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**pro hac vice* pending

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH

CENTRAL DIVISION

ROBERT L. HILD, JR., an individual,

Plaintiff,

vs.

CANDACE OWENS FARMER, a/k/a CANDACE OWENS, an individual; CANDACE OWENS, LLC, a Delaware limited liability company; and GEORGETOM, INC., a Delaware corporation,

Defendants.

FIRST AMENDED COMPLAINT

Case No. 2:26-cv-00896-DBB

Plaintiff Robert L. Hild, Jr., hereby amends his Complaint against Candace Owens Farmer, a/k/a Candace Owens; Candace Owens, LLC; and GeorgeTom, Inc. (collectively, "Defendants"), and for cause of action, alleges and avers as follows:

INTRODUCTION

1. Robert (Robby) L. Hild, Jr. is a private citizen who was in the process of building a happy and productive life far from the public spotlight until, through no fault of his own, he became one of the many targets of the popular podcaster and conspiracy theorist, Candace Owens Farmer, a/k/a Candace Owens ("Owens").

2. On September 10, 2025, the founder of Turning Point USA, Inc. ("TPUSA"), Charlie Kirk, was assassinated at Utah Valley University in Orem, Utah. The preliminary hearing for the suspected assassin, Tyler Robinson, recently concluded, and he will stand trial for Kirk's murder. Hild was in the audience in Orem that day, and he experienced the trauma of watching a horrific murder up close.

3. Immediately after Kirk's assassination and continuing to the present, Owens devoted portions of almost every episode of *Candace*—a very popular video podcast that garners millions of views—to pushing false, unsubstantiated, and ever-shifting narratives about Kirk's assassination.

4. As of September 2026, she has published over 150 hour-long episodes on the topic of Charlie Kirk's assassination and her conspiracy theories surrounding it.

5. Despite mountains of evidence pointing toward suspected assassin Tyler Robinson's guilt, Owens regularly peddles wildly speculative alternate theories, including claims that foreign actors (such as Ukraine, France and Israel), the United States military, the State of Utah, Utah Valley University, Kirk's former head of security (currently suing Owens for defamation in Tennessee), and even Kirk's widow Erika participated in Kirk's murder.

6. Most importantly here, Owens told her audience of millions in multiple podcast episodes that Hild—a private citizen in the crowd at the event where Kirk was assassinated—contributed to Kirk's assassination, had ties to malicious foreign actors, and was connected to a "gothic" and "communist" "underground," which she associated with the murder, among other abject and damaging falsehoods.

7. Owens neither cares about the truth nor the harmful effects her lies have on her targets. Whether her lies involve the powerful and famous (like the First Lady of France, whom Owens has repeatedly accused of being a man, leading to a defamation lawsuit in Delaware) or regular, everyday citizens like Hild, Owens' sole concern is the clicks, likes, and reposts that pad her wallet.

8. Owens' false statements about Hild have upended his life, irreparably damaged his reputation, and made him a target for verbal attack and physical threats from Owens' substantial following.

9. Hild twice asked Owens to retract the damaging falsehoods Defendants published about him, and she refused. Hild therefore brings this defamation action against Owens and her companies as the only remaining means of vindicating his reputation and protecting himself from further harm.

PARTIES, JURISDICTION, AND VENUE

10. Hild is an unmarried adult male and at all relevant times hereto is and was a citizen of the United States and is a resident of Utah, residing within the Court's Central Division.

11. Upon information and belief, Defendant Candace Owens Farmer, a/k/a Candace Owens, is a married woman and is a resident of Tennessee.

12. Owens hosts a video podcast entitled, *Candace*, which is published by Defendant Candace Owens, LLC.

13. Defendant Candace Owens, LLC ("COLLC") is a Delaware limited liability company with its principal place of business in Nashville, Tennessee. To the best of Hild's knowledge and belief, and as supported by Owens' and COLLC's allegations in other litigation, Owens is the sole member and the sole manager of COLLC.

14. Upon information and belief, COLLC manages Owens' social media accounts and oversees its content. Upon information and belief, COLLC publishes the *Candace* podcast episodes at issue in this Complaint to various social media platforms including X and Facebook; receives advertising and promotional revenue from those platforms; and financially benefited from the increased viewership and engagement generated by the defamatory content about Hild.

15. GeorgeTom, Inc. ("GTINC") is a Delaware corporation with its principal place of business in Nashville, Tennessee. GTINC owns and operates CandaceOwens.com, a website on which the *Candace* podcast is uploaded and published. Upon information and belief, GTIC also publishes or causes to be published *Candace* podcast episodes to YouTube, where Owens has approximately 6 million subscribers. Upon information and belief, Owens oversees and directs all content that GTINC publishes on CandaceOwens.com and YouTube. Upon information and belief, Owens is a shareholder, director, and/or officer of GTINC. Upon information and belief, GTINC directly published the *Candace* episodes at issue in this Complaint to CandaceOwens.com and YouTube, receives subscription and advertising revenue from those platforms, and financially benefited from the increased viewership and subscriber growth generated by the content concerning Hild.

16. Upon information and belief, Owens, COLLC, and GTINC operate as an integrated enterprise for the purpose of producing, publishing, and monetizing the *Candace* podcast and the Candace Owens brand. Owens serves as the public face, creative director, and on-air talent; COLLC manages and monetizes her social media presence; and GTINC operates podcast

production, the subscription website and content, and the YouTube channel. COLLC and GTINC share common management (that is, Owens), coordinate their publication activities, and collectively profit from the content produced and disseminated through their platforms. Both entities had actual or constructive knowledge of the implied defamatory content at issue; approved its publication by continuing to host, promote, and monetize the content; and failed to retract or remove the defamatory statements despite having the ability to do so.

17. Hild's claims here concern *Candace* episodes that center around the assassination of Charlie Kirk, which occurred in Orem, Utah.

18. Owens has conducted and is continuing to conduct an ongoing private "investigation" into Kirk's assassination.

19. Owens, individually and on behalf of COLLC and GTINC, has actively contacted Utah residents to gather information for the podcast, including obtaining information about Hild, which she included in episodes of her podcast.

20. This Court has subject matter jurisdiction under 28 U.S.C. §1332(a)(2) because there is complete diversity between the parties and the amount in controversy exceeds $75,000.

21. This Court has personal jurisdiction over Owens, COLLC, and GTINC because they have submitted themselves to Utah jurisdiction by transacting business within the state and causing tortious injury within the state.

22. Venue is proper in the Central Division of this District because the underlying incident giving rise to Hild's claims occurred in this Division, and Hild suffered damages in this Division. Also, key witnesses are residents of Utah, and Owens, individually, and on behalf of COLLC and GTINC, actively reached out to Utah residents to gather information and content for Owens's narrative which underlies Hild's claims against her.

ALLEGATIONS SUPPORTING ALL CAUSES OF ACTION

23. Hild values his privacy and has taken affirmative steps to maintain it, including maintaining a minimal social media presence.

24. Hild was born and raised in the state of Washington and attended college at Brigham Young University.

25. Hild is a devout member of the Church of Jesus Christ of Latter-day Saints.

26. Hild served as a full-time missionary for his church during which time he received training on the risks of social media activity.

27. Consistent with his beliefs and training on the risks of social media, Hild has always maintained a minimal social media presence.

28. Hild's personal, religious, and professional activities have been private in nature and not directed toward public audiences.

29. Hild does not use social media as a platform for public engagement, commentary, or self-promotion.

30. Prior to the events described herein, Hild set his Facebook, Instagram, and LinkedIn accounts to "private," restricting public access to his published content.

31. Hild's last social media post was on Instagram in July of 2023.

32. Hild's Facebook accounts were dormant for several years well before the events giving rise to this Complaint.

33. Hild was educated and trained as a data scientist and worked in this field both as an employee and as a freelancer. Hild is currently exploring other career options.

A. Hild Attended the TPUSA American Comeback Tour at UVU Campus.

34. On or about September 10, 2025, Hild and his friend Shaner Broderick

("Broderick") made plans to attend the TPUSA American Comeback Tour at Utah Valley University ("UVU") in Orem, Utah (the "Event").

35. The Event was hosted by Charlie Kirk ("Kirk"), a prominent conservative political activist and commentator, and founder of TPUSA, an organization with the mission to identify, educate, train, and organize students to promote the principles of fiscal responsibility, free markets, and limited government.

36. At or around 11:00 a.m. on the Day of the event, Broderick and his sister picked up Hild at his home.

37. The three friends drove to Broderick's grandmother's house ("Grandma's House"), parked the car in her driveway, and walked to the Event at UVU, which was less than half-a-mile away.

38. At approximately 11:25 a.m., the three friends arrived at the Event.

39. Before the Event started, Hild and Broderick met up with members of their church who were also in attendance at the Event, including C.B.

40. Hild and his friends were located approximately 15–20 yards from the stage where Kirk was expected to speak.

41. Prior to the Event, at approximately 11:52 a.m., C.B. recorded video footage of the crowd, which includes shots of Hild in the crowd.

42. Before and after this video footage, Broderick's sister also took several photos and videos which captured Hild in the audience. Various photojournalists and livestreams also incidentally documented Hild in the audience.

43. At the Event, Hild was wearing a grey t-shirt with a Washington Nationals logo, blue shorts, light colored Nike athletic shoes, and a black hat with a Nike logo.

44. The Event began at approximately 12:00 p.m., when Kirk took the stage.

45. At or about 12:23 p.m., Kirk was fatally shot.

46. Upon hearing the gun shot, Hild, Broderick, and Broderick's sister ran back to Grandma's House, where they took shelter for several hours.

47. While they were at Grandma's House, Phil Lyman ("Lyman"), a former member of the Utah House of Representatives who is related to Broderick, and who also attended the Event, arrived accompanied by a staffer.

48. Hild and Lyman had never met prior to that date, and, even while at Grandma's House, they did not formally introduce themselves. Given the tragic shooting they had just watched, both were understandably focused on processing what they had just witnessed and watching news coverage, rather than interacting with each other.

49. Following the shooting, the neighborhood surrounding the UVU campus (including Grandma's House) was placed on lockdown as law enforcement searched for the suspect who shot Kirk.

50. Hild was at Grandma's House for several hours before returning home.

51. Upon information and belief, during the lockdown, law enforcement collected home surveillance systems and data from area residents, including several of Broderick's family members who lived near the campus.

52. Upon information and belief, this equipment and data was turned over to investigating authorities as a precautionary measure. Broderick's relatives had not reviewed the footage and were unaware of whether it contained any material evidence.

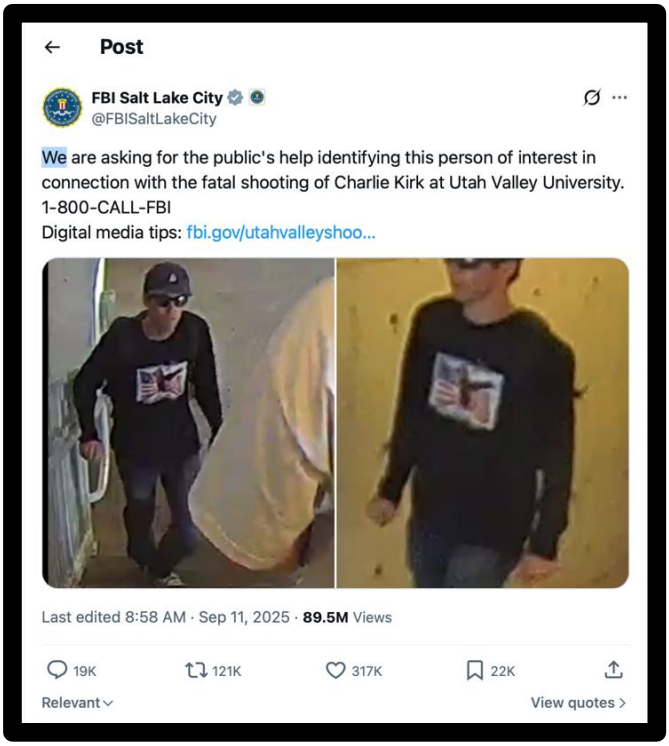
53. Upon information and belief, the surveillance systems and data collected from Broderick's relatives have not been returned.

54. Although he had witnessed the assassination of a prominent public figure, it never occurred to Hild to seek public attention, notoriety, or media exposure from his experience.

B. <u>The Suspected Shooter is Captured.</u>

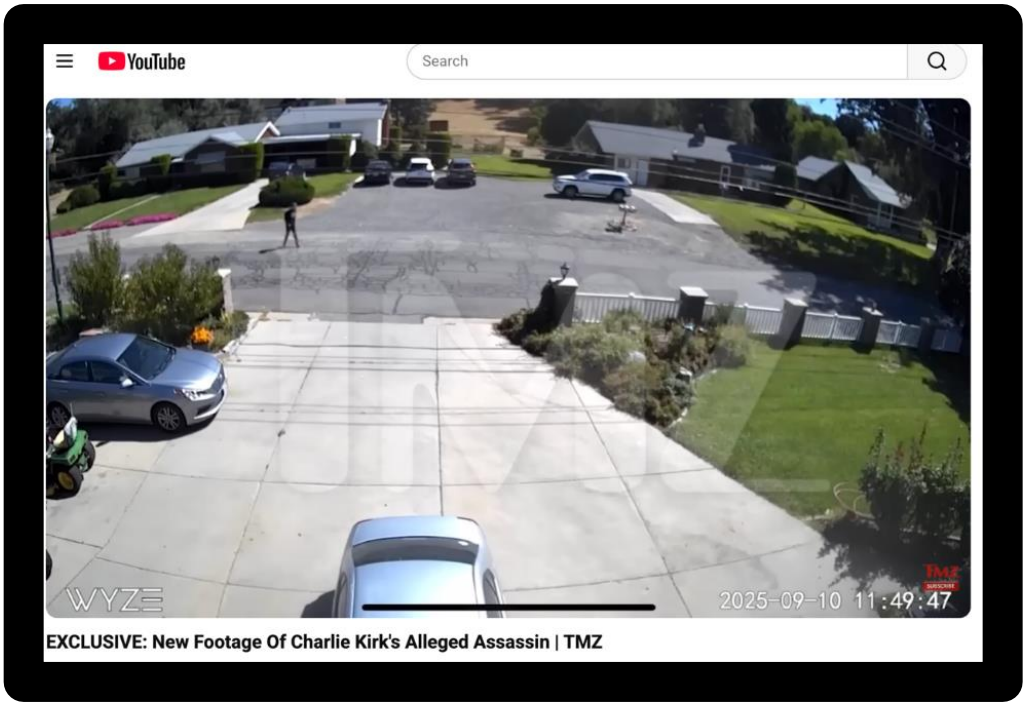
55. Following the Event, law enforcement requested that the public submit tips that may be related to the shooting.

56. On September 11, 2025, at approximately 9:58 a.m. MT, the FBI posted its first set of photographs of a person of interest, walking through a building wearing sunglasses, a hat, and a long-sleeve black t-shirt with an emblem of an American flag and bald eagle. The FBI referred to this same individual as the "shooter" on its website.



57. On September 11, 2025, at 4:11 p.m., TMZ publicized home surveillance footage of the suspected shooter walking toward UVU campus.

58. TMZ's footage depicts the suspected shooter walking past Grandma's House and toward the UVU campus at 11:49 a.m.



59. TMZ also published footage taken from what appears to be the same home surveillance camera, which shows an individual walking behind Grandma's House after the shooting:

60. On September 11, 2025, at approximately 6:17 p.m., the FBI released a second set of photographs of the person of interest in the same outfit, walking down a flight of stairs on UVU campus, including the following:

61. On September 11, 2025, at approximately 7:59 p.m., the FBI released video footage of the person of interest jumping off a rooftop and running away from UVU campus.

62. According to the Indictment dated and released to the public on September 16, 2025, the photographs of the suspected shooter in the stairwell are confirmed to have been taken at approximately 11:51 a.m. *See* Indictment, *State v. Robinson*, No. 70090584 (Utah 4th Dist. Ct. Sept. 16, 2025) ("At approximately 11:51 a.m., the suspect entered campus from the north. He is seen wearing a black shirt with an American flag in its center, a dark baseball cap, and large

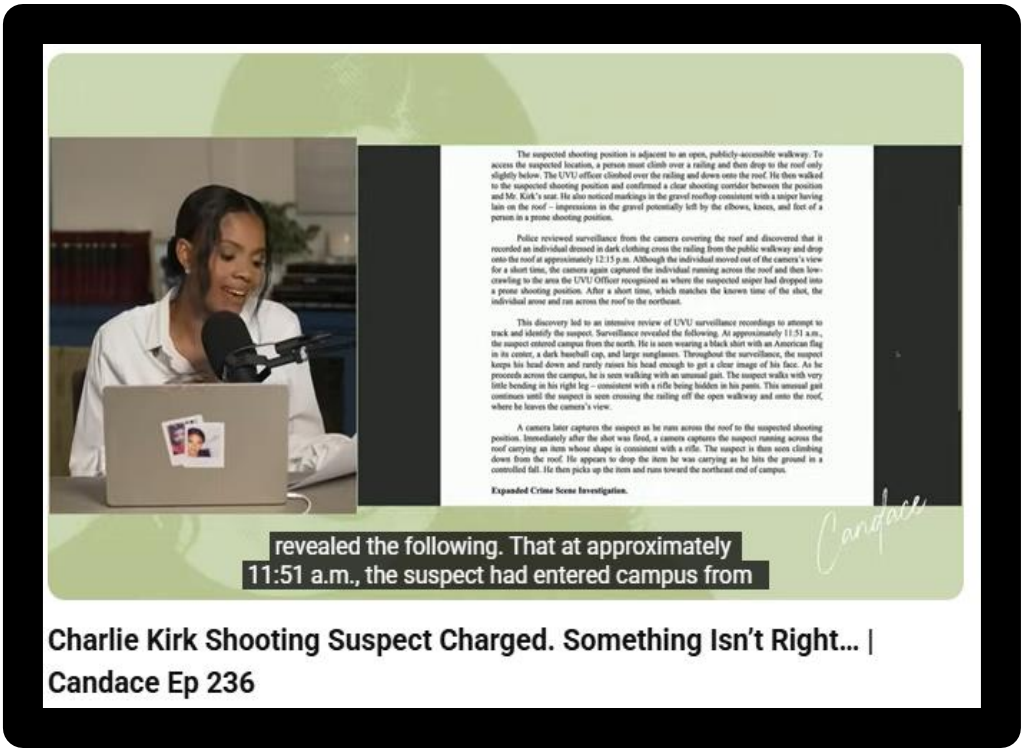
sunglasses.”).

63. Almost to the minute and at the exact time the suspect was walking through the stairwell, C.B.’s video footage documented Hild in the crowd in clothing that does not match that of the suspect.

64. On September 11, 2025, at approximately 10:00 p.m., Tyler Robinson was turned in by a family friend and retired police officer, Mike Mitchell, whom Owens would later include in a segment of her conspiracy theory about Hild. Robinson was also accompanied by his parents and booked into Utah County Jail.

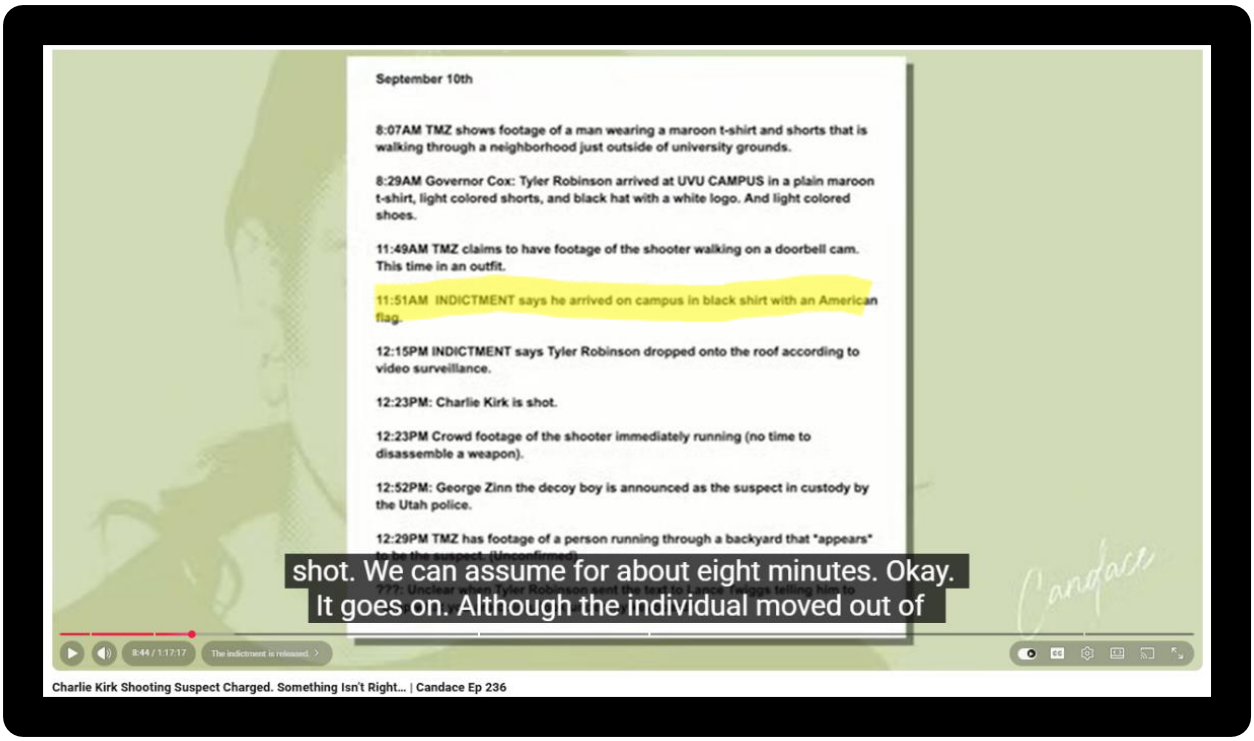
65. On the morning of September 12, 2025, Governor Cox held a press conference and announced that the suspected shooter, Tyler Robinson, was in custody. Governor Cox stated at the press conference, “violence is violence. And there is one person responsible for what happened here, and that person is now in custody.”

66. Owens obtained a copy of the Indictment shortly after its release and read a paraphrased version with her commentary to her audience Episode 236 of *Candace*, dated September 16, 2025. Referencing the Indictment, Owens told her audience that surveillance footage showed the suspect entering campus at approximately 11:51 a.m.:



*See Episode 236: Charlie Kirk Shooting Suspect Charged. Something Isn't Right…*CANDACE OWENS, YouTube (Sept. 16, 2025), https://www.youtube.com/watch?v=q7f8r-THr84, at 9:28.

67. Using information from the Indictment and other sources, Owens created and displayed on screen her own timeline of events for Kirk's assassination, which incorporated the 11:51 a.m. timestamp and other details drawn from the Indictment and other sources:



Id. at 8:44 (highlighting added).

68. Owens was therefore aware that law enforcement had connected the 11:51 a.m. timestamp to the FBI-released stairwell photographs depicting the suspect on the day of the shooting.

C. <u>Hild and His Friends Processed the Aftermath of the Shooting.</u>

69. After the release of the TMZ footage, many of Broderick's family and friends were concerned and confused about why Grandma's House was displayed on the news in relation to the Kirk assassination.

70. In response, on or about September 12, 2025, Broderick posted a video explanation on Instagram featuring areas around Grandma's House where the suspected shooter had travelled based on the TMZ footage and surveillance footage available to the public ("Post 1").

71. Post #1 included the following caption:

> I feel ok sharing this because it is already all over Fox and CNN. I was able to go back to Grandma's house this morning. I could not go back last night because the street was still blocked off. This is where he walked. This is where he escaped from.

> At my grandma's house where I was and where she was. Here is a walk-through. #Orem

72. Broderick's aunt can be heard in the background of Post #1.

73. Hild was not present during the filming of Post #1.

74. On or about September 14, 2025, Hild texted Broderick to ask him if he wanted to accompany him to visit Kirk's memorial at Timpanogos, as Hild had been considering writing and dropping off a letter to the Kirk family.

75. Hild responded to Broderick's text a few hours later, suggesting the two take a walk, which was something that the two friends would regularly do. Broderick responded: "I'm driving to my grandma's right now do you want to come. We're gonna walk the path." Hild agreed to meet Broderick at Grandma's House, hoping he would get to eat a home-cooked meal during the visit. Hild invited one of his roommates, Gernot Ohner, to tag along.

76. Hild had invited Broderick to go on a walk together, not for the purpose of performing any form of personal investigation but simply because the two friends habitually take walks after work.

77. Sometime after 6:00 p.m., the walk began. Once they began walking, Hild understood Broderick's desire to walk the path as a way for Broderick to process Kirk's assassination, and, wanting to be a good friend, he and Ohner accompanied him.

78. Hild and Ohner, following Broderick's lead, went on a walk that included some of the locations from the suspected shooter's route following the shooting as portrayed in media reports and surveillance footage available to the public.

79. The extent of their walk included walking through the neighborhood, the stairwell, and a small portion of Campus Drive.

80. They did not visit the UVU courtyard where the event and murder occurred, the crime scene, or any part of the UVU campus or its buildings other than a small portion of Campus Drive.

81. Hild and his friends did not perform any form of investigation (a suspect had already been charged and indicted) or reenactment, nor did they fully retrace the suspect's steps.

82. During the walk, Broderick took "selfies" of himself, Hild, and Ohner.

83. Two of the selfies were taken in the stairwell where the suspected shooter was captured on surveillance footage prior to the shooting and published by the FBI.

84. Hild did not think much of this behavior, as Broderick was often sentimental and liked to document aspects of his life in pictures.

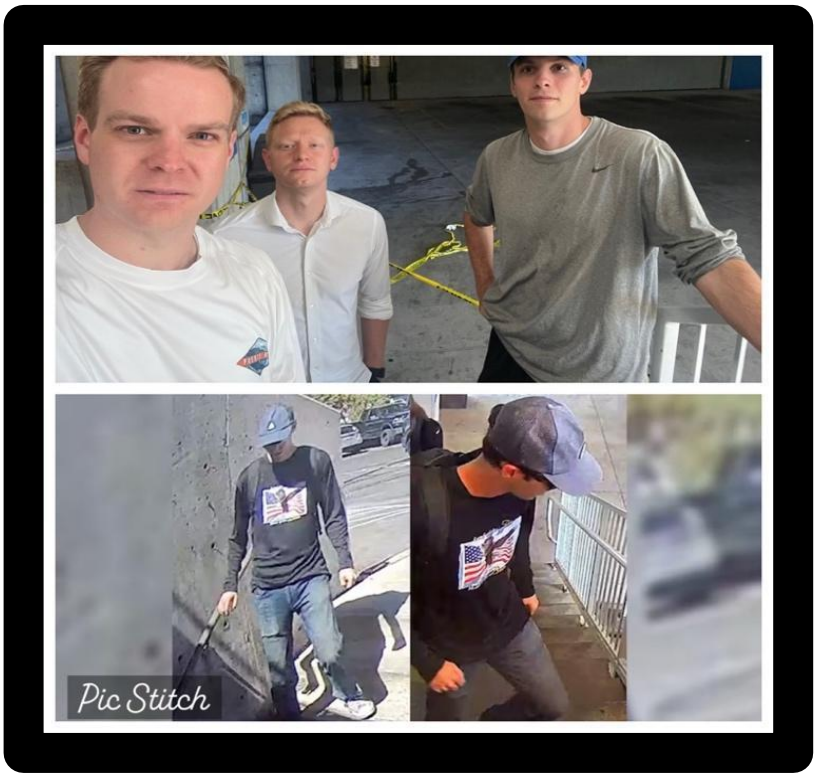
85. Following the walk, Hild and his roommate returned home.

86. Unbeknownst to Hild at the time, later that evening, Broderick posted a carousel of the photographs on Instagram ("Post 2").

87. Post #2 included the following caption:

> Took my friends to my grandmas house tonight and we retraced his steps and took pictures in the exact place security cameras caught him. I've been through this experience for the last few days. I'm still very glad to have attended, to support @charliekirk1776 and see him. The last pic shows Converse brand footprints. #orem #uvu #CharlieKirk

88. Using the application "Pic Stitch – Collage Editor," Broderick created a series of collage images depicting the photographs of the friends in side-by-side frames with the photographs that the FBI released of the suspected shooter.


Pic Stitch

BYU
Pic Stitch

89. Hild did not consent to Broderick posting these photographs and certainly did not agree to have his image posted side-by-side with the FBI's photographs of the suspected shooter.

90. Had Broderick requested Hild's permission before posting these photographs, he would have said "no."

91. Broderick did not tag Hild or Ohner in Post #2.

92. Hild neither saw nor "liked" Post #1 or Post #2.

93. Had he been aware of Post #2, Hild would have requested that Broderick remove it.

94. Hild was unaware that Post #1 and Post #2 existed until September 29, 2025.

95. At the time Post #1 and Post #2 were published, Broderick's Instagram profile was public, but it had fewer than 200 followers, consisting primarily of friends and family.

96. According to Broderick, many of his friends and family members were alarmed when they recognized Grandma's House from the TMZ footage, and as a result, he received a flood of concerning messages and phone calls.

97. Instead of responding to each individual message, Broderick published Post #1 and Post #2 to communicate to his family members that he was okay and to explain how images of Grandma's House's front yard ended up on TMZ and other news outlets.

98. Broderick never intended for these posts to be consumed by millions, and until Defendants published them on their widely viewed podcast, they only reached a limited audience.

99. On September 21, 2025, Hild, Broderick, and Broderick's sister attended the memorial service for Charlie Kirk at State Farm Stadium in Glendale, Arizona.

D. <u>Candace Owens' Podcast.</u>

100. Owens is the host of *Candace*, a video podcast.

101. Although Owens styles herself as an independent journalist, she often abuses that

label to traffic in false statements and conspiracy theories under the guise of reporting.

102. Owens has a massive social media following, including 6.2 million Instagram followers, 7.7 million X followers, 7.5 million Facebook followers, 529,000 Rumble followers, and 6 million YouTube subscribers.

103. Owens has promoted numerous conspiracy theories, including long debunked antisemitic tropes such as blood libel, Holocaust distortion, as well as a series advancing the false claim that Brigitte Macron is a man.

104. Owens is a defendant in multiple pending defamation lawsuits, including actions brought by Emmanuel and Brigitte Macron (the President and First Lady of France) and Brian Harpole (Kirk's former head of security).

105. Owens' online content is intended to inflame and attract attention through sensationalism and conspiracy theories—and ultimately, to drive clicks and revenue.

106. Owens regularly urges her followers to send her "tips" and tag her in social media posts so she can use that material as content and purported "evidence" for her fabrications.

107. Since Kirk's assassination, almost every *Candace* episode has in some way focused on Kirk's assassination. In total, Defendants have created over 150 episodes on the topic, most featuring over an hour of content each. These episodes purport to investigate and "debunk" public and law enforcement information about the killing and propose alternative conspiracy theories to her audience.

108. Owens' focus on Kirk's assassination resulted in a substantial spike in *Candace* subscribers.

109. By way of example, in August 2025, Owens gained approximately 50,000 new YouTube subscribers. Following Kirk's assassination and at the peak of the public's interest in the matter in October 2025, she gained approximately 700,000 new subscribers.

110. No blow is too low for Owens. Capitalizing on the popularity of her content about Kirk, Owens published a series entitled, "Bride of Charlie," which the *Hollywood Reporter* described as a "a serialized takedown of Erika Kirk, the widow of the man who first gave her a national platform."

111. Upon information and belief, Owens engages in this kind of conduct, not because she believes in the statements she makes or stories she tells, but because doing so generates content that drives increased viewership and, in turn, her profits.

E. <u>Owens Discovers Post #1 and Post #2.</u>

112. At some point between September 14, 2025, and September 28, 2025, Owens discovered Post #1 and Post #2.

113. On Monday September 29, 2025, at 10:10 a.m., Owens sent a direct message to Broderick on Instagram:

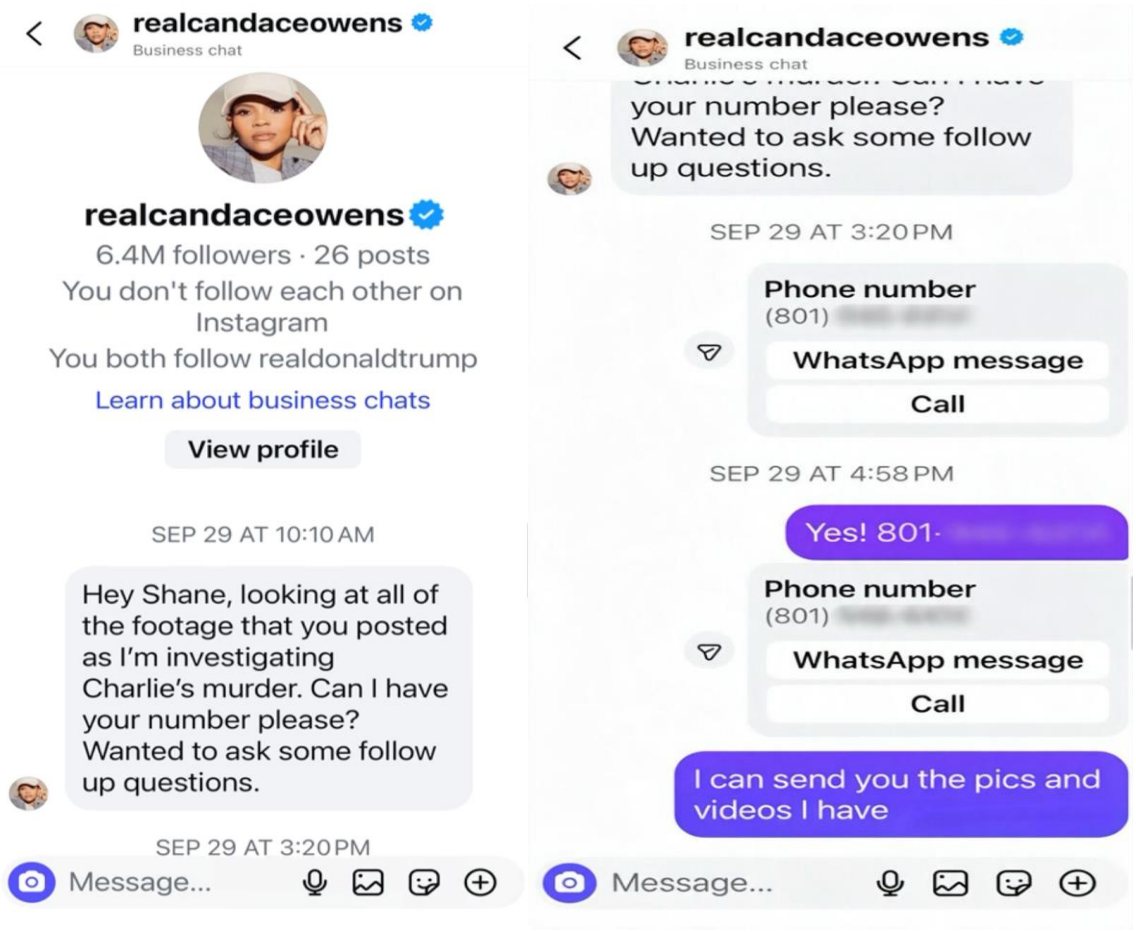
> Hey Shane[sic], looking at all of the footage that you posted as I'm investigating Charlie's murder. Can I have your number please? Wanted to ask some follow up questions.

114. At approximately 10:27 a.m., Owens sent a text message to Lyman requesting that he identify the two men in Post #2 with Broderick.

115. At 3:20 p.m., Broderick responded, "Absolutely," to Owens' Instagram message and provided his phone number so she could call him.

116. At 4:58 p.m., Broderick sent a follow up message providing his phone number a second time and conveyed the following message: "I can send you pics and the videos I have."

117. Owens never responded to Broderick's messages or contacted him at the number provided.



F. *Candace* Episode 244.

118. On September 29, 2025, Defendants published Episode 244 of *Candace*, entitled, "They are Lying About Tyler Robinson." As of September 2026, this episode has received over 4.1 million views (more than 3.4 million on YouTube, 500,000 on Spotify, and 228,000 on Rumble).

119. Defendants' apparent goal for this episode was exonerating Tyler Robinson by using a deceptively edited video and a false source while accusing the federal government of fabricating the evidence against Robinson. Owens further introduced Hild as a character to be used in future episodes.

120. Owens began Episode 244 by casting doubt on the details related to the arrest of Tyler Robinson:

> Last week, I have to tell you, I was contacted by a source who I vetted with information that answered a lot of the lingering questions that we've had about the investigation. Not all of them, but some of them, some of the big ones. Uh first and foremost, we were like, how exactly did it work? How did Tyler Robinson turn himself in as we were told, but also never confessed? And did he actually author those absurd Fed messages? Cuz I'm thinking no. Lastly, what was he doing at Dairy Queen? Doesn't really quite fit into our timeline. Also, don't expect this kid who just tried out being a stone-cold killer to really have an appetite. And why exactly did the feds withhold that information at Dairy Queen? And why are they allegedly stalking the Dairy Queen to see who comes in and out? ***Uh, well, we have the story that could possibly potentially answer all of those questions, and it certainly makes a lot more sense than the slop that the government is currently trying to feed us***.

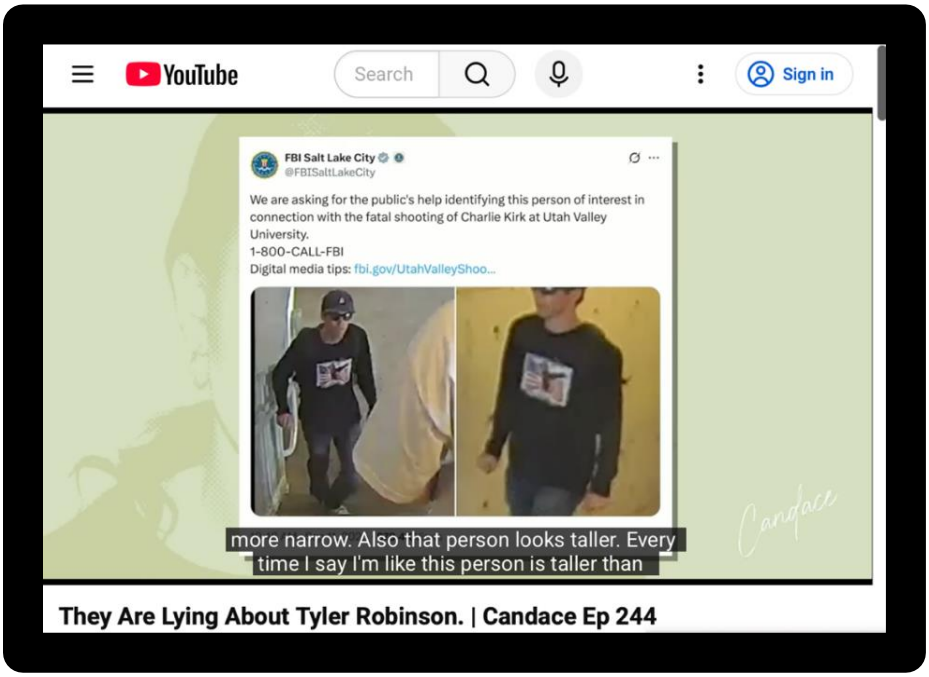
See Episode 244: They are Lying about Tyler Robinson, CANDACE OWENS, YouTube (Sept. 29, 2025), https://www.youtube.com/watch?v=ZGxnf5cj4Uw, at 1:08-2:10 (emphasis added).

121. Owens discussed one of the FBI photographs of the suspected shooter taken in the stairwell:

> Uh the family says that the photo of the young man that is coming up the stairs which was shared that blurry image is definitively not Tyler Robinson. And let me just say I never thought it looked like him. Neither did you. Okay. Face looks different. Face looks more narrow. Also that person looks taller. Every time I say I'm like this person is taller than Tyler Robinson. Tyler Robinson also appears to have full lips even though this image is blurry. We're not looking for someone that's got a that got fuller lips. And Tyler Robinson looks broader um than that individual walking. Right. ***So I I I'm on board with that person walking up the stairs is not Tyler Robinson because I feel like it was intentionally blurred. They also never gave us the footage at all because in order to blur it, they probably needed a static image.***

(*Id.* at 14:17-15:08.)

122. Owens displayed the image below while making those statements:



123. Owens tells her audience that she believes that the FBI photo of the suspect in black in the stairwell was intentionally blurred, suggesting that law enforcement and/or UVU had concealed the identity of the individual whom she asserted was not Tyler Robinson.

124. The absurdity of Owens' claim is underscored by Robinson's admissions of a guilt in a Discord conversation: "Hey guys, I have bad news for you all. it was me at UVU yesterday. im sorry for all of this. im surrendering through a sheriff friend in a few moments"; and "it was [me]. … look at the pictures from the surveillance footage. it was me. … im serious."

125. Owens, however, misrepresented Discord's public statement to give her audience the impression that Robinson's Discord messages were falsified.

126. Owens further told her audience that she was in contact with an individual named "Nick," a 20-year-old UVU student, as her "boots on the ground." Upon information and belief, Owens had more than one conversation with "Nick" concerning his connection to and "information" about Lyman. Owens acknowledged that "Nick" is not her source's true identity.

Upon information and belief, "Nick" is Truman Van Cott who was a former candidate for Orem City Council and is currently running for the Utah County Commission. Upon information and belief, Van Cott is a resident of Utah and was not 20 years old when he spoke to Owens like Owens repeatedly claimed.

127. From this connection with "Nick," Owens attempted to piece together a connection between Lyman and Tyler Robinson's arrest:

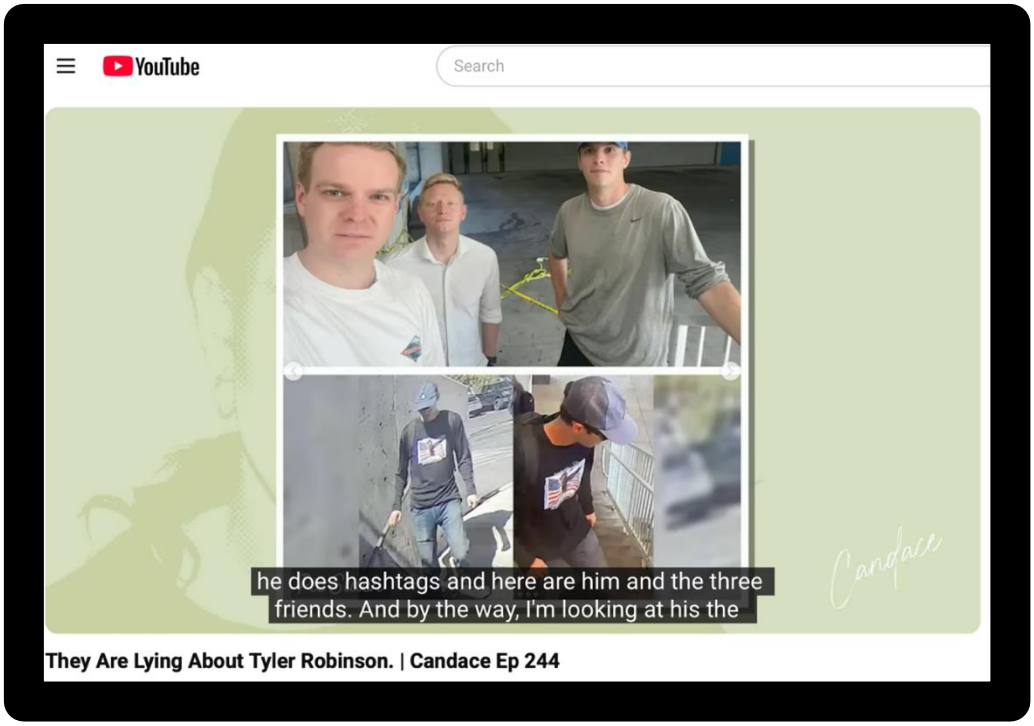
> Don't know how I missed this but then I learned that Phil Lyman himself was very involved in all the communications that immediately went out about the shooting and that his car was in the driveway of the now infamous TMZ footage which showed the ***shooter*** walking twice that day past this house. In fact, Phil Lyman says that he had just pulled into that driveway minutes earlier and had just missed the ***shooter***.

((*Id.* at 28:15-28:45) (emphasis added).

128. Based on further conversations with "Nick," Owens told her audience that she needed to look deeper into Lyman, and, thus, she searched her inbox and found a "tip" about Broderick's Post #1 and Post #2:

> I feel like [Phil Lyman] knows something at the very least. Maybe I'm wrong, but that's how I feel. And I begin actually searching through our tips box for anything related to Phil related to Phil Lyman. Maybe somebody else noticed something or knew something or he said something. And lo and behold, very early on, someone just messaged us and said, "Hey, like you should probably uh ask more questions about Phil Lyman because every time I look into this investigation locally, him and his family members are popping up." And then that person tells me that his nephew had sort of done this public tour, like Phil Lyman's nephew did this public tour saying that he was going to walk the same route that the ***shooter*** walked near his grandmother's house. And that they found, you guys remember this, they found the Converse footprint nearby his grandma's house. And he presented a map, like this is it, this is actually from his Instagram. He presents this map and his nephew's name is Shane[sic].

(*Id.* at 42:37-43:31 (emphasis added).) When making this reference, Defendants displayed the following visual:



129. Broderick never referred to a "shooter" in his Instagram posts—only Owens used that word.

130. In her discussion of Hild in Episodes 244–246, Owens repeatedly gave her audience the impression that she agreed with law enforcement's conclusion that the suspect in black walking to and from campus and through the staircase was indeed the shooter.

131. During this narrative, Owens drew her audience to the attention of Hild:

> ***And by the way, I'm looking at his the friend on the right and I'm like I don't know***. I'd like to know who that is at the very least. And uh I'd like to know who everybody in this photo is. This is just interesting. Like you guys are in the staircase and posting side-by-sides. ***They put these side-by-side photos of them in the staircase and I just was like, I need to just know more about you*** and I need to know more about these two individuals who I couldn't find on his friends list. And they certainly hadn't liked the photo or else I would have messaged them directly to figure out who they are. And yeah, I found I found that very strange.

(*Id*. at 44:03-44:38 (emphasis added).)

132. Owens made the following representations regarding the effort she made to identify Broderick's two friends before publishing Episode 244:

> I reached out to both Phil and I reached out to his nephew Shane[sic] and I asked for them to identify the guys in that photo. Uh, like I said, I was interested uh in who those individuals were because I couldn't find it on his friend list. And in response, Shane immediately takes his profile private. And Lyman, Phil Lyman, leaves me on read. So, I am now left in the predicament where I need to just ask the public.
>
> ***
>
> ***And now I'm getting radio silenced***. So, unfortunately, because I need to figure out what happened on that day, I am turning to the public uh to try to identify those people and anything else that you may know that may help put things together uh for us. Again, please reserve the tips at candaceowens.com for actual tips related to the questions that we are asking.

(*Id.* at 46:30–46:59; 47:28-47:47 (emphasis added).)

133. Upon information and belief, Owens could only have known Broderick's account was switched to private by accessing Instagram. When Instagram profiles are set to private, direct messages can still be viewed. Owens therefore either ignored Broderick's responses or failed to check for his response to her inquiry at all.

134. Owens published statements about Broderick's Post #2 and cast suspicion on Hild and his friends despite having direct access to clarifying information, including Broderick's responses on Instagram offering to speak with and provide the information she sought.

135. Upon information and belief, Owens chose to disregard this readily available information so she could sensationalize the story to increase viewership and generate profit.

136. On September 30, 2025, at 12:01 p.m., C.B. sent an email to Owens' tip line. The email stated:

> Re: I was & am friends with the three boys
>
> ***I was standing in the audience with those boys the day of the shooting at the Charlie Kirk event. I know they have nothing to do with this. They are good Christian people. Truly they have nothing to do with this evil***.
>
> I am the biggest Fan of Candace. Listen to her every day for over half a decade. I love Candace so much.

> I understand Candace will be like "who cares if I ask questions" However alluding an innocent man could've possibly done something horrific when he has nothing to do with any of this is insane. I know "well I'm just asking questions" I support that. But maybe ask the right questions next time. You could ruin innocent lives just by saying something crazy.
>
> ***We were just random locals who loved Charlie Kirk & had to witness something horrific and traumatizing. Now on top of that this is happening. Do more research. This [sic] really unfair to those boys.*** We were innocent attendees. Who had to watch someone we respect and love, get assassin[sic] and then run for our lives not knowing if you would be next.
>
> Please make this right.
>
> Again I am the biggest Candace Owens fan. My dream was to meet her. I listened everything I can get my hands on from her. She's my favorite person. Everyone in my family makes fun of me & friend group bc of how much I LOVE Candace.
>
> I feel so sick. I used to trust Candace with my life. I am truly shocked & scared. Candace was the one person I thought was always telling the truth. ***Now she is using innocent people for a story as if they are a missing puzzle piece. That's just wrong. & completely not true.***
>
> I was with them. We are traumatized by the entire event. This is not helping. ***I want to find out who & why killed Charlie. But through real evidence & truth. Not by gossip & masking[sic] assumptions on a public platform toward innocent families.***

137. Owens never responded to C.B. nor requested to speak with her regarding her personal connection to Hild and Broderick.

138. Owens sent two further text messages to Lyman asking him to identify the two men from Broderick's Post #2. Lyman responded advising that he did not know the individuals.

139. After Defendants published the photo of Hild on Episode 244 of *Candace*, several of Owen's followers began posting in response to her first episode with Hild.

140. "@scascpa4810" commented on YouTube: "Dsnt[sic] the killer always return to the scene of a crime?..."

141. "louisferroni" commented on Spotify: "It looks like those 3 kids went back to the crime scene because the tall lanky one is the Tyler Robinson impersonator- and his DNA and meta

data will show those impressions. So if he revisits - he has a reason why it all matches up."

142. "cnelder3," commented on Spotify: "The nephew's friend in the blue hat is the man in the staircase pics"

143. "Mateo" commented on Spotify:

> I read about 50 comments, not 1 person thinks that dude on the right (in the Gov candidates nephew picture) walking the shooters path clearly looks identical to the guy in the staircase? (Did they really find a Maga Dads Trans loving kid that looks close enough) to frame him? and they all look like they're not sleeping well in those 2 pics… Could she really have just put the real guy out there?! Enough with the Zion bots on Erika already.. They couldn't have been more in love.

144. "Vanessa L" replied to "Mateo's" post on Spotify: "And to go back so soon before all the details have been revealed? Classic way to cover footprints or finger prints found to retrace steps."

G. *Candace* Episode 245.

145. On Tuesday September 30, 2025, Defendants published Episode 245 of *Candace*, entitled, "DEAD OR ALIVE: Who Betrayed Charlie Kirk." As of September 2026, this episode has received over 3.7 million views (more than 3 million on YouTube, 500,000 on Spotify, and 253,000 on Rumble).

146. The thumbnail image for Episode 245 places the Instagram photo of Hild and his friends next to a picture of Israeli Prime Minister Benjamin Netanyahu over the phrase "Pretty Little Liars?" The episode's title, thumbnail, and caption imply that Hild had some role in Kirk's assassination.

147. During Episode 245, Owens again stated that she had been in touch with her "boots on the ground" UVU correspondent, "Nick." Owens further stated that on at least two occasions, she reached out to Lyman to identify Broderick's two friends.

148. Owens began Episode 245 with the following lead in, referring to Post #2:

> ***Also, yesterday we asked for the public's help in identifying two individuals who Phil Lyman's nephew described as his close friends who decided to retrace the path of Charlie's killer***. And what we have discovered thus far is absolutely stunning. ***This story couldn't get any crazier***.

See Episode 245: DEAD OR ALIVE: Who Betrayed Charlie Kirk? CANDACE OWENS, YouTube (Sept. 30, 2025), https://www.youtube.com/watch?v=YA1FxrDWNIo at 0:40-1:00 (emphasis added).

149. In Episode 245, Owens again told her audience that Broderick refused to speak to her:

> But something interesting happened since our episode Shaner completely wiped his LinkedIn page. Doesn't want to know doesn't want us to know who he's connected to. He's also completely wiped his Facebook page entirely. And regarding his Instagram, he's privatized it but he privatized it and then removed all of the photos

> of his investigation into who Charlie Kirk's killer was. Now, that's not that doesn't make any sense to me. I don't understand that. ***I can't make sense of why you would just move to delete everything when I've reached out to you as opposed to speaking to me about where you were, why you shot this video and maybe sending me that video in general. But again, that is now a dead end.***

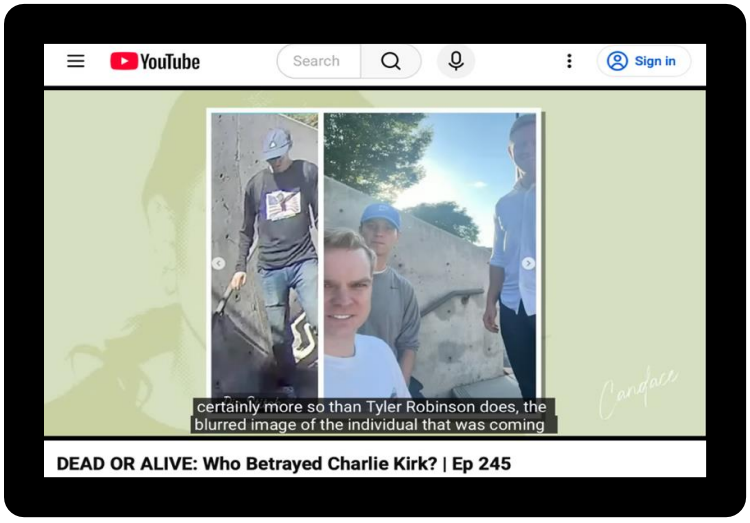
(*Id.* at 7:30–8:11 (emphasis added).)

150. The statement that Broderick moved to delete everything as opposed to speaking with her about where he was is a false statement. Broderick had in fact responded twice to Owens' message with his phone number, agreed to talk to her, and even offered to give her the photographs and video footage from Post #1 and Post #2. Owens never responded to Broderick's direct messages or called him.

151. Owens brought her story back to Hild's identity and again compared him to the FBI photographs released of the suspected shooter in the stairwell:

> Because I got to identify that guy in the blue hat. ***Many of you figured out, by the way, and wrote to the tips box exactly what we were interested about in that person with the blue hat. You noticed the same thing that we noticed. He kind of resembles certainly more so than Tyler Robinson does, the blurred image of the individual that was coming up the stairs.*** I couldn't look away from that. I was going through the photos, and I was going, hmm, ***I would just like to quick quickly identify that individual and check him off and just know where he was because yeah, I looks to be about the same height. It's weird.***

(*Id.* at 8:50–9:26 (emphasis added).) During this monologue, Owens showed this visual:



152. Instead of answering her own questions by contacting Broderick for clarifying information, including the identity of the "guy in the blue hat," Owens again chose to recklessly sensationalize this story at Hild's expense by implying that he could be involved in Kirk's assassination.

153. Despite having received C.B.'s email and Broderick's offer to speak and provide information, Owens also falsely claimed that nobody stepped up to identify Hild/"the man in the blue hat":

> Oddly, this is when I say oddly, I mean this has never happened in the history of all of our investigations, ***no one emailed us to say that they knew either of those two individuals, neither the blonde that's with Shaner or the person that is wearing the blue hat that is with Shaner***. I said, "That's weird." Nobody? Nobody? In the whole wide Candace Owens universe of investigation? It was making me believe maybe those two individuals are like, I don't know, from overseas. Like maybe they're not even American. And it turns out…yeah.

(*Id.* at 9:26-10:02 (emphasis added).)

154. Owens told her audience that one of her fans used technology to search for "the man in the blue hat," which yielded a match to a photograph from an individual from Provo, Utah.

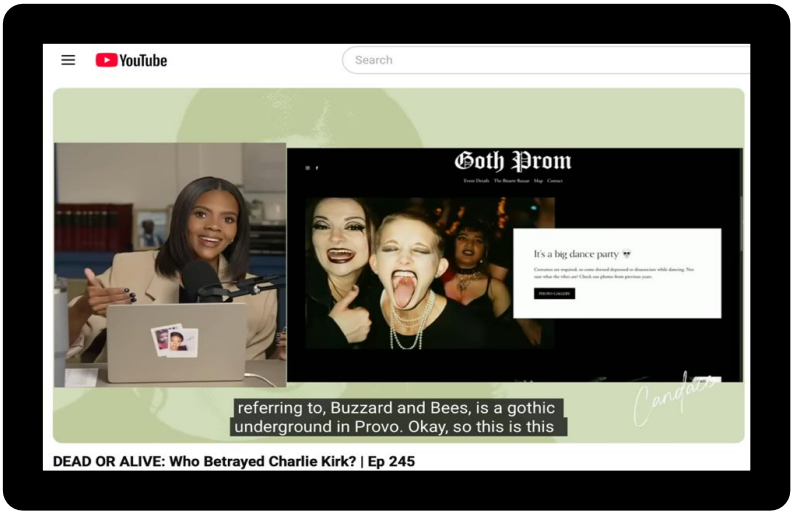
155. Owens then falsely mischaracterized that the photograph was taken at a "gothic underground" event. Specifically, she stated:

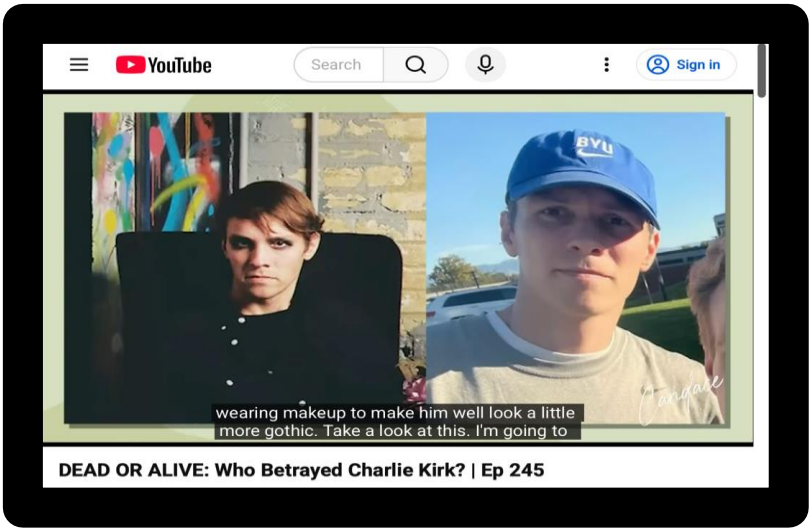
> So I wanted to get to the bottom, as I said earlier, of who that second person was in the photo with his nephew, cousin, whatever you want to call him. And we got just one hit and it was honestly, it was from Belfast, Northern Ireland no less. Somebody sent us an email. And he said, "Look, I conducted an interview an internet-wide search of the person's face and I only got one hit using technology and the hit was in Provo, Utah." And he wrote to me that it was quite a coincidence because not only is the person in Provo for this one hit for this face, but also he's featured on a website pertaining to bees. And he's like, "Didn't you just do a thing saying that you had this weird thing about bees and you thought that there you know, there was something else going on?" And my goodness, you guys, I almost jumped when I learned that that website he was referring to, Buzzard and Bees is a Gothic Underground in Provo, okay? ***So, this is this is the website. It's a Gothic Underground of all things in Provo, the website Buzzard and Bees, and they're speaking about a Gothic prom. That is where that person's face comes up, except he's wearing makeup to make him, well, look a little a little more Gothic. Take a***

> ***look at this. I'm going to show you the side by side of this individual, and I am certain can't say 100%, okay? Because we need to find this person's name, but this is a match, okay? The ears, the chin, just everything about this individual is a match. But, he is as of yet identified as a goth unidentified, pardon, as a Gothic person, and he is also as of yet unidentified as the close friend of Shaner Broderick who cannot be found anywhere else, or people are not familiar with this person. So, I'm thinking maybe he also came from overseas***.

(*Id.* at 18:58-20:52 (emphasis added).) In a previous episode, Owens had stated that a Slavic, communist "underground" that used bee symbols was responsible for Kirk's assassination, so her references here to bees was an attempt to link Hild to that conspiracy theory.

156. Owens displayed the following visuals when referring to Hild as an "unidentified gothic" who was a part of a gothic underground:





157. Later in Episode 245, Owens again referenced the "underground" she previously claimed Hild was associated with as a "communist underground":

> We are fighting a spiritual war against evil. The left and the right must come together to fight authoritarianism. How to do that, by the way? I want to say this to people at home. Take your children out of these schools. All of them. Okay? I cannot stress this enough. Homeschool your children. Make it work, no matter what. Stop sending them to the universities. Okay? ***There is a real underground. It is a communist underground. It is real. It is 100% real. It is not imagined, and what they want, the one resource that these people want, are your children.*** Simple thing that you can do. Okay? I know it takes a lot of adjustment. I'm waking up and I'm homeschooling my kids. Um and but it by the way, it's the most rewarding thing in the world. Also, it just started this week. Uh so, it's only been for 2 days, but it's incredible how happy it makes me knowing that I am I am doing something to buck the trend as we are slipping further into authoritarian rule.

(*Id.* at 44:38–45:32 (emphasis added).)

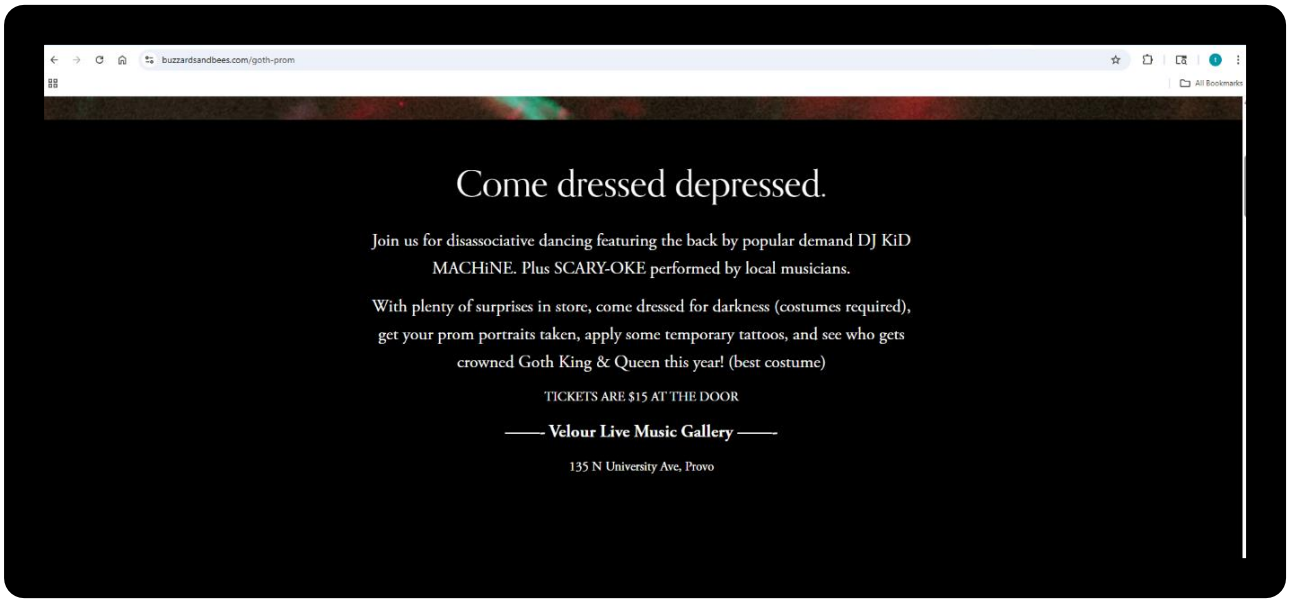
158. Owens concluded Episode 245 by requesting additional tips to aid in identifying "our goth suspect," that is, Hild:

> ***We are still working to identify our goth suspect. It is not the girl who's wearing black, but rather the person that was in the photos with nephew cousin Broderick. Um and we If you know something, please send us tips@candaceowens.com.*** Uh we will have more for you tomorrow.

(*Id*. at 48:42–49:01 (emphasis added).)

159. Any reasonable person viewing the website containing the photograph of Hild Owen displayed would immediately recognize that the photograph was from a Halloween themed "goth prom" costume party hosted at the Velour Live Music Gallery a local venue in Provo, Utah—even advertising an opportunity to get a temporary tattoo at the event. Nothing on the website even remotely supports Owens' assertion that Hild was part of a "goth underground."

160. Specifically, the website describes the event as follows:



Goth Prom, Buzzards & Bees, https://www.buzzardsandbees.com/goth-prom (last visited Sept. 17, 2026).

161. The word "underground" never appears on the website. No reasonable person would associate this venue or party as a "gothic underground." No reasonable person would associate this venue or party as a "communist underground."

162. Hild is not and has never been associated with a gothic underground or communist underground. Hild has no communist or socialist sympathies whatsoever.

163. Owens' mischaracterization of the event as a "gothic underground" and a "communist underground" when the website plainly shows it was a themed costume and dance party demonstrates Owens' refusal to consider readily available facts so she could sensationalize the story to increase viewership and generate profit, at Hild's expense.

164. Owens' mischaracterization of the Halloween costume party was not an innocent mistake or the product of careless research. For weeks prior to publishing the episodes at issue, Owens had been telling her audience that "communist undergrounds" with foreign agents had infiltrated American schools and universities. Owens has stated these "undergrounds" originate from Eastern Europe, are communist, are associated with the Church of Jesus Christ of Latter-day

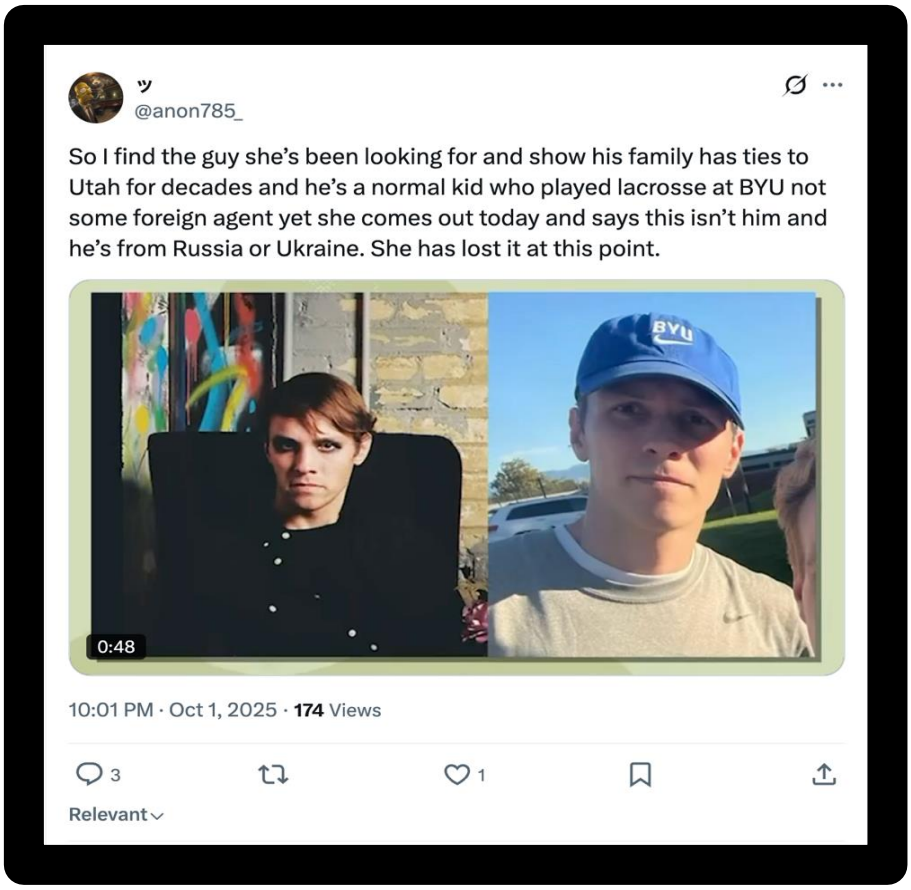
Saints, use the bumble bee as a symbol, infiltrate American schools and universities, create fake identities, are a danger to society, and are associated with the murders of Charlie Kirk and others.

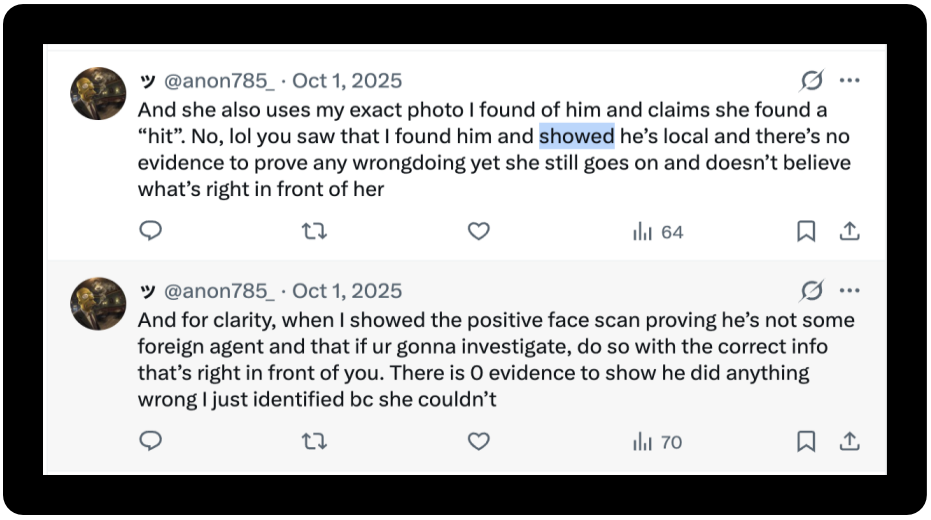
165. By falsely labeling the costume party a "gothic underground" and "communist underground," Owens was neither making an honest mistake nor pursuing the truth; she was manufacturing evidence to validate the preconceived narrative she had already committed to promoting, that gothic, communist "undergrounds" had infiltrated American universities and were involved in the Kirk assassination.

166. Owens' fans nicknamed the "underground" Owens described in this episode "the Mormon bee cult."

167. Upon information and belief, Owens' fan and X follower @anon785_ is the individual who sent Defendants the Halloween lookalike photo of Hild.

168. According to a post and comments made by @anon785_, when he provided the Halloween lookalike photo to Owens, he also provided information that revealed that Hild appeared to be a normal kid from Provo, Utah who played lacrosse and likely was not a "foreign agent." @anon785_'s posts are as follows:





169. Upon information and belief, Defendants knew Hild's identity when they published *Candace* Episode 245, but continued to tease him as an unidentified person, possibly from overseas, to fit their preconceived narrative, generate public interest, and create content for another

episode.

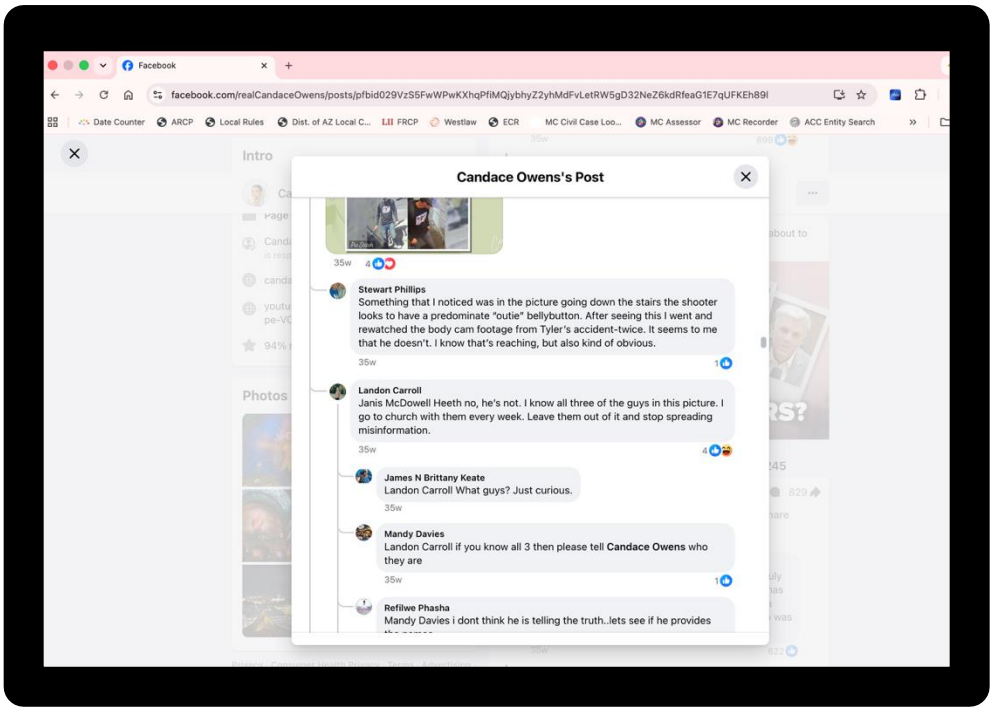
170. Upon information and belief, Defendants' preconceived narrative about communist infiltration of universities supplied a motive for inserting Hild into their storyline. Casting him as a sinister figure served to corroborate the narrative Owens was promoting to her audience.

171. On October 1, 2025, at approximately 11:50 a.m., Hild's friend, Evan Boyer, attempted to clear Hild's name by identifying him and stating the true nature of Hild's involvement by sending an email to tips@candaceowens.com.

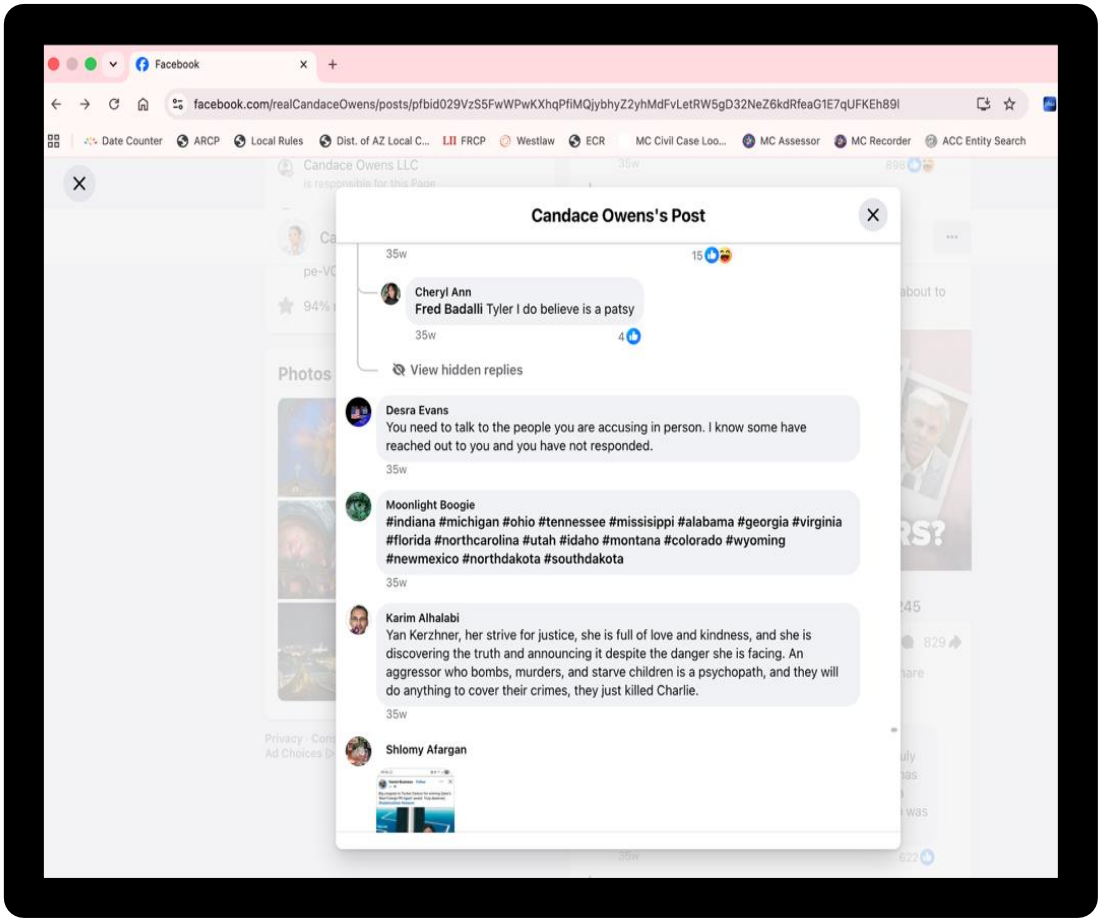
172. Boyer received a return email indicating that the tips inbox was "full" and that his message could not be delivered.

173. Episode 245, like all *Candace* episodes, was posted to the Candace Owens Facebook page. In the comments, at least two individuals posted to the thread indicating that they know Hild and Broderick.

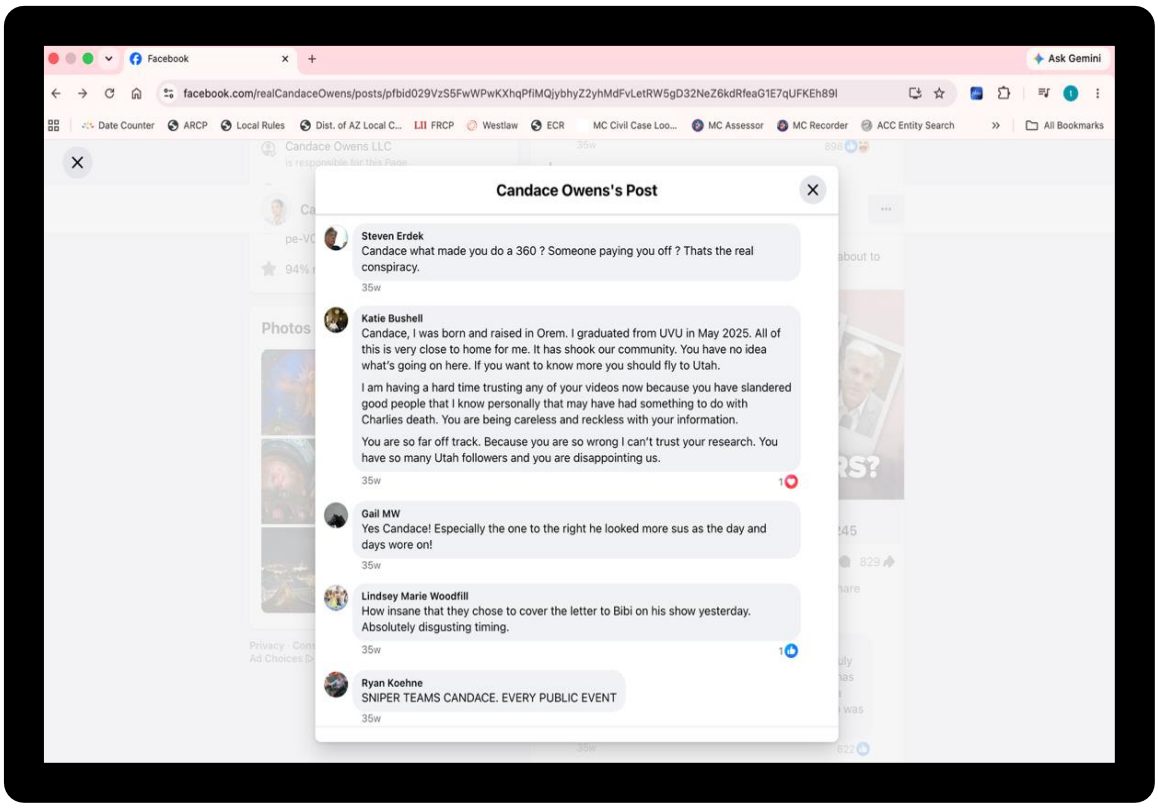
174. Facebook user, Landon Carroll, posted: "I know all three of the guys in this picture. I go to church with them every week. Leave them out of it and stop spreading information."



175. Facebook used, Desra Evans, posted: "you need to talk to the people you are accusing in person. I know some have reached out to you and you have not responded."



176. Facebook user, Katie Bushell, posted: "I am having a hard time trusting any of your videos now because you have slandered good people that I know personally that may have had something to do with Charlie's death. You are being careless and reckless with your information."



177. Defendants' YouTube followers continued to make comparisons between Hild's appearance and the FBI's photographs of the suspected shooter.

178. One follower "OSCORWILD79" posted the following in reference to Hild: "I think he is the assassin."

179. On October 1, 2025, @SueZQily posted on X: "We can't find info on them bc they r foreign"

180. On October 7, 2025, @SnorlaxMom91 posted a link to Episode 245 on X with the comment: "Phil Lyman, his Nephew, with the man in the blue cap plus decoy boy all feel like they could be the 'team' assigned for cover up. Why else would they all be acting so strangely if they aren't heavily involved? Bees, goth club, sounds pretty MK Ultra…" "Decoy boy" is Owens' nickname for George Zinn.

181. "@fight4urHealth1" wrote to Owens on X: "Thank you for all your work to out these evil people behind Charlie's murder."

H. *Candace* Episode 246.

182. On Wednesday October 1, 2025, Owens published Episode 246 of *Candace*, entitled, "Breaking News: A Woman was Seen with Charlie Kirk's Shooter." As of September 2026, this episode has received over 3.6 million views (more than 2.9 million on YouTube, 500,000 on Spotify, and 233,000 on Rumble).

183. Owens wasted no time turning her audience back to her obsession with Hild and Broderick, and provided more misleading information regarding Broderick's contact with her:

> Now, let's jump back into what actually took place on that day. Because I'm starting to get a bit of a stronger hunch about things. We'll jump back in here regarding Shaner Broderick, who is according to Phil Lyman, a cousin who um he refers to Phil as his uncle across interviews. Doesn't matter. They're family members is the main point. And they know each other. ***And Shaner Broderick has of course mysteriously deleted all of his socials except for Instagram, but he's wiped his Instagram. Okay, just deleted his Facebook and just outright deleted his LinkedIn page because I asked him a question before we even went live. That was his response.***

See Episode 246: Breaking News: A Woman was Seen With Charlie Kirk's Shooter, CANDACE OWENS, YouTube (October 1, 2025), https://www.youtube.com/watch?v=adJ4LNGp84I at 7:32-8:14 (emphasis added).

184. Owens' statement that Broderick "mysteriously deleted all of his socials," in response to her inquiry was false and misleading.

185. In reality, Broderick responded to her direct message on Instagram, twice, and affirmatively offered to speak with her and provide the information she requested.

186. Rather than respond to Broderick, Owens ignored his messages and instead (again) portrayed Broderick's conduct as evasive to support her narrative.

187. Even though the suspected shooter was already in custody and authorities publicly stated he acted alone, Owens told her audience that her "investigation" would continue, asserting that the killer remained at large:

> I reached out to Phil Lyman because it's his family and I asked him whether or not he would be willing to track down this footage for me and uh he's not happy with me. He's angry. I mean, he said really not nice things to me. He started asking me if I had something to do with the shooting. Okay. And I basically just stayed focused and said, Phil, okay, we showed your footage, I'm he's very upset about cousin versus nephew thing. It's I It's all irrelevant. ***If you're saying you actually want to help us catch the killer, right?*** If that's really where your heart was, if that's really why you injected yourself so much into this story, why wouldn't you, knowing how deeply I care about this, walk over while you're in the neighborhood popping by, walk over to your aunt, grandma, cousins, I don't care whose house, and say, Hey, you said there was an accomplice, that there was a woman, okay, that might have been an accomplice. Do you mind letting me see the raw footage so that I can hand it over to Candace?

(*Id.* at 14:30-15:29 (emphasis added).)

188. Later in Episode 246, Owens identified Hild by name, and falsely represented to her audience that nobody had come forward saying that they know him personally:

> Okay, now we turn our attention back to the mysterious individual that is uh next to Shaner, right? We discover that one person was from Austria. And then we're going, who's this goth kid that uh Phil has been clear he does not know him. Phil Lyman does not know this individual. Could I help identify him? ***I told you it was unusual that our inbox wasn't instantly flooded with people telling us exactly who it was.*** Well, then we did get another hit on him and a handful of you similarly found the same person that we did. ***A person going by the name Robby Hild who is allegedly from Washington. Now, let me tell you why I don't think this is his true identity. Okay? Because if this was just some kid who grew up in Washington, went to school in Utah, my inbox would be flooded with that name. And it's not. Okay? It's simply not. Oddly, no one has come forward to claim that they know Robby Hild. They're all just saying, "I got a hit. I got a hit. This might be him." No one is saying they went to school with him. This is a young college student. He's allegedly, like I said, from Washington State. And no one personally can say, "I know this person." How could that be? How could that be?***

(*Id.* at 17:32-18:48 (emphasis added).)

189. Owens failed to tell her audience that her "tips" inbox was full.

190. The statement that no one could personally identify Hild was false. C.B. sent a message several days prior indicating she knew Hild. Owens further failed to follow up with Broderick, who would have identified Hild. At least two individuals indicated in the Facebook

post containing Episode 245 that they knew Hild. And Boyer also tried to email Owens, explaining that he knew Hild personally.

191. Owens thus used the false premise that nobody could identify Hild to convey to her audience that Hild is using an alias, that he is not really from Washington State, or and that he did not really attend school in Utah, all to further her narrative that he is a malicious foreign agent.

192. At the time of these statements Owens had access to copious amounts of evidence proving that these statements were not true.

193. The X account @anon785_ (formerly @jdizzle785), who originally emailed Hild's name and photo to Owens, informed her that he had a packet of evidence proving his identity, family ties, and background. Owens ignored him.

194. On October 1, 2025, @anon785_ published Hild's identity on X. In the roughly 14 hours between the post and the publication of this episode, Owens' fans began searching the internet for more readily available information on Hild. Many published their findings across social media and sent their information to Owens. The information they found about Hild online included: his college lacrosse profile; dormant Facebook accounts; a patent issued in 2021 with Sammamish listed as his town of residence; property records for family members in Washington

and Utah; his sister's wedding announcement listing Sammamish as her hometown; his family members' and friends' social media pages; and more.

195. Immediately after identifying Hild by name and falsely reporting she believed he was using an alias, Owens maliciously told her audience she had "stronger than a theory and more of a hunch" that he could be associated with the Azov Battalion, a formation of the National Guard of Ukraine with historic neo-Nazi ties. She did so even though Hild grew up in Washington and attended college in Provo, Utah, and without any factual basis connecting him to such groups. Her only purported support was the false representation that no members of her audience had come forward saying they personally knew him. Owens further suggested that the Azov Battalion had infiltrated American universities as sleeper-cell agents:

> ***No one is saying they went to school with him. This is a young college student. He's allegedly, like I said, from Washington State. And no one personally can say, "I know this person." How could that be? How could that be?***
>
> I'm going to tell you something. ***I'm starting to get a hunch about things and uh we're going to go more deeply into this tomorrow, but many of you guys have been sending those clues about the Azov Battalion, about um Ukrainian, Russian uh people that were coming into Utah. There seems to be some organized movement, people that are being given new identities.*** Actually, one person uh wrote to us and told us that UVU in and of itself as a campus uh has an unbelievable amount of dedication. I mean, even the president, I'm blanking on her name, it like majored in Soviet studies. ***Like, they have a direct pipeline from Russia to America.*** It's very interesting. And yes, it is true. It is a fact that Tyler Robinson, we can't confirm that this is Mike Mitchell, but there are old photos of Tyler Robinson when he's a lot younger visiting his uncle Mikey. Okay, his uncle Mikey who is working with the Ukrainian Azov Battalion. Okay, he's a military man. And that gets really interesting when I start to combine all of the aspects of this case. And again, we are still in theory territory, but I feel like we are in strong **I*'m starting to get a stronger than a theory and more of a hunch that this was a military operation and people that executed this are actually from overseas.*** And when you look at the aspects of the UVU case and their strong ties to that region, things get really interesting when you look at UVU campus and their strong ties um to the CIA, things start to get really interesting, right? ***And I think this is a path that needs to be pursued that these people have different identities and that they are perhaps all from overseas***. And it turns out that there have been the New York Times has reported on uh Russian Ukrainian spies that are building new lives from themselves with new IDs uh in America, in Brazil. ***Essentially what we're talking***

> ***about are terrorist cells.*** I believe that.
>
> I believe that with the Ukrainian war, okay, and they always hack us emotionally. Oh, we need to have open borders. It allows them to get in people that are perhaps completely insane and deranged and they are in fact uh raising little militants and they're executing these programs. And let me tell you, if this is correct, if this is sort of like ***a neo bolshevik militant tribe***, then we need to be concerned. And spiritually, **I can tell you how I feel spiritually. That feels right to me.** I've been pleading with you guys to get your kids out of these schools. I am telling you that something very dark is going on. And I'm going to continue to stress to you that you need to take your children out of school. Homeschool your children. I there is there is something dark that I am perceiving that is happening not just in public schools but in private schools as well. Okay. Why our kids had to go. ***We we couldn't get basic answers about somebody that had kind of fallen into the through the cracks and was posting Polish underground symbols.*** Her her parent was posting uh Polish underground symbols and I realized something was wrong. Something was off. I'm showing you this just this is like one headline and this is translated from Russia. uh Russian by the way. So the the English here isn't perfect, but um it is telling about about white lotus sect of all things. For those of you that followed uh the becoming Brigitte series and things that we have spoken about about this white lotus idea***, it's essentially they're training fighters and that this has been uh declassified and that they have these regional organizations uh these all Ukrainian organizations and that exactly what it sounds like that they're training uh fighters that it's really dangerous and my suspicion is that this is happening right here in America.*** it would make sense that there is global communication if they want to take somebody out. And it is also a fact, by the way, that Charlie was on a um a hit list. I also was on that hit list. Tucker was on the hit list. And actually, I forgot the name of the individual that worked for Alex Jones who got killed, but he was similarly on a Ukrainian hit list. It's something that I think should be explored a little bit further. And like I said, we're going to go deeper on that topic on um we'll actually do that tomorrow and we'll bring in the aspects and show you whether or not, you know, Uncle Mikey could be Mike Mitchell, could he be the detective? ***But I'm just seeing these recurring themes of the military for whatever reason. And I'm also seeing a reoccurring theme of child abuse uh and a recurring theme of people who appear to have changed their name and that are operating in the shadows and something is not right. Again, a theory that is now turning into a very strong hunch.*** More on that tomorrow.

(*Id.* at 18:48-20:54 (emphasis added).)

196. Hild is an American citizen with no ties to the Azov Battalion, Russia or Ukraine, or any terrorist cell.

197. On information and belief, Mike Mitchell, the retired police officer and friend of the Robinson family who helped turn in Tyler Robinson, is not working with the Azov Battalion

either.

198. As a direct and foreseeable result of Owens' statements in the podcast episode, viewers and listeners were led to believe that Hild was involved in Kirk's assassination. Subsequently, several members of Owens' audience disseminated this false narrative on social media, publicly accusing Hild of involvement in Kirk's assassination.

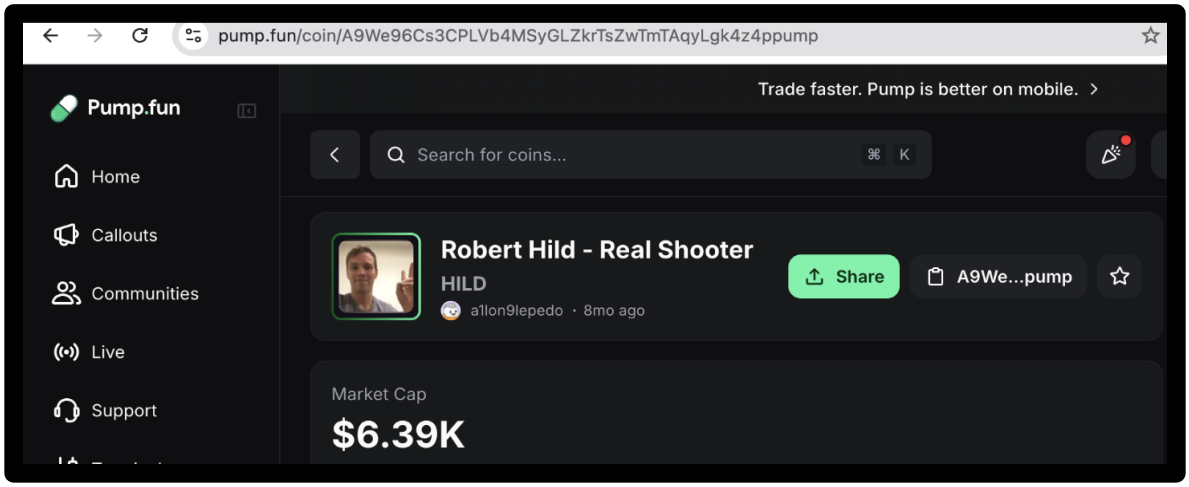
199. On October 1, 2025, X user @pani_kundi posted: "Robby Hild and the Broderick/Lyman family are involved with criminal acts related to the assassination of Charlie Kirk."

200. On October 1, 2025, X user @Venimus_Vidimus posted: "I guess he's a professional assassin, neither trans nor goth. He infiltrated and used them. With no trace of him, we can presume he's an Israeli asset."

201. On October 1, 2025, X user @JosieLewis2019 posted: "Goth dude is stairwell suspect dude. No question…."

202. On October 1, 2025, X user @PISSrael666 posted: "Ca [sic] of the real shooter named Robert Hild."

203. On October 1, 2025, individual(s) even began placing bets on the prediction market website "Pump.fun" that Robert Hild is the "[r]eal shooter of Charlie Kirk."



See https://pump.fun/coin/A9We96Cs3CPLVb4MSyGLZkrTsZwTmTAqyLgk4z4ppump (last visited Sept. 17, 2026).

204. On the same day that Defendants published Episode 246, Owens sent several text messages to Lyman asking him if he is Ukrainian:

> Also is 'Lyman' Ukrainian, originally.
> ….
> Is your last name Lyman originally Ukrainian? Like the oblast? I don't want to speculate. You can just tell me.
> ….
> I know you guys settled Blanding. I am asking however if the surname is Ukrainian.

205. This is just another example of Defendants grasping for evidence to fit their preconceived narrative.

I. *Candace* Episode 247.

206. On Thursday October 2, 2025, Defendants published Episode 247 of *Candace*, entitled, "INSANITY! Guess Who Kash Patel Sent to Investigate Charlie Kirk's Assassination." As of September 2026, this episode has received over 3.8 million views (more than 3 million on YouTube, 600,000 on Spotify, and 224,000 on Rumble).

207. In Episode 247, Owens told her audience about all the "tips" she has now received about Hild:

> ***Uh Robby Hild. We've put a TBD on because we're getting crazy information on him.*** We're calling him Mr. Worldwide over here. Okay. We've got Robby Hild and the Cayman Islands. We've got Robby Hild in Spain. We've got Robby Hild all over. All over. And so that's going to take some time. We need to be more thorough in that. ***And uh we will have more on Robby Hild on Monday.***

See Episode 247: INSANITY! Guess Who Kash Patel Sent to Investigate Charlie Kirk's Assassination, CANDACE, YouTube (October 2, 2025), https://www.youtube.com/watch?v=t1YtLS1n8Vs, at 24:35-24:58) (emphasis added).

208. Ten minutes later into Episode 247, Owens continued her narrative about "sleeper

cells" in American universities:

> Take your kids out of school. These sleeper cells are all across the nation. Okay? And we're going to get into this next week. I wanted to make sure that I could get more thorough and show to you the Ukrainian connections that are coming across in this that are very strange, but I guess not so strange when you pay attention to the last shootings, trans shootings that have happened.
>
> uh the Catholic school shooting for no the person was scribbling in their notebook recently the shooter in Cerrillic. What's that about? What's that about? Why why why do we suddenly have Russian speakers uh that are involved in these sorts of things? We are looking at a program and we're going to speak more about that because **you *have to understand it is dangerous what is happening right now. It's a dangerous game and we are playing with dangerous people*** and if it ever needed to be said I am certainly not suicidal. I'm angry. I'm angry at people that are homicidal is really what's happening. And enough is enough. And if we are not brave enough to speak out, if we are not brave enough to take that action and to begin something as minor as homeschooling our kids, getting out of their system entirely, uh then our children are going to inherit a world in which the truly evil people have completely wrapped everything, right? They have wrapped everything and they control everything. It's up to us, guys.

(*Id.* at 37:55–39:08.)

209. Moments later, Owens asks her audience to send in more "tips" on Hild:

> I should have first let you know we did open another tips line uh because we need to we're just we are at max capacity. ***I want to remind you guys if you have tips pertaining to Robby Hild anything that we are saying about what took place in Orem on that day.***

(*Id.* at 39:16–39:30 (emphasis added).)

210. Hild has never been to the Cayman Islands and has no ties there.

211. Owens' accusations regarding Hild's supposed foreign ties were not the product of any credible investigation or evidence, but rather a continuation of the fabricated narrative Defendants had been constructing for Owens' audience.

212. On October 2, 2025, X user @projectconstitution posted: "If anyone has information on Rob Hild Jr. or knows him personally, please reach out to me….The public deserves the truth. The wrong man may be sitting in custody while the real shooter walks free."

213. On October 3, 2025, X user @WildRhino29 posted: "Robbie Hild was the aware patsy, knowing Tyler would be framed, and did this thing. Meanwhile a pro hit team takes out CK."

214. On October 5, 2025, a now deactivated X user (@Christi35509400) posted: "The guy in the jeans faking the mauser walk is Rob Hild. Why has the FBI shown 1 video. 3 low quality pics, where're there's 100s of cameras. FBI showed a fake gun…."

215. On October 5, 2025 one of Owens' followers wrote a blog post on the blog "Call Me Stormy" stating:

> Rob Hild, the former Brigham Young University lacrosse club goalie, has played a central role in the assassination charade as a character winding to the top of the Losee Center at Utah Valley University in Orem. Initially it was believed this character was Tyler Robinson, the individual who the FBI arrested and charged with the assassination of Charlie Kirk.
> But as the days have progressed, the focus has shifted, and many individuals now believe it was Hild going to the rooftop. He's also been pictured masquerading as a Goth. Initial speculation was that he might be a German or Austrian emigrant…

J. <u>Hild's Roommate Attempts to Clear Hild's Name.</u>

216. One of Hild's other roommates (the "Roommate") contacted Owens and the owner of the X account @ProjectConstitu in an effort to correct the misinformation that had been circulating around the internet since *Candace* Episode 244 suggesting that Hild was the individual depicted in the stairwell photographs circulated by the FBI in connection with Kirk's assassination.

217. On or about October 2, 2025, the Roommate sent @ProjectConstitu the video that C.B. took that shows Hild and Broderick in the crowd at the Event at 11:52 a.m., confirming he was in the crowd the same time the suspected shooter was in the stairwell.

218. After reviewing the video and its metadata, @ProjectConstitu published a post at 12:44 p.m., about four hours prior to Episode 247's release. The post included the video and metadata and issued a formal apology to Hild. This publicly debunked Owens' narrative.

219. Several individuals, including the individual behind the @ProjectConstitu account, tagged Owens in the post to inform her that Hild was not connected to Kirk's assassination.

220. That same day, later in the evening, Roommate spoke to Owens on the phone. Owens was already aware when this phone call took place that Hild was in the crowd when Kirk was assassinated.

221. Roommate asked Owens if she had seen the earlier post from @ProjectConstitu. Owens initially pretended that she had not seen the post containing Hild's alibi and then eventually admitted that she had.

222. During the phone call, Roommate provided an alibi for Hild for the entirety of the day on September 10, 2025. He informed Owens that he was with Hild in the morning before the Event, that there were photographs and a video of Hild at the Event and at Grandma's House immediately after the Event, and that he was with Hild on the evening of the Event. Hild's whereabouts were thus accounted for the entirety of the day of the shooting either by photographic, video, or eyewitness accounts.

223. Owens told Roommate that Hild's attendance at the Event did not "clear" him as the individual depicted in the stairwell photographs because, according to her, "we do not have a timeframe for [the stairwell photograph]." But Owens knew the Indictment contained information that the approximate time the footage of the suspected shooter in the stairwell was captured was around 11:52 a.m., and she even created her own timeline with the that timestamp. Owens also knew from the TMZ footage that the suspected shooter was walking past Grandma's House at approximately 11:49 a.m.

224. After Owens' narrative was publicly debunked via photographic, video, and eyewitness accounts, she decided to change narratives—claiming she never believed statements that she clearly made—to keep Hild as a viable suspect for her conspiracy theory.

225. Owens told Roommate that she "has never been operating under the assumption that Robby is the shooter" and that "I don't think the person walking up the stairs is the shooter." These statements clearly contradict her repeated statements on her podcast that the suspect in black walking to and from campus and through the staircase was indeed the shooter.

226. Despite initially admitting, "I have no idea if that's Robby [in the FBI staircase photo]," Owens changed her narrative, stating that she does "believe he was walking up the staircase."

227. Owens had never told her audience her apparent belief that Hild was not the shooter and had instead given her audience the opposite impression in multiple episodes of *Candace*. Nor had Owens told her audience that she did not believe the individual in the FBI's stairwell photograph was the shooter, instead, repeatedly saying the opposite.

228. Owens told Roommate that she had attempted to contact Broderick before her show (Episode 244), but that he chose to hide and not respond to her questions. That statement was false.

229. During the call, Owens also revealed that her only "evidence" against Hild was his association with the Lyman family and that Hild's build matched the individual in the stairwell photo.

230. Owens told Roommate, when referencing Hild, "so, unfortunately, you are who your friends are."

231. Despite Owens' earlier assertion that she could not "clear" Hild without confirming the timestamp of the stairwell photograph, Owens offered to explain to her audience that there was a "mix-up" and say that she would say "I am really sorry" if she could speak to Hild directly and obtain video footage from Broderick. Owens told Roommate, "that's it, that's the only way out of this."

232. Upon information and belief, the video footage Owens was demanding was the

TMZ footage from Broderick's grandmother's neighbor across the street neighbor. This video footage has nothing to do with Hild, so there is no reasonable relationship between her offer to exonerate Hild and the video footage she was demanding.

233. Demanding exclusive information in exchange for "clearing" the names of individuals identified on the podcast is a tactic commonly used by Defendants.

234. Owens had already attacked Lyman for not providing the alleged video footage of the shooter with a woman that Lyman unequivocally stated he did not possess.

235. Owens' offer to clear Hild's name contingent not on exculpatory evidence, but on receipt of content that could drive viewership demonstrates she did not believe her own theory about Hild's involvement in Kirk's assassination as Owens was willing to abandon her focus on Hild and admit his innocence in exchange for exclusive footage she could monetize. As the following allegations make clear, Owens continued targeting Hild by falsely linking him to Kirk's assassination despite knowledge of Hild's alibi.

236. The following day, on October 3, 2025, Lyman texted Owens and asked if she would be issuing an apology to Hild. Owens responded: "Apology for Rob Hild? Lol. I spoke to his roommate yesterday. He clarified nothing. I am still looking into him."

K. *Candace* Episode 249.

237. On Tuesday October 7, 2025, Defendants published Episode 249 of *Candace*, entitled, "TPUSA RESPONDS: Yes, the Text Messages Are Real." As of September 2026, this episode has received over 3.7 million views (more than 3 million on YouTube, 500,000 on Spotify, and 217,000 on Rumble).

238. In Episode 249, Owens revealed to her audience the new narrative that she invented during the phone call with Roommate after Hild's alibi refuted her previous narrative.

239. Owens told her audience that there are four decoys tied to Kirk's assassination, but

none of them are the shooter—another significant narrative pivot:

> Uh, but I want to tell you that I maintain I actually believe that this was a military hit that involved foreign actors and also literal actors. I believe that that day ran uh something akin to JFK's assassination. I believe that there were therefore multiple decoys on the ground. ***I do not believe, just so I'm clear here, that the person who was walking up the stairs killed Charlie. In fact, my suspicion is that that photo was not even shot on the same day***. I do not believe that the person who ran across Losee rooftop killed Charlie. I think it was another decoy. I do not believe that shot came from a Losee Center at all. And I obviously, we all know that decoy George Zin didn't kill Charlie. And I received an interesting tip about him as well that he's much more connected than what meets the surface. He potentially has connections to the federal department, familial connections to the federal department. And we are prodding that. ***It's getting interesting. Anyway, uh that would suggest that there are thus for a total of four decoys like George Zinn, staircase guy, maroon shirt guy, and Losee center guy.*** None of which I believe actually pulled the trigger. Call it a hunch.

See Episode 249: TPUSA RESPONDS: Yes, The Text Messages are Real, CANDACE, YouTube (October 7, 2025), https://www.youtube.com/watch?v=5autG89PW6w, at 35:05–36:27 (emphasis added).

240. After receiving exculpatory information from Roommate about Hild, Owens, for the first time, told her audience that she did not believe the stairwell photograph was taken on the same day as the shooting.

241. Owens made this statement even though the Indictment and other official sources known to Owens established that the stairwell photographs were taken on the morning of Kirk's assassination around 11:51 a.m.

242. Owens' shifting position and disregard for known facts further demonstrates her willingness to alter her narrative to continue to sensationalize the story at Hild's expense.

243. Following Episode 249, Defendants' audience continued to post about Hild.

244. On October 21, 2025, X user @JosieLewiss2019 posted:

> Phil himself is acting really fishy and hostile any inquiries about that day. Could it be that Rob Hild was retracing the steps to get GPS data that fits the narrative for someone?...The stairwell guys turns out to be Rob Hild who "retraced" Tyler's path

> with Phil Lyman's nephew. When when[sic] asked about it, he mysteriously deleted his Instagram post for no reason. As if they had something to do with the murder. Extremely fishy. Why act guilty over retracing?

245. On October 30, 2025, X user @Harkjytte posted: "the guy on the stairs is Hild."

246. On November 1, 2025 X user @nirnegli posted:

> my #SusSearches data show Egypt, Israel, Saudi, & Huntsville AL are searching #SusTrio Robby Hild, Shaner Broderick, & Gernot Omer from 8/17 to 8/24 too; they got sloppy as "showtime" approached & they VPNed less re the small-time players; the never counted on @RealCandaceO outing them….

247. On December 31, 2025, X user @cmertin38383 posted: "The guy on the roof was not Tyler Robinson it was Robbie Hild."

248. On January 16, 2026, X user @WildKathyAZ posted in response to the stairwell photo: "This is Robbie Hild, not Tyler. Free Tyler!"

249. On or about November 6, 2025, *Candace* became the number one podcast in the world, an accolade Owens boasted about on her *Candace* episode that same day.

250. On the same day, emboldened by this accomplishment, Owens threatened in a publication to her broad audience "[a]nything that gets sent to me by a lawyer is getting publicized. That's it."

251. On or about December 17, 2025, Owens appeared as a guest on *Piers Morgan Uncensored* to discuss her "investigation" into Kirk's assassination.

252. During her interview with Morgan, Owens stated that in her investigations, she does not mention people by name unless she has "concrete evidence." Owens further stated: "the people that I have named thus far are people that I believe are engaged in a cover up." Finally, Owens stated: "Now, if I'm going to make an assertion that somebody has something to do with planning this murder, I better be damn sure."

L. *Candace* Episode 318.

253. On Monday March 30, 2026, Owens published *Candace* Episode 318, entitled, "The 33 Club: Freemason Murder Plot EXPOSED!" As of October 2026, this episode has received over 2.8 million views (more than 1.8 million on YouTube, more than 300,000 on Spotify, and more than 216,000 on Rumble).

254. The thrust of Episode 318 was that Freemasons (whom Owens calls "the 33s") were behind Kirk's assassination, acting in concert with the federal government and the French.

255. In the pertinent portion of this episode, Owens repeated her previous claim that Tyler Robinson was not the assassin, claiming there was an "overwhelming amount of evidence that the feds set this kid up as a patsy."

256. Owens then told her audience that the individual in the staircase security footage resembled Hild, and not Robinson, and went on to imply that Hild was part of a group of people who were "guilty" and "working together" to cover up the truth around Kirk's assassination:

> **He [Matthew Robinson] does not believe that the person looks like his son that is coming up to… coming up the staircase. By the way, we the public agree with that. It's not like his dad's got special eyes. The picture looks nothing like Tyler Robinson coming up the staircase.** ***It looks actually a lot more like Robby Hild coming up the staircase and… and he recognized him on this.***
> Where did we hear all of this from? Who told us this? Who came up with all of these narratives that are in the press? The feds! The same people—the SWAT team, local police—are all saying the feds are behind this.
> Kash Patel, delayed. "We got 'em, we got 'em. It was the [Zachariah] Qureshi person. We got him! We got him!" Making people stop looking. sending everybody on wild goose hunts. Kash Patel is central in delaying everything that happened on that day.
> You have now Joe Kent telling you that he stopped him from investigating things internationally. For what reason? Why is Turning Point not outraged about that? Why are they instead upset with
> Joe Kent? **Why are they not angry at Kash Patel? Why are they hosting Kash Patel on the Charlie Kirk show and angry at Joe Kent? Do I live in an upside down world or are all of these people guilty? I'm going to go with the latter.** ***All of these people are guilty and working together is what it seems to be to me and the much more rational public.*** I get it. 33s [Freemasons] got a lot of money, so you're going to get the stupid influencers out there trying to make you subscribe

to idiocracy.

See Episode 318: The 33 Club: Freemason Murder Plot EXPOSED!, CANDACE, YouTube (Mar. 30, 2026) https://www.youtube.com/watch?v=7ERqbYElOfs, at 38:12–38:38.

257. Owens' implications that Hild was involved in Kirk's assassination; that Robinson's father recognized Hild in the staircase photo (which is impossible, as they have never met); and that Hild was working with members of the federal government regarding Kirk's assassination and was thus "guilty" are all completely false. When Owens published this episode, she already was aware that Hild could not possibly have been the individual in the staircase photo.

258. Shortly after Defendants released Episode 318, @ProjectConstitu posted a lengthy summary of the episode on X. The reply to this X post authored by @BuddyGoingAWalk makes clear that Owens' audience understood her implication that Hild was involved in Kirk's assassination: "Robbie Hill [sic] wasn't looked into far enough. As soon as Lyman gave an alabi [sic] or reason everyone moved on. This person needs a deep dive, especially since it's been shown how this group, including Robbie was seen copying [sic] up to George Zinn[.]"

M. *Candace* Episode 320.

259. On Wednesday April 1, 2026, Owens published *Candace* Episode 320, entitled, "Friends in High Temples: Charlie's Final Call With Bibi." As of September 2026, this episode has received over 2.2 million views (more than 1.6 million on YouTube, 400,000 on Spotify, and 202,000 on Rumble).

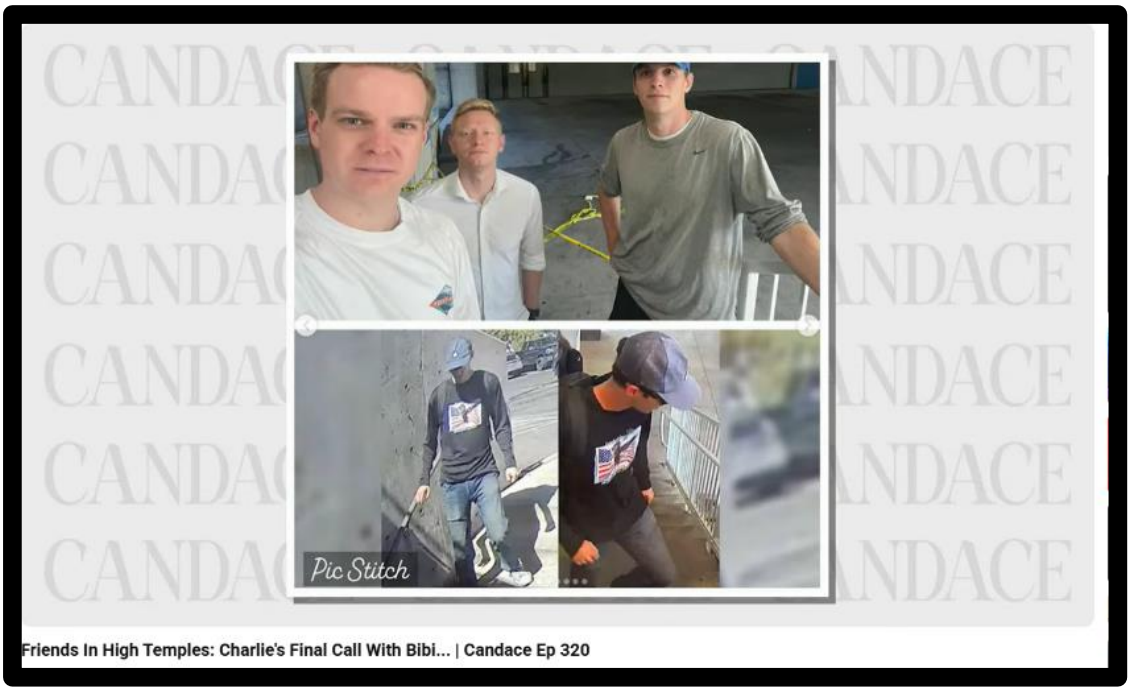
260. The thumbnail for Candace Episode 320, features the "staircase guy" photograph, whom Owens convinced her audience is Hild:

261. During *Candace* Episode 320, Owens expressly mentioned Hild in association with the "staircase guy" photograph:

> Now, there is one more person who is uh tied to the Romney clan who also went to BYU and we brought him up very early in the investigation. I was it was one of the first people that I put an APB out for because he was bizarrely standing alongside Shane Lyman. Remember, we learned like Phil Lyman's whole family owned that block. You know, the cameras of people walking, they were all tied to Caldera Engineering walking down the block. I don't even think that's Tyler Robinson. Looks to me much more like Lance. And Phil Lyman's nephew and or cousin, Phil Lyman says it's a cousin. Uh Shaner says he's a nephew, **but he and some friends uniquely traced the steps of the killer** and showed people, This is the footprint. This is look, he was here. This was on our property that this happened. Let's see those Instagram posts to jog your memory. *You remember Robby Hild. Um and I thought* ***I said he's got way he looks the guy all the way to the right there looks way more to me like the build of the person coming up the stairs*****.** That was the episode that we did.
>
> Who are these people? We asked. Why is Robby Hild Why are they posting like they have exclusive access? What are the chances that this happened? Look, the footprint. ***That footprint is mentioned in the document yesterday. The footprint. It wouldn't be hard to make a footprint. You just take someone's shoe and do that.***

See Episode 320: Friends in High Temples: Charlie Final Call with Bibi…, CANDACE, YouTube (April 1, 2026), https://www.youtube.com/watch?v=rupRLXmSndU, at 28:13–29:18.

262. During these comments, Owens displayed the following graphic:



263. Despite her change of narrative in Episode 249 regarding Hild, Owens pivoted back to concurring with law enforcement that the suspect in black in the staircase was "the killer."

264. The "document" Owens referenced is Robinson's Motion to Continue Preliminary Hearing. She thus baselessly informed her audience that a photo of a footprint from Post #2 in the backyard of Grandma's House was part of the evidence in the prosecution's case against Robinson.

265. Owens' suggestion that it "wouldn't be hard to make a footprint" therefore suggested that Tyler Robinson was a patsy and that Hild helped frame him for murder by fabricating evidence.

266. During Episode 320, Owens announced that her investigation into Hild was officially reopened:

> Anyways, like I said early on, I put on that APB. ***I put out that APB for Robby Hild*** because we couldn't find his name at the time and then we did. ***And I learned from viewers at home that his family is allegedly married into the Romney family.*** **Okay?** Now, I cannot find a document where I put this together and put in all of the information of how Robby Hild was married into the Romney family. I know

> across social media, they were involved with the campaign. I need to now reestablish that connection. So I will again, because it seems I accidentally deleted that email. ***If you know how the Hild family is related to the Romney family, please email us at more tips at candaceowens.com. Cuz that would be a stunning connection. Like I said, my memory serves me correctly that there was a connection between these two families that was established early on that I thought nothing of and now it matters.*** But what we know for certain is like I said, Robby, he also went to BYU. And he played lacrosse. He appears to have graduated around 2020 and I will leave it at that, ***but the investigation into Robby Hild is now opened again***.
> ****
> ***Um they know Tyler Robinson didn't do it.*** Now, speaking of the last name Robinson, I should mention that Robinson is also a last name and that's why we will be taking a week off next week is a last name that the Romney family is married into. Doesn't necessarily mean there is a tie. It's just interesting. ***Certainly, the Hild family is married into the Robinsons as well and so we need to become pretty much genealogists and trace everything and all of the connections.***

(*Id*. at 29:35–30:42, 34:18-34:46 (emphasis added).)

267. To fabricate a relationship between Tyler Robinson and Hild, Owens thus told her audience that Hild and Robinson were relatives. In reality, Hild is not a relative of Robinson, nor has he ever met him.

268. In response to correspondence from Hild's counsel, Owens offered to correct her false claim that Hild and Robinson are relatives, though she never did.

269. The online posts from Defendants' followers continued after Owens declared that the investigation into Hild was "opened again."

270. @cmartin38383 posted on X: "Robbie Hild looks just like the alledged shooter how interesting especially when you find out his family is connected to the Robinson family.... coincidences are staking up like crazy around y'all it's amazing!!!"

271. X user @Dixiebitsy posted: "Candace showed pictures of a foreign guy in her show a while back asking for help identifying him. She showed his picture again not too long ago. He matches this guy, the shoulders are identical."

272. Another follower of Owens on X, @dangerousconspr, posted a list of individuals

who allegedly "[g]ave the order & prepped the operation" for Kirk's assassination, and the list included Hild. In another X post, the same individual commented on the FBI photo of the suspect in the stairwell, "Agreed. Or Robby Hild Mr. Hit-squad."

273. On YouTube, @KwaniiCultureConvos commented: "Did the defense bring up the foot print doee it match Tylers wouldnt that be easy to prove and if they have video of him or when they booked him he had shies on. Point beingi wonder have they looked inri it."

274. On March 22, 2026, X user @FlerfHerder posted: "Its pretty coincidental that [Phil Lyman] arrived at your aunt's house right before the suspect is filmed, then you all left shortly after…Then later your nephew Shaner and Rob Hild go retrace the suspects path. Like they knew it already."

K. <u>Impact to Hild.</u>

275. After Defendants falsely linked Hild to Kirk's assassination to an audience of millions, Hild's life has not been the same.

276. Defendants' fans and followers have been known to include violent individuals, and Owens herself has been suspended from YouTube on at least 2 occasions for hate speech.

277. In his manifesto, Brenton Tarrant, the gunman in the 2019 Christchurch, New Zealand mass shooting, wrote that Owens had influenced him above all others: "The person that has influenced me above all was Candace Owens. Each time she spoke I was stunned by her insights and her own views helped me push further and further into a belief of violence over meekness." When Owens heard she was referenced in Tarrant's manifesto, she responded, "LOL."

278. In his manifesto, Solomon Henderson, the gunman in the January 2025 Nashville Antioch High School shooting, wrote: "Candace Owens influenced me above all each time she spoke."

279. In October 2025, Australian authorities denied Owens a visa citing concerns that

her presence in the country could "stir up or encourage dissension or strife," lead to "increased hostility and violent or radical action," and concluded she failed the Migration Act "character test."

280. Multiple individuals have publicly called for violence against Hild in comment sections and in standalone social media posts, including statements advocating that he be killed.

281. Upon information and belief, several of the individuals who posted death threats subscribe to Defendants' podcasts or listened to episodes in which Owens mentioned Hild.

282. For the first 5–6 weeks after Owens identified Hild by name in association with Kirk's assassination, Hild hid out of fear that he would be recognized and harmed by members of Owens' audience. Hild even applied for refugee status in another country. Hild left the State of Utah for several months out of fear for his life and safety.

283. In response to Defendants' call to action for tips, Owens' fans/followers posted the personal information of Hild and Hild's family members on social media, including exposing their names and home addresses. Owens' fans/followers also attacked Hild's previous employers in online posts.

284. Law enforcement recommended that Hild and his roommates not stay at their homes.

285. One individual attempted to stalk Hild in person and documented his efforts to expose Hild's location on social media.

286. Hild's home and vehicle were vandalized.

287. Multiple individuals attempted to hack into Hild's dormant Facebook account.

288. Hild has dated his girlfriend for almost two years, beginning before the events described in this Complaint. Hild wants to marry his girlfriend, but he fears that doing so would expose his girlfriend (whose identity Owens' and her audience have not yet exposed) to danger and harassment.

289. Hild's girlfriend's career field involves high visibility and public appearances. When Hild attends her public appearances, he sits in the back and avoids being seen with her out of fear that being seen together will reveal her identity or cause Owens' audience to associate her with him, thereby putting her at risk of harm.

290. As a direct result of Defendants' actions, Hild's reputation has also been materially harmed. On multiple occasions, Hild has been accused in person by strangers (presumably Owens' fans) of being the murderer of Charlie Kirk or at least an accomplice. Hild's friends and family have likewise heard rumors about Hild being involved in the Kirk assassination.

291. As a direct result of living in fear and anxiety, Hild has experienced suicidal ideation, leading medical professionals to place him on antidepressants.

292. Search engine and social media queries for "Robert", "Robbie", "Rob Hild" or "Robby Hild" prominently return results about Owens' statements linking Hild to Kirk's assassination, which has impaired his ability to advance his career through graduate education and job applications.

293. Hild has avoided professional events because he reasonably fears that Owen's false statements will expose him to unwarranted scrutiny, stigma, or harm.

L. <u>Owens Admits the Individual in the Stairwell was Robinson.</u>

294. Nearly a year after her first burst of podcast episodes about Hild, and after the damage to Hild's reputation was done, Owens tacitly admitted that she knew the individual pictured in the stairwell at the Event was in fact Tyler Robinson. In Episode 388 of *Candace*, dated September 16, 2026, "the footage we released of Tyler Robinson, the version in the American shirt, walking to—onto the UVU campus." In other words, Defendants knew that the individual in the stairwell was Tyler Robinson, and not Hild. Yet Defendants never made any effort to clear Hild's name or remedy the harm they caused him.

FIRST CAUSE OF ACTION

Defamation *Per Se* (Against All Defendants)

295. Hild realleges and incorporates by reference each and every allegation set forth above as though fully stated herein.

296. Defendants published statements implying that Hild is the individual depicted in the FBI's stairwell photographs of Kirk's suspected murderer. These statements, considered in their full context, conveyed to the reasonable viewer that Hild was responsible for, involved in, or connected to, the plot to assassinate Charlie Kirk.

297. The statements were false. At the time Defendants published them, photographic and video evidence existed and was available to Defendants through C.B. and Shaner Broderick, establishing that Hild was photographed in the crowd at the Event at the same time the FBI's stairwell footage was captured. Hild's documented presence in the crowd at the precise moment the stairwell photographs were taken rendered it physically impossible for Hild to be the individual depicted in the stairwell photographs. Defendants thus knew, or in the exercise of even minimal diligence would have known, that Hild could not be the person shown in the FBI's stairwell photographs.

298. The statements are defamatory on their face as they impute to Hild responsibility for or involvement in the assassination of a public figure.

299. The imputation exposed Hild to public hatred, contempt, and ridicule, and injured Hild in his reputation and standing in the community.

300. Defendants' publications identified Hild to the public. By using Hild's name, likeness, photographs, and other identifying information, Defendants ensured that viewers and followers could and did identify Hild as the subject of their implied accusations.

301. Hild is a private individual. He is neither a public official nor a public figure. Hild

did not voluntarily inject himself into any public controversy, nor does he occupy a position of pervasive public influence.

302. Defendants' statements were made with actual malice or, at a minimum, with negligence as to their truth or falsity. Defendants acted with knowledge of falsity or reckless disregard for the truth and the rights of others, as demonstrated by the following:

a. Prior to publishing Episode 245, Defendants received an email from C.B. stating that she personally knew Hild and that he had been in the audience at the Event. Defendants did not respond to C.B., did not ask how she knew Hild, did not ask for the basis of her statement that Hild had been at the Event, and otherwise did not seek any facts from her. Had Defendants made even a minimal inquiry, C.B. would have provided information identifying Hild and confirming his presence in the audience—information directly contradicting the narrative Defendants were preparing to publish. Defendants instead proceeded to publish Episode 245 while representing to their audience that the individual could not be identified, a representation contradicted by C.B.'s communication that Defendants had received and chose not to pursue.

b. Defendants received two separate messages from Broderick, offering to speak directly with Owens and to provide photographs and a video he had taken related to the Instagram posts Defendants had been discussing. Defendants did not respond to either message, took no action to set up a phone call, and did not request the offered photographs or video. Had Defendants accepted the offer, the resulting conversation would have led to information identifying Hild and would have provided Defendants with an additional eyewitness confirming Hild's presence in the audience at the Event and his whereabouts when the FBI

stairwell photograph was taken. Defendants instead proceeded to publication without seeking any facts from Broderick.

c. After Roommate provided exculpatory evidence demonstrating that Hild was photographed in the crowd at 11:52 a.m.—the same time the FBI's stairwell footage was captured—and eyewitness testimony of Hild's whereabouts on the morning and evening of September 10, 2025, Defendants refused to retract and instead shifted their narrative to assert, contrary to the Indictment, that the stairwell photographs had no confirmed timestamp. This manufactured a false basis to continue publishing the theory that the individual depicted in the FBI's stairwell photographs could be Hild.

d. Defendants' deliberate refusal to pursue readily available sources constitutes a departure from even the most basic standards of journalistic due diligence. A reasonable journalist, upon receiving communications expressly offering to provide exculpatory evidence, would have followed up before publishing accusations implying involvement in an assassination. Defendants' decision to ignore these offers demonstrates a purposeful avoidance of the truth.

e. Owens told Piers Morgan that she does not name individuals without "concrete evidence," yet Defendants named Hild and displayed his photograph on the podcast without any concrete evidence linking him to Kirk's assassination.

f. Defendants refused to issue a retraction and instead stated they were "still looking into him," perpetuating the narrative even after being confronted with exculpatory evidence establishing that Hild had nothing to do with Kirk's assassination.

g. Owens admitted in Episode 388 of *Candace* that the individual in the stairwell

photograph was in fact Tyler Robinson.

303. The foregoing facts, taken individually and collectively, establish that Defendants published their statements with actual knowledge of falsity or, at a minimum, with reckless disregard for the truth and the rights of others. Defendants were presented with exculpatory evidence on multiple occasions, through multiple channels, and deliberately chose to ignore, suppress, and contradict that evidence to sustain a false narrative about Hild.

304. As a direct and proximate result of Defendants' conduct, Hild has suffered harm to his reputation, emotional distress, mental anguish, humiliation, loss of standing in his community, and other damages in an amount to be determined at trial.

305. Hild is entitled to an award of punitive damages because Defendants engaged in willful and malicious conduct with a knowing and reckless indifference to the rights of others.

SECOND CAUSE OF ACTION

Implied Defamation (Against All Defendants)

306. Hild realleges and incorporates by reference each and every allegation set forth above as though fully stated herein.

307. In addition to their express false statements, Defendants published a series of statements that were deliberately structured and presented to create false and defamatory implications about Hild. Through the juxtaposition, omission, and selective presentation of facts, Defendants created a mosaic of false implications which, taken together, communicated to the reasonable viewer that Hild is a dangerous criminal involved in an assassination, a foreign agent, a sleeper cell terrorist, and an extremist affiliated with subversive underground movements.

308. Defendants published statements implying that Hild is the individual depicted in the FBI's stairwell photographs of the suspected shooter. By placing Hild's image alongside the FBI's stairwell photographs and inviting viewers to draw connections between the two, Defendants

created the false and defamatory implication that Hild was responsible for, involved in, or connected to, the plot to assassinate Kirk, without possessing any evidence to support such an implication.

309. These implications were demonstrably and knowingly false at the time they were made. Video evidence existed—and was available to Defendants—establishing that Hild was in the crowd at the Event at the same time the stairwell footage was captured, rendering it physically impossible for Hild to be the individual in the stairwell photographs.

310. Defendants published the following false and defamatory statements: that "no one emailed us" and that no one "came forward" to identify Hild. These statements carried the clear and defamatory implication that Hild's identity was unknown, unverified, or deliberately concealed. This suggested to listeners that Hild was actively concealing his identity because he had something to hide, and that no one was willing or able to vouch for his innocence. These statements also fed into the false preconceived narrative that Hild was a foreign operative.

311. These implied accusations were demonstrably and knowingly false at the time they were made. Defendants had already received and were in possession of: (a) C.B.'s email identifying Hild; and (b) Broderick's two separate written responses expressly offering to speak to Owens and provide information relevant to Hild's identity and whereabouts at the time the stairwell photograph was taken. The false implication that no one had come forward was a deliberate fabrication designed to mislead viewers into believing that Hild's guilt was uncontested, substantially amplified by Defendants' deliberate suppression of the communications they had already received.

312. Defendants published statements suggesting or implying that Hild could be a foreign agent or a member of a sleeper cell terrorist group. These statements carried the profoundly injurious implication that Hild poses a threat to national security and was engaged in clandestine

operations on behalf of a hostile foreign power or terrorist organization, exposing Hild to public hatred, fear, and contempt.

313. These implications were demonstrably and knowingly false at the time they were made. Defendants possessed no credible evidence to support the implication that Hild is a foreign agent, a member of a sleeper cell, or in any way affiliated with any foreign intelligence service or terrorist organization. No government agency has identified, charged, investigated, or designated Hild as a foreign agent or terrorist operative, and no facts known to Defendants at the time of publication provided any legitimate basis for such an implication.

314. Defendants published statements asserting or implying that Hild is associated with a "gothic underground" or "communist underground." These statements carried the clear and defamatory implication that Hild harbors extremist, subversive, or dangerous ideological affiliations.

315. These implications were demonstrably and knowingly false at the time they were made. The photographs upon which Defendants based these defamatory implications were taken at a publicly advertised Halloween costume party—a fact that was readily ascertainable from the source of the images themselves. By deliberately stripping the photographs of their innocent context and presenting them as evidence of extremist affiliations, Defendants manufactured a false and sinister narrative about Hild's character and associations.

316. Considered together, the totality of Defendants' publications created a cumulative false implication far more damaging than any individual statement alone. Through the deliberate arrangement and juxtaposition of selectively presented facts, misleading omissions, and baseless innuendo, Defendants constructed a false narrative portraying Hild as a dangerous, secretive individual connected to political violence, foreign espionage, terrorism, and extremist ideologies. The reasonable viewer, viewing Defendants' publications as a whole, would understand them to

convey the defamatory implication that Hild is a criminal, a terrorist sympathizer, and a threat to public safety—none of which is true.

317. Defendants' defamatory implications readily identified Hild to millions of people. By using Hild's name, likeness, photographs, and other identifying information, Defendants ensured that viewers and followers could and did identify Hild as the subject of their false and defamatory implications.

318. Defendants made these statements to millions of viewers and followers through widely disseminated podcast episodes, social media posts, and public solicitations for information about Hild, thereby publishing the defamatory implications to third parties on a massive scale.

319. Hild is a private individual and is neither a public official nor a public figure. Hild did not voluntarily inject himself into any public controversy, nor does he occupy a position of pervasive public influence.

320. The statements were made with actual malice or, at a minimum, with negligence as to their truth or falsity.

321. Defendants deliberately structured their publications to imply false and defamatory facts about Hild while simultaneously not revealing the exculpatory evidence available to them that would have negated the false implications they intended to create.

322. As a direct and proximate result of Defendants' conduct, Hild has suffered severe and ongoing harm to his reputation, emotional distress, mental anguish, humiliation, loss of standing in his community, and other damages in an amount to be determined at trial.

323. Hild is entitled to an award of punitive damages because Defendants engaged in willful and malicious conduct with a knowing and reckless indifference to the rights of others.

THIRD CAUSE OF ACTION

Intentional Infliction of Emotional Distress (Against All Defendants)

324. Hild repeats and realleges each of the aforementioned allegations as if fully alleged herein.

325. Defendants' conduct escalated beyond mere publication of false implications, constituting extreme and outrageous conduct that offends the generally accepted standards of decency and morality.

326. Upon information and belief, Defendants were (and are) motivated by financial self-interest. Following Kirk's assassination, Defendants' podcast experienced a substantial surge in viewership and audience engagement. Recognizing that the content concerning the assassination was driving unprecedented growth and profit, Defendants deliberately sensationalized every aspect of the story to sustain and expand their audience and the revenue derived therefrom. Defendants used Hild's image and identity to advance the narrative they were monetizing. Indeed, most *Candace* episodes since October 2025 have referenced Kirk's assassination, reflecting Defendants' calculated decision to exploit Hild's life and reputation as an ongoing source of content to drive viewer engagement and profit.

327. Specifically, Defendants engaged in an orchestrated campaign of conduct—distinct from and beyond any protected speech—that included (a) deliberately mobilizing an audience of millions of followers as instruments of harassment by issuing repeated, specific calls to action directing followers to help identify, locate, and report on Hild; (b) knowingly failing to reveal exculpatory evidence in their possession—including C.B.'s email identifying Hild as an innocent bystander and Broderick's two written offers to provide clarifying information—while simultaneously and falsely representing to their audience that "no one emailed us" and "no one came forward," thereby manufacturing the false appearance that Hild's guilt was uncontested; (c)

weaponizing audience engagement by soliciting "tips" about Hild through dedicated tip lines, creating secondary tip lines when the first reached capacity, and channeling resulting harassment, death threats, and stalking behavior toward a private individual whom Defendants knew was likely to be innocent; (d) employing coercive tactics by conditioning the "clearing" of Hild's name on receipt of exclusive information, a pattern Defendants have used against other individuals identified on their show; and (e) deliberately stripping context from innocuous photographs—taken at a publicly advertised Halloween costume party—and fabricating a false narrative of extremist affiliation by labeling the event a "gothic underground" and "communist underground," manufacturing a sinister identity for Hild from whole cloth.

328. Defendants' conduct constitutes the type of extraordinarily vile conduct, conduct that is atrocious, and utterly intolerable in a civilized community

329. Defendants did not merely publish false accusations; they orchestrated a sustained campaign of operational conduct designed to direct the violent energies of millions of followers against a private individual whom they had no evidence to doubt his innocence, while deliberately suppressing the evidence that would have exonerated him. Defendants subjected Hild to a sustained multi-month course of conduct that included directing their audience to identify Hild, selectively declining to pursue leads and sources within their possession or reach that would have exposed the falsity of their implications, soliciting public tips and information about Hild, and creating conditions that foreseeably resulted in death threats, stalking, harassment of family members, vandalism, and Hild being forced to relocate from his home state.

330. The outrageousness of Defendants' conduct is further compounded by their profit motive. Defendants did not pursue this course of action out of genuine concern for public safety or journalistic inquiry. Rather, Defendants recognized that the assassination story—and Hild's supposed involvement—was a ratings driver that attracted millions of new viewers and generated

substantial advertising and subscription revenue. Defendants made a deliberate editorial choice to continue exploiting Hild episode after episode, month after month, because doing so was financially lucrative. The decision to destroy a private individual's life and reputation for commercial gain, while knowingly or recklessly disregarding that individual's innocence, is the hallmark of conduct so extreme and outrageous as to exceed all possible bounds of decency.

331. Defendants intended to cause or acted in reckless disregard of the likelihood of causing, emotional distress to Hild by: (a) persisting in their campaign despite having received direct evidence of Hild's innocence from multiple sources; (b) explicitly refusing to retract or apologize, stating they were "still looking into him" after being confronted with exculpatory evidence; (c) issuing repeated calls to action directing their audience to send "tips" about Hild when a foreseeable consequence of mobilizing an audience of that size against a named private individual—falsely implicated in a high-profile assassination—would include, death threats, stalking, doxxing, and vandalism directed at Hild; and (d) escalating the campaign over multiple months and multiple episodes despite mounting evidence of severe harm to Hild. Defendants' profit motive, evidenced by a subscriber increase of approximately 650,000 in a single month attributable to content targeting Hild, further demonstrates their reckless indifference to the foreseeable consequences of their conduct.

332. Defendants' conduct proximately caused Hild's emotional distress. Defendants issued specific calls to action; their audience responded with death threats, stalking, doxxing, and vandalism; and Hild suffered the severe emotional distress described herein as a direct and foreseeable consequence of Defendants' deliberate mobilization of their audience against him.

333. Hild is a private individual and is neither a public official nor a public figure.

334. As a direct and proximate result of Defendants' conduct, Hild suffered severe emotional distress so extreme that no reasonable person could be expected to endure it.

Specifically, Hild suffered: (a) acute and ongoing anxiety and fear for his personal safety requiring him to flee the State of Utah for several months; (b) inability to sleep, persistent hypervigilance, and fear of being recognized and harmed; (c) social isolation and withdrawal from professional, religious, and personal activities; (d) humiliation and shame resulting from being publicly associated with an assassination and extremist ideologies before millions of viewers; (e) disruption of personal relationships, professional opportunities, and his ability to conduct normal daily activities; and (f) emotional distress.

335. Hild has sustained damages in an amount to be determined at trial.

336. Hild is entitled to an award of punitive damages because Defendants engaged in willful and malicious conduct with a knowing and reckless indifference to the rights of others.

FOURTH CAUSE OF ACTION

False Light Invasion of Privacy (Against All Defendants)

337. Hild repeats and realleges each of the aforementioned allegations as if fully alleged herein.

338. Defendants publicized statements concerning Hild which, through deliberate implication, placed him before the public in a false light.

339. Specifically, Defendants gave publicity to the following matters concerning Hild through widely disseminated podcast episodes, social media posts, and public solicitations viewed by millions, which were designed to and did convey false and misleading impressions: (a) that Hild is the individual depicted in the FBI's stairwell photographs of Kirk's suspected assassin; (b) that Hild is associated with a "gothic underground" and/or a "communist underground;" (c) that Hild could be a foreign agent or member of a sleeper cell terrorist group; and (d) that "no one had emailed us" or "came forward" to identify Hild, implying his identity was deliberately concealed because he had something to hide. Each of these communications, taken individually and

collectively, created a false impression of Hild through suggestion, juxtaposition, and selective presentation of information.

340. The false light in which Hild was placed would be highly offensive to a reasonable person.

341. Defendants' publications, through their cumulative implications and suggestive framing, constitute major misrepresentations of Hild's character, history, activities, and beliefs.

342. Falsely portraying a private, devout religious individual as a participant in a political assassination, a member of extremist underground organizations, and a potential foreign intelligence operative would be highly offensive to any reasonable person. Defendants knew, or at a minimum recklessly disregarded, the falsity of the impressions their communications created and the false light in which those implications would place Hild. Despite having no factual basis for the implications they conveyed, failing to conduct a reasonable investigation, and disregarding the readily available information contradicting their insinuations (including the opportunity to speak with Broderick and C.B.), Defendants published and repeatedly amplified the false narrative about Hild to their massive audience.

343. As a direct and proximate result of Defendants' conduct, Hild, who affirmatively maintained a private life with minimal social media presence and no public profile, has been involuntarily thrust before millions of viewers in a profoundly false and offensive light.

344. As a direct and proximate result of Defendants' conduct, Hild has suffered harm, including but not limited to, emotional distress, mental anguish, humiliation, loss of privacy, interference with personal relationships, loss of business opportunities, and other damages in an amount to be determined at trial.

345. Hild is entitled to an award of punitive damages because Defendants engaged in willful and malicious conduct with a knowing and reckless indifference to the rights of others.

JURY DEMAND

346. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Hild demands a jury trial on all claims and issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Hild prays for judgment against Defendants as follows:

A. General and special damages, including damages for injury to reputation and emotional distress;

B. Punitive damages for conduct motivated by malice or reckless disregard for the rights of others;

C. Costs and reasonable attorney's fees to the extent permitted by law; and

D. For any such and further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED this 9th day of October, 2026.

By: /s/ *E. Scott Savage*
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**pro hac vice* pending