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IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

TAMARA RUBIN, an individual, **LEAD SAFE MAMA, LLC**, an Oregon limited liability company,

Plaintiffs,

v.

ERIC RITTER, an individual, and **FLUORO-SPEC, INC.**, a New York corporation, and **SPIROCHAETE RESEARCH LABS, LLC aka "SCITUS LABORATORY PRODUCTS,"** a New York limited liability company,

Defendants.

Case No.

COMPLAINT

(Defamation Per Se; Defamation; Intentional Interference with Economic Relations, Injunctive Relief)

Prayer for Relief: \$2,942,000.00

Filing Fee: \$594.00 (ORS 26.160(1)(c))

NOT SUBJECT TO MANDATORY ARBITRATION

Plaintiffs Tamara Rubin ("Rubin") and Lead Safe Mama, LLC ("LSM"), (collectively "Plaintiffs"), by and through their undersigned counsel, bring this action against Defendants Eric Ritter, Fluoro-Spec, Inc., and Spirochaete Research Labs, LLC aka "Scitus Laboratory Products" (together, the "Ritter Defendants" or "Defendants") and allege as follows:

PARTIES, JURISDICTION, AND VENUE

1.

At all material times, Plaintiff Tamara Rubin is and was a resident of the State of Oregon, County of Multnomah.

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2.

At all material times, Plaintiff Lead Safe Mama, LLC is and was an Oregon limited liability company doing business in the State of Oregon, County of Multnomah.

3.

Upon information and belief, Defendant Eric Ritter (“Ritter”) is a resident of the State of New York, County of Suffolk. Defendant maintains addresses at 9 Technology Drive, East Setauket, NY 11733, and 5 Woodridge Lane, Coram, New York 11727.

4.

At all material times, Fluoro-Spec, Inc. (“Defendant FS”) is and was a New York corporation with a principal place of business at 9 Technology Drive, East Setauket, New York 11733.

5.

At all material times, Spirochaete Research Labs, LLC aka “Scitus Laboratory Products” (“Defendant SRL”) is and was a New York limited liability company with a principal place of business at 690 Route 25A, Suite 3, East Setauket, New York 11733.

6.

Upon information and belief, Ritter exercises complete domination and control over Defendants Fluoro-Spec, Inc. and Spirochaete Research Labs, LLC as their sole owner such that those entities have no independent existence separate from Ritter and serve as his alter egos. Ritter uses Fluoro-Spec, Inc. and Spirochaete Research Labs, LLC interchangeably and indistinguishably as a single enterprise, commingling assets, sharing personnel, and conducting business under multiple trade names — including “Scitus Laboratory Products — without regard to corporate formalities. The defamatory campaign described herein was conceived, directed, and

1
2 executed by Ritter personally and carried out through these corporate entities as instruments of
3 his individual will.

4 7.

5 The events giving rise to the claims in this Complaint took place in Multnomah County,
6 State of Oregon. LSM maintains its principal place of business in Oregon. Jurisdiction and venue
7 are proper in this Court.

8
9 **FACTUAL BACKGROUND**

10 8.

11 Plaintiff Tamara Rubin is a lead safety activist and the founder and owner of Plaintiff
12 Lead Safe Mama, LLC. Ms. Rubin founded LSM with the mission of: childhood lead poisoning
13 prevention and consumer goods safety education, providing families with access to science-
14 backed data and tools to help them limit exposure to heavy metals in their homes, schools and
15 communities. Ms. Rubin further focuses on advocacy efforts to identify contaminated products,
16 working with her established online community to demand that manufacturers improve products
17 and that they (or relevant agencies: CPSC, FDA, etc.) issue recalls when appropriate.

18 9.

19 Since founding LSM in 2018, Rubin has spearheaded numerous efforts to identify and
20 expose corporate use of lead and other heavy metals in household products, with a focus on
21 "with a focus on products designed and marketed for use by children. As a result, the company
22 has grown into a leading resource in the lead safety space.

23 10.

1
2 The Ritter Defendants maintain a substantial social media presence, primarily on their
3 Instagram account “ericeverythinglead,” where Ritter posts content related to lead safety and
4 sells lead testing products. As of April 2026, Defendants’ Instagram account has approximately
5 477,000 followers.

6 11.

7 On or about April 21, 2023, Plaintiffs and Defendant SRL entered into a contractual
8 agreement whereby Defendant agreed to pay LSM to advertise Defendants’ lead testing product
9 on LSM’s website. The contract expired on March 1, 2024. After expiration of the terms of the
10 contract — on about March 15, 2024, LSM proposed new contract terms as a starting point to
11 renegotiate renewing the contract in spite of the contract having expired. Instead of responding
12 to the proposed new terms by negotiating alternate terms, Defendants suddenly torpedoed
13 negotiations and began posting defamatory videos on March 17, 2024.

14 12.

15 Following the expiration of the contract, the Ritter Defendants initiated an aggressive,
16 relentless, and ongoing multi-year, systematic smear campaign against Plaintiffs’ reputation and
17 business through misleading, false, and defamatory statements published to their large social
18 media following on Instagram and other platforms including, without limitation, Facebook,
19 TikTok, YouTube, Reddit, and his company websites. The Ritter Defendants’ campaign was
20 conducted with actual malice and a deliberate intent to destroy Plaintiffs’ professional reputation,
21 business operations, and personal standing in the community.

22 13.

23
24 Between January 2024 and the date of this filing, the Ritter Defendants have published
25 well over two hundred videos, posts, and livestreams to their public Instagram account and other

1
2 platforms speaking negatively about Plaintiffs and their work. Many of the Ritter Defendants’
3 statements contain false, intentionally harmful, defamatory, and disparaging allegations against
4 LSM and Rubin personally. These defamatory livestream videos have frequently been published
5 on a daily basis, and sometimes multiple times per day.

6 14.

7 Although Defendants have made thousands of statements about Plaintiffs designed to
8 denigrate them and harm their business, the Ritter Defendants’ defamatory campaign centers
9 around, without limitation, three principal categories of false allegations: (1) that Ms. Rubin
10 committed insurance fraud in connection with a 2002 house fire; (2) that Ms. Rubin committed
11 tax and charity fraud, relying on charges that were investigated and dropped by the Oregon
12 Department of Justice; and (3) that Ms. Rubin intentionally exposed her own children to lead for
13 financial gain.

14 15.

15 The Ritter Defendants made the following specific false and defamatory statements and
16 published them to public social media accounts and followers, including but not limited to his
17 approximately 477,000 Instagram followers. These statements are representative and not
18 exhaustive of Defendants’ defamatory conduct:

19
20 **A. False Allegations of Insurance Fraud (2002 House Fire)**

- 21 i) *“Tamara is an idiot. Uh, she is just not even trying to prevent lead poisoning. She’s*
22 *trying to get a job right? Her husband doesn’t like to work. They started off their*
23 *career together, you know. It was her second marriage. I don’t know if it was his.*
24 *They tried to do a insurance job. Didn’t work, you know. They failed. Their house*
25 *burned down. They didn’t collect any money.”* (Instagram livestream, August 9,
2025)
- ii) *“And so, I mean, like what can you do to a person that’s done that? Like she’s*
perpetuated this idiotic fraud. She’s not even rich. She’s not, I mean, she’s broke as

1
2 *hell. 'Cause she doesn't, she doesn't know how to make money. She's stupid."*
(Instagram livestream, July 31, 2025)

- 3 iii) *"Her best idea to get money was actually try to scam the insurance company in 2002*
4 *or 2003. She said her house burned down and it got robbed."* (Instagram livestream,
5 July 31, 2025)
- 6 iv) *"Because the truth about Tamara Rubin is that she tried to defraud her insurance*
7 *company in 2002 saying that her house was robbed, it was worth all this money. She*
8 *had no money and couldn't have afforded any of those objects."* (Instagram
9 livestream, February 18, 2026)
- 10 v) *"That you were, um, you know, she referred to this 2002 incident, uh, about her*
11 *house fire as like being raped. But then I, I got all the records and like she's raping*
12 *them the way she's running them around these fraudulent claims. Absolutely insane.*
13 *Insane. She clearly was trying to get a payday."* (Instagram livestream, February 19,
14 2026)

15 **B. False Allegations of Tax and Charity Fraud (2017 Dropped Charges)**

- 16 i) *"Tamara Rubin is a ACE tax evader a liar. Literally not even like, oh yeah, no, this is*
17 *an expense. Saying like, yeah, no, this is an expense. I'm withdrawing cash from the,*
18 *from the ATM, from the PayPal account of the charity, \$160,000. OMG. That's some*
19 *wild work. Cash withdrawals, buying stuff. Oh, I'm paying myself back."* (Instagram
20 livestream, February 19, 2026)
- 21 ii) *"Tamara was living off of this charity as her exclusive source of income and claiming*
22 *that she was just paying herself back. With what money? And, you know, she never*
23 *took any salary from the charity because she would have probably had to pay taxes*
24 *on that. So instead of doing that, she just took money from the charity. I mean, that's*
25 *fraud, obviously."* (Instagram livestream, February 26, 2026)
- 26 iii) *"A good scammer. A person who's like, acts like they're the victim, gets donations,*
27 *and then fucking rips everybody off. The public loves to watch that 'cause they're*
28 *like, what? What is this? What a jerk. Especially when they get caught finally. And so*
29 *she almost got caught in 2017. She got like nine felonies for theft of public services*
30 *and then she, she told this, this story to the government."* (Instagram livestream,
31 February 26, 2026)

32 **C. False Allegations of Intentional Exposure of Children to Lead**

- 33 i) *"She then, I think, set up the contractors 'cause she knew there was lead on her*
34 *house."* (Instagram livestream, February 18, 2026)
- 35 ii) *"And so I think that she should go to jail. So we'll work on that. I'll get back to this.*
36 *Um, anyway, let's see. Yeah, I think she did poison her kids..."* (Instagram livestream,
37 July 27, 2025)
- 38 iii) *"They tried to do a insurance job. Didn't work, you know. They failed. Their house*
39 *burned down. They didn't collect any money. Um, a few years later they tried the*

1
2 *same thing, I think, with, um, you know, their, their the lead paint thing.*” (Instagram
3 livestream, August 9, 2025)

4 16.

5 The statements described above are false, and Defendants made the statements despite
6 being in possession of documents and publicly available information that would require them to
7 make the statements with knowledge of their falsity or with reckless disregard for the truth.
8 Ritter’s own on-camera admissions demonstrate that he was aware of the exculpatory nature of
9 the evidence he possessed and chose to suppress, mischaracterize, and ignore that evidence in
10 furtherance of his campaign to destroy Plaintiffs’ reputation. The Ritter Defendants’ conduct
11 constitutes actual malice as a matter of law.

12 17.

13 Throughout the course of Defendants’ aforementioned defamatory smear campaign
14 against Plaintiffs, Defendants have on numerous occasions made statements showing that their
15 defamatory actions were intended to cause injury to Plaintiffs rather than for legitimate
16 competitive business purposes. By way of example only, the following statements by the Ritter
17 Defendants evidence malice toward Plaintiffs:

- 18 i) *“I think that she should go to jail, so we’ll work on that.”* (Instagram livestream, July
19 27, 2025)
20 ii) *“I completely fucking demolished her. It was so fun, so funny. I’m like, yeah, how
21 much did that run you?”* (Instagram livestream, July 31, 2025)
22 iii) *“Tamara, you’re an idiot. Your business shouldn’t exist. You should go to jail.”*
23 (Instagram livestream, September 18, 2025)

24 18.

25 In livestreams posted to Instagram on January 3, 2026 and January 16, 2026, Ritter read
aloud excerpts from State Farm Insurance investigation documents pertaining to the 2002 house

1
2 fire while screen sharing those documents with his viewers, establishing that the Ritter
3 Defendants possessed the relevant records. In those same livestreams, Ritter acknowledged the
4 reports' findings, stating: "No evidence of deliberate causation was found. It appears to be
5 accidental. That's the finding" and "No evidence of tampering with the electrical system was
6 found." The Ritter Defendants continued to publish and repeat insurance fraud allegations
7 against Ms. Rubin despite his own acknowledgment of these findings.

8
9 19.

10 The Ritter Defendants further acknowledged numerous times throughout 2025 and 2026
11 livestreams that the 2017 tax and charity fraud charges against Ms. Rubin were ultimately
12 dropped by the DOJ, which is publicly available information. Notwithstanding this
13 acknowledgment, the Ritter Defendants continued to publicly allege that Ms. Rubin committed
14 tax and charity fraud, demonstrating at minimum a reckless disregard for the truth.

15
16 20.

17 The Ritter Defendants, by their own livestream admissions, are also intimately familiar
18 with Ms. Rubin's documentary film "MisLEAD: America's Secret Epidemic" and the factual
19 evidence it contains. The facts and fact-based narrative presented in this publicly available film
20 allege that Ms. Rubin deliberately orchestrated her children's lead poisoning for financial gain
21 implausible to the point of impossibility. The Ritter Defendants' continued allegations of this
22 nature constitute reckless disregard for the truth, if not actual knowledge of falsity.

23
24 21.

25 On March 19, 2026, Plaintiffs sent Ritter a "Notice to Cease and Desist" letter (the "C&D
Letter") outlining the false and unlawful nature of Defendants' actions and providing him with
specific information about the falsity of his statements.

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The C&D Letter further demanded that Ritter: (1) cease and desist from making any further defamatory statements; (2) retract false statements from his social media and public facing platforms; (3) remove all defamatory content from anywhere that it appears; and (4) provide written assurance that he will not engage in any further defamatory or tortious conduct.

23.

Ritter responded to the C&D Letter on March 26, 2026 and indicated that he “want[ed] to be sure that I do not have anything considered defamatory by you or ms Rubin [*sic*] on my page.” Ritter then proceeded to remove select social media posts and post a retraction video but failed to otherwise comply with the terms of the C&D Letter despite clear instructions on which posts Plaintiffs required him to remove. Ritter’s partial compliance does not cure his liability for the harm already caused, nor does it discharge his ongoing obligations. As of the date of this filing, defamatory content about Plaintiffs remains publicly accessible on Defendants’ Instagram account and, upon information and belief, on Facebook, TikTok, Reddit, YouTube, and Defendants’ company websites. Each day that such content remains publicly accessible constitutes a continuing and independent act of defamation causing additional, quantifiable harm to Plaintiffs.

24.

As evidenced by the knowingly false statements made by the Ritter Defendants above, Defendants engaged in actions designed to intentionally and maliciously harm Plaintiffs’ professional reputation, economic relationships, and Plaintiff Rubin’s career and character.

25.

1
2 The Ritter Defendants' actions have resulted in significant damages to Plaintiffs in the
3 form of lost revenue and income, lost business opportunities, termination of contracts,
4 reputational harm, and ill-will. The Ritter Defendants have further caused damages through
5 unauthorized scraping, reproduction, and republication of Plaintiffs' copyrighted content and
6 intellectual property, including without limitation content originally published on
7 LeadSafeMama.com and TamaraRubin.com, without authorization or compensation. These
8 damages are ongoing and continue to accrue.

9 26.

10 As a direct and proximate cause of the Ritter Defendants' defamatory statements and
11 other malicious acts against Plaintiffs which resulted in termination of contracts and business
12 opportunities, Ms. Rubin has experienced harm in the form of impairment to her reputation and
13 standing in the community, personal humiliation, anxiety, sleeplessness, shame and disgrace.

14 27.

15 As a direct and proximate cause of the Ritter Defendants' actions alleged herein and
16 further similar actions, Plaintiffs have suffered actual economic damages in the form of lost
17 future business and economic opportunity, and lost goodwill.

18 28.

19 As a direct and proximate cause of the Ritter Defendants' actions alleged herein and
20 further similar actions, Plaintiffs have suffered non-economic damages in the form of severe
21 emotional distress, anxiety, humiliation, physiological and physical injury, and other emotional
22 harm damages.
23

24 **CLAIMS FOR RELIEF**

25 **FIRST CLAIM FOR RELIEF**

1
2 **(Defamation Per Se)**

3 29.

4 Plaintiffs reallege and incorporate by reference the paragraphs above.

5 30.

6 Defendants made false and defamatory statements to third parties about Plaintiffs. These
7 statements were designed to denigrate and prejudice Plaintiffs' personal and professional
8 reputations.

9 31.

10 As set forth above, Defendants falsely alleged that Plaintiff Rubin: (a) committed
11 insurance fraud in connection with the 2002 house fire at her home; (b) committed tax and
12 charity fraud, relying upon criminal charges that were fully investigated in 2017 and dropped by
13 the Oregon Department of Justice in 2018; and (c) intentionally exposed her own children to lead
14 poisoning for financial profit. Each of these allegations is false.

15 32.

16 Defendants' statements are defamatory per se because they falsely impute to Plaintiffs
17 conduct of a criminal, immoral, and dishonest nature both personally and in the conduct of their
18 business in the lead safety and consumer advocacy space. Specifically, Defendants' allegations
19 of insurance fraud, tax and charity fraud, and deliberate poisoning of children each constitute
20 categories of statement that are defamatory per se under Oregon law because they falsely charge
21 Plaintiffs with criminal conduct and impute to Plaintiffs a lack of integrity in their trade or
22 profession. As such, harm to Plaintiffs' reputation is presumed under Oregon law.

23 33.

1
2 Defendants published these false statements to third parties knowing them to be false and
3 malicious with the intent to defame Plaintiffs or with reckless disregard of their truth and falsity.
4 As set forth above, Defendants' own livestream admissions confirm that they possessed
5 exculpatory evidence directly contradicting their allegations and chose to continue publishing the
6 defamatory statements notwithstanding the knowledge of their falsity. Defendants' conduct was
7 willful, wanton, and undertaken with the specific purpose of causing maximum reputational and
8 economic harm to Plaintiffs, entitling Plaintiffs to an award of punitive damages in addition to
9 compensatory damages.

10 34.

11 As a direct and proximate cause of Defendants' defamation per se, Plaintiffs have
12 suffered actual economic damages in the form of lost business, injury to the organization's
13 image, lost goodwill and reputation, and lost prospective economic advantage in an amount of
14 \$942,000.00 or another amount to be proven at trial.

15 35.

16 As a direct and proximate cause of Defendants' actions, Ms. Rubin has suffered non-
17 economic damages in the form of emotional distress, anxiety, sleeplessness, humiliation,
18 physiological injury, and other emotional harm and damages associated with defamation in the
19 appropriate amount of \$2,000,000.00 or another amount to be proven at trial.

20
21 **SECOND CLAIM FOR RELIEF**

22 **(Defamation)**

23 36.

24 Plaintiffs reallege and incorporate by reference the paragraphs above.

25 37.

1
2 Defendants made false and defamatory statements to third parties about Plaintiffs. These
3 statements were designed to denigrate and prejudice Plaintiffs' personal and professional
4 reputations.

5 38.

6 As set forth above, Defendants falsely alleged that Plaintiff Rubin: (a) committed
7 insurance fraud in connection with the 2002 house fire at her home; (b) committed tax and
8 charity fraud, relying upon criminal charges that were fully investigated in 2017 and dropped by
9 the Oregon Department of Justice in 2018; and (c) intentionally exposed her own children to lead
10 poisoning for financial profit. Each of these allegations is false.

11
12 39.

13 Defendants' false statements subjected Plaintiffs to contempt and ridicule, tended to and
14 did in fact diminish the esteem, respect, goodwill or confidence in which Plaintiffs were held, or
15 otherwise imputed an unfitness and lack of integrity in Plaintiffs personal and professional
16 dealings. Defendants' false statements tended to and did in fact harm Plaintiffs in business and
17 profession.

18 40.

19 As a direct and proximate cause of Defendants' defamation, Plaintiffs have suffered
20 actual economic damages in the form of lost business, injury to the organization's image, lost
21 goodwill and reputation, and lost prospective economic advantage in an amount of \$942,000.00
22 or another amount to be proven at trial.

23 41.

24 As a direct and proximate cause of Defendants' actions, Ms. Rubin has suffered non-
25

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2 economic damages in the form of emotional distress, humiliation, physiological injury, and
3 other emotional harm and damages associated with defamation in the approximate amount of
4 \$2,000,000.00 or another amount to be proven at trial.

5
6 **THIRD CLAIM FOR RELIEF**
7 **(Intentional Interference with Economic Relations)**

8
9 42.

10 Plaintiffs reallege and incorporate by reference all paragraphs above.

11 43.

12 Plaintiffs had existing economic relationships, as well as prospective economic
13 advantages, stemming from their reputation, goodwill, and established business operations in the
14 lead safety and consumer advocacy space.

15 44.

16 Defendants were aware of Plaintiffs' existing economic relationships and prospective
17 economic advantages prior to Defendants' defamatory statements and tortious conduct.

18 45.

19 Defendants intentionally and improperly interfered with Plaintiffs' existing contractual
20 relationships and prospective economic advantages by defaming Plaintiffs in public forums in a
21 manner which was untruthful, sustained, and deliberately damaging to Plaintiffs' reputation and
22 business operations.

23 46.

1
2 Defendants' intentional interference was motivated by the purpose of inflicting injury on
3 Plaintiffs' reputation and existing and prospective economic relationships, and not by any
4 legitimate competitive interest.

5 47.

6 Defendants' intentional interference has harmed and continues to harm Plaintiffs'
7 reputation and existing and prospective economic relationships.

8 48.

9
10 As a direct and proximate cause of Defendants' intentional interference, Plaintiffs have
11 suffered actual economic damages in the form of lost business, injury to the organization's
12 image, lost goodwill and reputation, and lost prospective economic advantage in an amount of
13 \$942,000.00 or another amount to be proven at trial.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

- 16
17 1. That Judgment be entered against Defendants and in favor of Plaintiffs on their First
18 and Second Claims for Relief in the amount of \$2,942,000.00 or another amount to
19 be proven at trial, together with punitive damages in an amount to be determined by
20 the trier of fact.
- 21 2. That Judgment be entered against Defendants and in favor of Plaintiffs on their
22 Third Claim for Relief in the amount of \$942,000.00 or another amount to be
23 proven at trial.
- 24 4. That Plaintiffs recover their costs and disbursements, all bearing interest at 9% from
25 the date of judgment until paid;

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- 6. That this Court issue a permanent injunction requiring Defendants to (a) immediately remove all remaining defamatory content about Plaintiffs from all platforms; and (b) permanently cease and desist from making any further defamatory, false, or misleading statements about Plaintiffs.
- 7. That Plaintiffs recover prevailing party fees pursuant to ORS §20.190; and
- 8. That this Court grant Plaintiffs any other relief that it deems fair and proper.

DATED: May 7, 2026

JJH LAW, P.C.

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