

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF FLORIDA
Tampa Division**

CASE NO. _____

VALERIE FLYNN)	
)	
Plaintiff,)	
)	
v.)	
)	
CABLE NEWS NETWORK, INC.)	
)	
Defendant.)	
_____)	

**TRIAL BY JURY
IS DEMANDED**

COMPLAINT

Plaintiff, Valerie Flynn (“Plaintiff” or “Valerie”), by counsel, pursuant to Rule 3 of the Federal Rules of Civil Procedure, files the following Complaint against Defendant, Cable News Network, Inc. (“CNN”).

Plaintiff seeks (a) compensatory damages and punitive damages in the sum of **\$100,000,000.00**, (b) prejudgment interest on the principal sum awarded by the Jury from January 6, 2021 to the date of Judgment at the rate of 4.25 percent per year pursuant to Fla. Stat. § 55.03, and (c) court costs – arising out of the Defendant’s defamation and defamation by implication.

I. STATEMENT OF MATERIAL FACTS

1. According to the Federal Bureau of Investigation (“FBI”) and the Department of Homeland Security (“DHS”), “**QAnon**” is a “domestic violence extremist” (“DVE”) group and a “domestic terrorism threat”. The *Wall Street Journal*

concludes that QAnon is a “far right-wing, loosely organized network and community of believers who embrace a range of unsubstantiated beliefs. These views center on the idea that a cabal of Satan-worshipping pedophiles—mainly consisting of what they see as elitist Democrats, politicians, journalists, entertainment moguls and other institutional figures—have long controlled much of the so-called deep state government, which they say sought to undermine [President] Trump, mostly with aid of media and entertainment outlets.” On January 6, 2021, adherents of QAnon were among the “most prominent members of the mob” who stormed the United States Capitol in Washington, D.C. https://www.wsj.com/articles/what-is-qanon-what-we-know-about-the-conspiracy-theory-11597694801?mod=article_inline. CBS News’ *60 Minutes* recently represented that the violent “extremist ideology” of the QAnon “movement” has had a “corrosive impact” on the United States. [<https://www.cbsnews.com/news/qanon-conspiracy-united-states-60-minutes-2021-02-21/>].

2. In the wake of the January 6 storming of the Capitol, a chorus of left-wing media outlets began to spread false narratives about QAnon, including that Valerie’s brother-in-law, retired Lieutenant General Michael T. Flynn (“General Flynn”), was the “founder” of QAnon. On January 31, 2021, CNN aired a “Special Report” hosted by Anderson Cooper entitled, “*Inside the QAnon Conspiracy*”. CNN called QAnon a “deranged conspiracy cult”. CNN stated that some of “Q’s conspiracy claims” were “actually based on age-old racist and anti-Semitic beliefs”. CNN asserted that QAnon, like the Nazis, promoted “ancient and dark biases and bigotry in World history”. CNN stated that QAnon supporters were detached from “reality” and had an utter “disregard” for the facts. CNN alleged that QAnon followers were mentally ill and crazy. CNN

concluded that it was “abundantly clear” that QAnon was a “dangerous and violent movement” – a movement that has become “insurrectionist”.

3. On February 4, 2021, CNN published an “exclusive” report by correspondent Donie O’Sullivan (“O’Sullivan”), entitled “*CNN Goes Inside A Gathering Of QANON Followers*”. In the O’Sullivan report, CNN falsely accused Valerie of being a “follower” of the “dangerous”, “violent”, “racist”, “extremist”, “insurrectionist”, “domestic terrorism” movement – **QAnon**. The O’Sullivan report juxtaposed a picture of Valerie (and other members of the Flynn family) with numerous known QAnon adherents. The report included footage of the insurrectionist mob storming the United States Capitol on January 6, 2021. The O’Sullivan report also included a clip – selectively edited and altered by CNN – of a video posted to Twitter by General Michael Flynn on July 4, 2020. CNN emblazoned the edited clip with a chyron that endorsed the defamatory meaning of CNN’s statements:



The video was taken during a Fourth of July barbecue at Valerie’s sister-in-law’s home in Newport County, Rhode Island. In the original video, each member of the Flynn family,

including Valerie, individually took an oath to the United States Constitution, the same oath taken by Members of Congress. After finishing the oath to the United States Constitution, General Flynn stated, “where we go one, we go all”.¹ Each family member repeated the phrase, as they had repeated each line of the oath to the U.S. Constitution. The entire family then exclaimed, “God Bless America”. In the altered clip used in the O’Sullivan report, CNN intentionally edited out the oath to the United States Constitution *and* omitted the words “God Bless America”, fraudulently making it appear and insinuating that Valerie pledged an oath of allegiance to QAnon. By its editing and production of the O’Sullivan report, CNN intended and endorsed the defamatory meaning.

4. Although it knew nothing about Valerie, CNN consciously chose to include Valerie in the edited clip. The clip conveyed a very powerful (but untrue) message: that Valerie pledged her allegiance to QAnon. CNN made no effort in the O’Sullivan report to dispel that notion. The edited video clip festooned with the chyron

¹ According to some, the phrase “where we go one, we go all” was first engraved on a bell on one of President John F. Kennedy’s sailboats, acknowledging the unity of mankind. In his video published on July 4, 2020, General Flynn intended to encourage people to think about being good citizens, to love country and be good patriots. The video had nothing to do with QAnon or recruiting “digital soldiers” for an apocalyptic reckoning. [<https://www.washingtonexaminer.com/news/michael-flynn-recites-oath-of-office-using-slogan-associated-with-qanon>]. Others say that the phrase “where we go one, we go all” is inscribed on the bell of the 1911 brigantine rigged sailing ship *Eye of the Wind*. [https://www.eyeofthewind.net/en/gallery-ship?os_image_id-335]. *Eye of the Wind* was used in the Ridley Scott-directed film *White Squall* (1996), where the ship was called *Albatross*. Captain Christopher Sheldon (played by actor Jeff Bridges) says in the film, “If we don’t have order, we have nothing. Where we go one, we go all.” Still others say that the phrase “where we go one, we go all” is similar to the Latin “*Unus pro omnibus, omnes pro uno*”, made famous in the Alexandre Dumas novel *The Three Musketeers* (1844) as “All for one, and one for all.” Valerie’s repetition of the phrase at the July 4, 2020 barbecue did not signify any kind of support for QAnon. It was not an oath of allegiance to QAnon, or any kind of oath at all. It was a simple, family, July 4 statement of support for each other.

“QAnon followers” was a premeditated attempt (a) to manufacture a connection between Valerie and QAnon that did not exist and an event (a pledge of allegiance) that never happened, (b) to wildly exaggerate and misrepresent Valerie’s actions and beliefs, and (c) to create a frenzy about the Flynn family’s involvement with a violent, extremist group, QAnon. The O’Sullivan report intentionally misrepresented and actively sought to conceal what oath Valerie was actually taking.

5. In addition to millions of cable TV viewers in Florida, CNN republished the O’Sullivan “exclusive” to millions of social media followers (Twitter) and subscribers (YouTube) in Florida:



The image is a screenshot of a Twitter post from the account CNN Newsroom (@CNNnewsroom). The post includes a video thumbnail with the following details:

- Profile:** CNN Newsroom (@CNNnewsroom) with a verified checkmark.
- Text:** "CNN goes inside a gathering of QAnon followers." followed by the URL cnn.it/3aBLTvg.
- Video Thumbnail:** A group of seven people standing outdoors at dusk, raising their hands in a gesture. They are wearing various shirts, including one that says "I SUPPO GENERA FLYN" and another that says "USA". A red banner at the bottom of the video reads "EXCLUSIVE CNN GOES INSIDE A GATHERING OF QANON FOLLOWERS".
- Video Info:** 1.8K views, 1:25 / 5:09 duration, and a play button icon.
- Metadata:** 4:20 PM · Feb 5, 2021 · SnapStream TV Search

[\[https://mobile.twitter.com/CNNnewsroom/status/1357801350768308224;](https://mobile.twitter.com/CNNnewsroom/status/1357801350768308224)
[https://www.youtube.com/watch?v=65q8J3Q8MIU\]](https://www.youtube.com/watch?v=65q8J3Q8MIU).

6. Valerie is not a follower² of any violent, extremist or terrorist groups, including **QAnon**. CNN's false statements subjected Valerie to hatred, distrust, ridicule, contempt and disgrace. [See, e.g., *Flynn v. CNN*, 2021 WL 5964129, at * 4 (S.D.N.Y. Dec. 16, 2021) ("Because the Court accepts the Flynn's allegation that they are not QAnon followers as true, the Flynn's have plausibly alleged that CNN's statement was false. Consequently, the Flynn's have also plausibly alleged that CNN's statement was defamatory. See R&R at 33 ("[F]alsely implying a connection to a violent extremist group can be defamatory.")].

7. CNN falsely attributed to Valerie associations that never existed, actions she never took, including an oath of allegiance or pledge to **QAnon**, and views Valerie never held. Published in the immediate aftermath of the storming of the U.S. Capitol, CNN's false attributions exposed Valerie to public scorn, ridicule and contempt, and lowered her esteem in the community, causing insult, embarrassment, humiliation and substantial injury to her reputation. The edited video clip of Valerie, with the chyron CNN chose to run underneath, confirmed for CNN's viewers that Valerie was indeed one of the despised "QAnon followers" who were the subject of the O'Sullivan report and who were "prominent members of the mob" who stormed the Capitol.

² Merriam-Webster defines "follower" as (1) "one in the service of another"; (2) "one that follows the opinions and teachings of another"; (3) "one that imitates another"; (4) fan or devotee; (5) "one who subscribes to a feed especially on social media." [<https://www.merriam-webster.com/dictionary/follower>]. Synonyms for "follower" include "acolyte", "adherent", "convert" and "disciple". Valerie fits ***none*** of the dictionary definitions of "follower".

8. In this case, Valerie seeks presumed damages, actual damages and punitive damages as a result of CNN's false statements and defamatory implications.

II. PARTIES

9. Valerie is a citizen of Florida. She lives in Sarasota County. She is a private individual. Until she was egregiously defamed by CNN, Valerie enjoyed an untarnished reputation in the community.

10. Defendant, CNN, is a Delaware corporation, based and operating in Georgia. CNN is a division of WarnerMedia. WarnerMedia was an operating segment of AT&T, Inc., until it was recently spun-off and sold to Discovery, Inc. CNN is part of WarnerMedia's "Turner" business unit. The Turner business unit operates television networks and related properties that offer branded news and other content for consumers in Florida and around the world. Millions in Florida watch CNN. Turner's digital properties include the CNN digital network, www.cnn.com. In addition to its massive digital footprint, CNN employs multiple social media accounts as a means to profit from the publication of its false statements. The O'Sullivan report and social media posts at issue in this case, identified above, were published to and read by millions in Florida, where Valerie suffered substantial damage to her reputation. *See, e.g., Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770, 776 (1984) ("[f]alse statements of fact harm both the subject of the falsehood **and** the readers of the statement ... The tort of libel is generally held to occur wherever the offending material is circulated. Restatement (Second) of Torts § 577A, Comment a (1977). The reputation of the libel victim may suffer harm even in a state in which he has hitherto been anonymous. The communication of the libel

may create a negative reputation among the residents of a jurisdiction where the plaintiff's previous reputation was, however small, at least unblemished.”).

III. JURISDICTION AND VENUE

11. The United States District Court for the Middle District of Florida has subject matter jurisdiction over this action pursuant to Title 28 U.S.C. § 1332 (Diversity). The parties are citizens of different States and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

12. CNN is at home in Florida, and is subject to the Court's general and specific personal jurisdiction.

13. Venue is proper pursuant to 28 U.S.C. §§ 1391(b)(1) and 1391(b)(2). The defamation which is the basis of this lawsuit was committed in the Middle District of Florida in addition to all over the world. Over 10 million people—more than 55 percent of the State's population—reside within the Middle District, thus making the alleged defamatory statements in this venue highly significant. Plaintiff is a resident of Sarasota County, and is domiciled in the Middle District of Florida. CNN conducts substantial business in the Middle District, is registered in Florida as a foreign corporation, maintains a registered agent in Plantation, Florida, operates a bureau in Miami, Florida, and has hundreds of agents in Florida who engage in daily business for CNN.

COUNT I – DEFAMATION *PER SE*

14. Plaintiff restates paragraphs 1 through 13 of this Complaint, and incorporates them herein by reference.

15. On February 26, 2021, CNN doubled-down on its opposition research about QAnon, publishing talking points intended to injure the reputations of anyone

associated with QAnon. In yet another “Special Report” hosted by Anderson Cooper, CNN reiterated that QAnon was a “cult”. Cooper repeated that QAnon espoused ideas that were based on “anti-Semitic, anti-Catholic tropes that have been used [by] ... the Nazis”. Cooper emphasized that “[t]rusting the plan was an important part of QAnon belief”. Cooper drew analogies between QAnon and the “terror group ISIS”. [<http://transcripts.cnn.com/TRANSCRIPTS/2102/26/csr.01.html>].

16. CNN made, published and republished false factual statements of or concerning Valerie. Using Valerie’s image, an edited video clip and a flashy chyron, CNN falsely stated or implied and insinuated that Valerie was an acolyte, adherent, convert and disciple of QAnon – a “**QAnon follower**” – or was linked to and involved in or with the violent extremist group, **QAnon**. CNN manufactured a relationship and connection between Valerie and QAnon that never existed.

17. CNN published the false statements without privilege of any kind.

18. CNN’s statements are materially false. Valerie is not and never has been a follower of the QAnon terrorist/extremist group. Valerie never took or pledged an oath of allegiance to QAnon. There is a material difference between CNN’s false statements and the truth. CNN falsely attributed to Valerie an affiliation/association, beliefs and views that Valerie has never had.³ *See Masson v. New Yorker Magazine, Inc.*, 501 U.S. 496, 510-511 (1991) (“False attribution of statements to a person may constitute libel, if

³ CNN might as well have accused Valerie of being a follower of ISIS, the Proud Boys, the Ku Klux Klan, or the Nazis. *See Boulger v. Woods*, 917 F.3d 471, 483 (6th Cir. 2019) (the tweet at issue was reasonably susceptible to a defamatory meaning—that “Woods was asserting Boulger was the woman giving the Nazi salute”); *Liberty Lobby, Inc. v. Anderson*, 1991 WL 186998, at * 9 (D. D.C. 1991) (“The Court finds that the implication that Carto emulates Hitler in appearance or action is defamatory and that the record could support a reasonable jury finding that the defendants published these allegations with actual malice”).

the falsity exposes that person to ... [hatred, contempt, ridicule, or obloquy, or ... causes him to be shunned or avoided, or ... has a tendency to injure him in his occupation]... A fabricated quotation may injure reputation in at least two senses, either giving rise to a conceivable claim of defamation. First, the quotation might injure because it attributes an untrue factual assertion to the speaker ... Second, regardless of the truth or falsity of the factual matters asserted within the quoted statement, the attribution may result in injury to reputation because the manner of expression or even the fact that the statement was made indicates a negative personal trait or an attitude the speaker does not hold.”). The truth would have had a different effect on the minds of viewers and readers from that which CNN’s false statements produced. *See Murphy v. Boston Globe, Inc.*, 449 Mass. 42, 865 N.E.2d 746, 758 (Mass. 2007) (“The jury were warranted in finding that the portion of the story quoting the plaintiff as saying, ‘She is [fourteen]. She got raped. Tell her to get over it,’ would lead one to believe the judge was indifferent, and even callous, to crime victims who appeared before him, and especially demeaning to the rape victim. The difference between the statement attributed to the plaintiff in the Herald articles, and the statement that Crowley testified he told Wedge the plaintiff had made, cannot, as matter of law, be characterized as a minor discrepancy”).

19. CNN’s statements are defamatory. *See, e.g., Flynn*, 2021 WL 5964129 at * 4 (finding that CNN’s statements during the O’Sullivan report are defamatory); *see also Zimmerman v. Buttigieg*, 521 F.Supp.3d 1197, 1214 (M.D. Fla. 2021) (a statement that attributes racist and white supremacist attributes to someone could subject that person to hatred, distrust, ridicule, contempt or disgrace); *Sirer v. Aksoy*, 2021 WL 4952610, at * 4 (S.D. Fla. 2021) (“in the Complaint, Plaintiff alleges that Defendant posted a video on his

YouTube channel accusing Plaintiff of being a member of an organization designated as a terrorist organization ... which he later reposted to Twitter. Plaintiff alleges further that Defendant made the remarks as part of a scheme to depress the price of AVAX in favor of the crypto-assets he promotes. Plaintiff alleges that his reputation has been harmed by Defendant's statements, and that they pose a threat to Plaintiff's and his family's safety. Plaintiff need not allege more.") (citation omitted).

20. CNN's false statements constitute defamation *per se*. The statements tend to subject Valerie to hatred, distrust, ridicule, contempt, or disgrace. *Alan v. Wells Fargo Bank, N.A.*, 604 Fed.App'x 863, 865 (11th Cir. 2015); *Wolfson v. Kirk*, 273 So.2d 774, 777 (Fla. Dist. Ct. App. 1973) ("The significance of the classification of a communication as actionable *per se* lies in the fact that its victim need not plead or prove malice (except where a privilege is involved) or special damage because malice and the occurrence [sic] of damage are both presumed from the nature of the defamation."). CNN's statements link Valerie to the insurrectionist mob who stormed the Capitol. CNN's statements caused Valerie to hesitate using her last name in public and to question her personal safety from persons determined to expose "QAnon". CNN's false statements are neither fair nor accurate.⁴

21. By broadcasting the false statements on cable television, publishing the statements on the Internet *and* republishing via social media, CNN knew or should have known that the false statements would be republished over and over by third-parties to

⁴ The defamatory nature of CNN's false statements associating Valerie with QAnon is evidenced by the wholesale condemnation of QAnon in House Resolution 1094, passed on October 2, 2020. [<https://www.congress.gov/116/bills/hres/1094/BILLS-116hres1094ih.pdf>].

Valerie's detriment. Republication by CNN's followers, subscribers, readers, other media outlets, and by users of Twitter was the natural and probable consequence of CNN's actions and was actually and/or presumptively authorized by CNN. In addition to its original publications, CNN is liable for the republications of the false and defamatory statements by third-parties under the republication rule.

22. CNN's false and defamatory statements jeopardized Valerie's safety and harmed her reputation,⁵ causing presumed damages, actual injury and pecuniary loss.

23. CNN lacked reasonable grounds for a belief in the truth of its statements, and acted negligently in failing to determine the true facts. CNN failed to contact Valerie prior to publication and had no independent evidence to corroborate that Valerie was a follower of any violent, extremist group, including QAnon, because no such evidence exists.

24. CNN published the false and defamatory statements with actual malice:

a. CNN knew its statements about Valerie were false. CNN knew that it had no factual basis to accuse Valerie of being a QAnon follower. In spite of its actual knowledge, CNN misrepresented that Valerie followed QAnon and pledged allegiance to this extremist group. CNN fabricated the statements. They were a product of CNN's imagination and desire to hurt General Michael Flynn.

b. At a time when it was heavily promoting a narrative about violent DVE QAnon, CNN deliberately altered the video posted by General Flynn to his Twitter

⁵ Valerie is not the only one to be harmed by the mere association with QAnon. In 2021, *Politico* published an account of the ordeal of Ezra Cohen-Watnick. <https://www.politico.com/news/2021/01/19/qanon-trump-ezra-cohen-watnick-460520> ("Cohen described being caught in a kind of ideological tag team as early speculation by right-wing QAnon followers that he was Q evolved into left-wing obsession with proving that he was the fraudster behind the postings").

account in order to associate Valerie and other members of the Flynn family with the QAnon domestic terrorists and extremists, and, thereby, intentionally convey a defamatory meaning as to Valerie. The edits were deliberate and were made by editors and producers who were following a preconceived narrative (crafted by former CNN President Jeff Zucker) to link the Flynn family members to the violent extremist group QAnon that was responsible for the events of January 6, 2021. This was not the first time CNN peddled falsehoods to injure someone and destroy their reputation. They did it during the 2020 Presidential election. [<https://nypost.com/2021/04/13/cnns-charlie-chester-says-network-peddled-anti-trump-propaganda/>]. The O'Sullivan report was part of a premeditated effort by CNN to injure Valerie.

c. In the wake of the storming of the United States Capitol, CNN's statements were intentionally extreme and outrageous. CNN knew that publication of the statements would cause a media frenzy. CNN deliberately and recklessly conveyed a false narrative about Valerie to sensationalize the news. *Tomblin v. WCHS-TV8*, 2011 WL 1789770, at * 5 (4th Cir. 2011) (unpublished) ("on the question of whether WCHS-TV8 deliberately or recklessly conveyed a false message to sensationalize the news and thus to provide factual support for a finding of malice, there are disputed facts"). Knowing that its statements about Valerie were sensationally false, CNN intentionally published the false statements in order to increase ratings, viewership and profits. CNN's decision to promote a baseless narrative about the Flynns was part of a deliberate corporate policy and regular way of doing business that emanated from Zucker. CNN acted willfully and wantonly and with actual malice by pursuing a course of action that it knew was likely to result in harm to Valerie.

d. CNN is a Democratic Party trumpet. CNN recruits, hires and promotes journalists who share its extreme ideology and political viewpoints. CNN harbors an institutional animosity, hostility, hatred, extreme bias, spite and ill-will towards the Flynn family, and, in particular, General Flynn. This animosity, bias, prejudice and desire to harm motivated CNN to publish the intentionally false statements and insinuations about Valerie at issue in this case. CNN intended to inflict harm through knowing or reckless falsehoods. CNN published the false statements as part of a broad, pretextual, premeditated and ongoing disinformation campaign against General Flynn orchestrated by political operatives and agents of the Democratic Party for whom CNN acts as a surrogate and bullhorn. The purpose of CNN's effort to link Valerie and her family to violent extremists is to impair or abrogate General Flynn's ability to have any impact on the political environment in the United States given General Flynn's stature. In furtherance of the scheme, CNN uses its broadcast and publishing empire, political influence and international reach to attack General Flynn and his family at each opportunity, and to sow seeds of distrust in the minds of the voting public about General Flynn by publishing false narratives and talking points provided by Democratic operatives. Valerie was and is collateral damage in CNN's defamation scheme.

e. CNN abandoned all journalistic standards and integrity, including CNN's own standards and code of ethics, in writing, editing, and publishing the false narrative. CNN did not seek the truth or report it. It betrayed the truth to sensationalize the news for self-glory, profit and politics. Rather than minimize harm to Valerie, CNN set out to inflict maximum pain and suffering on Valerie in order to harm Valerie's reputation and belittle and besmirch General Flynn. CNN never once considered the

long-term implications or the extended reach and permanence of the false accusation that Valerie was affiliated with a domestic violence extremist group. CNN did not care. It intended to hurt Valerie.

f. Upon information and belief, CNN and O’Sullivan have deleted or discarded their notes and other documents that laid out the plan to smear the Flynn family in a deliberate effort to conceal the fact that they knew there were inaccuracies in the reporting. This inference, in turn, provides a strong basis for a finding of actual malice.

g. CNN reiterated, repeated and excessively caused the publication and republication of the false and defamatory statements and imputations out of a desire to hurt Valerie and to permanently stigmatize her.

25. As a direct result of CNN’s defamation, Valerie suffered presumed damages and actual injury, including, but not limited to, insult, pain, embarrassment, humiliation, emotional suffering, injury to her reputation, lost future earnings and diminished earning capacity, costs and other out-of-pocket expenses, in the sum of \$25,000,000.00 or such greater amount as is determined by the Jury.

COUNT II – DEFAMATION BY IMPLICATION

26. Plaintiff restates paragraphs 1 through 13 of this Complaint, and incorporates them herein by reference.

27. The strong defamatory gist and false implication from the O’Sullivan report is that Valerie is a follower of a violent, extremist group responsible, *inter alia*, for the events on January 6, 2021. The O’Sullivan report implies that Valerie harbors the same beliefs, views and inclinations as all other QAnon adherents featured in the report,

including two QAnon followers arrested and prosecuted for storming the Capitol on January 6, 2021.

28. CNN carefully chose its words and purposefully misrepresented facts. In the O’Sullivan report, CNN juxtaposed a series of facts so as to imply a defamatory connection between them. However, there is no connection between Valerie and QAnon. In addition, CNN selectively edited General Flynn’s video and omitted facts in a way that intentionally conveyed a preconceived false meaning and implication – that Valerie pledged her allegiance to **QAnon**.

29. CNN’s statements and actions constitute defamation by implication.

30. As a direct result of CNN’s defamation by implication, Valerie suffered presumed damages and actual injury, including, but not limited to, insult, pain, embarrassment, humiliation, emotional suffering, injury to her reputation, lost future earnings and diminished earning capacity, costs and other out-of-pocket expenses, in the sum of \$25,000,000.00 or such greater amount as is determined by the Jury.

31. CNN published the false statements intentionally, deliberately and with actual malice. For the reasons stated in paragraph 24 above, CNN is liable to Valerie for punitive damages.

Valerie alleges the foregoing based upon personal knowledge, public statements of others, and records in her possession. Valerie believes that substantial additional evidentiary support, which is in the exclusive possession of CNN, Zucker, Cooper, O’Sullivan, their agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Valerie reserves her right to amend this Complaint upon discovery of additional instances of CNN's wrongdoing.

CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, Plaintiff Valerie Flynn respectfully request the Court to enter Judgment against CNN as follows:

- A. Compensatory damages in the sum of \$25,000,000.00;
- B. Punitive damages in the amount of \$75,000,000.00;
- C. Prejudgment interest on the principal sum awarded by the Jury at the maximum rate allowed by law from January 6, 2021 until Judgment is entered;
- D. Postjudgment interest;
- E. Such other relief as is just and proper.

TRIAL BY JURY IS DEMANDED

DATED: February 9, 2022

Signature of Counsel on Next Page

VALERIE FLYNN

By: /s/ Jason R. Kobal

Jason R. Kobal, Esquire
KOBAL LAW, P.A.
12169 W. Lindebaugh Ave.
Tampa, FL 33626
(813) 873-2440
koballaw@yahoo.com
Florida Bar No.: 0542253

Counsel for the Plaintiffs

Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiffs
(Application for Admission Pro Hac Vice
To be Filed)