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Attorney for Plaintiff
Denison Powerlifting Inc.,
dba United States Powerlifting Association

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

DENISON POWERLIFTING INC.,
dba UNITED STATES
POWERLIFTING ASSOCIATION,

Plaintiff,

vs.

JOHN DORSEY, an individual and
JOE SULLIVAN, an individual;
DOES 1 through 10, inclusive,

Defendant.

CASE NO. 8:23-CV-00744

COMPLAINT FOR:

- 1. DEFAMATION**
- 2. INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONS**
- 3. PROMISSORY FRAUD**
- 4. CONSPIRACY**

1 Plaintiff DENISON POWERLIFTING INC., dba UNITED STATES
2 POWERLIFTING ASSOCIATION (“USPA” or “Plaintiff”), by and through its
3 attorney, hereby brings this action against JOHN DORSEY (“Dorsey”) and JOE
4 SULLIVAN (“Sullivan”) (collectively “Defendants”), and alleges as follows:

5 **INTRODUCTION**

6 1. This case is about the incredible damage a self-proclaimed social
7 media influencer motivated by “likes” and increasing their number of “followers”
8 can wrought on everyday people and businesses by maliciously spreading
9 falsehoods.

10 2. Defendant John Dorsey (“Dorsey”) is a self-proclaimed “social media
11 influencer” and “journalist,” and he prides himself on being social media
12 influencers’ “least favorite influencer.” Dorsey posts videos on his Instagram
13 account, @goob_u2, accusing models and weightlifters of various bad acts,
14 including, most often, photoshopping their photos. As of the date of this filing, his
15 account has roughly 122,000 followers.

16 3. On January 14, 2023, Dorsey found a new target: USPA. His express
17 and singular goal is to “take down” USPA.

18 4. Plaintiff USPA is a powerlifting association that contracts with
19 referees and meet directors to host meets where USPA members compete in
20 different powerlifting exercises (e.g., squat, bench press, deadlift, etc.). Up until
21 January 2023, USPA’s business was thriving.

22 5. Beginning on January 14, 2023, Dorsey posted a series of defamatory
23 videos falsely claiming that USPA’s leadership engaged in a conspiracy to cover
24 up bad acts its contractors and employees allegedly committed.

25 6. Defendant Joe Sullivan (“Sullivan”) seized upon the public outcry
26 Dorsey’s posts created to drive USPA’s sponsors, members, and meet directors to
27 a competing weightlifting federation that Sullivan is affiliated with. Shortly after
28

1 Dorsey’s first video, Sullivan allied himself with Dorsey. He repeated Dorsey’s
2 misrepresentations and attacked anyone who disputed them.

3 7. Sullivan and Dorsey, who are close friends, engaged in a coordinated
4 effort to destroy USPA. They publicly targeted sponsors, members, and meet
5 directors, and threatened that they must end their affiliation with USPA or face the
6 wrath of their social media mob.

7 8. As a result, USPA projects it will lose over \$600,000 in the coming
8 year.

9 9. As a graduate of University of Pittsburg School of Law, Dorsey
10 should know better. He and Sullivan must be held accountable.

11 **THE PARTIES**

12 10. Plaintiff USPA is a corporation organized under the laws of
13 California, with its principal place of business in Irvine, California.

14 11. Upon information and belief, Defendant Dorsey is an individual
15 domiciled in the state of Connecticut.

16 12. Upon information and belief, Defendant Sullivan is an individual
17 domiciled in the state of Nevada.

18 13. Defendants Does 1-10 are persons or entities whose identities or
19 relationships to this action are presently unknown. Plaintiff will seek leave of
20 Court to amend this Complaint by substituting the true names and relationships of
21 any Doe defendants when they become known. Each of the fictitiously-named
22 respondents acted individually or in concert with the named Defendants and are
23 responsible for the occurrences alleged in this Complaint.

24 **JURISDICTION AND VENUE**

25 14. This Court has subject matter jurisdiction over this matter pursuant to
26 28 U.S.C. § 1332, as the matter in controversy exceeds the sum or value of
27 \$75,000, exclusive of interest and costs, and there is complete diversity of
28 citizenship between Plaintiff and Defendants.

1 18. USPA is one of the largest powerlifting federations in the country. It
2 hosts meets in all fifty states.

3 19. However, California is its home base. It is incorporated in California,
4 and USPA's National Office is in California. Denison and Tronske are both
5 California residents, and they conduct the affairs of USPA from California.

6 20. USPA's website, including its "Contact Us" page, shows that USPA is
7 based in California.

8 21. California has, by far, more USPA members than any other state.

9 22. Like other powerlifting federations, USPA requires people to register
10 as members before they can compete in its meets. This is the primary source of
11 USPA's revenue. Each lifter must pay an annual membership fee to participate in
12 USPA's meets.

13 **1. Meet Directors**

14 23. Meet Directors host the meets, and as such, they are the lifeblood of
15 USPA. If Meet Directors did not put on competitions, people would have no
16 reason to join USPA.

17 24. Meet Directors are incredibly valuable because a given area may have
18 hundreds of powerlifters wanting to compete but only one Meet Director with the
19 connections and know-how to host competitions. If that Meet Director chooses to
20 leave USPA and join another federation, the USPA members will likely do the
21 same in order to keep competing.

22 25. Meet Directors are independent contractors, and each signs a Meet
23 Director Agreement. A true and correct copy of a standard Meet Director
24 Agreement is attached hereto as Exhibit A.

25 26. Exhibit A is a Meet Director Agreement with Leonetta Richardson, a
26 California Meet Director who left the USPA due to Defendants' defamatory
27 conduct.

28

1 27. Meet Directors do not pay USPA or vice versa. Meet Directors earn
2 money by charging entrance fees for the USPA competitions they hold.

3 28. Meet Directors work with a network of other USPA unpaid,
4 independent contractors to host and officiate competitions, including Referees,
5 Staff Officials, State Chairs, and Records Chairs.

6 **2. USPA Instituted Background Checks In September 2020**

7 29. In September of 2020, USPA made changes to its application process
8 for new officials, which included new Meet Directors, new State Chairs, and new
9 Referees.

10 30. First, USPA began asking applicants to state their criminal record.

11 31. Second, USPA began running background checks on the National Sex
12 Offender Registry to ensure applicants were not on the Registry.

13 32. From September 2020 through January 28, 2023 (when USPA
14 overhauled its background check process), zero applicants appeared on the
15 Registry.

16 **3. USPA Has HR For Its National Office**

17 33. USPA also retains a staff of full and part-time employees to work at
18 its National Office. USPA's Executive Committee, which includes Denison and
19 Tronske and has included other members previously, is responsible for rule
20 changes, selecting State Chairs, and disciplinary actions.

21 34. During the relevant time period, USPA has contracted with a third-
22 party human resources company ("HR") to advise on personnel issues with its
23 National Office employees.

24 35. USPA's HR provider did not serve the Meet Directors or any other
25 independent contractors. It only worked with USPA's employees.

26 36. Through mid-January 2023, the Executive Committee operated as a de
27 facto HR for USPA Meet Directors.

28

1 **B. Dorsey**

2 37. Dorsey is a self-proclaimed social media influencer and self-anointed
3 “journalist” who operates under the Instagram handle @goob_u2. He describes
4 himself as “Your favorite influencers [sic] least favorite influencer.” Under the
5 guise of “exposing fitness frauds,” Dorsey uses his social media account to
6 humiliate social media influencers, expressing disingenuous outrage at the
7 unremarkable reality that Instagram models sometimes use Photoshop.

8 38. Dorsey falsely portrays himself as trying to help young people who
9 believe they have to meet unrealistic standards of beauty. The reality is that
10 Dorsey uses the power of social media to humiliate young people in an effort to
11 gain more followers and promote himself.

12 39. On February 24, 2023, Dorsey posted a video shaming Instagram
13 model Gracie Bon (@graciebon) for allegedly editing her photos to make it appear
14 that she lost more weight than she did. In the video, he displays a photo of Bon in
15 a bikini, zooming in on her hips to point out supposed evidence of her
16 photoshopping.

17 40. On February 3, 2023, Dorsey posted a video about twenty year old
18 college student and gymnast, Olivia Dunne (@livvydunne). In the video, Dorsey
19 repeatedly accuses Dunne of editing her photos, while he zooms in on her waist
20 and rearend in photos where she is wearing revealing outfits. He displays one
21 photo of her in a bikini, pointing to an allegedly “bent” chair in the background as
22 evidence that Dunne “squeeze[d] her waist in” and remarking that the chair is “not
23 supposed to bend like that, Olivia.”

24 41. Dorsey has hundreds of posts like these. As of the day of this filing,
25 Dorsey has 999 posts. The overwhelming majority of his posts are these attack
26 videos.

1 42. Dorsey’s vitriol is especially pointed when someone has the gall to
2 question him. He frequently brags that he graduated from the University of
3 Pittsburgh School of Law and threatens his detractors with defamation lawsuits.

4 43. Dorsey amassed a sizeable following through his video takedowns.
5 Before he began posting about USPA, Dorsey had 49.3k followers.

6 **C. Sullivan**

7 44. Joe Sullivan is a powerlifter with a large social media following
8 within the powerlifting community. His Instagram account (@joesullivan_aod)
9 has roughly 95,600 followers as of the date of this filing.

10 45. Sullivan and Dorsey are close friends.

11 **D. Overview of Defamatory Instagram Posts**

12 46. Since January 14, 2023, Dorsey has published 19 Instagram Posts and
13 Reels and hundreds of Instagram Stories about USPA (hereinafter, “posts”).

14 47. The majority of his posts follow a similar template. The video opens
15 with Dorsey on his couch, generally shirtless. He identifies one or two people
16 associated with USPA, displays a picture of them, and then alleges they committed
17 a crime or horrible act. He often displays a screenshot of a document next to his
18 face purporting to substantiate his allegations.

19 48. Then, Dorsey turns his attention to the USPA and falsely alleges that
20 the USPA covered up the individual’s conduct or otherwise permitted the conduct
21 to occur.¹

22 49. The individuals Dorsey targeted include Stephanie Bennett, Mindy
23 Layne, James Justice, Chico Cloyne, and Aaron Skogsberg (the “Individuals”).

24 50. Joe Sullivan worked with Dorsey to amplify Dorsey’s posts and stir
25 up a frenzy in the powerlifting world.

26
27
28 ¹ This Complaint asserts Dorsey’s comments about USPA were defamatory. Dorsey’s allegations that the individuals committed bad acts are not the subject of this lawsuit.

1 51. Sullivan fed Dorsey information, broadcasted Dorsey’s posts to his
2 nearly 100,000 followers, and repeated Dorsey’s false statements.

3 52. Defendants gathered information from California sources in preparing
4 their defamatory remarks. For example, Dorsey exchanged private Instagram
5 messages with USPA’s official Instagram account (@USPAPower), USPA’s
6 California branch (@USPACalifornia), and USPA’s California President
7 (@USPASteve Denison).

8 53. Additionally, Sullivan recorded a call between himself and Tronske,
9 who was in California at the time, and then shared that recording with Dorsey,
10 despite promising Tronske that he would keep the recording private. Dorsey then
11 used a clip of this recording in one of his videos.

12 54. Dorsey also posted a recording of a statement Denison made from his
13 California home office during a virtual meeting with Meet Directors on January 23,
14 2023.

15 55. On March 2, 2023, USPA’s California counsel sent cease & desist
16 letters to Dorsey and Sullivan, instructing them to stop publishing defamatory
17 statements about USPA and to remove specific defamatory statements from
18 Instagram. True and correct copies of the letters are attached hereto as Exhibits B
19 and C.

20 56. Hours later, Dorsey posted pictures of the cease & desist letter he
21 received and stated, “please don’t just cease and desist me. If you mean it, just sue
22 me. I’ll wait for discovery - you can’t sue people for posting their opinions of your
23 poor actions.”

24 57. Since March 2, 2023, Dorsey and Sullivan have continued to publish
25 damaging comments about USPA. Neither has removed any of the Instagram
26 posts or comments identified in the cease & desist letters.

27 58. Defendants used the false claims and the scandal they manufactured to
28 explode in popularity. Since Dorsey started posting about USPA, his follower

1 count has increased by almost 150% (and counting). When this started, Dorsey
2 had about 49.3k followers, and now he has approximately 122K followers.

3 59. Sullivan has likewise seen a marked increase in his followers.

4 **II. DEFENDANTS ENGAGE IN SCHEME TO DEFAME USPA**

5 **A. Dorsey Falsely Asserts That USPA Buries Allegations of Sexual** 6 **Assault By Claiming To Report Them To A HR Department That** 7 **Does Not Exist.**

8 **1. Dorsey Invents The Fake HR Conspiracy**

9 60. In a video Dorsey posted on January 23, 2023, he concocted a
10 conspiracy theory that USPA frequently lies to whistleblowers reporting assault by
11 claiming to send their allegations to an HR department that does not exist (the “HR
12 Conspiracy”).

13 61. Dorsey begins the video (the “Skogsberg Video”) explaining that
14 USPA decided to go forward with a competition at a South Carolina gym after
15 Tronske received an email on July 13, 2022 (the “South Carolina Email”) from a
16 lifter stating the gym was owned by a registered sex offender named Aaron
17 Skogsberg.

18 62. Then, after describing the South Carolina Email, Dorsey displays an
19 image of an email Tronske sent to a redacted email address stating, “We are
20 extremely disappointed with this unacceptable behavior and the matter is pending
21 further investigation and submission to our Human Resources Rep. to determine
22 appropriate disciplinary action” (the “HR Email”).

23 63. Dorsey then announces he has identified a “pattern” in which Tronske
24 “always gets these emails” (e.g., allegations of sexual misconduct) and then tells
25 the whistleblower that he is going to send their report to HR.

26 64. Dorsey implies this is a rouse and USPA does not actually have an
27 HR department. Afterall, Dorsey notes the supposed HR department is not listed
28

1 on USPA’s website, and the HR department allegedly does not “ever respond to
2 this shit.”

3 65. This is an intentional fabrication. Tronske did not send the HR Email
4 in response to the South Carolina Email. The two have nothing to do with each
5 other. However, Dorsey clearly suggests the opposite by showing one after the
6 other (i.e., an email to Tronske from a redacted sender alleging sexual misconduct,
7 followed by an email from Tronske to a redacted recipient promising to report the
8 matter to HR).

9 66. Tronske sent the HR Email to a USPA Referee after she sent him her
10 statement alleging a USPA employee physically assaulted her. After sending her
11 the HR Email, USPA did in fact report the incident to HR. But, before HR entered
12 a final recommendation, USPA terminated the employee on other grounds.

13 67. Further, the “pattern” Dorsey claims to have identified is based on a
14 single email that Dorsey knows was unrelated to Skogsberg. However, by using
15 the email out of context and referring to other unidentified “allegations,” Dorsey
16 makes it seem—as he represents—that Tronske “always” tells whistleblowers that
17 he is sending their matter to HR.

18 68. Dorsey’s message is clear: USPA harbors criminals and sex offenders,
19 and no one is safe at a USPA meet. Indeed, in one Instagram comment, Dorsey
20 branded USPA the “United States p3do Association.”

21 2. Dorsey Intentionally Presents Misleading Evidence

22 69. Over the next several days, Dorsey propped up his conspiracy theory
23 with misleading evidence that USPA supposedly admitted to not having an HR.

24 70. On January 25, 2023, Dorsey published two comments suggesting he
25 had proof that USPA admitted to not having an HR. On January 26, 2023, Dorsey
26 posted a comment stating, “[F]ire [M]ike Tronske for not taking victims of abuse
27 emails seriously and pretending to send them to an HR department that they have
28

1 since admitted never existed!” And, on January 27, 2023, Dorsey posted an audio
2 recording of Denison stating USPA did not have HR.

3 71. This was an intentional distortion of the truth.

4 72. On January 23, 2023—the same day Dorsey posted the Skogsberg
5 Video and created the HR Conspiracy—Denison and Tronske hosted a virtual
6 meeting from their offices in California with a number of its Meet Directors and
7 State Chairs, including Corey Knight.

8 73. On information and belief, another Meet Director sent Dorsey a
9 recording of the meeting.

10 74. During the meeting, Knight, who likely had just watched the
11 Skogsberg Video, addressed Denison and stated, “There’s no HR person. You lie,
12 just say it. People would much rather hear that.” Denison confusingly responded,
13 “All we have is an EC, you know, we don’t have an HR.”

14 75. Denison meant that USPA does not have an HR department for its
15 Meet Directors, but it has an HR for its National Office employees. The EC or
16 Executive Committee functions as the de facto HR for the Meet Directors.

17 76. Minutes later, Denison and Tronske clarified this point. Tronske
18 stated, “I think, Steve, you misspoke in regard[s] to ‘We don’t have HR.’ We do
19 have an HR, but . . . it’s just for employees.” Denison agreed: “It’s just for our
20 full-time employees.”

21 77. However, this clarification appeared nowhere in Dorsey’s January 25
22 or 27th posts where he flatly asserts that USPA has admitted it has no HR. For
23 example, in the January 27, 2023 post, Dorsey only uploaded a recording of the 17
24 second exchange between Denison and Knight where Denison says, “We don’t
25 have an HR.”

26 78. This was intentionally misleading. Dorsey knew USPA had an HR,
27 but, instead of presenting the truth, he cherrypicked a misleading quote and used it
28 to support his false narrative.

1 **3. Dorsey Stokes The Flames Of The HR Conspiracy**

2 79. Dorsey repeated and embellished these fabrications in an interview he
3 did in or around February 2023 as part of his effort to drive people away from the
4 USPA.

5 80. In the interview, Dorsey states, “[T]he whole problem with the USPA
6 was we had a lot of reports and they were sent to this email inbox and none of
7 them were fucking handled.”

8 81. In the interview, he also falsely claimed he “pitched” to USPA the
9 idea of having a board that oversees complaints but “[USPA] told [Dorsey and his
10 affiliates] to go fuck themselves.”

11 82. This is all false. There is no trove of emails that were sent to HR that
12 were never handled.

13 83. Dorsey made this up out of whole cloth. USPA’s HR only received
14 emails from USPA’s National Office Staff concerning matters with USPA’s full
15 time employees in its National Office. Meaning, Dorsey would have no means of
16 knowing what matters were submitted to HR or whether they were handled.

17 84. On information and belief, the HR Email is the only record Dorsey
18 has of a matter being referred to HR. And, that matter was handled. The employee
19 was terminated.

20 85. Also, Dorsey has never “pitched” any idea to USPA. USPA has never
21 met with Dorsey or had a substantive phone call with him.

22 86. Regardless, Dorsey uses these untruths to perpetuate the myth that no
23 one is safe at USPA because USPA is riddled with sex offenders, and the top
24 executives not only know this but actively protect the many sex offenders within
25 the organization.

1 **B. Dorsey Falsely Claims USPA Does Not Conduct Background**
2 **Checks**

3 87. On January 14, 2023, Dorsey released his first video about USPA, and
4 Steve Denison reached out to Dorsey from his personal Instagram account
5 (@uspastevedenison) to correct falsehoods and provide clarifying information.

6 88. Dorsey asked, “what kind of check or background check is done on
7 referees / chairs before appointing?” Denison responded that USPA “does a
8 background check on all new referees and anyone volunteering for a position in the
9 USPA” to ensure there are no “sexual offenders or pedophiles” working for the
10 organization.

11 89. On or around January 16, 2023, USPA sent Dorsey a message from its
12 @uspapower account stating, USPA runs “background checks through the national
13 sex offender registry.”

14 90. Nonetheless, on January 17, 2023 Dorsey released two posts, falsely
15 claiming that USPA does not perform background checks, and he has continued to
16 spread this false narrative.

17 91. For example, on January 28, 2023, Dorsey posted a video discussing
18 the fallout of his campaign against USPA, stating: “Did you guys really hire a PR
19 firm before you implemented background checks?”

20 92. Dorsey has repeatedly spread this falsehood in comments and captions
21 on his videos. For example, Dorsey stated on January 17, 2023, “Steve lied to all
22 of you when he said they were doing background checks in 2020. They never did.
23 Steve lied.”

24 **C. Sullivan Conspires With Dorsey To Defame USPA**

25 93. Sullivan conspired with Dorsey to spread defamatory statements about
26 USPA in an effort to drive the company out of business.

27 94. Defendants each agreed to defame USPA and drive it into the ground
28 in order to increase Defendants’ notoriety and, in turn, their social media

1 following. Indeed, Sullivan has publicly admitted to working with Dorsey in his
2 smear campaign. For instance, on January 22, 2023, Sullivan thanked Dorsey for
3 helping him ostracize USPA, stating, “Thanks for the assist on this @goob_u2
4 grateful to call you a friend even if you scare the shit out of me with the extent of
5 your capability lmao.”

6 95. Sullivan has admitted to working with Dorsey since the beginning.
7 For example, on January 17, 2023, Sullivan commented on one of Dorsey’s posts,
8 “[I] have been engaged with this story from the beginning dude.”

9 96. Sullivan furthered the conspiracy by sharing Dorsey’s posts on his
10 own Instagram. This had a profound effect because Sullivan is a renowned
11 powerlifter with significant influence in the powerlifting community. By sharing
12 Dorsey’s posts and repeating his falsehoods, Sullivan gave the falsehoods a
13 credibility in the powerlifting world that Dorsey alone could not provide.

14 97. Sullivan also furthered the conspiracy by conducting research for
15 Dorsey. On information and belief, Dorsey directed Sullivan to set up a call with
16 Tronske, record it, and try to capture a sound-bite Dorsey could use.

17 98. On January 21, 2023, Sullivan called Tronske, who was in California,
18 and asked if he could record the call. Tronske consented on the condition that
19 Sullivan only use the recording for personal, note-taking purposes and not share it.

20 99. Sullivan falsely promised he agreed and immediately shared the
21 recording with Dorsey (who admittedly possesses the full recording, including
22 Tronske’s statements that he did not consent to sharing the recording).

23 100. The next day, on January 22, 2023, Dorsey posted a clip from the call
24 of Tronske and falsely stated that Tronske admitted that USPA does not conduct
25 background checks.

26 101. Sullivan also advanced the conspiracy by tagging USPA Meet
27 Directors and Sponsors in Dorsey’s posts, demanding they disassociate with USPA
28 or be labeled complicit in USPA’s alleged evil machinations. (*See* Section V.)

1 102. Sullivan did not simply share Dorsey’s posts. He repeated the false
2 statements, including the HR Conspiracy. In or around late January 2023, Sullivan
3 posted, “how can anyone be expected to trust @usapower when there was no HR
4 department all of these complaints were sent to? I am in disbelief.”

5 **D. Dorsey Reiterates His Statements Are “True” And “Facts” And**
6 **Appeals To His Credentials To Bolster His Claims**

7 103. To substantiate these claims, Dorsey contends that he has recordings
8 of USPA admitting that it has no HR department and does not run background
9 checks, he has done his due diligence in investigating these claims, he is telling the
10 truth, and he should be trusted because he is a journalist and a law school graduate.

11 104. For example, on January 25, 2023, Dorsey responded to someone
12 questioning his claims, stating, “I have a recording of the president on a 77 minute
13 phone call admitting to no background checks and another audio clip of them
14 admitting to no HR – so yes – I do my due diligence and yes they have admitted
15 everything I’ve claimed was true. Where’s yours law degree from? I graduated
16 pitt law.”

17 105. The same day, Dorsey stated in a comment, “I just cover the truth.
18 I’m a journalist. It’s not about ‘a chance to change’ it’s about the lies they got
19 caught in. Namely with HR that didn’t exist and background checks that never
20 happened.”

21 106. This is all specious bluster. As noted above, USPA never “admitted”
22 to not having HR. Dorsey simply plucked a quote out of context to mislead his
23 audience into believing USPA had no HR.

24 107. Dorsey did not do his due diligence as a law school graduate or as a
25 self-anointed journalist. He fabricated the HR Conspiracy out of whole cloth and
26 falsely claimed that USPA does not run background checks despite USPA’s
27 unequivocal messages to the contrary.

28

1 108. Dorsey does not have a 77 minute recording of USPA’s President
2 admitting that USPA does not perform any background checks. In actuality,
3 Dorsey has the recording of the January 21, 2023 phone call between Joe Sullivan
4 and Tronske that Sullivan made and shared without Tronske’s consent. At no
5 point during the call did Tronske state that USPA does not run any background
6 checks.

7 109. In an attempt to further bolster his claims, Dorsey falsely claimed in
8 an interview to have called USPA’s attorney and brow beat him into admitting that
9 USPA does not have a case against Dorsey.

10 110. Specifically, Dorsey claimed: “I called the attorney for the for the
11 USPA, which is like, it’s like because I’m aggressive as fuck. Nobody’s going to
12 cease and desist me and make me shut up. I’m going to call your fucking attorney
13 before you cease and desist me. And I said, ‘Hey, I’m the guy in that email that
14 you guys are talking about. One, big fucking mistake. I don’t know if you really
15 want to to disparage me publicly to your 40, 60, 80,000 members. And two, don’t
16 be a pussy and cease and desist me. File or shut the fuck up.’ And he was like ‘oh
17 we’re not, we’re not, we’re not doing anything. You know, that’s that’s not a thing
18 that we’re doing.’ I was like, ‘Okay, thanks.’ And hung up like, go fuck yourself,
19 bro.”

20 111. This did not happen. Dorsey has never spoken with the undersigned
21 counsel, nor any other attorney at Stradling Yocca Carlson & Rauth. On
22 information and belief, based on discussions with USPA’s prior counsel, Dorsey
23 has never spoken with USPA’s prior counsel, Richard Rudolph, either.

24 **E. Dorsey Falsely Claims USPA Failed To Act When It Learned of**
25 **Agents’ Misconduct**

26 **1. Stephanie Bennett**

27 112. On January 14, 2023, Dorsey posted a video about Stephanie Bennett,
28 a former Meet Director and Vermont State Chair. Dorsey’s video included footage

1 someone else had posted earlier showing Stephanie Bennett putting her hands
2 down her pants and then rubbing her hands on what appears to a be neighbor's
3 front door (the "Bennett Video").

4 113. In Dorsey's post, he claims that after the Bennet Video surfaced,
5 USPA President Denison promised to "address" the situation but never did.

6 114. This is false. Tronske terminated Bennett on January 8, 2023—two
7 days after seeing the Bennett Video. Meaning, when Dorsey claimed on January
8 14, 2023 that USPA never "address[ed]" the situation, Bennett had already been
9 terminated for almost a week.

10 115. Shortly after Dorsey posted his video on January 14, 2023, Denison
11 messaged Dorsey that Bennett had already been terminated, but Dorsey refused to
12 retract his false statement.

13 116. Before posting the video, Dorsey did not contact USPA to ask if it had
14 taken any disciplinary action against Bennett. On information and belief, he did
15 not reach out to Bennett either.

16 117. In the January 14, 2023 post, Dorsey also knowingly misrepresented
17 that Denison "never followed up" on a series of complaints lodged against Bennett
18 by a lifter named Tyrell Sykes.

19 118. Dorsey knew this was false because he possesses email
20 correspondence between Denison and Sykes showing USPA following up with
21 Sykes, asking for more information about his claims, and investigating his
22 allegations.

23 2. Chico Cloyne

24 119. On January 22, 2023, Dorsey posted a video about Roman "Chico"
25 Cloyne (the "Cloyne Video"), who served as USPA's Vice President of Business
26 Development from August 1, 2022 to January 21, 2023, the day before Dorsey's
27 video.

28

1 120. In the Cloyne Video, Dorsey claims that USPA fired Cloyne earlier
2 that day because USPA feared that stories about Cloyne would “com[e] out.” He
3 proclaimed, “You fired Chico to save yourselves.”

4 121. This is false. USPA fired Cloyne on January 21, 2023 due to an
5 offense that came to USPA’s attention on January 20, 2023.

6 122. Before posting the Cloyne Video, Dorsey did not contact USPA to
7 inquire about its reasons for terminating Cloyne. On information and belief, he did
8 not reach out to Cloyne or any other person either.

9 123. In the Cloyne Video, Dorsey also alleged that a female powerlifter,
10 E.C., reported a violent incident involving Cloyne (“E.C. Incident”) to USPA and
11 that Tronske responded via email on January 4, 2023 saying that he would forward
12 the matter to HR, but “Nothing ever became of it.”²

13 124. To the contrary, USPA conducted an extensive internal investigation
14 of this incident starting in December 2022 and ultimately filed a report with HR on
15 January 11, 2023.

16 125. However, before HR had an opportunity to make a recommendation
17 regarding this assault, USPA terminated Cloyne for a separate offense.

18 126. Dorsey would have known that his claims were false if he had reached
19 out to USPA to confirm his allegations, but he chose not to.

20 **III. DEFENDANTS WHIP DEFAMATORY STATEMENTS INTO A**
21 **GIANT SCANDAL AMONG CALIFORNIA POWERLIFTERS IN**
22 **EFFORT TO INCREASE DEFENDANTS’ FOLLOWING AND**
23 **NOTORIETY**

24 127. Defendants’ singular and stated goal is to “take down” USPA, a
25 California corporation whose membership base is disproportionately represented
26 by California citizens.

27
28 _____
² This is the HR Email that Dorsey later uses to establish the HR Conspiracy.

1 128. Though they profess the nobility of their cause, Defendants’ motive in
2 targeting USPA is self-aggrandizement. Their plan is to promote themselves as the
3 “heroes” who “exposed” USPA and, in turn, attract more social media followers.

4 129. Dorsey and, to a lesser extent, Sullivan, are the primary sources of the
5 misinformation about USPA, in that they authored and spread the information
6 themselves.

7 130. As several Instagram comments show, the lies about USPA were not
8 publicly available and could only be found on Defendants’ social media accounts.
9 For instance:

10 a. In one comment, Instagram user @doug.robertson asks: “What’s
11 going on? I tried googling and couldn’t find anything.” In response,
12 @jared_bobak states: “Watch the past weeks videos on @goob_u2.” Similarly,
13 @diwade.921 states: “@goob_u2 and @joesullivan_aod have reels about it. Goobs
14 has most of it.”

15 b. In another comment, Instagram user @lil_raspy states: “I tried
16 googling what’s going on...what’s happening with USPA?” In response,
17 @izzyparra.s states: “go watch @goob_u2 !” In addition, @badazz_mentality asks
18 “@5foot2cool is this true,” and @5foot2cool responds “yes look at @goob_u2
19 page.”

20 c. In yet another comment, Instagram user @feelingfitish states: “I’m so
21 lost.” In response, @djredmond22 states: “go check out @goob_u2 he found a lot
22 of scumbags being covered up.” In addition, @kg_strength states: “read above,
23 same question was asked. Looks like sex offenders are part of USPATX & pioneer
24 belts has stopping helping with sponsorships.”

25 d. In a comment on another post, Instagram user @the_fitkid states “I
26 looked and I don’t see an explanation,” and @jared_bobak responds “watch
27 [Dorsey’s] last week’s worth of videos.”
28

1 e. In another comment, Instagram user @crandall.fitness posted “??” In
2 response, @bigdaddyemily states: “go to @goob_u2 page.”

3 **A. The Defamation and Public Outcry Concerns USPA’s California**
4 **Conduct**

5 131. On information and belief, Defendants knew that USPA is
6 headquartered in California and that Denison and Tronske are California residents.
7 For instance, USPA’s website’s Contact Us lists a California address, and Steve
8 Denison’s personal Instagram account, which Dorsey messaged, shows pictures of
9 him living in California.

10 132. While many of Dorsey’s posts begin by alleging that a USPA
11 contractor committed a crime or was charged with an offense, the thrust of
12 Dorsey’s defamation concerns what USPA’s California leadership knew and did
13 from its California headquarters.

14 133. For example, the HR Conspiracy concerns whether Tronske, a
15 California resident, reported allegations to USPA’s California-based National
16 Office’s HR. The background check conspiracy concerns whether Denison, a
17 California resident, lied when he said that USPA’s National Office was
18 implementing background checks. Similarly, the false statements about Bennett
19 and Chico concern USPA’s termination of them and whether USPA’s leadership
20 investigated the claims against them.

21 134. This is not lost on Defendants’ followers. The public outrage
22 concerns Defendants’ allegations against USPA and its California leadership,
23 rather than the individuals who are the subject of Dorsey’s videos.

24 135. The following comment from Instagram user @allisonjoyfitness aptly
25 sums up the public’s takeaway from Defendants’ smear campaign: “[USPA] wont’
26 change from the top. They pretended they changed their policy in 2020 when they
27 said they implemented background checks and didn’t. If this is an organization for
28 the lifters, they’d have taken peoples reports of issues with refs and directors that

1 are the ‘sickos’ seriously, but everyone’s valid complaints fell on deaf ears. It’s
2 not dramatic when we see how many times they have failed to follow through. I’m
3 seeing tons of meet directors and refs leave the federation since all of this has been
4 made public and they realize they weren’t just dealing with a one off situation. If
5 they hadn’t lied before then maybe people would be less ‘dramatic.’”

6 **B. Defendants Tarnish USPA’s Reputation In California**

7 136. As part of their effort to take down USPA, Defendants purposefully
8 increased the circulation of their defamatory statements among the California
9 public by tagging California people and entities, including USPA (@USPAPower)
10 and California Meet Directors.

11 137. The list of Californians that Dorsey tagged includes but is not limited
12 to: USPA (@USPAPower), Steve Denison (@USPASteveDenison), USPA’s
13 California branch (@USPACalifornia), and Larry Pollack (a California Meet
14 Director).

15 138. Sullivan also tagged Californians, including California Meet Director
16 Lord Elliott and California Meet Director and gym owner, Rick Simmons.

17 139. By tagging these people and entities, Defendants purposefully
18 directed their defamation towards a California audience. They did not tag these
19 people just to spread the message to California. They tagged these Californians to
20 intimidate them or—in the case of USPA—their followers to disassociate with
21 USPA or else be judged by their Californian neighbors as complicit in USPA’s
22 conduct.

23 140. Defendants’ defamation injured USPA’s reputation in the estimation
24 of the California public. On January 18, 2023, one of Dorsey’s followers wrote,
25 “@uspacalifornia you guys are too late. Y’all an embarrassment.”

26 141. California gyms announced that they would no longer host USPA
27 meets, which forced California Meet Directors to cancel upcoming meets. For
28 example, Robert Speno, a California Meet Director, had to cancel three USPA

1 meets because Barbell Brigade in Los Angeles and Fitness Underground Gym in
2 Upland refused to host the meets.

3 142. Another California meet director, Lord Elliott, simply stopped running
4 meets after he had to cancel one in Coalinga, California due to low participation
5 and another gym, the Iron Office in Fresno, refused to host USPA events.

6 **C. Defendants Drive People To Join California Competitor**

7 143. As a part of their scheme to “take down” USPA, Defendants have
8 sought to push USPA’s members and Meet Directors to join World Raw
9 Powerlifting Federation (“WRPF”), a California-based competing powerlifting
10 federation.

11 a. For instance, on March 2, 2023, Dorsey posted the cease and desist
12 letter he received from USPA on Instagram and tagged WRPF.

13 b. In addition, on March 9, 2023, Dorsey appeared on Episode #186 of
14 the YouTube show Hybrid Unlimited. In the interview, Dorsey explains that
15 WRPF invited him to commentate for the Ghost Clash meet—one of WRPF’s most
16 prominent events—despite admitting that he doesn’t “know anything about
17 powerlifting.” In the video, Dorsey is wearing a “Ghost Clash” t-shirt, in-effect
18 promoting the WRPF while telling the world about how he “brought down” USPA
19 and what a terrible organization USPA is. He goes on to say “I think the only way
20 to get rid of [USPA] is for everybody to join a federation that gives a shit about
21 you.”

22 c. On information and belief, Sullivan has joined WRPF and is actively
23 moving his clients to WRPF from USPA so that they can compete in WRPF meets
24 instead of USPA meets and pay membership dues to WRPF instead of USPA.

25 144. Dorsey’s promotion of WRPF is particularly galling because he has
26 been made aware of accusations regarding WRPF which mirror the accusations
27 against USPA that Dorsey purports to take such great issue with. For example:
28

1 a. In one comment, Instagram user @jesska_smith commented: “Jesus.
2 It never ends. Just Someone let him loose on the WRPf so everyone can quit
3 acting like a USPA is the only problem [] powerlifting is toxic in both feds.”
4 Instagram user @rockflageagle replied to this comment stating: “@jesska_smith a
5 prominent power lifter in the WRPf has threatened to shoot an ex and had to go to
6 court over it. There is PLENTY of juice to squeeze there from that ONE guy, can
7 imagine there’s a few others trying to skate by, too.” In response, @jesska_smith
8 stated: “@rockflageagle I know for a FACT there’s a lot to squeeze.”

9 b. In another comment, Instagram user @pchang978 commented” “Glad
10 you’re bringing this to light. You’ve got some pedo, predator, and domestic
11 abusers in the WRPf too (refs). Basically no fed is morally safe to compete in
12 these days and it’s a damn shame.”

13 c. In his appearance on Hybrid Unlimited, Dorsey states that he is aware
14 that WRPf does not run background checks but excuses it because “they reached
15 out to [him].”

16 145. Dorsey’s unrelenting aggression against USPA juxtaposed with his
17 apparent indifference towards similar issues within WRPf further suggests that his
18 intentions are not as pure as he professes. It is clear that Dorsey’s singular goal is
19 to “take down” USPA so that he can promote himself as the “hero” who exposed
20 their alleged evil ways. Indeed, the episode of Hybrid Unlimited that Dorsey
21 appeared on is entitled (in part) “How I Brought Down USPA,” and during the
22 interview, Dorsey boasts about how he destroyed USPA.

23 **IV. Dorsey And Sullivan Engage In A Coordinated Attack To Drive Meet**
24 **Directors, Members, and Sponsors To Leave USPA**

25 146. Sullivan and Dorsey have engaged in a coordinated social media
26 attack to spread defamatory statements about USPA to cause its members, Meet
27 Directors, and sponsors to abandon USPA, and, thereby drive it into the ground.
28

1 147. For instance, in a comment on Dorsey’s January 28, 2023 post,
2 Sullivan commented: “Jump ship or go down with it. I’m very sorry I couldn’t
3 help you, but at this point it’s very obvious nobody could. RIP to the USPA.”

4 148. Dorsey posted screen shots of several sponsors announcing that they
5 are leaving USPA, captioning the post: “Thank you to all of the former USPA
6 sponsors who are voting with their wallets.”

7 149. Both Sullivan and Dorsey have made an emphasis of pushing
8 sponsors and Meet Directors to leave USPA. For example, Sullivan tagged several
9 USPA Meet Directors in an Instagram story (“Sullivan Instagram Story”), stating:
10 “Tagging everyone who has remained whom I have respect for. No response
11 needed, but this is a continuing effort into how horribly you can treat your
12 consumer base and still retain them due to fear.” Further, Dorsey contacted USPA
13 sponsor Pioneer Belts directly in an effort to persuade it not to sponsor a USPA
14 event, and it ultimately did not sponsor this event.

15 150. After Meet Director Danny Sawaya, who operates the Instagram
16 account @tucsonstrength, announced in an Instagram video that he intended to
17 remain with USPA, Dorsey commented stating “I’ll likely be covering
18 @tucsonstrength and his commentary in a video soon.”

19 151. As a direct and proximate result of the false statements in Dorsey’s
20 posts and Dorsey’s and Sullivan’s concerted social media conduct, many USPA
21 Meet Directors have left USPA for other federations or stated that they would no
22 longer host meets.

23 152. For example, Leonetta Richardson, a Meet Director from Moreno
24 Valley, California, left the USPA and joined WRPF in the wake of Defendants’
25 posts.

26 153. On February 20, 2023, Meet Director Jordan Jarrell, one of the Meet
27 Directors tagged in the Sullivan Instagram Story, texted Denison to let him know
28 he “[wouldn’t] be hosting any more USPA meets.” Jarrell operates the Instagram

1 account @dadbod220, which was tagged in the Sullivan Instagram Story. Jarrell is
2 now a meet director for WRPF.

3 154. On January 29, 2023, Meet Director Sergio Luna announced on his
4 Instagram that he “ha[d] submitted [his] resignation letter and once all [his]
5 obligations have been met, [he] will be stepping down” because he “can no longer
6 stand with [USPA] in the same confidence [he] once had.” Luna is now a meet
7 director for WRPF.

8 155. On March 19, 2023, Meet Director Christopher Nicolai announced on
9 his Instagram: “Due to the information released and how the situation was handled
10 among a list of many other reasons this past weekend was my last meet as a USPA
11 meet director.” Nicolai is now a Meet Director for WRPF.

12 156. Defendants’ conduct is projected to cost USPA over \$600,000 in
13 revenue over the next year.

14 157. Defendants are continuing to tarnish USPA’s reputation, while riding
15 the coattails of this scandal that they have manufactured. All the while, USPA’s
16 brand is suffering more and more damage, and the organization is continuing to
17 lose sponsors, members, and meet directors.

18 **FIRST CAUSE OF ACTION**

19 **Defamation**

20 *(Against Defendant John Dorsey)*

21 158. Plaintiff repeats, realleges, and incorporates by reference the
22 allegations of paragraphs 1 through 157 as though fully set forth herein.

23 159. USPA is a private figure. It does not occupy a position of such
24 persuasive power and influence that it can be deemed a public figure for all
25 purposes. In addition, it has not voluntarily injected itself into a public controversy
26 such that it can be deemed a public figure for a limited range of issues.

1 160. Dorsey made false, derogatory statements indicating USPA knew
2 about and covered up certain contractors and employees' bad acts and that USPA
3 does not have a background check process and lied about implementing one.

4 161. Specifically, Dorsey made false statements, including but not limited
5 to:

- 6 a. Claiming there was a pattern of USPA falsely telling whistleblowers
7 that it will forward their reports to HR;
- 8 b. Stating that USPA does not have an HR department and is lying about
9 having an HR department;
- 10 c. Claiming that he "pitched" to USPA the idea of having a board that
11 oversees complaints but "[USPA] told [Dorsey and his affiliates] to go
12 fuck themselves;"
- 13 d. Stating "the whole problem with the USPA was we had a lot of
14 reports and they were sent to this email inbox and none of them were
15 fucking handled;"
- 16 e. Stating that USPA does not run background checks and lied about
17 implementing background checks;
- 18 f. Intentionally taking a recording of a call between Sullivan and
19 Tronske out of context to create the false impression that USPA
20 admitted it does not run background checks;
- 21 g. Claiming to have called USPA's attorney and brow beat him into
22 admitting USPA does not have a case against Dorsey;
- 23 h. Claiming that after the Bennet Video surfaced, Denison promised to
24 "address" the situation but never did;
- 25 i. Claiming that Denison promised to look into a series of complaints
26 lodged against Bennett by Sykes but "never followed up;"
- 27 j. Asserting that USPA "fired Chico [Cloyne] to save [itself];" and
28

1 k. Stating that USPA took no action when it learned about the E.C.
2 Incident.

3 162. USPA alleges that Dorsey’s defamatory statements and actions are
4 more extensive than that which is discussed above.

5 163. These statements were made on Dorsey’s public Instagram account
6 and were accessible to any Instagram user, and on information and belief, were
7 actually read and heard by thousands of Instagram users.

8 164. The defamatory statements were made to third parties who understood
9 the defamatory meaning behind the statements and who understood that such
10 defamatory statements were specifically and unambiguously being made about
11 USPA.

12 165. The above described defamatory statements made by Dorsey were
13 untrue and were made solely to injure USPA in respect to its trade, profession and
14 business by imputing general disqualification with its occupation. Hence, such
15 defamatory statements constitute libel per se.

16 166. Dorsey knew some of the defamatory statements he made were untrue
17 or had serious doubts about the truth of the statement, and Dorsey failed to use
18 reasonable care to determine the truth or falsity of his other defamatory statements.

19 167. Dorsey made the above statements with malice, hatred and ill will,
20 and the intent and purpose behind these defamatory statements was to harass,
21 malign, and destroy USPA’s reputation and increase Dorsey’s own notoriety.

22 168. As a direct and proximate result of Dorsey’s wrongful conduct, USPA
23 has suffered and continues to suffer actual damages in an amount to be determined
24 at trial.

25 ///

26 ///

27 ///

28 ///

1 **SECOND CAUSE OF ACTION**

2 **Intentional Interference with Contractual Relations**

3 *(Against Defendants John Dorsey and Joe Sullivan)*

4 169. Plaintiff repeats, realleges, and incorporates by reference the
5 allegations of paragraphs 1 through 168 as though fully set forth herein.

6 170. USPA had established contractual relationships with several Meet
7 Directors. A true and correct copy of a standard Meet Director Agreement is
8 attached hereto as Exhibit A. USPA’s contracts with its Meet Directors were at-
9 will.

10 171. Defendants were aware of USPA’s contractual relationships with
11 these Meet Directors. Indeed, both Sullivan and Dorsey have made an emphasis of
12 pushing Meet Directors to leave USPA. For example, Sullivan tagged several
13 USPA Meet Directors in the Sullivan Instagram Story, stating: “Tagging everyone
14 who has remained whom I have respect for. No response needed, but this is a
15 continuing effort into how horribly you can treat your consumer base and still
16 retain them due to fear.”

17 172. In addition, Dorsey made a post about at least one Meet Director
18 (Stephanie Bennett). He has a recording of Tronske explaining that the USPA
19 Executive Committee functions as the de facto HR for Meet Directors because they
20 are not USPA employees, and he received that recording from a Meet Director.
21 All of this further evidences that Dorsey was aware of USPA’s contractual
22 relationships with Meet Directors.

23 173. Defendants intended to disrupt the performance of the contractual
24 relationships between USPA and its Meet Directors, or knew that disruption of
25 performance was certain or substantially certain to occur, by intentionally and
26 maliciously defaming and conspiring to defame USPA in the hopes that it would
27 induce Meet Directors to terminate their business relationships with USPA.
28

1 Defendants' defamatory and conspiratorial conduct constitutes independently
2 wrongful conduct.

3 174. Defendants' conduct actually induced or caused, and will continue to
4 induce or cause, USPA's Meet Directors to terminate or reduce their contractual
5 relationships with USPA.

6 175. As a direct, proximate, and foreseeable result of Defendants' actions,
7 USPA has suffered and continues to suffer substantial losses and damages in an
8 amount to be proven at trial.

9 **THIRD CAUSE OF ACTION**

10 **Promissory Fraud**

11 *(Against Defendant Joe Sullivan)*

12 176. Plaintiff repeats, realleges, and incorporates by reference the
13 allegations of paragraphs 1 through 175 as though fully set forth herein.

14 177. Sullivan promised Tronske on January 21, 2023 at the start of his call
15 with Tronske that if Tronske allowed Sullivan to record the call, Sullivan would
16 not release the recording to any person who was not on call.

17 178. This was an intentional misrepresentation. Sullivan intended to
18 release the recording to Dorsey when he made this promise.

19 179. Tronske reasonably relied on Sullivan's promise not to release the
20 recording to any person who was not on the call.

21 180. Sullivan intended that Tronske rely on this promise, because Tronske
22 stated that he would not consent to the recording unless Sullivan promised not to
23 release the recording to anyone not on the call.

24 181. Sullivan released the recording to Dorsey on January 21, 2023 or
25 January 22, 2023.

26 182. As a direct, proximate, and foreseeable result of Tronske's reliance on
27 Sullivan's promise, USPA has suffered and continues to suffer substantial losses
28 and damages in an amount to be proven at trial.

FOURTH CAUSE OF ACTION

Conspiracy

(Against Defendants John Dorsey and Joe Sullivan)

183. Plaintiff repeats, realleges, and incorporates by reference the allegations of paragraphs 1 through 182 as though fully set forth herein.

184. Defendants formed an agreement and common design to defame USPA that constituted a wrongful civil conspiracy.

185. As set forth above, the object of the conspiracy was to defame USPA and drive it into the ground in order to increase Defendants’ notoriety and, in turn, their social media following. Each of the Defendants knowingly participated in one or more material aspect of the civil conspiracy through overt acts alleged above. Upon information and belief, Defendants had a meeting of the minds as to the objectives and benefits to be obtained, as well as the harm that would—and ultimately did—proximately result.

186. As set forth above, Defendants each agreed to defame USPA and drive it into the ground in order to increase Defendants’ notoriety and, in turn, their social media following.

187. To further the conspiracy, Dorsey (1) published 19 Instagram Posts and Reels and hundreds of Instagram Stories defaming USPA (“posts”); and (2) gave an interview in February 2023 in which he further defamed USPA. Between the posts and the interview, Dorsey made the defamatory statements identified in paragraphs 161(a) through 161(k) above.

188. In furtherance of the conspiracy, Sullivan (1) shared Dorsey’s posts on his own Instagram, which, because Sullivan is a renowned powerlifter with significant influence in the powerlifting community, gave Dorsey’s falsehoods a credibility in the powerlifting world that Dorsey alone could not provide; (2) set up a call with Tronske and recorded it in an effort to capture a sound-bite that Dorsey could use to paint USPA in a negative light; (3) falsely promised Tronske he would

1 not release the recording and then provided the recording to Dorsey for use in one
2 of his posts; (4) tagged USPA Meet Directors and Sponsors in Dorsey’s posts,
3 demanding they disassociate with USPA or be labeled complicit in USPA’s alleged
4 evil machinations; (5) repeated Dorsey’s false statements.

5 189. As a result, Defendants are jointly and severally liable for the
6 damages caused to USPA.

7 **JURY DEMAND**

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

9 **PRAYER FOR RELIEF**

10 **WHEREFORE**, Plaintiff prays for judgment and relief against Defendants
11 as follows:

- 12 1. For damages in an amount to be proven at trial;
- 13 2. For an award of punitive damages; and
- 14 3. For such further relief as the Court deems just and proper.

15
16 DATED: April 28, 2023

STRADLING YOCCA CARLSON & RAUTH
A PROFESSIONAL CORPORATION

17
18 By: /s/ Shawn Collins
19 Shawn Collins

20 Attorney For Plaintiff
21 Denison Powerlifting Inc.,
22 dba United States Powerlifting Association
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