

Filing # 102047541 E-Filed 01/22/2020 02:42:36 PM

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA**

LARRY KLAYMAN, an individual
as a citizen and resident of Boca Raton, Florida

Plaintiff,

v.

COMMIE GIRL INDUSTRIES, INC.
D.b.a: WONKETTE
1001 South Main Street, Suite 500
Kalispell, Montana 59901

and

REBECCA SCHOENKOPF,
1162 S. Highland Avenue
Los Angeles, California 90019

Defendants.

COMPLAINT

COMPLAINT FOR DEFAMATION

Plaintiff, LARRY KLAYMAN ("Plaintiff Klayman") hereby files this action against Defendants COMMIE GIRL INDUSTRIES, INC. d.b.a: WONKETTE and REBECCA SCHOENKOPF for defamation, defamation per se, and defamation by implication. Wonkette is an internet-based publication of politics and news commentary apparently which publishes widely in this circuit and was purchased on or about January 3, 2017, by COMMIE GIRL INDUSTRIES, Inc., a corporation in Montana, but in any event operated by REBECCA SCHOENKOPF as its "Editrix." In support of his causes of action, the Plaintiff avers and alleges the following;

II. JURISDICTION AND VENUE

1. This is an action for damages in excess of \$15,000.00 but less than \$75,000 exclusive of interest, costs and attorneys' fees.

2. Venue for this action is properly in Palm Beach County, Florida, as Plaintiff Klayman is a resident of this county and judicial circuit and a citizen of Florida and the cause of actions damaged the Plaintiff in this county and judicial circuit.

III. PARTIES

3. Plaintiff Klayman has achieved through significant effort a professional reputation which the Defendants specifically intended to damage. Plaintiff Klayman ran for the U.S. Senate in Florida in the 2003-2004 election cycle in the Republican Party primary and began his legal career with Blackwell, Walker, Gray, Powers, Flick and Hoehl in Miami in 1997. Plaintiff Klayman is a private practitioner and attorney, public interest advocate, author, columnist and syndicated radio talk show who legally practices and publishes and broadcasts in this judicial circuit and nationally and internationally. His weekly show appropriately titled "Special Prosecutor with Larry Klayman" is a syndicated national radio talk show host on Radio America. He was also a candidate for U.S. Attorney for the Southern District of Florida in 1991. Plaintiff Mr. Klayman has continuously practiced law and engaged in other professional and personal endeavors in this circuit and Florida since December 7, 1977. He is a former federal prosecutor of the U.S. Department of Justice in its Antitrust Division having been on the trial team that broke up the AT&T monopoly, and the founder of both Judicial Watch and Freedom Watch. Plaintiff Klayman is also an author, columnist and syndicated radio talk show host, and a prominent figure in the conservative and related non-partisan libertarian movements in particular.

4. WONKETTE is a publication of and the trade name under which Defendants COMMIE GIRL INDUSTRIES, Inc. does business.

5. Defendant COMMIE GIRL INDUSTRIES, Inc. is a corporation organized under

the laws of Montana, of which Rebecca Schoenkopf is President and CEO.

6. The corporation Commie Girl Industries, Inc. has registered with the Secretary of State of Montana the "Business Name" of WONKETTE.

7. The corporation Commie Girl Industries, Inc. appears to have no actual offices or presence in Montana. The only address of the corporation is the address of many other companies, including the same suite number, most notably an incorporator and registered agent ALL DAY \$49 MONTANA REG AGENT LLC. The only phone number which is presently known is in Los Angeles, California.

8. WONKETTE is a publication of commentary on items in the news, almost entirely political by intentionally and persistently misrepresenting the actual facts of events in the news, and intentionally and persistently maliciously falsely describing persons in the news in a false light in order to boost circulation, readership and profits.

9. Defendant REBECCA SCHOENKOPF is an individual, natural person who is a resident and citizen of Los Angeles, California.

10. WONKETTE is also the trade name under which Rebecca Schoenkopf does business and publishes the news commentary at www.Wonkette.com.

11. WONKETTE's website name and address www.WONKETTE.com is registered only to REBECCA SCHOENKOPF as an individual, in her own name as a natural person and not in the name of any corporation.

12. Much of Wonkette's content is written by Ms. Schoenkopf, who has also written the same type of content under the pseudonyms COMMIE GIRL and KING OF YOU, separately from Wonkette.

13. On or about March 2, 2012, Rebecca Schoenkopf purchased WONKETTE¹ however the reports about the purchase do not provide details of the corporate form of the new ownership of the publication.

IV. GENERAL FACTS COMMON TO ALL COUNTS

Standing

14. Plaintiff Klayman has standing to bring this action because he has been directly affected by the unlawful conduct complained herein.

15. Plaintiff Klayman's injuries are proximately related to the conduct of Defendants.

16. Wonkette has persistently and regularly attacked the Plaintiff Larry Klayman evidencing a pattern of animosity and actual and constitutional malice to damage his reputation and good will professionally and personally.

17. In fact, Wonkette prominently asks for donations and does substantial business in this circuit and elsewhere nationally and internationally to support its operations. Its logo at the top of each page is:

Wonkette Proudly Supported by Readers Like You - Donate

18. A large part of the right column of the home page of Wonkette is taken up by another appeal for donations, asking not if people will give but how much they want to give to Wonkette.

19. Indeed, at the bottom of the article in which the Defendants defamed the Plaintiff, the Defendants published the standard message:

¹ See Matthew Fleischer, "Commie Girl is the New Wonkette," *Adweek*, March 2, 2012, ("Looks like, for the time being anyway, LA is the new home of Wonkette.") accessible at: <https://www.adweek.com/digital/commie-girl-is-the-new-wonkette/>

Wonkette is ad-free and NEEDS YOU to keep paying our writers and buying us our pixels by the barrel. If you are at all able, please click below!

20. Defendants had a keen understanding from their own reliance upon donations, which they solicit on a regular basis and thus do substantial and systematic basis in this circuit as well as throughout Florida and the nation.

Facts Pertaining to the First Defamatory Publication

21. On or about October 24, 2019, Defendants published an article written by Jamie Lynn Crofts, titled "You Know When You Wake Up Mad At Your Wife For Something She Did In Your Dream?"² This article is attached hereto as Exhibit 1 and its contents are incorporated herein by reference. (the "First Defamatory Publication").

22. The Defendants published in the article, "Empaneling fake grand juries is one of Klayman's favorite hobbies, after **sexual harassment** and filing bullshit lawsuits." (Emphasis added).

23. Defendants falsely and maliciously accuse and publish in this circuit that Plaintiff Klayman has committed sexual harassment, even going so far as to say that it was one of Plaintiff Klayman's "favorite hobbies." This is a provably, demonstrably false statement, as Plaintiff Klayman has never sexually harassed nor have been found to have sexually harassed anyone. Defendants appear to rely upon a non-binding report and recommendation authored by Michael Tigar, Anthony Fitch, and Mary Larkin - which is still subject to appeal - as Defendants provide a link to this report and recommendation (hereafter "Hearing Committee Report") to the readers. *See infra* ¶ 47. In any event, the Hearing Committee Report **does not find that Plaintiff Klayman sexually harassed anyone** and thus Defendants, each and every

² Accessible at: <https://www.wonkette.com/you-know-when-you-wake-up-mad-at-your-wife-for-something-she-did-in-your-dream>

one of them, knew that their published statements were false and defamatory, or at a minimum acted with reckless disregard for the truth.

24. The Defendants also published in this article:

Oh good. Larry Klayman, walking proof that anyone can graduate law school and work for the United States Department of Justice, is back.

You may remember Mr. Superlawyer Klayman from some of his greatest hits, such as suing all the black people, trying to subpoena Bill Clinton's penis, and suing Robert Mueller, the DOJ, FBI, NSA, Jeff Bezos, and others on behalf of none other than Jerome Corsi.

In this week's edition of Florida Man Goes to Court, Klayman is both the plaintiff and the lawyer, so you *just know* it's going to be good.

This week, Klayman filed *Klayman v. Biden* against Joe Biden, Hunter Biden, the Biden campaign, and Biden campaign communications director and deputy campaign manager Kate Bedingfield for ... wait for it ... getting him kicked off of YouTube.

As with everything involving Larry Klayman, if you want to really understand it, you should probably huff a few sharpies first.

25. Defendants published the false statement that Plaintiff Klayman sued all black people, effectively publishing that Klayman is racist. Plaintiff Klayman did not sue all black people, and the statement is objectively false.

26. Defendants published the false statement that Plaintiff Klayman tried to subpoena Bill Clinton's penis, and the statement is objectively false. Plaintiff Klayman did not try to subpoena Bill Clinton's penis.

27. The Defendants further published in said article:

Unfortunately for Larry, the rest of the complaint (or a quick google search) reveals the truth. THIS GUY IS FUCKING BATSHIT.

Klayman is president, chief operating officer, chairman, and general counsel of Freedom Watch, an "organization" that exists mostly so Klayman has an outlet for all of his conspiracy fantasies. He has a podcast, YouTube channel, the works.

At the end of the day, Klayman is a grifter who screams his bigoted conspiracy theories at his computer to try to make money off of other white supremacists. And posting incoherent rants to YouTube is a big part of that. So when he was briefly kicked off of YouTube earlier this month, he was PISSED.

28. Thus, the Defendants falsely and without any basis published that the Plaintiff Klayman is a white supremacist, trying to make money off of "other" white supremacists.

29. The Defendants falsely published that Plaintiff Klayman is a grifter.

30. The Defendants falsely published that Plaintiff Klayman's presentations on his regular podcast "Special Counsel" as a lawyer are "incoherent rants."

31. The Defendants falsely published that Plaintiff Klayman's messages and efforts are "conspiracy fantasies."

32. The Defendants falsely published that Plaintiff Klayman is "batshit" meaning short for the saying "batshit crazy."

33. A "grifter" is a person who commits fraud, especially as a con artist.

34. The Plaintiff, who is of Jewish origin, is also not a white supremacist.

35. The Plaintiff is the only attorney in U.S. history to obtain a court ruling that a sitting president had committed a crime.

36. The Plaintiff is the only attorney in U.S. history to obtain a court ruling that a U.S. government surveillance program of domestic communications violated the U.S. Constitution, resulting in a nationwide injunction against the National Security Agency.

37. The Plaintiff uncovered and exposed the illegal sale of seats on U.S. Commerce Department international trade missions in return for the quid pro quo of campaign donations to

the presidential campaign Clinton / Gore '96.

38. These are just a few examples that Plaintiff's demonstrated results and victories in court have proven that Plaintiff's messages and arguments are not "incoherent rants" nor "conspiratorial fantasies."

39. Demonstrating actual malice, the Defendants had actual knowledge before publishing their article that Plaintiff Klayman of the false published statements at issue and alleged in this complaint.

Facts Pertaining to the Second Defamatory Publication

40. On July 26, 2019, the Defendants published the article written by Rebecca Schoenkopf, "Imagine if Your Stalker* Was Larry Klayman."³ This article is attached hereto as Exhibit 2 and its contents are incorporated herein by reference (the "Second Defamatory Publication"). This article is linked by Defendants in the First Defamatory Publication.

41. The article cites and links directly to the Hearing Committee Report of the Ad Hoc Hearing Committee in *In the Matter of Larry E. Klayman*, which is authored by Michael Tigar, Warren Anthony Fitch, and Mary C. Larkin.

42. This entire article by Defendants is devoted to misrepresenting the Hearing Committee Report and views and deliberations generally of Michael Tigar, Anthony Fitch, and Mary Larkin in crafting, writing and issuing their Hearing Committee Report in an attempt to severely and maliciously defame, smear, and harm Plaintiff Klayman's reputation and good will.

43. The headline in said footnote links to a footnote:

*Nota bene, Wonkette believes that Sataki's fleeing Klayman's car and seeking refuge from his rage and unwanted advances shows that Klayman's behavior qualifies as "stalking," per the Department of Justice, which defines it as "engaging in a course of conduct

³ Available at <https://www.wonkette.com/imagine-if-your-stalker-was-larry-klayman>.

directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress." Go sue someone else, LARRY.

44. In this article, the Defendants published false and misleading statements about the Plaintiff including:

Could he help it if it he fell so deeply in love with her that he couldn't concentrate on her actual case because he was too busy declaring his love for months on end, and flipping out at public events if she talked to other people, and chasing her into a hotel women's room when she jumped out of his car and fled into the hotel for safety? They call the women's room the "Klayman Room" now, he joked, because of all the remorse he did not have for a solid year of [sexually] harassing his client who was already having a nervous breakdown about her previous sexual harassment case.

45. In this article, the Defendants further published about the Plaintiff:

Well, nobody ever said Superlawyer Larry Klayman is good at "lawyer."

46. In this article, the Defendants further published about the Plaintiff:

But it *seems* like those would make Klayman -- who is currently representing such luminaries as Jerome Corsi and Laura Loomer as well as convening a "citizens grand jury" to indict and arrest Robert Mueller -- bad at his chosen profession.

47. Defendants have knowingly, intentionally, deliberately, and falsely attacked Plaintiff Klayman's qualifications and abilities to practice his profession as a lawyer, knowing that these attacks were false and misleading and with a reckless disregard for the truth.

48. These false and misleading factual publications are carefully and maliciously calculated to damage and injure Plaintiff Klayman's goodwill and reputation both personally and professionally.

Defendants Acted with Actual Malice

49. Defendants acted with actual malice when they published the above defamatory

articles because they knew or had reason to know that what they published was false or entertained serious doubts as to the truth of what they published as well as acted with a reckless disregard for the truth.

50. Actually, Defendants entire insidious business model is to perpetrate actual malice in defaming people with whom Rebecca Schoenkopf has a political difference of opinion for “fun and profit.”

51. WONKETTE was founded in 2004 as part of Gawker Media, which was found liable for the defamation of Hulk Hogan in a jury verdict awarding \$140 million to Hulk Hogan, resulting in a settlement on appeal of \$31 million against Gawker and the bankruptcy and closing of Gawker Media.

52. Wonkette's initial editor was Ana Marie Cox, a former editor at www.Suck.com [sic], claiming to publish " daily comically cynical commentary."

53. Rebecca Schoenkopf's biography published at WONKETTE is: "Rebecca Schoenkopf is the owner, publisher, and editrix of Wonkette. She is a nice lady, SHUT UP YUH HUH. She is very tired with this fucking nonsense all of the time, and it would be terrific if you sent money to keep this bitch afloat. She is on maternity leave until 2033." ⁴

54. For sales of her book Commie Girl in the OCP such as at Amazon.com, Rebecca Schoenkopf provided for her biography published with advertisements for the book: ⁵

"Whether working her way through a syphilis scare or puzzling in vain over the philosophical conundrum of taking Arnold Schwarzenegger seriously, Commie Girl finds the inner solidarity to hoist the red [communist] flag everywhere it isn't welcome. And the ferocious gaiety with which she defends herself from the Versace-decked, HumVee-crashing, Chardonnay-addled denizens of the USA's ultimate evil

⁴ accessible at: https://www.wonkette.com/u/rebecca_schoenkopf

⁵ accessible at: <https://www.amazon.com/Commie-Girl-OC-Rebecca-Schoenkopf/dp/1844672581>

paradise will draw gasps of astonishment and admiration from all those who think it really can't be that bad."

55. And Ms. Schoenkopf further added on the advertisement page for her book:

About the Author: Rebecca Schoenkopf, 'the queen bee/black widow of alternative journalism' (*Orange County Register*), is a multi-award winning writer and broadcaster, and founder of the Commie Girl Collective at www.commiegirlcollective.com.⁶ She lives in Orange County.

56. Notably absent is any information in her biography about education or training that would qualify Ms. Schoenkopf to understand, analyze, or critique legal matters, lawsuits, or the actions of lawyers.

57. Defendants published the both defamatory publications with actual malice by making a calculated decision not to verify their story because they knew or had reason to know it was false and misleading, but wanted to maliciously publish it anyway as it suited their communist agenda and their desire to make money off of the defamation of Plaintiff Klayman.

58. Defendants published both defamatory publications with actual malice by purposefully avoiding interviewing anyone who could contradict their story and that would have contradicted Defendants' preconceived storyline because it was false.

59. Defendants published both defamatory publications with actual malice when they failed to request a comment from Plaintiff Klayman or his representatives even though they knew that they would contradict the defamatory statements.

60. Defendants published both defamatory publications with actual malice by making a calculated decision not to seek meaningful comment from anyone who could provide a different perspective about the story.

⁶ Ms. Schoenkopf's use of www.commiegirlcollective.com appears to have lapsed, as it is now a Chinese-language news site focused on computer jobs and news.

61. Defendants published both defamatory publications with actual malice by failing to interview anyone concerning the articles and undertaking other reasonable efforts to disclose the truth.

62. At the time of the each of the two defamatory articles, Defendants knew that their statements were false, or recklessly disregarded the truth.

FIRST CAUSE OF ACTION
Defamation Per Se

63. Plaintiff Klayman repeats and re-alleges all of the previous allegations of the entirety of this Complaint with the same force and effect, as if fully set forth herein again at length.

64. Under Florida Law, “it is established...that an oral communication is actionable per se - that is, without a showing of special damage - if it imputes to another (a) a criminal offense amounting to a felony, or (b) a presently existing venereal or other loathsome and communicable disease, or (c) conduct, characteristics or a condition incompatible with the proper exercise of his lawful business, trade, profession or office, or (d) the other being a woman, acts of unchastity.” *Wolfson v. Kirk*, 273 So. 2d 774, 777 (Fla. Dist. Ct. App. 1973).

65. Defendants' malicious, false, misleading and defamatory statements were published on the internet in this circuit, domestically and internationally for the entire world to see and hear and specifically Defendants published these malicious false and misleading “facts,” *inter alia*, that Plaintiff’s conduct, characteristics or a condition is incompatible with the proper exercise of his lawful business, trade, profession or office.

66. Defendants, together acting in concert, jointly and severally, and individually, have defamed Plaintiff Klayman by knowingly, intentionally, willfully, and recklessly publishing statements about Plaintiff Klayman which they knew or should have known to be false and

misleading.

67. These false, misleading, and defamatory statements concerning Plaintiff Klayman are defamatory *per se* and they severely harmed and damaged Plaintiff personally and in his profession and business as a journalist and author, as they concern conduct and characteristics incompatible with being an attorney, journalist and author and accuse Plaintiff of moral turpitude and criminally most particularly through acts of sexual harassment.

68. Actual malice and damage is presumed by law when defamation *per se* is shown.

69. Defendants made and published false and defamatory statements concerning Plaintiff Klayman by claiming, representing and publishing within this district, the nation and the world, with actual malice, that Plaintiff Klayman was unsuited for his profession and committed the crime of sexual harassment, as well as demonstrated moral turpitude and loathsomeness.

70. Defendants' *per se* defamation concerning Plaintiff Klayman are so heinous and harmful that proof of their injurious effect is unnecessary and is thus presumed.

71. These false statements concerning Plaintiff Klayman, which Defendants published in this circuit, nationally and internationally, caused irreparable harm to him, his reputation and goodwill both personally and professionally.

SECOND CAUSE OF ACTION
Defamation

72. Plaintiff Klayman repeats and re-alleges all of the previous allegations of this entirety of this Complaint, including with the same force and effect, as if fully set forth herein again at length.

73. Defendants, together acting in concert, jointly and severally, and individually, have defamed Plaintiff Klayman by knowingly, intentionally, willfully, and recklessly publishing statements as set forth above about Plaintiff Klayman which they knew or should have known to

be false and misleading, or acted with a reckless disregard for the truth.

74. Defendants' two defamatory publications are not privileged in any way or manner.

75. To establish general defamation, a plaintiff need only show that a person or entity (1) published a false statement of fact; (2) about another person; (3) to a third party; and (4) the falsity of the statement caused injury to the other person.

76. The false, defamatory and misleading publications about Plaintiff Klayman were published and the falsity of the statements caused injury to him.

77. Defendants knew or had reason to know that their publications were false and misleading.

78. The false impression of Plaintiff Klayman, which Defendants created through these false and defamatory publications, caused irreparable harm to him, his reputation and goodwill both personally and professionally.

THIRD CAUSE OF ACTION
Defamation by Implication

79. Plaintiff Klayman repeats and re-alleges all of the previous allegations of the entirety of this Complaint, including with the same force and effect, as if fully set forth herein again at length.

80. Defendants, together acting in concert, jointly and severally, and individually, have defamed Plaintiff Klayman by knowingly, intentionally, willfully, and recklessly publishing statements about Plaintiff Klayman which they knew or should have known to be false and misleading or with a reckless disregard for the truth.

81. Defamation by implication is a tort recognized in Florida.

82. Defendants juxtaposed a series of facts so as to imply a defamatory connection between them.

83. Defendants, together acting in concert, jointly and severally, and individually, published false statements about Plaintiff Klayman and those statements were defamatory by implication in that they created a false impression of Plaintiff.

84. Defendants, together acting in concert, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

85. A reasonable person would understand Defendants' statements to put the Plaintiff in a false light, which would be highly offensive to a reasonable person.

86. Defendants intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice as they are untrue or at a minimum demonstrate a reckless disregard for the truth.

87. The false impression of Plaintiff Klayman, which Defendants created through these false and defamatory publications, caused irreparable harm to him, his reputation both personally and professionally.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Larry Klayman prays for judgment against Defendants as follows:

- a. Awarding Plaintiff Klayman compensatory and actual damages including consequential and incidental damages greater than \$15,000.00 but in an amount less than \$75,000.00.
- b. Awarding Plaintiff Klayman's attorneys' fees and costs.

- c. Granting any further relief as the Court deems appropriate including preliminary and permanent injunctive relief.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all counts, as to all issues so triable.

DATED: January 22, 2020

Respectfully submitted,

/s/ Larry Klayman
Larry Klayman, Esq.

7050 W Palmetto Park Rd.
Suite 15-287
Boca Raton, Florida 33433
Telephone: (561) 558-5536
Email: leklayman@gmail.com

Plaintiff, Pro Se

NOT A CERTIFIED COPY

EXHIBIT 1

[FREEDOM WATCH \(HTTPS://WWW.WONKETTE.COM/TAG/FREEDOM-WATCH\)](https://www.wonkette.com/tag/freedom-watch)

[JUDICIAL WATCH \(HTTPS://WWW.WONKETTE.COM/TAG/JUDICIAL-WATCH\)](https://www.wonkette.com/tag/judicial-watch)




[JOE BIDEN \(HTTPS://WWW.WONKETTE.COM/TAG/JOE-BIDEN\)](https://www.wonkette.com/tag/joe-biden)

[JOE BIDEN UKRAINE \(HTTPS://WWW.WONKETTE.COM/TAG/JOE-BIDEN-UKRAINE\)](https://www.wonkette.com/tag/joe-biden-ukraine)

[JOE BIDEN CORRUPTION \(HTTPS://WWW.WONKETTE.COM/TAG/JOE-BIDEN-CORRUPTION\)](https://www.wonkette.com/tag/joe-biden-corruption)

You Know When You Wake Up Mad At Your Wife For Something She Did In Your Dream?

(<https://www.wonkette.com/u/jamielynnCrofts>) By **Jamie Lynn Crofts** October 24, 2019 01:35 PM

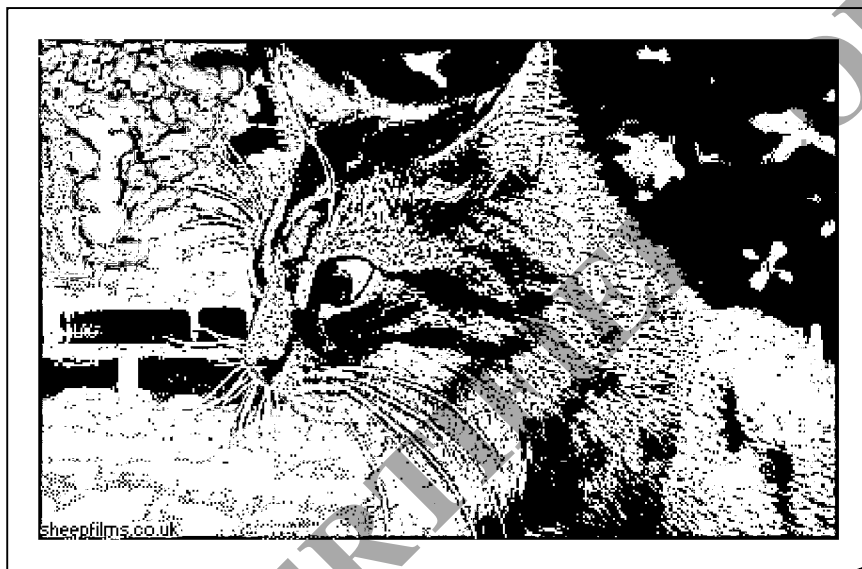
<https://www.wonkette.com/you-know-when-you-wake-up-mad-at-your-wife-for-something-she-did-in-your-dream/>   

Oh good. Larry Klayman, walking proof that anyone can graduate law school and work for the United States Department of Justice, is back.

You may remember Mr. Superlawyer Klayman from some of his greatest hits, such as suing all the black people, (<https://www.wonkette.com/wingnut-superlawyer-larry-klayman-to-sue-all-the-black-people-for-being-scary-and-mean>) trying to subpoena Bill Clinton's penis (

In this week's edition of Florida Man Goes to Court, Klayman is both the plaintiff and the lawyer, so you *just know* it's going to be good.

This week, Klayman filed *Klayman v. Biden* (<https://www.freedomwatchusa.org/pdf/191017-2019.10.17%20-%20Biden%20-%20Complaint%20LK%202.pdf>) against Joe Biden, Hunter Biden, the Biden campaign, and Biden campaign communications director and deputy campaign manager Kate Bedingfield for ... wait for it ... getting him kicked off of YouTube.



f t p t e

(<https://media2.giphy.com/media/bIPpTGDhn6hEI/giphy.gif?cid=2fb0ca761cb7bb46f48d8b69677871752ca73f112feedb4a&rid=giphy.gif>)


Yes, really.

As with everything involving Larry Klayman, if you want to really understand it, you should probably huff a few sharpies first.

Someone grab the popcorn

Saying that "he has been directly affected and victimized by" Joe Biden somehow managing to get him kicked off of YouTube (???), Klayman is suing the Bidens, et al., for tortious interference with his relationship with YouTube.

The way Klayman describes himself in the complaint is pretty adorable:

Plaintiff, Larry Klayman, is an individual and a citizen of Florida, as well as a former candidate for
Wonkette Wonkette Wonkette Donate (1st/Subscription) 
interest advocate and litigator, as well as a columnist, author and syndicated national radio talk
show host on Radio America, his weekly show appropriately titled "Special Prosecutor with Larry
Klayman." Plaintiff Klayman conceived of and founded both Judicial Watch, Inc. and Freedom Watch,
Inc. He is a former federal prosecutor of the Antitrust Division of the U.S. Department of Justice,
where he was on the trial team that broke up the AT&T monopoly.

No, that little thing about working for the DOJ Antitrust Division is not relevant to anything in this case. I think it was Klayman's attempt at making himself seem somewhat respectable to the court. Unfortunately for Larry, the rest of the complaint (or a quick google search) reveals the truth. THIS GUY IS FUCKING BATSHIT.

Klayman is president, chief operating officer, chairman, and general counsel of Freedom Watch, an "organization" that exists mostly so Klayman has an outlet for all of his conspiracy fantasies. He has a podcast, YouTube channel, the works.

At the end of the day, Klayman is a grifter who screams his bigoted conspiracy theories at his computer to try to make money off of other white supremacists. And posting incoherent rants to YouTube is a big part of that. So when he was briefly kicked off of YouTube earlier this month, he was PISSED.

As Klayman puts it in the complaint,

Plaintiff Klayman naturally benefits from this appearances on YouTube[,] which **enhances his good will and reputation** in his professional and personal capacities.

I would love to see the discovery on how Klayman's unhinged tirades "enhance his good will and reputation," but we're unlikely to see any of that, as this case should be immediately dismissed (and Klayman sanctioned).

The crux of this case is that earlier this month month Klayman's YouTube channel was suspended for two days.

What does this have to do with Joe and Hunter Biden, you may ask? Well, according to Larry,

This was done by YouTube as a result of undue and illegal political and other pressure and veiled threats from and exerted by Defendants, each and every one of them, working together in concert, jointly and severally.

Oh. Okay then.

If, at this point, you're wondering whether "Defendants, each and every one of them, working together in concert, jointly and severally" is a normal way for a lawyer to write, the answer is no, it is not.

Klayman's evidence for the Bidens' involvement in his YouTube suspension? Himself.

In an email to counsel for YouTube, Plaintiff Klayman correctly asserted that the suspension of
Don't (let/Subscribe) 
Wonkette Wonkette Wonkette
Klayman, of former Vice President Biden and his son Hunter Biden, regarding their apparent
Ukrainian bribery scandal.

Yes, Klayman is citing to an email that HE WROTE HIMSELF as evidence that Joe and Hunter Biden got him kicked off of YouTube.

He goes on:

Plaintiff Klayman was forced to threaten YouTube with litigation in order to have Freedom Watch's account restored on October 3, 2019, and in his correspondence with the legal counsel for YouTube **Mr. Klayman attributed** his broadcast statements about the Bidens, which had been posted on Freedom Watch's YouTube channel, as the reason for the suspension. In response, **legal counsel for YouTube neither directly nor explicitly denied Mr. Klayman's assertion, thereby confirming, validating and effectively admitting it.**

Riiiiiiight. YouTube's lawyer didn't want to waste time talking to Klayman about his conspiracy theory about why he got booted from YouTube, so *obviously* that's totally the same thing as admitting the Bidens were really behind everything!

But wait, let's keep reading. Not even Larry Klayman would file something so dumb in a court of law without-

HAHAHAHAHA sorry, couldn't finish that one with a straight face.

Anyway, apparently Kate Bedingfield of the Biden campaign slammed the *New York Times* for publishing an op ed by rightwing "journalist" Peter Schweizer, who's still arguing that the Bidens, and not the unhinged lunatic in the White House, did sketchy things in Ukraine. And somehow this means the Bidens are who got Klayman booted from YouTube.



(<https://media1.giphy.com/media/lkdH8FmImcGoylv3t3/giphy.gif>
cid=2fb0ca76e98274e0a55b57715420408c1d88ac22603a046f&rid=giphy.gif)

Yeah. I don't know, either.

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Klayman also complains about the fact that E-Zell tried to get a Trump ad removed from Facebook and Twitter, as if that is relevant to why he got kicked off of YouTube for two days.

These completely irrelevant anecdotes, according to Klayman, "evidenc[e] a pattern of conduct that is widespread."

And how does all of this connect? Well, according to Klayman,

Based on this pattern and practice, it is clear that Defendants tried to unduly and illegally pressure YouTube into suspending the Freedom Watch account, and succeeded in doing so, as a result of Plaintiff Klayman's criticism and statement that he would seek an indictment of the Bidens before a Freedom Watch citizens grand jury. The only difference is that YouTube succumbed to this pressure, while Facebook and Twitter correctly chose not to.



f t p t e s

(<https://media3.giphy.com/media/38fbIIrHLMPe/giphy.gif>)

cid=2fb0ca761d4647356295ea91694d89f0885e6ca907661a3b&rid=giphy.gif)

A "citizens grand jury," you say?

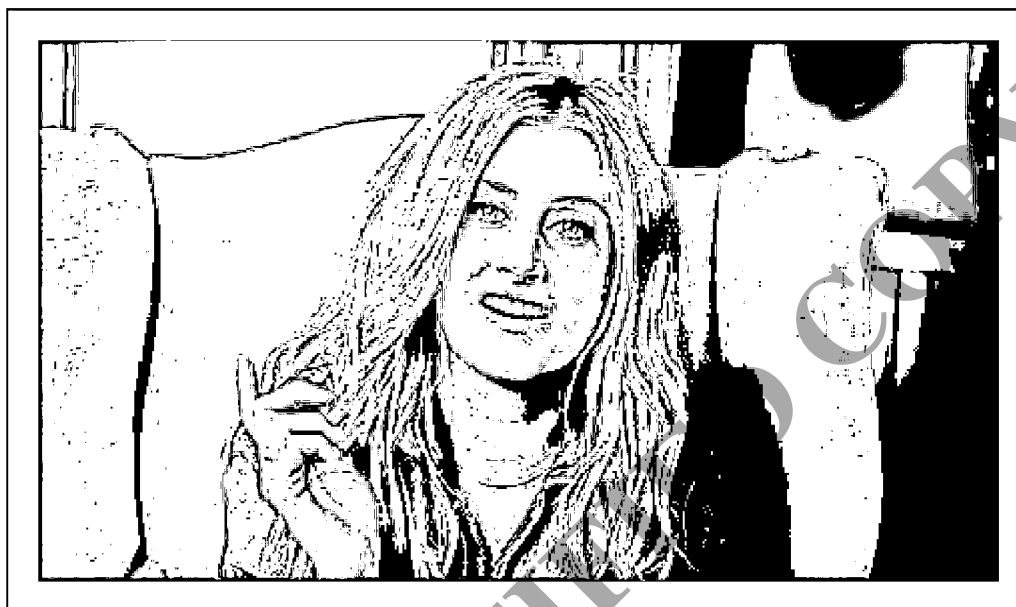
I would like to be as clear as possible about this: **A "CITIZEN'S GRAND JURY" IS NOT A THING OUTSIDE OF LARRY KLAYMAN'S WEIRD LITTLE MIND.**

In the United States of America here in 2019, only prosecutors can charge people with crimes. Only *actual* grand juries, empaneled by the government and bound by *actual laws*, can indict people.

Hanging out in some dude's basement while polishing off a 30-rack of Natty Light and screaming conspiracy theories and racial epithets is no more legally binding than a klan meeting.

At the end of their little soirée, Klayman and his buddies declare someone to have been INDICTED and a lot more research and effort.

When Klayman and another group of racist nutjobs "indicted" Obama back in 2012 (I guess they thought a sitting president could be indicted then -- I WONDER WHAT HAS CHANGED), they actually called themselves a "Super American Grand Jury."



(<https://media1.giphy.com/media/em9mkXhyevPO5sC2k9/giphy.gif?cid=2fb0ca763387f4fe4c34aa8b801f56173eac5f474faf808f&rid=giphy.gif>)

The "Super American Grand Jury" did not fool anyone with their name and were roundly laughed out of court (<https://www.snopes.com/fact-check/private-practice/>).

This is not the first time Klayman has declared himself in charge of a fake "grand jury." Empaneling fake grand juries is one of Klayman's favorite hobbies, after sexual harassment (<https://www.wonkette.com/imagine-if-your-stalker-was-larry-klayman>) and filing bullshit lawsuits. Klayman's fake grand juries full of sovereign citizen rejects have "indicted" Robert Mueller and John Roberts, for "ACA."

So this is all totally normal and very legally binding.

Also totally normal and legally binding is Klayman writing a piece for World Nut Daily (<https://www.wnd.com/2019/09/way-hold-bidens-accountable/>) (which apparently still exists!), announcing his plan to "indict" the Bidens.

So today, I, Larry Klayman, the founder of Freedom Watch and a former federal prosecutor, pledge to you with my sacred honor that our citizens grand jury will meet again in the next few weeks, and I, as the citizens prosecutor, will present evidence of the Bidens' crimes. We will then indict the Bidens, try them in a citizens court and have them sentenced. We the People will then seek to peacefully and legally enforce the sentences.

Klayman goes on:

The Bidens will be subpoenaed to appear to defend themselves at the eventual trial, and one can only wonder what will be their defense. ... But don't expect either of them to show up. These characters do not respect the rights of the American people, and they will attempt as usual to escape Lady Justice.

FIVE GUYS IN MAGA HATS HARASSING THE STAFF AT A WAFFLE HOUSE DOES NOT A GRAND JURY MAKE, LARRY.

In conclusion

Mr. Klayman, what you just said is one of the most insanely idiotic things I have ever heard. At no point in your rambling, incoherent response, were you even close to anything that could be considered a rational thought. Everyone in this room is now dumber for having listened to it. I award you no points, and may God have mercy on your soul.

[Complaint (<https://www.freedomwatchusa.org/pdf/191017-2019.10.17%20-%20Biden%20-%20Complaint%20LK%202.pdf>)]

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EXHIBIT 2

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Imagine If Your Stalker* Was Larry Klayman

(https://www.wonkette.com/u/rebecca_schoenkopf) By **Rebecca Schoenkopf** July 26, 2019 12:00 PM

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Superlawyer Larry Klayman is in a jam. There he was, just trying to do the right thing in helping out a woman who said she'd been sexually harassed at work. Could he help it if it he fell so deeply in love with her that he couldn't concentrate on her actual case because he was too busy declaring his love for months on end, and flipping out at public events if she talked to other people, and chasing her into a hotel women's room when she jumped out of his car and fled into the hotel for safety? They call the women's room the "Klayman Room" now, he joked, because of all the remorse he did not have for a solid

year of harassing his client who was already having a nervous breakdown about her previous sexual
h: *Wonkette Wonkette Wonkette* Donate (/st/ Subscriptions)
([https://assets.documentcloud.org/documents/6212992/7-24-19-Klayman-Hearing-Committee-](https://assets.documentcloud.org/documents/6212992/7-24-19-Klayman-Hearing-Committee-Report.pdf)



Report.pdf) that the lady must have made it all up because she thinks everyone wants her. What a crazy nutjob that lady must be! What a hysterical narcissist! Oh, there were letters, months and months of them, where he wrote down all his love for her and all his complaints about her lack of same? And he admitted his deep, otherworldly love for her in a deposition before his closing statement of "bitches be lying"? Well, nobody ever said Superlawyer Larry Klayman (<https://www.wonkette.com/tag/larry-klayman>) is good at "lawyer."

In 2010 and 2011, Klayman was representing Elham Sataki in her sexual harassment case against Voice of America. The DC Bar hearing committee found that, in the course of that representation, he violated eight rules of professional conduct in 14 different instances. Just little things, like "the worst case we have ever seen" of abusively haranguing a client for not loving him back, not following the client's instructions to "please don't sue Hillary Clinton over this, she has nothing to do with it" and "please don't move for Judge Colleen Kollar-Kotelly (<https://www.wonkette.com/tag/judge-colleen-kollar-kotelly>) to recuse herself by calling her an 'arrogant' and 'corrupt' Clinton lover," not keeping the client informed, and continuing to make motions after the client fired him. You know, picayune shit like that.

They're probably more like "suggestions" than "rules" anyway, right DC Bar hearing committee? No? Well, we are Not A Lawyer, and possibly Larry Klayman won't be soon either.

We can't speak to the section near the end of the report about "hey, did we mention that on top of the 'abusiveness' and 'self-pitying,' Larry Klayman is a jackhole who files nine-page single-spaced motions that are repetitive, rambling, and ELEVEN MONTHS LATE, and also he lies flagrantly about really disprovable things like whining that he was not ALLOWED to have discovery when the judge invited him to move for discovery and then he fucked off and never even did it but he still said he'd been denied discovery?" because again, we are Not A Lawyer. But it *seems* like those would make Klayman -- who is currently representing such luminaries as Jerome Corsi and Laura Loomer as well as convening a "citizens grand jury" to indict and arrest Robert Mueller -- bad at his chosen profession.

Still, in 185 pages, the *fucking gaslighting* in *one footnote* (yes we read the footnotes) was what got us most. First, the receipts, both in the form of depositions of Klayman and his former client, and long, incessant emails written not just to his client but also to the therapist she was seeing, whom his client had asked for help in getting Klayman off her jock:

It started with that he started getting upset why I'm not inviting him to the gatherings or to places. He would nonstop text or email, or phone calls, and talked to me that I talk about respect, that I'm not respecting him, and why I'm not taking him to the gatherings.

Then he explained his feelings to me and told me that he loves me and then he told me that he never loved anyone the way he loved me ever in his life and that nobody is going to love me the way he loved me, no other man can ever love me the way he loves me.

And so this was going on, and he -- and I through the whole time asked him to be my friend, but the most I can -- he's my attorney and the most I can do is a friendship, nothing more than friendship. Then he would lecture me on a friendship, what a friendship is, and then he would put lines of emails that a friend wouldn't do this or a friend wouldn't do that So, I -- the reason I couldn't, even as a friend, take him anywhere was because of his body language or the way he would look at me.

I was in a sexual harassment case and I couldn't have my attorney in public acting in the body language and the eye contact the way that people are going to say . . . "Oh . . . she has something going on with her attorney?"

Sataki sought help from her therapist, Dr. Aviera, in addressing the persistent harassment.

Ellie is more than important to me, as I have told you and her. I think there is a very beautiful side to Ellie and this has touched my heart, to understate things. . . . I have not helped her for money; I love Ellie; Ellie thinks that I am acting improperly like a "jealous boyfriend." I do not believe this to be true. . . .

Today, she called me about her case and the conversation unfortunately turned personal in part. I said to her that while we have no personal relationship, we are partners professionally and that we need to be considerate of each others' [sic] feelings. . . .

Ellie in my view is not capable of seeing the forest from the trees at this time. I discount a lot, but I am human and have feelings. Because I do care so much about Ellie, I too have trouble seeing the proverbial forest from the trees. Its [sic] very hard to be a lawyer and feel so much for your client. . . .

Ellie will not do anything with me on a personal basis (even watching a film on DVD) and makes up reasons, most of which don't make sense, why this is so. (She also tries to get rid of me as quickly as possible when I am in her presence). . . .

She shut the door to ever having a personal relationship with me. . . . Ellie is going through a difficult time I don't think Ellie can, because of her state, come to any conclusions on her own at this time as to why she and I are having problems, much more how we can together solve them. . . . I don't want to make her life more difficult, but only better. From the moment I met her, I wanted to see her happy. I knew that I had met a very special person.

Did he stop there? Have you met Larry Klayman?

On April 23, 2010, Respondent wrote to Ms. Sataki another long message, in which he stated, inter alia: When someone u deeply care for tells u stuff like, "you'll never be my Boyfriend . . . how would u feel? Last nite u did not respect me. You could have called me from the home of ur rich Persian family friend. I am very sad because I really do love u Ellie. . . . Its [sic] best for me and u that I get out of ur life in a personal sense. U would never want to be with a non-Persian anyway.

And more!

I never demanded that u love me. I never asked you for anything. It [sic] just that you keep u to love me. I am human. You are -- and this is not said for effect -- the only woman I've ever really loved. You know, when I walk down the street in Beverly Hills and see an attractive woman, my thoughts immediately flip to you. I see no one else. This has never happened like this with me before. This is, as I wrote in my book, by far the most important and personally rewarding thing I've ever done. My loving you has given me true meaning in my life.

That was a lot to read for this kicker, are you ready?

In response to Disciplinary Counsel's investigation of the issue, Respondent **denied that he sought a romantic relationship with Ms. Sataki**. DX 51 at 1-3; see also Tr. 1430. He suggested that **"she imagines that people are sexually coming on to her," "often claims sexual harassment" or "perhaps, she is just lying."** DX 51 at 3; Tr. 1424-33.

There are 183 more pages marshaling precise evidence of Klayman's ethical lapses, and his frightening behavior, and his ineptitude in the practice of law, which we have read so you don't have to. We look forward to his inevitable (and not the first)

(<https://ia801700.us.archive.org/14/items/gov.uscourts.flmd.282302/gov.uscourts.flmd.282302.39.0.pdf>, threat of a lawsuit for true and correct reporting on an official hearing into a matter in the public interest.

*Nota bene, Wonkette believes that Sataki's fleeing Klayman's car and seeking refuge from his rage and unwanted advances shows that Klayman's behavior qualifies as "stalking," per the Department of Justice, (<https://www.justice.gov/ovw/stalking>) which defines it as "engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress." Go sue someone else, LARRY.

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