

IN THE CIRCUIT COURT OF THE ELEVENTH CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO.:

JAMES BUSH III,

Plaintiff,

vs.

EDGE COMMUNICATIONS, LLC, a
Florida limited liability company;
STRONG COMMUNITY, a political
action committee, and
FLORIDA HOUSE DEMOCRATIC
CAMPAIGN COMMITTEE, an affiliated
party committee, and ASHLEY GANTT,
an individual.

Defendants.

_____ /

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff **JAMES BUSH III** files this Complaint and sues **EDGE COMMUNICATIONS, LLC**, a Florida limited liability company; **STRONG COMMUNITY**, a political action committee; **FLORIDA HOUSE DEMOCRATIC CAMPAIGN COMMITTEE**, an affiliated party committee, and **ASHLEY GANTT**, for damages, demands a trial by jury, and hereby states as follows:

INTRODUCTION

Plaintiff, **JAMES BUSH III**, has been a dedicated public servant to this community and the State of Florida for over 50 years. He is deeply committed to serving his constituents—residents, church members, educators, union workers, and professionals from all walks of life.

For the past three years, Mr. Bush has faced relentless public attacks and the distribution of misinformation and misrepresentation by Defendants. These actions display him as a “bad person” and have led to public ridicule from his constituents and community members.

The ongoing public ridicule and distribution of misinformation have caused significant distress to Mr. Bush and his family which has negatively impacted his reputation and personal life.

The Defendants, individually and through entities they direct or their agents, have shamelessly and relentlessly disseminated lies through various channels, including mail-outs, electronic communications and phone calls.

The political advertisement was influential and negatively affecting Plaintiff Mr. Bush III run for re-election resulting in the loss of his election for State Representative for District 109.

PARTIES, JURISDICTION, AND VENUE

1. This is an action seeking damages exceeding \$1,000,000.00 and other relief by Plaintiff for libel and defamation to the Plaintiff’s reputation.
2. Plaintiff, **JAMES BUSH III**, is over the age of 18, and a resident of Miami-Dade County, Florida, and otherwise sui juris.
3. Upon information and belief, Defendant **EDGE COMMUNICATIONS, LLC**, is a limited liability company with a principal place of business in Miami, Florida.
4. Upon information and belief, Defendant **STRONG COMMUNITY**, a political action committee, is a political action committee operating in Florida, with its address listed as 1742 W Flagler St Miami, FL 33135.

5. Upon information and belief, Defendant **FLORIDA HOUSE DEMOCRATIC CAMPAIGN COMMITTEE**, is an affiliated party committee operating in Florida, with its address listed as PO Box 1701, Tallahassee, FL 32303.
6. **ASHLEY GANTT** is a member of the Florida House of Representatives, representing House District 109 in Miami-Dade County.
7. This Court has personal and subject matter jurisdiction over the parties and this action.
8. Venue is proper in Miami-Dade County, Florida, as the Defendants conducted business and/or distributed the defamatory statements within this county, and the Plaintiff resides herein.
9. All conditions precedent have been met, waived, or are otherwise inapplicable, including all statutory requirements, if any.

FACTUAL ALLEGATIONS

10. Plaintiff, **JAMES BUSH III**, has an impeccable reputation within his community as a lifelong public servant.
11. The Defendants have made maliciously false statements about the Plaintiff that have damaged his reputation. The statements were made via-mail-in political campaign ads, electronically, and through phone calls.
12. The defamatory statements by the Defendants were made knowing their falsity but nonetheless done with intent to harm and injure Plaintiff personally and in his capacities as a public servant.
13. Despite knowing their falsity, the Defendants persisted in uttering and publishing the false statements and did so with intent to injure the Plaintiff.

14. The defamatory statements were purported by the Defendants to be statements of fact and were not opinion.
15. These are only the latest in an ongoing and utterly despicable campaign by the Defendants of slander, lies, and false information, all done for the benefit of the Defendants.
16. The defamatory and false statements circulated include, but not limited to, the following false claims against Mr. Bush:
- a. “JAMES BUSH SOLD US OUT TO RADICAL REPUBLICANS”
 - b. “WHILE RON DESANTIS ATTACKED OUR RIGHT TO VOTE, OUR RIGHT TO REPRODUCTIVE HEALTHCARE, AND OUR RIGHT TO SPEAK UP AGAINST INJUSTICE... HIS FAVORITE “DEMOCRAT” JAMES BUSH III STOOD WITH DESANTIS AND SOLD US OUT” **(Strong Community)**
 - c. “HE VOTED TO BAN ABORTION, ROLL BACK OUR RIGHTS, AND PUT WORKERS AT RISK” **(Strong Community)**
 - d. “We have NOT forgotten the REAL James Bush. All of James Bush’s votes were to: BAN ABORTION, UNION BUSTING, SUPPORT DESANTIS AGENDA, HINDER PUBLIC EDUCATION FUNDING. In the August primary election, reject DeSantis Democrat James Bush.” **(Florida House Democratic Campaign Committee)**
 - e. “WE HAVEN’T FORGOTTEN THE REAL JAMES BUSH. BANNING ABORTION. STANDING WITH RON DESANTIS AS HE ATTACKED OUR HISTORY. ATTACKING UNIONS AND WORKING FAMILIES. WE CAN’T

**GO BACK TO DESANTIS DEMOCRAT JAMES BUSH” (Florida House
Democratic Campaign Committee).**

17. All these statements are not only false and known or reasonably believed to be false or done while the Defendants harbored serious doubts about their truth but were done with malicious purpose of causing harm to the Plaintiff.
18. Each of the Defendants knew that these statements were false, but yet they collectively and working in concert chose to make these false statements maliciously and for the sole purpose of inflicting harm on the Plaintiff, a man of impeccable honor and integrity.

COUNT I – LIBEL

19. Paragraphs 1 through 18 are realleged as if fully set forth herein.
20. This is an action for libel.
21. The statements made by the Defendants contained false, scandalous, and defamatory statements concerning the Plaintiff.
22. The statements were published and disseminated to third parties.
23. All the statements were false and made by the Defendants with knowledge of their falsity or reckless disregard for the truth.
24. All the statements were made by Defendants with the primary malicious purpose of causing injury to the Plaintiff in his representative, activist, personal, and social life.
25. For these reasons, Plaintiff demands judgment against Defendants for damages together with an award of costs. Plaintiff demands a trial by jury on all issues so triable by jury as of right.

WHEREFORE, Plaintiff, **JAMES BUSH III**, respectfully requests that this Honorable Court enter judgment in his favor and against all Defendants for damages together with an award of costs. Plaintiff demands a trial by jury on all issues so triable by jury as of right.

COUNT II – LIBEL PER SE

26. Paragraphs 1 through 16 are realleged as if fully set forth herein.

27. This is a count for libel per se.

28. The statements that are the subject of this complaint are false, scandalous, and defamatory concerning Plaintiff.

29. Defendants circulated the false statements to third parties.

30. The false statements circulated by Defendants exposed Plaintiff to distrust, disgrace, hatred, contempt, ridicule, and obloquy by the public.

31. The statements were purposely targeted by the Defendants to and did cause destruction to Plaintiff as a citizen and representative.

32. The statements are further defamatory per se in that they imputed to the Plaintiff characteristics incompatible with the proper exercise of his participation as a citizen and public official. More specifically, the statements falsely accused the Plaintiff of committing criminal, dishonest, and deceitful acts.

33. All the statements were false and made by the Defendants with knowledge of their falsity or reckless disregard for the truth.

34. All the statements were made by Defendants with the primary malicious purpose of causing injury to the Plaintiff in his representative, activist, personal, and social life.

35. For these reasons, Plaintiff demands judgment against Defendants for damages together with an award of costs. Plaintiff demands a trial by jury on all issues so triable by jury as of right.

WHEREFORE, Plaintiff, **JAMES BUSH III**, respectfully requests that this Honorable Court enter judgment in his favor and against all Defendants for damages together with an award of costs. Plaintiff demands a trial by jury on all issues so triable by jury as of right.

DEMAND FOR JURY TRIAL

Plaintiff **JAMES BUSH III** hereby demands a trial by jury of all issues so triable as a matter of law.

Dated 11th day of August, 2025.

Respectfully submitted,

MICHAEL A. PIZZI, JR, P.A.
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By: /s/ Michael A. Pizzi, Jr.
MICHAEL A. PIZZI, JR, ESQ.