

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA**

ROBERT JULIEN,

Plaintiff,

Case No. _____

vs.

CORTNEY JULIEN,

Defendant.

_____ /

COMPLAINT

Plaintiff, ROBERT JULIEN, sues Defendant, CORTNEY JULIEN, for defamation, and alleges:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff, Robert Julien, is a resident of Palm Beach County, Florida.
2. Defendant, Cortney Julien, is a resident of Palm Beach County, Florida.
3. This Court has subject matter jurisdiction over this action because it is an action for damages in excess of \$50,000.00, exclusive of interest, attorneys' fees, and costs.
4. This Court has personal jurisdiction over Defendant because Defendant is an individual who resides in, and is a citizen of, the State of Florida.
5. Venue is proper in Palm Beach County because Defendant resides in Palm Beach County and because the acts giving rise to Plaintiff's claims occurred in Palm Beach County.

FACTS

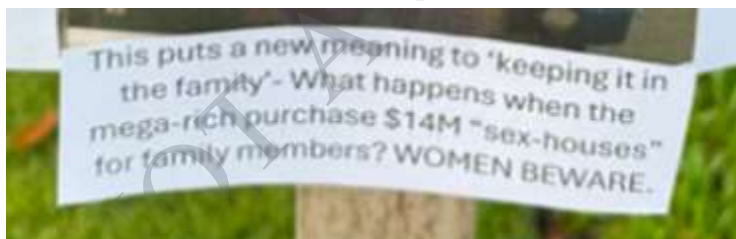
6. Defendant is married to Plaintiff's brother, and Defendant and Plaintiff's brother are presently engaged in dissolution-of-marriage proceedings.
7. In or around December 2025, Defendant obtained a compromising photograph of Plaintiff's brother.

8. In December 2025 and January 2026, Defendant distributed the photograph to members of Plaintiff's family.

9. During the same period, in or about December 2025, Defendant sent text messages making statements concerning Plaintiff and his brother that referred to the same incident depicted in the photograph.

10. On July 4, 2026, Defendant threatened to "make 1000 copies of your [expletive] flyer and send it out into the world. I will also post it on my social media for the world to see."

11. Days later, a flyer was posted in public view on a mailbox, where it could be seen by members of the public. The flyer reproduced the December 2025 photograph together with added text that makes false statements about Plaintiff. The text is included below:



12. The references to "sex-houses" and "keeping it in the family" also mirror a text message Defendant sent to Plaintiff on January 2, 2026, referring to a "sex pad" and "a family affair". Both the text message and the text added to the photo appear to refer to the same property.

13. Defendant then sent Plaintiff text messages that included a photograph of the flyer posted on the mailbox.

14. Defendant claimed that she did not know how the flyer came to be placed on the mailbox and stated that she would report it to the police.

15. Plaintiff encouraged Defendant to do so and requested a copy of any police report. Defendant responded: “[Expletive] off bobby. You can both kiss my [expletive]. Take that to your lawyers. 😁”

16. Upon information and belief, Defendant did not report the flyer to the police.

17. Upon information and belief, Defendant created the flyer, posted it, and photographed it. Defendant already had the photo months before it was posted and distributed it to Plaintiff’s family members; the language added to the posted photo is very similar to language Defendant used previously in relation to the same photo; and, just days before it was posted, Defendant threatened to “make 1000 copies” of it and distribute them.

18. The statements added to the flyer were published to third parties, including members of the public who were able to view the posted flyer.

19. The statements of, and concerning Plaintiff, are false.

COUNT I – DEFAMATION PER SE

20. Plaintiff realleges and incorporates paragraphs 1 through 19 above as if fully set forth herein.

21. Defendant published false statements of, and concerning Plaintiff, to third parties.

22. The statements on the flyer identify Plaintiff by name, identify his business by name, and harm the reputation of both by falsely claiming Plaintiff has used his company to purchase a property to be used for prostitution.

23. The statements are defamatory, per se, because, considered alone and without innuendo, they (1) falsely charge Plaintiff with the commission of a crime, (2) damage Plaintiff’s reputation and ability to conduct his business, (3) falsely charge Plaintiff with conduct

incompatible with the proper exercise of his lawful activities, and (4) tend to subject Plaintiff to hatred, distrust, ridicule, contempt, or disgrace.

24. Because the statements are defamatory, per se, both malice and damages are presumed as a matter of law, and Plaintiff is not required to plead or prove special damages.

25. Defendant published the statements to third parties, and each repetition and republication of the statements, including the posting of the flyer and any other instances of the flyer being posted, if there are more, constitutes a separate publication for which Defendant is liable.

26. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered injury to his reputation, business reputation, embarrassment, and mental anguish and emotional distress.

WHEREFORE, Plaintiff, Robert Julien, demands judgment against Defendant, Cortney Julien, for damages in an amount to be determined at trial, together with costs and interest, and all other relief that the Court deems just and proper.

Dated: July 15, 2026

Respectfully submitted:

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