

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE)
)
-and-)
)
EARTH INTELLIGENCE NETWORK)
)
Plaintiffs,)
)
v.)
)
JASON GOODMAN)
PATRICIA A. NEGRON)
)
-and-)
)
QUEEN TUT, A Woman Believed To Be)
Known As Carla A. Howell)
)
Defendants.)
_____)

Case No. 3:17cv601

COMPLAINT

Plaintiffs, Robert David Steele and Earth Intelligence Network, by counsel, file the following Complaint against Defendants, Jason Goodman (“Goodman”), Patricia A. Negron (“Negron”), and Queen Tut, a woman believed to be known as Carla A. Howell, jointly and severally.

Plaintiff seeks (a) compensatory damages, statutory damages (three-fold the damages sustained), and punitive damages in an amount not less than \$15,350,000.00, (b) prejudgment interest on the principal sum awarded by the Jury from June 15, 2017 to the date of Judgment at the rate of six percent (6%) per year, (c) attorney’s fees pursuant to §

18.2-500 of the Virginia Code (1950), as amended, and (d) costs – arising out of Defendants’ defamation *per se*, insulting words, business conspiracy, common-law conspiracy, and tortious interference with contract and business expectancies.

Introduction

This is not a case about the First Amendment or protected speech.

This is a case about the conscious and deliberate destruction of a man’s untarnished name and impeccable reputation by social media vigilantes and trolls. The Defendants are the poster children of actual malice – stalking the Plaintiffs on the Internet, publishing and republishing videos and enticing their subscribers and confederates to make and publish false and defamatory statements, all calculated to injure the Plaintiffs’ reputation and business.

In *Rosenblatt v. Baer*, Mr. Justice Stewart observed that:

“‘Society has a pervasive and strong interest in preventing and redressing attacks upon reputation.’ The right of a man to the protection of his own reputation from unjustified invasion and wrongful hurt reflects no more than our basic concept of the essential dignity and worth of every human being—a concept at the root of any decent system of ordered liberty ... The destruction that defamatory falsehood can bring is, to be sure, often beyond the capacity of the law to redeem. Yet, imperfect though it is, an action for damages is the only hope for vindication or redress the law gives to a man whose reputation has been falsely dishonored. Moreover, the preventive effect of liability for defamation serves an important public purpose. For the rights and values of private personality far transcend mere personal interests. Surely if the 1950’s taught us anything, they taught us that the poisonous atmosphere of the easy lie can infect and degrade a whole society.”

383 U.S. 75, 92-93 (1966); *id. Gazette, Inc. v. Harris*, 229 Va. 1, 7, 325 S.E.2d 713 (1985) (“In Virginia, as in other states, the law of defamation historically has protected a basic interest. The individual’s right to personal security includes his uninterrupted entitlement to enjoyment of his reputation.”) (citation omitted).

In this case, Plaintiffs seeks to protect and vindicate their good name and reputation from the poisonous, indecent, specious charges of fraud, stealing and other wrongdoing levelled against them by the Defendants and their agents.

Parties

1. Plaintiff, Robert David Steele (“Robert”), is a citizen of Virginia. Robert is 65 years-old. Robert received a B.A. in political science from Muhlenberg College in 1974 and an M.A. in international relations from Lehigh University in 1976. From 1975 to 1979, he served in the United States Marine Corps as an officer variously assigned to infantry, intelligence and security/personnel duties in Asia and the United States. Following his service as a Marine, Robert remained in the Marine Forces Reserve until 1996 as an adjunct faculty member at Marine Corps University and developer of the Marine Corps Master Intelligence Plan, ultimately attaining the rank of Major. In 1979, he joined the Central Intelligence Agency (“CIA”) as an operations officer. As a CIA operation officer, Robert obtained a Top-Secret Security Clearance. During three tours overseas, focused on extremist and terrorist targets in Latin America, Robert managed over 100 clandestine assets. Hand-picked to pioneer advanced information technology for the CIA, Robert was a member of the Advanced Information Processing & Analysis Steering Group and the Advanced Program & Evaluation Group. In 1987, he received a second master’s degree in Public Administration from the University of Oklahoma, where he completed a thesis on strategic and tactical national security information management and was elected to Pi Alpha Alpha. In 1990, Robert received a Professional Certificate in Defense Studies from the Naval War College. Robert resigned from the CIA in 1988 to accept an invitation from the Marine Corps to establish the Marine Corps

Intelligence Center as a GM-14 civil servant, where he remained until 1993. In 1993, Robert formed Open Source Solutions, Inc., a pioneering open source intelligence (“OSINT”) firm. OSINT is a term used to refer to data collected from publicly available sources to be used in an intelligence context. In the intelligence community, the term “open” refers to overt, publicly available sources (as opposed to covert or clandestine sources). Robert was Chief Executive Officer of Open Source. For over twenty (20) years, Robert has dedicated himself to teaching individuals and organizations about the value of holistic analytics, true cost economics, and Open Source Everything Engineering (OSEE). Robert’s education, experience, and publications, awards and recognitions are catalogued on his website, <http://robertdavidsteele.com/>. Robert’s work has been universally commended. Lieutenant General Patrick Hughes praised Robert as follows:

	<i>Robert Steele deserves our admiration and our focused attention for bringing the idea of open source information to the fore. His passion to serve the nation by developing this new approach...is exemplary.</i>
<i>Pat Hughes</i>	Lieutenant General Patrick Hughes, U.S. Army (Retired) Former Director, Defense Intelligence Agency

Major General Pierre Lacoste described Robert as follows:

	<i>Constantly committed to truth and honesty, [his work] demonstrates his ability to grasp the real issues and to take into account the views and concerns of men of good will from all nations and all cultures.</i>
<i>Pierre Lacoste</i>	Admiral Pierre Lacoste, French Navy (Ret), Former Director of Foreign Intelligence (DSGE)

In January 2017, Robert was nominated for the Nobel Peace Prize. Until publication and republication of the Defendants' videos, emails, tweets and other statements at issue in this action, Robert enjoyed an untarnished reputation.

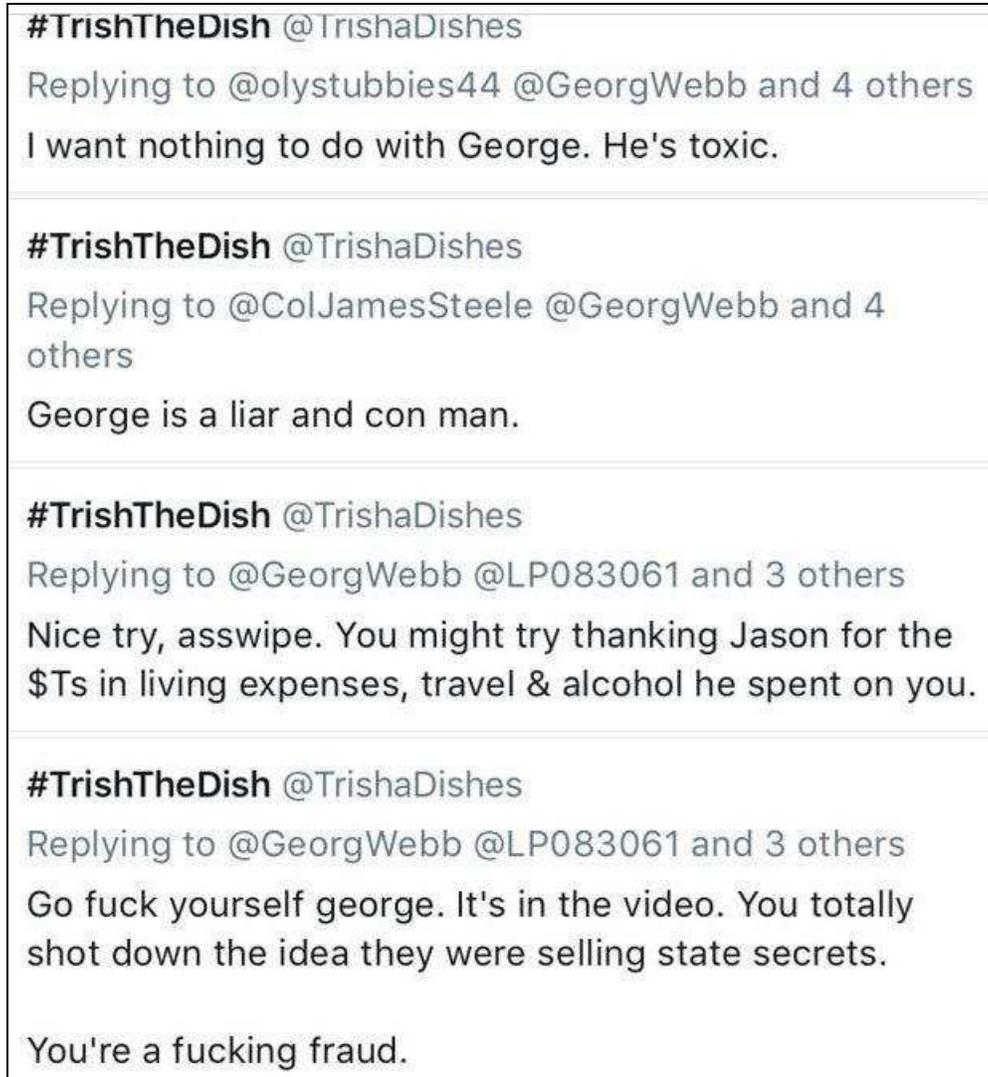
2. Plaintiff, Earth Intelligence Network, is a not-for-profit, 501(c)(3) corporation founded by Robert in 2006 (Virginia State Corporation Commission ID # 0670760-8) (Federal EIN # 20-828XXXX). The original purpose and long-term focus of Earth Intelligence Network is to teach citizens the urgency of demanding holistic analytics, true cost economics, and Open Source Everything Engineering (OSEE) as the foundation for enlightened self-governance. One of Earth Intelligence Network's projects is called "#UNRIG". #UNRIG is an educational campaign to communicate to all citizens the possibility of an ethical, legal, non-violent restoration of integrity to the United States Government. #UNRIG's campaign is funded by public donations. Earth Intelligence Network is fully transparent and accountable to its donors. All funds raised for the #UNRIG national tour are accounted for at the Budget Page published on the website of for the #UNRIG project, <https://www.unrig.net/>.

3. The core team members of the Earth Intelligence Network are Robert and Dr. Cynthia Ann McKinney ("Dr. McKinney"). Dr. McKinney is the first black woman to be elected to Congress from Georgia. She served six (6) terms as a Democrat. In 2008, she left the Democratic Party to accept the Presidential nomination of the Green Party. Dr. McKinney has an established reputation as one of the most ethical political figures of our time, and one of the most persistent in seeking out the truth on all matters. She is internationally-recognized as a humanitarian and anti-war activist. In August 2015, Dr. McKinney was awarded a PhD in Leadership and Change from Antioch

University. Today, she teaches a US-accredited Master of Business Administration (MBA) program in Bangladesh. At Robert's request, Dr. McKinney agreed to return home to the United States in 2017 to nurture a national conversation about #UNRIG, called the Summer of Peace.

4. Defendant, Goodman, is an individual who is a citizen of New York. Goodman claims to be a graduate of New York University (BFA Film), an actor, and Hollywood cinematographer. He publishes a profile on LinkedIn that may be accessed by clicking: <https://www.linkedin.com/in/21stcentury3d>. Goodman claims to be the CEO of 21st Century 3D, which Goodman describes as "a full-service stereoscopic 3D motion picture production company with offices in New York City and Los Angeles." Goodman has substantial experience in the production and upstreaming of live-action videos. He owns, maintains and operates multiple Internet and social media properties, including a YouTube Channel (www.youtube.com/channel/UC8Cl9QaRtuW9CNjP7pP4BBQ), a Facebook (<https://www.facebook.com/Crowdsource-The-Truth-1331354320209243/>), and a Twitter account (<https://twitter.com/csthetruth?lang=en>). The name of Goodman's social media properties is "Crowdsource The Truth" ("CSTT"). Goodman claims that CSTT is the "original open source independent news agency". According to Goodman, "Crowdsource the Truth is an independent news organization dedicated to truth in media and integrity in government. Our process is driven by a unique, open source fact checking 'truth engine' that has been described as a combination of investigative journalism, social media and reality television." As of September 1, 2017, 14,526 people subscribed to Goodman's YouTube Channel, 1,925 people followed Goodman on Facebook, and Goodman had 8,886 followers on Twitter.

5. Goodman and Negron use social media – specifically YouTube and Twitter – as a weapon and platform to defame and spread lies about people, including Plaintiffs. Goodman and Negron automatically label anyone who disagrees with them as frauds, liars and con men. For instance, in published tweets Negron recently branded George Webb as follows:



Goodman uploads new videos to YouTube almost every day. Goodman's videos have generated almost 4,000,000 views to date. This action involves multiple videos created

and produced by Goodman, Negron and Queen Tut between June 15, 2017 and the present, uploaded and published on YouTube and other social media sites.

6. Defendant, Negron, is an individual who is a citizen of Massachusetts. Negron is Goodman's girlfriend. At all times relevant to this action, Negron acted in concert with and as an agent, alter ego or instrumentality of Goodman. Negron claims to be the founder of "U.S. News Corps", a company whose mission it is to "shine a bright light on the news stories that need to be told. We seek to break through official narratives and escalating censorship to find truth, supported by solid evidence." Negron represents in her LinkedIn profile that she has a degree in criminal justice from Armstrong State University and a certificate of special studies, "CSS, Administration and Management", from Harvard University's Extension School. Like Goodman, Negron has her own YouTube Channel, called "Patricia Negron". Negron claims that her channel is devoted to "[i]nvestigative research & reporting on current events not covered, or suppressed, by MSM". Negron's social media pseudonym is "Trish the Dish".

7. Defendant, "Queen Tut", is a person believed to be Carla A. Howell. Howell is a citizen of New Jersey. She is a political activist. There is a biography of her on the Internet. See https://en.wikipedia.org/wiki/Carla_Howell. At all times relevant to this action, Queen Tut acted in concert with and as an agent, alter ego or instrumentality of Goodman and Negron.

8. Goodman and Negron are sophisticated high net worth individuals, who have sufficient assets and net worth to pay punitive damages in the maximum amount permitted under Virginia law.

Jurisdiction and Venue

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

10. Venue is proper in the Richmond Division of the United States District Court for the Eastern District of Virginia because the Defendants and their agents published and republished defamatory statements to a wide audience that includes persons who reside within the Richmond Division.

Statement of the Facts

11. On June 15, 2017, Robert was scheduled to be interviewed by Goodman and Negron. Goodman and Negron planned to live-stream the interview on CSTT's YouTube Channel.

12. On June 14, 2017, however, Goodman and Negron published a video on YouTube entitled, "Clear and Present Danger (Calm Before the Storm?) #maerskmemphis". [See <https://www.youtube.com/watch?v=ekr5cw2WAbU>]. In the video, Goodman and Negron reported that "George Webb" had "intel" from "Deep Uranium" indicating a "strong possibility of Clear and Present Danger due to illicit radiological material on board the Maersk Memphis". Goodman also published a video on YouTube of his interview with "George Webb" about the Coast Guard's "sweep" of the Maersk Memphis for a "dirty bomb". [<https://www.youtube.com/watch?v=Tj-EUz5JeFQ&feature=youtu.be>]. Goodman and Negron encouraged the "Crowdsourcing community" to spring into action and alert the United States Coast Guard that there was a

“dirty bomb” aboard the Maersk Memphis. At 1:54:50 of the video, Goodman told CSTT subscribers to “Call the port authority – that’s an excellent idea. Someone call the port authority there – in Charleston.” Someone, in fact, called in the putative dirty bomb threat, which caused a terminal at the Port of Charleston, South Carolina, to be shut down.

13. In truth, there was no “intel”. The news was fake. The dirty bomb was a hoax.

14. The Federal Bureau of Investigations (“FBI”) immediately opened an investigation into the false report of a dirty bomb aboard the Maersk Memphis. The FBI opened its investigation because it is a crime to make a false threat against a U.S.-flagged ship.

15. As a result of the “Dirty Bomb” hoax, Robert chose to distance himself from Goodman, Negrón and CSTT. Robert immediately canceled the planned interview. He informed Goodman by private email that he (Robert) no longer wanted anything to do with Goodman and CSTT.

16. Upon receipt of Robert’s email, and in retaliation and reprisal for Robert’s decision to no longer have anything to do with Goodman and CSTT, Goodman, Negrón and Queen Tut began an unprecedented smear campaign against Robert.

17. Beginning on June 15, 2017 and continuing through August 30, 2017, Goodman, Negrón and Queen Tut, acting together and in concert (and most times together on camera), published the following actionable statements of and concerning Robert:

- On June 15, 2017, Goodman and Negron published a video on YouTube entitled, “Deep State Panic Attack”. As of September 1, 2017, the video was accessible by clicking: <https://www.youtube.com/watch?v=461eDj6Rxqw&feature=youtu.be>. In this video, Goodman encourages viewers to demand a return of their donations from #UNRIG. At 4:24 of the video, Goodman states “The comments I kind of agree with. I was a little bit cautious with Robert David Steele and I didn’t trust him either, Pamela, when he went on Fandango’s¹ show yesterday ... so yeah, I want my money back too Karen. I’m going to go to call American Express and see if I can cancel that donation.” At 20:55 of the video, Goodman states “So Alex says RDS is a scam. I got to admit I feel a little betrayed by him because I think if he was a friend of even a remotely nice guy he could have warned me in a much nicer way.”

- On June 16, 2017, Goodman published a video on YouTube entitled, “Getting the Dirty Bomb Story Straight”. As of September 1, 2017, Goodman’s YouTube video was accessible by clicking the following hyperlink: <https://www.youtube.com/watch?v=OBBrE3lehCY&feature=youtu.be>. At 20:24 of the video, Goodman states “We made a big mistake with Robert David Steele and I’m going to have to communicate with him about this ... We’ve raised a lot of money for him. We need to apologize to you guys for doing that, and I’m not suggesting. I’m not saying you should get your money back from Robert Steele. He specifically told me he would get very pissed if people did ask for their money back which I found a curious thing for him to say.”

¹ The reference to “Fandango” is a reference to Manuel Chavez, a content creator and publisher of videos, known on the Internet as “Defango”.

- On June 16, 2017, Goodman and Negrón published a video on YouTube entitled, “The Failing New York Times”. As of September 1, 2017, the Goodman/Negrón YouTube video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=CS0GZaR6b6U&feature=youtu.be>. At 16:10 of the video, Goodman states “I want to invite our friend, Robert David Steele, to uh give back the money to all the people that we raised money for his organization the other day. We have been getting so many emails from people who are angry and I don’t want to tell everybody to demand their money back because Robert David Steele has specifically told me I had better not do that, so I’m inviting him to graciously refund it to anyone who is angry again, and there are a lot of people.” At 24:45, Goodman states “So I’m making an open call right now. Everyone should just go directly to their credit card company and cancel the charge and if there are financial crimes experts out there I’d like to know if its legal for Mr. Robert David Steele to make up lies about me ... and spread these lies to our viewers”. On and after June 16, 2017, many of #UNRIG’s donor’s followed Goodman’s direction, and demanded the return of their donations. Many, acting upon Goodman and Negrón’s advice and at their direction, filed claims of “fraud” with their banks to undo and reverse the donations to #UNRIG.

- On June 20, 2017, Goodman and Negrón published a video on YouTube entitled, “COG”. As of September 1, 2017, the video may be accessed by clicking: https://www.youtube.com/watch?v=gaa_XEP4lb4&feature=youtu.be. Beginning at 25:26 of the video, Goodman states “Trish – I’m glad you mentioned stealing, because you’ve just reminded me of something – particularly the robber David Steele ... Many of

our viewers have expressed real anger at feeling tricked by the campaign from Robert David Steele. And I assure you, we were tricked by him as well”.

- On June 26, 2017, Goodman published a video on YouTube entitled, “Queen Tut call re: Robert David Steele #Unrig Fraud Claim”. As of September 1, 2017, the video was accessible by clicking the following hyperlink: https://www.youtube.com/watch?v=hR6uxM_wyMs. Goodman describes the video as follows: “The angry response from the Crowdsorce community regarding the individual I have (somewhat) jokingly dubbed “The Robber David who Steals” has been overwhelming. Many Crowdsorce community members have been sending me email exchanges they have having [sic] with RDS and they are not happy. People in our community want their money back and I support them in this pursuit. Confidential Crowdsorce contact Queen Tut believes RDS has perpetrated a deliberate fraud and details her position in this phone call. Become a sponsor of Crowdsorce the Truth”. During this interview, Goodman and Queen Tut make the following statements: At 2:49 of the video, Goodman states, “Well I think he’s a targeter, he’s a person er I mean I question if he, if any of his credentials are authentic. I think he’s just a cheap con man.” Queen Tut then says, “I totally agree”. At 3:42, Goodman states, “Well that’s his motto. What can you do for me?” At 4:18, Goodman states, “He knows it’s a useless campaign he’s just trying to suck \$250,000 out of people.” At 4:52, Queen Tut states, “Oh man, I get it. He’s really conning people and he’s trying to manipulate me.”. At 6:11, Queen Tut states, “That’s the last email I sent and I knew I got him ok.” At 8:21, Goodman states, “I think he’s involved in a pretty serious financial scam. Uh, I think that there’s a possibility that a Rico charge could be involved because he has Defango with him. I

think that he's uh defrauding people across state lines. I mean I'm not a lawyer of course, but it seems like he is doing things that are very criminally actionable." At 9:13, Queen Tut states, "His MO of like threatening and crushing the little guy, but sucking up to the power players is very obvious." At 11:02, Goodman states, "You know I'm obviously not a mental health professional but it certainly seems he's got some kind of schizophrenic behavior there." Queen Tut then states, "And I believe he is an intentional operator", to which Goodman states, "Oh, I agree". At 13:43, Queen Tut states, "When you look at his behavior, his pattern of behavior with this scam of the Electoral Reform ... I think Cynthia is the latest in the reinvention". At 26:26, Goodman states, "Its people who are sick and tired of people like Robert David Steele. The robber David who Steals."

- On June 26, 2017 at 2:11 p.m., Goodman republished his interview with Queen Tut by tweeting the YouTube video to his Twitter followers.

- The June 26, 2017 Goodman/Queen Tut YouTube video was republished on multiple different websites, including *SexyFunnyClips.com*. As of September 1, 2017, the republication may be accessed by clicking the following link: http://www.sexyfunnyclips.com/video/hR6uxM_wyMs/queen-tut-call-re-robert-david-steele-unrig-fraud-claim/.

- On June 27, 2017, Goodman published a video on YouTube entitled, "FRANK BACON Call Regarding Robbing and Stealing #unrig". As of September 1, 2017, the "FRANK BACON" video was accessible by clicking the following link: <https://www.youtube.com/watch?v=-JqDBOusiF8&feature=youtu.be>. At 2:38 of the video, Goodman states "Let's assume for a moment he's a con man or a hypothetical

situation in which he may be a con man, claiming to be an ex-CIA agent is sort of the perfect con.” At 10:21, Goodman admits that he personally contacted the Coast Guard and represented that he had “intelligence” coupled with Government reports that a “dirty bomb” was on board the Maersk Memphis, and he “instructed” the Coast Guard to inspect the ship. At 19:25, Goodman calls Robert a “loser”.

- On June 29, 2017, Goodman and Negron published a video on YouTube entitled, “Squidward v. Sponge Bob”. As of September 1, 2017, the video was accessible by clicking: <https://www.youtube.com/watch?v=Z0Jqux7GQII&feature=youtu.be>. At 19:10 of the video, Goodman states “What Google helped him do was to file privacy complaints [Goodman indicating quote/unquote “privacy complaints” on video] for videos that we have that include evidence of Robert David Steele committing fraud, and he’ll now make a privacy complaint about this, but to say that is like saying Google helped me to search for something. The entire corporation helped me when I typed in is Robert David Steele a lying moron? and the answer came back yes.” At 27:37, Goodman states “I will say the Robber David who steals has already put a privacy complaint on that video.” At 27:58, Goodman states “if you’re going to appear on there [the Alex Jones show, *Infowars*] ...and you are going to claim to be nominated for a Nobel Peace Prize even though you are doing the nominating yourself or having some friend of yours do the nominating. Incidentally, I hope that the members of the Crowdsourcing community will nominate Mr. George Webb Sweigert, Patricia Negron, and myself, Jason Goodman, for Nobel Peace Prizes not because I think we deserve it because I want to show what a fraudster this individual is.”

- On June 29, 2017 at 4:34 p.m., Goodman republished the “Squidward v. Sponge Bob” YouTube video by tweeting the video to his Twitter followers.

- In the YouTube video “Squidward v. Sponge Bob”, Goodman and Negrón refer to a video interview conducted by Goodman in which Goodman talks to a caricature “Squidward Tentacles”. “Squidward Tentacles” is a character that appears in the animated television show, “Spongebob Squarepants”. As of September 1, 2017, the video interview may be accessed by clicking: <https://streamable.com/zf4v1>. The voice of “Squidward” is altered and anonymous. “Squidward” states “this gentleman [Robert] came on your show and he deceived 10,000 people to donate \$15,000 ... he committed interstate wire fraud”. Goodman replies, “I’ve suspected that from the beginning, yes ... I think he’s deceived Dr. McKinney as well”.

- On or about July 1, 2017, Goodman published the following statement on WatchTV [See <https://watchyt.com/videos/robert-david-steele?v=hMJ0AO5OZY8>]: “We have officially withdrawn our endorsement of Robert David Steele and his organization due to his disingenuous behavior and numerous complaints from the Crowdsourcing community.”

- Goodman and Negrón also employed agents to “crowdstalk” Robert and UNRIG. Goodman and Negrón would learn that Robert was going to be interviewed or was giving an interview. Goodman and Negrón would send agents (trolls) to post nasty comments about Robert during the interviews. There were many instances of this happening, including statements made about Robert during a July 11, 2017 interview with Project Camelot, which interview is published on YouTube. [https://www.youtube.com/watch?v=VwHY_fZv5HI&feature=youtu.be]. During this

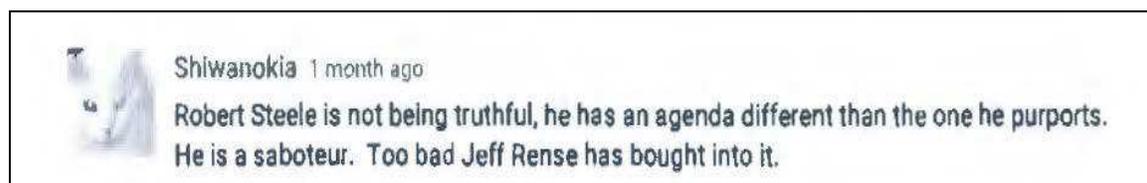
interview, the following comments were made about Robert by a person who identified themselves as “Patrick McClellan”:

“I think Steele is a scam artist and a cabal whore. Ask him why he stabbed George Webb in the back. He did a classic hit job on them. Cozied up to them real nice, had them raise several thousand dollars for his little email scam, and then acted like they were dangerous fugitives. These kind of cowardly weasels are the perfect type that the cabal use to make themselves and by association those he ‘interviews.’ Kerry, I care about you and I don't want you getting roped by these turds, especially when I know your heart is sincere and vulnerable to naivety. I saw that poor kid Jordan Sheridan got hoodwinked too. This guy is pure toxic.”

The “Hound of Time” made the following statements about Robert:

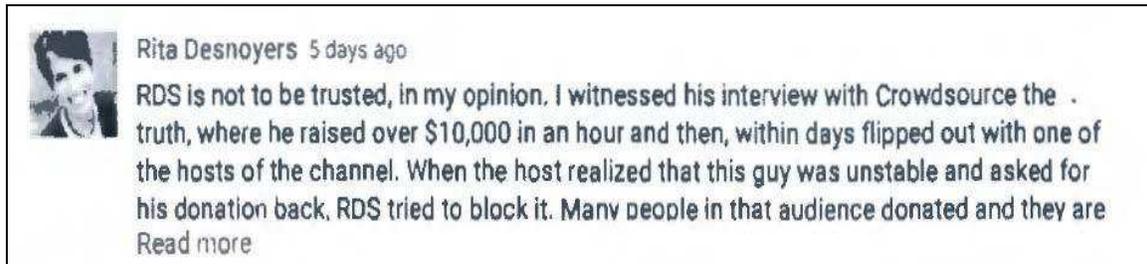
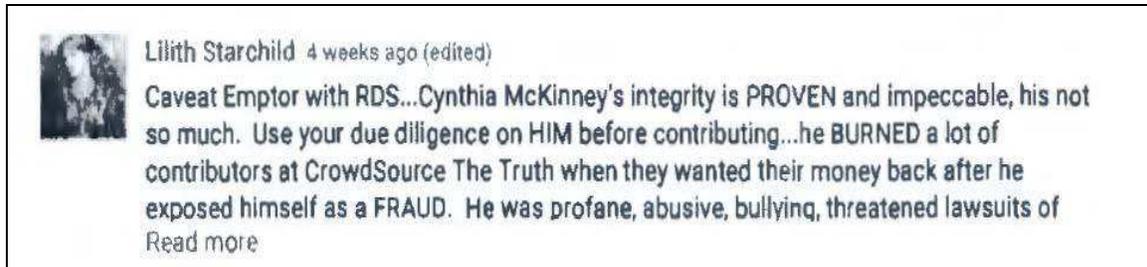
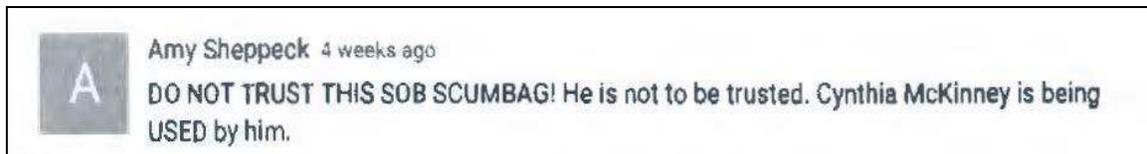
“This guy is a complete psychopath, why is that people don't see it? He has all the traits, the discourse, the mirroring and appropriation of his victims (and others) reasoning, the stalking, etc. He is a case study in the art of deceit. I understand Camelot is a great platform to study the snake oil salesman, the copy cat narratives for a buck, the Wikipedia copy/paste books for sale and so on. With the (very obvious) exception of genuine researchers, it's looking more than ever a psy-op hangout.”

As another example of the attacks upon Robert, vicious public comments and statements about Robert were posted by Goodman and Negrón's agents during Robert's interview with Jeff Rense on July 20, 2017. The comments may be accessed by clicking: https://www.youtube.com/watch?v=o_YRbkzqfik. The comments include the following:



Further egregious public comments and statements about Robert were posted by Goodman and Negrón's agents during Robert's interview with Claudia of *Cabin Talk* on August 2, 2017. The public comments may be accessed by clicking:

<https://www.youtube.com/watch?v=bhPVHAlbm24&feature=youtu.be>. The comments include the following:



- Goodman, Negron and Queen Tut’s videos reached thousands, perhaps hundreds of thousands, of YouTube subscribers, who republished the statements over and over and over again between June 15, 2017 and September 1, 2017. Goodman, Negron and Queen Tut’s efforts to destroy Robert’s reputation and injure UNRIG were intentional, planned and systematically executed across all social media.

- Goodman also employed agents to communicate on his behalf directly with Robert via email. One such agent is a person “Ralph O. Davis” (“Davis”) from Richmond, Virginia. Davis emailed Robert on multiple occasions in June, July and August 2017. On July 3, 2017, Davis emailed Robert as follows:

“Robert, I thought there might be an outside chance that you’re a big enough person to willingly reconcile w/Jason for reasons beyond your still inexplicably vehement derision of him based on your stated subjective 'suspicion' of his supposed Mossad affiliation. Sadly, I apparently misjudged you. There's no independent or verifiable support for that view yet you cling to it as matter of fact. It’s wholly irrational, ..or you have a covert agenda to disrupt for personal or professional motives.

Since you’re unwilling to even acknowledge your provocative role in primary responsibility of this petty distraction, I have no further expectation of its satisfactory resolution and can’t in good conscience support someone so compromised by exercise of unstated agenda. I therefore reiterate my request for refund of my \$100 contribution. It was based on presented sensibilities that you now appear to disingenuously manufacture when seeking to appeal, then conveniently discard when your personal agenda overrides any sense of obligatory responsibility to principles you alleged to champion. In doing so you contradict what you purport to represent as ostensible reformer of malfeasance. It’s very disappointing and troubling considering the rarity of people actually aware, awake and moved to the necessity of reestablishing standards of morally responsible behaviors where that matters most.

You now appear to willfully represent something cynical and hypocritical to any higher purpose and by doing so misrepresented yourself and your intent in your violent about face after the interview with George Webb for what’s clear now as no real reason.

You've willfully defrauded. Please process the refund asap.”

On July 14, 2017, Davis emailed the following:

“Good morning, Robert. How in hell are you? It’s certainly where we are if only in its better suburbs, eh? The degree of mayhem presently building is truly mind boggling, and you certainly seem tainted by one of its many afflictions, so sorry to say.

As I responded in the below to one of your bedfellows who used the same tactics to vilify those you, too, betrayed so willfully, if more personally, I noted that for every such Tom, unfortunately, there’s a Robert as well. Not good of you, my friend. Not honest, ethical or intelligent in true sense. Deceit and betrayal never goes out of style for those with corrupt agenda. So, Robert, how, in hell as it were, do you restore to government what you do not possess in the first place?

...

Do the right thing, Robert. Refund what you took through fraud.”

Just as Goodman, Negron and Queen Tut's videos got nastier and more malicious over time, so did Davis' emails. On July 28, 2017, Davis sent Robert the following email:

Hey, Robert! How goes life of fraudulent crime in total political pretense, my fakey friend? It can't make anyone proud, can it? You have kids, don't you? So, does Cynthia have any suspicion that she's hooked-up with a smiley, shady character who's setting her up for a fall? Life must get complicated when blow-back ensues, as it inevitably does. While you do talk a good line, I must admit, it's one that self exposes the inevitable contradictions that you just can't dance around for long. Is it ever embarrassing that your nasty little smear attempt only damaged your own cover? Too bad for Cynthia, good lady she apparently is, to have found herself in the grip of a pro-co-intel charlatan handler.

Anyway, still time to redeem yourself if you fess-up, do compensation and beg your many victims for forgiveness, you old fraud. George and Jason continue to gain deserved traction with Awan's arrest and the avalanche of evidence now finding light of day that can't be suppressed as you and yours must have hoped. But, you, too, will find yourself exposed, Robert. Sad day that, eh? It will feel like sitting on top of a pile of depleted uranium that you've attempted to obscure.

Why not get started first with a public apology to Jason, George, Trish and Cynthia, then refunding all those you've pretentiously defrauded? Imagine the sense of freedom from convoluted fiction! As difficult as it is for you, do the right thing."

On August 9, 2017, Davis emailed Robert as follows:

"Well, Robert, I understand how time consuming it must be trying to persuade an unsuspecting audience that you're; 'Authentic, Inclusive, and Truthful', (AIn'T) ..when it just ain't so. What tangled web, eh, my contradictory snake-oil friend?

Maybe Alienate, Incite and Trouble would be more apropos to your agenda? So, has Cynthia caught on yet to your set-up for her fail? It's just a matter of time unless you make amends to those you've already betrayed. So, to that end, please send the refund that you solicited on false pretenses at your earliest opportunity.

You may be aware that all of your recorded slanderous assertions regarding George and Jason are now coming back to haunt your laughably pretentious themed bus tour. Seriously, better think harder about reconciliation over law suits.

Reality's gonna bite you when you can least afford it. Be smart. There's time. Atone today."

- On August 7, 2017, Goodman, Negron and Queen Tut published a video on YouTube entitled, “Queen Tut 003”. As of September 1, 2017, the video may be accessed by clicking: <https://www.youtube.com/watch?v=l-wxMiqpc3k>. Robert was notified of the video by Carrie Lavender. At 10:42 of the video, Goodman claims to have been contacted by a “secretive group”. Goodman bleeped out the name of the “secretive group”. At 11:02, Goodman states to Queen Tut that “they were very interested in communicating with you [Queen Tut] about your research into the activities of our friend Robert David Steele.” At 11:18, Goodman stated that “they want to basically [bleep] Robert David Steele, [bleep] and they felt that you had presented good information that might lead them in that direction, specifically with regard to your communications with Rand Paul’s office and Robert David Steele’s misrepresentation that he was having them draft a bill for him, and the fact that he had raised money under that representation that that was happening.” Queen Tut replied, “I’ve got all the emails, Jason, I’ve got it all.” At 12:08, Goodman states to Queen Tut “I want to put you in touch with them ... I’ve only spoken to them for a limited amount ... I find it really difficult to believe that he was ever in the CIA because he just seems so fucking stupid ... he’s engaged in an operation to compromise Cynthia McKinney and basically co-opt her credibility and ... destroy her reputation.”

- On August 8, 2017, Goodman and Negron posted a video on YouTube entitled, “Live from John Glenn Airport”. As of September 1, 2017, the video may be accessed by clicking: <https://www.youtube.com/watch?v=7xuaSo1iufl&feature=em-lss>. Robert received a link to the video via email from a follower of UNRIG. The email

states, "I thought u mite like to know that in this video Jason says he needs to tell Cynthia about what's really going on in the unrig campaign ??? He will not stop!"

- On August 9, 2017, Goodman agent, a person operating under the pseudonym, "AmericanEveryman", posted a video on YouTube entitled, "'Enough about Your Problems with Rabid Zionists Richie. I need some MONEY!' Robert David Steele". As of September 1, 2017, the video may be accessed by clicking: <https://www.youtube.com/watch?v=BZKvvrZQ5BQ&feature=youtu.be>. The following words are posted on YouTube together with the video: "I am so sick of snake oil salesman Robert David Steele but he keeps showing up on all these alternative left-leaning news programs and not a damn one of these interviewers actually interviews the fucker. They're infomercials for the prick and his #UNRIG scam. It makes me sick."

- On August 11, 2017, Goodman published the following email to Dr. McKinney:

"From: Jason Goodman <truth@crowdsourcethetruth.org
Subject: Your association with Robert David Steele

Dr. McKinney,

Both myself and George Webb have made several attempts to contact you, but have not received a direct response. I hold you in very high regard and I am slightly confounded by your decision to align with Robert David Steele. In my estimation he has repeatedly made ignorant and even racist comments, has defrauded my audience of money, has personally and publicly insulted me and is actively attempting to co-opt your credibility to raise funds. I would really appreciate it if you would agree to an interview via Skype to address these concerns. Many people in our audience have concerns about your association with RDS given his ongoing abusive behaviors documented in a number of videos. Thank you for your consideration, I await your response."

- On August 11, 2017, Queen Tut entered an educational chat room managed by Dr. McKinney, using the pseudonym "Pat". Queen Tut posted the following question and comments:

"Guest Pat

00:50AM

Cynthia: Is it true that your student loans are being paid off from UNRIG funds? RDS states this on his website.

Dr. McKinney replied to Queen Tut as follows:

Cynthia McKinney

04:03AM

Hi Pat, you must've missed Robert's very public statement that donated IndieGoGo funds go solely for #UNRIG operational costs. Robert David Steele has stated this policy publicly, which I wholly endorse.

Dr. McKinney further stated to Queen Tut:

Cynthia McKinney

04:22AM

I invite you, as with all others, to visit <http://www.allthingscynthiamckinney.com/unrig/> and read the concept, mission, and vision statements and then to join with us at #UNRIG to make our vision a reality. I think it's about time that we as the people of the US were able to rise above the divide and conquer strategy that has worked so well for so long and come together to unrig our very unfair, rigged system that allows certain individuals inside it to literally kill innocent people at home and abroad with impunity."

- On August 13, 2017, Goodman, Negron and Queen Tut published a video on YouTube entitled, "Queen Tut 005 - Damning Evidence of Fraud in the #Unrig Campaign". As of September 1, 2017, the video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=ZhbelyhnVk&feature=youtu.be>. A description of the contents of the video states, "Queen Tut is back with a vengeance as

she rains hellfire down on Robert David Steele's fraudulent activities with regard to the #Unrig campaign. We invite Dr. McKinney to come forward and explain her continued affiliation." The video refers to emails and document exchanges between Goodman and Queen Tut. At 1:27 of the video, Goodman states "I really want Trish and you and I to really collaborate on this going forward". At 2:39, Negron states "You know Queen Tut, I had seen an interview on Infowars when they were talking about the UNRIG came and just all the body language coming from RDS was just deeply disturbing to me and suggested, you know, a lot of maybe ulterior motives". At 3:25, Queen Tut states "There's a theme here that I see going on ... I introduced the first idea, Jason and I did in June, about this scam, the UNRIG scam". At 5:04, Queen Tut states that there is a "dynamic that's coming off of Robert David Steele [in interviews with females] which I consider to be abusive". At 5:08, Negron states that Robert is "predatory in nature". At 6:10, Queen Tut states "I just want to make the statement that it is my assessment that Robert David Steele and Cynthia McKinney have a pay-to-play operation going on". At 14:42, Queen Tut states "the UNRIG scam. It's a total scam ... That's what it needs to be called because that's what it is." At 14:52, Goodman states that the objective of the UNRIG campaign is to "get money" for Robert. At 15:06, Queen Tut states that "absolutely ... the bottom line is money for Robert David Steele." At 16:18, Negron states that the CIA "probably told Robert he could keep whatever money he raised", which Goodman comments, "exactly, exactly". At 18:18, Queen Tut states "Cynthia McKinney knows that RDS is soliciting donations in her name to pay off her student loans, taxes, and to provide some type of compensation." At 18:48, Queen Tut calls Robert "the creator of the UNRIG scam". At 24:59, Queen Tut states "Robert David

Steele is the architect of all the scam and has promoted and stated many, many lies, constantly. He consistently lies”.

- To date, the Queen Tut 005 video has received over 10,250 views. Reaction to it by those who watched was instantaneous. On August 14, 2017, Robert received an email about the video that reads: “I support #Unrig and hold you both in High Regard - WTF is this about?”. Even long-term supporters of Robert and UNRIG were impacted by the Queen Tut 005 video. One such supporter emailed Robert as follows:

“Robert,

This video <https://www.youtube.com/watch?v=ZhbelyhnVk> is causing us some problems at VL. I am getting numerous emails, pms and comments about it asking me to rethink my support for #UNRIG.

Yes, many are Goodman shills but a few are genuine long time subs of mine. With that said, I need to address this asap to nip it in the bud. If you want to address it with an update video, that would be great, if not, I can do it.

Bottom line is that I need to be able to report with confidence that the allegations in the Goodman video are without merit.”

Another person reported to Robert that:

“I finally listened to the new Queen Tut video. Jeez! When I thought they couldn’t go any lower! Trish Negron says defamatory things about you, e.g calls you a predator. All three defame Cynthia a lot too.”

- On August 17, 2017, Goodman, Negron and Queen Tut published a video on YouTube entitled, “Parallels to Soros: Micro to Macro”. As of September 1, 2017, the video may be accessed by clicking the following hyperlink: <https://www.youtube.com/watch?v=A6lRmZOOBAs>. Despite its title, the video is about Robert and UNRIG. Goodman, Negron and Queen Tut are accompanied on camera by Scott Creighton (“Creighton”), who operates the YouTube Channel, AmericanEveryman. The video repeats and republishes the same false and libelous allegations about

“deception” and other wrongdoing by Robert. Creighton states that Robert is “shady”. He repeats multiple times that Robert is a “snake oil salesman”. Creighton repeats and republished false and defamatory statements about Robert similar to those published in his July 23, 2017 YouTube video entitled, “What is Cynthia McKinney Doing with Robert Steele in this #UNRIG Thing”. Referring to Robert, Creighton writes “What the hell is Cynthia doing teaming up with this disinfo asset?” As of September 1, 2017, the Creighton video may be accessed by clicking the following link: <https://www.youtube.com/watch?v=06K6h-Zs6g4>. At 24:26 of the “Parallel to Soros” video, Queen Tut states that “this kind of person [referring to Robert] is a danger to the alternative news community and he has been operating for way to long ... We want him to be gone now”. At 29:24, Queen Tut states that Robert’s interviews reveal his “schizoid and abusive behavior.” At 40:14, Goodman, Negron and Queen Tut laugh derisively about Robert. Queen Tut repeats and republishes many of the statements made in prior videos, including Queen Tut 005.

- On August 26, 2017, Goodman, Negron and Queen Tut published a video on YouTube entitled, “Unrig Cynthia McKinney”. As of September 1, 2017, the video may be accessed by clicking: https://www.youtube.com/watch?v=tSI0ZfIsN_k. At 8:53 of the video, Goodman states “it’s keeps getting stronger and stronger the evidence of fraud”. Beginning at 9:05, Queen Tut states “what we started in June, where I was able to present evidence about the Electoral Reform Act of 2017 being a scam that he had been perpetuating for a number of years ... That the whole Electoral Reform Act is not an act ... it’s a scam.” At 10:09, Queen Tut states “The Electoral Reform Act, once again, it’s not an Act. It’s a scam”. At 10:30, Queen Tut states “It’s fascinating to see that this

UNRIG scam is continuing um no matter how much exposure we've given about this fraud that RDS feels completely confident going forward with this scam and Cynthia McKinney with him." At 15:41, Goodman states "Now I want to clarify something because we're not doing this to be vindictive, we're not doing this because we dislike Robert David Steele, although I personally do. We're doing this because [laughter] ... [Goodman changes the subject]". At 16:53, Goodman states "Robert David Steele's behavior represents the exact same type of fraud that sucks out money from the population. He's lying. He's, you know, representing that he's going to do this Election Reform Act, but as Queen Tut has pointed out, there's evidence that he has made no effort to do that and in fact has misrepresented efforts that he has claims to have made, which he clearly has not." At 17:42, Goodman states "So this is what we're doing to sort of take some power away from Robert David Steele and disallow him from cheating people like this." At 19:06, Queen Tut states "And this is the nail in the coffin for Robert David Steele's platform for being the Open Source guy. He is not the open source guy, he never has been ... He's created a scam for many many years and he's been defrauding people for a very long time." At 20:47, Goodman states "It's another example of someone co-opting the credibility, Robert David Steele co-opting the credibility of Cynthia McKinney who is someone a lot of people trust." At 21:08, Goodman states "I've been super disappointed that we keep reaching out to her (McKinney), we keep reaching out to her, and she's not directly responding to say why are you involved with this guy". At 21:32, Negron states "No, he's a serious con man, but I mean the bigger point being, you know that this is a serious fraud. I mean that it is a fraud. No question." At 22:50, Queen Tut states "Everybody out there you need to email people or Twitter

people and tell them Robert David Steele is over, his whole platform is over because General Kernan has stated so.” At 23:44, Goodman states “He’s one little brick in that in that huge gigantic wall, and if we could take out the bad bricks one by one, maybe the wall will collapse.” At 24:46, Goodman states “So if someone like Robert David Steele can infiltrate that community be perpetuating the same kind of false narrative and permeate what we all perceive as real news from honest independent journalists that could very well be his purpose, we don’t know, but that’s what we are trying to expose.” At 26:36, Queen Tut states “Robert David Steele and UNRIG are trying to raise money, as much money as they possibly can to fund their little scam.” At 27:35, Queen Tut states “She [Cynthia McKinney] is still part of that fraud”. At 27:57, Queen Tut states “See these scams continue.” At 28:05, Queen Tut states “Cynthia McKinny is also a fraud too. [Goodman interjects “oh”]. She is willing to associate with Robert David Steele”. At 30:05, Goodman states “This is Queen Tut talking about the uh fraud that is UNRIG and what we have just heard from the Queen is that Cynthia McKinney by remaining complicit in this fraud is herself.” At 35:48, Queen Tut states “Why would she continue to associate herself with somebody who has been proven to be a fraud by a retired Army General.” At 36:48, Negron states “Which would explain her being susceptible to this fraud by Robert David Steele”. At 39:41, Queen Tut states “I believe that she [Cynthia McKinney] is a pro-Islamic Brotherhood sympathizer”. At 39:55, Queen Tut states “I believe that she is possibly um compromised, not by just Robert David Steele but by other parties that are foreign actors. Foreign nations.” At 42:03, Queen Tut states “and she’s only getting trips here to the US based on these fraudulent donations to this fraudulent UNRIG scam, and she knows its fraudulent.” At 43:36,

Queen Tut states “Everybody can go look at the UNRIG.net. We suggest you do it. We suggest you look at Robert David Steele’s UNRIG information. Look at all of it. We want everyone to do that, so you can see their whole drive is to get their hands on these corrupt Congressman and have them do this pledge”. At 45:12, Queen Tut states “I feel that she’s [Cynthia McKinney] un-American”.

- On or about August 26, 2017, Queen Tut falsely stated on *Trello.com* that Robert did not author the NATO Open Source Intelligence Handbook. In truth, he wrote eighty-five percent (85%) of the Handbook. As of September 1, 2017, Queen Tut’s *Trello* posts may be accessed by clicking the following hyperlink: <https://trello.com/b/aJuIdUqb/robert-david-steeles-claim-that-he-authored-the-nato-open-source-intelligence-handbook-is-refuted-by-general-kernan>.

- On August 30, 2017, Goodman and Queen Tut published a video on YouTube entitled, “Je Suis Queen Tut - Is Robert David Steele Running an Op Against George Webb & CSTT?”. As of September 1, 2017, the video may be accessed by clicking: <https://www.youtube.com/watch?v=vIfBVDtCNlg>. Goodman describes the video as follows: “In a The mighty Queen continues to call out the Robber David who Steals on his potentially fraudulent activities”. The latest Goodman and Queen Tut video features a photograph of Robert and Dr. McKinney with a circle and a line through the photo. The video republishes, directly and by implication, some of the same statements about Robert and #UNRIG as were published in prior videos.

18. In addition to the direct statements made by Goodman, Negron and Queen Tut in the online YouTube videos, Goodman and his agents posted comments to videos that contained the same hurtful words about Robert that Goodman, Negron and Queen Tut used in the videos.

19. Goodman, Negron and Queen Tut's false and defamatory statements have devastated Robert and have crippled the business of the Earth Intelligence Network. Robert's honor has been stolen. His character and reputation have been impugned, publicly and widely, across YouTube. He has been attacked and discredited on every YouTube channel, where he was once popular, to the point that most hosts are not inviting Robert back. Those hosts that know Robert well have been forced to delete and ban hundreds of disparaging remarks by Goodman, Negron, Queen Tut and their agents and followers, or turn off comments altogether, which has hurt Robert and various communities that valued how Robert would engage within the comments section after each interview, often answering questions and providing links where the interested party could learn more. At a financial level, Robert and Earth Intelligence Network have been forced to refund donations based upon false claims of fraud and, whereas, the #UNRIG campaign was at one point raising \$1,000 to \$2,000 a day in donations for its business, those donations, because of the Defendants' defamation, are down around \$50 a day.

COUNT I – DEFAMATION *PER SE*

20. Plaintiffs restate paragraphs 1 through 19 of this Complaint and incorporate them herein by reference.

21. Goodman, Negron and Queen Tut made and published to third-parties, including CSTT YouTube subscribers and Goodman's followers on Twitter, numerous

false factual statements, which are detailed verbatim above, of or concerning Robert and #UNRIG.

22. By publishing the YouTube video on the internet and by soliciting comments, Goodman, Negron and Queen Tut knew or should have known that their defamatory statements would be republished over and over by third-parties to Robert and #UNRIG's detriment. Republication by both identified subscribers and anonymous persons was the natural and probable consequence of Goodman, Negron and Queen Tut's actions and was actually and/or presumptively authorized Goodman, Negron and Queen Tut. In addition to the original publications, Goodman, Negron and Queen Tut are liable for the republication of the false and defamatory statements by third-parties under the doctrine announced in *Weaver v. Home Beneficial Co.*, 199 Va. 196, 200, 98 S.E.2d 687 (1957) ("where the words declared on are slanderous per se their repetition by others is the natural and probable result of the original slander.").

23. Goodman, Negron and Queen Tut's false statements constitute defamation *per se*. The statements accuse and impute to Robert the commission of numerous crimes involving moral turpitude and for which Robert may be punished and imprisoned in a state or federal institution. The statements impute to Robert an unfitness to perform the duties of an office or employment for profit, or the want of integrity in the discharge of the duties of such office or employment. Goodman, Negron and Queen Tut statements also prejudice Robert and #UNRIG in their profession or trade.

24. Goodman, Negron and Queen Tut's false statements have permanently and irreparably harmed Robert and #UNRIG and their reputations.

25. Goodman, Negron and Queen Tut acted with actual malice and reckless disregard for the truth for the following reasons:

a. Goodman, Negron and Queen Tut intentionally set out to promote a predetermined agenda, which was to destroy Robert's reputation with falsehoods. The YouTube videos were published in retaliation and reprisal for Robert's decision, following the dirty bomb hoax, to have nothing to do with Goodman or CSTT.

b. Goodman, Negron and Queen Tut's statements were knowingly false, with not a shred of supporting evidence.

c. Goodman, Negron and Queen Tut chose to manufacture and publish false and scandalous statements and use unnecessarily strong and violent language, disproportionate to the occasion.

d. Goodman, Negron and Queen Tut did not act in good faith because, in the total absence of evidence, they could not have had an honest belief in the truth of their statements about Robert.

e. Goodman, Negron and Queen Tut reiterated, repeated and continue to republish their false defamatory statements, and enticed others to do so, out of a desire to hurt Robert and UNRIG and to permanently stigmatize Robert and #UNRIG.

26. YouTube, Google and Morphonios lacked reasonable grounds for any belief in the truth of their statements, and acted negligently in failing to determine the true facts.

27. As a direct result of Goodman, Negron and Queen Tut's defamation, Robert and Earth Intelligence Network suffered substantial damage and loss, including, but not limited to, pain and suffering, emotional distress and trauma, insult, anguish,

stress and anxiety, public ridicule, humiliation, embarrassment, indignity, permanent damage and injury to his reputation, attorney's fees, costs, and other out-of-pocket expenses in an amount to be determined by the Jury, but not less than \$5,000,000.00.

COUNT II – INSULTING WORDS

28. Plaintiffs restate paragraphs 1 through 27 of this Complaint and incorporate them herein by reference.

29. Goodman, Negron and Queen Tut's insulting words, in the context and under the circumstances in which they were written and used, tend to violence and breach of the peace. Like any reasonable person, Robert was humiliated, disgusted, angered and provoked to violence by the insulting words.

30. Goodman, Negron and Queen Tut's false and slanderous words are fighting words, which are actionable under § 8.01-45 of the Virginia Code (1950), as amended.

31. As a direct result of Goodman, Negron and Queen Tut's insulting words, Robert and Earth Intelligence Network suffered damage and loss, including, but not limited to, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, permanent damage and injury to reputation, attorney's fees, costs, and other out-of-pocket expenses in an amount to be determined by the Jury, but not less than \$5,000,000.00.

COUNT III– BUSINESS CONSPIRACY

32. Plaintiffs restate paragraphs 1 through 31 of this Complaint and incorporate them herein by reference.

33. Beginning in June 2017 and continuing through the present, Goodman, Negron and Queen Tut combined, associated, agreed or acted in concert together and with others, including Creighton, for the express purpose of injuring the Earth Intelligence Network and #UNRIG in its business and reputation through the publication and republication of false and defamatory statements. In furtherance of the conspiracy and preconceived joint plan, Goodman, Negron and Queen Tut orchestrated a scheme the unlawful purpose of which was to defame Robert and #UNRIG and destroy their reputations and business. Acting in concert, Goodman, Negron and Queen Tut utilized the Internet and various social media properties, including other YouTube channel members, to publish, republish and spread the defamation and character assassination.

34. Goodman, Negron and Queen Tut acted intentionally, purposefully, without lawful justification, and with the express knowledge that they were injuring the #UNRIG campaign and Earth Intelligence Network.

35. Goodman, Negron and Queen Tut's actions constitute a business conspiracy in violation of § 18.2-499 of the Virginia Code (1950), as amended.

36. As a direct result of Goodman, Negron and Queen Tut's misconduct, the Earth Intelligence Network suffered damage and loss, including, but not limited to, injury to its business, property loss, injury to its trade and professional reputation, attorney's fees, court costs, and other damages in an amount to be determined by the Jury, but not less than \$5,000,000.00.

37. In accordance with § 18.2-500 of the Virginia Code, Earth Intelligence Network seeks three-fold the damages by it sustained in a sum to be determined by the Jury, but not less than \$15,000,000.00.

COUNT IV – COMMON LAW CONSPIRACY

38. Plaintiffs restate paragraphs 1 through 37 of this Complaint and incorporates them herein by reference.

39. Goodman, Negrón and Queen Tut's actions, detailed above, constitute a conspiracy at common law.

40. As a direct result of Goodman, Negrón and Queen Tut's willful misconduct, Robert and Earth Intelligence Network suffered damage and loss, including, but not limited to, injury to business, property loss, injury to professional and personal reputation, pain and suffering, insult, humiliation and embarrassment, attorney's fees, court costs, and other damages in an amount to be determined by the Jury, but not less than \$5,000,000.00.

COUNT V – TORTIOUS INTERFERENCE

41. Plaintiffs restate paragraphs 1 through 40 of this Complaint, and incorporate them herein by reference.

42. Earth Intelligence Network had a valid and reasonable contracts and business expectancy in its relationships with donors.

43. Goodman, Negrón and Queen Tut knew about Earth Intelligence Network's business expectancies. Some of the donations were made by subscribers to CSTT.

44. Goodman, Negrón and Queen Tut intentionally interfered with Earth Intelligence Network's property rights and business expectancies by, *inter alia*, devising, aiding, abetting and actively participating in the scheme to defame and injure Robert and the UNRIG campaign, by intentionally lying in the YouTube videos and fabricating

evidence about Robert, UNRIG and Dr. McKinney, and by encouraging donors to report “fraud” on the part of Robert and/or #UNRIG. Goodman, Negron and Queen Tut’s improper methods, actions and practices were, *inter alia*, defamatory, unethical, oppressive, over-reaching, fraudulent, hostile, and sharp.

45. As a direct result of Goodman, Negron and Queen Tut’s tortious interference with Earth Intelligence Network’s contracts and valid business expectations, Tanner has suffered damage and incurred loss, including, without limitation, injury to its property and business, loss of donations, financial loss, damage to reputation, court costs, and other damages in an amount to be determined by the Jury, but not less than \$1,000,000.

Plaintiffs allege the foregoing based upon personal knowledge, public statements of others, and records in their possession. Plaintiffs believe that substantial additional evidentiary support, which is in the exclusive possession of the Defendants and their agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Plaintiffs reserve the right to amend this Complaint upon discovery of additional instances of Defendants’ defamation and wrongdoing.

CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request the Court to enter Judgment against the Defendants, jointly and severally, as follows:

- A. Compensatory damages in an amount to be determined by the Jury, but not less than \$5,000,000.00;
- B. Three-fold Damages in accordance with § 18.2-500 of the Virginia Code in the total sum of \$15,000,000.00;
- C. Punitive damages in the amount of \$350,000 or the maximum amount allowed by law;
- D. Prejudgment interest at the maximum rate allowed by law from;
- E. Postjudgment interest at the rate of six percent (6%) per annum until paid;
- F. Attorney's Fees and Costs;
- G. Such other relief as is just and proper.

TRIAL BY JURY IS DEMANDED

DATED: September 1, 2017

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