

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

GRANT CARDONE,
an individual,

CASE NO.

Plaintiff,

v.

JOHN H. LEGERE,
an individual,

Defendant.

_____ /

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff GRANT CARDONE, by and through undersigned counsel, sues Defendant JOHN LEGERE, as follows:

NATURE OF DISPUTE

1. This case involves the outrageous, false and defamatory statements made by Defendant John Legere (“Legere”) wherein he attacked Plaintiff Grant Cardone’s (“Cardone”) businesses, character, reputation, and religious beliefs.

2. Legere, who is the former CEO of T-Mobile US, publicly and maliciously attacked, injured, and defamed Cardone through his false, misleading, and disparaging statements.

3. Through this action, Cardone seeks monetary damages for the substantial harm caused to him by Legere’s outrageous and unlawful conduct.

JURISDICTION AND VENUE

4. This Court has jurisdiction of this matter as the amount in controversy exceeds the sum or value of Fifty Thousand Dollars (\$50,000.00), exclusive of interest, costs, and attorney’s fees.

5. This Court possesses jurisdiction over Legere pursuant to Fla. Stat. §§ 48.193(1)(a).

6. Venue is proper in this Court as the cause of action accrued in Miami-Dade County, Florida.

PARTIES

7. Plaintiff GRANT CARDONE (“Cardone”) is an individual over the age of 18, is *sui juris*, and resides in Miami-Dade County, Florida.

8. Defendant JOHN LEGERE (“Legere”) is an individual over the age of 18, is *sui juris*, and resides in Naples, Florida.

9. Cardone has retained the undersigned law firm and has agreed to pay to them a reasonable fee for their services.

10. All conditions precedent to the filing of this action including, without limitation, providing Legere with notice pursuant to Florida Statute §770.01, have either occurred or been waived.

FACTUAL BACKGROUND

11. Cardone is an American businessman and entrepreneur, who is internationally renowned as a business strategist, and a marketing and branding expert.

12. Cardone is also a New York Times best-selling author of seven business books, including “If You’re Not First, You’re Last,” “10X Rule,” and “Sell or be Sold.”

13. As a highly acclaimed international speaker, Cardone regularly appears on national television and also maintains his own television network, “Grant Cardone TV.”

14. Cardone is the creator of customized sales training programs used by Fortune 500 businesses, companies, and individuals.

15. Cardone's 10X Growth Conference, which is the largest business conference in the United States, was created in 2017 to give people from all over the world an opportunity to learn sales and business strategies from the world's most successful entrepreneurs.

16. Cardone also serves as a private equity fund manager, whose company holds over \$4 billion in assets, and owns multiple successful companies which operate within the software, technology and real estate industries.

17. Legere is the former CEO of T-Mobile US.

18. Legere is very active on social media platforms across the internet, with over six million followers on X, TikTok, Instagram, and the social audio app application known as Clubhouse.

19. Legere is known for posting videos providing educational information and financial guidance, and regularly participates in live virtual exchanges on Clubhouse and X Spaces, while giving his view on topics ranging from business, education, diversity, and politics.

20. In or around 2015, Legere, while working as CEO of T-Mobile, became engaged with the Cardone Training Technology team.

21. Legere expressed interest in implementing aspects of Cardone U at T-Mobile.

22. Thereafter, Cardone joined a live Periscope Video Chat being held by Legere, which was available to the public.

23. As Cardone came into the virtual room, Legere made note of Cardone's presence and made it a point to compliment Cardone for his astute business practices and positive influence on people.

24. Legere and Cardone shared a positive and productive relationship as the two of them would proceed to work together to raise money for charity, philanthropic purposes and

special causes via the Clubhouse platform. *See, e.g.* <https://www.prweb.com/releases/grant-cardone-turns-clubhouse-app-into-philanthropic-book-launch-802894784.html>.

25. In addition, Legere and Cardone had many productive debates on various social media platforms discussing various matters such as business, real estate, politics, current affairs, and politics.

26. Both Legere and Cardone were held in high regard by the audience members, as demonstrated by the number of questions posed to them as well as the vast number of listeners who would attend these debates and discussions.

27. One of the more appealing aspects of the discussions related to the differing backgrounds of Legere and Cardone.

28. Legere, armed with an Ivy League education, Wall Street experience and structured corporate background matching up against Cardone, a rags-to-riches success story who built a massive financial empire through hustle and hard work, lent itself to spirited and healthy exchanges that the audience could not resist.

29. On several occasions, audience members and hosts would highlight the value of having access to business legends, such as Cardone and Legere, on the same stage.

30. In early 2020, the relationship had grown close enough to the extent that Legere also reached out to Cardone asking for personal advice and guidance on health matters and specifically inquired about Cardone's 10X Health System.

31. Cardone arranged for 10X Health to provide Legere with VIP services, which Legere would later recommend to audiences in live chatrooms.

32. Thereafter, Legere abruptly pivoted away from his collaborative relationship with Cardone, and instead became hostile toward Cardone in live audio chat rooms when the audience

avored Cardone's opinion on certain topics, such as education, economic disparity, the COVID-19 vaccine, politics, education and/or finance.

33. Legere often became extremely defensive, erratic, and combative, seeking to harshly dismiss Cardone's views, even resorting to inappropriate personal attacks directed at Cardone's background, religion, height, business, practices, live events, and reputation.

34. On certain occasions, when he was attacking Cardone, Legere was accused by audience members of allegedly being drunk, slurring his words and appearing jealous and envious of Cardone's self-made status.

35. Cardone privately reached out to Legere and advised him that he was offended by the personal attacks and demanded that Legere cease engaging in such personal attacks.

36. Legere agreed that he had gone too far and said he would stop.

37. Cardone also sent a text message to Legere stating, "I will discontinue my friendly relationship with you if you continue to attempt to smear my religion, marriage, business and reputation."

38. Despite Legere's assurances that he would not personally attack Cardone, Legere's comments not only continued but became even more hostile and were made with the intention of attacking Cardone's reputation, religion, and businesses.

39. Initially, Cardone attempted to avoid Legere, but Legere became intent in seeking out Cardone in chat rooms in order to berate him.

40. By way of example, in 2021, while Cardone was marketing his 2021 10X Growth Conference, Legere went on an unprovoked rant and called Cardone "a bull shit artist and sales and marketing guy who is always selling something."

41. More recently, Legere has commenced a campaign designed to defame Cardone,

by making claims that lack veracity and have caused and will continue to cause damage to Cardone's reputation in the public community.

42. Specifically, in or around June 2023, Legere participated in a live, public chat room in front of thousands of listeners wherein Legere disparaged and attacked Cardone's business, reputation, and religious beliefs (the "Exchange").

43. Legere was aware that the discussion was being recorded and was aware or should have been aware of the potential future damage that could result if others reposted the defamatory statements being made by Legere on other social media platforms.

44. Indeed, this Exchange has since been re-posted on various social media platforms, including YouTube, thereby accumulating millions of viewers, which is growing every day.¹

45. A few examples of the defamatory statement(s) made by Legere during the Exchange are, as follows:

- **Legere** – "Grant, *you are the biggest bullshit artist on the planet*, Okay? So I'll finish my statement.
- So, *Grant Cardone, who talks about being a recovering addict, and if you look at his posts, they're constantly him holding wine and whiskey and everything else. So, Grant, are you a recovering addict or are you just a drunk?*
- **Cardone** – "I had a drug problem. I never had a drinking problem."
- **Legere** – "Hey, hey, Grant. How, how much the world sees a bifurcation between a drug issue and an alcohol issue?"
- **Cardone** – "What, what do you know about addiction?"
- **Legere** – "I know quite a bit."
- **Cardone** – "I've never had a problem with alcohol."

¹ The Exchange can be accessed by using the following YouTube link:
<https://www.youtube.com/live/L6qWUtTHhU8?app=desktop>

- **Cardone** – “Why are you trying to diminish everybody in the room?”
- **Legere** – “No, just you Grant, *because you're a f*****g con-man, I'll say this on this room right now. I believe that in the next year, Grant Cardone will be found guilty of fraud. I believe that Grant Cardone will be found guilty of fraud. And I want nothing to do with it.*”
- **Cardone** – “John, do you know of anybody that I have been fraudulent to?”
- **Legere** – “*I think you are. I think you are a fake, uh, you know, somebody that says, I used to be an addict and I think you are fake. That's my opinion.*”
- **Cardone** – “But, but thank you. But you've never done business with me. You've never given anything.”
- **Legere** – “And I wouldn't do business with you. Grant. *You've been begging me to do business with you for five years, and I won't.*”
- **Cardone** – “Uh, uh, I don't think I've ever offered you any money to do anything or any partnership.”
- **Legere** – “*By the way, he's not a billionaire. He doesn't have close to a billion.* And he is, somebody, somebody here, he, he somebody who is self-promoting. *And if you go to the world, go to the world of CNBC, go to CNN, go to the world, ask about Grant Cardone. He doesn't exist.*”
- **Cardone** – “How do you, how do you know what I'm worth? John?”
- **Legere** – “How do I know what you're spending under the radar to live your lifestyle?”
- **Cardone** – “How do you know where my money comes from? How do you? You don't know anything about me financially. Just admit that, John.”
- **Legere** – “So how much you paying to the church Grant <laugh> John?”
- **Cardone** – “What, what, what, John, what does that matter? How much?”
- **Legere** – “You paying to the church?”

- **Cardone** – “John, what do you know about me financially? You just said you just made a bunch of claims about, I, I’m”
- **Legere** – “You. What I know Grant, is that you say all the time you're a billionaire, that you have 4 billion. So, you know, in, in real estate, do you, are you a billionaire?”
- **Cardone** – “John, what do you know about my Financial...?”
- **Legere** – “*Here's your chance. Here's your chance. Grant, are you a billionaire?*”
- **Cardone** – “I don't need a Chance with you. You're the one that,”
- **Legere** – “*Are you a billionaire? Tell the group, Hey, hey, Grant, your profile says you're a billionaire. Are you a billionaire?*”
- **Cardone** – “John, I'm not gonna even answer your questions right now.”
- **Legere** – “Are You? Are you close?”
- **Legere** – “*Let the group know that a very simple statement is Grant Cardone a billionaire. Yes or no? He won't answer.*”
- **Cardone** – “Well, it'd be hard for me to state that. I don't know how I could state that publicly and it not be true without having banks come back and say, bro, what are you doing?”
- **Legere** – “*So, you know what the answer is? Grant, you're not. Assets versus Debt with a market at 7% mortgage rates. How you doing?*”
- **Cardone** – “John? I'm doing great. How, how do you know?”
- **Legere** – “You Say it all the time. You're a billionaire. *You say it all the time, but you're not, and you won't Say it.*”
- **Cardone** – “How do you know that John?”
- **Legere** – “Yes or no? Grant Cardone are you a billionaire.”
- **Cardone** – “John, how do you know <crosstalk>?”

- **Legere** – “There you go on. That says at all. Its means Grant. <crosstalk> You're a big talker. You're a big talker.”
- **Legere** – “So let everybody know the answer was not Yes.”
- **Cardone** – “John, did you, did you say in this room that, that I am fraud, uh, fraudulently using funds.”
- **Legere** – “Oh, Here you go”
- **Legere** – “Oh, God, Blah, blah, blah. Here we go. Grant . How stupid do you think I'm”
- **Cardone** – “I think you said that, John. Did you mean that?”
- **Legere** – “Say What? Grant, what did I say? Grant, do you wanna ask a lawyer to ask the question more specifically?”
- **Cardone** – “I'm asking you.”
- **Legere** – “Just him write it down. Have him write it down and send it to me.”
- **Cardone** – “Do you believe that I have been fraudulent with my investors?”
- **Legere** – “You know what? Grant, I believe you're”
- **Cardone** – “No, you don't Believe that. You don't believe that.”
- **Legere** - “*I Believe, I believe you are a con man of the highest order*”
- **Cardone** – “And you understand my business depends on my reputation and on pertaining to the public.”
- **Legere** – “Hey, okay. *This is conman number 1 0 1 <laugh>. Try to find a little legal issue. Grant, I believe you're a conman. That's my personal belief. Hey, Grant, Are you gonna sick? The are you gonna sick the church? You gonna the church on me now? Because I know the church has a big issue with people that are anti, you know, big players like you. Hey, and are you not the biggest contributor to the church?* Or no? Is, or is, is, is, uh,”
- **Cardone** – “why, why do you attack?”

- **Legere** – “Is, is the top gun guy still ahead of you?”
- **Cardone** – “Why do you attack people's religion? Man, I, I don't Understand.”
- **Legere** – “*It's not religion. You know, it's part of your, it's the, the whole spiel. I do understand that the church will attack those that attack you. Is this part of that?*”
- **Cardone** – “John? Man, bro, you, you, you gotta get some help, pal. I'm surprised that you would tell hundreds of people in a public room that I steal investors' money when in fact, we delivered \$22 million in cash this year and almost \$400 million over the last four years.”
- **Legere** – “*And my opinion is you're a fraud.*”
- **Cardone** – “Yeah. And, and what about the fraud? What about the, the, the, I stole money from, uh, investors.”
- **Legere** – “My opinion is, *Grant is you're a fucking fraud.* Go ahead.”
- **Cardone** – “Can I”
- **Legere** – “*Tell the church, tell the church to come get me, Grant. I tell I, and, and Grant, how do you think that's gonna play in your big opinion about yourself and what people think about you if you're gonna go and have this conversation? He said, I'm, I'm a fraud. So if you're that, if that you're that tenuous, you're a fraud Grant.*”
- **Cardone** – “Okay. Thank you, man.”
- **Legere** – “*Can't wait to see you leave now. Go ahead. Take your tail between your legs and head out the door.*”

See Exchange, <https://www.youtube.com/live/L6qWUtTHhU8?app=desktop> (emphasis added).

46. In addition to the above-referenced defamatory remarks made by Legere during the Exchange, Legere has engaged in further instances of making false and defamatory statements about Cardone.

47. Some of these defamatory statements were published by Legere on the social media platform X (formerly, Twitter), which were shared with Legere’s substantial following of 5.6 million users:

- **February 2, 2023** – Cardone posted a link for an upcoming interview with Lara Trump at 8:00pm EST stating that Cardone would be discussing ideas on running a successful business, the reasons behind his decision to move to Florida, his experiences of winning at casinos, and more. Legere responded at 8:16pm EST (16 minutes after the livestream began) by posting the following: “Wow how does it keep being live???” and disparaging Cardone and his interview without a basis to do so.
- **February 8, 2023** – Cardone posted a GCTV article detailing how #10XRich became #1 trending on Twitter to which Legere responded by publishing a post stating: “Hmmm by tossing \$ at it?” and implying to the public that Cardone achieved the trending status through financial means rather than genuine engagement or organic traction.
- **February 22, 2023** – Cardone posted “Who’s your President?” on his page inviting follower engagement to which Legere responded on February 23, 2023 by publishing a post stating: “Who is yours Grant? And are you asking the people to take action here? Oh never mind that was Jan 6th...Back to first question. Who is your President Grant? Mine and that of all American citizens is Joe Biden.” Legere was suggesting/deceiving the public by implying a connection between Cardone and the events that occurred on January 6, 2021, and insinuating involvement where there was none while also misrepresenting Cardone's intent as a call to take disruptive actions.
- **February 23, 2023** – Cardone posted a GCTV article detailing how he saved his health at age 64 to which Legere responded by posting: “Steroids?[,]” falsely implying to the public that Cardone saved his health by employing the use of illegal supplements, thereby attacking Cardone’s reputation without basis.

48. To exacerbate an already caustic situation, Cardone has become aware of additional posts that were made by Legere—which have since been deleted and/or archived from

his X profile.² These defamatory publications include, *inter alia*, the following:

- **March 6, 2023** – “@GrantCardone This is like crazy people talking about crazy investment.”

Despite the absence of context from the original post, Legere’s response disparages Cardone’s investment strategies or opinions, using the term “crazy” in a context that implies incompetence, irrationality, or unreliability in Cardone’s approach.

- **March 15, 2023** – “@GrantCardone Of course after all the fear mongering the sky is falling and Grant is here to help...are people really...<https://t.co/IM5XZJdBwk>[.]”

Despite the absence of context from the original post and the link/image depicted Legere’s post, Legere’s response suggests that Cardone is taking advantage of a situation involving fear mongering or a crisis, implying that Cardone’s actions might not be genuine or that he is capitalizing on fear for personal gain, thereby publicly attacking Cardone’s reputation with baseless insinuations.

- **March 15, 2023** – “@Shaun_Schneider @GrantCardone So quick run out of the building and go to Grants seminar and invest in real estate,... <https://t.co/kDcH2U7xcm>[.]”

Despite the absence of context from the original post and the link/image depicted in Legere’s post, Legere’s response mocks Cardone’s business strategies and belittles future investors by implying a lack of seriousness or legitimacy in the investment opportunities presented by Cardone without a justifiable basis for doing so.

- **March 28, 2023** – “@GrantCardone You mean like a scientologist homophobe transphobe or is there more (besides arrogant egotist 😊).”

² The fact that Legere’s posts were deleted suggests that he was conscious of having published a false, defamatory, and/or misleading statement. This act of removal implies an acknowledgment of the problematic nature of the content and potentially an attempt to mitigate the repercussions of the defamatory statements.



John Legere @JohnLegere

@GrantCardone You mean like a scientologist
homophobe transphobe or is there more (besides
arrogant egotist 🤔) — PointTweet.org

Posted March 28, 2023

Despite the absence of context from the original post, Legere's response targets Cardone's personal beliefs and character, thereby damaging Cardone's reputation without a justifiable basis.

49. To add insult to injury, in an effort to diminish the trust of the public and further damage Cardone's reputation, Legere has repeatedly challenged articles discussing Cardone's net worth online.

50. As the former CEO of a multi-billion-dollar company, Legere understands the importance of a reputable brand, public relations, and public trust.

51. Legere was more than aware that his unfounded attacks on Cardone would cause damage to Cardone and his businesses by placing doubt in the minds of potential customers and the public.

52. The statements made by Legere in the social media posts and during the Exchange are false and defamatory.

53. Each of the statements made by Legere are actionable and give rise to the right to damages.

54. The statements made by Legere impute to Cardone conduct, characteristics or a condition incompatible with the proper exercise of his lawful business, trade, profession or office.

55. The statements made by Legere have subjected Cardone to hatred, distrust, ridicule, contempt, and/or disgrace.

56. Such false and defamatory statements have caused harm to Cardone and his brand in an amount believed to be no less than \$100,000,000.00.

CAUSES OF ACTION

Count I – Defamation Per Se

57. Cardone incorporates by reference the allegations set forth in paragraphs 1 through 56, *supra*, as if fully set forth herein.

58. The unprivileged statements made by Legere to others about Cardone are false and defamatory.

59. At the time such statements were made by Legere, Legere knew or should have known that they were false and defamatory.

60. Legere published such statements negligently, with knowledge of the falsity of the statements, and/or with reckless disregard of their truth or falsity.

61. The statements were not privileged.

62. The statements were published by Legere with actual malice, oppression and fraud in that he was aware at the time of the falsity of the publication and thus, made said publications in bad faith, out of hatred and ill-will directed towards Cardone without any regard for the truth.

63. Moreover, the statements tend to so harm the reputation of Cardone as to lower his professional reputation in the community or deter third persons from associating or dealing with him and, as such, constitute defamation *per se*.

64. As a proximate result of the maliciously false and defamatory publication of statements to third parties by Legere, Cardone has been damaged.

65. Because Legere's defamatory statements were made with actual malice towards Cardone, Cardone reserves the right to amend in order to assert a claim for punitive damages.

WHEREFORE, Plaintiff GRANT CARDONE demands judgment against Defendant JOHN H. LEGERE a/k/a JACK LEGERE for damages, court costs, and such other relief as the Court deems just and proper.

Count II – Defamation Per Quod and/or Defamation By Implication

66. Cardone incorporates by reference the allegations set forth in paragraphs 1 through 56 supra, as if fully set forth herein.

67. The unprivileged statements made by Legere to others about Cardone are false and defamatory.

68. At the time such statements were made by Legere, Legere knew or should have known that they were false and defamatory.

69. Legere published such statements negligently, with knowledge of the falsity of the statements, and/or with reckless disregard of their truth or falsity.

70. The statements were not privileged.

71. The statements were published by Legere with actual malice, oppression and fraud in that he was aware at the time of the falsity of the publication and thus, made said publications in bad faith, out of hatred and ill-will directed towards Cardone without any regard for the truth.

72. Moreover, the statements tend to so harm the reputation of Cardone as to lower his professional reputation in the community or deter third persons from associating or dealing with him.

73. As a proximate result of the false and defamatory publication of statements to third parties by Legere, Cardone has been damaged.

74. Because Legere's defamatory statements were made with actual malice towards Cardone, Cardone reserves the right to amend in order to assert a claim for punitive damages.

WHEREFORE, Plaintiff GRANT CARDONE demands judgment against Defendant JOHN H. LEGERE a/k/a JACK LEGERE for damages, court costs, and such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff, Grant Cardone, demands a trial by jury.

Date: January 11, 2024

Respectfully submitted,

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