

and the full weight of the Georgia political establishment at his back. Prediction markets had Jones at 75%. Insiders were whispering Jones might not even need a runoff.

2. But then something happened that Jones did not expect – Rick Jackson entered the race. Now Jones is losing. Badly. Jones knows it, and Jones is desperate.

3. Rather than standing on his record, fighting like an honest man, and earning the trust and support of Georgians, Burt Jones is resorting to what he knows best: cheap and dirty politics. In a fair fight, Jones loses 10 out of 10 times. But, just maybe, if Jones and his Campaign can trick and confuse Georgia voters with “hot button” deliberate, desperate, and blatant lies about Rick Jackson, then Jones has a shot. This cannot stand. Jones and his Campaign must be forced to fight on a level, fair playing field – Georgians deserve it. Jones must be held accountable for his malicious lies meant to corrupt the Republican primary.

4. Enough is enough – Mr. Jones, start fighting like an honest man, not a loser.

Georgia Republicans Give Jackson Instant Momentum

“Rick Jackson’s campaign for governor resets fight for MAGA base in Georgia.”
-Atlanta Journal-Constitution, February 9, 2026

“A newcomer who entered the race just weeks ago has sprinted to the top.”
-Georgia Recorder Writer Niles Francis, February 21, 2026

“Businessman Rick Jackson’s entry appears to have reshaped the race.”
-Emerson College Polling, March 5, 2026

5. Rick Jackson’s life is the stuff of the American Dream. Jackson is, in every meaningful sense, the living embodiment of the conservative values Georgia Republicans hold dear. Those are the same values that President Trump has championed since the moment the President told the political establishment their reign was over.

6. Jackson grew up in Techwood Homes – Atlanta’s most notorious public housing project – with an alcoholic mother and no safety net. Jackson entered the foster care system as a teenager. He could not afford to finish college. Overcoming these challenges, Jackson built Jackson Healthcare into one of the largest healthcare staffing companies in the United States: over \$3 billion in annual revenue, thousands of Georgians employed at good wages, more than thirty-five companies founded, foster care reform championed, and free college tuition for Georgia foster youth made possible by Jackson.

7. Quickly realizing that Burt Jones would be a disaster as governor for Georgia, the home that Jackson cherishes, on February 3, 2026, Jackson pledged \$50 million of his own money and entered the governor’s race as a conservative outsider. Rick Jackson did this to give back to – and fight for – Georgians. Rick Jackson is the kind of man who has never had anyone hand him anything. Instead, Jackson has fought his entire life against, and defeated, the odds. Jackson has done so with the utmost integrity, earning the trust and support of Georgians the right way.

8. Burt Jones is, by contrast, everything the conservative outsider movement has been fighting against. Jones was born with a silver spoon in his mouth, the heir to Jones Petroleum Company. Jones spent over a decade as a career politician with ten years in the Georgia State Senate before becoming the lieutenant governor in 2022. Jones entered this governor’s race expecting a coronation. But no amount of money or unearned privilege could manufacture for Jones the genuine support of Georgia Republican voters once they had a real choice.

9. Georgia Republicans are flocking to Rick Jackson. Freely. Decisively. The moment they had the chance.

10. As soon as Jackson entered the race on February 3, 2026, the numbers moved in his favor – and the momentum continues. Within forty-eight hours, prediction markets slashed

Jones's odds from 65% to 47%. Within a week, the first post-entry poll showed Jackson at 16%, built from zero. Co/efficient had flipped the race entirely: Jackson 24%, Jones 16%. The Atlanta Journal-Constitution put it plainly: *"It already feels like a new race."*

11. The meteoric momentum for Jackson and catastrophic free fall for Jones kept going. By February 13, Jackson led Jones on prediction markets. By February 19, Quantus Insights showed Jackson ahead among decided voters 32.6% to Jones's 16.9%. By late February, Kalshi had Jackson at 56% with Jones tumbling to 25%. By March 1, Jackson had reached 60%. And, among voters who call themselves Trump Republicans (the very voters Jones has claimed as his base), Jackson led Jones 32% to 18%. Georgia's MAGA voters are not with Burt Jones. They are with Rick Jackson.

12. Consider what that means. Burt Jones had a Trump endorsement, a year-long head start, and nearly \$16 million in the bank. Rick Jackson had been in this race for thirty days. And Jackson was winning. The momentum was overwhelming.

A Rigged Game; Remedied in a Federal Courtroom

13. Jackson is dedicated to ensuring Georgians are afforded a fair election process. Jackson displayed his dedication to fighting for a fair election process by filing an action in federal court and exposing something every Georgia Republican voter deserved to know. The leadership committee law Jones had quietly exploited gave him an unconstitutional fundraising advantage unavailable to any other candidate in this race. Jones used it to build a \$15.9 million account – nearly five times the size of his regular campaign committee – that Jackson's federal court lawsuit aptly described as a *"super-duper campaign committee"* no opponent could match. But the federal court stopped Jones's efforts to unfairly tip the election in his favor.

14. On February 20, 2026, U.S. District Judge Thomas W. Thrash, Jr. granted a temporary restraining order from the bench. On February 27, Judge Thrash put it in writing: Jones's leadership committee was barred from raising or spending another dollar on his campaign. The ads already purchased were ordered to be assumed by Jones's official candidate committee or cancelled. The \$15.9 million war chest Jones had spent years accumulating, his entire financial firewall, was frozen by a federal court.

15. Burt Jones built his financial advantage on a foundation he had no constitutional right to possess. Rick Jackson tore it down in open court, for every Georgia Republican voter to see. That made Jones even more desperate. And Jones retaliated, with malice, through bold-faced lies intended to destroy Jackson's hard-earned reputation.

The Lie That Told the Truth About Burt Jones

16. Jones was stripped of his financial firewall – and seeing the polls move against him every single week. Jones's self-proclaimed "MAGA base" had chosen the outsider over the establishment personified. Burt Jones arrived at the moment every failing candidate eventually reaches: the moment he had nothing left to run on.

17. And that is when Jones decided to lie.

18. On the morning of March 5, 2026, WSAV published the Emerson College poll showing Jones and Jackson neck-and-neck among Republican primary voters – a self-made businessman with no political experience, thirty days into the race, dead even with the career politician who had been running for over a year. The headline circulated statewide before noon: *"Rick Jackson Shakes Up GOP Primary for Governor, New Poll Shows."*

19. There is no denying it. Jones saw that headline and understood exactly what it meant. And within hours, Jones did what desperate people do when the truth is not working in their favor: he manufactured a different one.

20. Jones and his Campaign published a statement to the official *Burt Jones for Georgia* account on X – tagging Rick Jackson by name, on a public forum viewable by millions – accusing Jackson of having “made his fortune recruiting for Planned Parenthood” and “helping doctors perform transgender procedures on minors.”

21. It is a lie. A disgusting lie. The accusations are knowingly **false**. Rick Jackson has no professional relationship with Planned Parenthood. Jackson has never “helped” transgender procedures on minors. Jackson has never wavered in his total condemnation of Planned Parenthood and the deranged and evil practice of transgender procedures on minors. Jackson has spent his entire adult life fighting for, and seeking to protect, our nation’s youth. And Jackson will continue that fight as governor. Jones and his Campaign invented both accusations from whole cloth and broadcast them to the world on his official campaign account.

22. Think about what that tells you. Jones had every structural advantage in this race – the endorsement, the money, the establishment, a year-head-start. And when a businessman from outside the political machine showed up and started winning on the merits, Jones did not respond by making a stronger case for himself. Jones did not lay out a vision for Georgia. Jones did not give a single Georgia Republican voter one reason to vote *for* Burt Jones.

23. Jones made up lies about his opponent. Pathetic.

24. Jones and his Campaign know that if voters hear the truth, Jones loses. The polls prove it. The prediction markets prove it. Thirty days of unbroken momentum prove it. And Jones’s

own conduct – *e.g.*, the unconstitutional war chest, and now this lie – proves that Jones knows it too.

25. The smear is the concession. The lie told the truth about Burt Jones. And by publishing what he published on March 5, Jones told Georgia Republican voters everything they need to know about what kind of man Jones is and what kind of governor he would be: a man who exploits the system to gain unfair advantages when he can and lies when he is caught.

26. That is not what Georgia Republicans want. That is not what President Trump stands for. And that is not what this Court should allow to stand unremedied.

The Court Must Compel Burt Jones to Start Fighting Like an Honest Man, Not a Mediocre Loser

*“Great spirits have always encountered violent opposition from mediocre minds.”
-Albert Einstein*

27. Burt Jones’s life is one of privilege. Everything has been handed to him – his wealth, his political machine, his Republican nomination as governor (or, so he thought). Once that privilege was challenged, Jones’s reaction was not to work harder and make the case; no, Jones took the path of a spoiled child: lash out and lie.

28. Enough is enough. It is time for Burt Jones to start playing by the same rules as everyone else – no more special treatment. This lawsuit asks this Court to hold Burt Jones accountable for his words, his lies, and the malicious damage he has inflicted on a good man’s reputation. The law requires it. The facts demand it. And Rick Jackson – the foster child from Techwood Homes who built a \$3 billion company from nothing and is winning a Republican primary on nothing but the truth – has earned it.

II.
JURISDICTION AND VENUE

29. This Court has subject matter jurisdiction over this action pursuant to O.C.G.A. § 15-6-8, which vests Georgia's Superior Courts with general jurisdiction over all civil matters, including claims sounding in defamation and tort.

30. This Court has personal jurisdiction over Defendant Jones, a resident and domiciliary of the State of Georgia and a duly elected constitutional officer of the State of Georgia serving as its Lieutenant Governor.

31. This Court has personal jurisdiction over Defendant Burt Jones for Georgia, Inc., a campaign committee organized and existing under the laws of the State of Georgia, with its principal place of business in Georgia.

32. Venue is proper in Fulton County pursuant to GA CONST Art. VI, § 2, ¶ 4, because one of the Defendants, Burt Jones for Georgia Inc., maintains its principal place of business and thus resides in Fulton County.

III.
THE PARTIES

33. Plaintiff Rick Jackson is an individual resident of the State of Georgia and the founder and Chief Executive Officer of Jackson Healthcare, LLC, one of the largest healthcare staffing companies in the United States. Jackson is a candidate for the Republican nomination for Governor of the State of Georgia.

34. Defendant William Burton Jones is an individual resident of the State of Georgia, and Jones may be served with process at his residence in Georgia or wherever he may be found.

35. Defendant Burt Jones for Georgia, Inc. is the registered principal campaign committee of Defendant Jones, organized and existing under the laws of the State of Georgia.

Jones and the Campaign are believed to operate and/or oversee the official *Burt Jones for Georgia* account on X (formerly Twitter), bearing the handle @BurtJonesforGA, through which the defamatory statement at issue in this action was published. The Campaign may be served with process through its registered agent Macy McFall, at 500 14th Street NW, Atlanta, GA 30318, in Fulton County, Georgia.

IV. THE FACTS

Rick Jackson: The Embodiment of the American Dream

36. Rick Jackson’s story is one Georgia should be proud of – because it is the story Georgians believe in and the dream this country was built on.

37. Jackson grew up in Techwood Homes, Atlanta’s most notorious public housing project, one of the most impoverished communities in the state. His mother struggled with alcoholism. There was no safety net, no family wealth, no inheritance, and no one to call. As a teenager, Jackson entered the Georgia foster care system – a system he would later spend years fighting to reform.

38. Jackson could not afford to finish college. Jackson started from nothing. And from nothing, Jackson built one of the most successful healthcare companies in the United States.

39. Today, Jackson Healthcare employs thousands of Georgians at good-paying jobs. Its annual revenues exceed \$3 billion. Jackson has been a tireless champion of foster care reform in Georgia and spearheaded (including funding) legislation providing free college tuition to Georgia foster youth – giving the next generation of children in the system the college education Jackson could not finish himself. Jackson used the wealth he built from nothing – not inherited –

to give back to young Georgians who simply need a hand up (*not* a handout), which is the very ethos of Georgia conservatives.

40. Jackson is a major donor to President Trump’s political causes, including having contributed \$1 million in support of the President. Jackson is, in the truest sense, the self-made conservative outsider that the MAGA movement was built to celebrate: a man who built everything he has with his own hands, owes nothing to (and, therefore, is not owned by) the political establishment, and spent his career creating opportunity for other Georgians rather than extracting it from them.

41. On February 3, 2026, Jackson entered the Republican primary for governor of Georgia, pledging \$50 million of his own money to the race. Jackson did not enter to collect a title or settle a score. Far from it. Jackson entered because he has spent his life fixing broken systems, and he believed, and still believes, that he can fix Georgia’s – a system that has been plagued by do-nothing, career politicians like Burt Jones for far too long.

Burt Jones: The Spoon-Fed Heir Who Expected Coronation

42. Burt Jones’s story is a different one.

43. Jones is heir to Jones Petroleum Company, a family business that provided the financial foundation his political career was built upon. Jones has been a career politician for over a decade – serving approximately ten years in the Georgia State Senate before becoming the lieutenant governor in 2022.

44. Jones announced his candidacy for governor on July 8, 2025. By August 20, 2025, prediction markets placed Jones’s probability of securing the Republican nomination at 75.5%. By December 2025, that figure had climbed higher still, and insiders were speculating openly that

Jones might clear the 50% threshold required to avoid a runoff. The race, by every conventional measure, appeared to be his.

45. But Jones lacked one critical component: a compelling reason for Georgia Republicans to vote for him over a better candidate. That vulnerability lay dormant until February 3, 2026 – the day Rick Jackson entered the race and Georgia Republicans were given a real choice. And they chose Rick Jackson. After Jackson entered the race, the contrast with Jones was stark, and Jones could no longer hide his mediocrity and “well, I’m next in line” mentality. The Republicans of Georgia want a vision, not a status quo promotion.

The Race Transforms: Jackson Surges, Jones Collapses

46. The political transformation that followed Jackson’s entry was immediate and sustained; for Jones, it was devastating.

47. Within forty-eight hours of Jackson’s February 3 announcement, prediction markets slashed Jones’s probability of winning the nomination from 65% to 47%, while assigning Jackson 20.4% odds from a standing start. The market did not wait for polls. Jones’s support was cratering.

48. The polls followed. The first post-entry survey, a Cygnal poll reported by the Atlanta Journal-Constitution on February 9, showed Jones clinging to a narrow lead at 22% -- with Jackson already at 16% having entered the race six days earlier. That same day, Co/Efficient released its own poll: Jackson 24%, Jones 16%. For the first time, a credible poll showed Jones losing to the newcomer. The Atlanta Journal-Constitution observed, with characteristic understatement, that “*it already feels like a new race.*”

49. It was more than a new race. It was a realignment. By February 11, the Washington Examiner reported that Jackson had taken a wide lead in Georgia governor polling despite Jones's institutional advantages. A Rasmussen survey conducted the same week showed Jackson at 22%, Raffensperger at 18%, and Jones at 16% -- Jones running third in his own primary. By February 13, prediction markets had Jackson ahead of Jones. By February 19, Quantus Insights showed Jackson leading among decided voters 32.6% to Jones's 16.9%. By February 25, Kalshi had Jackson at 56% -- Jones at 25%. By March 1, Jackson had reached 60% on Kalshi, while Jones had fallen to 26%.

50. And among voters who self-identify as Trump Republicans – the very base Jones previously claimed as his electoral foundation – Jackson led Jones 32% to 18%. Jones is losing the MAGA vote to the newcomer. By a margin of nearly two to one.

51. Georgia Republicans were not pushed toward Rick Jackson. They were not tricked into supporting him. They chose Rick Jackson – freely, enthusiastically, and in accelerating numbers – the moment they had the chance.

Jones's Unconstitutional War Chest

52. Throughout this period, Jones had been operating with a financial advantage unavailable to any other candidate in the race. At the center of that advantage was Georgia's 2021 "leadership committee" statute – O.C.G.A § 21-5-34.2 – which allowed the sitting Lieutenant Governor to raise and spend unlimited campaign contributions through a leadership committee, while all other candidates in the primary remained subject to Georgia's standard contribution limits of \$8,400 per donor for a primary and \$4,800 for a runoff.

53. The asymmetry was staggering. Jones used this structure to accumulate \$15.9 million in his WBJ Leadership Committee as of January 31, 2026 – nearly five times the \$3.3 million balance in his regular campaign committee. No other candidate in the race could legally do what Jones had done.

54. Jackson filed suit against Jones and his Campaign in the United States District Court for the Northern District of Georgia on February 10, 2026, challenging O.C.G.A § 21-5-34.2 as unconstitutional under the First and Fourteenth Amendments. Jackson’s complaint described what Jones had built as “a de facto second, super-duper campaign committee for Lieutenant Governor Jones that disadvantages Jackson.”

55. On February 20, 2026, U.S. District Judge Thomas W. Thrash, Jr. heard argument on Jackson’s motion for a temporary restraining order and granted it from the bench. On February 27, Judge Thrash issued his written order memorializing the ruling: Jones’s leadership committee was barred from raising or spending any money to benefit his 2026 gubernatorial campaign. Campaign advertisements purchased with leadership committee funds since February 10 were ordered to either be (1) cancelled, or (2) assumed by Jones’s official campaign committee.

56. The financial firewall and uneven playing field Jones had spent years building – the legal architecture Jones had exploited to accumulate an advantage no opponent could lawfully replicate – was dismantled by a federal judge in open court. Rick Jackson tore it down, for every Georgia Republican voter to see. Jones was desperate. And Jones decided to take desperate and disgraceful action.

The Morning of March 5 – and What Jones Saw

57. On the morning of March 5, 2026, WSAV published the results of the Emerson College/Nexstar Media survey of likely Georgia Republican primary voters. The poll showed Jones and Jackson neck-and-neck. Emerson’s executive director Spencer Kimball noted that Jackson’s entry “appears to have reshaped the race, drawing support from voters over 60 (35%) and independent affiliated primary voters (25%).”

58. WSAV’s headline – “*Rick Jackson Shakes Up GOP Primary for Governor, New Poll Shows*” – ran as one of the outlet’s top stories and circulated statewide within hours of publication.

59. Jones and his Campaign undoubtedly saw that headline and panicked. Jones undoubtedly watched the RealClearPolitics polling average settle at Jackson 23.3%, Jones 19%. Jones knew that:

- a. prediction markets had him at 27%, down from nearly 80% just months earlier, while Jackson sat at 57%;
- b. a preliminary injunction hearing in the campaign finance case was approaching, threatening the permanent loss of whatever residual advantage his leadership committee might still provide; and
- c. in a mere thirty days, a self-made businessman who had never held elected office had drawn even with – and was blowing past – a career politician who had been running for governor for over a year.

60. Jones knew all of that. And within hours of the WSAV story breaking, Jones acted intentionally and maliciously.

The Defamatory Statement

61. On March 5, 2026, Jones and his Campaign published the following statement to the official *Burt Jones for Georgia* account on X, tagging Plaintiff's campaign handle @RickJacksonGA:

“RickJacksonGA made his fortune recruiting for Planned Parenthood, helping doctors perform transgender procedures on minors, and pocketed over \$1 billion in state contracts on the backs of Georgia taxpayers.”

62. The statement was published by Jones, through the Campaign. It was published on the official campaign account of a sitting constitutional officer of the State of Georgia. It was directed specifically at Jackson by name and by tagged social media handle. It was published to an audience of thousands of followers (and accessible to millions), and it was shared, repeated, and amplified across social media platforms.

63. The statement contains three distinct accusations. Two are false. The other is deliberately misleading and malicious.

64. **The First Accusation – False.** The accusation that Jackson “made his fortune recruiting for Planned Parenthood” is patently and demonstrably false. Jackson has no professional relationship with Planned Parenthood. Jackson did not derive “his fortune recruiting for Planned Parenthood,” as Jones unbelievably and falsely stated. The accusation is a fabrication, invented by Jones and published without a factual basis of any kind.

65. **The Second Accusation – False.** The accusation that Jackson made his fortune “helping doctors perform transgender procedures on minors” is patently and demonstrably false. The accusation is a total fabrication. And it was published by Jones without a factual basis of any kind.

66. **The Third Accusation – Deliberately Misleading Plus False Accusation.** The statement that Jackson “pocketed over \$1 billion in state contracts on the backs of Georgia taxpayers” is a deliberate attempt to transform an intentionally misconstrued data point into a false smear campaign by stripping it of all context. Jackson’s companies have received approximately \$1 billion in contracts from Georgia state agencies since fiscal year 2020, including approximately \$710 million in COVID-era healthcare staffing contracts awarded by the Georgia Department of Community Health during a declared public health emergency, when the State of Georgia desperately needed healthcare workers and Jackson’s companies provided them. Those contracts were lawfully awarded and faithfully performed. Jackson’s companies delivered critical healthcare services to the State when the State needed them most. Jones knows all of this. The deliberate juxtaposition of a dollar figure with two fabricated and politically inflammatory accusations – in a single, syntactically unified statement – was designed to, and did, convey the false impression that Jackson obtained those contracts through the corrupt means Jones falsely attributed to him. That impression is false. Jones knew it was false. Jones published it anyway.

Jones Knew the Statement Was False: Actual Malice

67. Jones did not stumble into this lie. Jones published this statement with knowledge of its falsity. Jones cannot feign ignorance. This was an intentional, malicious, and slanderous attack.

68. **Jones and his Campaign Had Access to the Truth.** Jones is the sitting Lieutenant Governor of the State of Georgia. Jones has access to the full resources of state government, including public records reflecting the nature and recipients of state healthcare staffing contracts. Rick Jackson is one of the most prominent businessmen in Georgia – the founder of a \$3 billion

company, a major Republican donor, and a figure whose professional history is extensively documented in the public record. Jones had every means to verify the truth of his accusations before publishing them. Jones and his Campaign clearly made no effort to do so (or, more likely, absolutely knew the accusations were false but made them anyways because Jones will stoop to whatever low needed to try to win the election).

69. **The Timing Establishes Motive.** Jones and his Campaign published the defamatory statement on the same day the Emerson poll confirmed that Jackson had, at minimum, drawn even with Jones in the Republican primary. The preliminary injunction hearing in the campaign finance case – which threatens to permanently eliminate Jones’s unfair financial advantage – was imminent. Jones is watching his prediction market odds fall week by week. The statement was not published in the ordinary course of political commentary. It was published when the walls were closing in on Jones’s campaign. It was clear Jones had run out of legitimate ammunition when he resorted to the defamatory attack. The timing is not a coincidence. It is evidence of actual malice.

70. **The Content Establishes Knowledge.** The accusations Jones and his Campaign published – that Jackson “made his wealth recruiting for Planned Parenthood” and “helping doctors perform transgender procedures on minors” – are not matters of interpretation, emphasis, or political disagreement. They are specific, concrete, verifiable factual claims about Jackson’s professional conduct. Jones and his Campaign know the claims are **false**. The specificity and verifiability of the accusations, combined with Jones’s access to the truth and his obvious motive to lie, establish that Jones and his Campaign published with knowledge of falsity and malice.

The Damage to Jackson

71. The defamatory statement was published to over twenty thousand followers on Jones's official campaign account, publicly available to the world through X, and was amplified, at minimum, across social media platforms and, potentially, across news outlets, and political commentary channels throughout Georgia and beyond.

72. The statement was specifically and deliberately calibrated to destroy Jackson's standing with Georgia Republican primary voters – the precise audience Jackson needs to win the May 2026, primary. The accusations of supporting Planned Parenthood and transgender procedures on minors are among the most politically toxic allegations that can be leveled against a Republican candidate in a Georgia primary. Jones knew this. Jones chose these false accusations, among all the lies he could have told, because they were the ones most likely to do the most damage to the most people in the least amount of time.

73. The reputational harm to Jackson is ongoing and serious. Jackson is a candidate in an active primary election scheduled for May 2026, with a potential runoff in June 2026. Every day that Jones's lie circulates unaddressed is a day that Georgia Republican voters may be making decisions about their vote based on information Jones fabricated. Time is not an abstraction in this case. It is the measure of the harm.

74. In addition to the reputational and electoral harm, Jackson has suffered and continues to suffer damages to his personal reputation, his business reputation, his standing in the community, and his relationships with supporters and professional associates — all as the direct and proximate result of Jones's deliberate falsehoods.

V.
CAUSES OF ACTION

COUNT 1: DEFAMATION/LIBEL (AGAINST DEFENDANTS)

75. Plaintiff hereby incorporates all factual allegations set forth above and below, throughout this Complaint, as though fully stated in this section.

76. To establish a claim for defamation under Georgia law, a plaintiff must prove: (1) a false and defamatory statement of fact concerning the plaintiff; (2) an unprivileged publication to a third party; (3) fault by the defendant amounting to at least negligence; and (4) damages.

77. **False and Defamatory Statement of Fact.** The statement published by Defendants on March 5, 2026 – that Jackson “made his fortune recruiting for Planned Parenthood” and “helping doctors perform transgender procedures on minors” – constitutes a false statement of fact. The statement is framed in the declarative, not as opinion, not as hyperbole, not as political rhetoric, but as a statement of verifiable historical fact about how Jackson built his professional career and fortune. It is specific. It is concrete. It is capable of being proven true or false. It is **false**. And Jones and his Campaign **knew it was false** when it was published.

78. The statement is defamatory on its face. It attributes to Jackson professional conduct – association with Planned Parenthood in a Republican primary context and facilitation of transgender procedures on children – that would expose Jackson to hatred, contempt, and reputational destruction among the very voters Jackson is seeking to represent.

79. **Unprivileged Publication.** Defendants published the statement on the official *Burt Jones for Georgia X* account on March 5, 2026, to an audience of over twenty thousand followers and the world via the public nature of X. The publication was instantaneous, statewide, and viral. No applicable privilege attaches to deliberate fabrications published on a political campaign account for the purpose of destroying a political opponent’s reputation.

80. **Of and Concerning Plaintiff.** The statement tagged Jackson's campaign account, @RickJacksonGA, by name. There is no ambiguity as to the subject of the statement.

81. **Actual Malice.** Defendants published the statement with knowledge of its falsity or with reckless disregard for whether it was true or false. As discussed in more detail above, Jones and his Campaign published accusations he knew were with no factual support and no purpose other than political and reputational harm.

82. **Damages.** As a direct and proximate result of Defendants' defamatory publication, Jackson suffered damages, including but not limited to his personal reputation, professional reputation, business relationships, and electoral standing. Jackson is entitled to recover all compensatory damages proven at trial.

VI.
CONDITIONS PRECEDENT AND JURY DEMAND

83. All conditions precedent to maintaining this action have occurred and been satisfied or have been excused and/or waived.

84. Plaintiff demands a trial by jury on all issues so triable.

VII.
REQUESTED RELIEF

Based on the foregoing, Plaintiff Rick Jackson respectfully requests the following relief from the Court:

- a) Judgment against Burt Jones and his Campaign for all actual damages;
- b) Judgment against Burt Jones and his Campaign for punitive damages;
- c) Judgment against Burt Jones and his Campaign for pre- and post-judgment interest at the maximum rate permitted by law;

- d) Judgment against Burt Jones and his Campaign for costs of suit and reasonable and necessary attorney's fees (if recoverable under applicable law); and
- e) Such other and further relief to which Plaintiff is entitled.

Respectfully submitted,

/s/ Deborah A. Ausburn

DEBORAH A. AUSBURN (LOCAL COUNSEL)

Ga. Bar No. 028610

Chalmers, Adams, Backer & Wallen, LLC

2016 Bascomb Carmel Road

Woodstock, GA 30189

Direct: 404-850-5468

E-Mail: dausburn@chalmersadams.com

-and-

CHASE J. POTTER* (LEAD TRIAL COUNSEL)

Texas Bar No. 24088245

E-Mail: potter@imcplaw.com

JOSHUA J. IACUONE*

Texas Bar No. 24036818

E-Mail: josh@imcplaw.com

GREG MCALLISTER*

Texas State Bar No. 24071191

E-Mail: greg@imcplaw.com

JESSE A. OKIROR*

Texas Bar No. 24065843

E-Mail: jesse@imcplaw.com

ANNA OLIN RICHARDSON*

Texas Bar No. 24102947

E-Mail: anna@imcplaw.com

IACUONE MCALLISTER POTTER PLLC

Energy Square One

4925 Greenville Ave., Suite 1112

Dallas, Texas 75206

Telephone: (214) 432-1536

COUNSEL FOR PLAINTIFF RICK JACKSON

**pro hac vice application forthcoming*