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JUDGE SCARFIELD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Civil Action No. **17 CV 6990**

CARTER PAGE,
Plaintiff,

-v-

OATH INC., AND BROADCASTING
BOARD OF GOVERNORS,
Defendants.

JURY TRIAL DEMANDED

FILED
U.S. DISTRICT COURT
2017 SEP 14 AM 11:52
S.D. OF N.Y.

COMPLAINT FOR DAMAGES

Plaintiff, Carter Page (“Dr. Page”), for his Complaint against Defendants Oath Inc. (“Oath”) and the Broadcasting Board of Governors (“BBG”) alleges the following:

INTRODUCTORY STATEMENT

1. Dr. Page brings this action to hold Oath and BBG, (together, the “Defendants”), accountable for defaming him by publishing through their subsidiaries and BBG’s grantee Radio Free Europe/Radio Liberty (“RFE”) an extensive series of statements about him that they knew to be false. Specifically, between approximately June 2016 through at least July 2017, prominent Oath news subsidiaries Yahoo Inc. (“Yahoo”) and THEHUFFINGTONPOST.COM, INC. brand HuffPost (“HuffPost”), and BBG’s grantee RFE each published highly damaging, life-threatening articles regarding Dr. Page.

2. On September 23, 2016, in perhaps the most dangerous, reckless, irresponsible and historically-instrumental moments in modern-day sensational crime story journalism, the Yahoo News department of Defendant Oath’s subsidiary Yahoo chose to publish a highly misleading article filled with false allegations, entitled: “U.S. intel officials probe ties between Trump adviser and Kremlin”¹ (the “2016 Yahoo Report”, attached as **Exhibit 1**). The article included an extensive array of completely false, misrepresented and/or unverified information compiled by Orbis Business Intelligence Ltd., a private company in London, U.K. (“Orbis”), which made various allegations concerning, among other things, meetings between Dr. Page and two sanctioned Russian officials. In each instance, Dr. Page has never met with either of these individuals at any point in his life, Rosneft Oil Company (“Rosneft”) Chief Executive Officer (“CEO”) Mr. Igor Sechin (“Mr. Sechin”) and Mr. Igor Diveykin (“Mr. Diveykin”).

¹ Michael Isikoff, “U.S. intel officials probe ties between Trump adviser and Kremlin,” Yahoo News, September 23, 2016. [<https://www.yahoo.com/news/u-s-intel-officials-probe-ties-between-trump-adviser-and-kremlin-175046002.html>]

3. At 03:55 GMT on September 24, 2016, Defendant BBG's grantee RFE republished Yahoo's false allegations that Dr. Page met with Mr. Sechin and Mr. Diveykin. Falling under the oversight of its financial sponsor BBG, RFE directly tied Dr. Page to dominant public controversies regarding alleged cybercrimes that Dr. Page never played any role in: "The Yahoo News report was published a day after leading Democrats on the congressional intelligence committees accused Russia of trying to influence the U.S. election via computer hacking and called on Putin to 'order a halt to this activity.'"² (the "RFE Republication", attached as **Exhibit 2**)

4. Just days before the election on November 6, 2016, the same U.S. Government-funded network RFE repeated these fabrications, underwritten by the support of BBG's funding: "Another adviser, Carter Page, reportedly met with top Kremlin officials including those under U.S. sanctions."³ (the "RFE Pre-Election Report")

5. The 2016 Yahoo Report came amidst an extensive series of defamatory articles against Dr. Page by HuffPost, beginning no later than June 21, 2016 and continuing through at least July 30, 2017 (the "HuffPost Plaintiff Oeuvre").

6. On July 25, 2016, Verizon Communications Inc. ("Verizon") and Yahoo announced they had entered into a definitive agreement under which Verizon will acquire Yahoo's operating business for approximately \$4.83 billion in cash, subject to customary closing adjustments.⁴ This acquisition was completed on June 13, 2017:

"Verizon has combined these assets with its existing AOL business to create a new subsidiary, Oath, a diverse house of more than 50 media and technology brands that engages more than a billion people around the world. The Oath portfolio includes HuffPost, Yahoo Sports, AOL.com, MAKERS, Tumblr, BUILD Studios, Yahoo Finance, Yahoo Mail and more, with a mission to build brands people love... Tim Armstrong, former CEO of AOL, is now CEO of Oath, which is part of Verizon's Media and Telematics organization. He has been leading integration planning teams since the Yahoo transaction was announced in July 2016, and Oath begins operation today as a global leader in digital and mobile. See www.oath.com for further information."⁵

7. Although Yahoo and BBG's grantee RFE specifically knew that at least portions of the article were untrue or misrepresented, they printed the allegations including those portions

² "Report: U.S. Intelligence Officials Examining Trump Adviser's Russia Ties," Radio Free Europe / Radio Liberty, September 24, 2016. [<http://www.rferl.org/a/report-us-intelligence-probes-trump-advisers-russia-ties-kremlin/28010062.html>]

³ Mike Eckel, "Reset To Overload: Russia-U.S. Ties Have Changed, No Matter Who Wins The Election," Radio Free Europe / Radio Liberty, November 6, 2016. [<http://www.rferl.org/a/u-s-election-trump-clinton-relations-russia/28100058.html>]

⁴ <http://www.verizon.com/about/news/verizon-acquire-yahoos-operating-business>

⁵ <http://www.verizon.com/about/news/verizon-completes-yahoo-acquisition-creating-diverse-house-50-brands-under-new-oath-subsiary>

that falsely accused Dr. Page of participating in an alleged conspiracy to commit crimes against the U.S. Democratic Party's Leadership, not to mention a conspiracy to undermine American democracy and the 2016 U.S. election. With respect to Dr. Page, these allegations were wholly and completely false.

PARTIES

8. Plaintiff Carter Page, Ph.D. ("Dr. Page") is an individual who currently resides in the state of New York. Dr. Page is the Managing Partner of Global Energy Capital LLC ("GEC"), a New York Corporation with principal offices in New York City, and a scholar in foreign policy. According to its website, GEC is, "an investment management and advisory firm focused on the energy sector primarily in emerging markets."⁶

9. Defendant Oath is a Delaware Corporation with offices in New York City. According to its website, Oath is, "a digital media company of more than 50 media and technology brands, including HuffPost, Yahoo Sports, Tumblr, Engadget, Autoblog, and AOL.com."⁷ Oath is a subsidiary of Verizon Communications Inc., a Delaware Corporation with offices in New York City. According to Verizon, Oath, "is a combination of AOL and Yahoo brands, serving approximately 1 billion unique monthly users globally and currently represents about \$7 billion in annual revenue," officially launched on June 13, 2017, upon Verizon's completion of the acquisition of Yahoo's operating assets.⁸

10. Oath brand Yahoo is a Delaware corporation that provides "a guide to digital information discovery, focused on informing, connecting, and entertaining our users through our search, communications, and digital content products". Yahoo Holdings, Inc. is a Delaware corporation that was formed in connection with the sale transaction of Yahoo to Verizon described below. Prior to completion of this sale transaction, Yahoo transferred to Yahoo Holdings all of the assets and liabilities of Yahoo's operating business.⁹ The 2016 Yahoo Report was written during the interim period by the Chief Investigative Correspondent of Yahoo News, Mr. Michael Isikoff ("Mr. Isikoff"). Mr. Isikoff is based in Washington, DC. He followed the article with other media presentations, including on MSNBC and via Twitter.

11. Defendant BBG is a Federal Agency responsible for all U.S. government and government-sponsored non-military international broadcasting. BBG oversees a number of individual U.S. broadcasting organizations including RFE. BBG is located in Washington, D.C. According to BBG's Fiscal Year 2018 Congressional Budget Justification, "BBG is the U.S.

⁶ <http://globalenergycap.com>

⁷ <https://www.oath.com/press/slipstream-announces-oath-as-exclusive-digital-media-partner/>

⁸ <http://www.verizon.com/about/investors/quarterly-reports/2q-2017-quarter-earnings-conference-call-webcast>

⁹

<https://www.sec.gov/Archives/edgar/data/1011006/000119312516706578/d206374dprem14a.htm>

government's civilian international media agency, comprising the Voice of America (VOA), Radio Free Europe/Radio Liberty, Radio Free Asia (RFA), Alhurra TV and Radio Sawa...¹⁰

12. Jeffrey Shell ("Mr. Shell"), a senior executive at NBCUniversal¹¹, was named to the BBG by Barack Obama on September 12, 2012.¹² "He was confirmed to the board on August 1, 2013 and served as Chairman of the Broadcasting Board of Governors from August 1, 2013 and until January 25, 2017".¹³ According to an October 7, 2012 report by AllGov.com, "A Democrat, Shell has made political contribution totaling \$222,950 since 1995, mostly to Democratic candidates and committees, including \$82,600 to the Democratic National Committee, \$16,500 to the Democratic Senatorial Campaign Committee, and thousands to numerous Democratic candidates, mostly at the Senatorial level. He has also contributed \$42,000 to two broadcasting-related PACs: \$25,000 to ComCast PAC and \$17,000 to the National Cable and Telecommunications Association."¹⁴

13. RFE/RL, Inc. ("RFE") is a Delaware non-profit corporation. It is funded by the BBG and is best known for its broadcast services, including Radio Free Europe and Radio Liberty. According to a May 2017 U.S. Department of State Office of Inspector General inspection, RFE had an approximate annual budget in FY 2016 of \$108,414,000.¹⁵ As some commentators correctly predicted at the time of PL 112-239's enactment in 2013, the historically unprecedented civil rights violations of Dr. Page during the first U.S. Presidential Election in which BBG's grantee RFE under its auspices are unconstitutional with particular reference to the First Amendment.¹⁶

JURISDICTION, VENUE, AND CONDITIONS PRECEDENT

14. This court has federal question jurisdiction pursuant to 28 U.S.C. § 1331.

15. This court has jurisdiction over Dr. Page in accordance with 28 U.S.C. § 1332. In the time period following the 2016 Yahoo Report on September 23, 2016 and Inauguration Day of January 20, 2017, Dr. Page was an individual who changed his location frequently as a protective defense to minimize the risk of repeated threats against his life resembling domestic

¹⁰ https://www.bbg.gov/wp-content/media/2017/05/FY2018Budget_CBJ_05-23-17.pdf

¹¹ <https://www.universalpictures.com/leadership-team/jeff-shell>

¹² <https://obamawhitehouse.archives.gov/the-press-office/2012/09/12/president-obama-announces-more-key-administration-posts>

¹³ <https://www.bbg.gov/who-we-are/our-leadership/board/jeff-shell/>

¹⁴ <http://www.allgov.com/news/appointments-and-resignations/chairman-of-the-broadcasting-board-of-governors-who-is-jeffrey-shell-121007>

¹⁵ <https://www.bbg.gov/networks/rferl/>

¹⁶ According to one analysis of the untested and problematic new standards: "It removes the protection for Americans. It removes oversight from the people who want to put out this information. There are no checks and balances. No one knows if the information is accurate, partially accurate, or entirely false." https://www.buzzfeed.com/mhastings/congressmen-seek-to-lift-propaganda-ban?utm_term=.nyarAE2Zb#.oiZkrJVmZ

terrorism which first began during those approximately 118 days. Although he has maintained the State of New York as his principal mailing address since his birth on June 3, 1971, he spent less than 30% of his time or only approximately 35 days in New York during that period of approximately 4-months. The vast majority of the death threats stemming from the 2016 Yahoo Report were received during the approximately 55 days that Dr. Page spent in other parts of the U.S. away from the State of New York (47% of the time) and in the 28 days he spent in other countries outside the United States (23% of the time). Dr. Page is currently a citizen of the State of New York.

16. Oath is a Delaware corporation with its principal place of business at 770 Broadway, New York, New York.

17. Oath subsidiary Yahoo Inc. is a Delaware corporation that provides “a guide to digital information discovery, focused on informing, connecting, and entertaining our users through our search, communications, and digital content products”.¹⁷ In a proxy statement dated April 24, 2017, the purchase price that Verizon agreed to pay or cause to be paid in the sale transaction was announced as \$4,475,800,000 in cash, subject to certain adjustments.¹⁸ Yahoo Holdings, Inc. is a Delaware corporation that was formed by Yahoo Inc. in connection with the sale transaction to Verizon. On July 25, 2016, Verizon Communications, Inc. (“Verizon”) formally announced its intent to acquire Yahoo’s internet business for \$4,825,800,000.

18. Prior to completion of this sale transaction, Yahoo transferred to Yahoo Holdings all of the assets and liabilities of Yahoo’s operating business (“Yahoo”).¹⁹ The 2016 Yahoo Report was written during the interim period by Mr. Isikoff, Chief Investigative Correspondent of Yahoo News. Mr. Isikoff is based in Washington, DC. He has frequently appeared on MSNBC, CNN, Twitter and other media platforms.

19. Defendant BBG’s grantee RFE is a Delaware non-profit corporation. It is funded but not controlled by the federal government and is best known for its broadcast services, including Radio Free Europe and Radio Liberty. As an agency acting in its official capacity or under color of legal authority, this court has jurisdiction over BBG pursuant to 28 U.S.C. § 1346 and 28 U.S.C. § 1391.

20. Oath subsidiary HuffPost’s Reporters, Editors and Contributors who have written or co-written an extensive compilation of libelous articles that attacked Dr. Page as a principle target or amongst other third parties (the “HuffPost Plaintiff Oeuvre”). These authors include

¹⁷ <http://www.verizon.com/about/news/verizon-acquire-yahoos-operating-business>
https://www.sec.gov/Archives/edgar/data/1011006/000119312516656036/d178500dex21.htm#ex2_1toc178500_1

¹⁸ <https://www.sec.gov/Archives/edgar/data/1011006/000119312517133449/d206374ddefm14a.htm>

¹⁹ <https://www.sec.gov/Archives/edgar/data/1011006/000119312516706578/d206374dprem14a.htm>

Jessica Schulberg, Akbar Shahid Ahmed, Ryan Grim, Daniel Marans, Matt Fuller, Brad Schreiber, Michael Winship, Jennifer Sabin, Richard North Patterson, Peter Lance, Donna Kassin, David Simon, Warren Goldstein, Lauren Weber, Amanda Terkel, Jon Hotchkiss and others.

21. This Court has personal jurisdiction over Oath pursuant to New York Civil Practice Law and Rules § 301 (“CPLR”) because Oath has offices and its principal place of business in New York, New York, and the causes of action alleged herein arise out of Oath’s executive editorial and internet content distribution activities which are managed in New York, New York. This Court also has personal jurisdiction over Oath under CPLR § 302(a) because this action arises out of Oath’s transaction of business in New York, New York.

22. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and involves citizens of different states.

23. Although the defamatory articles written and published by Oath and BBG’s grantee RFE including the 2016 Yahoo Report, the RFE Republication and the HuffPost Plaintiff Oeuvre led to widespread pre-trial publicity, this negative impact on the Plaintiff was experienced throughout the United States and around the world as Dr. Page sought to repair the damage created by the Defendants. Thus, no change of venue appears required given the ill will and public animosity that the Defendants played a key role in sowing against Dr. Page throughout the United States.

24. Venue properly lies within this judicial district pursuant to 28 U.S.C. § 1391 because the principal place of business for Defendant Oath and final editing responsibility for Oath’s subsidiary HuffPost responsible for the HuffPost Plaintiff Oeuvre is based in this judicial district and a substantial portion of the events giving rise to the claims asserted in this action occurred in or were managed from this judicial district by executives of Oath.

25. All conditions precedent to the filing and maintenance of this action have been performed, have occurred or have been waived.

THE FACTS

Overview of Parties, Related Corporations/Brands, Employees and Key Associations

26. Oath Chief Executive Officer Tim Armstrong (“Mr. Armstrong”) is a business executive who has personally met and spoken with Mrs. Hillary Clinton (“Mrs. Clinton”). Mr. Armstrong personally and Oath as a corporation played a material role in actively supporting Mrs. Clinton throughout key moments in her 2016 Presidential campaign (the “Clinton Campaign”). Prior to becoming the CEO of Oath in 2017, Mr. Armstrong held the position of Chairman and CEO of Verizon’s AOL Inc. subsidiary since 2009.²⁰ During this period, he led

²⁰ http://money.cnn.com/2009/03/12/technology/aol_ceo/index.htm

the Oath brand responsible for a documentary honoring Mrs. Clinton (the “AOL Clinton Documentary”).

27. Carter Page (“Dr. Page”) has never personally met or spoken with Mr. Donald J. Trump (“Mr. Trump”). Dr. Page volunteered as a junior, unpaid, informal advisor to the Donald J. Trump for President campaign in early 2016 (the “Trump Campaign”). His ability to make any supportive contribution as a private citizen during this U.S. democratic process in 2016 was effectively blocked due to numerous libelous articles by Oath assets Yahoo and HuffPost, as well as some additional but far less egregious articles published by other media organizations. The subsidiaries of Oath played the preeminent role in the destruction of Dr. Page’s reputation and led to many associated threats to his life, particularly as it relates to the Defendants’ false accusations that he met with Mr. Sechin and Mr. Diveykin. Dr. Page is a 46-year-old financial executive and foreign policy scholar. In 2008, he founded GEC – a company that specializes in investment advisory and direct investments in the energy sector worldwide.

28. HuffPost is a subsidiary of Oath. Originally named the “Huffington Post”, the media organization officially changed its name to HuffPost in April 2017.²¹ Many of the defamatory articles regarding Dr. Page in the HuffPost Plaintiff Oeuvre have included a standard disclaimer at the bottom of their internet postings: “Editor’s note: Donald Trump regularly *incites political violence and is a serial liar...*”²² (Emphasis added) To the contrary, this description represents a perfect summary of the direct impact created by a substantial proportion of HuffPost’s libelous articles about Dr. Page: the regular incitement of political violence by a serially fraudulent online media organization. On multiple occasions, malicious reports from Oath assets including HuffPost, particularly relating to alleged meetings with Russians sanctioned officials including Mr. Sechin as per the false reports by the Defendants, led to a significant risk of political violence in the form of threatening statements directed at Dr. Page.

Oath in the 2016 Election, the 2016 Yahoo Report and the malevolent redefinition of Dr. Page by Oath media assets and BBG’s RFE

29. At New York’s Roosevelt Island on June 13, 2015, the Clinton Campaign organized what HuffPost described as: “Hillary Clinton’s Launch Speech”.²³ From a media perspective, this event marked the official start of Mrs. Clinton’s campaign.

30. Approximately five months later, then-CEO and Chairman of Verizon’s AOL Inc., Mr. Armstrong played a leading role in “AOL’s MAKERS: Once And For All Premiere at the SVA Theatre on November 19, 2015 in New York City”.²⁴ (the “Clinton-Armstrong Event”)

²¹ http://www.huffingtonpost.com/entry/huffington-post-huffpost-lydia-polgreen_us_58fce1cae4b00fa7de1522ee

²² For example: http://www.huffingtonpost.com/entry/donald-trump-advisers-russia-ties_us_57acd474e4b007c36e4db94c

²³ http://www.huffingtonpost.com/richard-kirsch/the-economic-narrative-in_b_7598016.html

²⁴ <http://www.docnyc.net/featured/on-closing-night-hillary-clinton-reflects-on-a-rallying-cry/>

Mr. Armstrong is married to Nancy Armstrong (“Mrs. Armstrong”),²⁵ a founding member of the Oath brand responsible for the AOL Clinton Documentary.²⁶ The website of host DOC NYC, describes the event as: “America’s largest documentary film festival”.²⁷ According to the DOC NYC website:

With the most high-profile guest of this year’s DOC NYC programming, a packed house at Thursday night’s screening of Makers: Once and For All eagerly awaited the arrival of presidential candidate and documentary subject Hillary Clinton.

While rain poured outside, audience members checked their umbrellas at the front desk of Chelsea’s SVA Theater. *The Secret Service was also in attendance and did not allow umbrellas inside the theater.*

At the start of the evening, CEO and Chairman of AOL Inc., Tim Armstrong, took the stage to introduce the night’s guest of honor.

*“Leaders are not judged by their number of followers, leaders are judged by the leaders they create,” Armstrong said, in obvious reference to the impact Clinton has had on women worldwide.*²⁸

(Emphasis added)

31. Photos available on the Still4Hill blog display the mutually supportive and appreciative rapport exhibited in the strategic relationship between Mrs. Clinton, Mr. Armstrong, Oath, and Oath brands (the “Still4Hill Blog”,²⁹ attached as **Exhibit 3**):

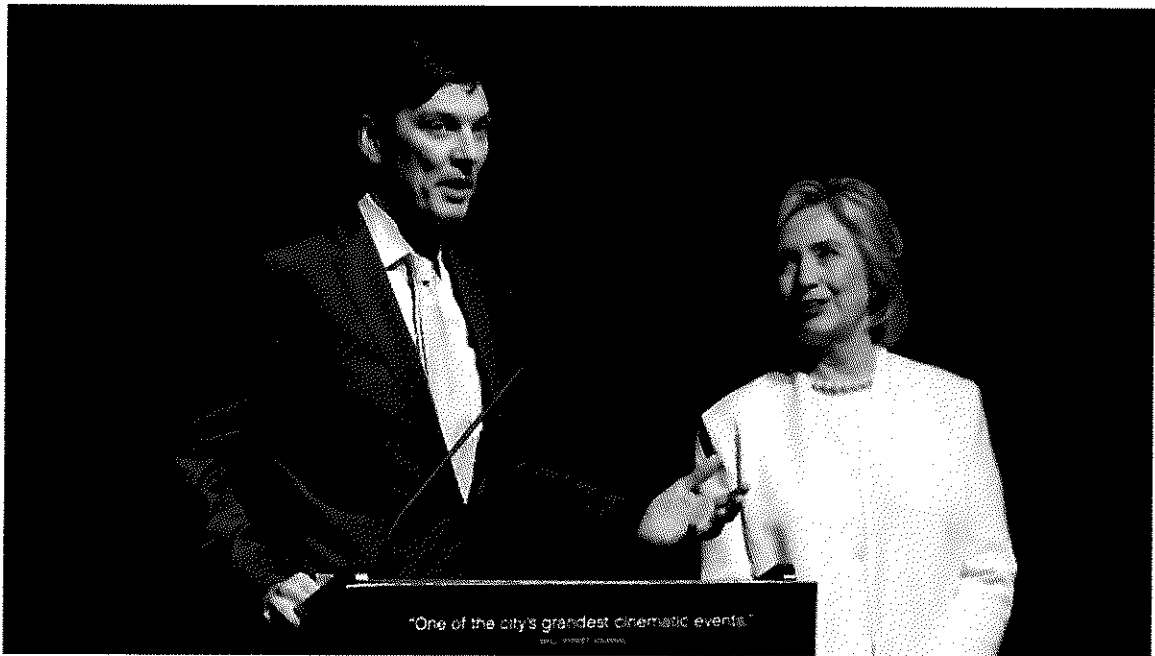
²⁵ <https://www.makers.com/conference/speaker/nancy-armstrong>

²⁶ http://www.imdb.com/title/tt5276924/plotsummary?ref=tt_ov_pl

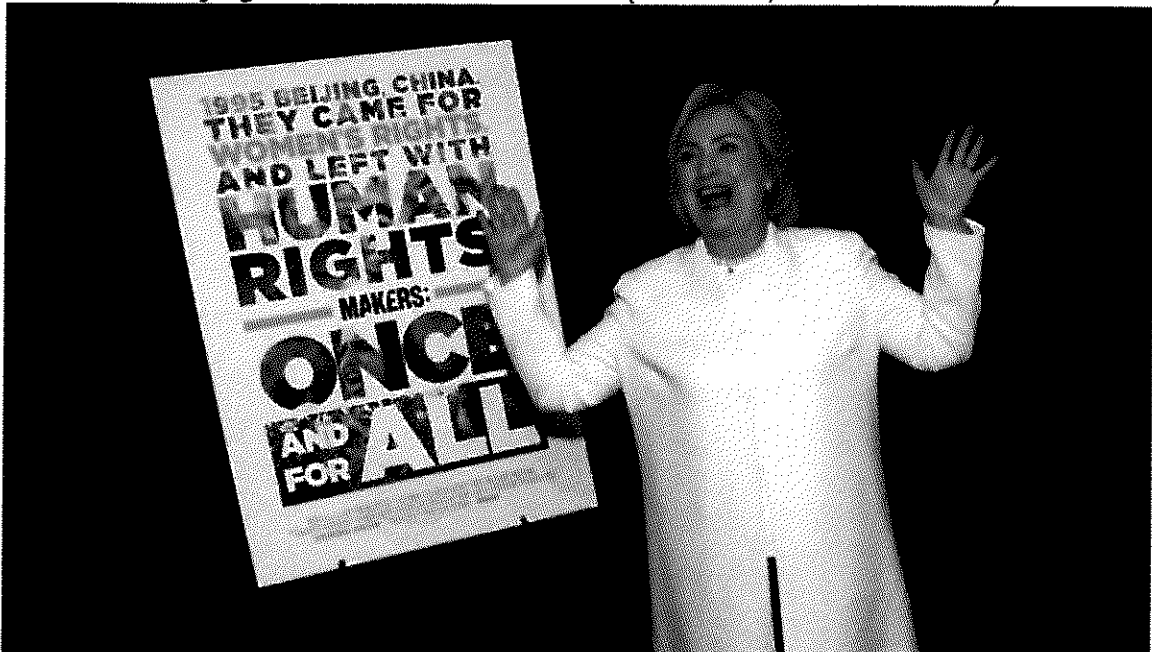
²⁷ <http://www.docnyc.net/about-us/what-is-doc-nyc/>

²⁸ <http://www.docnyc.net/featured/on-closing-night-hillary-clinton-reflects-on-a-rallying-cry/>

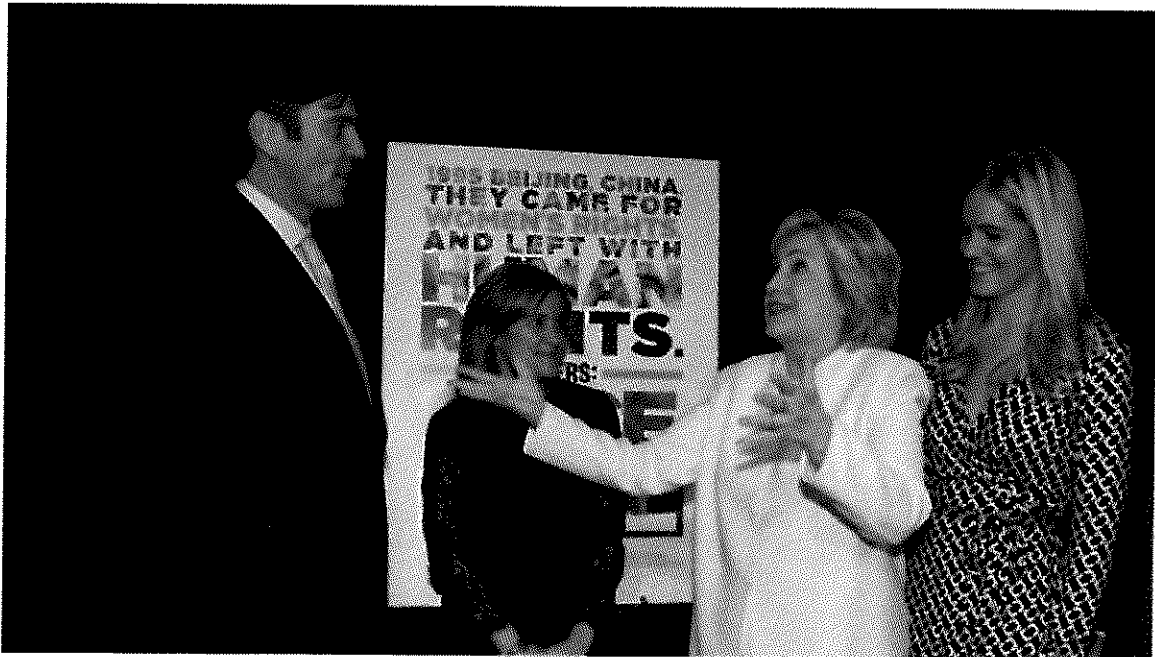
²⁹ <https://still4hill.com/2015/11/19/hillary-clinton-at-once-and-for-all-premiere/>



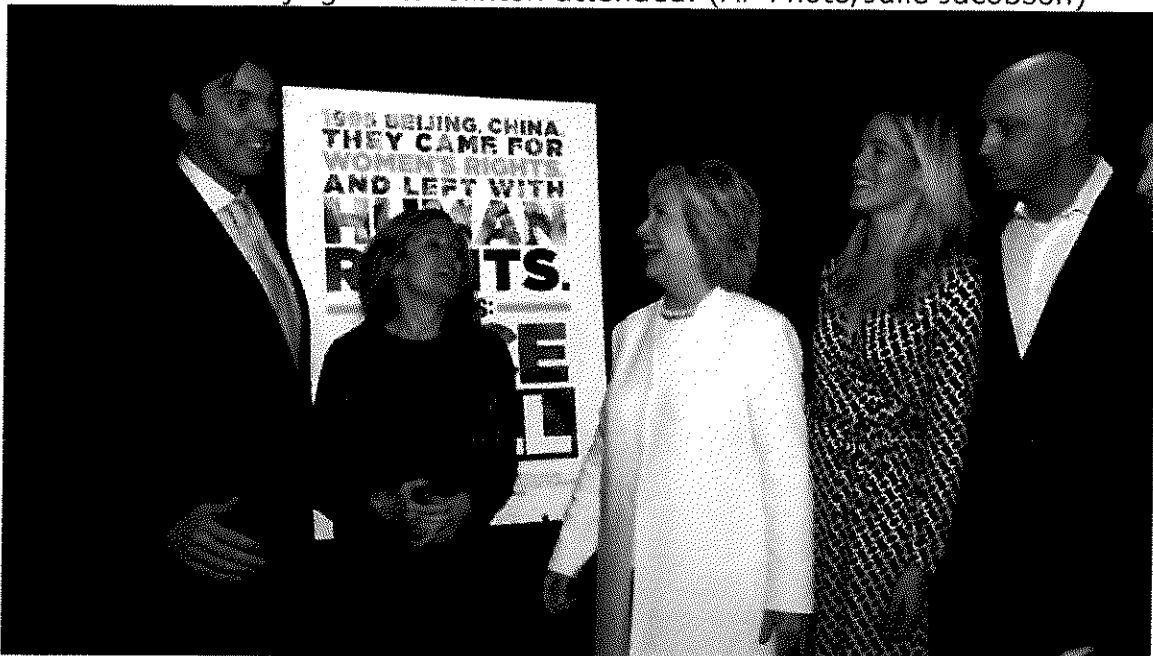
AOL CEO and chairman Tim Armstrong, left, introduces Democratic presidential candidate Hillary Rodham Clinton before the premiere of the movie "Makers: Once and for All", Thursday, Nov. 19, 2015, in New York. The movie chronicles the months in 1995 leading up to the U.N. Fourth World Conference on Women in Beijing which Clinton attended. (AP Photo/Julie Jacobson)



Democratic U.S. presidential candidate Hillary Clinton arrives for the premiere of the documentary film "Makers: Once And For All" at the DOC NYC documentary film festival in the Manhattan borough of New York City November 19, 2015. "Makers: Once And For All" tells the story of the 1995 Beijing Women's Conference and features commentary from the former U.S. First Lady and Secretary of State. REUTERS/Mike Segar



Democratic presidential candidate Hillary Rodham Clinton, second from right, greets AOL chairman and CEO Tim Armstrong, left, before the premiere of the movie "Makers: Once and for All," Thursday, Nov. 19, 2015, in New York. The movie chronicles the months in 1995 leading up to the U.N. Fourth World Conference on Women in Beijing which Clinton attended. (AP Photo/Julie Jacobson)



Democratic U.S. presidential candidate Hillary Clinton greets AOL CEO Tim Armstrong (L) as she arrives for the premiere of the documentary film "Makers: Once And For All" at the DOC NYC documentary film festival in the Manhattan borough of New York City, November 19, 2015. "Makers: Once And For All" tells the story of the 1995 Beijing Women's Conference and features commentary from the former U.S. First Lady and Secretary of State.

Also pictured are director Dyllan McGee (2nd L), producer Samantha Leibovitz (2nd R) and director Michael Epstein (R). REUTERS/Mike Segar³⁰

32. On September 23, 2016, Oath subsidiary Yahoo would eventually publish the malicious 2016 Yahoo Report based on opposition political research marketed by the Clinton Campaign that subsequently led to an escalating and sustained series of death threats aimed at Dr. Page. Nearly two months earlier, on July 26, 2016, Dr. Page received the following text messages from a reporter at the *Wall Street Journal*. This communication first gave Dr. Page advanced warning of the potentially deadly falsehoods which associates of the Clinton Campaign were unsuccessfully attempting to spread throughout the news industry via loyal media outlets like Oath's predecessor brands, which Mr. Armstrong had successfully deployed in November 2015 to help Mrs. Clinton gain initial momentum for her new campaign:

- "We are told you met with Igor Sechin during your recent Moscow trip and discussed energy deals and the possibility of the U.S. Government of lifting sanctions on him and others."
- "We are also told you recently met with a senior Kremlin official - Divyekin - and he said they have solid kompromat on Clinton as well as Trump."
- "Guidance? Thoughts?"

33. Seeking to preserve his privacy as a private person, Dr. Page informed the reporter via text message: "It's such a ridiculous idea that it almost warrants a double-no-comment." As a private person at the time, who sought to maintain his isolation from the media by avoiding interviews with or statements to the press, Dr. Page frequently repeated "no comment" when these same false allegations originating from associates of the Clinton Campaign about Mr. Sechin and Mr. Diveykin were repeatedly asked by reporters over the course of the next approximately 60 days until the 2016 Yahoo Report was recklessly published by Oath affiliates and BBG's grantee RFE.

34. Underscoring the fact that there was never any deadline pressure associated with these falsehoods which might have somehow mitigated the ability of responsible news agencies and journalists to verify these outrageously inconceivable accusations, reporters from a diverse array of media outlets continued to address these same questions to Dr. Page throughout the following two months until the 2016 Yahoo Report was published on September 23, 2016.

35. On or about 2:08 PM on Thursday, September 15, 2016, Mr. Isikoff left a voicemail for Dr. Page communicating roughly the following: "Uh, Carter Page, hey, it's Mike Isikoff with uh Yahoo News if you could please give me a call at 202 - ____ - ____ [Mobile phone number, registered in Washington, DC]. 202 - ____ - ____ [Mobile phone number, registered in Washington, DC, repeated]. Thanks."

36. On or about 5:23 PM on Thursday, September 22, 2016, Mr. Isikoff again left a similar voicemail for Dr. Page communicating roughly the following: "Uh, Mr. Page, this is

³⁰ Ibid.

Mike Isikoff with Yahoo News if you could please give me a call. 202 - ___ - ____ [Mobile phone number, registered in Washington, DC]. 202 - ___ - ____ [Mobile phone number, registered in Washington, DC, repeated]. Thanks.”

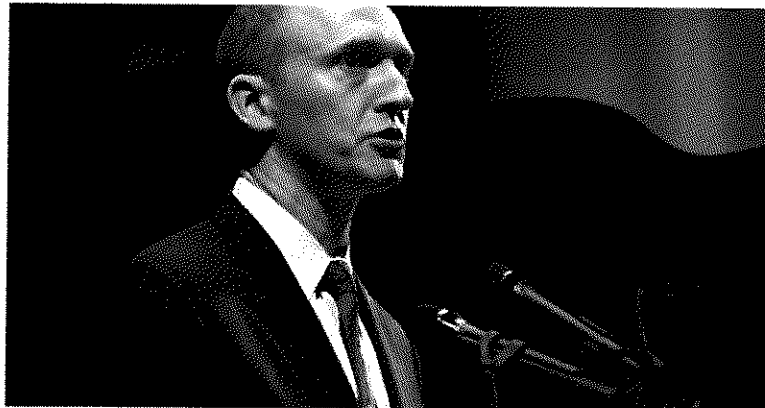
37. As a private person at the time, who was trying to avoid publicity, Dr. Page never responded to either of these voicemail requests or any other inquiry that Mr. Isikoff may have attempted. These short communications on September 15, 2016 and September 22, 2016 offered no advance warning of the blatantly destructive substance of the malevolent attack which Defendant Oath’s brand Yahoo had planned for the following week and the following day, respectively, in the form of the 2016 Yahoo Article which was eventually published on the morning of September 23, 2016.

38. Mr. Isikoff publicized the 2016 Yahoo Report via Twitter at 11:12 AM on September 23, 2016:

Michael Isikoff

@Isikoff

**U.S. intel officials probe ties between
@realDonaldTrump advisor Carter Page and
the Kremlin**



U.S. intel officials probe ties between Trump adviser and Kremlin

Carter Page speaks at the graduation ceremony for the New Economic School in Moscow in July. U.S. intelligence officials are seeking to determine whether an Am...

yahoo.com

11:12 AM - 23 Sep 2016 from Manhattan, NY

39. The libelous 2016 Yahoo Report focused on two primary false allegations about meetings which Dr. Page never participated in, involving individuals he has never communicated with at any point throughout his life. The first related to Mr. Sechin:

“...U.S. officials have since received intelligence reports that during that same three-day trip, Page met with Igor Sechin, a longtime Putin associate and former Russian deputy prime minister who is now the executive chairman of Rosneft, Russian’s leading oil company, a well-placed Western intelligence source tells Yahoo News. *That meeting, if confirmed*, is viewed as especially problematic by U.S. officials because the Treasury Department in August 2014 named Sechin to a list of Russian officials and businessmen sanctioned over Russia’s “illegitimate and unlawful actions in the Ukraine.” (The Treasury announcement described Sechin as “utterly loyal to Vladimir Putin — a key component to his current standing.” At their *alleged* meeting, Sechin raised the issue of the lifting of sanctions with Page, the Western intelligence source said.”
(Emphasis added)

40. Although each of the respective statements was exceedingly reckless, the second alleged meeting related to Mr. Diveykin dropped any meaningless caveats such as “alleged” or “if confirmed”, thereby falsely accusing Dr. Page as the leading American suspect with respect to his possible collaboration with those Russian officials allegedly bearing, “Responsibility for intelligence collected by Russian agencies about the U.S. election”:

“U.S. intelligence agencies have also received reports that Page met with another top Putin aide while in Moscow — Igor Diveykin. A former Russian security official, Diveykin now serves as deputy chief for internal policy and is believed by U.S. officials to have responsibility for intelligence collected by Russian agencies about the U.S. election, the Western intelligence source said.”

41. The 2016 Yahoo Report falsely claims: “The source added that U.S. officials in the briefings indicated that intelligence reports about the adviser’s talks with senior Russian officials close to President Vladimir Putin were being ‘actively monitored and investigated.’” In addition to the fact that the libelous assertion regarding the characterization of these so-called “intelligence reports” were known to be illegitimate, or with reckless disregard for whether it is true or false, no “alleged” or “unverified” qualifiers were attached to the false assertion that: “the adviser’s talks with senior Russian officials close to President Vladimir Putin were being ‘actively monitored and investigated’”. These and other false statements throughout the 2016 Yahoo Report carry the deceitful implication that the documents referred to were actual U.S. Government reports rather than opposition political research by Christopher Steele (“Mr. Steele”), a consultant hired by associates and/or supporters of the Clinton Campaign.

42. With the 2016 Yahoo Report, Yahoo and other Oath media brands thus falsely implied Dr. Page’s potential direct blame for one of the most prominent world news stories and controversial alleged transnational crimes of 2016 and 2017:

“The questions about Page come amid mounting concerns within the U.S. intelligence community about Russian cyberattacks on the Democratic National Committee and state election databases in Arizona and Illinois. In a rare public talk this week, former undersecretary of defense for intelligence Mike Vickers said that the Russian cyberattacks constituted meddling in the U.S. election and were ‘beyond the pale.’ Also, this week, two senior Democrats — Sen. Dianne Feinstein, ranking minority member on the Senate Intelligence Committee, and Rep. Adam Schiff, ranking minority member on the House Intelligence Committee — released a joint statement that went further than what U.S. officials had publicly said about the matter.”

43. Dr. Page had previously given two speeches at New Economic School (“NES”), a private university in Moscow in July 2016.

44. In an attempt by Mr. Isikoff to pick one sentence from a 4,887 word academic lecture given by Dr. Page on July 7, 2016 (the “NES Academic Lecture”, attached as **Exhibit 4**) and impute to it a treasonous connotation that the whole lecture, let alone the specific sentence, will not bear, Oath’s 2016 Yahoo Report alleged that Dr. Page’s speech was accurately characterized by one sentence: “‘Washington and other West capitals’ had impeded progress in Russia ‘through their often hypocritical focus on ideas such as democratization, inequality, corruption and regime change.’”

45. In addition to reflecting Mr. Isikoff’s broader fixation on false Russia-related conspiracy theories, the characterization of Dr. Page’s remarks being focused on Russia is also factually inaccurate. While this quote from the 2016 Yahoo Report carries the false implication that these comments related specifically to Russia, it instead was presented to scholars as part of Dr. Page’s prior academic research stemming from an extensive analysis of comparative political economy encompassing at least 8 countries and a population of almost 2 billion people. In the paragraph immediately preceding Mr. Isikoff’s misleading quote found on page 3 of the 25-page transcript of Dr. Page’s NES Academic Lecture, he specifically explained: “As prevalent definitions of capitalism and related theories of political economy have been either discarded or fundamentally rewritten in recent decades, the trends and potential of the world economy has often followed suit. *Offering useful case studies of these dynamics, Russia, the U.S., China and Central Asia have to varying extents each continued to adjust to new practical realities through subtle shifts in governance.* Using alternative techniques and approaches, these countries and regions have each to varying degrees and in different formats balanced state control of economic development with free-market principles.” (Emphasis added)

46. Entirely contrary to the 2016 Yahoo Report, the central focus of Dr. Page’s NES Academic Lecture was the concept of “mutual respect” in the theory and practices of international relations and international political economy. Dr. Page referred back to this principal concept more than a dozen times in his remarks.

47. Further underscoring exceedingly low journalistic standards and the completely fictional nature of almost every aspect of the 2016 Yahoo Report, Mr. Isikoff also falsely alleges that the cited quote related to Dr. Page’s commencement address on Friday, July 8, 2016 (the

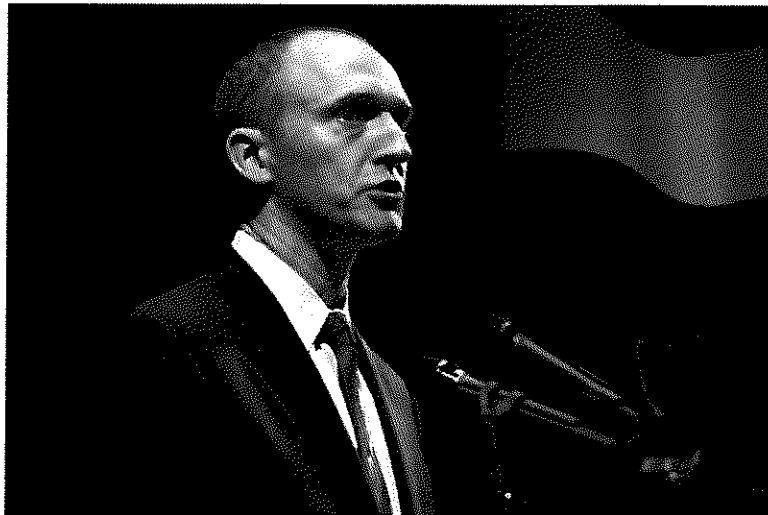
“NES Commencement Address”): “Speaking at a *commencement address* for the New Economic School, an institution funded in part by major Russian oligarchs close to Putin”. (Emphasis added) In actuality, the quote which he took out of context was from the Thursday, July 7, 2016 NES Academic Lecture before current NES students, recent NES graduates and guests.

48. Radio Free Europe did not repeat Yahoo’s false identification of this speech as the NES Commencement Address nor falsely claim that Yahoo’s, Mr. Isikoff’s and other Oath assets’ selected quote was only about Russia. But RFE similarly imputed a potentially treasonous connotation since Dr. Page may have in any way deviated from the dominant ideology of U.S. foreign policy, which some demand must remain closely adhered to throughout the ages. The BBG-funded state new agency thus alleged that after the NES Academic Lecture: “Page raised eyebrows in U.S. political circles in July with a lecture he delivered to students and businesspeople in Moscow in which he accused ‘Washington and other Western capitals’ of impeding other nations’ ‘potential progress through their often hypocritical focus on ideas such as democratization, inequality, corruption, and regime change’ -- criticisms that echo those frequently voiced by the Kremlin.”³¹

49. In a reference to Dr. Page, Yahoo recklessly misquoted an adviser to Mr. Trump: “...Hope Hicks last month called him an ‘*informal foreign adviser*’...” To the contrary, the original *Washington Post* article specifically stated that, “Hope Hicks said Page was an ‘*informal foreign policy adviser*’...”³² (Emphasis added) The alteration from the original wording resulted in a material change in the meaning conveyed by the statement of Hope Hicks, further supporting the falsity of the article’s implication that Dr. Page was in some way a foreign agent working to advance the interests of the Russian government. This completely fictional misrepresentation remained consistent with much of the rest of the 2016 Yahoo Report including the dramatically falsified photo featured adjacent to the title at the top of the first page, malevolently showing U.S. military veteran Dr. Page in front of a flag of the Russian Federation:

³¹ <https://www.rferl.org/a/report-us-intelligence-probes-trump-advisers-russia-ties-kremlin/28010062.html>

³² https://www.washingtonpost.com/business/economy/trump-advisers-public-comments-ties-to-moscow-stir-unease-in-both-parties/2016/08/05/2e8722fa-5815-11e6-9aee-8075993d73a2_story.html



50. Yahoo's 2016 Yahoo Report claims: "At the time, Page declined to say whether he was meeting with Russian officials during his trip, according to a Reuters report." Dr. Page "Declined to say" because he was attempting to avoid any contact with the media in the interest of protecting his privacy as a private citizen. As a result, he declined all interviews and questions from the news media to the greatest extent possible during the trip – a journey which was entirely separate from his limited prior volunteer work in support of the Donald J. Trump for President campaign, and as someone who has never directly met or spoke with Mr. Trump.

51. In another complete mischaracterization of the reality that has subsequently been revealed during U.S. Congressional testimony and reporting by BuzzFeed News in 2017, Yahoo asserts: "A senior U.S. law enforcement official did not dispute that characterization when asked for comment by Yahoo News. 'It's on our radar screen,' said the official about Page's contacts with Russian officials. 'It's being looked at.'"

52. "Page's contacts with Russian officials," were never on any U.S. Government official's radar screen because these alleged meetings cited in the 2016 Yahoo Report never occurred. Subsequent disclosures offer substantial proof of knowledge of this falsity, based on the meetings revealed between Oath employees and political opposition research consultant Mr. Steele. The technology for Radar, or RAdio Detection And Ranging systems, was first developed by the U.S. Navy as well as other military and civilian research institutions in the years leading up to World War II. In fact and as has been subsequently revealed, the actual primary object described in Yahoo's report on senior U.S. law enforcement officials' radar screen at the time as it relates to Dr. Page was chaff – a countermeasure designed to distract radar operators from reality and the truth on the horizon. In this instance and as was eventually disclosed in 2017, the chaff described and distributed in the 2016 Yahoo Report, the RFE Republication, the RFE Pre-Election Report, and the HuffPost Republication was created and marketed by associates of the Clinton Campaign. The highly injurious reporting of media assets associated with Oath, Inc., and BBG's grantee RFE, both in the United States and around the world recklessly played a prominent role in these exceedingly harmful, deceptive countermeasures.

53. An article published by the journalist Julia Ioffe (“Ms. Ioffe”)³³ later on Friday, September 23, 2016 (the “Ioffe Report”), included an interview which sought to check whether the allegations in the 2016 Yahoo Report regarding Dr. Page’s alleged meeting with Rosneft CEO Mr. Sechin were accurate. The 2016 Yahoo Report made no reference to any direct interview request or conversation that Mr. Isikoff or any employee of Yahoo, HuffPost, or any other Oath subsidiary may have made to Rosneft. The Ioffe Report described the response she received as follows:

“‘You are engaged in onanism,’ said [Mikhail] Leontiev, the spokesman for Rosneft and Sechin when I asked him if Page had met with Sechin. ‘It’s bullshit. Just bullshit. You need to understand who Sechin is to even ask this question. It’s hard to have a meeting with him at all. It’s absurd.’”

54. Ms. Ioffe had also tried contacting Dr. Page multiple times for an interview prior to publication of her article. Consistent with Dr. Page’s approach with Mr. Isikoff, he never responded to any of these requests in the interest of preserving his privacy. The Ioffe Report describes the comparison of some of the actual public perceptions regarding Dr. Page’s profile prior to September 23, 2016 and the fictional defamatory 2016 Yahoo Report as follows, including Yahoo’s and Mr. Isikoff’s intentionally false characterization that U.S. Government authorities were the source of the so-called “intelligence”:

I have been a Russia wonk for most of my adult life, I spent years living and reporting from Moscow, still go there regularly for reporting trips, and am in touch with lots of friends there. And yet, despite the tightly knit nature of the expat business community in Russia, no one I spoke to had ever heard of Carter Page.

“What’s this guy’s name?” says one former Western energy CEO who spent years in Russia, and would have overlapped there with Page.

“I had not heard of Carter Page before it came out in the media,” says another prominent Western businessman who has worked in the former Soviet Union for over two decades. “But I am getting a lot of emails from friends asking, ‘Have you heard of this guy?’”

³³ <http://www.politico.com/magazine/story/2016/09/the-mystery-of-trumps-man-in-moscow-214283>

“Strangely, I've never heard of Carter Page until this Trump connection,” Bill Browder responded to me in an email. He was one of the biggest Western players in the Russian market until President Vladimir Putin turned on him and Browder became his fierce critic. “It's odd, because I've heard of every other financier who was a player on Moscow at the time.”

Someone, apparently, has heard of him: On Friday, ***Yahoo News reported that Page was being probed by U.S. intelligence for purported back-channel ties to Russian leaders.***

(Emphasis added)

**The 2016 Yahoo Report, the Immediate Aftermath
and the Subsequent Proliferation of Harms to Dr. Page**

55. At approximately 6:41 PM Eastern Daylight Time (“EDT”) on September 23, 2016, the Hillary for America Press office distributed to an extensive list of media contacts an email with the subject line: “Hillary for America Statement on Bombshell Report About Trump Aide's Chilling Ties To Kremlin”. This communication included a statement from “HFA senior national spokesperson Glen Caplin” (the “September Hillary for America Statement”, attached as **Exhibit 5**).

56. On or about 11:55 pm EDT on September 25, 2016, RFE republished many of the core allegations from the 2016 Yahoo Report in the English language: “Report: U.S. Intelligence Officials Examining Trump Adviser's Russia Ties”³⁴ (the “RFE Republication”).

57. RFE published many of the core defamatory allegations from the 2016 Yahoo Report in the Russian language with an article entitled “В США проверяют советника Трампа относительно связей с Россией” via the U.S. Government’s Radio Svoboda propaganda website³⁵ (Радио Свобода) on September 25, 2016 (the “RFE Russian Republication”, attached as **Exhibit 6**). According to Google Translate, the title has the approximate meaning: “In the United States, the Trump's adviser on relations with Russia is checked”.³⁶

³⁴ <https://www.rferl.org/a/report-us-intelligence-probes-trump-advisers-russia-ties-kremlin/28010062.html>

³⁵ <https://www.svoboda.org/a/28171749.html.org/a/28011337.html>

³⁶

<https://translate.google.com/#auto/en/В%20США%20проверяют%20советника%20Трампа%20относительно%20связей%20с%20Россией%20via>

58. Further broadening the geographic scope and audience for this libel, RFE again published many of the core defamatory allegations from the 2016 Yahoo Report in the Ukrainian language with an article entitled “Спецслужби США з’ясовують контакти радника Трампа з Кремлем – Yahoo News” via the U.S. Government’s Ukrainian Radio Svoboda propaganda website³⁷ (Радіо Свобода) on September 25, 2016 (the “RFE Ukrainian Republication”, attached as **Exhibit 7**). According to Google Translate, the title has the approximate meaning of: “US intelligence services find out Trump adviser contacts with the Kremlin - Yahoo News”.³⁸

59. On or about 12:01 pm EDT on September 25, 2016, the text of a second Oath brand HuffPost republished many of the falsehoods of the 2016 Yahoo Report in a report entitled: “Trump Campaign: That Adviser Reportedly Talking With Russian Officials Isn’t An Adviser Anymore”³⁹ (the “HuffPost Republication”, attached as **Exhibit 8**). The article also included a web link to the full 2016 Yahoo Report and featured the video of an appearance by Mr. Isikoff on MSNBC’s “AM Joy” program on Saturday, September 24, 2016. In Mr. Isikoff’s interview with MSNBC host Joy Reid, he stated: “Now I should say, there are a lot of... there’s a lot of murkiness to this. Precisely what Page’s role in the Trump campaign, we don’t know...”⁴⁰

60. Instead of raising the far darker “murkiness” of Mr. Isikoff’s own highly unreliable sources whose allegations represented the cornerstone of why Yahoo’s libelous reporting which had risen towards the forefront of world news that weekend, his statement on MSNBC instead referred to this Oath reporter’s own questions about the self-evident nature of Dr. Page’s support to the Trump campaign. These comments on MSNBC provide further evidence of both Mr. Isikoff’s knowledge of the falsity of the 2016 Yahoo Report and his reckless disregard for the truth about what actually happened during Dr. Page’s July 2016 trip to Moscow. As Dr. Page clearly expressed on multiple instances during his speech at New Economic School: “I am speaking with you today as a private citizen and business executive, so this lecture only reflects my own ideas which I have developed over years past. Therefore, the ideas discussed do not necessarily reflect other people or organizations that I may be working with at the present time.” This was further clarified during his NES Academic Lecture to again underscore the reality that Dr. Page was not representing the Trump campaign in any way during his visit to Moscow. With respect to what role Dr. Page did play in supporting the Trump movement, he was unable to contribute any material assistance due to the malevolent personal attacks by Oath assets including HuffPost and Yahoo, RFE as well as to a far lesser extent other media outlets. This stands in stark contrast to the close, material support that Oath brands, employees and contractors provided in support of the Clinton Campaign, including Mr. Armstrong and Mr. Isikoff.

³⁷ <https://www.radiosvoboda.org/a/news/28010275.html>

³⁸

<https://translate.google.com/#auto/en/“Спецслужби%20США%20з’ясовують%20контакти%20Радника%20Трампа%20з%20Кремлем%20–%20Yahoo%20News”>

³⁹ <http://www.huffingtonpost.com/entry/trump-campaign-russia-carter->

[page us 57e7eb59e4b0e80b1ba299b9](page/us/57e7eb59e4b0e80b1ba299b9)

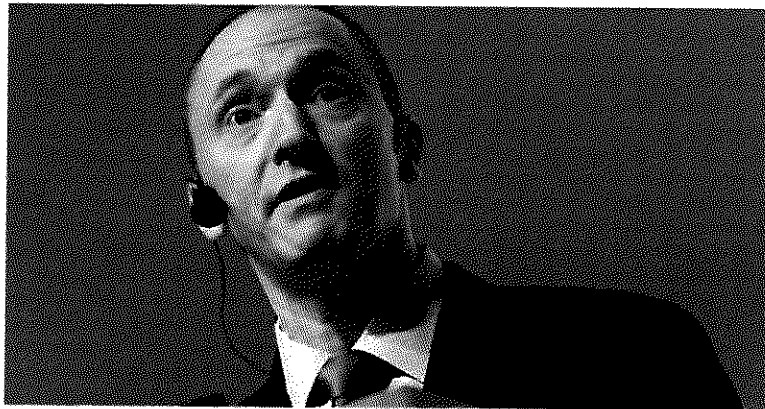
⁴⁰ Ibid.

61. Mr. Isikoff further advanced the defamatory misinformation campaign initiated by Yahoo by retweeting an article by a division of Walt Disney Company's subsidiary ABC, Inc. on Saturday, September 24, 2016. ABC News repeated the misinformation first published by Oath's Mr. Isikoff in the 2016 Yahoo Report by stating that: "Yahoo News reported Friday that during the same trip, Page may have also held private meetings with senior Russian officials. Page could not be reached Friday for comment for this report." This offers another example of how the 2016 Yahoo Report had already spread, creating potentially irreparable damage for Dr. Page:

Michael Isikoff

@Isikoff

Trump Suffers Another Bout of Russian Amnesia - ABC News



Trump Suffers Another Bout of Russian Amnesia

Donald Trump, a man who once boasted having "the world's greatest memory," has suddenly forgotten the role that was to be played by a controversial businessman he named to help guide his foreign...

abcnews.go.com

1:33 PM - 24 Sep 2016

62. Following these and other extensive reports throughout the weekend in the aftermath of the 2016 Yahoo Report, including the RFE Republication, the HuffPost Republication and other misinformation that had proliferated around the world with the support of Verizon's enormous media and telecommunications capabilities, Dr. Page wrote a letter to Director of the Federal Bureau of Investigation James Comey on the evening of Sunday, September 25, 2016 (the "FBI letter", attached as **Exhibit 9**). This represented a first initial effort to set the record straight regarding these malevolent defamatory falsehoods that originated from the Defendants. Prior to the revelation of the illegitimate source of the libelous information that had recently been distributed worldwide by Oath subsidiaries and BBG's grantee in the 2016

Yahoo Report, the RFE Republication, and the HuffPost Republication, the FBI Letter accurately assessed as a complete waste of time any inquiry of these sensationalist stories about Dr. Page and, how any resultant Federal investigations these falsehoods might inspire represented nothing more than a witch hunt. (the “Witch Hunt”)

63. Peter Stelfox, who previously served as the Head of Investigative Practice at the National Policing Improvement Agency in the U.K., has explained how synergistic relationships between media outlets and government law enforcement authorities may use public relations tactics to intersect with the agenda of legitimate criminal investigations. This analysis helps illustrate other elements of the impact created by the defamatory reports overseen and enabled by the Defendants, amidst the mass hysteria that the Witch Hunt subsequently created for Dr. Page:

“Most media outlets – newspapers, radio and television – are primarily interested in acquiring material to provide interesting stories. Crime is high on their list of interesting stories and so they are always willing to cover it. This provides investigators with an opportunity to publicise crimes and appeal for witnesses...Major crime investigations and high-profile incidents always attract media interest and investigators are usually able to deploy specialist resources from their force media department in these cases. Trained staff are able to advise on a media strategy that maximizes the chance of the crime being reported in ways that support the investigation. This often includes strategies for keeping the story in the news even when interest in it is waning.”⁴¹

64. As the malevolent defamatory allegations regarding Dr. Page stemming from the 2016 Yahoo Report showed some indication of possibly waning in the final days prior to the 2016 Presidential election, Co-Defendant BBG’s U.S. propaganda network RFE dutifully kept the story in the news by supportively repeating these propagandistic fabrications with the RFE Pre-Election Report on November 6, 2016, two days prior to most American voters went to the polls for the 2016 U.S. Presidential Election: “...Carter Page, **reportedly met with top Kremlin officials** including those under U.S. sanctions. Page **said last month** he had left the campaign. For her part, Clinton has made clear that she plans a more assertive approach to Russia. Many of her advisers on Russia and European affairs have spoken publicly about the need to push back against Moscow’s actions in Europe, Ukraine, Syria, and elsewhere. Among those heading her Russian advisory team are Michael McFaul, the former U.S. ambassador to Russia; Phil Gordon, a former White House and State Department official; and Julie Smith, a former Pentagon official and deputy national security advisor to Vice President Joe Biden. Also advising Clinton is James Stavridis, a retired U.S. admiral who was NATO’s commander between 2009 and 2013 and was short-listed to be Clinton’s running mate.”⁴²

⁴¹ Peter Stelfox, *Criminal Investigation: An Introduction to Principles and Practice*, Routledge, 2013, 110-111.

⁴² Mike Eckel, “Reset To Overload: Russia-U.S. Ties Have Changed, No Matter Who Wins The Election,” Radio Free Europe / Radio Liberty, November 6, 2016. [<http://www.rferl.org/a/u-s-election-trump-clinton-relations-russia/28100058.html>]

65. The public controversy that Oath and BBG originated worldwide regarding false allegations about Dr. Page’s participation in Russia’s alleged involvement in cyber operations related to the 2016 election did not exist before the publication of the the 2016 Yahoo Report, the RFE/RL Republication, the HuffPost Republication and subsequent media broadcasts of this libelous matter. The outcome of this prominent fabricated controversy had a monumental direct impact on not only Dr. Page, but individuals beyond those directly involved in the dispute. These individuals impacted by this malicious defamation included Mr. Trump and other supporters of his campaign, including peripheral ones such as Dr. Page (the “Trump Movement”).

66. With the exception of volunteering as an unpaid, informal member of a foreign policy advisory committee to the Donald J. Trump for President campaign, Dr. Page has never in any way been nor aspired to become a politician and was not a public figure prior to the defamatory articles published by the Defendants. Outside of academic foreign policy circles and energy finance circles, he was not known at all. A largely unknown figure, his Wikipedia page was first created within hours of the fictional 2016 Yahoo Article.⁴³

67. *Mother Jones* published a significantly more accurate article regarding the primary source of the news first disclosed by the 2016 Yahoo Report over one month later on October 31, 2016, revealing more details regarding the actual provenance of the information. The *Mother Jones* article was written by David Corn, who co-authored the 2006 book *Hubris: The Inside Story of Spin, Scandal and the Selling of the Iraq War* (“*Hubris*”) with Mr. Isikoff. This article, entitled “A Veteran Spy Has Given the FBI Information Alleging a Russian Operation to Cultivate Donald Trump”, more correctly explained the following regarding the same primary source of information as the one inaccurately cited in Oath’s and Mr. Isikoff’s 2016 Yahoo Report:

“In June, the former Western intelligence officer—who spent almost two decades on Russian intelligence matters and who now works with a US firm that gathers information on Russia for corporate clients—was assigned the task of researching Trump’s dealings in Russia and elsewhere, according to the former spy and his associates in this American firm. ***This was for an opposition research project originally financed by a Republican client critical of the celebrity mogul. (Before the former spy was retained, the project’s financing switched to a client allied with Democrats.)***” (Emphasis added)

68. Mr. Isikoff is a seasoned journalist with decades of experience as a reporter who also wrote books on both U.S. foreign policy and the Clinton family over recent decades. Described as one of the most “high-profile writers” among Oath’s news brands⁴⁴, his prior writings demonstrate a deep understanding of the practical realities beneath the surface of U.S. domestic politics and national security. He holds a particular expertise in the role that Mr.

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https://en.wikipedia.org/w/index.php?title=Carter_Page&diff=797155868&oldid=740937003

⁴⁴ Joe Pompeo, “Can Oath, the Arranged Media Marriage of Yahoo and AOL, Avoid a Rough Divorce,” *Vanity Fair*, August 16, 2017. [<https://www.vanityfair.com/news/2017/08/oath-media-tim-armstrong-aol-yahoo-verizon-avoid-rough-divorce>]

Clinton, Mrs. Clinton and their associates played in that process as well as their personal modus operandi.

69. The summary of Mr. Isikoff's 1999 book *Uncovering Clinton: A Reporter's Story* published by Crown Publishing Group, a division of Penguin Random House, notes his specialty of "breaking" news at great personal expense to previously little-known or unknown private persons: "***Isikoff, who is credited with breaking the Paula Jones, Kathleen Willey and Monica Lewinsky stories, is universally acknowledged as the leading reporter who brought to light the incredible revelations about Clinton's personal and political lives that have consumed this country and shocked the world.***"⁴⁵ (Emphasis added)

70. Mr. Isikoff's own words in *Uncovering Clinton* reflect a high degree of awareness of the probable falsity of the sources used amidst his September 2016 attempt to again shock the world with the defamatory 2016 Yahoo Report about Dr. Page at the time of its publication by Oath subsidiaries Yahoo and HuffPost, as well as BBG's grantee RFE:

"What it all added up to, I wasn't sure. The benign view—the one held by Clinton's more sophisticated defenders who weren't still in denial—was not much: The guy liked women. So what? The more troubling reading—the one I leaned toward—was that the president's private weakness had led inexorably to much larger public wrongs: lies to the public and to a court, the smearing of innocents, the deployment of an army of hardball litigators, PRIVATE INVESTIGATORS and spin doctors whose primary purpose was to smash the accusers and destroy the President's enemies."⁴⁶ (Emphasis added)

71. Further underscoring Mr. Isikoff's rare depth of understanding of these related tactics and the individuals who exercised them as described and expounded upon throughout much of the book *Uncovering Clinton*, Mr. Isikoff described his principal focus as a journalist and an entertainer during the time leading up to its publication in 1999: "...for the past two years, I had carved out a far more entertaining sub-specialty: investigating allegations of improprieties involving Bill and Hillary Clinton."⁴⁷

72. Consistent with many of the same realities in 2016 which Mr. Isikoff described in his 1999 book, the main elements of the storyline in the 2016 Yahoo Report were either fabricated by employees of the Defendant or based primarily on unverified information as a method of assisting private investigators and spin doctors in smearing the innocent Dr. Page, as a way to smash and destroy the American citizens that the Clintons deemed as enemies (the "Clinton Public Wrongs Strategy").

⁴⁵ https://www.amazon.com/Uncovering-Clinton-Reporters-Michael-Isikoff/dp/0609603930/ref=tmm_hrd_swatch_0?encoding=UTF8&qid=&sr=

⁴⁶ Michael Isikoff, *Uncovering Clinton: A Reporter's Story*, New York: Crown, 1999. Kindle Edition.

⁴⁷ Ibid.

73. As publisher of these falsehoods across two of its prominent media brands, the false allegations distributed by Oath's subsidiaries and republished by RFE were so inherently improbable that only a reckless man and/or media organization would have put them in circulation. Likewise, further recklessness may be found given the inherently obvious reasons to doubt the veracity of the informants, including the private investigator Mr. Steele and the spin doctors from the Clinton Campaign whom he was hired to support, given the severe inaccuracy of these reports. With regards to the people who provided Yahoo with the so-called "intelligence reports", Mr. Isikoff perhaps better than most is well aware of dishonest information tactics that career politicians including the Clintons often play. As Mr. Isikoff described in his 1999 book on related subjects which he wrote while covering the Clintons for the *Washington Post* and *Newsweek*, private investigators smearing innocents cannot represent legitimate "intelligence reports" for even the most reckless of publishers and journalists.⁴⁸

74. Consistent with these acknowledged methodologies of smearing innocents through the deployment of private investors and spin doctors whose primary purpose was to smash and destroy those that the Clintons perceived as a threat, the Defendants created a substantial risk of serious bodily injury to Dr. Page by attempting or conspiring to destroy or damage Dr. Page's personal property within the United States, including but not limited to Dr. Page's reputation and relationships.

75. *Hubris* begins with a quote from "KARL KRAUS, AUSTRIAN JOURNALIST AND PRESS CRITIC (1874–1936)" that concisely alludes to the precise role that Oath assets played with Mr. Isikoff's dominant assistance in the most malicious defamatory attacks by the Defendants on Dr. Page that began with the 2016 Yahoo Report:

"How is the world ruled and how do wars start? Diplomats tell lies to journalists and then believe what they read."⁴⁹

76. Isikoff's *Hubris* book described the history of misinformation that facilitated the start of the 2003 Iraq War, based in part by a discredited September 2002 report⁵⁰ from London⁵¹ that became popularly known at the time as the Dodgy Dossier (the "2003 Dodgy Dossier"):

"...Blair took off for Tokyo. While his plane was in the air, ***a darker Iraq weapons drama—involving intelligence, the media, and leaks—played out to a tragic conclusion in England.***

(Emphasis added)

"Two days earlier, on July 15 [2003], the House of Commons foreign affairs committee had held a hearing to question David Kelly, a fifty-nine-year-old Oxford-educated microbiologist and former UN weapons inspector in Iraq, who

⁴⁸ Ibid.

⁴⁹ Michael Isikoff and David Corn, *Hubris: The Inside Story of Spin, Scandal, and the Selling of the Iraq War*, Crown/Archetype, Kindle Edition, 2006.

⁵⁰ <https://fas.org/nuke/guide/iraq/iraqdossier.pdf>

⁵¹ <http://image.guardian.co.uk/sys-files/Guardian/documents/2003/02/07/uk0103.pdf>

had served as senior adviser to the Ministry of Defence on WMDs. Weeks earlier, *Kelly had acknowledged to his superiors that he had spoken to BBC reporter Andrew Gilligan shortly before Gilligan broadcast the story charging that the Blair administration had “sexed up” its 2002 white paper on Iraq’s weapons by including the claim that Saddam could deploy chemical or biological weapons within forty-five minutes.* Kelly had had qualms about this allegation, but he maintained that he hadn’t told Gilligan that the dossier had been “sexed up.” Blair administration officials saw Kelly as a witness who could prove the BBC report was a fabrication, and they leaked word that he had been Gilligan’s source. (“It would fuck Gilligan if [Kelly] was his source,” Alistair Campbell, Blair’s communications chief, who had been in charge of the white paper’s production, wrote in his diary.) It was unclear, though, whether Kelly had been Gilligan’s main source. In any event, *Kelly became the center of a media frenzy.*

“At the hearing, *Kelly, a private man, looked nervous and uncomfortable* hunched over the witness table. Some MPs loudly demanded that he explain his dealings with Gilligan, hoping to discredit the BBC reporter. *MPs critical of the government suggested that Kelly was being unfairly used by Blair officials for their own political purposes. “Have you ever felt like a fall guy?” one MP asked him. “You have been set up, have you not?”* Kelly spoke so quietly that the MPs could barely hear him. And when asked if he had been Gilligan’s primary source, he said he didn’t think so. For years, Kelly had been a source for reporters on Iraq and weapons issues. But *after being dragged into the limelight, he told friends, he felt “physically sick.”* He had become a battering ram for both sides in England’s version of the Iraq WMD debate. *Two days after the hearing, he responded to a New York Times reporter who had e-mailed him offering encouragement. The reporter was Judith Miller. Kelly had been a source for her on WMD issues, and at 11:18 A.M. that Thursday, he sent her an e-mail that cryptically noted that there were “many dark actors playing games.”* He then thanked Miller for her support and friendship. It was the last e-mail Kelly ever sent.

“That afternoon, Kelly took a long stroll down a woodland path outside the village of Southmoor, where he lived. He walked atop a small mound, swallowed tablets of coproxamol, a prescription painkiller, and then slashed his left wrist with a knife. His body was found by police the next morning.”⁵²
(Emphasis added)

77. Three days after the 2016 Yahoo Report, the American political journalism company Politico published an interview featuring Jennifer Palmieri⁵³, former White House Director of Communications and Director of Communications for the Clinton’s Campaign (the “Palmieri Interview”). She repeated a fictional story that had been loyally distributed by Yahoo,

⁵² Isikoff and Corn, *Hubris: The Inside Story of Spin, Scandal, and the Selling of the Iraq War*, 2006.

⁵³ <http://www.politico.com/story/2016/09/full-transcript-jennifer-palmieri-228656>

other Oath subsidiaries and BBG's grantee RFE after many more responsible media institutions had refused to publish these outrageous lies. Her fictional allegations represent a similar situation to the prior dark drama that Mr. Isikoff described in *Hubris* a decade earlier which had also involved another "sexed up" white paper from London that placed another private man at the center of a sickening media frenzy:

PALMIERI: *Michael Isikoff had a piece yesterday about Carter Page, who is a foreign policy advisor of Trump's, and that he had met with someone from the Kremlin that--I mean, you know, according to Michael's reporting--*

THRUSH: Right.

PALMIERI: *--that U.S. intelligence officials believe is behind the hack. People--*

THRUSH: Right.

PALMIERI: *--like, this is the Russian Government interfering in our election--not just hacking but putting--releasing information, leaks that are timed to hurt us, evidence of messing with voting machines to impact the outcome. And whether it's to make Donald Trump win or whether it's to just--which I think is really terrifying--to undermine Americans' belief in our democracy. They want us to believe that we can't trust our democracy. They want to undermine the most fundamental principle of our country. It is--it's terrifying, and I think it's so scary that we can't even process it, but that is the moment--*

THRUSH: Why--

PALMIERI: *--when it occurred to me--*

THRUSH: Okay.

PALMIERI: *--like, that--it's like a Batman movie. I mean, that is--you know, it's--but it's reality, but that's how many different crazy story lines and villains and people who are involved.*

THRUSH: Why isn't it penetrating? The only enduring--

PALMIERI: I think it is starting to penetrate. I really do. I just hear it anecdotally. I hear it from--you hear people making jokes about Trump and Putin. You hear people saying, "Wow, this is really crazy." Or you know, what happens to me so much is somebody sends me an article and says, "Oh, my God"--like a friend of mine--"have you see this?" Like, "Yes, yes, we've seen this."

THRUSH: Right.⁵⁴

⁵⁴ Ibid.

(Emphasis added)

78. Part of the extensive relevant evidence discovered in other court proceedings of includes a May 18, 2017 statement from Mr. Steele's legal representative to the High Court of Justice Queen's Bench Division in the U.K. dated that allege the following: "The journalists initially briefed at the end of September 2016 by the Second Defendant (Steele) and Fusion at Fusion's instruction were from the New York Times, the Washington Post, Yahoo News, the New Yorker and CNN".⁵⁵ With the exception of Yahoo, none of the other media organizations that received these briefings rushed to publish the defamatory statements in such a way as may exhibit reckless disregard for the truth.

79. On or about 9:37 PM on October 19, 2016 during the third and final 2016 U.S. Presidential Debate at University of Nevada, Las Vegas, the Hillary for America Press office distributed to an extensive list of media contacts an email with the subject line: "15 Facts About Donald Trump's Deeply Unsettling Russia Problem And WikiLeaks"⁵⁶ (the "October Hillary for America Statement", attached as **Exhibit 10**). A total of 9 supporters of the Trump campaign were mentioned⁵⁷ in alleged "Fact" number 11 in the statement: "The Trump campaign's ties to Russia are deeply disturbing". While several of these supporters were also other peripheral unpaid volunteers like Dr. Page, the first of the 9 mentioned in the October Hillary for America Statement was Dr. Page. The primary foundation for making him the lead target was the 2016 Yahoo Report:

The Trump campaign's ties to Russia are deeply disturbing. One-time Foreign Policy Adviser Carter Page is being probed by U.S. intelligence agencies for meeting with sanctioned Kremlin officials including Igor Diveykin. "A former Russian security official, Diveykin now serves as deputy chief for internal policy and is believed by U.S. officials to have responsibility for intelligence collected by Russian agencies about the U.S. election, the Western intelligence source said."

80. According to the American advertising trade publication *Ad Week*: the "third and final debate between Hillary Clinton and Donald Trump brought in 71.6 million viewers, making it the third-most-watched debate ever".⁵⁸ By prominently emphasizing the defamatory 2016 Yahoo Report, including the fictional Oath article of September 23, 2016, as a highlighted web link and therefore substantially increasing internet traffic to the Yahoo website (increased "clicks"), the Hillary for America campaign partially and indirectly reciprocated for the invaluable

⁵⁵ <http://www.mcclatchydc.com/news/nation-world/national/article160622854.html>

⁵⁶ <https://www.hillaryclinton.com/briefing/factchecks/2016/10/19/15-facts-about-donald-trumps-deeply-unsettling-russia-problem-and-wikileaks/>

⁵⁷ Dr. Page, Paul Manafort, Michael Flynn, Mike McSherry, Rick Gates, Howard Lorber, Boris Epshteyn, Richard Burt, and Michael Caputo.

⁵⁸ <http://www.adweek.com/tv-video/presidential-debates-set-ratings-records-2016-does-format-need-change-174205/>

gift that this Verizon subsidiary had provided in support of her candidacy. Other media organizations with relatively higher levels of integrity including the *New York Times*, *Washington Post*, *Mother Jones*, and CNN which had met with Mr. Steele in September 2016 refrained from making these outrageous defamatory statements that were subsequently repeated by HuffPost and RFE, thereby forgoing the ill-gotten economic gains enjoyed by Oath. Besides for those new organizations which had been lured into the September 2016 meetings with Mr. Steele, additional journalists that had previously abstained from this breed of dishonest libel also included the *Wall Street Journal*, the *New York Times*, the *Washington Post*, CNN and others that had previously learned of these lies about Dr. Page from the Clinton Campaign as early as July 2016.

81. In *Hubris: The Inside Story of Spin, Scandal, and the Selling of the Iraq War*, Isikoff similarly describes Rocco Martino as a “Snitch who peddled phony documents”.⁵⁹

82. Further perpetuating many of these fundamental falsehoods on HuffPost’s Canadian media distribution arm, another Oath author further underscored the deceptive nature of the 2016 Yahoo Report in a posting on September 29, 2016 by Contributor Amica Graber (the “Graber Report”, attached as **Exhibit 11**)⁶⁰: “Putin personally owns 4.5 per cent of Gazprom, while the Russian government he helms owns 50 per cent of it. Carter Page has his own wealth invested in Gazprom and attends the annual investor meetings. Before Page’s resignation on Monday, Yahoo reported that U.S. intelligence officers were ‘looking into’ Page’s connections in Moscow after he flew there shortly before the RNC convention in Cleveland.” At the time of the publication, Dr. Page had no holding in Gazprom shares.

83. Approximately two months prior to the Defendants publishing the Defamatory Article and accompanying media campaign, an article entitled “Media Massacre” by another subsidiary under Oath regarding tactics explained the damage their subsequent actions by the plaintiff could create. It precisely described the exact techniques which would soon be used by Mr. Isikoff, other journalists from Oath subsidiaries and BBG grantee RFE, against Dr. Page (the “Media Massacre Tactics”). Cylvia Hayes’ blog posting published by HuffPost⁶² on July 16, 2017 (the “Hayes Report”) specifically stated that:

“...In order to try to capture ratings, clickbait-driven corporate media outlets rush to report on events ahead of, and in a more entertaining manner than, their competitors.

“I know from personal experience that **this mad rush to break the news often involves speculation and results in grievous misinformation and inaccurate reporting...**

⁵⁹ Michael Isikoff and David Corn, *Hubris: The Inside Story of Spin, Scandal, and the Selling of the Iraq War*, Crown/Archetype, Kindle Edition, 2006.

⁶⁰ Amica Graber, “Trump’s Russian Connections Explain His Climate Change Denial,” Huffington Post Canada, September 29, 2016. [http://www.huffingtonpost.ca/amyrose-lane/trump-russian-connection_b_12223494.html]

⁶² Cylvia Hayes, “Media Massacre,” Huffington Post, July 16, 2017. [http://www.huffingtonpost.com/cylvia-hayes/media-massacre_b_10998662.html]

“Also, in this social media age, news reporters, even big name reporters, rely more and more on tweets and posts from other reporters and from people near the scene. Quite simply, that is a completely unreliable source for factual news.

“In studying the phenomenon of public shaming in the digital age, most of the blame is placed on social media — Facebook and Twitter — and the regular people out there who decide to go after someone. But very often, as in this case of falsely accusing someone of being a possible murderer, the biggest culprit was corporate media and professional reporters. What gets too little attention is how the current clickbait-driven media model feeds and is fed by the social media mob.

“I now say, if you are watching ‘Breaking News’, beware! You are not being informed so much as entertained. You are watching speculation and emotional spin-doctoring. And, you probably like it because it is carefully constructed to get and hold our attention!

“As I’ve become all too aware of the incredible amount of inaccuracy, dishonesty and sensationalism in corporate, professional media, I have completely changed how I get my news. I now do my very best to avoid CNN, FOX, MSNBC etc. when they are in the ‘Breaking News’ mode or the spun-up, drawn out ‘analysis’ mode, which is actually just adding fuel to the fire to ring out every last bit of our attention span possible. I now rarely read, and always with a skeptical eye, corporate newspapers...

“I feel for the guy who was falsely accused, even if I may disagree with him... Once one media outlet puts out misinformation or lies about you, most of the rest repost it as fact and there is no way to get that genie back in the bottle. He’s been getting death threats and all sorts of anonymous hate-filled messages. He fears for his safety and that of his family. Scary, scary stuff...

“It’s true that Americans... are in danger of finding ourselves staring down the barrel of one of the countless guns our country is awash in. But as scary as that may be, I think a bigger threat is a news industry that shoots first and tries to pick up facts along the way.

“In this new norm, it isn’t news they’re breaking at all but the public trust and their sacred responsibility to inform us in a truthful, unbiased manner.”

“The media’s the most powerful entity on earth. They have the power to make the innocent guilty and to make the guilty innocent, and that’s power. Because they control the minds of the masses.”⁶³
(Emphasis added)

⁶³ Ibid.

84. In keeping with the Media Massacre Tactics, as defined on Oath subsidiary HuffPost's website, Dr. Page frequently experienced many of these same types of damages following publication of the 2016 Yahoo Report, the RFE/RL Republication, and the HuffPost Republication. As just one example of the countless physical threats including death threats that followed the malicious defamatory reports that were first distributed to the United States and to the world by the Defendants, Dr. Page received the following voicemail based on their groundless allegations regarding alleged meetings with the CEO of Rosneft and another Russian that Dr. Page has never met at any point in his life (approximate transcript below; confidential audio version of this recording is available for the Court upon request):

“Yo, what’s up man? Sounds like things are going pretty fucking good for you. Go to trade out your fucking country for some fucking Russian dollars. ***We know what the fuck you’ve been doing, you piece of shit mother fucker. You think you’re not, you know you’re not in fucking cahoots with fucking Rosneft*** and every fucking Russian oligarch over there? You fucking half-wit, fucking piece of shit. You deserve everything you fucking get. Every fucking thing you get. ***If it was up to me, after we fucking tried you for treason, we’d take you out in the street and beat the fucking piss out of you with baseball bats, you cock sucking mother fucker.*** Next time you turn your back on your fucking country, you’ll fucking regret it.”
(Emphasis added)

85. Consistent with the Media Massacre Tactics described by HuffPost's Hayes Report which explained how to “capture ratings, clickbait-driven corporate media outlets rush to report on events ahead of, and in a more entertaining manner than, their competitors”, Mr. Armstrong explained the strategy of increasing customer commerce in an article published nine days later by Oath's TechCrunch brand on July 25, 2016, entitled, “AOL's Tim Armstrong explains the Yahoo acquisition and what's next”:

One of the things that's interesting is that ***our business is split between the consumer-facing business and the advertising and publishing technology business. We want to reach 2 billion between those businesses combined.*** I do think, strategically, over a longer period of time, having access to the consumers directly will continue to be the most important driver of the value we can add to partners.

I think we'll end up with our brands, but bring the ability for other people to use our technology to help them build their own brands. That, at the core of this, is a huge part of the future outlook for the deal. ***We have to build really big consumer brands and we have to help other people build really big consumer brands.***
(Emphasis added)

BuzzFeed's Release of the Full 2016 Dodgy Dossier

86. On January 10, 2017, BuzzFeed Inc. (“BuzzFeed”) published an online article entitled, “These Reports Allege Trump Has Deep Ties To Russia”⁶⁴ (the “BuzzFeed Article”). This included a previously-undisclosed dossier (the “2016 Dodgy Dossier”) which repeated many of the primary false allegations from the 2016 Yahoo Report, the RFE Republication, the RFE Pre-Election Report, and the HuffPost Republication that had targeted Dr. Page as the principal falsely-accused suspect more than 100 days earlier and led to repeated media attacks in the intervening period. The 2016 Dodgy Dossier included various allegations concerning, among other things, the false allegations originally published by Oath subsidiaries and BBG’s grantee RFE regarding alleged meetings in 2016 between Dr. Page and sanctioned Russian officials which never actually occurred.

87. Contrary to the misrepresentations made by Oath brands and RFE/RL, Inc. in September 2016 with the initial publication of the 2016 Yahoo Report, the RFE Republication, the HuffPost Republication and associated articles by the Defendants, subsequent reporting and civil action following the BuzzFeed Article have proven that the 2016 Dodgy Dossier was compiled by a private security company and related briefings were made by the document’s principal author. The 2016 Dodgy Dossier was created as part of opposition research conducted during the 2016 election campaign in support of the Clinton Campaign; it has also been revealed that it is not an official document and was not created by any government entity. The revelation of extensive evidence in U.S. courts and international courts in 2017 proving these fact has made clear that most of the information regarding the provenance of the 2016 Yahoo Report’s sources was entirely misrepresented by the Defendants.

88. With respect to the Plaintiff, the 2016 Dodgy Dossier included extensive assertions of fact. Not a single portion of these statements (as it applies to Dr. Page) has any basis in fact whatsoever.⁶⁵ Although BuzzFeed’s decision to publish the unverified dossier flew in the face of journalistic standards and ethics, the reckless and wanton abuses by Yahoo, RFE, HuffPost, Mr. Isikoff and other employees of the Defendants were significantly more egregious as they focused on Dr. Page as the primary accused party.

89. BuzzFeed and their staff have claimed that they had the dossier in their possession for weeks prior to its publication, and have claimed that they had four reporters working near full-time on attempting to verify the claims made in the dossier, prior to publishing the BuzzFeed Article and the 2016 Dodgy Dossier.

90. BuzzFeed’s Editor-in-Chief Mr. Ben Smith (“Mr. Smith”) has admitted he knew at the time that it published the BuzzFeed Article and the 2016 Dodgy Dossier that there were “real solid reasons to distrust” the veracity of the allegations contained therein. No such admissions have been made by the Defendants or any of their representatives.

91. In addition, Mr. Smith published an Op-Ed in the *New York Times* and appeared in numerous television and radio interviews defending his decision to publish the BuzzFeed

⁶⁴ https://www.buzzfeed.com/kenbensinger/these-reports-allege-trump-has-deep-ties-to-russia?utm_term=.aqlNzE7OG#.mavxXNL3d

⁶⁵ <https://assets.documentcloud.org/documents/3259984/Trump-Intelligence-Allegations.pdf>

Article and the 2016 Dodgy Dossier. In his *New York Times* Op-Ed⁶⁶, Mr. Smith stated that BuzzFeed decided to publish the 2016 Dodgy Dossier “only after we had spent weeks with reporters in the United States and Europe trying to confirm or disprove specific claims.” No such efforts were made by the Defendants prior to or after their wanton and reckless attacks on Dr. Page.

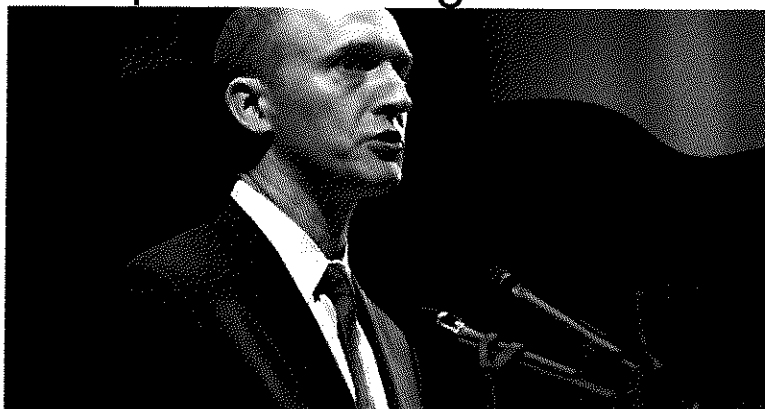
92. Similarly, Mr. Smith stated on CNN’s Reliable Sources that BuzzFeed was “running it down every way we could” and told MSNBC’s Meet the Press Daily that “we, like many other organizations had had [the 2016 Dodgy Dossier] for weeks. We had reporters in Europe and the United States trying to stand up or knock down specific details.” No such steps were taken by any of the Defendants, prior to publication of the 2016 Yahoo Report.

93. In an unfounded attempt to create false equivalency between the reckless publication of the 2016 Yahoo Report during the heat of the 2016 Presidential race as compared to the relatively more transparent report by BuzzFeed 63 days after the U.S. election which helped prove the error-ridden nature of the source, Mr. Isikoff again proudly retransmitted his September 23, 2016 report with the doctored photo of Dr. Page standing in front of a Russian flag via Twitter⁶⁷ at 7:41 pm on January 10, 2017. BuzzFeed subsequently faced an onslaught of criticism for their decision to publish the unverified 2016 Dodgy Dossier and the associated article – drawing condemnation from media outlets and journalism experts across the political spectrum including The Washington Post, CNN, MSNBC, and Fox News to name a few. This tweet was also sent prior to the filing of multiple lawsuits which took civil action against this reporting by BuzzFeed:

Michael Isikoff

@Isikoff

The first reporting on the FBI probing the Trump/Russia allegations was last September



⁶⁶ <https://www.nytimes.com/2017/01/23/opinion/why-buzzfeed-news-published-the-dossier.html>

⁶⁷ <https://twitter.com/Isikoff/status/819026449243996161>

U.S. intel officials probe ties between Trump adviser and Kremlin

Carter Page speaks at the graduation ceremony for the New Economic School in Moscow in July. U.S. intelligence officials are seeking to determine whether an Am...

yahoo.com

7:41 PM - 10 Jan 2017

94. The following day, in an article published by Yahoo⁶⁸ on January 11, 2017 (the “2017 Yahoo Report”), Mr. Isikoff wrote another highly misleading statement that further exacerbated the damage already created by Oath assets throughout the prior six months:

“Another of Steele’s reports, first reported by Yahoo News last September, involved alleged meetings last July between then-Trump foreign policy adviser Carter Page and two high-level Russian operatives, including Igor Sechin — a longtime associate of Russian President Vladimir Putin who became the chief executive of Rosneft, the Russian energy giant. After initially declining to comment, Page wrote a letter to FBI Director James Comey after the story was published denying that he had ever met with Sechin; the Trump campaign, however, cut its ties to him.”
(Emphasis added)

95. Contrary to the 2017 Yahoo Report, Dr. Page was never given any advanced warning that these extremely malicious and destructive falsehoods would be published by Yahoo on September 23, 2016 in support of the Clinton Campaign. Dr. Page had consistently tried to avoid media exposure prior to the initial publication of the 2016 Yahoo Report to the greatest extent possible in an attempt to protect his privacy and avoid any actions which would inadvertently thrust himself to the forefront of the national debate regarding the alleged cyberattacks or any other public controversy. If Mr. Isikoff had forewarned Dr. Page of these forthcoming falsehoods rather than leaving two general voicemails without any reference to the intended nature of the forthcoming Media Massacre tactics and been afforded the opportunity to prevent the severe damage that this defamation of unprecedented scale would inevitably create, the Plaintiff would have certainly tried to relieve Mr. Isikoff of this false information from Mr. Steele by confirming “on background” that these meetings had never occurred.

96. By distinguishing between the false allegations regarding the alleged meetings with Mr. Sechin and Mr. Divyekin in the 2017 Yahoo Report, Mr. Isikoff’s further misrepresentation of Dr. Page’s September 25, 2016 FBI Letter created additional damage by thereby implying that the alleged meeting with Mr. Divyekin might have actually occurred. Contrary to the 2017 Yahoo Report, the FBI letter stated explicitly that Dr. Page had “not met

⁶⁸ Michael Isikoff, “The British ex-spy behind the Trump dossier was an FBI asset,” Yahoo News, January 11, 2017 [<https://www.yahoo.com/news/the-man-behind-the-trump-dossier-was-former-british-spy-004221154.html>]

this year with any sanctioned official in Russia”. This letter had been published in its entirety⁶⁹ on September 26, 2016, by the *Washington Post*, as an internet link included in an article entitled “Trump’s Russia adviser speaks out, calls accusations ‘complete garbage’”.⁷⁰ By incorrectly citing the FBI Letter in the 2017 Yahoo Report, Mr. Isikoff made clear that he was aware of this document.

97. In one of the most recent of 5,348 reader reactions posted to the 2016 Yahoo Report as of in or about July 2017, Yahoo account user “Sir.Dennis” correctly noted the following:



Sir.Dennis 2 months ago

We now know this reporting came directly from a briefing Isikoff had in September of 2016 with Christopher Steele, the creator of the now discredited Russian dossier. This meeting with Isikoff by Fusion GPS on behalf of a Hillary Clinton operative.⁷¹

**HuffPost’s Media Massacre Tactics
and the HuffPost Defendant Oeuvre**

98. On June 21, 2016, Oath’s HuffPost published a report by HuffPost Foreign Affairs Reporter Jessica Schulberg that defamed Dr. Page with a significant array of falsehoods and innuendo (the “Schulberg Report”⁷², attached as **Exhibit 12**). The Schulberg Report’s incendiary misrepresentations begin with a defamatory title: “A Trump Adviser Once Compared Sanctions Against Russia To Police Killing Black Men”.

99. Dr. Page’s *Global Policy Journal* article of January 5, 2015 which never made any comparison of “sanctions against Russia to police killing black men”, was entitled: “No Justice, No Nuclear Peace: Weapons of Mass Destruction in an Age of Inequity” (the “Nuclear

⁶⁹ https://www.washingtonpost.com/r/2010-2019/WashingtonPost/2016/09/26/Editorial-Opinion/Graphics/2016.09.25_FBI_letter.pdf

⁷⁰ <https://www.washingtonpost.com/news/josh-rogin/wp/2016/09/26/trumps-russia-adviser-speaks-out-calls-accusations-complete-garbage/>

⁷¹ <https://www.yahoo.com/news/u-s-intel-officials-probe-ties-between-trump-adviser-and-kremlin-175046002.html>

⁷² http://www.huffingtonpost.com/entry/trump-carter-page-russia-sanctions-black-lives_us_5769bf64e4b065534f482504

Peace Journal Article”⁷³, attached as **Exhibit 13**). In this obscure blog posting Dr. Page on the *Global Policy Journal* website which received no meaningful recognition before the libelous Schulberg Report, he noted with concern that “the loss of Michael Brown and Eric Garner has received **intense media coverage** and perfunctory federal government **investigations**”. This sentence in the Nuclear Peace Journal Article included a link to a *Washington Post* opinion article of December 4, 2014 by Professor Paul Cassell, entitled: “Will the Justice Department expeditiously investigate Eric Garner’s death? Mike Brown’s?” The author Professor Cassell “teaches criminal law, criminal procedure, and crime victims’ rights at the S.J. Quinney College of Law at the University of Utah. He also served as a U.S. District Court Judge for the District of Utah from 2002 to 2007.” It concludes that: “**The Justice Department should live up to the attorney’s general’s promise yesterday to ‘expeditiously’ announce its decision on whether charges are appropriate in the Eric Garner death ... and in the Michael Brown and Trayvon Martin deaths.**”⁷⁴

100. Among other complete falsehoods included within HuffPost’s defamatory Schulberg Report, it incorrectly claimed that Dr. Page is, “One of Donald Trump’s main sources of information on foreign affairs.”⁷⁵ Dr. Page has never met Mr. Trump and has never served as one of the main sources of information for him on any topic. The Plaintiff had previously volunteered as an informal, unpaid volunteer member of one of the Trump Campaign’s foreign policy committees, but was thwarted in his effort to making any meaningful contribution due in part to the defamatory articles by Oath.

101. In this obscure academic work by the Plaintiff which received no meaningful public commentary or recognition before HuffPost’s highly defamatory Schulberg Report of June 2016, Dr. Page opined with concern that “no lenience for minor offenses represented a complete lack of justice” and that “Eric Garner was brutally accosted for the petty crime of selling cigarettes”.

102. The Schulberg Report concludes with a misleading annotation: “Editor’s note: Donald Trump regularly incites political violence and is a serial liar...” The false, defamatory Schulberg Report article published by HuffPost contributed to the long sequence of untruths by Oath that contributed to the incitement of political violence and threats against Dr. Page.

103. On July 19, 2016, HuffPost Foreign Affairs Reporter Akbar Shahid Ahmed and HuffPost Washington Bureau Chief Ryan Grim published an innuendo-laced defamatory report entitled “The Real Winner At The GOP Convention Is Vladimir Putin” (the “Grim Report”⁷⁶, attached as **Exhibit 14**). With the exception of the Grim Report’s correct assertion that Dr. Page

⁷³ <http://www.globalpolicyjournal.com/blog/05/01/2015/no-justice-no-nuclear-peace-weapons-mass-destruction-age-inequity>

⁷⁴ <https://www.washingtonpost.com/news/volokh-conspiracy/wp/2014/12/04/will-the-justice-department-expeditiously-investigate-the-eric-garner-case-or-the-mike-brown-case/>

⁷⁵ http://www.huffingtonpost.com/entry/trump-carter-page-russia-sanctions-black-lives_us_5769bf64e4b065534f482504

⁷⁶ http://www.huffingtonpost.com/entry/gop-trump-russia_us_578e44bae4b0a0ae97c37acd

was not well-known before the 2016 Yahoo Report, most of the statements published by Oath regarding the Plaintiff by Mr. Ahmed and Mr. Grim are entirely false: “a less well-known figure with even more direct influence over Trump’s foreign policy: energy executive Carter Page. A speech he gave this month in Moscow revealed that he’s mastered Putin-speak, with its focus on U.S. hypocrisy abroad, the futility of talking about ‘human rights’ and the way America is faltering at home.”

104. Unlike Oath’s CEO Mr. Armstrong who oversaw and introduced the Oath Clinton Documentary as well as Mrs. Armstrong who served as Producer and Director of Outreach at Oath subsidiary MAKERS, the brand which managed the Oath Clinton Documentary, Dr. Page has never met Mr. Trump and was never able to meaningfully contribute in any way to the Trump Campaign due to these and other defamatory attacks.

105. Contrary to the Grim Report, Dr. Page’s NES Commencement Address and the NES Academic Lecture were in no way focused “on U.S. hypocrisy abroad, the futility of talking about ‘human rights’ and the way America is faltering at home”. In every way, this statement in the libelous Grim Report written by HuffPost’s Washington Bureau Chief and a HuffPost Foreign Affairs Reporter, published by Oath subsidiary HuffPost, of and concerning Dr. Page is false and defamatory. The Grim Report’s reckless disregard for the truth regarding the actual content of the NES Academic Lecture would once again be subsequently repeated two months later amidst similar allegations in the defamatory 2016 Yahoo Report.

106. An August 12, 2016 report by HuffPost Reporter Daniel Marans entitled “When It Comes To Donald Trump’s Russia Ties, It’s All About The Aides” (the “Marans Report”⁷⁷, attached as **Exhibit 15**) libelously repeated one of the central malicious claims of the Schulberg Report by writing that Dr. Page “compared U.S.-led sanctions against Russia to police killings of unarmed black men in the U.S.” in the Nuclear Peace Journal Article.

107. While the Marans Report included HuffPost’s standard disclaimer at the bottom of the article regarding the incitement of political violence, the actual conclusion of the Nuclear Peace Journal Article focused not on sanctions but rather on how “a lack of foresight led to... officials displaying a narrow-minded disregard for the repercussions of their actions. The increased nuclear tensions in the U.S.-Russia relationship which will be considered later in this article stand as a principal and perhaps the most ominous example.” Unlike Dr. Page’s NES Commencement Address and the NES Academic Lecture which was focused on the concept of mutual respect, the Marans Report further contributed to Oath’s long-term impact of inciting political violence as Dr. Page has frequently experienced in the months since the 2016 Yahoo Report, the HuffPost Republication and the RFE Republication.

108. In addition to repeating other primary false claims of Oath’s libel from the 2016 Yahoo Report, the HuffPost Republication of September 25, 2016 by HuffPost Congressional Reporter Matt Fuller accentuated the falsehoods in a report entitled: “Trump Campaign: That

⁷⁷ http://www.huffingtonpost.com/entry/was-trump-putins-fool-his-partner-in-crime_us_58d406fce4b099c777b9dfdc

Adviser Reportedly Talking With Russian Officials Isn't An Adviser Anymore"⁷⁸. The HuffPost Republication showed a particularly reckless disregard for the truth by repeating the false claim that Dr. Page had previously volunteered as an "*informal foreign adviser*"... rather than a "*informal foreign policy adviser*"⁷⁹ as originally reported by the *Washington Post*. (Emphasis added)

109. A February 16, 2017 HuffPost article by HuffPost Contributor Brad Schreiber entitled "Douglas Valentine's CIA vs. Donald Trump's CIA" (the "Schreiber Report"⁸⁰, attached as **Exhibit 16**) falsely claims: "In an effort to battle the fallout from campaign advisors Paul Manafort, Roger Stone and *Carter Page having been caught by the CIA and NSA for collusion with Russian intelligence officers*, Trump has announced his intention to have billionaire Stephen Feinberg, co-founder of Cerberus Capital Management, oversee a broad review of this nation's intelligence agencies." (Emphasis added)

110. A March 21, 2017 HuffPost article by HuffPost Contributor Michael Winship, entitled "There's a Smell of Treason in the Air" (the "Winship Report"⁸¹, attached as **Exhibit 17**) Mr. Winship denies the wiretapping allegations by Mr. Trump. The Winship Report continues Oath's pattern of highly injurious personal attacks: "Roger Stone or Carter Page, two of the Trump/Russia story's most prominent and tawdry players."

111. Further underscoring Oath's pattern of malice, a libelous article first published by HuffPost on March 23, 2017 and written by HuffPost Contributor Jennifer Sabin and entitled "All The President's Traitors" (the "Sabin Report"⁸², attached as **Exhibit 18**), refers to "...lying Carter Page..."

112. In another defamatory statement completely devoid of fact published by HuffPost Contributor Richard North Patterson and in an article published March 24, 2017 (the "Patterson Report"⁸³, attached as **Exhibit 19**), Mr. Patterson claimed that: "Trump foreign policy adviser Carter Page met with the omnipresent envoy [Russian Ambassador Sergey Kislyak] at the GOP convention, just before Trump operatives stripped the party platform of a pledge to aid Ukraine against Russian aggression."⁸⁴ Contrary to the false and defamatory libel published by the Oath

⁷⁸ http://www.huffingtonpost.com/entry/trump-campaign-russia-carter-page_us_57e7eb59e4b0e80b1ba299b9

⁷⁹ https://www.washingtonpost.com/business/economy/trump-advisers-public-comments-ties-to-moscow-stir-unease-in-both-parties/2016/08/05/2e8722fa-5815-11e6-9aee-8075993d73a2_story.html

⁸⁰ http://www.huffingtonpost.com/entry/douglas-valentines-cia-vs-donald-trumps-cia_us_58a615cae4b0b0e1e0e20877

⁸¹ http://www.huffingtonpost.com/entry/theres-a-smell-of-treason-in-the-air_us_58d1837ee4b0537abd957598

⁸² http://www.huffingtonpost.com/entry/theres-a-smell-of-treason-in-the-air_us_58d1837ee4b0537abd957598

⁸³ http://www.huffingtonpost.com/entry/was-trump-putins-fool-his-partner-in-crime_us_58d406fce4b099c777b9dfdc

⁸⁴ *Ibid.*

subsidiary regarding the Plaintiff, Dr. Page arrived on Delta flight 5353 at Cleveland Hopkins International Airport at 1:36 pm on July 18, 2016, the same day that the *Washington Post* published the following report: “Trump campaign guts GOP’s anti-Russia stance on Ukraine”.⁸⁵ (Delta Air Lines flight confirmation attached as **Exhibit 19 (a)**) Dr. Page played no role whatsoever in the drafting of the 2016 Republican party platform.

113. A HuffPost article dated March 27, 2017 and written by HuffPost Contributor Peter Lance was entitled “Why Is A Dairy Farmer With No Intel Experience The House Intelligence Committee Chairman?” (the “Lance Report”⁸⁶, attached as **Exhibit 20**) cited, “a question from Mother Jones D.C. Bureau Chief David Corn, who asked him if he’d ever heard of *now infamous Russia-connected Trump associates Carter Page...*”⁸⁷ (Emphasis added) Infamous is defined by Merriam-Webster’s dictionary as: “having a reputation of the worst kind.”⁸⁸ The core source of infamy for Dr. Page stems directly from the complete falsehoods first published in the 2016 Yahoo Report six-months earlier by another Oath affiliate, Yahoo News. Contrary to the defamatory statement, David Corn instead simply asked: “You haven’t heard of Carter Page...?... You’ve not heard of Carter Page...?”⁸⁹

114. An article published on April 6, 2017 by HuffPost and written by HuffPost Contributor Donna Kassin was entitled: “What Would Trump’s Deposal Mean For Democrats — And Are They Ready?” (the “Kassin Report”⁹⁰, attached as **Exhibit 21**) The Kassin Report wrongly claims: “Donald Trump and his sycophantic enablers like campaign adviser Carter Page continue to deny the allegations...” The falsity of the defamatory Kassin Report published by HuffPost is readily apparent in the definition of the term “enabler”. According to Cambridge Dictionary, the word enabler means “something or someone that makes it possible for a particular thing to happen or be done”.⁹¹ Unlike Oath’s Mr. Anderson who met and provided material support to the Mrs. Clinton’s campaign, Dr. Page has never met Mr. Trump and has never enabled him to do anything. Due to the defamation by Oath subsidiaries and RFE, loyal American citizen Dr. Page was prevented from remaining involved in the 2016 U.S. election due to the life-threatening attacks of the the 2016 Yahoo Report, the RFE Republication, the HuffPost Republication and other malicious false stories from Oath subsidiary HuffPost.

115. A May 10, 2017 report published by HuffPost and written by HuffPost Contributor David Simon was entitled “‘Tuesday Night Massacre’ Is Trump’s Most Brazen Act

⁸⁵ https://www.washingtonpost.com/opinions/global-opinions/trump-campaign-guts-gops-anti-russia-stance-on-ukraine/2016/07/18/98adb3b0-4cf3-11e6-a7d8-13d06b37f256_story.html

⁸⁶ http://www.huffingtonpost.com/entry/lemmings-with-suicide-vests-how-did-a-dairy-farmer_us_58d831cde4b0c0980ac0e756

⁸⁷ http://www.huffingtonpost.com/entry/lemmings-with-suicide-vests-how-did-a-dairy-farmer_us_58d831cde4b0c0980ac0e756

⁸⁸ <https://www.merriam-webster.com/dictionary/infamous>

⁸⁹ <https://twitter.com/kylegriffin1/status/843947131241226240?lang=en>

⁹⁰ http://www.huffingtonpost.com/entry/what-would-trumps-deposal-mean-for-democrats-and_us_58e13870e4b0d804fbbb740e

⁹¹ <http://dictionary.cambridge.org/us/dictionary/english/enabler>