UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONALD J. TRUMP FOR PRESIDENT, INC.,	)))	CIVIL ACTION FILE NO.
Plaintiff,	)))	**COMPLAINT**
v.	)))	**JURY TRIAL DEMANDED**
CNN BROADCASTING, INC.; CNN PRODUCTIONS, INC.; and CNN INTERACTIVE GROUP, INC.,	)))))	
Defendants.	))))	

COMPLAINT

Plaintiff Donald J. Trump for President, Inc. (the "Campaign"), by and through its undersigned attorneys, alleges as follows:

INTRODUCTION AND SUMMARY OF CASE

1.

Defendants CNN Broadcasting, Inc., CNN Productions, Inc. and CNN Interactive Group, Inc. (collectively, "CNN") published false and defamatory statements of and concerning the Campaign, claiming that it "assessed the potential risks and benefits of again seeking Russia's help in 2020 and has decided to leave that option on the table."

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2.

At the time of publication, CNN was well aware that these statements were not true, because there was an extensive record of statements from the Campaign and the administration expressly disavowing any intention to seek Russian assistance. There have been no statements by the Campaign that either constitute or imply an intention by the Campaign to seek or consider seeking Russian assistance in the 2020 election, or to "leave that option on the table."

3.

The Campaign, through counsel, sent a written demand to CNN on February 25, 2020, to retract and apologize for the aforementioned false and defamatory statements. CNN refused. The Campaign therefore was left with no alternative but to file this lawsuit to: publicly establish the truth, properly inform CNN's readers and audience (and the rest of the world) of the true facts, and seek appropriate remedies for the harm caused by CNN's false reporting and failure to retract and apologize for it.

4.

CNN has engaged in a systematic pattern of bias against the Campaign, designed to maliciously interfere with and damage its reputation and ultimately cause the organization to fail.

THE PARTIES

5.

Plaintiff Donald J. Trump for President, Inc. is a Virginia corporation with its principal place of business in New York, New York. The Campaign operated the presidential election campaign of Donald J. Trump commencing in 2015, and has operated his reelection campaign since the President's election.

6.

On information and belief, defendant CNN Broadcasting, Inc. is a Georgia corporation with its principal place of business in Atlanta, Georgia.

7.

On information and belief, defendant CNN Productions, Inc. is a Georgia corporation with its principal place of business in Atlanta, Georgia.

8.

On information and belief, defendant CNN Interactive Group, Inc. is a Delaware corporation with its principal place of business in Atlanta, Georgia.

9.

On information and belief, defendants CNN Broadcasting, Inc., CNN Productions, Inc. and CNN Interactive Group, Inc. own and operate the CNN cable television network and the www.CNN.com website.

JURISDICTION AND VENUE

10.

This Court has subject matter jurisdiction over this action under 28 U.S.C. § 1332(a)(1), because the Campaign resides in the State of New York, and CNN resides in the States of Georgia and Delaware. Additionally, the amount in controversy is in the millions of dollars, which exceeds the statutory minimum of $75,000.

11.

Venue is proper in this District under 28 U.S.C. §§ 1391(b)(1) & (b)(2), because CNN is located in this District and published the defamatory statements alleged herein within this District.

STATEMENT OF FACTS

12.

On or about June 13, 2019, CNN published an article on the www.CNN.com website entitled "Soliciting dirt on your opponents from a foreign government is a crime. Mueller should have charged Trump campaign officials with it" by Larry Noble (the "Defamatory Article"). The Defamatory Article claims, among other things, that the Campaign "assessed the potential risks and benefits of again seeking Russia's help in 2020 and has decided to leave that option on the table."

The Defamatory Article does not cite to any facts or reasoning in support of this claim.

<center>13.</center>

The Defamatory Article is false. In fact, the Campaign has repeatedly and openly disclaimed any intention to seek Russian involvement in the 2020 election. The examples of this are too numerous to fully enumerate, but examples include: (a) then-Press Secretary Sarah Sanders stated on August 2, 2018 that "[s]ince the beginning of his administration, President Trump has implemented a whole-of-government approach to safeguard our nation's elections. The President has made it clear that his administration will not tolerate foreign interference in our elections from any nation-state or other dangerous actor"; (b) on September 12, 2018, while signing an executive order imposing sanctions on foreign countries who interfere in United States elections, the White House issued a statement that "the United States will not tolerate any form of foreign meddling in our elections"; and (c) on May 13, 2019, the White House stated it would not use any information hacked or stolen by foreign adversaries in the 2020 election.

<center>14.</center>

There have been no public statements made by the Campaign with respect to the 2020 election that can be reasonably interpreted as "seeking Russia's help" or "leav[ing] that option on the table."

15.

The statement that the Campaign has "decided to leave th[e] option on the table" of seeking Russian assistance was made up out of whole cloth. Despite extensive reporting on the Campaign and its strategies, including by CNN, there have been **no reports** of any assessment by the Campaign to potentially seek Russian assistance in connection with the 2020 election, nor any reports about any decision of the Campaign to "leave that option on the table." Rather, both statements by CNN are outright false, and fabricated.

16.

It is not entirely surprising that CNN would publish such blatantly false statements about the Campaign. There is extensive evidence that CNN and its writer, Larry Noble, are extremely biased against the Campaign. This evidence includes, among other things, undercover video footage taken by the Project Veritas news organization in which CNN staff members admit on camera that CNN's coverage is extremely biased against the Campaign, the administration, and Republicans in general.

17.

In the Project Veritas footage, Nick Neville, a Media Coordinator at CNN, admits that CNN's chief executive, Jeff Zucker, has a personal vendetta against the President.

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18.

John Bonifield, a Supervising Producer at CNN, states in the Project Veritas footage that CNN's coverage regarding Russia's alleged interference with the 2016 election was "mostly bullshit" and that the President "is probably right to say…you are witch hunting me."

19.

Christian Sierra, a Media Coordinator at CNN, states in the Project Veritas footage that Mr. Zucker wanted impeachment to be the top story **every day**, that "everyone at the network" complains about the amount of such coverage, and that CNN's "Democratic interviews are like softballs, compared to the Republicans."

20.

Cary Poarch, a CNN employee in the Washington, D.C. bureau, states in the Project Veritas footage that CNN "purports to be facts first, and that's clearly not the case."

21.

The news stories at www.CNN.com follow the same extremely biased news perspective.   According to a recent, reliable survey, 93% of all stories at www.CNN.com were aggressively negative about the current President, whereas coverage of past Presidents was only around 50% negative.

22.

Larry Noble, the author of the Defamatory Article, has a record of malice and bias against the President as well. On February 14, 2020, Mr. Noble tweeted: "Trump cheats and lies, and when caught, lies again and claims the right to make the rules. He claims defeats as victories, takes credit for anyone's success and blames his failures on others. And the Republicans have told him they are fine with that, so he's just getting started." Mr. Noble has written numerous articles accusing the President of criminal activity, and of campaign finance and ethics violations, and has lodged a complaint against a Super-PAC which supports the President.

23.

CNN clearly had a malicious motive in publishing the Defamatory Article, and acted with reckless disregard for the truth. Extensive public information, known by and available to CNN, confirms that the Campaign has not sought Russian help in the 2020 election and has made no statements about seeking any such help. On information and belief, CNN engaged in extensive reporting on the Campaign and its strategies, and was aware at the time of publication of the Defamatory Article that the Campaign had **not** decided to "leave th[e] option on the table" of seeking Russia's help in the 2020 election. CNN knowingly disregarded all such information when it published the Defamatory Article.

24.

CNN never informed the Campaign that it was going to publish the claims in the Defamatory Article, did not afford the Campaign an opportunity to verify the accuracy of the claims before publication, and did not reach out to the Campaign for comment.

25.

The Defamatory Article defamed the Campaign in its trade or profession, because it falsely accuses the Campaign of considering a strategy of disloyal, unethical and potentially unlawful conduct: seeking the assistance of a foreign adversary of the United States to improperly influence an election result.

26.

The Defamatory Article has forced, and will continue to force, the Campaign to expend funds on corrective advertisements and to otherwise publicize the fact that the Campaign is not seeking Russia's help, nor leaving that "option on the table," in the 2020 election campaign. The Campaign was damaged in an amount to be proven at trial, in the millions of dollars.

FIRST CAUSE OF ACTION

(Libel)

27.

The Campaign realleges and incorporates by this reference Paragraphs 1 through 26 as though fully set forth herein.

28.

CNN published the Defamatory Article on or about June 13, 2019.

29.

The Defamatory Article contains false statements of fact.

30.

The false statements in the Defamatory Article are of and concerning the Campaign in that they allege the Campaign is actively considering seeking Russia's assistance in the 2020 election campaign.

31.

The Campaign is concededly a public figure, and the false statements were made with actual malice, as alleged herein.

32.

The false statements defamed the Campaign in its trade or profession.

33.

The false statements caused actual damage to the Campaign, the full amount of which will be proven at trial, but is in the millions of dollars.

34.

CNN's actions show willful misconduct, malice, fraud, wantonness, oppression and that entire want of care which raises a presumption of conscious indifference to the consequences, and accordingly the Campaign is entitled to an award of punitive damages against CNN.

DEMAND FOR JURY TRIAL

The Campaign hereby demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, the Campaign prays for relief as follows:

i.   Compensatory damages in the millions of dollars, according to proof;

ii.   Presumed damages according to proof;

iii. Punitive damages according to proof;

iv.   Costs of suit; and

v.   Such other and further relief as the Court may deem just and proper.

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Dated: March 6, 2020

Respectfully submitted,

DONALD J. TRUMP FOR PRESIDENT, INC.

By: /s/ J. David Hopkins

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CERTIFICATE OF TYPE SIZE AND STYLE

Counsel certifies that the size and style of type used in the foregoing

document is Times New Roman 14 point.

/s/ J. David Hopkins
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