martin, and HarperCollins conspired to unlawfully spread the false narrative that Zimmerman is a racist murderer that racially profiled Trayvon and “chased” him despite being told not to.

72. Defendants Crump, Fulton, Jeantel, Martin, and HarperCollins overtly repeated these lies to the public through television, news articles, and in published books.

73. As a direct and proximate result of the aforementioned conspiracy by Defendants Crump, Fulton, Jeantel, Martin, and HarperCollins, and their co-conspirators, Zimmerman was arrested, charged with murder, tried, in front of the world, which resulted in and directly caused him to suffer damages, including but not limited to, pain and suffering, mental anguish, loss of capacity to lead and enjoy a normal life, expense of hospitalization, medical care and treatment, loss of earnings, loss of ability to earn money. The damages, injuries and losses are permanent and continuing in nature, and Plaintiff has suffered these losses.

COUNT IV – DEFAMATION

As to CRUMP, FULTON, JEANTEL, MARTIN, AND HARPERCOLLINS

Plaintiff adopts, realleges and incorporates the allegations in paragraphs 1 thorough 8 and 10 through 57 above, and further alleges the following:

74. Crump wrote and published, through HarperCollins, a book titled *Open Season: The Legalized Genocide of Colored People* (hereinafter “Open Season”).

75. Crump made false statements about Zimmerman in his book *Open Season*.

76. In *Open Season*, Crump included statements about Zimmerman that Crump knew were false and defamatory, such as “the neighborhood watch volunteer chased him and shot him,” and “Testimony at the trial revealed that law enforcement ordered Zimmerman not to pursue the teen and to stand down until police arrived. Zimmerman continued to pursue Trayvon.”

77. Crump described Zimmerman as a racist by suggesting that Zimmerman “fear[ed] Trayvon Martin simply because he was a young Black kid walking in their gated community.”

78. Defendant Crump knew these statements were false, while Defendant HarperCollins had reason to know that the statements were false or at a minimum acted negligently and with reckless disregard for the truth.

79. Crump’s statements that Zimmerman followed Trayvon because of the color of Trayvon’s skin has led to widespread belief that Zimmerman is a racist and a bigot.

80. Defendant Crump led the narrative that this was a hate-crime by a white man who followed an innocent black teenager solely because of the color of his skin and Defendant HarperCollins gave Crump a platform to further push this lie out to the public. When the truth is that Zimmerman is a Hispanic man who tried to de-escalate the situation before he had to use self-defense in order to prevent serious bodily injury or death to himself.

81. In the 2018 documentary broadcast TV series, called *Rest in Power*, named after the 2017 book written by Defendants Fulton and Martin, Defendant Jeantel appeared on camera and falsely claimed that Trayvon had told her Plaintiff Zimmerman had followed Trayvon, and she repeated word for word the made-to-order false statements from her perjured testimony in

2012, thus further defaming and disparaging Zimmerman. In this TV show, Defendant Fulton also appeared on camera and vouched for the credibility of Defendant Jeantel, even though she knew Defendant Jeantel was lying and was not Defendant Eugene, thus further defaming and disparaging Zimmerman in the 2018 TV series.

82. Additionally, Fulton made defamatory statements about Zimmerman on May 18, 2020, as a guest on an episode of the Urban AC Morning Show, a nationally broadcast radio show on Westwood One hosted by “Rick and Sasha”. When asked about the death of Trayvon Martin and referring to George Zimmerman, Sybrina Fulton stated, “You had a 28 year old man who thought that it was okay for me to chase this teenager and shoot and kill him.”

83. Defendants Fulton, Martin, and Jeantel knew that their statements were false.

84. The heinous accusations that Zimmerman’s actions were because of the color of Trayvon’s skin served to escalate the false narrative that Zimmerman is an intolerant, hateful, and racist.

85. Each and every of the aforementioned allegations and statements regarding Zimmerman were and are false, and stated and published solely to for the purpose of defaming Zimmerman.

86. As a direct and proximate result of the aforementioned defamatory statements made by Defendants Crump, Fulton, Martin, Jeantel, and HarperCollins, and their co-conspirators, Zimmerman’s reputation is permanently tarnished across the entire United States. Zimmerman has survived an assassination attempt, received death threats, threats of violence, and is essentially “unemployable.”

87. As a direct and proximate result of the aforementioned defamatory statements made by Defendants Crump, Fulton, Martin, Jeantel, and HarperCollins, and their co-

conspirators, Zimmerman was arrested, charged with murder, tried, in front of the world, which resulted in and directly caused him to suffer damages, including but not limited to, pain and suffering, mental anguish, loss of capacity to lead and enjoy a normal life, expense of hospitalization, medical care and treatment, loss of earnings, loss of ability to earn money. The damages, injuries and losses are permanent and continuing in nature, and Plaintiff has suffered these losses.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff for judgment against Defendants for compensatory damages against Defendants, for Plaintiff's fees and costs expended herein, and for such other and further relief both at law and in equity to which Plaintiff may show to be justly entitled.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically through the Florida E-Portal System and served on all attorneys of record for each respective party on this 12th day of August 2020.

MARTIN PEDATA, P.A.

/s/Martin Pedata
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