

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

GARY J. BYRNE

RICO FIRST AMENDED COMPLAINT

**THE GJB PROJECT, a/k/a GJB
LLC**

Plaintiffs,

v.

HILLARY RODHAM CLINTON

JOHN PODESTA

DAVID BROCK

PETER STRZOK

**3214 Prince William Drive
Fairfax, Virginia**

and

NUMEROUS NAMED UNKNOWN

Defendants.

JURY TRIAL DEMANDED

“Viva Le Resistance”

Unknown Named Department of Justice Enterprise Defendant

NOW COMES Plaintiffs, Officer Gary Byrne and The GJB Project, for his/their complaint against the above named Defendants, as follows:

Jurisdiction and Venue

1. The Court has original and subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1964 et seq. along with supplemental jurisdiction under 28 U.S.C. § 1331. This Court also has jurisdiction pursuant to 28 U.S.C. § 1332(a) as the matter in controversy exceeds the sum or value of \$75,000 and is between citizens of different states.
2. Venue is proper in this district pursuant to 18 U.S.C. 1965(a) and 28 U.S.C. 1391(b) as this is a district in which Defendants have agents, and in which Defendants transact their affairs. A substantial part of the events giving rise to Plaintiff's claim occurred in this district, including many acts that were part of Defendants' schemes to defraud. 28 U.S.C. 1391(b)(2). Further, there is also venue in this district as pursuant to 18 U.S.C. 1965(b) the ends of justice require that Defendants be brought before this Court for adjudication of Plaintiff's claims.
3. Plaintiffs have standing to bring this action because they have been directly affected and victimized by the unlawful conduct complained of herein. Their injuries are proximately related to the illegal conduct of defendants, who have destroyed them, their business, and individual livelihoods.
4. Venue is proper pursuant to 18 U.S.C. §1965 and 28 U.S.C. §1391(b) in that Defendants either transact significant business here or reside here and are subject to personal jurisdiction in this District. Further, much of the evidence of wrongdoing is located in and directly contiguous to this District, and the pattern of racketeering was and is directed at and committed within the confines

of the District (which is the seat of the United States Government) – where the Enterprise scheme continues.

PLAINTIFFS

5. Plaintiff Gary J. Byrne (“Byrne” or “Officer Byrne”) is a former officer of the United States Secret Service who bore witness to the significant transgressions of President William Jefferson Clinton and Hillary Rodham Clinton, and who has been injured in his business and property by the Defendants, functioning through a civil RICO Enterprise due to his providing truthful testimony and recounting wrongdoing in an equally truthful *New York Times* Number 1 nonfiction bestseller, written by Byrne, entitled “*Crisis of Character: A White House Secret Service Officer Discloses His Firsthand Experience with Hillary, Bill, and How They Operate.*” (“*Crisis of Character*” or “*Crisis*”). Plaintiff The GJB Project is the legal entity by which Officer Byrne conducts his business affairs.

DEFENDANTS/ENTERPRISE MEMBERS

6. Defendant and Enterprise Member David Brock (“Brock”), is and has been the creator of partisan “non-profit” entities which use as a primary tactic that which would otherwise constitute, and in this case constituted, defamation with respect to Byrne and fatal injury to Byrne’s business. In collaboration with his many partisan entities registered with the Internal Revenue Service as “non-profits” and presented as such to his many unknowing (and knowing) donors, Brock has played a role for the RICO Enterprise by and through legal entity Enterprise members American Bridge 21st Century Foundation, American Democracy Legal Fund, American Independent Institute, Citizens for Responsibility and Ethics in Washington (“CREW”), Common Purpose Project, Franklin Education Forum, Franklin Forum, Media Matters, Media Matters Action Network, as well as Political Action Committees (“PACs”), Super PACs, and Party Committees such

as American Bridge 21st Century, Correct the Record, Franklin Forum, Priorities USA Action, American Priorities, and American Priorities 16 Joint Fundraising Committee. Brock is the author of the leaked “Terminate Trump” dossier which is attached hereto as *Exhibit “A.”* Orchestrated by Brock, defendants/Enterprise Members have consistently shown a pattern of such illicit behavior, *e.g.*, their defamatory and false statements, and related wire and mail fraud steadily coordinated by Brock with the resulting devastation of the commercial establishment of analogous victim Peter Schweizer – the author of *Clinton Cash*, which documents illicit donations and myriad predicate acts made to and/or involving the Clinton Foundation correlated to the Enterprise herein and continuing to this day.

7. Enterprise Member Media Matters for America (“Media Matters”) is a highly partisan, not for profit organization, who along with defendant David Brock and *Correct the Record*, was used to disseminate false and defamatory information about Office Byrne knowing that such information had been falsely created or otherwise “ginned up” thereby directly and proximately causing permanent injury to Office Byrne.

8. Defendant and Enterprise member Hillary Rodham Clinton is a former Secretary of State and United States Senator (D-NY), as well as the nominee of the Democratic Party to become the 45th President of the United States, who knowingly and corruptly served as a principal in the Enterprise and directed predicate acts involving obstruction of justice and bribery in order to further the goals of the Enterprise to cause injury to the business and property of Office Byrne, and unduly enrich herself and her family.

9. Non-Defendant Enterprise member George Soros (“Soros”) is a Hungarian-American investor and leftist Democratic Party partisan who has supported the Enterprise in illicitly funneling monies to pay bribes to independent contractors and terminated FBI official Peter Strzok to gin up

false information about Officer Byrne, who was viewed as an enemy of the Clintons – and assist in funding a safehouse in Massachusetts located at 167 Crescent Avenue, North Attleboro utilized by Strzok and Enterprise Members to destabilize Donald J. Trump, Sr. in his bid for the presidency, the destruction and veiling of thousands of illicit Hillary Clinton electronic mail transmissions, and further the Enterprise operational scheme.

10. Defendant and Enterprise Member John Podesta is the former chairman of the 2016 Hillary Clinton presidential campaign and principal who facilitated the payment of bribes to create false sources of information about Officer Byrne and assisted in directing the destruction of documents and, with the collaboration of FBI seniors officials Andrew McCabe, Peter Strzok and James Comey, the veiling of documents which would have shown this illegal conduct.

11. Enterprise Member *Correct the Record* was a Super PAC founded by David Brock and funded by Hillary Clinton and George Soros and used by Brock in publishing “FROM THE DESK OF DAVID BROCK”, which facilitated the payment of bribes to create false information about Officer Byrne. Enterprise member, non-Defendant Jan Gilhooly, at all times relevant to this action, including when he intentionally and illegally defamed Plaintiff Gary Byrne, was the president of a nonprofit. “nonpartisan” organization known as the Association of Former Agents of the United States Secret Service (“AFAUSSS”). Gilhooly has actively and knowingly evaded service of process in this matter.

12. Enterprise member, non-Defendant Jonathan Wackrow is an executive at Teneo, an organization very closely affiliated with the Clintons, The Clinton Foundation, and the Clinton Global Initiative, and their related wrongdoing, as well as a “regular commentator on security and risk management on major news outlets.” Both Gilhooly and Wackrow defamed Officer Byrne and were compensated by Brock and Soros under the table.

13. Defendant and Enterprise Member Peter Strzok is a former FBI high-ranking counterintelligence official who knowingly and corruptly served as a principal in the Enterprise and directed predicate acts involving obstruction of justice and bribery in order to further the goals of the Enterprise to cause injury to the business and property of Officer Byrne; in so doing, Strzok used his official office in collaboration with terminated FBI Director James Comey, terminated FBI Deputy Director Andrew McCabe, along with demoted Department of Justice Official Bruce Ohr - who according to congressional investigative committees accepted bribes from the presidential campaign of Hillary Clinton, through opposition research firm Fusion GPS, in order to assist in the Enterprise dissemination of false and defamatory information about her “opponents”- but also utilized laundered Soros funding to carry out Enterprise operations at 167 Crescent Avenue, North Attleboro, Massachusetts, 02760, in violation, *inter alia*, of the federal Travel Act in conjunction with the campaign lawyer for Hillary Clinton, Perkins Coie LLP, an international law firm, consistently furthering the objectives of the Enterprise from its collaborating offices in the Republic of China with attendant financial institutions in the United States.

14. Numerous defendants remain unknown named, and based upon an increasing number of corroborated informant testimony will be identified and proven to be participants in the vastly expanding criminal Enterprise at issue in this lawsuit.

INTRODUCTION

15. Plaintiff alleges that beginning at a time before 2016 and continuing through at least year 2016, because of the upcoming publication of a book critical of former President William Clinton, Enterprise members, including Defendants Hillary Clinton and John Podesta, engaged in the destruction and “wiping clean” of inculpatory documents (e-mails) from Clinton’s private unsecured computer system which would have shown, among other things, that they had paid bribes to independent contractors to create false information about Plaintiff Officer Byrne, and had illegally caused the government to conduct illegal domestic surveillance of Officer Byrne, all in violation of 18 U.S.C. section 1512(c)(1), which is RICO predicate activity.

16. Moreover, Defendant David Brock and Enterprise members he controlled, the “nonpartisan” non-profits, such as *Correct the Record*, knowing that the information was false and received as a result of bribes paid to independent contractors, used facilities in interstate commerce (such as internet outlets and other media outlets) to disseminate this false information which thereby promoted and facilitated the unlawful activity, *i.e.*, bribery in violation of states to be determined, including the District of Columbia, all in violation of 18 U.S.C. section 1952(a)(3), which is RICO predicate activity.¹ Brock utilized the services of Enterprise members Wackrow and Gilhooly to commit the slander and libel, knowing that they were compensated by Brock and Enterprise member George Soros. The Defendants’ payment of bribes are also believed to have been made to public officials as defined in 18 U.S.C. § 201(a)(1), to aid in committing and colluding in any fraud in violation of U.S.C. § 201((b)(1)(B), which is also RICO predicate activity.

17. Plaintiff has standing to bring this action as he incurred injury to his business and as a result of damage to his reputation, which has long been found to be sufficient injury to meet the standing requirement in this district. *See Lewis v. Lhu*, 696 F. Supp. 723, 727 (D.D.C. 1988) (numerous subsequent citations omitted). Plaintiff has also incurred legal fees and expenses as a result of the

¹ D.C. Code section 22-712 provides:

(a) A person commits the offense of bribery if that person:

(1) Corruptly offers, gives, or agrees to give anything of value, directly or indirectly, to a public servant; or

(2) Corruptly solicits, demands, accepts, or agrees to accept anything of value, directly or indirectly, as a public servant;

in return for an agreement or understanding that an official act of the public servant will be influenced thereby or that the public servant will violate an official duty, or that the public servant will commit, aid in committing, or will collude in or allow any fraud against the District of Columbia.

damage to his reputation caused by the illegal predicate activity of obstruction of justice (destroying inculpatory documents), and the Defendants use of interstate facilities to promote and facilitate their bribery.

FACTUAL ALLEGATIONS

18. Prior to the 2016 presidential election, Byrne wrote a nonfiction book entitled *Crisis of Character: A White House Secret Service Officer Discloses His Firsthand Experience with Hillary, Bill, and How They Operate* (“*Crisis of Character*” or “*Crisis*”), which recounted, among other things, Byrne’s direct observations as a United States Secret Service Officer in *constant close proximity* to then-President William Clinton and (then-First Lady of the United States) Hillary Clinton. These experiences and direct observations included, but were not limited to, numerous and highly-disturbing first-hand reflections of President Clinton and of Hillary Clinton prior to her becoming a United States Senator -including Hillary Clinton physically battering the President of the United States. Byrne’s compelled testimony before a Independent Counsel Kenneth Starr Grand Jury – among the first of its kind – was, due to its faultless veracity and proof of William Clinton’s perjury and obstruction of justice *prior* to the production of the Lewinsky “blue dress” incriminated with President Clinton’s DNA, instrumental in the impeachment of President William Clinton. The Clintons, Brock, Podesta have sworn reprisal ever since, and have sought payback against Byrne—utilizing predicate acts and related defamatory *per se* tactics to destroy Byrne and his business and, with Byrne and other Plaintiffs out of the way, provide a path to a second Clinton presidency.

19. Officer Byrne has been intentionally defamed and fatally injured in his business by defendants Brock, *Correct the Record*, Media Matters, Hillary Clinton and Gilhooly and Wackrow, among others – with support by Enterprise members George Soros, the Clinton Global Enterprise (“CGI”) and Clinton Giustra Enterprise Partnership (“CGEP”) resources,, *e.g.*, Secretary of State

Hillary Clinton Enterprise bribery regarding control of U.S. uranium to Russia in exchange for hundreds of millions of dollars for the Enterprise operational perpetuation and, *inter alia*, American Bridge at the instruction of “Hillary for America” (the presidential campaign of Hillary Clinton).

20. Plaintiff Gary Byrne was deemed a particularized threat to the Enterprise, as he was deemed highly trustworthy and sincere. Proofs of Plaintiff’s book, *Crisis of Character: A White House Secret Service Officer Discloses His Firsthand Experience with Hillary, Bill, and How They Operate*, were being circulated during the Spring of 2016, following earlier widespread discussion as Hillary Clinton rigged the Democratic primary against Vermont Senator Bernard Sanders, and then more formally promoted in early June of 2016 and released in late June of that year. Defendants Hillary Clinton, David Brock, and John Podesta, sought to minimize these disclosures and paid bribes to illicit false and damaging information about Office Byrne. Brock illicitly began defaming Plaintiff Byrne daily utilizing the “nonpartisan” *Correct the Record* **“FROM THE DESK OF DAVID BROCK”** using Enterprise members, Media Matters and *Correct the Record* platforms – with American Bridge and Brock himself openly and admittedly serving as the illicit link to Hillary for America. Wackrow and Gilhooly then appeared on CNN,² both as “expert” panelists paid under the table and on shows such as “Smerconish” and other CNN television hits. Brock and the Enterprise, funding and utilizing knowingly false opposition research, used his nonprofit, “nonpartisan” entities and, in addition, did not report payments to Wackrow, Gilhooly and Gilhooly’s nonprofit entity. The Enterprise defamation continued nonstop throughout the summer of 2016, and thereafter. This false information was conveyed with the intent to destroy the business and livelihood of Plaintiff.

² Cable News Network, or “CNN”, is a self-described “American pay television news channel and subsidiary of AT&T’s WarnerMedia” – and is considered to be aligned closely with the Democratic Party and alleged thereto to espouse the Enterprise described herein.

21. From before year 2016, and continuing through year 2016, Defendants Hillary Clinton and John Podesta, with the assistance of David Brock, bribed independent contractors and government officials to provide sources of false information about Byrne. This inculpatory information resided on Hillary Clinton's personal e-mail system/servers. Then, realizing the inculpatory nature of this information, from before year 2016 and continuing through 2016, Hillary Clinton and John Podesta – with the assistance of Clinton's legal counsel - destroyed large numbers of documents and e-mails, which (with the knowledge and support of Strzok, McCabe and Comey) remain missing to this day. It is known that tens of thousands of e-mails were deleted and "wiped" by Hillary Clinton and her co-conspirators from her illicit servers, *e.g.*, Plaintiff was informed by a FBI Human Confidential Source that significant information about him was/is contained in the illegally deleted Clinton e-mails (obstructing justice in each such e-mail targeting "enemy" Byrne).

22. FBI official Defendant Peter Strzok was the lead investigator of the Hillary Clinton "e-mail scandal" for part of that time (2015-2016), and had knowledge of the destruction of documents but took no action because of his fierce, passionate loyalty to candidate Hillary Clinton and deep bias against Donald Trump, Sr. As noted, other illegal Enterprise activity involved the directing of the FBI to utilize illegal domestic human and electronic surveillance, and tradecraft such as "lures" run at Byrne in order to damage Byrne's credibility. Information that Human Confidential Sources ("HCSs") were illegally used is believed to be also part of the documents destroyed in order to cover up the illegal activity.

23. Utilizing counterintelligence tradecraft, the DoJ-controlled HCS team "ran at" Plaintiff Byrne because they thought he was on the Trump campaign (he was not), that he is Republican (when he simply believed based upon observations that Clinton was unfit to be President) and because they believed Plaintiff presented a "threat" to Hillary Clinton because he knew a great deal about the Clintons. In so doing, the Enterprise attempted

to use Plaintiffs in their scheme to obstruct justice with respect to the Clinton Enterprise private server malfeasance. Plaintiffs were burned not only by tactical Enterprise defamation to deny the truth, but by the Obama/Enterprise counterintelligence apparatus to obstruct justice.

24. It is not difficult to discern what the Enterprise was attempting to do to Plaintiff Gary Byrne. As the FBI HCS teams excel at, they attempted to manipulate Byrne (while they thought he was with the Trump campaign), as HCS Stefan (“Stef”) Halper and his team were dispatched by Enterprise members John Brennan (then CIA Director), James Comey (then FBI Director) and the Enterprise to manipulate *for partisan purposes* any suspected Trump “associate” or Enterprise “enemy.”

25. Officer Byrne was considered an “enemy” of Hillary Clinton and the Enterprise, and was (wrongly) assumed to be working for the Trump campaign. This Honorable Court might also take into account that Byrne was not only an Officer of the United States Secret Service, but an Air Force veteran and a Transportation Security Administration Air Marshal before he and his fellow Plaintiffs were destroyed by the Enterprise.

26. Enterprise principals targeted Plaintiff Byrne with the most robust counterintelligence powers in existence in order to illicit information which they could use to destroy him.

27. Plaintiff Gary Byrne overheard the Enterprise team HCS placing a cell phone call to “Stef” – assumed by Byrne at the time to be a woman. Another witness in this matter will be the wife of George Papadopoulos, who will testify that her husband believed/believes (as does Plaintiff Gary Byrne) that the dangled HCS e-mails were those “missing” from the wiped Hillary Clinton private server.

28. Strzok noted that “*we can’t take the risk*” of Trump being elected or retained in office, and further noted that the FBI needed to undermine Trump (both before and after the 2106 election, if Trump won) as an “insurance policy”, i.e., as a hedge against any possible Trump victory in the 2016 presidential contest. Because of that entrenched bias and position as the lead investigator in the Hillary Clinton investigation, and improper HCS interactions with Ohr, it is reasonably inferred that Strzok was complicit in the destruction of and “wiping” of the inculpatory e-mails.

29. Beyond illicit human intelligence gathering, the Enterprise conducted surreptitious electronic surveillance both before and after misleading the Foreign Intelligence Surveillance Court (“FISC”) – led by District of Columbia federal judge Rosemary Collyer - the Enterprise destroyed tens of thousands of e-mails under subpoena and/or court order (including plans to defame and otherwise undermine Plaintiff Gary Byrne and others, and the overall “game plan” for conducting their operational scheme – all the while running classified information through private unsecure Hillary Clinton servers and delivering classified information to multiple individuals not adequately cleared to receive it.

30. For several months between the summer of calendar year 2016 (when *Crisis* was released) and the November 8th United States’ presidential election, and thereafter, an Enterprise vehicle, *Correct the Record*, under the moniker “**FROM THE DESK OF DAVID BROCK,**” published on its site intentionally published numerous clearly defamatory falsehoods coordinated illegally with the Hillary Clinton for President campaign (“Hillary for America” or “HFA”), with the intent to destroy the business and livelihood of Plaintiffs.

31. Enterprise members, including defendants, individually and collectively and in collusion with *Correct the Record* defamation and obstruction of justice, utilizing false vitriol emanating “**FROM THE DESK OF DAVID BROCK,**” published, among other things and in illegal

coordination with HFA, an extensive series of defamatory statements, represented as fact, directly attacking Plaintiff Gary Byrne and his business interests, *that a substantial and respectable minority – and most likely an overwhelming majority – of the Plaintiff's community would consider defamatory.*

32. Enterprise members, including Defendant Brock, through its vehicle *Correct the Record* and enabling libel “**FROM THE DESK OF DAVID BROCK,**” defamed Plaintiff by referring to *Crisis* as “recycled gossip,” “debunked lies,” and “Trump-esque conspiracy theories”, when in fact *Crisis* was based upon first-hand observation by a United States Secret Service Officer of President William Clinton and Hillary Clinton, recounted under oath, and corroborated by William and Hillary Clinton.

33. Enterprise members, including Defendants Brock and Podesta, colluded in the absolute falsehood that Byrne had “no direct access to the First Family,” thus directly contradicting prior sworn testimony by not only Plaintiff Gary Byrne, but also President William Clinton, defendant Hillary Clinton, Clinton partisan confidante George Stephanopoulos, White House Chief of Staff (to William Clinton) Leon Panetta, and numerous others with direct knowledge (including counsel of record here, David Evan Kendall) - and in particular included the relevant Enterprise defendants’ intentional false statements by wire, through, *inter alia*, *Correct the Record*, and in the process, as intended, obstructed justice with respect to the federal espionage investigation of Hillary Clinton.

34. In addition to the Enterprise’s constant written repetition of slanderous statements about Plaintiff by Gilhooly and Wackrow, on both the website of Media Matters and *Correct the Record*, “**FROM THE DESK OF DAVID BROCK,**” (therein drawing inferences relevant therefrom), and the contradictory evidence shown by testimony of White House principals during the time Plaintiff Gary Byrne was stationed directly outside the Oval Office at position E-6, Media Matters and

Correct the Record libeled Byrne by unambiguously and intentionally misstating that Byrne had not fully told the truth under oath during earlier testimony which led to the impeachment of William Clinton (the 42nd President of the United States) along with the production of the semen-stained blue dress of President Clinton's paramour (and White House intern) soiled with the President's DNA – both of which led to the impeachment of President Clinton - for which the Enterprise has sought reprisal for decades.

35. Gilhooly and Wackrow directly and falsely questioned Plaintiff's veracity and slandered him on a cable television network (*Cable News Network (CNN)*, on numerous occasions, and *The Michael Smerconish Show*), directly stating and otherwise inferring that Plaintiff was a criminal, knowing their statements were untrue and inconsistent with those of, among others, defendants William and Hillary Clinton, and their legal counsel David Evan Kendall – and further obstructing justice with respect to Hillary Clinton's attempts to conceal Enterprise planning to damage Plaintiff Gary Byrne contained in (private Clinton servers) e-mails that had been destroyed while under congressional subpoena and in the context of an FBI investigation, and after being ordered to turn them over by this honorable court.

36. Like Media Matters and *Correct the Record*, Wackrow and Gilhooly were personally served with retraction demands by the undersigned, as well as cease and desist and litigation hold letters - thus subjecting them, like the Enterprise participants, to punitive damages under relevant State pendant defamation statutes, to which they did not respond or comply with at the instructions of the Enterprise.

37. Wackrow's slander (before taking a highly-compensated position with Clinton-controlled Teneo with the assistance of the Enterprise), and that of Gilhooly, as noted, was completely false

yet repeated as fact in *Correct the Record*, “**FROM THE DESK OF DAVID BROCK**”, and direct adverse inferences concerning the defamation of Byrne are drawn thereby.

38. The Enterprise, through the vehicle *Correct the Record* and “**FROM THE DESK OF DAVID BROCK**”, also colluded in claiming that the *New York Times* stated as fact that Byrne’s “juiciest anecdotes [within *Crisis*] are just a rehash of old rumors,” while referring to *Crisis* as “SUMMER FICTION” – again intentionally ignoring that Byrne’s observations were based upon first-hand knowledge/observation previously agreed upon by other participants in the Enterprise, including defendant Hillary Clinton, and numerous others – and thereby obstructing justice in the context of the email investigations noted above.

39. Unreservedly contradicting Brock and his illicit entities’ defamation, as well as the defamation of Gilhooly and Wackrow, the Clintons themselves (William and Hillary) have conceded that Plaintiff Gary Byrne was “the last barrier before anyone saw (President) Bill Clinton;” even easily accessed *You Tube* footage and photographic evidence available with a simple Google search shows Officer Byrne’s fixed position directly adjacent to President William Clinton for many years should have been reviewed (but was not) by Wackrow and Gilhooly prior to defaming Plaintiff on CNN (including issuing “statements” by nonprofit “nonpartisan” AFAUSSS - and by Media Matters and *Correct the Record* before libeling Officer Byrne.

40. Byrne’s claims in *Crisis* were true, making contrary intentional dissembling by the Enterprise, and those they paid/bribed to publish and state utter falsehoods, defamatory and necessitating punitive damages – as well as serving as the foundation for related obstruction of justice predicate offenses.

41. Byrne’s young children and extended family were cruelly made aware of the wholly false publications and statements made about him by defendants (all now paid directly or indirectly by

the Clinton defendants), as were professional colleagues and friends, making the defamation against Byrne and his co-Plaintiffs particularly malicious and thereby subject to punitive damages.

42. The Defendants' falsehoods are directly contradicted by William Clinton's most senior staff prior to, during and following the impeachment of the 42nd President of the United States – as well as directly contradicted by sworn statements of Enterprise defendants William and Hillary Clinton and those among the Clinton coterie who are credible such as then-Chief of Staff Leon Panetta.

43. Despite Plaintiff's unambiguous and immediate written retraction demands to Brock and his defendant entities, including Media Matters, *Correct the Record*, as well as Gilhooly and Wackrow, none of the Enterprise defendants' false and defamatory statements have been retracted or withdrawn in any manner – nor even responded to as they were so obligated.

44. Enterprise Member Gilhooly, among multiple other things and after being paid laundered funds to defame Byrne, claimed falsely that Byrne had an "underlying motive" in writing *Crisis* and that Byrne was not fully truthful before the Starr grand jury – which constitutes slander *per se* and furthers the obstruction of justice intended by the Enterprise.

45. Enterprise Members Gilhooly and Wackrow were paid via laundered funds to defame Officer Byrne, and thus did not pay federal or state taxes thereon, having accepted laundered money to conspire in a scheme against Byrne whose truthful and multiple corroborated testimony before the Starr grand jury led to the impeachment of President William Clinton.

46. Gilhooly concedes that he defamed Byrne by "calling [him] a liar" – yet refused to retract his false defamatory statements regarding Byrne – nor did the nonprofit institution which Gilhooly headed, the Association of Former Agents of the United States Secret Service ("AFAUSSF") retract

despite their ability to evade taxes, which benefited financially from Gilhooly's slanderous appearances on CNN.

47. President William Clinton himself admitted that female mistresses engaged in intimate acts with him for long periods of time (contrary to the short periods of time that William Clinton swore under oath he spent with his lovers who were not his wife) – sometimes while he was conducting official, classified government business – and that Byrne interrupted their trysts as he was obligated to do out of concern for protecting the President.

48. While William Clinton was President, Byrne was compelled by Independent Counsel Starr to truthfully testify, which he did, not only to observing the violent outbursts of Hillary Clinton (against a sitting President), but also to the sexual harassment of the President in having subordinates (like intern Lewinsky) perform repeated and humiliating acts upon President William Clinton in or around the White House Oval Office.

49. The Enterprise Defendants colluded deceptively and in vengeance by referring to Byrne's credibility as "suspect", based upon a wholly false narrative that Byrne "contradicts sworn testimony" – thus further defaming him despite the concessions under oath by President William Clinton – and his subsequent impeachment.

50. The Enterprise also colluded to defame and destroy Byrne, with *Correct the Record*, **FROM THE DESK OF DAVID BROCK** disputing that Hillary Clinton attempted to mame President William Clinton by throwing heavy objects at his head at close range and striking the President in the eye with another heavy object – thus attempting to mame (or possibly kill) the 42nd president of the United States.

51. President William Clinton's Secret Service "detail" was often out of proximity to President Clinton when Hillary Clinton attacked President William Clinton, or when William Clinton

sexually molested younger women subordinates— directly contrary to the intentionally false defamatory statements of Gilhooly and Wackrow while “guests” on CNN, which false defamatory statements were placed on the *Correct the Record* website and described as fact “**FROM THE DESK OF DAVID BROCK**”.

52. The Defendants colluded to again defame Byrne by covering up his recounting of repeated assaults and battering of our then-President reported by Byrne and testified to under oath before a grand jury duly constituted by Independent Counsel Kenneth Starr - any one of which would have resulted in a lengthy prison term for Hillary Clinton (who as “First Lady” enjoyed no privilege for assaulting, battering and/or attempting to maim or kill her husband, the President, or members of the Secret Service, or anyone else).

53. The Defendants claimed, through Brock and *Correct the Record* **FROM THE DESK OF DAVID BROCK**, that Byrne had “ulterior motives” and that Officer Byrne “delved into falsities [many times confirmed] that read like the ‘daydreams of a low-ranking employee’” – these statements by Brock and *Correct the Record* were unambiguously false, utterly defamatory, intended to obstruct justice in light of Hillary Clinton’s espionage violations, and highly damaging to Plaintiffs in their business *because the misconduct achieved its intended purpose such that as planned and intended by Brock when he contacted mainstream media, made false statements and paid off journalists, and thereby caused more than 50 media outlets to cancel any appearance by Officer Byrne, such that Plaintiffs could not promote sale of Crisis nor would any “mainstream” television or radio media outlet allow Byrne to even appear.*

54. What of course the Enterprise collusion fails to acknowledge is that hundreds of Secret Service agents, and Arkansas state troopers prior to that, have helped William Clinton do precisely what Byrne testified that he observed and why others have simply become disgusted and quit.

55. The Enterprise defendants similarly colluded to defame and discredit Byrne when *Correct the Record* claimed Byrne lied, in *Crisis*, about Hillary Clinton assaulting and battering Secret Service officers by throwing heavy objects at their heads in an attempt to injure them in violation of federal law – 23 Secret Service witnesses are available to testify to either witnessing or being struck by Hillary Clinton’s projectiles.

56. In yet another clearly defamatory (and coordinated) Enterprise personal attack, through *Correct the Record*, **FROM THE DESK OF DAVID BROCK**, it was stated that “facts seem to be optional for Gary Byrne” – despite President Clinton being impeached for perjury based upon these exact “optional facts”, to which William Clinton has subsequently admitted.

57. Defendants, through their conduct of the Enterprise, have systematically and continuously, within the past ten years at the very least, conducted along with other Enterprise members a corrupt enterprise in violation of RICO, and such acts are continuing in nature.

58. As a result of the Enterprise defamation, Plaintiff’s business was deeply damaged and sale(s) of his non-fiction *New York Times* (Number 1) best-selling book *Crisis* was/were harmed in an amount greater than fifty million dollars (\$50,000,000) due to Brock and Podesta threatening media outlets and making false statements to cause such outlets to blacklist Plaintiff Gary Byrne.

59. Enterprise illicit activities satisfy Arkansas law (the State from where the Enterprise commenced over a decade ago) underlying punitive treble damages for defamation (allowing treble damages for defamation), and also necessitate that treble damages be awarded for violation of the federal RICO statute.

60. Enterprise “SuperPACs” illegally coordinating with and illicitly supporting the unsuccessful presidential bid of Hillary Clinton created and directed by Brock, spent in excess of \$192 million in the 2016 election cycle alone to undermine Gary Byrne and other Clinton

“enemies,” much of which was spent in illegal coordination with, among and between Hillary for America (Hillary Clinton’s presidential campaign), Hillary Clinton, Brock, Media Matters, *Correct the Record* and related Brock entities, in order to seek vengeance against and smear Officer Gary Byrne and others whose truth-telling threatened the Enterprise long-term objective of electing Hillary Clinton as the 45th President of the United States.

61. In preparation for the 2016 federal election cycle, the Enterprise and Brock made no secret of being wholly partisan in running a steady stream of opposition research (primarily false) and defamation through defendant American Bridge and providing *per se* defamatory information on/against prominent Republicans and Officer Byrne, to the pro-Hillary Clinton Super PAC “Priorities USA”, and (illegally) to “Hillary for America” – in addition to the defamatory publication of information against Plaintiffs described herein and in furtherance of Enterprise obstruction of the Clinton private server investigation(s), both by wire and mail.

62. In October of 2016, a group known as “Wikileaks” published American Bridge’s “summary of accomplishments” during the 2016 campaign up to and including that date, revealing *entirely partisan* examples of Brock boasting of mainstream media being “sold” including CNN, *The Hill*, and *Roll Call* (*all of whom subsequently cooperated with Brock in not only this illicit activity but unwittingly in Enterprise FISA abuse, false statements under oath and myriad obstruction of justice*).

63. Brock and his primary but certainly not only defamatory vehicle of choice, *Correct the Record*, **FROM THE DESK OF DAVID BROCK**, defamed Plaintiff and caused significant damage and material harm to his reputation and business, and have recently illicitly underwritten the services of Enterprise Member CREW, a previously nonpartisan entity but is now entirely (and illegally) partisan – and which is illicitly paid by

Brock (based upon Soros and Daniel Jones funding) as part of the *#Resistance* – their mission is to destroy those like Plaintiffs, and the presidency of the 45th President, through unethical, partisan defamation, litigation and related tactics.

64. Defendants David Brock, American Bridge, CREW and Shareblue have *openly conceded* their illicit role in this attempt to damage the Trump presidency, using tactics employed to cause injury to the business of Plaintiff, *see Exhibit “A”* hereto - in an attempt by the aforementioned to illegally raise money from defendant Soros and named unknown illicit funders and others who seek to undermine the U.S. government, such as former SSCI staff director Daniel Jones and his laundered Soros funding.

65. Plaintiff Gary Byrne was defamed, as a matter of law, by Defendants Brock and *Correct the Record* utilizing tactics (and resources) that were buttressed by the Enterprise and directly approved by Hillary Clinton and her surrogates – not unlike the illicit tactics set forth in “*Exhibit A*”.

66. The Enterprise and its primary individual funder, George Soros, were responsible for underwriting funding for the defamation of Byrne and also have continued their illegal scheme with the intent of destroying the presidency of Donald Trump with the assistance of Daniel Jones and Fusion GPS – an objective they have readily conceded.

67. In 2016, *Correct the Record* focused solely on supporting Enterprise tactics and defending Hillary Clinton (and destroying her “enemies”) through their defamatory tactics – to accomplish this, and to destroy Gary Byrne, Brock converted *Correct the Record* into an Enterprise-driven super PAC.

68. Brock has openly conceded the Enterprise-driven coordination between *Correct the Record* and Hillary for America (the campaign organization supporting Hillary Clinton in her bid for President in 2016).

69. Brock has explicitly boasted about *every* tactic used by the Enterprise in this case – part of Brock’s *modus operandi*, by his own admission, is the use of “journalistic sleight of hand” to deceive journalists and law enforcement, (and by inference this Court) and defamation to destroy those who “cross” him or the Enterprise – including but not limited to the implicit threat of bodily harm.

70. The Internal Revenue Service demands, and U.S. law dictates, that Brock’s nonprofit entities, as well as the co-conspirators discussed in *Exhibit “A”*, are barred from engaging in partisan activity and cannot favor or oppose any political candidate.

71. In June of 2015, Brock himself openly admitted that “from the beginning” he and his myriad nonprofit entities served a “major role in specifically defending Hillary Clinton” – notwithstanding his additional admission of open partisan collusion between *Correct the Record* and Hillary for America on strategy and tactics such as defaming Plaintiff.

72. Brock and his illicit entities, in collusion with the Clintons and the Enterprise, have as a pattern defamed sophisticated authors in the same manner as they defamed Gary Byrne – these authors include Pulitzer Prize recipients Jeff Gerth and Don Van Natta of the *New York Times* who in 2007 wrote a book entitled “*Her Way: The Hopes and Ambitions of Hillary Rodham Clinton*,” which was viewed by some as “critical of” Hillary Clinton.

73. Enterprise defendant John Podesta assisted Brock and Tom Mazzie of “MoveOn.org” to form (and raise millions for) “Progressive Accountability.org”, which spent tax-exempt money for the purpose of opposing the candidacy of Senator John McCain for president in 2008.

74. The “Center for American Progress” now managed by progressive scholar Neera Tanden (who succeeded defendant John Podesta) has openly and devastatingly conceded in writing (between Tanden and John Podesta) that *Correct the Record* and Brock were “violating the law” when they coordinated with the Clinton campaign – including but not limited to the defamatory falsehoods directed at Plaintiff.

75. Hillary Clinton and certain others including Defendant John Podesta destroyed thousands of Enterprise emails, as well as (and in addition to) emails containing classified information including proof of criminal misconduct by the Enterprise in the midst of a tainted criminal investigation of Hillary Clinton – raising the aforementioned inference that the destroyed e-mails concerning Plaintiff Gary Byrne contained classified information and proof of criminal conduct against him.

76. Contemporaneously, Hillary Clinton utilized at least thirteen (undisclosed) mobile electronic devices to communicate classified information and instructions to, *inter alia*, defame Plaintiff Gary Byrne on behalf of the Enterprise and to obstruct justice by covering up Enterprise wrongdoing.

77. Any demonstrable, *i.e.*, real, investigation of Hillary Clinton and Enterprise activity would definitively conclude an inference as to instructions to and from the Enterprise actors to defame Officer Gary Byrne.

78. On this basis alone, the Enterprise and Hillary Clinton committed felony offenses, destroyed evidence under subpoena, and thereby obstructed justice – albeit a mere fraction of their overall Enterprise criminal scheme exposure.

79. Defendants Hillary Clinton and John Podesta directed the payments of bribes to independent contractors located in various states, and federal public officials, to create sources of false information about Officer Byrne, the particular States herein to be determined during discovery.

80. In addition to the destruction of documents under congressional subpoena and court order from this honorable court concerning Gary Byrne, the due and proper administration of the law was also corrupted by Strzok and McCabe, the senior FBI managers who along with Comey unilaterally concluded that Hillary Clinton lacked the requisite intent to violate the law when she concededly used private email servers to transmit classified information and then unlawfully and intentionally destroyed thousands of documents including those with respect to Officer Byrne.

81. Among other things, Strzok (along with Ohr) corruptly influenced and impeded his agency's investigation (and deeply violated his legal and ethical obligations as a public servant), as relevant here to Officer Gary Byrne.

82. Strzok also corruptly conducted the FBI interviews of Clinton and her top aides, Cheryl Mills and Huma Abedin, in the illegal e-mail servers and document destruction probe (including Byrne), with the approval of Enterprise Members McCabe and Comey – thereby conspiring with McCabe, Comey and Attorney General Loretta Lynch to obstruct justice.

83. Congress has issued contempt citations against the FBI and Justice Department for failing to produce, pursuant to subpoena, documents and an FBI witness over the time, place and manner in which the Obama administration used the “salacious” and unsubstantiated "Trump Dossier" to surreptitiously surveil and run HCS operations against Trump associates and Clinton enemies such as Officer Gary Byrne - and to mislead the FISC.

COUNT ONE
RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT
“RICO” 18 U.S.C.A. § 1962(c)

Against Hillary Clinton, John Podesta, David Brock, and Peter Strzok

84. Plaintiffs incorporate by reference the allegations set forth in ¶¶ 1 - 83, herein.

85. 18 U.S.C. § 1962(c) makes it “unlawful for any person employed by or associated with any enterprise engaged in, or in the activities of which affect, interstate or foreign commerce, to conduct or participate directly or indirectly, in the conduct of such enterprise’s affairs through a pattern of racketeering activity or collection of unlawful debt.”

86. At all times relevant, Defendants Hillary Clinton, John Podesta, David Brock, and Peter Strzok are persons as described in 18 U.S.C. § 1961(3) in that they are individuals capable of holding a legal or beneficial interest in real property.

ENTERPRISE

87. Hillary Clinton, John Podesta, David Brock, Peter Strzok, and others, including but not limited to Brock’s non-profit entities Media Matters for America, Correct the Record, and American Bridge 21st Century, Bruce Ohr, George Soros, Jonathan Wackrow, and Jan Gilhooly, constituted an association in fact enterprise as described in 18 U.S.C. § 1961(4), as it is an association-in-fact of individuals and entities. The Enterprise’s activities affected interstate or foreign commerce as, for example, false information generated about Plaintiff Byrne was provided by Brock to media outlets via *Correct the Record* and were disseminated throughout the country. It is believed that Enterprise members also paid bribes to individuals, some of whom are federal or local public officials, located in multiple states to create false sources of information to be used against Byrne. As described below, this Enterprise functioned as continuing unit; there were relationships among those associated with the enterprise to function with a

common purpose, and longevity of association, as enterprise members worked together for a number of years to defame Byrne and cause him reputational injury and incurrence of legal fees.

Purpose and Relationships

88. The Defendants' Enterprise had the common purpose to prepare a false and defamatory "dossier" on Plaintiff Gary Byrne, which they could disseminate throughout the media and therefore harm Plaintiffs. The members also functioned together so that e-mails residing unlawfully on Hillary Clinton's private server could be destroyed which included documents and e-mails evidencing the bribery of independent persons who would prepare the fake and damaging information, and delete information that illegal investigative sources (HSGs) were used against Officer Byrne.

89. The common purpose and interrelationships (structure) between the Enterprise constituents, consisting of legal entities and individuals, and others, described above, is separate and apart from the racketeering activity consisting of obstruction of justice in violation of section 1512, Travel Act violations in violation of section 1952(a)(3), and federal bribery statute section 201(c). Each RICO Defendant is different and distinct from the association in fact Enterprise whose members collectively functioned together as a continuing unit. The Enterprise activities involved/involve coordination, by their own admission, between David Brock's partisan nonprofits and the Hillary for America presidential campaign (and its various complicit entities) and Enterprise participants with the intent to criminally injure, and defame, Hillary Clinton "enemies," which include, but are not limited to, Plaintiff Byrne.

CONDUCTING AFFAIRS OF THE ENTERPRISE

90. Each Defendant participated in the "operation or management" of the Enterprise's affairs, as each Defendant had at least "some direction" in the conduct of the affairs of the Enterprise. Hillary Clinton, along with John Podesta, with the knowledge and complicity of Peter Strzok, and others destroyed

emails implicating themselves in paying bribes to obtain fake and damning information about Plaintiff Gary Byrne and using illegal HSGs to surveil Byrne. Hillary Clinton utilized at least thirteen (undisclosed) mobile electronic devices to communicate classified information and instructions to, *inter alia*, defame Plaintiff Gary Byrne on behalf of the Enterprise and to obstruct justice by covering up Enterprise wrongdoing. David Brock, through his non-profits, knowing that bribes had been paid to independent contractors to gin up fake information about Plaintiff Byrne, provided defamatory information to media outlets. Upon verifying that Strzok was instrumental in wrongdoing like assuring that emails concerning Gary Byrne were withheld and destroyed, and that a Human Confidential Source was used against Byrne, the FBI terminated Strzok both from FBI employment and federal government employment.

91. Each Defendant was conducting the affairs of the Enterprise, and not just their own affairs, as the fraudulent schemes could only have worked based upon the participation of each Defendant, each of whom, working together, benefited from damage to Byrne's reputation.

RACKETEERING VIOLATION

92. From at a time before year 2016 through the present time, Defendants Hillary Clinton, John Podesta, David Brock, Peter Strzok, with others, persons associated with Enterprise, did knowingly and unlawfully conduct or participate, directly or indirectly, in the affairs of the Enterprise through a pattern of racketeering activity, *i.e.*, acts indictable under 18 U.S.C. § 201; 1512; and 1952, all in violation of 18 U.S.C. § 1962(c). Plaintiff alleges that the above activities constitute acts indictable as 'racketeering activity,' as that term is defined in 18 U.S.C. §§ 1961(1) (B).

93. The Travel Act claims are reinforced by the use of mail and facilities, *e.g.* the Massachusetts safe house for conspiracy in interstate commerce with clear intent to promote, manage, carry on and facilitate the establishment, promotion, management and carrying on of unlawful activity,

including but not limited to bribery and those crimes set forth in Title 31, United States Code, chapter 53 and 18 United States Code § 1956 – all involving financial crime and money laundering.

94. The obstruction of justice claim is buttressed as Hillary Clinton's emails suggest that downloading and uploading material in this fashion was a commonplace activity in her office; in June 2011, a staffer encountered difficulty transmitting a document to her by means of a classified system and Hillary Clinton simply instructed him in the following (illegal) way to strip the classified markings from the document and send it on as an unclassified email - "Turn into nonpaper w no identifying heading and send nonsecure".

95. On May 19, 2015, a DOJ official named Peter Kadzik, writing from a personal email account, emailed Enterprise defendant John Podesta to warn of a House investigation into Clinton's emails and destruction of evidence – thereby furthering the mass obstruction (deleting evidence) with a "tip" from the Obama Justice Department to the Hillary Clinton campaign chairman.

96. On April 9, 2016, senior FBI manager Peter Strzok interviewed Hillary Clinton close confidant Cheryl Mills and, thereby, by omission and commission, sought to and did interfere with the investigation into the Enterprise Clinton e-mail servers in exchange for lenient treatment of Secretary Clinton. During the final months of the corrupt Clinton email investigation, FBI counterintelligence agent Peter Strzok was advised of an irregularity in the metadata of Hillary Clinton's server that suggested a possible breach, but intentionally conspired with others, including Defendants Hillary Clinton and John Podesta, and FBI officials in failing to follow up in any meaningful way and thus conspiring to obstruct justice.

97. As underlying inference for this conspiracy to obstruct justice, this group of known and unknown named FBI officers violated the most basic of intelligence community directives, ICD 732, by

which standard damage assessments are required to be done “in response to unauthorized disclosure or compromise of classified national intelligence.”

98. ICD 732 is basic, open-source counterintelligence practice, grounded in the National Security Act of 1947, the Counterintelligence Act of 2002, Executive Order 12333, and related black letter intelligence law, presidential order, and regulatory dictate in pursuance thereof – each of the co-conspirators would therefore be charged as if expertise is a presumption underlying individual and collective intent to obstruct justice; Intelligence beyond top secret was identified on the Clinton server. As Secretary of State, Clinton chose to use private, non-secure servers for government business.

99. Strzok, who sent anti-Trump text messages that resulted in him being removed from the ongoing Special Counsel Robert Mueller’s Russia probe, and along with others now from federal employment, was told about the metadata anomaly in 2016, but Strzok did not support a formal damage assessment in violation of ICD 732 – raising an inference of complicity in the destruction of information.

100. In December 2017, when the texts between Strzok and FBI lawyer Lisa Page became public, congressional sources said Strzok was “part of then FBI Director James Comey's inner circle, who advised and made edits to Comey's July 2016 public statement recommending against criminal charges in the Clinton probe”.

PATTERN OF RACKETEERING

101. From at least a few years before year 2016, and continuing through at least year 2016, and likely through the present time, Defendants conducted the affairs of the Enterprise through a pattern of racketeering.

102. Plaintiffs allege that the course of conduct engaged in by the RICO defendants constituted both “continuity” and “relatedness” of the racketeering activity, thereby constituting a pattern of racketeering activity, as that term is defined in 18 U.S.C. § 1961(5). Plaintiff can show the “relatedness”

prong because the predicate acts of bribery and obstruction of justice have the “similar purposes, results, participants, or methods of commission and/or are related to the affairs of the Enterprise,” which was, inter alia, to gin up fake information to discredit Plaintiff(s), and destroy documents which would have implicated Defendants.

103. Plaintiffs allege that the racketeering activity (bribery, obstruction by destroying documents relevant to illegal activity involving Officer Byrne) began at least a few years before year 2016 continued through at least year 2016 thereby constituting a substantial period of time and satisfying the “closed-ended” test for continuity. Plaintiffs also believe that this obstruction continues to this day as Defendants and Enterprise members continue to associate for the purpose of defaming Plaintiff and damaging his reputation thereby causing him injury. Therefore, their conduct of bribe paying and destroying documents gives rise to the inference that such offenses would have continued indefinitely, if not interrupted.

PROXIMATE CAUSATION

104. As a result of Defendants’ violations of 18 U.S.C. §1962(c), Plaintiff has been damaged by and has been injured in an amount proven at trial, but not less than \$ 100 million.

105. As a direct and proximate result of Defendants violations of 18 U.S.C. §1962(c) and §1964(c), Plaintiff is entitled to three-fold damages and the costs of suit, including reasonable attorneys’ fees.

106. Plaintiff demands that judgment be entered against Defendants for no less than \$1,000,000,000, jointly and severally, including an award of trebled damages as consistent with 18 U.S.C. § 1964(c), compensatory and actual damages, reasonable attorneys’ fees, pre-judgment interest, post-interest costs, and an award that this Court deems just and proper.

SECOND CAUSE OF ACTION

Conspiracy to Engage in a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(d)

Defendants Hillary Clinton, John Podesta, David Brock, and Peter Strzok

107. Plaintiffs repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein, and specifically repeat and re-allege the allegations under the First Cause of Action concerning RICO liability.

108. Defendants did cooperate jointly and severally in the commission of two or more of the predicate acts that are set forth at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. § 1962(d).

109. Plaintiffs further allege that all Defendants did agree to commit two or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e., a continuing threat of their respective racketeering activities, also in violation of 18 U.S.C. § 1962(d). Each Defendant agreed that a conspirator would commit at least two acts of racketeering, i.e., bribery and obstruction of justice, in the conduct of the affairs of the Enterprise.

110. Plaintiffs demand that judgment be entered against Defendants for no less than \$1,000,000,000, jointly and severally, including an award of trebled damages as consistent with 18 U.S.C. § 1964(c), compensatory and actual damages, reasonable attorneys' fees, pre-judgment interest, post-interest costs, and an award that this Court deems just and proper.

THIRD CAUSE OF ACTION

(Pendant Defamation Claim Under Arkansas Law)

Hillary Clinton, John Podesta, and David Brock

111. Plaintiffs repeat and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein.

112. Plaintiffs, and in particular Officer Gary Byrne, were defamed by all said defendants under Arkansas Code, Title 16, Subtitle 5, Chapter 63, Subchapter 2, §16-63-207 – Libel and Slander.

113. ARKANSAS CODE §16-63-207(a)(1) (2012) states: “In an action for libel or slander, it shall not be necessary to state in the complaint any extrinsic facts for the purpose of showing the application to the plaintiff of the defamatory matter out of which the cause of action arose. It shall be sufficient to state generally that the defamatory matter was published or spoken concerning the plaintiff.”

114. In Arkansas, the ostensible “home” of the Enterprise wrongdoing, legal precedent requires only that “a substantial and respectable minority” of the plaintiff’s community would consider the Enterprise slurs to be defamatory; the so-called “majority sentiment”, a far higher standard, *cannot* be considered by either the Arkansas judge or jury.

115. Byrne suffered extraordinary reputational injury and, as noted throughout this complaint, devastating monetary damage to his business as an author and commentator.

116. Byrne is not a “public figure”, in any sense of that legal term of art.

117. Printed publications, images, online statements, *e.g.*, “***Correct the Record FROM THE DESK OF DAVID BROCK***”, all may constitute libel in Arkansas – even if they were repeated millions of times on social media, weblog commentary, and related defamatory missives.

118. Slander, which occurred repeatedly in this case, is spoken or transitory defamation; Byrne and *Crisis* were slandered repeatedly by Gilhooly and Wackrow on CNN.

119. In several separate appearances on CNN, Gilhooly and Wackrow both provided wholly and intentionally false renditions, set forth as fact, of Byrne’s job responsibilities and access to President and Hillary Clinton, in an attempt to discredit Byrne’s observations set forth in *Crisis*.

120. All defendants, individually and collectively, attempted to destroy the reputation and business of Byrne and other Plaintiff with false statements in writing and on television.

121. Hillary Clinton, John Podesta and David Brock ordered that Byrne be defamed, and bribed government officials (e.g., Strzok, Ohr) because Plaintiff told the truth about Hillary Clinton in *Crisis*, and because *Crisis* became an immediate bestseller on the *New York Times* list for nonfiction; Brock also pressured and paid off over 50 media outlets to blacklist Byrne, thus completely and *ad infinitum* destroying his earlier putative success.

122. The Enterprise used the same corrupt intimidation tactics, including but not limited to surveillance and illegal leaks, against Byrne that they are now using against President Trump, in a successful attempt to destroy Plaintiff's business.

123. As a result of defendant's defamation, Plaintiff is entitled to \$50.5 million in damages.

124. Plaintiff will prevail as a matter of law, as the Defendant's defamation was entirely and intentionally false and made with the purpose of damaging Plaintiffs, who must be awarded treble damages jointly and severally in the amount of \$151.5 million.

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DEMOCRACY MATTERS

Strategic Plan for Action

PRIVATE & CONFIDENTIAL

MEDIAMATTERS
FOR AMERICA



CREW

Shareblue

Strategic Plan for Action

THIS IS NOT WHAT WE PLANNED, BUT IT'S WHAT WE'RE BUILT FOR

The progressive infrastructure groups we've built together were started long before Hillary Clinton ran for president. They were always intended to be the first line of defense—and offense—when we are under siege.

If we keep fighting, our groups *will* last, we will continue to build for the future—and we will win again.

We have the mandate.

Together, we won the popular vote and Democrats picked up seats in the Senate and the House.

Trump is the least popular incoming president in modern history and the outgoing president and popular vote winner are again the most admired man and woman in the nation.

The country did not vote for Trump-style change.

Trump has the legal authority, but we have the moral authority—and the moral responsibility—to oppose him.

We will fight, every day.

We are going to fight for the things in which we believe, and we are going to fight against any attempt to erode the cornerstone work and values of the progressive movement and this pluralistic nation.

We are going to resist the normalization of Donald Trump. His every conflict of interest, his every bit of cronyism, his every move toward authoritarianism, his every subversion of our democratic systems and principles, his every radical departure from foreign and domestic policy norms.

We are going to contest every effort, at every level of government, to limit rights, rescind protections, entrench inequality, redistribute wealth upwards, or in any other way fundamentally undermine the tenets of egalitarianism that must serve as the bedrock of our democracy.

We will apply lessons learned.

Generally speaking and simply put, Democrats got clobbered in the digital space.

Digital programs—both tactical and messaging—failed to actively listen to and engage the online grassroots universe.

The Trump camp spoke effectively to the grassroots and relied on online channels to disseminate information and misinformation and influence the media, even getting fake stories onto cable TV.

And the right colonized Facebook, which has established a virtual monopoly on information distribution.

Our digital efforts were largely focused on changing the narrative with the traditional media versus voters. This worked to a point but wasn't enough in the face of a news media incentivized by profit and access and fearful of intimidation and bullying by the Trump forces.

We will fully adapt to the new reality, and we will win.

Here's how:

In the next four years, **Media Matters** will continue its core mission of disarming right-wing misinformation, while leading the fight against the next generation of conservative disinformation: The proliferation of fake news and propaganda now threatening the country's information ecosystem. Here's what success will look like:

- **Serial misinformers and right-wing propagandists inhabiting everything from social media to the highest levels of government will be exposed, discredited.**
- **Internet and social media platforms, like Google and Facebook, will no longer uncritically and without consequence host and enrich fake news sites and propagandists.**
- **Toxic alt-right social media-fueled harassment campaigns that silence dissent and poison our national discourse will be punished and halted.**

American Bridge will cement itself as the standard-bearer of opposition research, build on its role as a progressive clearinghouse for information that drives the narrative on Republican officeholders and candidates, and be at the epicenter of Democrats' work to regain power—starting in 2017 and building to 2020. Here's what success will look like:

- **Trump will be defeated either through impeachment or at the ballot box in 2020.**
- **The balance of power will shift back to Democrats. We will measurably impact US Senate, gubernatorial, and state legislative races.**
- **We will free ourselves from solely relying on the press. Our robust digital program will reach voters directly online.**

CREW will be the leading nonpartisan ethics watchdog group in a period of crisis with a president and administration that present possible conflicts of interest and ethical problems on an unprecedented scale. CREW will demand ethical conduct from the administration and all parts of government, expose improper influence from powerful interests, and ensure accountability when the administration and others shirk ethical standards, rules, and laws. Here's what success will look like:

- **Trump will be afflicted by a steady flow of damaging information, new revelations, and an inability to avoid conflicts issues.**
- **The Trump administration will be forced to defend illegal conduct in court.**
- **Powerful industries and interest groups will see their influence wane.**
- **Dark money will be a political liability in key states.**

Shareblue will take back social media for Democrats. We will delegitimize Donald Trump's presidency by emboldening the opposition and empowering the majority of Americans who oppose him. Shareblue will be the dynamic nucleus of a multi-platform media company that informs, engages, and arms Americans to fight. Here's what success will look like:

- **Shareblue will become the de facto news outlet for opposition leaders and the grassroots.**
- **Trump allies will be forced to step down or change course due to news pushed by Shareblue.**
- **Under pressure from Shareblue, Democrats will take more aggressive positions against Trump.**
- **Shareblue will achieve financial sustainability while diversifying content offerings and platforms.**
- **Top editorial and writing talent will leave competitors to join Shareblue.**

Right now, our institutions are among the critical few that stand between the America we love and the abyss. We must protect and defend our democratic values.

We will not back down. We will only move forward.

We hope you'll fight with us.

MEDIAMATTERS FOR AMERICA

est. 2004

The Top Watchdog Against Fake News and Propaganda

Transforming the Media Landscape

Media Matters will continue our core mission of disarming right-wing misinformation, while leading the fight against the next generation of conservative disinformation: The proliferation of fake news and propaganda now threatening the country's information ecosystem. Utilizing our unique capacity as the nation's premier progressive media watchdog and rapid-response research center, Media Matters will further increase our visibility in the ecosystem, strengthen the ability of our supporters and partners to influence it, and improve the infrastructure on which it rests.

THE TOP WATCHDOG AGAINST FAKE NEWS AND PROPAGANDA

COMPETITIVE ANALYSIS

The onslaught of well-funded right-wing media manipulation brings with it significant challenges.

The conservative Media Research Center, with an annual operating budget of \$18 million, works closely with establishment right-wing media to reinforce the myth of a liberally biased media, push journalism to the right, and propel misinformation into the mainstream.

Breitbart, which has received millions in funding from extremist billionaires close to the Trump administration, provides a nexus point for the so-called alt-right (the newest branding for American white nationalism, anti-Semitism, and misogyny) to exploit vulnerabilities throughout the media landscape. With a powerful ally in the White House (former chief executive Steve Bannon will be Trump's chief strategist), Breitbart plans to export its brand of anti-establishment racism on a global scale.

Meanwhile, the right has spent millions building and maintaining a next generation conservative news infrastructure, which it effectively weaponized through social media and affiliated sites during the 2016 presidential campaign.

The relationship is symbiotic.

Donald Trump uses his Twitter account to manipulate news cycles with lies; attack press outlets that produce critical stories about him; and share stories from fake news purveyors, conspiracy websites, and right-wing news outlets.

"Trump TV" (the streaming news upstart Right Side Broadcasting) gives him a platform to bypass other news media and distribute programming directly to his supporters. (Trump TV will reportedly be present at White House press briefings even without traditional press credentials.)

In a hyper-fragmented media environment, the right is aggressively exploiting vulnerabilities and finding new ways to poison the information ecosystem with lies.

Media Matters is ready to stop them.

OVERARCHING STRATEGY

In our last four-year strategic plan, we described the media landscape ahead as being “sandwiched between two realities.” We foresaw a landscape where, on the one hand, legacy outlets would ostensibly remain at the forefront, but their power and relevancy would wane as they made abrupt shifts to respond to changing economic realities. On the other hand, fragmentation among audiences would create an explosion in new digital outlets yielding increases in confirmation bias, trap information consumers in the filter bubble isolating them from contrary views, and foment extremism.

We are no longer sandwiched between two realities. The new reality is the one of fragmentation—and all that comes with it. Specifically, Media Matters must respond to three distinct challenges:

- **The decay of journalism.**
- **The rise of fake news, disinformation, and active propaganda efforts.**
- **An information ecosystem that furthers extremism and cultivates a climate of harassment.**

To stop right-wing media manipulation in this environment, we must further increase our visibility in the ecosystem, strengthen the ability of our partners and supporters to influence it, and improve the infrastructure on which it rests.

TOP OUTCOMES

Over the next four years, Media Matters will focus on achieving the following outcomes:

Serial misinformers and right-wing propagandists inhabiting everything from social media to the highest levels of government will be exposed.

Internet and social media platforms, like Google and Facebook, will no longer uncritically and without consequence host and enrich fake news sites and propagandists.

Toxic alt-right social media-fueled harassment campaigns that silence dissent and poison our national discourse will be punished and halted.

STOPPED DONALD TRUMP'S PHONE INTERVIEW PRIVILEGES.

Media Matters was the first to call out national cable broadcast networks for allowing Trump to phone in to their shows instead of forcing him to appear via satellite or in studio. Because of this unprecedented privilege, Trump could appear on more shows (he conducted 69 phone interviews in the first 69 days of 2016 alone), and he could avoid being confronted by images and interviewers showing his lies for what they are. As a result of our campaign urging major networks to correct course, CBS News and NBC News publicly stated they'd discontinue Trump's phone privileges. Eventually others followed suit and Trump's ability to control the news cycle from the comfort of his home was greatly reduced.

THE MEDIA MATTERS PLAN

Media Matters will push back on conservative misinformation across all media channels in the information ecosystem and specifically neutralize the effects and infrastructure of the newly empowered alt-right.

We will focus our efforts into the following three areas:

- **Leverage our authority to encourage good journalism.**
- **Develop technologies to serve as an early warning system for fake news and inoculate social media platforms from exploitation and abuse.**
- **Implement a robust omnichannel communications strategy and mobilize a massive grassroots advocacy effort.**

ENCOURAGE GOOD JOURNALISM

Traditional news outlets are dying.

Their business models have been decimated over the last 20 years as their audiences have fallen, competitors have grown, and advertising revenue has plummeted.

Journalists face an increasingly precarious personal financial position as news outlets lay off reporters or fold altogether.

This position of weakness, combined with journalists' institutional tendency to portray political problems as equally the fault of both Democrats/progressives and Republicans/conservatives regardless of the facts, suggests that the press will continue to normalize Donald Trump and his allies.

Journalists who confront the extreme reality of a Trump administration experience personal harassment. Media outlets that hold him accountable may be subject to boycotts, enflamed by the president himself. Both risk access to government information and officials.

Media Matters must grapple with the effects of decaying journalism and ensure that truth triumphs in the information ecosystem—not only as a means to combat misinformation but because it's necessary for our embattled democracy to survive.

Here's how we'll do it:

RESEARCH

Even our fiercest detractors acknowledge the veracity our research. Recognizing that Media Matters' strength comes from its research products, we will elevate and promote their branding and use.

In early December 2016, Media Matters restructured our research department to improve our ability to engage in deep dive research studies and opposition research while simultaneously supporting rapid response that bolsters the progressive movement.

In 2017, we will revamp the Media Matters website to make this vital and often evergreen information significantly more accessible. Every day, Media Matters receives requests from members of the news media and progressive partners that can be satisfied by simply pointing them to previously published research content. Developing a research portal will capitalize on this demand.

17,929

**news articles highlighting
or relying on Media Matters**

Along these lines, when it comes to ultimately moving the needle and shaping coverage, few products rival a Media Matters quantitative study that puts hard numbers on the amount and type of coverage a topic has received, and the people and organizations sought to discuss it. We know this based on feedback from journalists as well as the impact these studies have generated. Increasing the number of quantitative studies we publish will strengthen Media Matters' overall brand while increasing our credibility with activists, media, and our movement partners.

Additionally, Media Matters' core media monitoring and research teams, which focus on the news of the day, are bolstered by five issue-specific teams led by experts who study how media cover the key progressive topics of our time, even when they do not lead the news. Media Matters' issue teams are focused on correcting misinformation on: gun violence and public safety, LGBT equality, reproductive health and gender equality, climate and energy, and economic policy. Our issue teams work daily with movement partners specializing on these issues to amplify our work and change the narrative on how these issues are covered in the media.

“Over the years, Media Matters has won or assisted in a number of tangible victories, from getting Glenn Beck off cable news to holding 60 Minutes accountable for its faulty Benghazi reporting.”

—The Nation

MEDIA ADVOCACY—PUNISH ENABLING AND COMPLACENCY

Media Matters will be vigilant in holding news media accountable for even the slightest bit of normalization of Trump. We will encourage journalists to defend standard practices, like the protective press pool and media credentialing, and strive for higher standards against this new threat.

When Breitbart applied for Permanent Senate Gallery Press Credentials, Media Matters was quick to act by advising the credentialing committee of the myriad ways that Breitbart violated their requirements. Additionally, Media Matters did something that the committee was unable to do: A deep dive study of Breitbart content, reviewing thousands of their stories to demonstrate that they do not meet the credentialing requirement for original reporting.

Media Matters also first sounded the alarm about Breitbart's international expansion and began working with journalists in the United States and abroad to educate them on Breitbart's model as well as the larger universe of alt-right activity for which Breitbart is the nexus. Most significantly, we helped journalists understand the symbiotic relationship between Breitbart and opposition political parties so that they can accurately report on the danger that is spreading across western democracies.

Supporting journalism means just that: Helping news media navigate the complicated alt-right landscape, defending them against harassment and abuse from alt-right pockets, while simultaneously ensuring that they do the work that is so vitally needed.

NEUTRALIZE GOVERNMENT DISINFORMATION

What happens when the most dangerous source of misinformation is no longer right-wing radio hosts or Fox News, but the federal government itself? Misinformation coming out of government agencies can have devastating consequences. Look no further than government-fueled misinformation amplified by an uncritical news media that led the country to war with Iraq in 2003.

The notion that the United States government under Donald Trump could become a source of misinformation is not far-fetched—and in fact seems all but inevitable. Trump himself has repeatedly pushed lies on his social media accounts. And several of his top officials have promoted fake news stories, including the person that he has put in charge of the official White House social media accounts, who has also used social media to harass detractors.

Bottom line: Media Matters must be fully prepared to identify misinformation coming from government and fight it at every turn—both directly and indirectly by prodding journalists to scrutinize federal claims.

As part of our research department restructuring, we have added a dedicated team of media analysts that will use new technologies to help track government disinformation. Media Matters is prepared to confront the United States government under a proven and dangerous dissembler.

INNOVATE AGAINST FAKE NEWS AND PROPAGANDA

Facebook's virtual monopoly on information distribution has supercharged the fragmented landscape.

Almost two-thirds of Americans (200 million) consume news on social media. By contrast, less than half of adults watch local news, less than a third watch cable news or nightly network news, a quarter listen to radio, and only one in five read newspapers.

In 2016, a full two-thirds of Facebook users used the platform to get news. Facebook's algorithm fuels confirmation bias by feeding content from outlets that tell the users what they want to hear. Fake news purveyors exploited this vulnerability for profit and political influence.

Fake news was so profitable during the 2016 election that teenagers in Macedonia began publishing pro-Trump propaganda for the sole purpose of making money. In instances where fake news can be funded by political operations or even foreign governments, Facebook's algorithm is the only barrier to mass access.

We are already experts in monitoring the way information moves through the media landscape; we understand where and how a lie is manufactured and how it proliferates.

Now is the time to build on our expertise and unique audio and video archive to develop the technologies necessary to combat this new onslaught of misinformation.

Here's how we'll do it:

BIG DATA ANALYSIS AND EARLY WARNING SYSTEM

Media monitoring enables us to identify pernicious misinformation and develop strategies for combating it. Historically, this has meant monitoring conservative media, television news, and newspapers.

But relying on human media monitors is no longer sustainable. Fake news and alt-right communities are multiplying exponentially.

FORCED CHANGES AT 60 MINUTES OVER BENGHAZI SMEAR.

In October 2013, CBS aired a *60 Minutes* report that purported to raise further questions about the Obama administration's response to the Benghazi attack based on an interview with a so-called "eyewitness." Our relentless research and pressure provoked reporting that proved the account to be a total fabrication. The network was forced to issue a correction and apology, and the publisher pulled the "eyewitness's" book (published by CBS's corporate cousin) from the shelves. After the network launched an internal investigation—for which we were the first to call—into the origins of its faulty reporting, the reporter and producer responsible were forced to take a leave of absence, and the show's executive producer promised to make changes to reduce the chance of repeating the error. *Slate* credited Media Matters, writing, "the fast torpedoing of CBS's Benghazi story shows how far the liberal attack machine [Media Matters] has come."

970% increase
in Facebook engagement over the
past 4 years, from 4.8 million
in 2013 to 56.9 million in 2016

Media Matters has already secured access to raw data from Facebook, Twitter, and other social media sites. We have also put in place the technology necessary to automatically mine white nationalist message boards and alt-right communities for our archive.

We will now develop technologies and processes to systematically monitor and analyze this unfiltered data.

The earlier we identify a fake news story, the more effectively we can quash it. With this new technology at their fingertips, researchers monitoring news in real time will be able to identify the origins of a lie with mathematical precision, creating an early warning system for fake news and disinformation.

PREDICTIVE TECHNOLOGY

Bringing this data analysis to scale will also allow Media Matters to identify which individuals and outlets are the most destructive forces driving fake news, misinformation, and harassment.

Cutting-edge advances in cloud computing and machine learning will enable us to identify patterns and connections that would otherwise go under the radar. We will be able to assess where and how misinformation is likely to move, who will be affected by it, and what needs to be done to neutralize it.

But predictive technologies are only as good as the data that goes into them. The more data the system has to analyze, the richer its insights. Media Matters' already extensive 12-year archive gives this new system a big jump-start.

COLLABORATING WITH SOCIAL MEDIA PLATFORMS

Outlets that push fake news are completely dependent on Facebook to spread their lies, and ad networks like Google to fund them.

Media Matters has unique insight to help fix problems in this part of the media landscape.

After Facebook responded to our campaign by acknowledging the problem of fake news and agreeing to do something about it, we began a dialogue. It became clear from these conversations that Facebook needed our help in fully understanding the problem and identifying concrete solutions. Further, it also became clear that we had information and insight that they didn't have that was helpful in educating them on the full scope of the problem. For example, Media Matters had a detailed map of the constellation of right-wing Facebook pages that had been the biggest purveyors of fake news—as well as insight into the food chain of fake news and how it was moving through the Facebook ecosystem.

Similarly, after Google revised their terms of service in order to prohibit so-called fake news sites from using their advertising network, it was Media Matters that had the information necessary to identify 40 of the worst fake news sites to which this policy applied.

GOT FACEBOOK TO COMMIT TO FIGHTING THE RISE OF FAKE NEWS.

During the 2016 election, Facebook refused to do anything about the dangerous rise of fake news or even acknowledge their role in promoting disinformation: Mark Zuckerberg called the notion that fake news is a problem "crazy." In November, we launched a campaign pressuring Facebook to: 1) acknowledge the problem of the proliferation of fake news on Facebook and its consequences for our democracy and 2) commit to taking action to fix the problem. As a result of our push for accountability, Zuckerberg did both. Our campaign was covered by prominent national political, business, and tech media outlets, and we've been engaging with Facebook leadership behind the scenes to share our expertise and offer input on developing meaningful solutions.

Social media platforms need help in identifying vulnerabilities and crafting solutions. To this end, Media Matters will serve as their partner, speaking to them in their language of big data and encouraging changes based on what we see happening in the landscape.

By applying our expertise-driven technologies and enhanced credibility, we will earn and maintain our seat at the table and improve the structures of the media landscape.

MOBILIZE

At the Republican National Convention, Stephen Bannon bragged that Breitbart News had built “the platform for the alt-right.” Weeks later, Trump appointed Bannon the head of his campaign, and now Bannon will follow Trump into the White House. The alt-right specializes in harassment and abuse and distinguishes itself from traditional right-wing media by its ability to self-organize.

But it has several key vulnerabilities.

They are largely dependent upon social media behemoths that tolerate their abusive activity. (Facebook, Reddit, YouTube, and Twitter have permitted the alt-right's presence, with some rare but notable exceptions.) They operate on the edge of the law. Their efforts are largely financed on thin profit margins. And their membership consists of weak individuals, often recruited into the movement because they fear or resent women and/or harbor racial animosity.

Both fake news and the alt-right rely on being able to operate in the shadows. They assume that no one will detect their harassment and propaganda until the damage has already been done.

To stop them, we need to become bigger and louder. Only through mass engagement can we halt their harassment and lies.

Here's how we'll do it:

OMNICHANNEL COMMUNICATIONS

Media Matters will not just manage the effects of media fragmentation; we will leverage it to advance our mission.

To this end, Media Matters will enhance our existing digital program by establishing an omnichannel communications command center to communicate with audiences in ways that are optimized for the platform on which they are already most engaged.

Put another way, we won't force information consumers to come to us for a one-size-fits-all piece of content. Instead, we will go to them with content that is tailored to their individualized way of interacting. In practice, this means that the way we present a specific issue on Facebook will be different than the way that we present it on Tumblr or Twitter—and some in our audience may not even

“I’ve gotten some tough treatment [from Media Matters] and there were times you guys were right and I internalized that and said ‘that is a lesson learned.’”

—Major Garrett, CBS News White House Correspondent
(formerly a Fox News correspondent)

“It’s often easy to trace Media Matters’ influence on a major news story.”

—National Journal

get information on social, but instead have it delivered directly to their phone via text messages.

Our award-winning digital team has incorporated elements of this strategy into our communications for the past few years, resulting in a 970% increase in engagement and a comparable increase in growth.

Now, Media Matters will fully incorporate this approach by overhauling our social media strategy, adding additional staff to our social media team, and initiating a comprehensive audience targeting and segmentation program.

We will also bring on board an expert to construct turnkey rapid-response plans so that Media Matters can squash burgeoning online harassment campaigns and fake news or saturate the landscape with truth, bypassing the news media entirely if need be.

With this capacity, Media Matters will dramatically increase our audience and engagement and effectively quash fake news and misinformation before it spreads far and wide.

MASSIVE GRASSROOTS TRUTH SQUAD

Wider reach alone won’t be sufficient. We need our audience to persistently engage in the fight against the alt-right and fake news—routinely and within their own social networks.

Too many Facebook users sit silent as extremism and misinformation fill their news feeds. Progressives in particular are significantly less likely to challenge content that pops up in their feeds compared to their conservative counterparts. Silence allows misinformation to fester.

This can’t go on.

We will train hundreds of thousands of individuals on how to identify fake news and alt-right smears in their social media networks and equip them with the tools to fight them on their own.

In December 2016, with fake news at the forefront of public attention, we added 40,000 new participants to our action list. We expect this growth to continue, and will provide trainings, resource materials, and urgent action alerts to keep participants actively engaged.

A deeper grassroots bench also means that Media Matters will be better positioned to win corporate pressure campaigns, proven to eliminate perverse incentives that reward this horrific behavior.

EVALUATION

Media Matters will constantly monitor the following indicators to know if we’re on track toward our top outcomes.

Serial misinformers and right-wing propagandists inhabiting everything from social media to the highest levels of government will be exposed. Journalists, activists, allies, politicians, and the general public will routinely utilize and weaponize our research products to understand and take action against the changing media ecosystem and the extremists seeking to manipulate it. We will continue to break engagement records and dramatically expand and diversify our reach by presenting our research in multiple formats on a variety of platforms. Key right-wing targets will see their influence diminish as a result of our work.

Internet and social media platforms, like Google and Facebook, will no longer uncritically and without consequence host and enrich fake news sites and propagandists. Social media companies will engage with us over their promotion of the fake news industry. Facebook will adjust its model

to stem the flow of damaging fake news on its platform's pages. Google will cut off these pages' accompanying sites' access to revenue by pulling their access to Google's ad platform.

Toxic alt-right social media-fueled harassment campaigns that silence dissent and poison our national discourse will be punished and halted. Hundreds of thousands of activists will join our campaigns to push back on alt-right harassment. Key alt-right figures will lose credibility and influence in response to our research and pressure.

BUDGET AND TEAM

Media Matters' core budget for 2017 is \$13.4 million, which covers a staff of 81.

This budget allows us to create a 34-person research department engaged in media monitoring, research, deep dive analysis, and rapid response. In addition, this supports five issue-specific teams housing experts that provide broad support to the progressive movement on topics key progressive issues like gun violence and public safety, LGBT equality, reproductive health and gender equality, climate and energy, and economic policy.

This budget also allows us to invest in technological innovations like the creation of an early warning system to identify the proliferation of fake news more efficiently and to create cutting-edge predictive technology that allows us to identify patterns and connections in order to assess how misinformation will move and how we can neutralize it. We will also build out our digital and video teams to a staff of a nine to create a robust omnichannel communications command center and mobilize a grassroots truth squad; and increase the number and impact of actions and advocacy initiatives we undertake to drive change and accountability across the media landscape.

SENIOR STAFF

Angelo Carusone, President. Angelo was named President of Media Matters in December 2016. Previously, he was the organization's Executive Vice President. In that role, Angelo helped run day-to-day operations, expanded the organization's online footprint, and managed accountability initiatives. In 2016, he took a leave of absence to serve as the Deputy CEO for Finance & Administration of the 2016 Democratic National Convention. In 2009, as a law student, Angelo founded the StopBeck effort, which organized participants via social media to successfully convince sponsors to cease advertising on Beck's show. In late 2010, Angelo joined Media Matters as Campaign Director and worked on its

PUSHED ROGER STONE'S BIGOTRY OFF CABLE NEWS.

Media Matters succeeded in pressuring CNN, MSNBC, and even Fox News to stop booking Roger Stone, a regular guest and longtime Trump ally. Stone has a decades-long history of employing political dirty tricks and regularly spouting violent, racist, and sexist rhetoric, and used his various platforms during the 2016 campaign to advance fringe conspiracy theories and promote fake news. In late 2015 and early 2016, we aggressively educated network producers (who had been providing Stone an uncritical platform) about Stone's background. In response to our pressure, CNN and MSNBC confirmed that Stone will no longer appear on their airwaves because of his bigotry, and Stone himself reported that he had been blacklisted by Fox News.

DropFox initiative; he later went on to serve as Director of Online Strategy & Campaigns. He organized the StopRush effort, which convinced thousands of advertisers to refuse to sponsor Limbaugh's program. And he launched the viral DumpTrump campaign in 2012 that was responsible for convincing many of Donald Trump's business partners to sever their relationships with Trump. He holds a B.A. in American Studies from Fordham University and a J.D. from the University of Wisconsin Law School.

Julie Millican, Vice President. Julie has been with the organization collectively for over eight years in various capacities since she first joined as a researcher in 2006. During her time, she has been a Researcher, Assistant Research Director, Advisor, Deputy Research Director, and also Chief of Staff. She has written extensively about the 2008 election and was routinely cited by the nation's leading papers. Over the years, Julie has been responsible for managing all Research Department resources, involved in organization-wide strategy, overseeing the hiring process, executing restructuring, and overseeing organizational operations. She holds a B.S. in Sociology from Appalachian State University and a M.A. in Clinical Psychology.

Sam Zegas, Senior Advisor. Sam is responsible for spearheading Media Matters' technological innovations, organizational planning, and operations. Sam is a recognized authority in linguistics and multi-lingual project manager with experience in international affairs. Prior to joining Media Matters, Sam was a management consultant at Accenture. There he spent several years helping the Department of State to modernize its international supply chain and asset management systems. He then transitioned to Boston Children's Hospital, where he served as the Acting Director of the International Health Services department—the world's largest international patient program at a pediatric hospital. He has full proficiency and professional experience in German, French, Spanish, and Slovenian, and is also able to translate Russian and Italian. He holds a B.A. in linguistics and anthropology from Harvard University. He is currently on deferment from a joint MBA/MPP program from Harvard Business School and The Kennedy School of Government.

Our Impact

DISRUPTED RUPERT MURDOCH'S TIME WARNER EXPANSION.

As soon as Rupert Murdoch's 21st Century Fox announced its bid to acquire Time Warner in July of 2014, Media Matters kicked into high gear with a coordinated multi-level pressure campaign urging Time Warner to not be swayed by the right-wing media mogul. Murdoch's attempts to grow his influence in the media landscape have always been cause for concern, and we made it a part of our mission to keep his newest power grab in check, cautioning against a future where Fox News-like networks monopolize the free and diverse flow of information in our news. If successful, this merger would have given Murdoch control of 40% of the US cable market and 30% of the movie market. After reports that Murdoch had pulled his offer, the *New York Times*, *Politico*, *Broadcasting & Cable*, and other prominent outlets highlighted the influence of our campaign.



The Political Research Engine of the Opposition

Defeating Trump, Regaining Power

American Bridge will cement itself as the standard-bearer of opposition research, build on its role as a progressive clearinghouse for information that drives the narrative on Republican officeholders and candidates, and be at the epicenter of Democrats' work to regain power—starting in 2017 and building to 2020.

THE POLITICAL RESEARCH ENGINE OF THE OPPOSITION

COMPETITIVE ANALYSIS

Defeating Donald Trump requires preparation and focus.

No other progressive organization has the resources and assets that American Bridge has amassed over the past several election cycles to hold Trump, his administration, and the politicians who support him accountable.

Only Bridge stands ready with staff already hired, Trump's web of business ties mapped out, and a massive video archive at our fingertips.

There will be a need for progressive policy alternatives, but our focus at Bridge will be on real time political accountability. In this media environment, content is king and that's where the focus of Bridge remains.

A look at the analogous entities on the right further reinforces the need for our work. America Rising, which was modeled after Bridge, has become the unofficial research arm of the Republican Party. The group's 501(c)(4) arm, Rising Squared, has already begun promoting Trump's Cabinet picks.

Trump's campaign allies have also made public their plans to create a new nonprofit dedicated to enacting Trump's agenda. Trump campaign digital director Brad Parscale, who was reportedly empowered by Trump's son-in-law Jared Kushner to take charge, will head the entity.

The right will bolster Trump aggressively and deceptively. The campaign to stop him must be nonstop. At American Bridge, it has already begun.

OVERARCHING STRATEGY

As we move into our fourth election cycle, the vision of Bridge as permanent progressive infrastructure is coming to fruition. We are beginning to see the full value of our investment in researching and tracking candidates over multiple cycles.

With 20,000 hours of video, 289 candidate research books, and the largest available archive of Trump research in the Democratic Party, we are uniquely prepared to take on the Trump administration, defeat Republicans who enable it, and rebuild progressive power in the states.

Our new Trump War Room, launched within weeks of the election, is already scrutinizing the presidential transition and will vigilantly watchdog the personnel, policies, and practices of the administration.

Our purpose is to keep Trump unpopular and make it more difficult for candidates who support him to get elected in 2018.

“On the left, the dominant player is American Bridge.” —TIME Magazine

The mid-term map appears difficult for Democrats; damaging Trump in the next two years could change that.

Republicans running in 2018 (and 2020) will be plagued by what we are best known for: opposition research, video tracking, and rapid response. We will be involved in every competitive Senate race in 2018.

But we must expand beyond federal races; Democrats must build power at the state level. We have lost ground and our once-in-a-decade chance to redraw district maps is around the corner. That's why Bridge will continue to engage in gubernatorial races. And for the first time, we will participate in state legislature races.

Nearly 80 entities already use our content. Over the next four years, party committees, candidate campaigns, and additional in-state allies will use it, too.

But to fully realize the value of our content, we must dramatically expand its reach. A new, robust digital program will bring our content directly to voters, starting with those who voted twice for Obama, but switched in 2016 to Trump. We must win these voters back in 2020.

As we expand the scope and reach of our research, we must also improve the efficiency with which we do it. We will continue to develop campaign technologies that have made us an industry leader. And we will continue to reduce duplication and improve the quality of political research as we move to the local level.

We are in a state of emergency.

Our initial response has been swift and forceful. We expect results to follow suit.

TOP OUTCOMES

In the next four years, American Bridge is focused on achieving the following outcomes:

Defeat Trump either through impeachment or at the ballot box in 2020.

Change the balance of power by measurably impacting US Senate, gubernatorial, and state legislative races.

Free ourselves from solely relying on the press. Our robust digital program will reach voters directly online.

DROVE COVERAGE THAT LED TO TRUMP ENTERING OFFICE AS THE LEAST POPULAR PRESIDENT-ELECT IN MODERN HISTORY.

While the dynamics of the election overcame Trump's sky-high negatives, the groundwork we laid will be critical to delegitimizing Trump as president. Bridge drove 673 stories throughout the campaign exposing Trump's unstable temperament, scam-filled business record, history of sexual abuse and misogyny, and racist behavior. As he enters office, he is the most unpopular president-elect in modern history.

THE AMERICAN BRIDGE PLAN

American Bridge is the Democratic epicenter of opposition research and rapid response in presidential and Senate elections. In the Trump era, there must be no “off years.” American Bridge will sustain a nonstop campaign against Trump, his administration, and Republicans who enable him.

This is how we will do it:

STATE-OF-THE-ART TRUMP WAR ROOM

With 20,000 hours of video and audio footage at our fingertips (including nearly 2,000 hours of Trump material) and massive, fully searchable databases of investigative knowledge on Trump’s business dealings and lawsuits involving him, our war room is already putting these assets to work in the following ways:

VETTING NOMINEES

American Bridge has already set up a world-class vetting operation, the largest in the Democratic Party, to investigate the records of potential Trump nominees. More than 1,200 positions require confirmation by the US Senate. We will home in on the 100 most important positions, focusing on those who stand to have the greatest impact on our progressive values in areas of women’s health and reproductive freedom, workers’ rights, climate change, and the treatment of immigrants and people of color.

While Democrats’ position in the minority makes blocking nominees difficult, we believe some of his nominees are so extreme that there will be the opportunity to do so. Where we cannot block nominees, we will use the process to highlight their most egregious past statements and professional dealings to make their confirmation process as difficult as possible and further erode Trump’s credibility.

The same holds for Trump’s appointees to the Supreme Court. Republicans set the tone for Supreme Court obstruction through their treatment of Merrick Garland. Bridge will expose their extreme issue positions, records, and backgrounds and equip Democrats in Congress, progressive partners, and the press with our research in real time.

EXPOSING CONFLICTS

Donald Trump enters the White House with significant conflicts of interest, unprecedented both in number and extent compared to any other president-elect in our history.

The US intelligence community has confirmed that Russia intervened in the election to help Trump win and the president-elect has already appointed individuals with strong ties to Russia and Putin to some of the most powerful positions in the US government. Meanwhile, Putin-tied Trump campaign staffers Carter Page and Paul Manafort appear poised to continue to leverage their connections to Trump as he takes power. American Bridge has, and will continue to, help uncover details of Trump’s affection for Russia and Putin (which appears to be driven at least in part by Trump’s business interests), including video of his Secretary of State pick Rex Tillerson receiving the “Russian Order of Friendship” medal from Putin in 2013.

**20,000+ hours of
video and audio**
footage stored in our state-of-the-art vault

We are tracking Trump's foreign and domestic business partners, existing construction projects in foreign countries, and potential negotiations on future projects that he could use to put personal profit ahead of our national security.

Trump's massive corporate and personal debts take on new meaning when he's in charge of regulating financial markets. He owes debt to banks he will regulate, including Deutsche Bank, Ladder Capital Finance, Amboy Bank, and nearly a dozen others. There is also strong evidence that he broke the Cuban embargo at a time when it was a serious federal crime.

With so many opportunities for foreign governments and corporations to gain influence over Trump, American Bridge will use every means at its disposal to hold Trump and his administration accountable—including FOIA requests, lawsuits, and regulatory complaints. As the progressive movement's political research clearinghouse, we will arm our allies to join us in taking on the administration through paid advertising, earned media, grassroots efforts, and legal recourse.

WATCHDOGGING THE AGENCIES

Often the most problematic scandals for any administration begin within the agencies. Trump's early nomination picks demonstrate that he will appoint people to run these agencies who are grossly unqualified. That, paired with the fact that he is considering gutting the bureaucratic staff, will make agency watchdogging even more important for this administration. American Bridge will have a dedicated team to monitor the activities of the executive branch for conflicts of interest, malfeasance, and incompetence. We will assign individual researchers to specific executive branch agencies, including the IRS, Justice Department, HUD (given its interactions with Trump's real estate empire), Defense, State, and others. Specific interest will be given to the various federal incentives and grant programs and the dissemination of government contracts.

FIGHTING THE TRUMP AGENDA

American Bridge's Trump War Room will also have a team dedicated to monitoring Trump's issue agenda and its potential negative impacts, especially on working families, women, the environment, immigrants, and people of color. As the Trump administration attempts to privatize Medicaid, revoke protections for immigrant families, give massive tax breaks to the very wealthy, eliminate Obamacare, defund Planned Parenthood, and let oil companies wreak havoc on our environment, American Bridge will be there to shine a light on the real-world impacts on regular people. We will curate information from policy think tanks, news reports, and our own original research and disseminate easily accessible fact sheets to progressive partners, the press, and voters themselves.

TIME CAPSULING TRUMP TESTIMONIALS

Much of the paid communication this cycle centered on criticism of Trump and his temperament. But one underutilized tactic was sharing testimonials of people who have experienced Trump first-hand. Trump and his ilk successfully intimidated and silenced many of these critics. American Bridge will give them a place to turn. We film those who want to tell their stories on camera, and provide a space for those who fear going public to tell their stories in a confidential manner. We will use some of these stories in real time—and catalogue all for use in paid communication for 2020.

“American Bridge has a mission for 2017: Hold Donald Trump accountable.”

—McClatchy, December 6, 2016

OPPOSITION RESEARCH AND CANDIDATE TRACKING

American Bridge will make running as a Republican candidate in the next four years painful. We will not only damage Trump, but also the candidates who enable and support him. American Bridge will use its full research, video tracking, and rapid response capabilities to drive messages about Republican candidates that will change the narrative in their races and help secure victories for Democratic candidates.

2,228,190 miles driven and
24,507 events covered by video trackers

SENATE

We plan to be involved in every competitive and potentially competitive Senate race in the coming cycle. Democrats are expected to have 23 seats up for election, along with two independent Senators who caucus with Democrats. Republicans are expected to have eight seats up for election. Taking into account seats that will likely be safe for one party or the other, we project that American Bridge will work in 16-20 races.

Democratic incumbents are on the ballot in nine states that Trump won including five that Republicans also won in 2012: Indiana, Missouri, Montana, North Dakota, West Virginia. Others include Florida, Ohio, Pennsylvania, and Wisconsin. The Virginia Senate race may also be competitive with Tim Kaine up for reelection. In these races, it will be critical to define the Republican candidates early so they are unable to capitalize on a political landscape that is favorable to their party.

Bridge has already begun research on known Republican Senate targets like Josh Mandel in Ohio and Dean Heller in Nevada. We have moved 10 trackers into key Senate states and will increase our tracking reach across the country beginning in April 2017.

We are also maintaining a presence and beginning research and tracking in states that may provide greater opportunity for Democrats this cycle than they have in the past, like Arizona where Republican Jeff Flake is on the ballot in 2018.

DERAILED RUDY GIULIANI'S CABINET NOMINATION.

American Bridge exposed Rudy Giuliani's business record and transnational conflicts of interest in news outlets like the *New York Times* (front page), the *Washington Post* and CNN. The *New York Times* subsequently reported that "the headlines about Mr. Giuliani's business interests bothered Mr. Trump." Giuliani later withdrew his name from consideration.

18,000+ stories

placed based on Bridge research since 2011

GOVERNORS

Electing governors in 2018 is the first concrete step

Democrats can take toward having a bigger say in the next redistricting process, and opportunities for pickups are widespread. As *Politico* recently reported:

“Twenty-seven of the 38 governorships up in 2017 and 2018 are Republican-held, including many seats that will be open after eight years of GOP control. That means widespread opportunities for Democratic gains, as well as a critical chance for new ideas and new blood to emerge as the party seeks to identify its next generation of leaders.”

In 2017, Bridge will produce research and tracking for the Virginia and New Jersey gubernatorial races. We are already ahead of the game in Virginia since we produced a research book on Republican Virginia gubernatorial candidate Ed Gillespie when he ran for US Senate in 2014. We have also begun research on Prince William County Supervisor Corey Stewart and State Senator Frank Wagner. We have moved a tracker into New Jersey for the gubernatorial race and have begun research on Assemblyman Jack Ciattarelli, Lt. Gov. Kim Guadagno, and Assembly Minority Leader Jon Bramnick.

In 2018, Republican governors like Scott Walker, Charlie Baker, and Bruce Rauner are among our targets. We will also engage in the Florida gubernatorial race, a critical state for Democrats in this cycle and future elections, as well as the Nevada and New Mexico races, which represent promising opportunities for Democrats this cycle.

Due to the overlay of targeted Senate and gubernatorial states, Bridge will track in many gubernatorial races even in those where we may not be as heavily invested in the race.

STATE LEGISLATURES

Progressives have long discussed the importance of state legislative races because of their impact on state legislative agendas as well as redistricting for 2020. However, with redistricting just four years away, these discussions have led to little in the way of concrete plans or action. Now these state legislative battles are even more critical. Due to poor performances in 2014 and 2016, we must rebuild our bench for state and federal races for 2018 and 2020.

Over the next cycle, American Bridge will leverage its infrastructure and expertise into the arena of state legislative races. We will create pilot programs in key states where we can engage in our core competencies—research, tracking, and rapid response—and impact the outcomes of races. Bridge will choose to operate in states where a) Democrats are in the minority by a narrow margin in the state legislative chambers, b) redistricting is critical, and c) our progressive partners are most engaged.

DROVE UP THE KOCH BROTHERS' NEGATIVES.

American Bridge led the way for Democrats to fight the Koch brothers' influence and money. Working with Senator Harry Reid and partners airing TV ads, we created a war room that leveled sustained attacks on the Koch brothers, making their negative ratings spike and turning their advocacy into a liability for candidates they supported.

PARTNERSHIPS

Our impact increases with every partnership. Candidates, party committees, and progressive allies put our content to work in paid and earned media, polling, and grassroots campaigns.

At the center of the resistance, we expect our partnerships to grow significantly—particularly as we engage at the state level.

In its earliest days, Bridge provided research exclusively on the “independent-expenditure” side to Priorities USA, Senate Majority PAC, EMILY’s List, NextGen Climate Action, the AFL-CIO, SEIU, AFSCME, Planned Parenthood, League of Conservation Voters, and others. That research was used as the foundation for polling and paid media efforts in presidential and Senate races.

In 2016, Bridge took its role as a research clearinghouse to the next level by expanding the content we provide to “coordinated side” campaigns and political parties, further maximizing efficiency and reducing duplication of work by Democratic groups.

As we look to 2018 and 2020, we will further increase our impact by building new partnerships with state parties, local candidate campaigns, and state allies.

DIGITAL PROGRAM

We know that voters are consuming information in a drastically different way than they have in the past and that they often distrust the traditional news media as sources for information. For most Americans, Facebook is their source for news. In 2017, we will invest in a new, robust digital program to bypass the press as gatekeepers and deliver our original research directly to voters.

We will initially focus on Obama-Trump voters in swing states. (Trump won more than 200 counties that Obama won twice.) By targeting these voters and testing their reaction to our content with a sophisticated public opinion research program, we can pave the way for Democrats’ strategy to win these voters back in 2020.

Our content will include visual guides to knock down Trump’s daily narrative, comprehensive research reports on Trump’s policy positions or key appointees, and video testimonials from Trump voters who face the worst impacts of a Trump presidency.

The right’s digital capabilities currently outpace our own. We will leapfrog Republicans, as we have before, by being smarter, faster, and more agile.

“American Bridge has become one of the left’s most innovative and successful ventures.”

—Newsweek, May 16, 2014

CAMPAIGN TECHNOLOGY

American Bridge places a premium on bringing technological innovation and creativity to opposition research and campaign communications. Over the past five years, we have developed:

- Live stream technology as part of our tracking program—allowing our DC-based staff to watch events we are tracking across the country in realtime and disseminate information to the press and public in a matter of minutes.
- Our “Vault”—a 16-terabyte, fully-searchable video archive (created in conjunction with a firm that recently commercialized a Defense Advanced Research Projects Agency (DARPA) development), built from monitoring candidate media appearances on national and local television and radio, as well as tracking public events.
- The “Vault” features a revolutionary “sound search” that allows audio and video searches without any pre-existing transcript. This technology indexes audio-visual materials by phonetic sounds, allowing us to find useful tidbits of information buried within our video collection. Because the Vault is our sharing mechanism for groups that access our video database, progressive organizations also have access to this powerful search technology.
- An industry-first software system for managing the scheduling and record-keeping for our video tracking program.
- A first-of-its-kind customized database for creating and tracking public records requests that saves hundreds of researcher-hours each year.
- Top-of-class database of federal legislative history that makes generating lawmakers’ voting records simpler and more efficient.

As we move forward into a new era of government and political campaigns, Bridge staffers are already busy homing in on the next innovative step we can take to stay ahead of the competition. We are expanding our ability to live stream local events, monitor and record radio programming, and tap into podcasts that host Republican candidates and other tracking targets.

OPENED THE DOOR FOR UNEXPECTED DEMOCRATIC SENATE PICKUP IN INDIANA.

By delivering a major research hit against popular incumbent Senator Richard Lugar (he had not lived in the state for 35 years and had improperly charged taxpayers for hotel stays), Bridge helped to open the door for outspoken extremist Richard Mourdock to defeat Lugar in the GOP primary. Mourdock was as extreme as expected during the general election, most notably claiming pregnancy from rape was “something that God intended.” The rest is history. Democrats won a seat that few would have considered a possibility a year earlier.

289 research books

on Republican candidates, officeholders, and public figures

EVALUATION

American Bridge will constantly monitor the following indicators to know if we're on track toward our top outcomes.

Defeat Trump either through impeachment or at the ballot box in 2020. The number of stories and the value of TV time for anti-Trump media coverage we generate will break all internal records. Multiple Trump nominations will become a drag on his administration due to the research we unearth. Trump's approval ratings will remain historically low.

Change the balance of power by measurably impacting US Senate, gubernatorial, and state legislative races. Republicans will spend precious resources defending stories generated by Bridge in competitive races. Republicans will be forced to spend money in races that wouldn't otherwise be competitive due to Bridge's work putting them in play.

Free ourselves from relying solely on the press. Our robust digital program will reach voters directly online. Millions of people will see our content through someone they know (a friend or contact) online. Our own public opinion research will allow us to measure change in opinion among targeted voters who consume our content.

BUDGET AND TEAM

American Bridge's core budget is \$14.7 million in 2017. This budget represents both the work of American Bridge's 501(c)(4) and its Super PAC and covers a total of 146 staff.

The 501(c)(4) is creating a 47-person war room to take on Donald Trump with a staff of 25 researchers, a communications team of 16 which is feeding our work to the press and doing rapid-response, and a team of six media monitors. Bridge will also build out a robust digital program to deliver our content directly to voters. The total cost of the Bridge war room will be \$7.8 million in 2017.

The Super PAC will do research in 16-20 of the most competitive Senate races in the 2018 cycle with two Senate research teams of five people each. We will also do research in the seven most competitive gubernatorial races with two research teams comprising of nine people total. We will also hire 33 video trackers to be out in the states providing constant video tracking in all 20 Senate races, along with 16 total gubernatorial races. To enhance this tracking effort further and bring the information to voters and the press in real time, we also plan to invest to expand our use of live stream technology, and we plan to make new technological advances in our work, including radio and podcast monitoring. Lastly, we will also launch pilot programs to leverage our research and tracking infrastructure and expertise into selective state legislature races. The total cost of the work in the SuperPAC will be \$6.9 million for 2017.

SENIOR STAFF

Bradley Beychok, Executive Chief of Staff to the Chairman. Bradley has over a decade of experience managing political campaigns and progressive advocacy organizations. From 2012-2016, he served as President of Media Matters for America, the nation's leading progressive media watchdog, overseeing its \$11 million annual budget and team of over 70 people. Prior to that, Bradley served as Campaign Director and co-founder of American Bridge 21st Century PAC, the largest opposition, video tracking, and rapid response organization in Democratic politics. In 2012, *Campaigns and Elections* magazine named Bradley a "Rising Star," a select group of operatives who the magazine deems will have a lasting effect on the campaign world. A native of Baton Rouge, LA, Bradley began his political career working for the famed political consultant James Carville.

Jessica Mackler, President. Prior to joining American Bridge, Jessica spent nearly a decade working on the ground on campaigns across the country, including managing the 2012 Senate race in Nevada and serving as a top adviser to US Senator Mary Landrieu during her 2008 reelection campaign. In Louisiana, Jessica directed research and rapid response communications to help overcome a Democratic exodus from the state following Hurricane Katrina, a trend of GOP statewide wins, and a competitive opponent with statewide name recognition to win. Fittingly, Jessica got her start as a researcher at EMILY's List, rising through the ranks to become the Deputy Director of Research. She left EMILY's List to co-found what was then one of the only women-run opposition research groups, where she worked with a number of clients who helped Democrats regain majorities in Congress and governors' offices in the 2006 elections. For their efforts, Jessica's firm was named the "Rookie of the Year" by the American Association of Political Clients.

Eddie Vale, Vice President. Eddie is a veteran of Democratic and progressive politics and currently serves as Vice President of American Bridge. He most recently served as Communications Director for the AFL-CIO's Super PAC Workers' Voice and the health care organization Protect Your Care. He has also previously worked for the AFL-CIO, Progressive Media USA, John Edwards for President, Ned Lamont for Senate, and Spitzer for Governor, as well as multiple congressional races.

Our Impact

CREATED THE PIVOTAL MOMENT AGAINST TODD AKIN TO SECURE A DEMOCRATIC VICTORY IN A RED STATE.

It was an American Bridge tracker who first identified Akin's "legitimate rape" comments, after the interviewer missed its significance. Drawing on our massive video archive, and innovative talking mailers sent to Missouri voters, we showed that Akin's extremism was not limited to a one-time gaffe.

CREW

est. 2003

America's Nonpartisan Watchdog Against Government Corruption

Combating Abuse, Ensuring Accountability

CREW will be the leading nonpartisan ethics watchdog group in a period of crisis with a President and administration that present possible conflicts of interest and ethical problems on an unprecedented scale. CREW will demand ethical conduct from the administration and all parts of government, expose improper influence from powerful interests, and ensure accountability when the administration and others shirk ethical standards, rules, and laws.

AMERICA'S NONPARTISAN WATCHDOG AGAINST GOVERNMENT CORRUPTION

COMPETITIVE ANALYSIS

The nonpartisan coalition that has driven good government reform for decades now finds itself outgunned.

Judicial Watch, the most frequently cited conservative watchdog organization, has a \$30 million annual budget. It consistently caused problems for President Obama and Secretary Clinton through aggressive Freedom of Information Act litigation and other lawsuits and a steady stream of reports and press outreach.

Donald Trump presents conflicts of interest and possible ethical problems on an unprecedented scale, and special interests are pushing to influence both parties in Congress. Yet Judicial Watch and similar groups (like Cause of Action and the Foundation for Accountability and Civic Trust (FACT)) have been conspicuously quiet.

Responding to this crisis requires an ethics watchdog with the credibility, resources, and willingness to hold Trump and his administration accountable.

Bolstered by bipartisan board leadership and a winning record even in the face of partisan gridlock, Citizens for Responsibility and Ethics in Washington (CREW) is positioned for this fight.

Now is the time to scale.

OVERARCHING STRATEGY

CREW knows how to use litigation, legal complaints, research, and press outreach to get results.

We must significantly ramp up to fill the gap in serious ethics analysis and legal accountability for the new president and the rest of the government.

Donald Trump brings with him massive global conflicts of interest and an apparent disregard for the traditions and rules aimed at protecting the government from improper influence.

To combat this coming ethics crisis, CREW will significantly enhance our capabilities to monitor conflicts of interest and executive branch ethics, use FOIA to effectively keep tabs on the activities of the administration and federal agencies, and take legal action including active litigation to bring about accountability when the law is broken.

CREW is not aiming to imitate Judicial Watch, but rather will establish itself as a credible but aggressive nonpartisan watchdog seeking accountability for ethical lapses and improper influence in the new administration. We welcome groups like Judicial Watch to join us in holding this administration accountable.

TOP OUTCOMES

If CREW is successful in causing Trump to behave ethically, it will help protect the country from scandal and disastrous policy choices. If Trump does not bow to this pressure, CREW will hold him accountable.

In the next four years, CREW is focused on achieving the following outcomes:

Trump will be afflicted by a steady flow of damaging information, new revelations, and an inability to avoid conflicts issues. For as long as Trump maintains the ethically untenable position of keeping his business empire in the family while serving as president, CREW will relentlessly probe his global conflicts of interest and administration ethics problems through aggressive use of research, open records requests, legal action, and FOIA litigation.

The Trump administration will be forced to defend illegal conduct in court. CREW will bring about legal accountability for executive branch ethical and legal violations through complaints and litigation. We will bring significant pressure on investigative agencies and Congress to investigate violations of law and the constitution, which appear likely to begin on day one of the Trump administration, and we will litigate wrongdoing aggressively, forcing the administration to defend civil lawsuits, FOIA litigation, and whistleblower suits.

Powerful industries and interest groups will see their influence wane. CREW will expose and curb the improper influence of powerful industries and interest groups on the administration and on both parties in Congress with successful legal complaints and litigation to rein in dark money, reckless campaign finance abuses, and the misuse of nonprofits by Trump and others.

Dark money will be a political liability in key states. CREW will make the use of dark money, campaign finance violations, and ethics abuses at the state level a major issue in key states that will be the focus of massive spending and attention in the lead up to 2018 and 2020 elections.

Responsible for more than 40% of the total fines given out by the FEC in 2016 and just about all of the fines levied in 2016 resulting from complaints by good government groups

Our Impact

EXPOSED TRUMP FOUNDATION'S ILLEGAL DONATION TO FLORIDA AG PAM BONDI, IGNITING A MAJOR SCANDAL.

CREW's initial IRS complaint against the Donald J. Trump Foundation for its \$25,000 gift in 2013 to a political organization associated with Florida Attorney General Pam Bondi was the first to connect the dots and expose a major Trump scandal. The money had been directed from Trump personally and illegally given from the foundation's funds. Our complaint generated investigations and stories by the *Washington Post*, *New York Times*, every major paper in Florida, and the *Wall Street Journal*, and still reverberates today.

THE CREW PLAN

CREW has been successful for more than a dozen years using legal complaints and litigation, in-depth research and Freedom of Information Act requests, and aggressive communications to shine a light on unethical conduct and improper influence. CREW was founded in part to fill the void in accountability and ethics enforcement as figures like Tom DeLay and Jack Abramoff ran amok in the early 2000s. In the ensuing years, CREW amassed successes both in exposing and curbing ethics abuses by both parties and in pushing to highlight and limit the corrupting influence of money in politics.

We now face a likely ethics crisis in the incoming Trump administration that is far greater in scale.

CREW must scale accordingly.

Here's how we'll do it:

NON-STOP WATCHDOGGING

CREW will quadruple the size of our research staff and more than double the size of our legal team to expand our capacity in the following key areas:

CONFLICTS OF INTEREST AND ETHICS VIOLATIONS

CREW has already been featured in coverage of Trump's conflicts of interest in every major national media outlet, and we worked extensively with the *New York Times* editorial board to condemn the utterly inadequate solutions Trump has proposed. New CREW Governing Board Chair Ambassador Norm Eisen and Vice Chair Richard Painter have been the faces of bipartisan outrage over this ethics crisis, appearing hundreds of times in major media outlets since the election.

Going forward, we will comprehensively monitor both the Trump businesses and the actions of the administration in order to detect and highlight all of the conflicts of interest that arise between Trump's massive global business interests and his actions as president.

Already, Trump's Cabinet picks and top advisers present more conflicts of interest and greater potential for special interest influence than those of any previous administration. We will monitor and highlight conflicts of interest and ethical violations by Cabinet officers, senior White House officials, and other senior appointees and influential advisors, including the Trump family members who appear poised to take on prominent roles.

INFLUENCE OF SPECIAL INTERESTS

CREW will comprehensively monitor the secret influence of powerful special interests on the Trump administration, including the heavy presence of executives from powerful industries, as well as lobbyists and other representatives of special interests in key administration positions.

“[T]he leading contender to assume the role of a liberal Judicial Watch is Citizens for Responsibility and Ethics in Washington, an organization founded in 2003 with an announced goal of rooting out government corruption.”

—*Politico* December 16, 2016

CREW “could set its own template for forcing lax federal regulators to crack down on campaign finance violations by the types of outside groups that have been awash in money since the Supreme Court’s 2010 Citizen’s United ruling.”

— Mother Jones

We will shine a light on the use of money by powerful groups to impact key issues. Our repeated complaints in 2015 and 2016 against the National Rifle Association, which consistently hid its political spending, and the Center for Medical Progress, a group that lied to the IRS about its agenda to attack Planned Parenthood, helped to define the public understanding of those powerful interest groups and ensure that their efforts to influence issues and policy were out in the open.

CREW will diligently monitor FEC and IRS filings of political organizations and campaigns; personal financial disclosures required for executive branch officials; responses to our many open records requests; and lobbying disclosure reports to shed light on ethics and campaign finance problems wherever they occur in the government and the political system.

CONGRESSIONAL ETHICS

CREW will keep highlighting congressional ethics violations, like our repeated complaints against Rep. Duncan Hunter for personal use of campaign funds, and exposing the influence of powerful interests on members. In 2016 we produced an extensive report on special interest funding of new members of Congress from both parties. In 2017 and beyond, we will expand on this type of research and ensure that congressional influence and corruption remain issues of great public concern.

CAMPAIGN FINANCE

The 2018 elections, particularly at the state level, will be hugely important as a potential response to and check on the Trump administration. CREW will play a significant role in monitoring campaign finance, special interest influence, and ethics in the coming state campaigns.

CREW will highlight the influence of special interests including the Koch brothers, ALEC, corporate interests, and others at the state level in order to inform voters of the forces attempting to influence them.

CREW will also continue to effectively expose and attack money in politics abuses including by exposing misuse of nonprofits for politics, such as the Trump Foundation’s illegal political contribution and campaign activity; obtaining accountability for dark money abuses, such as the FEC fines CREW obtained for three Koch brothers-backed dark money groups; and pushing for enforcement of dark money rules including in our litigation to get the FEC to enforce the rules against several conservative nonprofits.

WON GROUNDBREAKING DECISION AGAINST FEC FOR FAILING TO INVESTIGATE ILLEGAL POLITICAL SPENDING.

CREW filed Federal Election Commission (FEC) complaints following the 2010 election cycle against the American Action Network and Americans for Job Security, two nonprofit organizations with combined spending of more than \$175 million since 2009. They had spent millions of dollars on campaign-related ads, but failed to register as political organizations or disclose their donors as required by law. While the FEC’s Office of General Counsel recommended an investigation, the commission deadlocked, and CREW sued the FEC for failing to take action. Our lawsuit made national news when a federal district judge ruled in CREW’s favor in September 2016, directing the FEC to reconsider the case using a much broader definition for what constitutes a political ad. This decision will make it much harder for dark money groups to use technicalities to escape disclosing their donors and already appears to have reduced the number of sham issue ads run close to elections.

FREEDOM OF INFORMATION ACTION REQUESTS

CREW's expanded research and legal teams will dramatically increase its use of Freedom of Information Act (FOIA) requests, a powerful tool to uncover information behind secret processes and investigations. We will submit FOIA requests to uncover:

- Conflicts of interest and ethical and legal violations.
- Improper influence by lobbyists and special interests.
- Problematic secrecy in policymaking and enforcement (including inappropriate mixing of business interests and political considerations in decision-making).

A steady stream of open records requests will keep constant attention on Trump's unprecedented conflicts of interest, and we will press aggressively for investigation by Congress and law enforcement. When our requests are stonewalled, we will use comprehensive and frequent litigation to compel openness and responsiveness.

LEGAL COMPLAINTS AND LITIGATION

CREW uses cutting-edge litigation to push for accountability. We will use our expanded legal team to file complaints and lawsuits in the following areas:

- Violations of the law and the US Constitution, potentially including improper conflicts of interest, "emoluments," foreign corrupt practices, and other violations;
- Campaign finance violations as they will likely continue to emerge in connection with last year's presidential election and coming congressional and presidential elections;
- Ethics abuses in Congress and in congressional races in key states, where dark money will play a record-setting role;
- Misuse of nonprofits for politics, such as the Donald J. Trump Foundation and the foundation's illegal political activity.

More than 500
domestic media hits, 70 TV and
radio mentions (valued at more
than \$35 million), and fingerprints
on almost 100 major outlet stories
in September alone due to exposing
the Trump Foundation scandal

In every case, we will highlight abuses to press for investigations, encourage accountability, and take out wrongdoers.

PRO BONO ARMY

We will enlist an army of pro bono lawyers to help CREW take legal action to hold the new administration and others accountable for conflicts of interest, ethics abuses, and violations of law.

Already, top law firms and talented lawyers across the country, with specialties including civil litigation and FOIA, are volunteering to help with this effort.

CREW will organize this enthusiastic and capable cadre of lawyers to enable us to obtain more information about conflicts of interest, influence, and secret government action and to advance more legal theories and litigation approaches to ensure accountability for wrongdoing and violations of law and the constitution.

COMMUNICATIONS

CREW's communications team has worked effectively to expose ethical violations and money in politics abuses, sparking regular stories in the *Washington Post*, the *New York Times*, and the *Wall Street Journal*, among many others, and partnering with top reporters to move major stories forward.

In 2017 CREW will triple the size of our communications team, ramping up to spread the word about the incoming administration's unprecedented ethics crisis further and wider. We will build on our strong print media relations, and expand to become a regular source of information on broadcast and cable news and online.

Additional CREW staff will build a dynamic social media presence and dramatically increase traffic to our recently overhauled website.

We will also significantly expand our outreach to local media, ensuring that our work to shine a bright light on improper influence and unethical government reaches people where they live and where they get their news.

EVALUATION

CREW will constantly monitor the following indicators to know if we're on track toward our top outcomes.

Trump will be afflicted by a steady flow of damaging information, new revelations, and an inability to avoid conflicts issues. The press coverage we drive (both quantity and quality) of Trump's conflicts of interest and other ethics violations will break internal records.

The Trump administration will be forced to defend illegal conduct in court. The legal and administrative complaints CREW brings and the litigation we initiate and join to bring about accountability for administration conflicts of interest and ethical violations will result in: voluntary changes in behavior, government agency action to enforce the law or require compliance, court-ordered consequences for violations, and orders to disclose government information to the public.

Powerful industries and interest groups will see their influence wane. Our legal complaints and litigation will lead to fines and enforcement, abandonment of improper forms of influence and campaign finance abuses, court decisions enforcing the law on money in politics, and increased oversight and better rules from agencies and Congress.

Dark money will be a political liability in key states. CREW will generate state and local media coverage of ethics abuses and improper influence in selected states. Our legal complaints and lawsuits responding to state abuses will produce concrete results. And key local officials and groups will draw attention to ethics and influence issues.

"Congrats, @CREWcrew! Americans deserve light shed on the dark money polluting our democracy."

—Senator Sheldon Whitehouse on our successful efforts to have the FEC levy fines against three Koch brothers-backed dark money groups

BUDGET AND TEAM

CREW is a nonpartisan 501(c)(3) organization. CREW's 2017 budget is \$5.8 million which will double its size from 2016. The reason for this expansion is the enormous demands that will be placed on this organization this year. Judicial Watch which is CREW's analog in the Conservative movement has been spending an average of almost \$20 million a year since 2012 when President Obama was re-elected.

In 2017 CREW is planning to expand to a staff of at least 38. We will more than double the size of our legal team, and add to our research and communications shop (including web and social media). We will also expand our administrative and paralegal capabilities. The increased budget will also cover outside legal services, web and social media services, and research and investigative resources. Our expanded staff will allow for a comprehensive Freedom of Information Act team with litigators, researchers, a coordinator and a paralegal; an executive branch ethics team with dedicated lawyers, a business researcher, and an executive branch researcher; a state team with a dedicated counsel and specialized researchers; as well as expanded capacity in all aspects of the office, crucially including litigation.

SENIOR ORGANIZATIONAL LEADERSHIP

Noah Bookbinder, Executive Director. Following an extensive national search, CREW hired Noah as Executive Director in March of 2015. Noah formerly served as a federal prosecutor in the Justice Department's Public Integrity Section and as Chief Counsel for Criminal Justice of the US Senate Judiciary Committee. Before joining CREW in 2015, he served as Director of the US Sentencing Commission's Office of Legislative and Public Affairs, where he helped guide the commission on important policy decisions including its 2014 reduction of federal drug sentences. In his position as Chief Counsel for Criminal Justice of the Senate Judiciary Committee, he advised Chairman Patrick Leahy on a range of criminal justice issues including violent crime prevention, fraud, public corruption, and criminal justice reform, and helped manage communications during the confirmation hearings of US Supreme Court Justices Sonia Sotomayor and Elena Kagan. He has also served as a Special Assistant United States Attorney in Washington, DC, and as an adjunct professor at both Howard University and George Washington University Law Schools. Noah is a graduate of Yale University and Stanford Law School.

FORCED THE FEC TO IMPOSE LARGEST FINE OF THE POST-CITIZENS UNITED ERA ON THREE KOCH-BACKED DARK MONEY GROUPS.

In July 2016, the usually deadlocked Federal Election Commission acted on our complaint and imposed substantial fines on three organizations—the 60 Plus Association, the American Future Fund, and Americans for Job Security—for illegally failing to disclose the source of money earmarked for specific campaign advertisements. The money in fact came from an organization that was central to the Koch network at the time. The FEC's fine of \$233,000 was the largest of the post-Citizens United era, and represented 40% of the fines imposed by the FEC in 2016 (and almost all of the fines generated by complaints from outside organizations). Given that the FEC is an agency characterized by partisan gridlock and an inability to enforce campaign finance law, this was a breakthrough and a testament that CREW's groundbreaking research and legal work can push even the least functional government agencies to act.

Adam Rappaport, Chief Counsel and Assistant Director. Adam has worked at CREW since 2009 and recently was promoted to Chief Counsel and Assistant Director. Prior to joining CREW, Adam practiced law at Levine, Sullivan, Koch & Schulz, L.L.P., where he represented members of the news media in seeking access to government records and proceedings and defended them in defamation cases.

Before that, Adam served as a law clerk to Judge David G. Trager of the US District Court for the Eastern District of New York. Adam covered Congress for National Journal's CongressDaily and the States News Service before attending law school. He received his J.D. with honors from the University of Chicago and his B.A. from Wesleyan University.

Jennifer Ahearn, Policy Counsel. Jennifer has been CREW's Policy Counsel since 2015. Prior to joining CREW, Jennifer worked in the Office of General Counsel of the United States Sentencing Commission, where she led teams of lawyers and researchers advising the bipartisan Commission on issues like drug policy and human rights abuses, and advised the Commission's federal judges and judicial employees on complying with the Code of Judicial

Conduct. Before that, Jennifer served as a law clerk to Judge Thomas B. Russell of the US District Court for the Western District of Kentucky. Jennifer received her J.D. and LL.M. degrees from Duke Law and her B.A. from the University of Pennsylvania.

Matt Corley, Research Director. Matt is the Research Director at CREW, where he has worked since 2012. Before joining the CREW team, Matt worked as an Assistant Editor at the Center for American Progress, where he wrote for ThinkProgress and The Progress Report. Matt received his B.A. from Ithaca College and earned an M.A. in Political Science from George Washington University.

Jordan Libowitz, Communications Director. Jordan has served as CREW's Communications Director since 2015. A native of Philadelphia, Jordan previously worked on campaigns from Pennsylvania to Alaska. Prior to joining CREW, he ran a communications consulting firm specializing in nonprofits. Jordan received his B.A. from the Johns Hopkins University.

Stuart McPhail, Litigation Counsel. Stuart has served as CREW's Litigation Counsel since 2015. Prior to joining CREW, Stuart worked as a litigation associate with Gibson, Dunn and Crutcher LLP and, before that, Paul, Weiss, Rifkind, Wharton and Garrison LLP. Stuart clerked with Judge Fortunato Benavides of the US Court of Appeals for the Fifth Circuit and with Judge Maxine Chesney of the US District Court for the Northern District of California. Stuart received his J.D. from Columbia Law and his B.A. and B.S. from the University of Maryland.

21 complaints

filed in 2015 and 2016 with the IRS, the FEC, and the Department of Justice against nonprofits for illegal political activity and lying to the government

FORCED DISCLOSURE OF MYSTERIOUS \$1 MILLION CORPORATE DONATION TO A NJ DEMOCRATIC SUPER PAC.

In February 2016, CREW brought a complaint against Coalition for Progress, a New Jersey Democratic super PAC backing Jersey City Mayor Steven Fulop for his widely expected gubernatorial run, when a mysterious shell company funneled \$1 million into the super PAC the day after it formed. That money could not have so quickly constituted legitimate earnings by the company. This complaint became a major local story, covered by *Politico* New Jersey, the *Bergen Record*, and *NJ.com*, among others, and led to the secret donor revealing himself publicly in the summer of 2016. Ultimately, Fulop abandoned his gubernatorial run.

Shareblue

est. 2016

The Antidote to Breitbart

Emboldening the Opposition, Empowering the Grassroots

Shareblue will take back social media for Democrats. We will delegitimize Donald Trump's presidency by emboldening the opposition and empowering the majority of Americans who oppose him. Shareblue will be the dynamic nucleus of a multi-platform media company that informs, engages, and arms Americans to fight.

THE ANTIDOTE TO BREITBART

COMPETITIVE ANALYSIS

Progressive media platforms are not positioned for this fight. They influence mainstream media and political elites, but do not reach people where they are. They advocate for progressive issues, but avoid partisan combat.

The Trump campaign spoke directly to voters—and not just through Donald Trump’s Twitter feed. It used Facebook, and racist and misogynistic (often fake) news sites with massive followings, to take both his vitriol and his lies straight to the people.

Emboldened by Trump’s victory, this messaging apparatus, led by Breitbart, will only become more dangerous in the next four years.

Progressives need a media outlet with the power, influence, and reach to combat Trump and the media ecosystem he has emboldened.

Shareblue will become that outlet by differentiating itself in four key ways:

Willingness to engage in partisan combat. We are not waiting to see what Trump does in office. We do not give him the benefit of the doubt. He has told us what he wants to do to our country and we believe him. We dedicate every day to calling out Trump and all who cooperate with him (including Democrats who capitulate to this administration), and bolstering those who most effectively oppose him (including Republicans who rebel against his rule). We are bold, full throated, and we are not backing down. Authoritarianism, kleptocracy, cooptation by Russia, and white supremacy are well within our sights, and we must fight back.

Connection to grassroots. Shareblue does not rely on mainstream journalists to advance our message. We take it straight to our more than one million followers, who share it widely with their networks. Some groups created during the 2016 campaign appeared inauthentic and were avoided by grassroots users. In contrast, engagement with Shareblue content soared, and our following continues to grow.

Facebook native. Shareblue is a Facebook community first and foremost. We do not need to adapt to a new environment; we’re already where we need to be. Our team, and our audience, lives on social media. With some of the highest interaction rates of any mainstream or progressive political media site on Facebook and Twitter, we know what works on social and what doesn’t.

Emotionally resonant. Messaging based solely on facts doesn’t resonate with a broad audience. Connection and engagement on a personal and emotional level—specifically hope, happiness, or anger—drive success. Depression is a disincentive to shares and anything milquetoast is toxic to our position. Shareblue creates fact-based content that connects with our audience on a visceral, emotional level.

Over 1 million
Facebook followers

OVERARCHING STRATEGY

Shareblue is a digital attacker.

In year one, we've begun to take back social media for Democrats by creating some of the most widely shared content of the election cycle.

Going forward, we'll take share from like-minded but combat-averse digital competitors. Our relentless coverage of Trump models how to put him and his collaborators on the defensive, and keep his popularity low. By rewarding the fighters and nourishing the grassroots, Shareblue galvanizes the resistance to Trump and bolsters the morale of the majority of Americans who didn't vote for him. And we won't hesitate to call out Democrats who equivocate on Trump's dangerous policies or surrender to his bullying tactics.

Further, we'll take share from corporate media, who are—in the short time since the election—more concerned about losing access to Trump than covering him aggressively. If the mainstream media fails to hold Trump to account, increasingly frustrated Americans will turn elsewhere for news and opinion.

To compete with Breitbart and the right-wing media infrastructure that will do Trump's bidding, Shareblue must scale up from a Facebook native news site to a diversified media company, operating across platforms with varied and ever-growing content offerings and products.

Shareblue's aggressive strategy is to grow our audience, maximize impact, and scale to reach our potential as a profitable media company.

GROW AUDIENCE

Every data point demonstrates that Shareblue is growing its audience. Since July 1, there were 162 million unique viewers of our content, a 50% increase from the first six months of 2016. Daily average impressions have doubled since the first half of 2016.

Yet.

Every moment that we are not optimizing our audience behavior or building our databases is a loss that's greatly compounded over time. Like a 401K, the earlier we contribute to it, the greater the returns.

DROVE NARRATIVE-SHIFTING, NATIONALLY TRENDING HASHTAGS:

Our team has created at least 14 hashtags that trended nationally on Twitter—a clear demonstration of our capacity to reach millions and shape the national conversation. #WeWontBeErased and #HereIAmWithHer drew attention to the commitment, joy, and enthusiasm of Clinton supporters; #TrumpCouldSay and #JustImagineHillary spotlighted the false equivalency in media coverage between Trump's multitude of outrageous actions and statements, and Clinton's emails; #InterrogateTrump called on the Secret Service to investigate Trump's incitements of violence against Clinton.

Building on our highly engaged core, Shareblue will hyper-target active Democratic voters and Trump opponents who are likely to share our content and engage others. To reach the largest and most influential audience as quickly as possible, we will employ predictive analytics—a capacity we have in-house.

Reaching our potential audience, however, will require expanding beyond Facebook. While our Facebook presence is our greatest strength, it is also a vulnerability: We should not be wholly dependent on a third party platform. If Facebook makes changes to its algorithm, Shareblue's audience could drop precipitously.

Shareblue must arm itself against the whims of Facebook's algorithm by building our presence on other social platforms, and developing destination traffic for the site. We'll do this by expanding our content offerings to drive habitual viewing, superserving our most engaged users, and maximizing earned media to build the Shareblue brand.

MAXIMIZE IMPACT

In the 2016 campaign, American Bridge and Correct the Record relied on the mainstream media to get messaging and opposition research out, instead of going to the grassroots directly. Once they debunked a major story or hit (e.g., *Clinton Cash*, the *New York Times* bestseller that baselessly attacked the Clinton Foundation's donations and finances), they weren't able to disseminate information to the grassroots.

Shareblue is positioned to frame opposition research from American Bridge and other progressive groups, as well as leaks and intel from Democrats on House and Senate committees, in our signature punchy, emotive style—and disseminate it directly to our followers in a daily online persuasion campaign.

The right has done this effectively (though deceptively) for years. They have brought down progressive organizations and damaged Democrats. In addition, there has been an influx of Republican campaigns and candidates citing bogus news stories from online smear merchants such as the *Washington Free Beacon* or Breitbart in political ads and communication.

Now, we can use our own social media platform to both weaponize oppo research and perfect its delivery system to expose Trump allies and collaborators, and to damage Trump. We will aim to have our factual news stories repeated in Democratic communications and paid political ads.

Shareblue's leadership team has spent the last decade working to build various parts of the national progressive infrastructure. We have worked with the White House and Capitol Hill, on presidential campaigns and with virtually every major progressive advocacy group. We will leverage unprecedented access to decision-makers at every level of the Democratic establishment and progressive movement to break news and tangibly damage the Trump administration.

SCALE AS A MEDIA COMPANY

Shareblue occupies a unique place in the media landscape. As this primary platform grows in audience and impact, we'll leverage these assets appropriately to establish a powerful brand, generate revenue, and drive to financial sustainability. Reaching these goals is critical for talent recruitment.

**#2 Facebook
interaction rate
among major political news sites
during 2016 election cycle**

We'll burnish the Shareblue brand by expanding our presence on TV, increasing earned media, and with greater and more targeted outreach to influencers in media and politics.

We'll diversify content products to include email newsletters, podcasts, and discrete editorial and video verticals, all of which can be sponsored by strategic partners.

We'll expand on mobile platforms via apps.

“A necessary voice in a world teeming with conservative radio, television and internet outlets that fire up the Republican base.”

—Nick Merrill, in *New York Times* profile of Shareblue

TOP OUTCOMES

Young enterprising media outlets historically thrive when in the opposition (think Talking Points Memo and Daily Kos in the George W. Bush years). Now is the time to build Shareblue's audience and influence.

In the next four years, Shareblue is focused on achieving the following outcomes:

Shareblue becomes the go-to news outlet for grassroots Trump opponents.

Shareblue becomes the de facto news outlet for opposition leaders.

Trump allies are forced to step down or change course due to news we push.

Under pressure from Shareblue, Democrats take more aggressive positions against Trump.

Achieve financial sustainability while diversifying content offerings and platforms.

Top editorial and writing talent leave competitors to join Shareblue.

CREATED THE MOST SHARED POSITIVE CONTENT OF HILLARY CLINTON'S CANDIDACY.

Our most successful post of 2016, “Hillary Clinton is one of the most ethical (and most lied about) political leaders in America,” was shared over 800,000 times—almost double the *New York Times* editorial endorsing her. Additional articles were shared hundreds of thousands of times, including: “I was one of the most ardent Hillary haters on the planet... until I read her emails,” and “I published this photo of Hillary Clinton and the response was overwhelming.”

THE SHAREBLUE PLAN

In its first year, Shareblue proved it could engage millions of people with its content, impact the national conversation, and be a credible and valuable platform for Democratic allies and the progressive grassroots.

But at such an urgent, alarming time in our national politics, being good isn't enough. We must become the antidote to Breitbart.

Going forward, and to drive to our top outcomes, Shareblue must expand its editorial capacity; broaden and deepen its outreach to allies; upgrade our technology; and get on the path to sustainability as a business.

This is how we'll do it:

CONTENT

EXPAND EDITORIAL

Shareblue content is highly successful: Articles are often shared more than 10,000 times, and our average daily impressions are 2.1 million. Coming into 2017, we are publishing more content, more often, and under more bylines than at any point in our brief history. With an increase in production, our audience is growing: Users saw Shareblue posts 323 million times since July 1, a 50% increase from the first six months of 2016.

We must expand our editorial capacity, and recruit more full-time writers, beat reporters, and editors who create, deliver, and promote content up to our high standards and in Shareblue's signature style.

Across a noisy, disorienting, and fractured digital landscape, Shareblue's steady, resolute voice is urgently needed.

65 million
Facebook monthly
impressions

OUR EDITORIAL PRIORITIES INCLUDE:

- Calling out all signs of authoritarianism and kleptocracy. Championing voices who have been right to warn us.
- Nonstop coverage of the influence of Vladimir Putin and Russia on Trump and his administration.
- Exposing Trump as a weak, think-skinned "loser" vulnerable to goading.
- Relentlessly beating the drum that he has no mandate, lost the popular vote, and is the least popular president-elect in modern American history.
- Exposing the insidious role of Mike Pence, who is replicating the right-wing governance ideology he inflicted on Indiana.
- Demystifying Trump's "conflicts of interest" and calling them what they are: Subversions of the nation's interests.

- Spotighting the Trump administration's vast ties to white nationalists and the ways in which they explicitly empower white supremacy.
- Tracking and fighting back against odious GOP legislation in Congress.
- Following SCOTUS nominations/appointments/major cases.
- Morale-boosting coverage of the grassroots opposition and resistance efforts outside the Beltway.
- Positive coverage of Democrats who boldly call out Trump and aggressively work against him. Pressure on Democrats who consider giving him cover.
- Media criticism exposing mainstream journalists who normalize Trump, and championing those who hold him accountable.
- Fighting outrage fatigue.

AGGREGATE

With increased editorial capacity, Shareblue will expand our daily production by aggregating content. We will do this in two ways:

- An aggregation editor will look for content from across the internet, which informs and inspires our readers, and tracks with our editorial priorities.
- Build a proprietary algorithm that is specifically designed to amplify negative content for Trump and deliver positive content to bolster the resistance. Further, by pulling the most widely shared progressive content from the top 1,000 social media accounts, Shareblue's algorithm will not only aggregate, but drive news and opinion.

**Anti-Trump
Facebook videos
viewed 20 million+ times**

MORE VIDEO

While traditional 30-second TV spots were important in the 2016 campaigns, online videos regularly garnered attention and airtime from media outlets, and were shared across millions of screens in social networks. Trump's web videos were not highly produced, but were easily shared across Trump's social media platforms, which garnered large numbers of views and allowed him to target specific groups.

Shareblue's anti-Trump videos, optimized for mobile viewing and sharing, were viewed over 20 million times during the 2016 campaign. Democrats often struggle to convey facts in ways that can be easily understood. Shareblue specializes in

simplifying stories, facts, and data through videos, memes, and other highly shareable visual content.

In addition to our own rapid response videos (pairing TV clips with a strong message), Shareblue will also amplify grassroots, authentic video content (e.g., Pantsuit Flash Mobs that first appeared in New York during the campaign). These videos boost opposition morale, are widely shared, and garner positive media coverage. Through partnerships and joint ventures with grassroots organizations, Shareblue will ramp up its video production to maximize impact and grow our audience.

As we expand across social platforms, our approach to visual content will be tailored to each. For example, on Instagram Shareblue will produce a daily image—a chart, graph, photograph or gif—which tells a specific story that aligns with our editorial focus.

INVEST IN INVESTIGATIVE JOURNALISM

The Trump administration needs to be investigated. Since 2006, The American Independent has shined a national spotlight on important stories—or offered rebuttals of accepted narratives—that the corporate news media leave in the shadows. The American Independent searches for and exposes the underreported activities of conservatives, arming the public with the truths needed to hold individuals and groups responsible for actions or policies that run counter to the progressive agenda.

With the election of Trump and its implications for a free press, The American Independent's work is more important than ever. In 2017, working with Shareblue, The American Independent will award grants to top investigative journalists to cover, expose, and damage the Trump administration and its allies.

A few examples of The American Independent's victories exposing the conservative nexus of power in Washington include:

- "Company Town", a documentary film that tells the story of Crossett, Arkansas, pop. 5,500, a town literally poisoned by the greed of paper-processing company Georgia-Pacific, a Koch Industries subsidiary. "Company Town" premiered on June 7, 2016 at the Los Angeles Film Festival to a sold out crowd and was one of a few select films invited for a second screening. *Huffington Post* called it an "important film" that "exposes the horrific environmental impact that Georgia-Pacific, a Koch Industries-owned company, has had on the tightly-knit Arkansas community."
- A 2014 *Rolling Stone* profile of the rise of Larry Pratt, Executive Director of Gun Owners of America, which earned 570,000 unique visitors and three million page views and led to follow-up articles in the *New York Daily News* ("Gun Owners of America director would be 'kind of glad' if lawmakers feared violence from his organization") and *Roll Call* ("Maloney Calls for Investigation Into Threats From Pro-Gun Leader Larry Pratt").
- Delegitimizing Mark Regnerus's 2012 study accusing same-sex parents of being inferior to their straight counterparts. Subsequent attempts to use Regnerus's study in the Supreme Court and in state battles failed—because The American Independent's reporting had destroyed its credibility.

THE GO-TO DESTINATION FOR POLLING AND PREDICTIVE MODELING

People don't answer polls anymore. Response rates are down to 15% or less. That damages the quality of polls and we saw the results in 2016. As polling faces a response bias crisis, models that use alternative inputs will become more important in future elections.

LED THE CHARGE IN CALLING OUT SEXISM IN THE 2016 CAMPAIGN.

In the beginning of the campaign, Shareblue was the only Democratic political site to regularly call out sexism in the presidential race. Conservatives, the corporate press, and even some progressives fiercely attacked us for it. But by the final weeks of the campaign, both mainstream and progressive journalists could be found commenting on the pivotal role sexism played in the race.

Benchmark Politics is the only predictive model to include county-level demographic, economic, and polling data to make accurate predictions about elections. This local-level focus will make it possible for Benchmark to not only predict 2018 Senate races, but also House races. As Democrats work aggressively to pick up seats in the mid-terms and defeat Trump in 2020, Shareblue will become the most accurate and trustworthy destination for polling and predictive modeling.

Heralded as the “next Nate Silver,” Anthony Reed is the founder of Benchmark Politics and Shareblue’s exclusive polling and predictive modeling expert. Notably, Benchmark Politics was the most accurate election forecaster in the Democratic primaries—beating even Nate Silver.

Shareblue will utilize this data and modeling expertise to ensure maximum impact of our editorial mission. With these added capacities, we will be able to test which messages and content are most effective. Trump was deftly able to change the conversation when it wasn’t favorable to his terms. Therefore, we must be able to test in real time what is most damaging to him and his administration and then relentlessly pursue those angles and storylines.

OUTREACH

Shareblue’s allies know that our content gets shared widely, and they know that there is no other resource like us in the progressive infrastructure. The more Democratic and progressive organizations get to know us, and see our results, the more often they come to Shareblue with quality story ideas and exclusive content, and the more they share it with their networks.

But there’s much more work to do. To become the de facto news outlet of the opposition in the Trump era, we must invest significantly in marketing ourselves to the infrastructure and movement we exist to champion.

Shareblue will widen its outreach by developing strategic partnerships with Democratic allies, influencers, and progressive groups; we will be the go-to platform to amplify their campaigns and initiatives.

Shareblue will expand our reach on the Hill to solidify our relationships and influence within the Democratic Party. Looking to 2018, Shareblue’s social media platform will be increasingly critical to party messaging.

As Shareblue becomes the leading source of news of the opposition, we’ll regularly recruit Democratic officials, progressive leaders, and grassroots organizers to write op-eds for the site.

Shareblue editors and writers will do more appearances on TV and radio. Strengthening Shareblue’s brand in the media is essential to our growth strategy.

EXPOSED WHITE NATIONALISM AS TRUMP’S POLITICAL STRATEGY.

Shareblue was the first to call Trump’s full pivot to white nationalism, which we did several days before he hired Breitbart’s Steve Bannon. While some journalists noted that white nationalists seemed to be emboldened by Trump, we aggressively called out Trump’s explicit strategy: To foment a white nationalist awakening.

TECHNOLOGY

As a digital media company, Shareblue needs to be in the vanguard of new technology for both its operations and in how we deliver our content to our audience.

In 2017, Shareblue will explore a move to Medium, which would reduce costs, eliminate the need for server space, and shift responsibility to dealing with DDoS attacks elsewhere. Medium also provides a new and powerful channel for promoting our daily content.

It is well documented that the Trump campaign's digital team outperformed Democrats at every level. We must comprehensively understand the behavior of our audience, and use that data to hyper-target and expand it.

We'll do this in several ways:

- We'll start with our Facebook audience. Once we understand the behavior of our most valuable users (within and beyond Facebook) in greater detail, we can develop online look-alike models.
- Analyze the site: With regression models we can look at traffic sources; a social media analysis will reveal how well certain types of articles do when posted in various media sources; releasing particular articles in a controlled fashion will test time of day engagement levels, social media source, and topic.
- We will be able to learn which platforms and ad types are most effective at building membership, driving views on content, driving amplifiers to share content, etc.
- With a clearer sense of who our users are, we'll make better strategic decisions on monetizing options, the tools to do so, and build the foundation for a potentially valuable and marketable dataset.

**#1 Twitter
interaction rate**
among major political news sites
during 2016 election cycle

REVENUE

Impact and monetization are not mutually exclusive at Shareblue.

In the second half of 2017 we will move the focus to monetization with the goal of bringing in revenue in Q2 of 2018. Our strategies stem from our core competency: The ability to market content effectively in social media channels.

Sponsored content. Sponsored content is fueling the explosive growth of digital media platforms. These articles would be specifically written to promote businesses and organizations that fit our audience. This would primarily be a lead generation business paid through a CPA model. And we'll go beyond articles, and partner with progressive allies like EMILY'S List to produce video content.

Sponsored verticals. Shareblue can create verticals that can be sold to businesses and organizations that align with our editorial priorities, e.g., labor, environmental organizations, anti-corruption advocates.

Shareblue Premium. Subscribers pay for exclusive content, daily newsletter or other product. Think TPM Prime or Slate Plus.

Marketable dataset. Once we know our audience better, we will have the option of marketing this data to allies to help them grow their audience and impact as well. Shareblue will always safeguard the privacy of its readers.

Proprietary technology/premium experience. Subscribers pay a fee to participate in a Twitter-like environment for the opposition, free from conservative trolls and harassment. A powerful way of merging our connection to the grassroots with our platform.

Email leads. Monetizing traffic through sponsored actions, whereby a third party pays to place a petition on our site and then pays per email (\$1.00-\$2.00) for the output. We get to add these email lists to our database as well. Since Change.org shifted from only serving the left, there is a gap in the progressive landscape for email list generation.

Progressive products. In an increasingly high tech world, people seek things they can touch and feel. We could market products that align with our editorial mission and capture the emotion of the resistance. All potential products could be market-tested through our Facebook community.

Event marketing. As Shareblue's reach and impact increase, so too will the opportunity to extend the power of our brand. We'll develop event programming in major markets that features Shareblue editors, writers, and contributors, and generate revenue from paid sponsorships and/or consumer sales.

EVALUATION

Shareblue will constantly monitor the following indicators to know if we're on track toward our top outcomes.

Shareblue becomes the go-to news outlet for grassroots Trump opponents. Facebook engagement with our content doubles each year. Shareblue.com traffic also doubles each year. Twitter following increases 25% per year.

Shareblue becomes the de facto news outlet for opposition leaders. Democratic offices, campaigns, and progressive organizations will routinely pitch us stories, funnel us information, and share our content, and we'll measure ally engagement. Shareblue content will be used in paid political ads in television and digital mediums.

Trump allies are forced to step down or change course due to news we push. Intel and oppo given to us exclusively will become higher quality, with higher potential for impact, as our credibility and footprint grows.

Under pressure from Shareblue, Democrats take more aggressive positions against Trump. Democrats will echo the aggressive, emotive messaging Shareblue models and take action accordingly.

Achieve financial sustainability while diversifying content offerings and platforms. Set and meet revenue targets each fiscal year as editorial and reach expand. Find capital investors in Shareblue's new and expanding business.

Top editorial and writing talent leave competitors to join Shareblue. High quality, seasoned editors and writers at competing outlets increasingly follow Shareblue social media accounts, share our content, and repeat our messaging—until they realize Shareblue would make a better home.

BUDGET

Shareblue is an LLC which has a 2017 budget currently set at \$2 million, which covers 18 total staff, including six full-time content producers.

Our top priority is expanding editorial capacity, and, accordingly, Shareblue's budget is biased towards content creation. This year, we'll bring on an executive editor, two writers/reporters, a production editor, and increase our freelance writers budget by 50%. Alongside our editorial expansion, we'll begin to re-build our video content program with a part-time producer, and optimize our social media presence with a digital manager.

With an increase in the budget to \$3 million, Shareblue will be able to make necessary investments in 2017. An expanded technology team allows for a digital director to develop and execute social media and web growth strategies, along with a full-time developer and a designer.

We'll continue to expand our editorial capacity with two dedicated reporters (one for the progressive beat, and one for ethics/legal), and a full-time video department of two. And we'll be able to compete for top editorial talent. A product marketing manager will drive revenue through content sponsorships, email list monetization, and subscriber-model experimentation.

TEAM

Shareblue operates with a small but dedicated team, each of whom believes progressive values are worth fighting for every day. We're passionate about producing the highest quality content to inform, engage, and fire up our audience. And like our audience, we live on social media.

On the content creation side of Shareblue, the editor-in-chief works closely with her deputy editor, two senior writers, our exclusive polling and data strategist, and oversees a group of five freelance writers.

A director of outreach and IT manager round out the operations team.

SELECTED BIOS

Will Lippincott, Chief Operating Officer. Will began his media career in 1994 at *The New Yorker*, where he worked in advertising sales. From 1998 to early 2001 Will was publisher of *The New Republic* and led its re-launch before becoming publisher and business development director of BoozAllen's *strategy+business* quarterly. At both brands, Will was responsible for business operations, including advertising sales and consumer marketing, and for the development and execution of online content and revenue strategies. In 2004, Will co-founded Lippincott Massie McQuilkin (LMQ), a full-service

EXPLODED THE MYTH THAT THERE WAS "NO ENTHUSIASM" FOR HILLARY.

Drawing on polling data showing Clinton's supporters were more enthusiastic than her opponents', reports from the field, and inspiring photos of her passionate supporters, Shareblue relentlessly busted the pervasive myth that there was no enthusiasm for the first woman to be nominated for president by a major party.

literary agency that now represents more than 300 authors and estates. As an agent and talent manager, he developed a rigorous approach to securing publishing deals for prize-winning journalists and thought leaders whose ideas are catalysts for change in culture, politics, and business. Will has been a board member of Media Matters for America since its founding in 2004, and has served on the boards of American Bridge 21st Century and The American Independent.

Katie Paris, Senior Executive Adviser. Katie is a veteran of progressive infrastructure organizations and Democratic campaigns. She has worked with Shareblue since David Brock took it over in late 2015. Katie also serves as an adviser to Media Matters, which she helped launch as its first Research Director in 2004. Katie also helped launch Faith in Public Life, a DC-based strategy center that advances faith as a powerful force for progressive causes. When she's not doing politics, she helps inspire social sector leaders to build great organizations for greater impact through the Leap of Reason initiative.

Melissa McEwan, Editor-in-Chief. Melissa is a leading feminist writer who has spent more than a decade in progressive advocacy, having founded the political and cultural blog Shakesville in 2004. She has been with Shareblue since February of 2016. Melissa's work has appeared in a number of publications, ranging from *Geez Magazine* to *The Guardian*. She has long valued building relationships with other writers in the social justice sphere, and loves to mentor fledgling feminist writers, from building an audience to navigating the challenges of social media.

Anthony Reed, Polling and Data Strategist. Heralded as the "next Nate Silver," Anthony is Shareblue's exclusive polling and predictive modeling expert. He is the founder of Benchmark Politics, which was the most accurate election forecaster in the Democratic primaries (beating even Nate Silver). The Benchmark model uses advanced statistical techniques based on county-level data Anthony developed to successfully lower the murder rate in Baton Rouge, reduce mass incarceration in Louisiana, and improve student success in public universities.

Tommy Christopher, Senior Political Writer. Tommy is a liberal commentator and journalist with an extensive reporting background. He began his journalism career covering the 2008 presidential campaign for AOL, then went on to cover the White House for six years with PoliticsDaily, Mediaite, and The Daily Banter. Before entering journalism, Christopher was a health insurance consultant with extensive expertise in the field.