

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Chinese Americans Civil Rights Coalition, Inc.

Plaintiff

Case No.: **1:21-cv-04548**

-against-

COMPLAINT

Donald J. Trump
in his former official capacity as
the President of the United States, and as a private citizen

Defendant

COMES NOW Plaintiff in the above styled action and respectfully shows this Honorable Court
as follows:

THE PARTIES

That the Plaintiff is a non-profit organization registered in the state of New York representing numerous
individuals and community organizations in this legal action.

This Complaint is filed against the named Defendant in his former official capacity as the President of
the United States for his defamatory slanders and libel since the outbreak of COVID-19 pandemic, and
as a private citizen for continuingly making defamatory statements since he left the White House on Jan.
20, 2021.

TABLE OF CONTENTS

	Page
The Parties	1
Table of Contents.....	2
Table of Authorities	3
Jurisdiction.....	3
The Complaint	4
Statement of Facts.....	6
The Fallacy and Double-Standard of Naming Diseases and Virus	6
The Timeline Since the COVID-19 Outbreak – The Scientific and Medical Community	7
The Timeline Since the COVID-19 Outbreak – Defendant and His Administration.....	10
A Partial List of Defendant’s Defamatory Statements	13
The Significant Increase in Anti-Asian Americans Incidents	24
The Legal Definition of Defamation	31
The Supreme Court Precedents	31
Defendant’s Statements are Not True	32
Defendant’s Pattern of Disregarding Science	33
Defendant’s Pattern of Spreading Falsehood	34
Defendant’s Pattern of Misleading and Self-contradictory Statements	35
Defendant’s Pattern of Showing Negligence	36
Defendant’s Pattern of Committing Actual Malice	37
Connection Between Hateful Rhetoric and Real-World Violence	39
Defendant’s Statements Have High Impact	41
The First Amendment Does Not Apply in this Case	43
The Sovereignty & Presidential Immunity Do Not Apply in this Case	45
Defendant’s Defamatory Statements were Made with no Privilege	47
Count One – Defamation Per Se.....	47
Count Two - Intentional Infliction of Emotional Distress.....	48
Count Three - Negligent Infliction of Emotional Distress	50
Prayer for Relief	51
Jury Demanded	52
Exhibit A: Comparison of COVID-19 Record the United States v. Asian Countries	53

TABLE OF AUTHORITIES

Cases	Page
<i>Clinton v. Jones</i> , 520 U.S. 681 (1997).....	45
<i>Gertz v. Robert Welch, Inc.</i> , 418 U.S. 323 (1974).....	31
<i>New York Times Co. v. Sullivan</i> , 376 U.S. 254 (1964).....	31
<i>Nixon v. Fitzgerald</i> , 457 U.S. 731 (1982).....	45
<i>Trump, Donald J. v. Vance, Cyrus R., et al.</i>	45
<i>United States v. Nixon</i> , 418 U.S. 683 (1974).....	45
 Statutes	 Page
28 U.S.C. § 1332(a)(1)	3
28 U.S.C. § 4101(1).....	3

JURISDICTION

The Plaintiff is a non-profit social advocacy organization incorporated in the State of New York, and the Complaint concerns a defamation case. The defendant is a resident and citizen of the State of Florida. This Court has jurisdiction under 28 U.S.C. § 4101 (1) for this defamation case and under 28 U.S.C. § 1332 (a)(1) because the case involves parties of diverse citizenship.

THE COMPLAINT

1. Defendant took the oath of office at noon Jan. 20, 2017 and held the most powerful office in the country until noon Jan. 20, 2020. This office has always come with the inherited duty and responsibility for every incumbent since Washington.
2. Since March 16, 2020 and as recently as on March 16, 2021, Defendant has repeatedly used the terms such as “Chinese virus”, “China virus”, “Wuhan virus”, “Kung Flu virus” (hereafter referred to as Defendant’s Statements) in his official capacity in tweets, interviews, campaign rallies and even press briefings at the White House, and continued doing so after he left office.
3. Defendant justified his repeated use of defamatory statements by insisting “because it comes from China...I want to be accurate.” Hence Defendant announced unequivocally to the world that he has used these words as factual statements rather than opinions. Defendant’s press secretary, DOJ officials and the federal courts have all affirmed Defendant’s tweets were official statements.
4. However, Defendant’s these words are not supported by the known facts that (1) the zoonotic virus is not originated from human, (2) it transmits from one person to another regardless of gender, age, race, and ethnicity, and (3) according to the World Health Organization (WHO) reports and the Centers for Disease Control and Prevention (CDC) bulletins, the origin of the virus was unknown when Defendant used these words the first time on March 16, 2020, and still remains unknown on March 16, 2021 when Defendant repeated it again.
5. Had Defendant really wanted to be accurate, the accurate statement would have been “the first outbreak of the COVID-19 occurred in China.” Nevertheless, Defendant’s intention was never about the truth because on multiple occasions he said the virus “has 19 / 20 / 22 different names”, and “whatever you want to call it.”
6. Meanwhile, Defendant has stubbornly disregarded (1) the official terminology and guidelines for the coronavirus established by the WHO, and (2) the advices by the scientific and medical community,

public discussions, even officials in his own administration not to use such inflammatory terms because of its potential damaging effect.

7. Furthermore, Defendant has always bragged about the fact that he has one of the largest group of followers as many as 100 million people (e.g. [an interview with Tucker Carlson of Fox News reported by the Guardian 03/15/2017](#)), and he has been fully aware of the high impact of his words on his followers. However, Defendant has irresponsibly ignored the growing evidence that racial insults and attacks on Chinese/Asian Americans community have increased since the outbreak of the pandemic, and particularly since his repeated use of such inflammatory phases.
8. Duty comes with authority. Responsibility comes with power. Holding the most powerful office in the country, Defendant reckless neglected his official duty to represent all Americans, and maintain justice, domestic tranquility, and general welfare for all communities, Whites, Blacks, Hispanic, Asian, Native Americans, and so on. The presidential immunity shall not apply in this case because making defamation statements against one group of citizens is not part of official duty and the Constitution has never enumerated such power.
9. The truth matters, words have consequences... especially from those in powerful and influential positions. Against the well-published WHO guidelines and the repeated advices from health officials of his own administration, Defendant intentionally repeated those defamatory words to serve his own personal and political interest with astonishing level of actual malice and negligence, hence severely injuring the Chinese/Asian Americans communities in the process. If this case does not rise to the level of defamation by an individual holding the most powerful office with the most solemn responsibility for all Americans, then nothing does.
10. Plaintiff on behalf of its members brings this lawsuit to repudiate Defendant's defamation, to defend its community's civil rights against racial discrimination of all forms and shapes, and to demand apology and indemnity from Defendant to the Chinese/Asian American communities in the United States.

STATEMENT OF FACTS

The Fallacy and Double-Standard of Naming Diseases and Virus

11. According to a February 2019 study by University College London published in the journal *Quaternary Science Reviews*, prior to Columbus's arrival in the Americas in 1492, the area boasted thriving indigenous populations totaling to more than 60 million people. A little over a century later, that number had dropped close to 6 million. European contact brought with it not only war and famine, but also diseases like smallpox that decimated local populations. Those deaths occurred on such a large scale that they led to a "Little Ice Age": an era of global cooling between the 16th and mid-19th century. ([BusinessInsider 02/19/2019](#)) However, these diseases were never named "European".
12. The "Spanish Flu" was named as such because at the time only the Spanish media was free to report the flu and its deadly impact, while other European countries suppressed such news to avoid affecting morale during the WWI. The general consensus is the "Spanish Flu" unlikely originated in Spain, its source remains unknown. France, China and Britain have all been suggested as the potential birthplace of the virus, as has the United States, where [the first known case](#) was reported at a military base in Kansas on March 11, 1918. ([History.com 01/12/2016](#))
13. The 2009-2010 H1N1 Flu that the CDC says was first recorded in the U.S. didn't become the "American flu." Instead, it gained the misleading name "swine flu" because scientists at first thought it was similar to viruses that occur in North American pigs, although further testing has complicated this theory. Much of the media coverage around this flu emphasized that it may have come from Mexico, which had by then become the focus of American immigration anxiety. ([Time 03/19/2020](#))
14. On May 8, 2015, the [World Health Organization](#) (WHO) warned against giving outbreaks geographic or national labels in order "to minimize unnecessary negative effects on nations, economies and people." Dr Keiji Fukuda, Assistant Director-General for Health Security, said, "This may seem like a trivial issue to some, but disease names really do matter to the people who are directly affected. We've seen certain disease names provoke a backlash against members of

particular religious or ethnic communities, create unjustified barriers to travel, commerce and trade, and trigger needless slaughtering of food animals. This can have serious consequences for peoples' lives and livelihoods.”

The Timeline Since the COVID-19 Outbreak – The Scientific and Medical Community

15. [According to the WHO's timeline](#), on Dec. 31, 2019, China reported a cluster of cases of pneumonia in Wuhan, Hubei Province.
16. On Feb. 11, 2020, the World Health Organization announced an official name “COVID-19” for the new virus.
17. [On Mar. 2, 2020 the WHO](#) urged the public not to call it a “Wuhan virus,” “Chinese virus” or “Asian virus,” and to use the official term “COVID-19” for the disease which was deliberately chosen to avoid stigmatization, and called “the stigma is more dangerous than the virus itself.”
18. On Mar. 10, 2020, the Centers for Disease Control and Prevention director Dr. Robert Redfield testified in the House that attaching Chinese to a description of the coronavirus was wrong after both Defendant and the top House Republican were accused of racism for labeling it. When questioned by Rep. Lois Frankel (D-Fla.) that “It’s absolutely wrong and inappropriate to call this the Chinese coronavirus, I assume you would agree with that.” Dr. Redfield replied “yes.” When asked if he was aware of evidence that a physical barrier on US borders would help stop the illness, he replied: “Not that I’ve seen.” ([BusinessInsider 03/11/2020](#))
19. On Mar. 19, 2020, Mike Ryan, an official with the World Health Organization (WHO) again warned against referring to COVID-19 as the “Chinese virus,” saying that it could lead to racial profiling against Asians when “there is no blame in this.” Ryan noted that a pandemic of influenza in 2009 originated in North America but “we don’t call it the North American flu.” ([The Hill 03/19/2020](#))
20. The CDC’s Bulletin as of Sep. 1, 2020 shows, COVID-19 is a new disease, caused by a novel coronavirus that has not previously been seen in humans. Animal coronaviruses rarely infect people

and then spread between people. This occurred with two earlier coronaviruses, MERS-CoV and SARS-CoV. SARS-CoV-2 virus is a beta coronavirus, like MERS-CoV and SARS-CoV. These viruses have their origins in bats. Although we do not know the exact source of the current outbreak of COVID-19, we know that it originally came from an animal, likely a bat. The sequences from U.S. patients are similar to the one that China initially posted, suggesting a likely single, recent emergence of this virus from an animal reservoir. ([CDC Bulletin 09/01/2020](#))

Source of the Virus

Coronaviruses, named for the crown-like spikes on their surfaces, are a large family of viruses that are common in people and many different species of animals, including camels, cattle, cats, and bats. There are many [types of human coronaviruses](#), including some that commonly cause mild upper-respiratory tract illnesses. COVID-19 is a new disease, caused by a novel (or new) coronavirus that has not previously been seen in humans.

Animal coronaviruses rarely infect people and then spread between people. This occurred with two earlier coronaviruses, [MERS-CoV](#) and [SARS-CoV](#).

SARS-CoV-2 virus is a beta coronavirus, like MERS-CoV and SARS-CoV. These viruses have their origins in bats. Although we do not know the exact source of the current outbreak of COVID-19, we know that it originally came from an animal, likely a bat. The sequences from U.S. patients are similar to the one that China initially posted, suggesting a likely single, recent emergence of this virus from an animal reservoir.



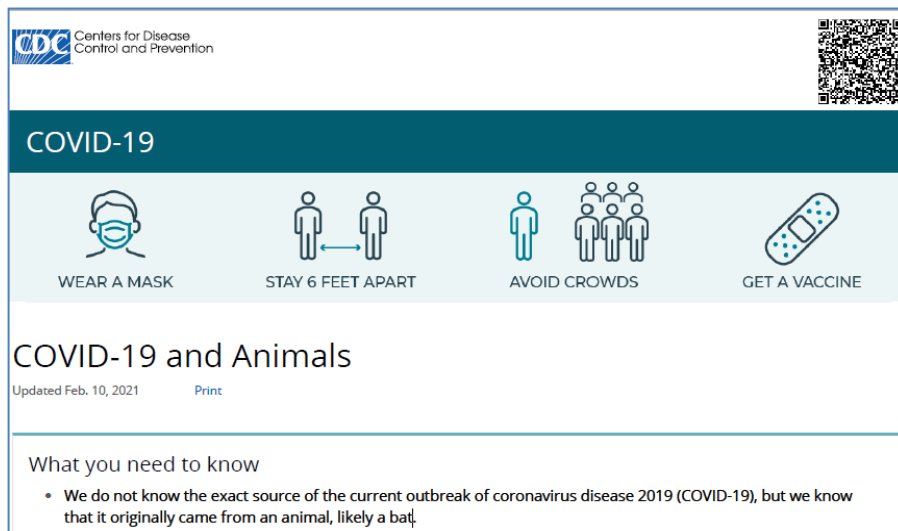
Last Updated Sept. 1, 2020
Content source: National Center for Immunization and
Respiratory Diseases (NCIRD), Division of Viral Diseases

<https://www.cdc.gov/coronavirus/2019-ncov/cdcresponse/about-COVID-19.html>

21. According to a [Mount Sinai study](#) dated June 2, 2020, New York City's first confirmed COVID-19 cases predominately arose through untracked transmission between the United States and Europe, with limited evidence to support any direct introductions from China. As aforementioned, a pandemic of influenza in 2009 started in North America but we don't call it the North American flu.
22. On Feb. 9, 2021, the international scientists held a joint press conference with their Chinese counterparts on February 9, announcing preliminary WHO-China joint study findings that supported the natural outbreak theory, legitimized the claim that the novel coronavirus could have reached China through imported frozen food, and discarded the hypothesis that the virus had escaped from a laboratory. The same findings, however, convinced critics of the Chinese government that the investigation was neither independent nor transparent. In a statement issued on February 13, U.S.

National Security Adviser Jake Sullivan expressed “deep concerns” about how the scientists had reached and communicated their findings. ([Foreign Affairs 03/31/2021](#))

23. The Feb. 10, 2021 CDC Bulletin reads: “We do not know the exact source of the current outbreak of coronavirus disease 2019 (COVID-19), but we know that it originally came from an animal, likely a bat.”



24. On Mar. 19, 2021, NPR reported “Next Pandemic: Scientists Fear Another Coronavirus Could Jump from Animals to Humans”. First, in finding the origin of the COVID-19, scientists found the virus jumped from a bat into humans. Now, scientists are worried that another coronavirus will strike again, from either a bat or some other animal. “Coronaviruses are under our feet in rodents. They are above our heads in bats. We live in a kind of coronavirus world,” says virologist Edward Holmes at the University of Sydney. Holmes and his team found that the bats harbored 24 new coronaviruses, including four closely related to the virus that causes COVID-19, or SARS-CoV-2, and three viruses closely related to SARS-CoV, which caused a smaller outbreak back in 2003. In addition, the bat species carrying these viruses are common across most of Southeast Asia. And depending on how you define a virus species, Holmes says, there are likely thousands of different coronaviruses all around the world. And these pathogens aren't just hanging out in bats. Many types of animals carry these viruses, including dogs, cats, birds, chickens, pigs and rodents. Now the two big questions are:

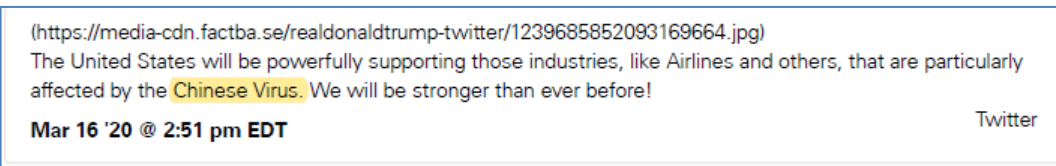
How often do these viruses jump from animals into people and how often do they make people sick? Back in 2018, scientists at the nonprofit EcoHealth Alliance conducted blood-test on about 400 people to look for signs of coronavirus antibodies in their blood. In one area, they found that nearly 3% of people had been infected with an unknown coronavirus in the past few years. "That's pretty high," says Peter Daszak, who helped to lead the study. If you expand those findings to all parts of Southeast Asia where people are exposed to these bats, Daszak estimates that more than a million people are infected with unknown coronaviruses each year. In other words, new coronaviruses are constantly jumping from bats and other animals into people — a process scientists call "spillover." The vast majority of these spillover events do very little, he says. But each one gives the virus the opportunity to adapt and spread more easily from person to person, and find their way to a dense city, such as Wuhan. Both Daszak and Edward Holmes agree: The next coronavirus outbreak could be right around the corner. "I think we need to face reality here," Holmes says. "Coronavirus pandemics are not a once in a hundred year event. "The next one could come at any time. It could come in 50 years or in 10 years. Or it could be next year." ([NPR 03/19/2021](#))

The Timeline Since the COVID-19 Outbreak – Defendant and His Administration

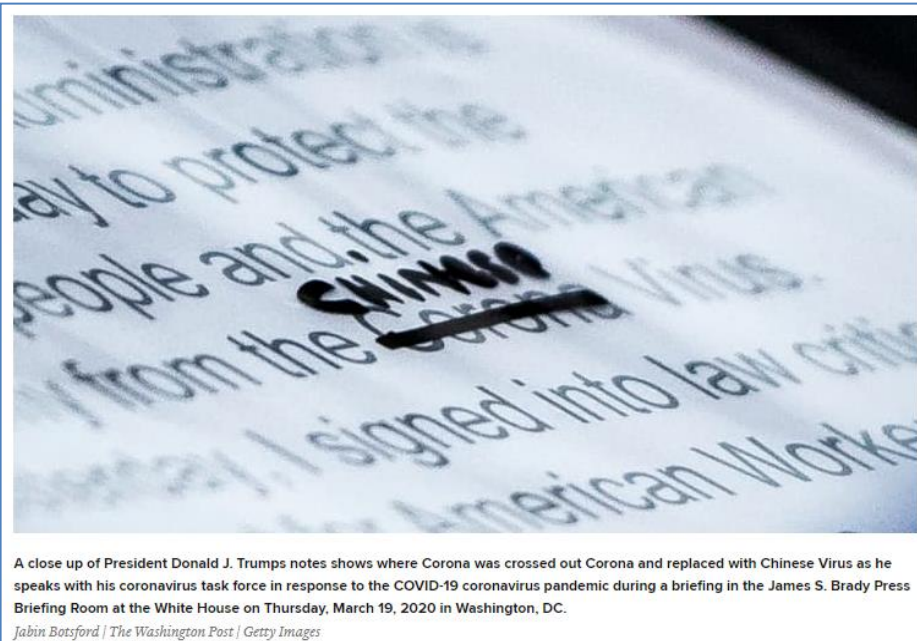
25. On Jan. 29, 2020, Mr. Peter Navarro, Defendant's trade adviser starkly warned Defendant's administration that the coronavirus crisis could cost the United States trillions of dollars and put millions of Americans at risk of illness or death. "The lack of immune protection or an existing cure or vaccine would leave Americans defenseless in the case of a full-blown coronavirus outbreak on U.S. soil," Navarro memo said. "This lack of protection elevates the risk of the coronavirus evolving into a full-blown pandemic, imperiling the lives of millions of Americans." ([NYT 04/06/2020](#))
26. On Feb. 26, 2020, Rep. Judy Chu (D-Calif.) sent a letter to all of her congressional colleagues urging them to stop using terminology that stokes fear and prejudice against Asian Americans. The next day, Feb. 27, 2020 during a hearing on the Department of Health and Human Services budget, Rep. Chu

got Secretary Alex Azar to commit to stop referring to it as the “China coronavirus.” Secretary Azar replied to Rep. Chu, “You’re absolutely right. We must ensure nobody is discriminated against based on ethnicity. Ethnicity is not what causes the novel coronavirus.” Rep. Chu asked, “In fact, will you affirm that racial stereotyping is not an effective way to prevent the spread of COVID-19?” Secretary Azar replied, “That is absolutely correct.” ([C-SPAN 02/27/2020](#))

27. On Mar. 10, 2020, the CDC director Dr. Robert Redfield testified in the House that attaching Chinese to a description of the coronavirus was wrong. ([BusinessInsider 03/11/2020](#))
28. On Mar. 16, 2020, Defendant used the term “Chinese Virus” in a tweet for the pathogen otherwise widely known and called (including by Defendant himself in many earlier tweets) as the coronavirus.



29. On Mar. 18, 2020 at the White House briefing, Defendant was asked by reporters about his persistent use of such term even despite that health officials, of both WHO and his own administration have advised that ethnicity does not cause the virus and there have been reports of increasing incidents of anti-Chinese/Asian Americans. Defendant defended his habit of calling coronavirus the “Chinese virus” by saying “It is not racist at all. No, not at all. ... Because it comes from China, that is why.... I want to be accurate.” ([CNBC 03/18/2020](#))
30. On Mar. 19, 2020 at the White House briefing, Defendant was photographed reading from notes where the word "corona" was replaced with "Chinese". This showed Defendant’s deliberate use of such defamatory and inflammatory terms with racist undertone even though Defendant’s own aides followed the WHO/CDC guidelines advising him not to do so. ([NBC News 03/19/2020](#))



31. On Mar. 23, 2020, Defendant tweeted, “It is very important that we totally protect our Asian American community in the United States, and all around the world. They are amazing people, and the spreading of the Virus.... is NOT their fault in any way, shape, or form. They are working closely with us to get rid of it. WE WILL PREVAIL TOGETHER!” ([NBC News 03/23/2020](#)) However, notably Defendant did not denounce any racial insults and attacks on Asian Americans, and this one tweet stood as isolated message while Defendant used the expression of “Chinese virus” more than 20 times between Mar. 16 and Mar. 30 according to Factbase. ([TheConversation.com 04/21/2020](#)).
32. Since then, Defendant has repeated those defamatory terms many times in tweets, interviews, and campaign rallies. For example, on June 20, 2020 at his re-election campaign rally in Tulsa, Oklahoma, Defendant mockingly said to his supporters, “It has more names than any disease in history. I can name Kung flu. I can name 19 different versions of names.” The crowd cheered on. At the same rally Defendant also used the Spanish word “hombre” when describing a fictional criminal breaking into a young woman’s home while she was alone at night. ([The Guardian 06/20/2020](#))
33. On Jun. 23, 2020 at another campaign rally in the Dream City Church, Defendant once again said, “there has never been anything with so many names, I could give you 19 or 20 names for that, right?”

Wuhan...Wuhan catching on... coronavirus, right? Kung flu... Kung flu... Covid, COVID-19...what is 19, some people cannot explain what the 19...COVID-19...I said that is an odd name...I could give you many many names...” his supporters cheered the whole time. ([Forbes 06/24/2020](#))

34. On Jul. 13, 2020, Defendant said [at the White House](#) “the China plague – you can call it the China virus, you can call it whatever you want to call it. It’s about 20 different names.”
35. On Sep. 17, 2020, Defendant held a campaign rally [in Mosinee, Wisconsin](#), “... you know how many names? We have like 22 different names. I call it the China virus.”
36. After leaving office, Defendant has remained a dominant force and among his supporters. [USAToday 02/21/2021](#) titled one of its pieces “Trump still commands the loyalty of the GOP’s voters”. On Feb. 28, 2021, Defendant gave keynote speech at the annual CPAC held in Orlando. [TheHill 03/01/2021](#) reported a poll that 52% of GOP voters supports Defendant to run in 2024.
37. On Mar. 16, 2021, hours after the mass shooting by a 21-year-old white man in Atlanta, Defendant again used the slander “as I called it China virus covid” during an interview on Fox News ([Newsweek 03/17/2020](#)).
38. On April 8, 2021, the Mar-a-Lago Club hosted a dinner for more than 100 conservative activists, at which Defendant spoke for more than an hour. Next day, the club was booked again for a lunch fundraiser to benefit Sen. Marco Rubio (R-Fla.). Since Jan. 20, at least six Republican candidates have held fundraisers at Defendant’s Florida properties. This weekend, at least six more events will be put on by GOP-allied groups. The events show that Trump has maintained his status as the party’s central figure. Among many GOP leaders came to see Defendant were the House Minority Leader Kevin McCarthy (R-Calif.), Sen. Rick Scott (R-Fla.), and a range of senators and candidates. ([WashingtonPost 04/09/2021](#))

A Partial List of Defendant’s Defamatory Statements

Sources: <https://factba.se/trump/search#chinese%2Bvirus>
<https://factba.se/trump/search#china%2Bvirus>
<https://factba.se/trump/search#kung%2Bflu>

(https://media-cdn.factba.se/realdonaldtrump-twitter/1239685852093169664.jpg)

The United States will be powerfully supporting those industries, like Airlines and others, that are particularly affected by the Chinese Virus. We will be stronger than ever before!

Mar 16 '20 @ 2:51 pm EDT

Twitter

39.

Remarks: Donald Trump Meets With Tourism Executives on the Coronavirus Pandemic - March 17, 2020

"...Well, thank you very much. We have the tourism industry executives, the biggest anywhere in the world. These are the great ones, and they're going to say a couple of little words pretty soon, I think. We'll talk about their company quickly and the number of employees and what's happened since the Chinese virus came

on the App Store (https://itunes.apple.com/us/app/trump-white-house-consolidated-news-release-feed/id1213702329)

View Full Transcript (/transcript/donald-trump-remarks-tourism-executive-briefing-march-17-2020/)

Mar 17 '20

YouTube (https://www.youtube.com/watch?v=DpaccqC-UM8=)

40.

(https://media-cdn.factba.se/realdonaldtrump-twitter/1239889767267008512.jpg)

Cuomo wants "all states to be treated the same." But all states aren't the same. Some are being hit hard by the Chinese Virus, some are being hit practically not at all. New York is a very big "hotspot", West Virginia has, thus far, zero cases. Andrew, keep politics out of it....

Mar 17 '20 @ 4:22 am EDT

Twitter

41.

(https://media-cdn.factba.se/realdonaldtrump-twitter/1240234698053431305.jpg)

I will be having a news conference today to discuss very important news from the FDA concerning the Chinese Virus!

Mar 18 '20 @ 3:12 am EDT

Twitter

42.

(https://media-cdn.factba.se/realdonaldtrump-twitter/1240243188708839424.jpg)

I always treated the Chinese Virus very seriously, and have done a very good job from the beginning, including my very early decision to close the "borders" from China - against the wishes of almost all. Many lives were saved. The Fake News new narrative is disgraceful & false!

Mar 18 '20 @ 3:46 am EDT

Twitter

43.

(https://media-cdn.factba.se/realdonaldtrump-twitter/1240226752447873027.jpg)

For the people that are now out of work because of the important and necessary containment policies, for instance the shutting down of hotels, bars and restaurants, money will soon be coming to you. The onslaught of the Chinese Virus is not your fault! Will be stronger than ever!

Mar 18 '20 @ 2:41 am EDT

Twitter

44.

Press Conference: Donald Trump Joins the Daily Coronavirus Pandemic Briefing - March 18, 2020

"...Thank you very much. I would like to begin by announcing some important developments in our war against the Chinese virus. We'll be invoking the Defense Production Act, just in case we need it. In other words, I think you all know what it is, and it can do a lot of good things if we need it. And we will - we will have it all completed, signing it in just a little while...."

View Full Transcript (/transcript/donald-trump-press-conference-coronavirus-briefing-march-18-2020/)

Mar 18 '20

YouTube (https://www.youtube.com/watch?v=JgDcS-ZBH0k&t=0)

45.

Remarks: Donald Trump Holds a Briefing With Nurses on the Coronavirus Pandemic - March 18, 2020

"...We hope it's going to go quickly. I think we all agree. We're glad to be joined by Vice President Mike Pence, Secretary Alex Azar, Administrator Seema Verma, Dr. Robert Redfield, and Dr. Deborah Birx. Thank you all very much for being here. Thank you very much. We're using the full power of government in response to the Chinese virus...."

[View Full Transcript \(/transcript/donald-trump-remarks-nurses-coronavirus-march-18-2020/\)](/transcript/donald-trump-remarks-nurses-coronavirus-march-18-2020/)

Mar 18 '20

YouTube (<https://www.youtube.com/watch?v=1B5psToNuB8&t=19>)

46.

Press Conference: Donald Trump Joins the Daily Coronavirus Pandemic Briefing - March 19, 2020

"...We probably shouldn't have anybody sitting behind you either. You know, you should probably go back. But I love it. It's so much nicer. But I shouldn't say that because you'll get me now. Thank you all for being here. And we continue our relentless effort to defeat the Chinese virus. Before I begin, I want to start by announcing that today we are bringing home another American citizen...."

[View Full Transcript \(/transcript/donald-trump-press-conference-coronavirus-briefing-march-19-2020/\)](/transcript/donald-trump-press-conference-coronavirus-briefing-march-19-2020/)

Mar 19 '20

YouTube (https://www.youtube.com/watch?v=w_uhrgFSDwg&t=32)

47.

Press Conference: Donald Trump Joins the Daily Coronavirus Pandemic Briefing - March 20, 2020

"...And I think it will. I spoke with – at length with Mitch McConnell. And there's tremendous spirit to get something done, so we'll see what happens. But my conversation was very good with Senator Schumer. I thank you all for joining us, and I'd like to begin by providing an update on what we are doing to minimize the impact of the Chinese virus on our nation's students...."

[View Full Transcript \(/transcript/donald-trump-press-conference-coronavirus-briefing-march-20-2020/\)](/transcript/donald-trump-press-conference-coronavirus-briefing-march-20-2020/)

Mar 20 '20

YouTube (<https://www.youtube.com/watch?v=cWgStdDtXFc&t=25>)

48.

Press Conference: Donald Trump Joins the Daily Coronavirus Pandemic Briefing - March 21, 2020

"...We are working hard. Everybody is working hard. And the people standing alongside of me are working very hard, that I can tell you. We've also reached agreements with Canada and Mexico on new travel rules at our northern and southern borders to halt the entry of the Chinese virus while continuing trade and commerce...."

[View Full Transcript \(/transcript/donald-trump-press-conference-coronavirus-briefing-march-21-2020/\)](/transcript/donald-trump-press-conference-coronavirus-briefing-march-21-2020/)

Mar 21 '20

YouTube (<https://www.youtube.com/watch?v=NG0sTAoLP5k&t=143>)

49.

Press Conference: Donald Trump Joins the Daily Coronavirus Pandemic Briefing - March 22, 2020

"...They're going around the clock. Today, I'm also announcing the launch of a new public-private consortium organized by the White House, the Department of Energy, and IBM to unleash the power of American supercomputing resources to fight the Chinese virus. The following leaders from private industries, academia, and government will be contributing, and they're going to be contributing a lot of different things, but primarily computing resources to help researchers discover new treatments and vaccines...."

[View Full Transcript \(/transcript/donald-trump-press-conference-coronavirus-briefing-march-22-2020/\)](/transcript/donald-trump-press-conference-coronavirus-briefing-march-22-2020/)

Mar 22 '20

YouTube (<https://www.youtube.com/watch?v=W0kZxpbe5D8&t=700>)

50.

Press Conference: Donald Trump Joins the Daily Coronavirus Pandemic Briefing - March 22, 2020

"...And we'll – we'll report further on that one. But it's – that was rough stuff. I want to thank General Milley. I want to thank all of the people that were involved and the people that went in to get her. I want to thank you very much. As we continue to marshal every resource at America's disposal in the fight against the Chinese virus, we're profoundly grateful to our nation's state and local leaders, doctors, nurses, law enforcement, and first responders who are waging this battle on the ground...."

[View Full Transcript \(/transcript/donald-trump-press-conference-coronavirus-briefing-march-22-2020/\)](/transcript/donald-trump-press-conference-coronavirus-briefing-march-22-2020/)

Mar 22 '20

YouTube (<https://www.youtube.com/watch?v=W0kZxpbe5D8&t=68>)

51.

(<https://media-cdn.factba.se/realdonaldtrump-twitter/1241897485779468288.jpg>)

My friend (always there when I've needed him!), Senator @RandPaul, was just tested "positive" from the Chinese Virus. That is not good! He is strong and will get better. Just spoke to him and he was in good spirits.

Mar 22 '20 @ 5:20 pm EDT

Twitter

52.

Press Conference: Donald Trump Joins the Daily Coronavirus Pandemic Briefing - March 26, 2020

"...I think it was time though, because, you know, I talk about the Chinese virus and – and I mean it. That's where it came from. You know, if you look at Ebola, if you look at all – Lyme. Right? Lyme, Connecticut. You look at all these different, horrible diseases, they seem to come with a name with the location...."

[View Full Transcript \(/transcript/donald-trump-press-conference-coronavirus-briefing-march-26-2020/\)](#)

Mar 26 '20

YouTube (<https://www.youtube.com/watch?v=ZJmInt-QZgY&t=1936>)

53.

Interview: Sean Hannity Interviews Donald Trump Live Via Telephone - March 26, 2020

"...We have the greatest people at this kind of thing in the world. And with China, they said that some of our soldiers caused the problems. We're saying what soldiers? What are you talking about? It wasn't by him, I don't believe. But nevertheless, it got out there and I started calling it the Chinese virus...."

[View Full Transcript \(/transcript/donald-trump-interview-hannity-fox-news-march-26-2020/\)](#)

Mar 26 '20

YouTube (<https://www.youtube.com/watch?v=NbnEx5j1Y9w&t=2129>)

54.

Interview: Donald Trump Calls In to Fox and Friends for an Interview - March 30, 2020

"...They do it and we do it and we call them different things. And you know, I make statements that are very strong against China, including the Chinese virus, which has been going on for a long time. I mean, I wouldn't say they were thrilled with that statement. Where they said our soldiers did it, they said our soldiers did it. I said, you mean the Chinese virus?..."

[View Full Transcript \(/transcript/donald-trump-interview-fox-and-friends-march-30-2020/\)](#)

Mar 30 '20

YouTube (<https://www.youtube.com/watch?v=iEhLe5G4RU&t=1285>)

55.

(<https://media-cdn.factba.se/realdonaldtrump-twitter/1248591409743003650.jpg>)

RT @SenTomCotton: @Max_Fisher claims—without evidence—that I believe the China virus was "produced by a Chinese weapons lab." He should ha...

Apr 10 '20 @ 4:39 am EDT

Twitter

56.

Interview: Scott Thuman of Sinclair Broadcast Group Interviews Donald Trump - June 17, 2020

"...Well, I think what happened and you see it better than maybe anybody, frankly, is that we were doing phenomenally well, the economy was great, jobs were great, best unemployment rates we've ever had for African American, for Hispanic, for Asian, for women, for everybody, and it was great. And then, we got hit with the Chinese virus and it was a whole different thing...."

[View Full Transcript \(/transcript/donald-trump-interview-sinclair-media-group-scott-thuman-june-17-2020/\)](#)

Jun 17 '20

YouTube (<https://www.youtube.com/watch?v=7isQmmovZYI&t=23>)

57.

Speech: Donald Trump Holds a Political Rally in Tulsa, Oklahoma - June 20, 2020

"...It hasn't happened to me yet. You know, when that happens, there's nothing you can do to make up for it. You might as well just walk off the stage because the speech is a disaster. True. Right? Right? But we just turned the United States into the dominant energy superpower of the world, of the world. And because of the Chinese virus, what happened about three months ago, it looked like we were in big trouble and we were – and I got it back together...."

[View Full Transcript \(/transcript/donald-trump-speech-kag-rally-tulsa-oklahoma-june-20-2020/\)](#)

Jun 20 '20

YouTube (<https://www.youtube.com/watch?v=mdudxAZhJKM&t=512>)

58.

Speech: Donald Trump Holds a Political Rally in Tulsa, Oklahoma - June 20, 2020

"...I can name **kung flu**. I can name 19 different versions of names. Many call it a virus, which it is. Many call it a flu, what difference? I think, we have 19 or 20 versions of the name but they say to me, where do you get the energy? I say, I don't have a choice, I don't have a choice. You know, it was interesting...."

[View Full Transcript \(/transcript/donald-trump-speech-kag-rally-tulsa-oklahoma-june-20-2020/\)](#)

Jun 20 '20

YouTube (<https://www.youtube.com/watch?v=mdudxAZhJKM&t=1309>)

59.

Interview: David Brody of CBN News Interviews Donald Trump at The White House - June 22, 2020

"...So, uh, and you look at the Supreme court they're pro-life. So we'll see what happens. We will, uh, I think we're gonna win. I think we're gonna win maybe big because we've done a job like nobody else. You know, we were sailing and then we got hit with the, uh, **Chinese virus**, but we were sailing. We were so far up and we were doing very well...."

[View Full Transcript \(/transcript/donald-trump-interview-david-brody-cbn-news-june-22-2020/\)](#)

Jun 22 '20

YouTube (<https://www.youtube.com/watch?v=SNFFHLnxArU&t=89>)

60.

Speech: Donald Trump Delivers an Address at the Dream City Church in Phoenix - June 23, 2020

"...**Kung flu**, yeah. [Applause] **Kung flu**. "COVID." "COVID-19." "COVID." I said, "What's the '19'?" "COVID-19." Some people can't explain what the 19 -- give me the -- "COVID-19." I said, "That's an odd name." I could give you many, many names...."

[View Full Transcript \(/transcript/donald-trump-speech-american-youth-phoenix-arizona-june-23-2020/\)](#)

Jun 23 '20

YouTube (<https://www.youtube.com/watch?v=zPtd6IN5UmM&t=2085>)

61.

Speech: Donald Trump Delivers an Address at the Dream City Church in Phoenix - June 23, 2020

"...Do you ever notice? I said, the other night -- did anybody see my speech the other night, on Saturday night? [Applause] But I said the other night, "There's never been anything where they have so many names." I could give you 19 or 20 names for that, right? It's got all different names. "Wuhan." "Wuhan" was catching on. "Coronavirus," right? [Audience member shouts "**Kung Flu**"]...."

[View Full Transcript \(/transcript/donald-trump-speech-american-youth-phoenix-arizona-june-23-2020/\)](#)

Jun 23 '20

YouTube (<https://www.youtube.com/watch?v=zPtd6IN5UmM&t=2053>)

62.

Press Conference: Donald Trump Announces Executive Order on Hong Kong and China - July 14, 2020

"...As Vice President, Biden opposed tariffs, and he was standing up for China. He didn't want to do anything to disrupt the relationship with China, even though China was taking us to the cleaners. He opposed my very strict travel ban on Chinese nationals to stop the spread of the **China virus**. He was totally against it. "Xenophobic," he called me. "Xenophobic." A month later, he admitted I was right...."

[View Full Transcript \(/transcript/donald-trump-press-conference-china-hong-kong-july-14-2020/\)](#)

Jul 14 '20

YouTube (<https://www.youtube.com/watch?v=8MiIRELznIE&t=805>)

63.

Remarks: Donald Trump Holds a Virtual Michigan Tele-Rally - July 18, 2020

"...China had the worst year they've had in 67 years prior to the **Chinese virus** coming in, prior to the pandemic, prior to whatever you want -- you have many names you can call it. You can call it lots of different names but it's all the same thing. They should have stopped it. They should have stopped it at their borders and they didn't. They chose not to I guess because they largely stopped it going into China, but not going to Europe, the U.S., and the rest of the world...."

[View Full Transcript \(/transcript/donald-trump-remarks-tele-rally-michigan-july-18-2020/\)](#)

Jul 18 '20

YouTube (<https://www.youtube.com/watch?v=AticlyfJaXA&t=522>)

64.

(https://media-cdn.factba.se/realdonaldtrump-twitter/1313266827653414913.jpg)

....invincible hero, who not only survived every dirty trick the Democrats threw at him, but the Chinese virus as well. He will show America we no longer have to be afraid." @MirandaDevine @NYPost Thank you Miranda. Was over until the Plague came in from China. Will win anyway!

Oct 5 '20 @ 3:56 pm EDT

Twitter

65.

Speech: Donald Trump Holds a Campaign Rally in Green Bay, Wisconsin - October 30, 2020

"...Shawn, he's great. He's fanta – White House physician. And he said, "Barron tested positive." I said, "For what?" He said, "For COVID." You know, there's, like, 30 different names. I happen to call it the China plague or the China virus, 'cause it's more, it's – it's more accurate, right? And, like, you know, about 14 minutes later, I said, "How's Barron doing?" Well, he's recovered fully...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-green-bay-wisconsin-october-30-2020/\)](#)

Oct 30 '20

YouTube (<https://www.youtube.com/watch?v=WTv-CHZ9xNk&t=2076>)

66.

Speech: Donald Trump Holds a Campaign Rally in Montoursville, Pennsylvania - October 31, 2020

"...That's another. I mean, think of it. That's never been done before. And while foreign nations are in a free fall, and you see that. And we don't want that, but you see what's going on is COVID or the China virus or the China plague, there's about 21 different names. We're creating the world's greatest economic powerhouse, and next year will be one of the greatest years, maybe the best year that we've ever had, based on what's happening...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-montoursville-pennsylvania-october-31-2020/\)](#)

Oct 31 '20

YouTube (<https://www.youtube.com/watch?v=1QjF5NWM3PU&t=412>)

67.

Speech: Donald Trump Holds a Campaign Rally in Dubuque, Iowa - November 1, 2020

"...And I think after the poll I saw from the very nice newspaper that usually doesn't treat me so well, but they treated me very well. I think maybe they're gonna give up on place called Iowa pretty soon, too. I think they'll give up on Iowa pretty soon. We will mass-distribute the vaccine in just a few short weeks and we will quickly eradicate the virus, wipe out the China plague...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-dubuque-iowa-november-1-2020/\)](#)

Nov 1 '20

YouTube (https://www.youtube.com/watch?v=rLoMKA4Q_c8&t=2119)

68.

Speech: Donald Trump Holds a Campaign Rally in Hickory, North Carolina - November 1, 2020

"...The doctor came up to us and said, "I'm sorry but Barron has tested positive," and I said, "For what?" Tested positive for what? And, you know, it's got about 30 different names, but he said COVID. We could call it the China plague, the China virus, but he didn't say, he said COVID. I said, "Gee, that's too bad." He said, "Oh, he'll be fine." About 14 minutes later he came back. I said, "How's Barron doing?" "Oh, he shook it off...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-hickory-north-carolina-november-1-2020/\)](#)

Nov 1 '20

YouTube (<https://www.youtube.com/watch?v=Ltn62QiuYPI&t=868>)

69.

Speech: Donald Trump Holds a Campaign Rally in Grand Rapids, Michigan - November 2, 2020

"...It will quickly eradicate the virus and wipe out the China plague once and for all. And, with or without the vaccine, great companies, Johnson and Johnson, Moderna, Pfizer, but, with or without it, we are rounding the turn. Just remember that. You know, they don't like it. They hate it when I say that. We're rounding the turn...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-grand-rapids-mi-november-2-2020/\)](#)

Nov 2 '20

YouTube (https://www.youtube.com/watch?v=LvidPu_MZzM&t=3053)

70.

Speech: Donald Trump Holds a Campaign Rally in Kenosha, Wisconsin - November 2, 2020

"...And I said, well, I hope like 12 minutes later I say, husband doing doctor, sir, he's 100 percent now. He's. Get your kids back to school. OK. Right, get them back to school. All right, so we're going to mass distribute the vaccine in just a few short weeks. It's going to be coming out very soon. And we will quickly eradicate the virus, wipe out the China plague once and for all...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-kenosha-wisconsin-november-2-2020/\)](/transcript/donald-trump-speech-campaign-rally-kenosha-wisconsin-november-2-2020/)

Nov 2 '20

YouTube (<https://www.youtube.com/watch?v=KhS9oItyKTw&t=2796>)

71.

Remarks: Donald Trump Provides an Update on the Coronavirus Pandemic - November 13, 2020

"...And I'd like to congratulate everyone involved in this effort. It's been an incredible effort. As a result of Operation Warp Speed, Pfizer announced on Monday that its China virus vaccine is more than 90 percent effective. This far exceeds any and all expectations. Nobody thought they'd get to that level. And we have others coming which we think will be at equal level – maybe more, if that's possible...."

[View Full Transcript \(/transcript/donald-trump-remarks-pandemic-november-13-2020/\)](/transcript/donald-trump-remarks-pandemic-november-13-2020/)

Nov 13 '20

YouTube (<https://www.youtube.com/watch?v=2NB-L5kZ-Pg&t=61>)

72.

Remarks: Donald Trump Presents the National Thanksgiving Turkey - November 24, 2020

"...During this Thanksgiving, we extend our eternal gratitude to the doctors, nurses, healthcare workers, and scientists who have waged the battle against the China virus, and we give thanks for the vaccines and therapies that will soon end the pandemic. It's just – just such a tremendous feeling to know that they're coming, and they'll be coming probably starting next week, or shortly thereafter...."

[View Full Transcript \(/transcript/donald-trump-remarks-national-thanksgiving-turkey-pardon-november-24-2020/\)](/transcript/donald-trump-remarks-national-thanksgiving-turkey-pardon-november-24-2020/)

Nov 24 '20

YouTube (<https://www.youtube.com/watch?v=yTAIqeB8SSo&t=296>)

73.

Speech: Donald Trump Addresses Troops Worldwide on Thanksgiving - November 26, 2020

"...We've done a job. Welcome as well to everyone at Ali Al Salaam Airbase in Kuwait, including major Tommy Rutherford and the 386 expeditionary logistics readiness squadron. Thank you very much, Tommy. Your mission to support our soldiers on the ground and deliver precious cargo where it needs to go, including transporting 18 tons of medical equipment during the China virus pandemic...."

[View Full Transcript \(/transcript/donald-trump-remarks-thanksgiving-troops-videoconference-november-26-2020/\)](/transcript/donald-trump-remarks-thanksgiving-troops-videoconference-november-26-2020/)

Nov 26 '20

YouTube (<https://www.youtube.com/watch?v=NMQ8jGBkSg4&t=208>)

74.

Speech: Donald Trump Makes an Unscheduled Pre-Recorded Speech on the Election - December 2, 2020

"...We will compare the signature on the envelope to the signatures from past elections. And we will find that many thousands of people signed these ballots illegally. The Democrats had this election rigged from the beginning. They used the pandemic, sometimes referred to as the China virus; where it originated; as an excuse to mail out tens of millions of ballots, which ultimately led to a big part of the fraud...."

[View Full Transcript \(/transcript/donald-trump-speech-elections-unannounced-december-2-2020/\)](/transcript/donald-trump-speech-elections-unannounced-december-2-2020/)

Dec 2 '20

YouTube (<https://www.youtube.com/watch?v=RFzTuaVS8Kk&t=1047>)

75.

Speech: Donald Trump Holds a Political Rally in Valdosta, Georgia - December 5, 2020

"...They fight – I could tell you about David, I could tell you about Kelly. She fights for you every single day, loves your state. When our nation was hit with the China virus, Senator Loeffler helped rescue the US economy by voting to pass a historic \$3 trillion bill, relief for American workers and families...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-valdosta-georgia-december-5-2020/\)](/transcript/donald-trump-speech-campaign-rally-valdosta-georgia-december-5-2020/)

Dec 5 '20

YouTube (<https://www.youtube.com/watch?v=hKBZemnS1j4&t=3425>)

76.

Remarks: Donald Trump Addresses the Operation Warp Speed Vaccine Summit - December 8, 2020

"...But this will vanquish the – the problem, this horrible scourge – as I call it, the "China virus," because that's where it came from...."

[View Full Transcript \(/transcript/donald-trump-remarks-coronavirus-vaccine-summit-december-8-2020/\)](#)

Dec 8 '20

YouTube (<https://www.youtube.com/watch?v=h1GXramUHbE&t=710>)

77.

Donald Trump Vlog: Contesting Election Results - December 22, 2020

"...This is not the first and only time that the media and the Biden campaign flagrantly lied to the American people. They repeatedly insisted that we would not produce a vaccine for the China virus before the middle of next year. And yet, before the end of this year, we have already authorized two vaccines with tens of millions of doses of distribution and hundreds of millions more on their way...."

[View Full Transcript \(/transcript/donald-trump-vlog-contesting-election-results-december-22-2020/\)](#)

Dec 22 '20

YouTube (<https://www.youtube.com/watch?v=YJ8LFWC1Wks&t=715>)

78.

Donald Trump Vlog: 2020 Year in Review - December 31, 2020

"...In the face of great challenges this year, American showed incredible grit, strength, tenacity and resolve. And together, we achieved truly historic victories like nobody ever thought possible. To defeat the China virus, we launched the largest mobilization since World War Two. We transformed our factories to build tens of thousands of ventilators, and millions, and millions of masks virtually overnight...."

[View Full Transcript \(/transcript/donald-trump-vlog-2020-year-review-december-31-2020/\)](#)

Dec 31 '20

YouTube (<https://www.youtube.com/watch?v=7J5rA1eRBB0&t=0>)

79.

Speech: Donald Trump Holds a Political Rally in Dalton, Georgia - January 4, 2021

"...Working with David, Kelly helped rescue the US economy from the China virus, passing nearly four trillion dollars in economic relief, saving over 1.5 million Georgia jobs, and rescuing countless small businesses all across your state, businesses that now are doing really well. And, you know, we also came up with the vaccine...."

[View Full Transcript \(/transcript/donald-trump-speech-campaign-rally-dalton-georgia-january-4-2021/\)](#)

Jan 4 '21

YouTube (https://www.youtube.com/watch?v=kL_jpqrR8RM&t=1904)

80.

Remarks: Donald Trump Discusses the Border Wall in Alamo, Texas - January 12, 2021

"...As you probably know, in Tijuana, various parts of Mexico, the COVID – it's got about 24 names I can call it, from "COVID" to "China virus." I can call it the "plague." I call it the "China plague." A lot of different names. But we always call it the "invisible enemy." But the invisible enemy has been very tough on Mexico, and we have areas along the border where we're in great shape because right there, because of that, that we're in great shape. But on the other side, in Mexico, they're suffering greatly with the virus. It's been incredible what we've achieved. And we didn't do the wall because of COVID; we did the wall because of security and drugs and other things. But it turned out that, in the middle of it all, along came this horrible plague...."

[View Full Transcript \(/transcript/donald-trump-remarks-border-wall-alamo-texas-january-12-2021/\)](#)

Jan 12 '21

YouTube (<https://www.youtube.com/watch?v=NLtrFIIfISM&t=927>)

81.

Remarks: Donald Trump Discusses the Border Wall in Alamo, Texas - January 12, 2021

"...My administration also instituted vital public health measures on the border. In response to the China virus, under Title 42 of the U.S. Code, illegal immigrants are being promptly removed to protect the health of border agents, other migrants, and local communities, and the public at large. Removing these protections would invite a public health catastrophe of epic proportions...."

[View Full Transcript \(/transcript/donald-trump-remarks-border-wall-alamo-texas-january-12-2021/\)](#)

Jan 12 '21

YouTube (<https://www.youtube.com/watch?v=NLtrFIIfISM&t=901>)

82.

Speech: Donald Trump Delivers His Farewell Address to the Nation - January 19, 2021

"...Also, and very importantly, we imposed historic and monumental tariffs on China; made a great new deal with China. But before the ink was even dry, we and the whole world got hit with the China virus. Our trade relationship was rapidly changing, billions and billions of dollars were pouring into the U.S., but the virus forced us to go in a different direction...."

[View Full Transcript \(/transcript/donald-trump-speech-farewell-address-january-19-2021/\)](/transcript/donald-trump-speech-farewell-address-january-19-2021/)

Jan 19 '21

YouTube (<https://www.youtube.com/watch?v=kaXFauQIR5A&t=312>)

83.

Remarks: Donald Trump at Joint Base Andrews Before Leaving Washington - January 20, 2021

"...That's a very big number. That's a record-setting number. And so we've done a lot, and there's still things to do. The first thing we have to do is pay our respects and our love to the incredible people and families who suffered so gravely from the China virus. It's a horrible thing that was put onto the world...."

[View Full Transcript \(/transcript/donald-trump-remarks-final-joint-base-andrews-departure-january-20-2021/\)](/transcript/donald-trump-remarks-final-joint-base-andrews-departure-january-20-2021/)

Jan 20 '21

YouTube (<https://www.youtube.com/watch?v=mBe6ncN-YHc&t=381>)

84.



Donald J. Trump ✓

@realDonaldTrump



European Countries are sadly getting clobbered by the China Virus. The Fake News does not like reporting this!

4:11 PM · Nov 16, 2020



85.



Donald J. Trump ✓

@realDonaldTrump



.@RudyGiuliani, by far the greatest mayor in the history of NYC, and who has been working tirelessly exposing the most corrupt election (by far!) in the history of the USA, has tested positive for the China Virus. Get better soon Rudy, we will carry on!!!

8:16 PM · Dec 6, 2020



86.



Donald J. Trump ✓

@realDonaldTrump



Europe and other parts of the World being hit hard by the China Virus - Germany, France, Spain and Italy, in particular. The vaccines are on their way!!!

12:43 PM · Dec 18, 2020



4



See the latest COVID-19 information on Twitter

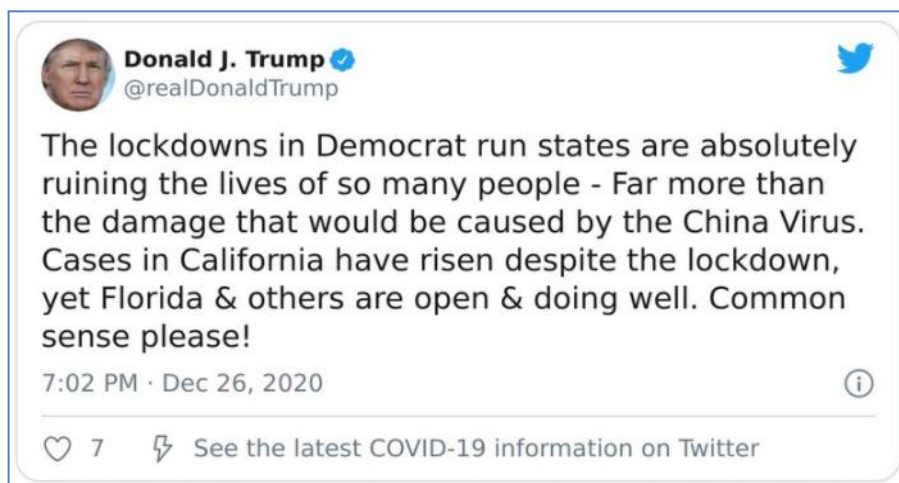
87.



88.



89.

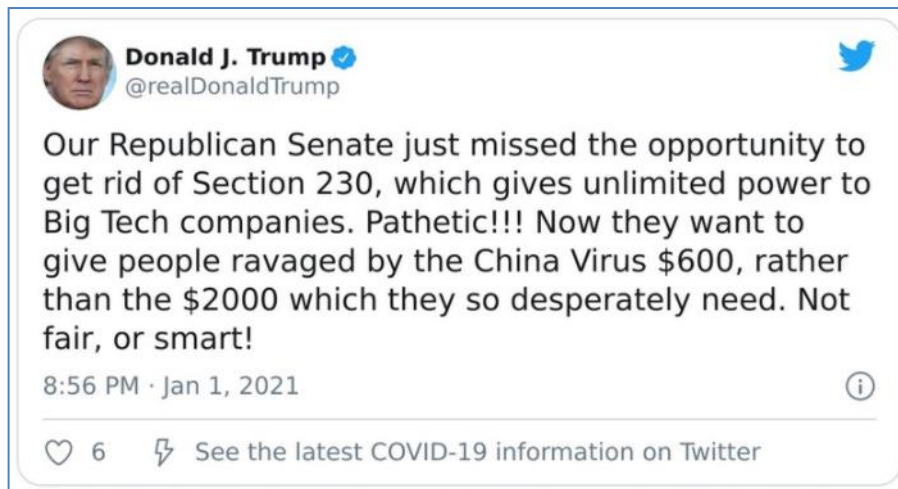


90.

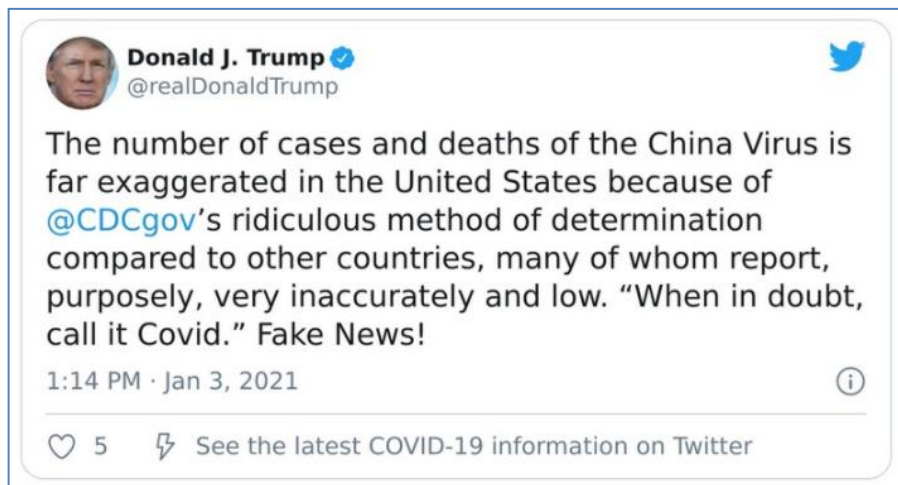
91.



92.



93.





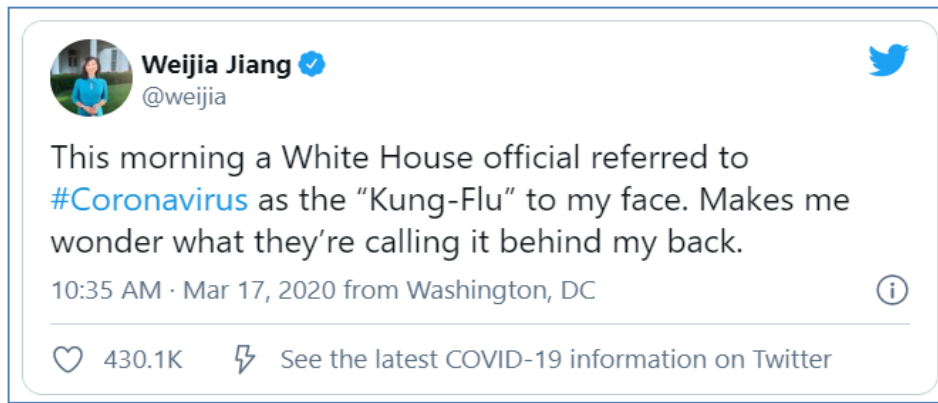
94.

The Significant Increase in Anti-Asian Americans Incidents

95. Since late February 2020 many news outlets had already reported increase in anti-Asian incidents.

For example, [NPR reported on Mar. 4, 2020](#) with the headline “When Xenophobia Spreads Like A Virus”. The report described many specific instances of harassment and hostility against Asian Americans across the country — regardless of ethnicity, location or age.

96. On Mar. 17, 2020, CBS News reporter Weijia Jiang tweeted a White House official referred to coronavirus as the “Kung-Flu” to her face.



97. On Mar. 19, 2020 John C. Yang, president and executive director of Asian Americans Advancing Justice commented that Defendant's use of the term could have a dangerous impact, "I absolutely think that words used by him matter. Certainly, use of this term by him and others even in the last couple of weeks have led to a noticeable incline in hate incidents that we are seeing. I do think that there is a correlation." ([NBC News 03/19/2020](#))
98. On Mar. 24, 2020, the Department of Homeland Security (DHS) sent a memo to law enforcement officials around the country warning that violent extremists could seek to take advantage of the COVID-19 pandemic by carrying out attacks against the U.S. One portion of the bulletin singles out activity by white supremacists online who the DHS says have "advocated for violence against a range of targets, including critical infrastructure and faith-based and minority communities -- including Asian Americans in response to the COVID outbreak." ([ABC News 03/24/2020](#))
99. On Mar. 26, 2020, the online reporting forum Stop AAPI Hate reported that since its inception Mar. 18, it has received more than 650 direct reports of discrimination against primarily Asian Americans. People have reported being coughed at or spit on and being told to leave stores, Uber and Lyft drivers refusing to pick them up, verbal and online harassment and physical assault, according to the site, which was launched by the Asian Pacific Policy and Planning Council and Chinese for Affirmative Action. "It shows how pervasive and widespread these anti-Asian cases are occurring," said Russell Jeung, professor of Asian American Studies at San Francisco State University who compiled the data. Jeung's earlier research, which was based on media reports of racism and xenophobia against Asian

Americans, revealed more than 1,000 cases between Jan. 28 and Feb. 24, a period during which coronavirus cases were first reported in the United States. ([NBC News 03/26/2020](#))

100. On Mar. 27, 2020, Federal law enforcement warned an increase in hate crimes against Asian Americans as the coronavirus crisis continues to grow, "The FBI assesses hate crime incidents against Asian Americans likely will surge across the United States, due to the spread of coronavirus disease ... endangering Asian American communities," according to the intelligence report compiled by the FBI's Houston office. ([ABC News 03/27/2020](#))

101. On Jul. 30, 2020, Jasmine Yuan, a 39-year-old resident in Austin described that a stranger in a car yelled "corona!" at her while driving by a grocery store parking lot in North Austin, and how she has felt hurt, angry, unsafe, scared, and intimidated. ([Austin American Stateman 07/30/2020](#))

102. On Oct. 30, 2020, CNN reporter Amara Walker described three back-to-back racist encounters she experienced at New Orleans International Airport. ([CNN 11/02/2020](#))

103. On Feb. 27, 2021, the N.B.A. said it was investigating a report by Jeremy Lin, one of the best-known Asian-American players in basketball, that he had been called "coronavirus" on the court. It was another prominent example of the rising tide of bigotry that many Asian-Americans say they have endured since last year, when former President Donald J. Trump began describing the coronavirus as the "China virus." ([NYT 02/27/2021](#))

104. On Mar. 16, 2021 around 5 p.m. EDT, a 21-year-old white man shot and killed eight people – six of whom were Asian women – at three Atlanta-area spas. ([NYT 03/17/2021](#))

105. Also on Mar. 16, 2021, [StopAAPIHate.org](#) reported 3,795 incidents of verbal and physical attacks from Mar. 19, 2020 to February 28, 2021, representing almost 50% increase over the previous year; and Chinese Americans accounted for the highest 42.2% of incidents. In particular, Asian women were targeted in 68% of the cases. ([NBC News 03/16/2021](#))

106. On Mar. 18, 2021, prominent Asian American lawmakers, scholars and advocates, including actor and producer Daniel Dae Kim, testified on the rise in hate crimes and discrimination against

Asian Americans before the House Judiciary Subcommittee on the Constitution, Civil Rights and Civil Liberties. Experts testified that such language had contributed to an atmosphere of increased animus against Asian-Americans. Attacks targeting Asian-Americans - many of them women or older people - have increased nearly 150% in the past year, the experts said. ([ABC News 03/18/2021](#))

107. In addition, the analysis released by the Center for the Study of Hate and Extremism at California State University, San Bernardino, this month examined hate crimes in 16 of America's largest cities. It revealed that while such crimes in 2020 decreased overall by 7 percent, those targeting Asian people rose by nearly 150 percent. For example, anti-Asian hate crimes rose from three in 2019 to 28 in 2020, a 833 percent increase. Los Angeles and Boston also experienced notable rises, from seven to 15 and six to 14, respectively. ([NBC News 03/09/2021](#))

108. On Mar. 25, 2021, the NYPD announced it would deploy undercover officers as decoys to combat a rise in hate crimes targeting Asian-Americans in New York City. ([WSJ 03/25/2021](#))

109. On Mar. 27, 2021, a man has been charged with hate crimes after allegedly harassing a 65-year-old Asian woman with racial slurs in Midtown. Bobby Eli, 48, allegedly approached the victim on West 40th Street near Port Authority on Friday afternoon, and started mocking the woman, "You stupid Chinese blue hair. You stupid Chinese b—h." ([NYPost 03/27/2020](#))

110. On Mar. 28, 2021, an Asian woman was struck in the face by a bigoted goon spewing ethnic slurs at her in a Manhattan subway station over the weekend. "Fuck you, C—k," the attacker yelled at the 37-year-old inside the East 51st Street and Lexington Avenue subway station on Saturday night. "You should go back to your country. This is all because of you." ([NYPost 03/28/2020](#))

111. On Mar. 30, 2021, a 65-year-old Filipino immigrant was walking down a street near Times Square, a man, in broad daylight, suddenly and brutally kicked her again and again in her stomach and head while yelling obscenity and "You don't belong here." Meanwhile three men watched from the lobby of a nearby luxury apartment building. When the woman struggled to stand up, one of the men, a security guard, closed the front door to the building. ([NYT 03/30/2021](#))

112. On Apr. 3, 2021, three Asian-American high school students spoke out about their experience of discrimination and harassment, their feelings of heartbroken, threatened, fear, etc. ([NPR 04/03/2021](#))
113. A U.S. Department of Education survey (<https://ies.ed.gov/schoolsurvey/>) published in late March revealed that 15% of Asian American students were attending school in person full-time in January. That is compared with 49% of white students, 33% of Latino students and 28% of Black students. Across the nation, about 43% were still in full-time remote learning in January. Among Asian American students, that share was nearly 70%. Harassment was one of the factors. Many parents still fear their children will face racist harassment on campus or on their routes to school, said Vanessa Leung, co-executive director of the Coalition of Asian American Children and Families, a New York City-based organization that advocates for improved policies, funding and services for Asian Pacific Americans. ([The Center for Public Integrity 04/02/2021](#))
114. [BBC News reported on April 2, 2021](#), Covid 'hate crimes' against Asian Americans on rise with a list of recently reported attacks:
- 1) An 84-year-old Thai immigrant in San Francisco, California, died last month after being violently shoved to the ground during his morning walk.
 - 2) In Oakland, California, a 91-year-old senior was shoved to the pavement from behind.
 - 3) An 89-year-old Chinese woman was slapped and set on fire by two people in Brooklyn, NY.
 - 4) A stranger on the New York subway slashed a 61-year-old Filipino American passenger's face with a box cutter.
 - 5) Asian American restaurant employees in New York City told the New York Times they now always go home early for fear of violence and harassment.
 - 6) An Asian American butcher shop owner in Sacramento, California found a dead cat - likely intended for her in the store's parking lot; police are investigating it as a hate crime.
 - 7) An Asian American family celebrating a birthday at a restaurant in Carmel, California, was berated with racist slurs by a Trump-supporting tech executive.

- 8) Several Asian Americans home owners say they've been abused with racial slurs and had rocks thrown at their houses.
 - 9) The only Asian American lawmaker in the Kansas legislature says he was physically threatened in a bar by a patron who accused him of carrying the coronavirus
 - 10) NYPD arrested a man who assaulted a woman during a protest against anti-Asian racism.
 - 11) A grieving family received a hateful letter on the day of their father's funeral, telling them to "pack your bags and go back to your country where you belong"
 - 12) A school board candidate of Vietnamese descent in Portland, Oregon found a derogatory note with the words "Kung Flu" on her doorstep
 - 13) A medical worker of Filipino descent in Los Gatos, California was shoved to the ground from behind by an assailant who told her to "go back to[expletive] China."
 - 14) From March to May 2020 alone, over 800 Covid-related hate incidents were reported from 34 counties in the state, according to a report released by the Asian Pacific Policy Planning Council.
 - 15) Those numbers have since intensified in Orange County, where anti-Asian hate incidents are up by an estimated 1200%, according to the Center for the Study of Hate and Extremism.
 - 16) In neighboring Los Angeles County, hate crimes against Asian Americans are up 115%.
115. On Apr. 14, 2021, Director of National Intelligence Avril Haines told lawmakers during a Senate Intelligence Committee hearing, "It is absolutely accurate that the intelligence community does not know exactly where, when or how the COVID-19 virus was transmitted initially." She replied to Senator Marco Rubio (R-FL) "Basically, components have coalesced around two alternative theories. These scenarios are, it emerged naturally from human contact with infected animals or it was a laboratory accident." ([Yahoo!News 04/14/2021](#))
116. On May 16, 2021, Ali Velshi, anchor of MSNBC interviewed a group of Asian Americans and Pacific Islanders (AAPI) in San Francisco, California who discussed openly and emotionally about the increase in verbal and physical attacks against their community, and how difficult the last year it

has been for themselves, their families and their business. A small business owner described her feeling of powerless, fearful, heartbroken, anxiety, etc. A young artist described his relatives were even afraid of going out for groceries. Christina Shea, Deputy Chief & Director of Clinical Services at RAMS, attributed Defendant's defamatory rhetoric to the heightened fear and increased incidents. Pastor Joey Chen of Sunset Church in San Francisco described a small business owner had to closed his business out of fear. Ms. Debra Wong Yang, a businesswoman described what was most disturbing to her was many bystanders did nothing to stop attack on AAPIs, and she does not believe this is not what America stands for. A sheriff of San Francisco shared his feeling of anger and frustration how AAPI people have been victimized due to prejudice. ([MSNBC 05/16/2021](#))

117. On Apr. 22, 2021, the Senate passed (94-1) the Covid-19 Hate Crime Act (S.937) to address the significant increase in anti-Asian Americans crimes. "Crimes motivated by bias against race, national origin, or other characteristics simply cannot be tolerated. Our amendment both denounces these acts and marshals additional resources toward addressing and stopping these despicable crimes," Senator Collins said in her floor speech. ([NYT 04/22/2021](#))

118. On May 18, 2021, the House passed the Senate bill with 364-62 vote. Congresswoman Grace Meng of Queens, NY, said her community has faced "despicable and sickening acts of hate and violence" over the last year and a half. "Those of Asian descent have been blamed and scapegoated for the outbreak of Covid-19, and as a result, Asian Americans have been beaten, slashed, spat on, and even set on fire and killed. The Asian American community is exhausted from being forced to endure this rise in bigotry and racist attacks." ([NBC News 05/18/2021](#))

119. On May 20, 2021, following overwhelming support from both chambers of Congress, President Biden signed the COVID-19 Hate Crimes Act that addresses hate crimes throughout the COVID-19 pandemic, with particular emphasis on the increase in violence against Asian Americans. ([NPR 05/20/2021](#))

THE LEGAL DEFINITION OF DEFAMATION

120. Defamation is a statement that injures a third party's reputation. The tort of defamation includes both libel (written statements) and slander (spoken statements). To prove prima facie defamation, a plaintiff must show four elements: 1) a false statement purporting to be fact; 2) publication or communication of that statement to a third person; 3) fault amounting to at least negligence; and 4) damages, or some harm caused to the person or entity who is the subject of the statement.
121. Labeling a statement an opinion does not automatically make it an opinion or make it safe from the possibility of it being defamatory. If a reader or listener could reasonably understand that the communication as stating a fact that could be verified, the communication will not be considered an opinion, especially if it is sufficiently derogatory to hurt the subject's reputation. Also, a communication that is presented in the form of an opinion may be considered defamatory if it implies that the opinion is based on defamatory facts that have not been disclosed.

THE SUPREME COURT PRECEDENTS

122. [*New York Times Co. v. Sullivan*](#), 376 U.S. 254 (1964)'s primary holding: To sustain a claim of defamation or libel, the First Amendment requires that the plaintiff show that the defendant knew that a statement was false or was reckless in deciding to publish the information without investigating whether it was accurate.
123. [*Gertz v. Robert Welch, Inc.*](#), 418 U.S. 323 (1974)'s primary holding: Liability in defamation cases against individuals cannot be imposed without fault, but states otherwise can craft their own defamation laws. However, plaintiffs are limited to actual damages if the state does not require actual malice to be shown.

DEFENDANT'S STATEMENTS ARE NOT TRUE

124. Whenever questioned why using “Chinese virus” and other similar terms, Defendant always explained it came from China and claimed “I want to be accurate.” However, Defendant has more than once said the virus “has 19/20/22 different names” and “whatever you want to call it,” at campaign rallies to his supporters. Such racially charged and reckless rhetoric demonstrates Defendant’s intention when using these inflammatory words was not about truth at all.
125. As presented in the above Statement of Facts/Timeline Science, both the WHO and the CDC concluded the new virus originated from bats, then jumped to human. A [Mount Sinai study](#) showed New York City’s first confirmed COVID-19 cases predominately came from Europe.
126. As aforementioned, the many diseases brought by the European colonists caused millions death among Native Americans, but were never labeled as “European”. The “Spanish Flu” did not originate from Spain but likely from Kansans, and the pandemic of influenza in 2009 started in North America but we don’t call it the North American flu.
127. Foxconn has been Apple's longest-running partner in building these devices. It currently assembles the majority of Apple's iPhones in its factory in Shenzhen, China. Should iPhone be called Chinese iPhone? Of course not, because iPhone has been designed by Apple in the U.S.
128. The origin of the virus was unknown one year ago, and still remains unknown at the present. The Director of National Intelligence testified to the Senate on April 14, 2021 that the U.S. intelligence community does not know exactly where, when and how the COVID-19 virus was transmitted initially. The accurate statement would have been: (1) the virus originally came from an animal rather than human, (2) where the virus started from remains unknown, (3) the first outbreak of this coronavirus took place in China, and (4) the virus has spread from one person to another regardless of race and ethnicity.

129. Hence, Defendant's defamatory statements and his explanation of "because it came from China" was not supported by scientific evidence. As a result, Defendant's numerous uses of "Chinese virus" and other similar terms did not fit the definition of accuracy and truth. And as aforementioned, his intention was not about the truth.

DEFENDANT'S PATTERN OF DISREGARDING SCIENCE

During the pandemic, Defendant demonstrated a pattern of ignoring and disregarding scientific facts and medical experts' advices because he felt the truths would have made him look bad for his reelection.

130. From Mar. 19 to May 20, 2020, Defendant embraced and pushed unproven treatments for coronavirus, especially anti-malarial drug hydroxychloroquine, which a new study found is linked to an increased risk of death in patients. Forbes provided a timeline. ([Forbes 05/22/2020](#))

131. On April 3, at the White House news conference Defendant said, "The C.D.C. is advising the use of nonmedical cloth face covering as an additional voluntary public health measure. So it's voluntary. You don't have to do it. They suggested for a period of time, but this is voluntary. I don't think I'm going to be doing it." ([CNBC 04/03/2020](#))

132. On April 23 2020, Defendant touted sunlight, disinfectant and hydroxychloroquine as effective treatments, none of which was supported by reliable scientific and medical study. The manufacturer of Lysol and Dettol, two disinfectants that commonly use bleach for cleaning household surfaces, had to made the following statement on April 24, 2020: "As a global leader in health and hygiene products, we must be clear that under no circumstance should our disinfectant products be administered into the human body (through injection, ingestion or any other route)." ([NPR 04/24/2020](#))

133. Defendant began pinning the blame on testing as early as June 15, when in a tweet he said that because U.S. testing "is so much bigger and more advanced than any other country ... it shows more

cases.” He called testing a “double edged sword” because it is “good to” have, but “[m]akes us look bad.” However, the United States’ testing program has not performed as many tests as other countries given the size of the nation’s outbreak. And while testing can explain some of the additional cases, it fails to account for all of them, as the proportion of positive tests is increasing in many states. At a June 20 campaign rally in Tulsa, Oklahoma, Defendant once again called testing a “double-edged sword” and even claimed that he had asked his “people” to “slow the testing down, please.” The White House said the comment was a joke, only to have Defendant tell a reporter two days later, “I don’t kid.” This incident also begs the question who was lying then? ([FactCheck.org 06/25/2020](https://www.factcheck.org/2020/06/25/trump-testing-joke/))

DEFENDANT’S PATTERN OF SPREADING FALSEHOODS

During the pandemic, Defendant made numerous untrue statements, here are some examples captured on <https://www.youtube.com/watch?v=HvE9hCZ-jaU>

134. On Jan. 22, Defendant said, " It’s one person coming in from China. We have it under control. It’s going to be just fine." ([CNBC 01/22/2020](https://www.cnn.com/2020/01/22/politics/trump-coronavirus/index.html))
135. On Feb. 10, Defendant said "it will go away in April because of heat."
136. On Feb. 26, Defendant said at a White House press conference that "within a few days, the 15 cases in the United States will drop to near zero."
137. On Feb. 27 Defendant said "one day it will disappear like a miracle."
138. Feb. 28 Defendant told his supporters at a rally, "This is their (Democrats') new hoax."
139. On Mar. 6, Defendant said during a visit at the CDC, "Everyone who needs a test can get a test."
140. On Jun. 20, Defendant said once again that the U.S. had more COVID-19 cases because the U.S. tested more, and said he has asked his people to slow down testing. White House staffers said Defendant was joking. Defendant then told reporters again two days later that he wasn't joking.

141. Since the beginning of the pandemic Defendant said at least 40 times that coronavirus would go away. ([WP 11/02/2020](#))

DEFENDANT'S PATTERN OF MISLEADING & SELF-CONTRADICTIONARY STATEMENTS

During the pandemic, Defendant demonstrated a pattern of making misleading and self-contradictory statements about the COVID-19 pandemic. The following facts are quoted from [NPR 09/09/2020](#):

142. According to the book, which is called *Rage*, Defendant told Mr. Bob Woodward on Feb. 7, 2020, "This is deadly stuff ... You just breathe the air and that's how it's passed. And so that's a very tricky one. That's a very delicate one. It's also more deadly than even your strenuous flu." According to the book, Defendant was warned in early January by national security adviser Robert O'Brien that the virus would be the "biggest national security threat you face in your presidency."

143. But at the time, Defendant was publicly saying that the virus was less of a concern. On Feb. 10, 2020 Defendant told supporters in New Hampshire: "Looks like by April, you know, in theory, when it gets a little warmer, it miraculously goes away." Later that month, Defendant tweeted that the virus was "very much under control in the USA."

144. And in March, he compared the novel coronavirus to the seasonal flu, saying in a Fox News interview, "We've never closed down the country for the flu."

145. About a month after the February conversation, Defendant admitted to Woodward that he had been playing down the virus's severity. "I wanted to always play it down," Defendant told Woodward on March 19, 2020. "I still like playing it down, because I don't want to create a panic."

DEFENDANT’S PATTERN OF SHOWING NEGLIGENCE

During the pandemic, Defendant demonstrated a pattern of showing apathy to people’s health and lives, and negligence to his duty and responsibility to the country.

146. On Mar. 6, 2020, when asked during his visit to the CDC whether he felt the 3,500 passengers and crew members on the Grand Princess cruise ship should be brought ashore for coronavirus testing and, if need be, treatment, Defendant said: “They would like to have the people come off. I’d rather have the people stay [on the ship]. But I’d go with them. I told them to make the final decision. I would rather — because I like the numbers being where they are. I don’t need to have the numbers double because of one ship that wasn’t our fault.” ([MarketWatch 03/09/2020](#))

147. On Aug. 4, 2020 with the number of coronavirus death already over 100,000, Defendant said in an exclusive TV interview with *Axios* that “this is what it is” ([NBC News 08/04/2020](#))

148. On Sep. 13, 2020 Defendant told Woodward (Woodward) that the coronavirus would pass sooner or later, and that “Nothing more could have been done. Nothing more could have been done.” By that time, more than 167,000 Americans had died from COVID-19. ([MarketWach 09/13/2020](#))

149. On Sep. 21, 2020 with the number of COVID-19 death about to exceed 200,000, Defendant gave himself an A+ rating, the only bad thing is that the news media didn't I have to give a good rating. ([ABC News 09/21/2020](#))

150. Researchers at Stanford University reviewed Defendant’s 18 rallies held between Jun. 20 and Sep. 22, 2020 and analyzed COVID-19 data the weeks following each event. They found that the rallies ultimately resulted in more than 30,000 confirmed cases of COVID-19, and the rallies likely led to more than 700 deaths, though not necessarily among attendees. “The communities in which Defendant rallies took place paid a high price in terms of disease and death,” said B. Douglas Bernheim, chairman of Stanford’s economics department and a lead author of the paper, wrote. ([CNBC 10/31/2020](#))

DEFENDANT'S PATTERN OF COMMITTING ACTUAL MALICE

During the pandemic, Defendant demonstrated a pattern of committing actual malice.

151. Actual malice is a statement made with a reckless disregard for truth. Actual malice can be established through circumstantial evidence. High degree of awareness of falsity is required to constitute actual malice,

152. Since Defendant in his official capacity on a daily basis received the most comprehensive and up-to-date intelligence information and data about the COVID-19, any claim of being unaware would not hold up in this case.

153. The aforementioned significant different attitude among voters toward wearing mask demonstrates Defendant's words had serious consequences.

154. The aforementioned Stanford University research's findings about Defendant's campaign events demonstrates Defendant's disregard of science and facts had deadly consequences.

155. Defendant might not have had racist intentions in the beginning, however (1) very quickly he was told by people inside and outside of his administration how his choice of words would be perceived and how damaging consequence it would be for Chinese/Asian-Americans community, and ultimately (2) the intent matters less than the effect. By early March, 2020 racist acts and harassment against Asians had already surged and they continued to spike through March and into April (see details in Statement of Facts). Defendant's own Department of Homeland Security (DHS) issued a warning that white supremacists may exploit the crisis against Asian-Americans. While Defendant did not commit himself these terrible acts, elected officials and scientists have a responsibility for the way they talk about the virus – words matter. That is why the WHO has had a strict guideline since 2015 regarding the naming of diseases, a guideline followed by other world leaders.

156. The expressions "Chinese virus" and other similar terms personify the threat. Personification is metaphorical: its purpose is to help understand something unfamiliar and abstract (i.e. the virus) by

using terms that are familiar and embodied (i.e. a location, a nationality or a person). But as cognitive linguists George Lakoff and Mark Johnson have long shown, metaphors are not just poetic tools, they are used constantly and shape our world view. The adjective “Chinese” is particularly problematic as it associates the infection with an ethnicity. Talking about group identities with an explicitly medical language is a recognized process of Othering, historically used in anti-immigrant rhetoric and policy, including toward Chinese immigrants in North America. This type of language stokes anxiety, resentment, fear and disgust toward people associated with that group.

157. Metaphors also shape our world view by both highlighting and hiding certain aspects of a concept (Lakoff and Johnson). For instance, the expression “foreign virus” implies that the nation is a body facing an external threat identified as foreign. The nation-as-a-body is a common metaphor in the English language (think of expressions such as “head of state,” “head of government,” “long arm of the law”, etc.), but it also a metaphor used in anti-immigrant rhetoric as professor O'Brien has shown in his book, *Contagion and the National Body*. Defendant has associated immigrants with “disease coming into our country,” (June 11, 2019), “communicable disease” and “tremendous medical problem coming into a country” (Dec. 11, 2018), including during the 2015 primary campaign.

158. Associating the virus with foreigners also plays to Defendant’s supporters’ cognitive bias against outsiders and immigrants and their fear of contagion – racial, social, cultural or otherwise. Academic studies have shown a correlation between anti-immigration views, political conservatism and disgust sensitivity.

159. Defendant’s use of “Chinese virus” is also consistent with the aged-old political tactic of “Othering” to avoid blame for the pandemic by redirecting anger away from his own incompetent record which shows since the end of the first wave, the United States has consistently performed the worst by far in the world in terms of infection per capita, death per capita, and particularly it has only 4.2% of world population but has accounted 20%+ of global infections and global death (see Exhibit B for details). Trying to avoid blame is nothing new in politics. Research often finds that

politicians blame other politicians or public or private service providers when they want to escape blame. Foreigners are often blamed for new diseases.

160. All the facts presented above show, even though (1) the WHO, Defendant's own administration (CDC Director, Secretary of HHS), Congress, scientific and medical community, all repeatedly provided advices to properly call the new virus "COVID-19", (2) all repeatedly warned of damaging consequence of using the exact terms used by Defendant, and (3) all new outlets as well as FBI reported significant increase in racially charged incidents targeted Chinese/Asian-Americans, Defendant still knowingly and intentionally continued using such defamatory language in numerous occasions via various public platforms in his official capacity.

CONNECTION BETWEEN HATEFUL RHETORIC AND REAL-WORLD VIOLENCE

On [April 9, 2021, the Brookings Institution](#) publishes a very insightful report that summaries the connection between hateful rhetoric by political leaders and real-world violence. The relevant findings and analyses are presented as follows:

161. *There is no direct line between violent rhetoric and political violence if the speakers are careful not to name specific targets and means, and otherwise incriminate themselves. The risk of violence is nevertheless considerable. Although any individual — even one who cites President Trump or another leader when committing violence — may have multiple motives for acting, some sense of the problem can be traced by studies that show correlations between increases in hostile political rhetoric and violence.*
162. *Part of the problem is that leaders' remarks do not fade away after they are given. Incendiary rhetoric from political leaders against their political opponents, minority groups, and other targets is often quickly magnified. Leaders with large social media followings will see their remarks retweeted and otherwise shared with millions of followers. Leaders' rhetoric then drives the coverage of more traditional news outlets, which broadcast it to their viewers and listeners. Rhetoric from national leaders also serves as a cue for local figures, particularly if the national leaders have loyal personal followings. The local leaders' rhetoric in turn is amplified by social media and traditional outlets. Ordinary people play an important role too in spreading the message, sharing it with their own commentary with their friends and family.*

163. *As one expert noted, referring to President Trump's anti-Muslim and anti-Hispanic rhetoric: "The president's rhetoric has helped to shift discourse norms in our country such that it is more acceptable among more people to denigrate and attack other groups of human beings."*
164. *An academic study found that rhetoric did not change attitudes but rather emboldened individuals to express, and act on, pre-existing views they had once hidden. Anti-Muslim discourse prompted by remarks by candidate Trump grew on Facebook and other social media sites in 2016. This, in turn, led followers to increase their anti-Muslim tweets and to get more attention from cable news channels. In subsequent days, hate crimes against Muslims increased 32%, with a significant, but lesser, increase against the Hispanic community, another target of Trump's rhetoric. Specific tweets would lead to increases in hate crimes, with the level rising and falling depending on the prevalence of the social media activity.*
165. *Hateful rhetoric can also stir dangerous emotions. A study of violence in Sweden found that hateful speech spurs negative emotions toward the target community among listeners, and another study of European audiences found that exposure to politicians' violent rhetoric increases support for political violence among those surveyed. Such rhetoric also makes political violence against the target community seem more legitimate. In Germany, another study found that increases in anti-refugee sentiments on Facebook led to increases in violence against refugees: When Facebook had an outage, or when different events dominated the news, violence fell.*
166. *Incendiary rhetoric also creates a more dangerous political climate in general. An analysis of the manifesto issued by El Paso Walmart shooter Patrick Crusius, who killed 23 people, mostly of Hispanic heritage, found that he used words like "invasion" and "replacement," drawing on conspiracy theories promoted by conservative media hosts. Another study found the politicians' hate speech increases political polarization and that this, in turn, makes domestic terrorism more likely.*
167. *A spiral of reciprocal radicalization is a particular danger. Fringe groups in the targeted population can exploit hateful rhetoric directed against them, justifying their own violence and mobilizing additional support. The risk of reciprocal radicalization can be overstated, but even a low probability of it occurring is of concern, as it can worsen violence from both sides and empower even more demagogues.*
168. *Leaders lead. That truism highlights an obvious point when considering violent rhetoric: violence against whom? Political rhetoric not only highlights the problem but also the obstacles to solving it, often in the form of supposedly dangerous individuals and communities. Thus, if a leader targets them rhetorically, violence may increase sharply against communities that, in the past, had experienced relatively little violence.*
169. *Some individuals charged with terrorism-related crimes claim that the rhetoric of President Trump and right-wing news media convinced them of the danger of Muslims and other groups and led them to act. A 2020 news report found that 54 cases involving assaults and threats were linked to individuals who invoked Trump and his rhetoric during their actions. Of these, 41 cases involved pro-Trump violence, and 13 cases involved supposed defiance of Trump. A number of participants in the Capitol riots saw themselves as loyal soldiers for President Trump and claimed they were "awaiting direction" regarding how to act.*
170. *After President Trump tweeted out the phrase "Chinese virus" as COVID-19, the use of the term exploded, according to a study in the American Journal of Public Health. Many of the tweets had*

virulent anti-Asian sentiments. Reporting from StopAAPIhate.org indicates that numerous hate incidents occurred after this tweet, with many falsely linking Asian-Americans to the virus.

171. *Given the increased likelihood of violence, the targeting of particular communities, and a possibly fitful law enforcement response, it is logical that communities may experience more fear. This fear can hold, however, even when actual levels of violence are low: The perception fueled by hateful rhetoric overcomes the reality. Polls of Americans show that over 75% believe that heated language makes political violence more likely. Concerns were particularly pronounced among Black, Hispanic, and Asian American and Pacific Islander communities.*
172. *There is a deceptively simple answer to the problem of incendiary rhetoric: Politicians should exercise restraint themselves and condemn their fellow leaders when they cross the line that separates inspiring their followers from encouraging violence. Unfortunately, this advice is unlikely to be heeded.*

DEFENDANT'S STATEMENTS HAVE HIGH IMPACTS

Polls after polls show Defendant's choices of words indeed have significant impact.

173. On Jun. 8, 2020, the latest NBC News/Wall Street Journal poll shows that a person's mask-wearing habits could indicate how they'll vote in the 2020 presidential race. ([NBC News 06/08/2020](#))
- a. Sixty-three percent of registered voters said they "always" wear a mask when they're in public outside of their house. Biden leads Defendant by 40 points in this group: 66% to 26%.
 - b. Twenty-one percent of voters said they "sometimes" wear a mask. Defendant leads Biden by 32 points in this group: 62% to 30%.
 - c. Just 15 percent of registered voters said they don't tend to wear a mask. Defendant leads Biden by 76 points in this group: 83% to 7%.
 - d. Biden and Defendant have sparred on whether it's appropriate to wear a mask. Defendant has forgone wearing a mask in nearly all of his public appearances since the CDC updated its guidance to suggest Americans wear masks in public, especially when social distancing is not possible. Biden, meanwhile, has been photographed with a mask nearly every time he has left his Delaware home.

174. [On Sep. 16, 2020, the Washington Post](#) reported that racialized language such as “Chinese virus” and other similar terms have prompted many Americans to blame Chinese Americans for COVID-19. The study gave a short description of the pandemic to two groups of respondents, one version called the coronavirus as “COVID-19,” the other version called it the “Chinese virus.” Respondents were then asked a number of closed- and open-ended questions about who they believed was most responsible for the spread of the virus in the United States.

- a. Among the group who read with “Chinese virus,” 47 percent picked Chinese Americans from a list of ethnic groups as the one most responsible for the pandemic;
- b. Among the group who read with “COVID-19”, 39 percent picked Chinese Americans.
- c. Given that Asian Americans as a group make up only about 6 percent of the U.S. population, and that the strain impacting the hardest-hit regions came from Europe, there is simply no basis to single out Chinese Americans for blame.

175. The Milwaukee Journal Sentinel reviewed data from the FDA's database of side effects from drugs. In the first six months of 2020, 293 Americans died after taking hydroxychloroquine, compared to only 75 such deaths in 2019. More than half of the people who died after taking the drug were taking it for COVID-19. Despite Defendant's endorsement of the drug, the FDA and top health experts have advised against using hydroxychloroquine to treat coronavirus. Studies suggest it offers no benefit for COVID-19 patients, and can cause dangerous heart arrhythmias. However, after Defendant's endorsement, some doctors began prescribing it. The number of hydroxychloroquine prescriptions filled in one week in March was more than 2,000 percent higher than fills for the same drug a year prior. As more studies warned of the alarming arrhythmias seen in trial participants treated with the drug and suspiciously high death rates, the FDA issued a warning that the drug should only be used to experimentally treat COVID-19 under the close supervision of a doctor. By June, the agency revoked its emergency use authorization for hydroxychloroquine to treat coronavirus altogether. ([DailyMail 08/07/2020](#))

176. [American Journal for Public Health published on April 7, 2021](#) the results of its study to examine the extent to which the phrases, “COVID-19” and “Chinese virus” were associated with anti-Asian sentiments. Data were collected from Twitter’s Application Programming Interface, which included the hashtags “#covid19” or “#chinesevirus” from March 9 to 23, 2020, corresponding to the week before and the week after Defendant’s tweet with the phrase, “Chinese Virus.” The analysis focused on 1,273,141 hashtags. Results: One fifth (19.7%) of the 495 289 hashtags with #covid19 showed anti-Asian sentiment, compared with half (50.4%) of the 777 852 hashtags with #chinesevirus. When comparing the week before March 16, 2020, to the week after, there was a significantly greater increase in anti-Asian hashtags associated with #chinesevirus compared with #covid19 ($P < .001$). Conclusions: Our data provide new empirical evidence supporting recommendations to use the less Stigmatizing term “COVID-19,” instead of “Chinese virus.” Researchers also found that the timing of the former president's tweet was significant. The first time he used "Chinese Virus" was March 16, 2020, and the following week saw an increase in anti-Asian hashtags and a rise in hate crimes. International health officials purposely avoided attaching geography to the virus, as had been done in the past, to avoid casting blame, but Defendant insisted on tying China to COVID-19 at every turn. ([ABC News 03/18/2021](#))

THE FIRST AMENDMENT DOES NOT APPLY IN THIS CASE

177. The First Amendment protects ordinary individual from government’s censorship. If an ordinary individual says “Chinese virus” and other similar terms, Plaintiff would not file this lawsuit because such individual has no power, no command of federal agencies, no daily intelligence reports, no bully pulpit, no platforms, no followers, etc., therefore he/she has no duty, no responsibility, very little influence or impact.

178. According to [William Barr's memo to DOJ dated June 8, 2018](#) (page 10), “[President] he alone is the Executive branch. As such, he is the sole repository of all Executive powers conferred by the Constitution.” While such interpretation of presidential power was questionable to say the least, Defendant was obviously very pleased, and handpicked Barr as his second A.G. on Dec. 7, 2018. In fact, Defendant said in the public multiple times that “Article II allows me to do whatever I want.” Hence Defendant fully believes he has enormous power. ([Compiled by WashingtonPost 07/24/2019](#))
179. Instead of being an ordinary person, Defendant held the most powerful federal government office in the country. In Barr's memo, Defendant alone is the executive power. The higher official/constitutional authority one holds, the greater official/constitutional obligation/responsibility this person bears. Every day while in office, Defendant received the most comprehensive intelligence brief and the best scientific/medical advice from his administration officials and experts, hence he would not be able to claim ignorance of (1) this virus originated from animal, (2) the WHO guidelines for naming virus/disease, (3) the significant increase in anti-Asian incidents since his use of defamatory terms.
180. Therefore, (1) Defendant shall be held accountable for his actions and words, (2) he failed his office's solemn responsibility to represent all Americans, (3) he betrayed the oath of office to defend and preserve the Constitution that starts with mandate to maintain justice, domestic tranquility, and general welfare for “We the People” - all Americans, Whites, Blacks, Hispanic, Asian, Native Americans, and so on, and ironically, (4) it is a large group of ordinary Americans is in dire need of protection from Defendant's defamatory statements.
181. Our Founding Fathers intended for the First Amendment to protect ordinary people and the press from dictators, rather than for the First Amendment to allow Defendant, who held the most powerful constitutional office, to knowingly and intentionally repeated lies and spread defamatory statements.
182. Therefore, the First Amendment does not apply to Defendant in this case.

THE SOVERIGNTY & PRESIDENTIAL IMMUNITY DO NOT APPLY IN THIS CASE

183. The Sovereignty Immunity is an antiquated legal doctrine that originated at the time with the meaning of “the king can do no wrong.” Had this been true, there would have been no justification for our founding fathers to declare independence.
184. In 1977, in an interview Nixon: “Well, when the president does it, that means that it is *not* illegal.” Had this been true, Nixon could have continued his lies and cover-up without any consequence.
185. The Supreme Court decisions in *United States v. Nixon*, 418 U.S. 683 (1974), *Clinton v. Jones*, 520 U.S. 681 (1997) and *Trump v. Vance, et al.* repeatedly affirmed the constitutional principle of “No One is Above the Law.”
186. In *Nixon v. Fitzgerald*, 457 U.S. 731 (1982), the Supreme Court held “The President's absolute immunity extends to all acts within the “outer perimeter” of his duties of office.” However, close examination reveals the Nixon v. Fitzgerald decision is not applicable to the case on hand for the following reasons.
- a. Arthur Ernest Fitzgerald was a discharged former Air Force employee who could pursue a civil damages suit against former President Richard Nixon claiming that he lost his position as a contractor for the U.S. Air Force because of testimony made before Congress in 1968, he alleged President Nixon retaliated for his whistleblowing testimony. According to the Constitution and the federal government existing regulations, guidelines and chain of command, the president has the authority to nominate, appoint and fill positions. This is well within *the “outer perimeter” of his duties of office.*
 - b. In the present case, Plaintiff is a civil rights organization taking legal action on behalf of its community, which has been the victim of increasing racial discrimination, verbal insults and even physical attacks since the COVID-19 outbreak, and there has been indisputable evidence for the connection between Defendant’s defamatory words and the increasing incidents of

anti-Chinese/Asian Americans. Neither the Constitution nor the federal government's existing regulations and guidelines grant the authority to any officeholder to repeatedly spread baseless defamation against the WHO guidelines and the advices from his own administration officials, e.g. HHS Secretary and CDC director.

- c. Any government official or civil service employee who **faithfully** executes his/her official duty in the public interest according to the relevant and appropriate policies, procedures, regulations and instructions shall not be exposed to legal jeopardy. However, this is clearly not the case for what Defendant has done in this lawsuit. When Defendant repeatedly used various forms of defamatory terms and said the virus has "19 different names," at campaign rallies, it clearly shows lack of good faith and due care for his official responsibility.

187. Justice Powell wrote for the Court that immunity applies to "acts within the 'outer perimeter' of the President's official responsibility." Notably, "outer perimeter" does not equate "complete" or "all-inclusive." Justice Powell and the Court did not give a blank check for complete immunity without perimeter. In another word, the president is not categorically immune to all civil litigation for conduct taking place while he/she is in office. Plaintiff respectfully argues that, neither the Constitution nor any Supreme Court precedent, nor the federal statues, regulations and guidelines define repeatedly and knowingly spreading baseless defamatory terms against one particular group of Americans as an official duty. There is simply neither enumerated power nor statutory authority for any office-holders to make defamatory statements against one group of citizens.

188. Justice Powell also mentioned "the need to maintain prestige as an element of Presidential influence." Plaintiff respectfully argues that by any common sense, basic decency, and reasonable logic, Defendant's repeatedly and knowingly spreading baseless defamatory terms against one particular group of Americans does not meet the Court's expectation of "the need to maintain prestige" being a president or any office-holder.

DEFENDANT’S STATEMENTS WERE MADE WITH NO PRIVILEGE

189. On Mar. 15, 2017, in an interview with Tucker Carlson of Fox News, Defendant said “Let me tell you about Twitter, I think that maybe I wouldn’t be here if it wasn’t for Twitter” Lump together his followers on Twitter and Facebook, Instagram, @Potus and “lots of other things”, Trump said he has the combined ability to publish directly to as many as 100 million people. “Twitter is a wonderful thing for me, because I get the word out ... I might not be here talking to you right now as president if I didn’t have an honest way of getting the word out.” ([the Guardian 03/15/2017](#))
190. On Jun. 6, 2017, when asked whether Defendant’s tweets qualify as official statements on behalf of the White House, Press Secretary Spicer said Defendant “is the President of the United States, so they’re considered official statements by the President of the United States.” ([Time 06/06/2017](#))
191. On Nov. 13, 2017, the Department of Justice on Monday told a federal district court judge In Washington, D.C. that Defendant’s tweets are “official statements of the President of the United States.” ([ABA Journal 11/14/2017](#))
192. On April 5, 2021, the Supreme Court dismissed Defendant’s appeal and left the decision by the district court and the second circuit court intact. "These tweets are published by a public official clothed with the authority of the state using social media as a tool of governance and as an official channel of communication on an interactive public platform," appeals court Judge Barrington Parker wrote. ([USA Today 04/05/2021](#))

COUNT ONE – DEFAMATION PER SE

193. Plaintiff repeats, reiterates and realleges each and every allegation contained in Paragraphs 25-94 of the Complaint as if fully set forth herein at length.
194. Defendant’s Statements were defamatory because they have not been supported by scientific study and factual evidence

195. Defendant's Statements were defamatory per se because they have exposed all members of Plaintiff's community, i.e., Chinese/Asian Americans, to public discrimination, hate, contempt, ridicule, verbal abuse and physical violence as reported in many incidents across the country.
196. Defendant has acted with fault, negligence and actual malice. Defendant's use of different numbers "19"/ "20"/ "22"-different names and "whatever you call it" in his campaign speeches more than once showed his intention was never about the truth at all.
197. Defendant's defamatory statements, whether taken individually or together in their cumulative impact, damaged Plaintiff and its community.
198. Defendant cannot deny the fact that he has been made aware that (1) there was no conclusive scientific study and factual evidence about the origin of the novel virus, (2) the WHO/CDC guidelines for naming such virus, (3) his words have significant impact – as confirmed by multiple studies/polls - on his supporters, who believed his Statements and often translated them into actions.
199. Defendant's defamatory Statements and implications on numerous occasions have clearly identified and would be reasonably understood to be directed to Plaintiff and its community.
200. Defendant has repeatedly made these defamatory Statements on numerous occasions in his official capacity at various platforms to the public without any applicable privilege.
201. Office comes with duty. Authority comes with obligation. Holding the highest office in the country, Defendant had failed his duty and obligation when he repeatedly making defamatory statements targeting Chinese American community thereby contributing to the increasing incidents of anti-Asian American communities.

COUNT TWO – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

202. Plaintiff repeats, reiterates and realleges each and every allegation contained in Paragraphs 95-119 of the Complaint as if fully set forth herein at length.

203. Defendant further committed the intentional infliction of emotional distress by repeating various defamatory statements against experts' advice, scientific guidelines of the WHO and CDC and the warnings from his own DHS and FBI, and in betrayal of the Office of the President's duty to serve in the best interests of ALL Americans.
204. Defendant's pattern of using his bully pulpit to intentionally target a racial minority during the pandemic was extreme and outrageous, and so beyond the bounds of decency, and the presidential norm for that matter, that it is regarded as atrocious and utterly intolerable in a civilized democratic society.
205. Defendant's extreme and outrageous conduct was carried out throughout the pandemic with reckless disregard of whether such conduct would cause Chinese Americans to suffer emotional distress.
206. Defendant's extreme and outrageous conduct indeed has caused members of the Plaintiff organization and to a large extent Asian Americans emotional distress and resulted in an unmistakable rising up trend of racial violence against Chinese Americans and Asian Americans from New York to California.
207. Leaders are the ones with power. Power comes with responsibility. Through his statements in the months since the outbreak of COVID-19 pandemic and speaking from his position of highest executive authority, Defendant has planted the seeds to create a public environment that is hostile to Plaintiff's community. As listed in the above Paragraphs 95-119, the victims of anti-Asian Americans incidents included not only ordinary people but also well-known public figures (CNN reporter, NBA basketball player). All of these victims have expressed feelings of hurt, angry, unsafe, intimidated, and fear. In particular, the damaging impact on young Asian American students will be long lasting.
208. As a result, members of the Plaintiff organization fear for their lives, worried if they would not be able to return home unharmed to their family when they step out to work or do grocery shopping.

209. For the foregoing reasons, Defendant is liable for intentional infliction of emotional distress and for all damages arising therefrom.

COUNT THREE – NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS

210. Plaintiff repeats, reiterates and realleges each and every allegation contained in Paragraphs 95-119 of the Complaint as if fully set forth herein at length.

211. Defendant further committed the negligent infliction of emotional distress by continuing his baseless defamatory statements while ignoring the extensive reports of increasing Anti-Asian Americans incidents by all mainstream news media, and disregarding repeated calling by the scientific and medical experts, Congress, and Asian Americans communities for change in Defendant's defamatory and racially biased rhetoric.

212. Leaders are the ones with influence. Influence comes accountability. Defendant admitted himself that his words have huge impact on his followers. One's sphere of influence determines one's sphere of accountability. Holding the highest and most powerful office in the country, Defendant was obligated to fulfill his duty and responsibility for the common welfare of all Americans regardless of races and ethnicities, and must be held accountable for the hostile environment he helped magnified.

213. Defendant owed a duty of care to Chinese Americans such as members of the Plaintiff organization in that they would not be racially discriminated against.

214. Defendant's conduct breached this duty, unreasonably endangering their physical safety or caused them to fear for their physical safety.

215. Defendant's conduct both as President of United States of America and as a former president was extreme and outrageous.

216. Defendant's conduct proximately caused the emotional distress suffered by members of the Plaintiff organization.

PRAYER FOR RELIEF

217. On Jan. 6, 1941 Franklin D. Roosevelt reminded all Americans of Four Freedoms. As a result of Defendant's intentional defamatory statements, Plaintiff and its community has been deprived of Freedom from Fear.
218. The Covid-19 Hate Crimes Act, passed by both the Senate and the House with overwhelming bipartisan support, and signed by President Biden today on May 20, 2021, unequivocally confirmed the enormous harm suffered by Plaintiff and its community, and indisputably recognized the link between defamatory rhetoric and the hostile environment that has yield significant rise in verbal and physical attacks on Plaintiff and its community.
219. Wherefore, Plaintiff respectfully prays for the Court to enter an award and judgment in its favor, and against Defendant for:
- a. \$1.00 as an apology to every Asian American and Pacific Islanders (AAPI) living in the United States, total \$22.9 million based on the latest estimate by [the U.S. Census on Apr. 19, 2021](#).
 - b. Additional punitive damages in an amount to be determined at trial.
 - c. Reasonable and necessary attorneys' fees;
 - d. Reasonable and necessary cost of the suit;
 - e. Declarative and injunctive relief;
 - f. Such other and further relief as this Court deems just and appropriate.
220. Plaintiff will donate the award (a & b) to establish a museum that will showcase the history of Asian American and Pacific Islanders communities and their contribution to the United States of America.

JURY DEMAND

Plaintiff respectfully demands a trial by jury.

Dated: May 20, 2021

Respectfully submitted,

/s/ yuxi liu

Yu-Xi (Glen) Liu, Esq. (yl3022)
Attorney for Plaintiffs, (347)721-1383
602 39th Street, Brooklyn, NY 11232

Exhibit A**Comparison of COVID-19 Record between the United States and many Asian Countries**

As of January 20, 2021, the last day of Defendant's 4-year term, with only 4.2% of global population, the United States accounted for 25.2% of worldwide infected cases and 19.5% of worldwide deaths, the worst by far among all countries in the world.

In contrast, the countries in East Asia and Southeast Asia, where the early outbreak occurred and the population density are far higher than that of the U.S., have performed far better in this global pandemic than the U.S., and many of them are much less economically developed than the U.S.

Covid-19 Worldwide Tracking as of 01/20/2021										
World Total		96,142,794	1,233	2,056,241	26	7,794,798,739			1.23%	0.03%
Index	Location	Cases	...per 100K	Deaths	...per 100K	Country Population	Population Density per sqk	% of World Population	% of World Cases	% of World Deaths
1	United States	24,246,230	7,387	401,553	122	331,002,651	36	4.2%	25.2%	19.5%
2	India	10,581,823	774	152,556	11	1,380,004,385	464	17.7%	11.0%	7.4%
13	Mexico	1,668,396	1,308	142,832	112	128,932,753	66	1.7%	1.7%	6.9%
16	Iran	1,342,134	1,619	56,973	69	83,992,949	52	1.1%	1.4%	2.8%
19	Indonesia	927,380	343	26,590	10	273,523,615	151	3.5%	1.0%	1.3%
22	Canada	724,629	1,928	18,289	49	37,742,154	4	0.5%	0.8%	0.9%
26	Iraq	609,852	1,551	12,962	33	40,222,493	93	0.5%	0.6%	0.6%
30	Bangladesh	529,031	324	7,942	5	164,689,383	1,265	2.1%	0.6%	0.4%
31	Pakistan	524,783	242	11,103	5	220,892,340	287	2.8%	0.5%	0.5%
32	Philippines	504,084	466	9,978	9	109,581,078	368	1.4%	0.5%	0.5%
39	Japan	340,933	270	4,680	4	126,476,461	347	1.6%	0.4%	0.2%
42	Nepal	267,992	937	1,969	7	29,136,808	203	0.4%	0.3%	0.1%
60	Malaysia	165,371	518	619	2	32,365,999	99	0.4%	0.2%	0.0%
70	Myanmar	135,243	250	2,986	6	54,409,800	83	0.7%	0.1%	0.1%
83	Mainland China	88,557	6	4,635	< 1	1,439,323,776	153	18.5%	0.1%	0.2%
86	South Korea	73,518	142	1,300	3	51,269,185	527	0.7%	0.1%	0.1%
89	Singapore	59,157	1,037	29	1	5,850,342	8,358	0.1%	0.1%	0.0%
94	Sri Lanka	54,419	250	273	1	21,413,249	342	0.3%	0.1%	0.0%
129	Thailand	12,594	18	70	< 1	69,799,978	137	0.9%	0.0%	0.0%
134	Hong Kong	9,720	129	165	2	7,496,981	7,140	0.1%	0.0%	0.0%
174	Mongolia	1,568	49	2	< 1	3,200,000	2	0.0%	0.0%	0.0%
175	Vietnam	1,540	2	35	< 1	97,338,579	314	1.2%	0.0%	0.0%
182	Taiwan	868	4	7	< 1	23,816,775	673	0.3%	0.0%	0.0%
183	Bhutan	848	111	1	< 1	763,964	20	0.0%	0.0%	0.0%
193	Cambodia	448	3			16,718,965	95	0.2%	0.0%	0.0%
205	Macao	46	7			649,335	21,717	0.0%	0.0%	0.0%
207	Laos	41	1			7,275,560	32	0.1%	0.0%	0.0%

Source: <https://www.cnn.com/interactive/2020/health/coronavirus-maps-and-cases/>