

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION

MICHAEL T. FLYNN,
an individual,

Plaintiff,

v.

JIM STEWARTSON,
1526 Steinhart Avenue
Redondo Beach, California 90278-2746,
an individual,

Defendant.

Case No.: _____

COMPLAINT

**DEMAND FOR A JURY
TRIAL**

1. Defendant Jim Stewartson, who ironically gave himself the title of “anti-disinformation activist”, habitually defames Lieutenant General Michael T. Flynn (ret.) (“General Flynn”), a distinguished veteran who defended and protected Americans throughout his 33-year service in the United States Army.

2. Starting his career as a media and technology professional, Stewartson sought fame through the trend of defaming prominent conservative figures. One of Stewartson’s common targets is General Flynn.

3. Stewartson used his defamatory rhetoric to gain thousands of followers across several social media platforms and start his own podcast, where he regularly defames General Flynn, as well as other prominent conservative activists, to his thousands of listeners.

4. Stewartson also created a chat group, The Thinkin Project, where he allegedly combats what he calls “disinformation.”

5. Stewartson chooses to defame conservatives in an effort to make a comfortable living for himself.

6. In a malicious attempt to smear General Flynn—based on personal and political animus—and raise his own public profile as well as make money for himself, Stewartson spreads pernicious lies about General Flynn, including accusing him of committing treason and domestic terrorism, working for Vladimir Putin, being a Russian asset, stealing the 2016 election, working to overthrow the United States government, planning and executing a violent insurrection, being a leader of QAnon, being a Nazi, waging psychological warfare on the American people, wanting a second Holocaust, using ISIS radicalization techniques on the American people, torturing prisoners, and literally trying to murder former Vice President Mike Pence.

7. Stewartson’s lies are self-serving and self-promoting, as he has a financial interest in gaining publicity for his podcast. Accordingly, General Flynn seeks to hold Stewartson accountable for his malicious and knowing falsehoods.

PARTIES

8. Plaintiff Lt. General Michael T. Flynn, U.S. Army, Retired, is an individual who is a resident and citizen of the State of Florida, and resides in Sarasota County.

9. Defendant Jim Stewartson is an individual who is a resident and citizen of the State of California.

JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction over this cause of action pursuant to Fla. Stat. § 26.012 as it is a civil action with damages exceeding \$50,000.

11. Defendant is subject to personal jurisdiction in Florida, pursuant to Florida's long-arm statute, Fla. Stat. § 48.193, because a third party in Florida accessed the defamatory material and it was directed at a Florida resident.

12. Venue for this action is properly in Sarasota County, Florida as Plaintiff is a citizen of Florida who resides in this Circuit and Defendant's speech was directed at Plaintiff, causing Plaintiff damage in this Circuit.

FACTUAL BACKGROUND

Background of General Flynn

13. General Flynn dedicated his life to serving and protecting the United States. He served more than thirty-three (33) years in the United States Army, rising to the rank of Lieutenant General, and served as Assistant Director of National Intelligence in the Office of the Director of National Intelligence and as the 18th Director of the Defense Intelligence Agency.

14. General Flynn has become a staunch advocate for the preservation of American values and election integrity, and the fight against human trafficking. General Flynn recently began "The America Project," a non-partisan, social welfare organization defending rights and freedoms, election integrity, and border security.

Defendant's History

15. Defendant has had a long career working in media and technology. Most of his work involved graphic design, leading to several national and international awards.

16. With no awards for over a decade, Defendant chose to take a new path to regain public fame.

17. In May 2020, Defendant began obsessively Tweeting about General Flynn and digitally tracking his every move. In fact, Defendant recently stated that following General Flynn as “closely” as he does, gives him “access to content others miss.”¹

18. In August 2020, Defendant created a chat group called “The Thinkin Project.”

19. According to LinkedIn, it was a group “devoted to combatting disinformation and helping victims of undue influence.”²

20. According to VICE, Stewartson and a small group of allies formed a private discord server called The Thinkin’ Project and made big promises about how it would help people.³

¹ @jimstewartson, TWITTER (Jan. 11, 2022, 1:25 PM), <https://twitter.com/jimstewartson/status/1480969163929620480>.

² The Thinkin Project, LINKEDIN, 2023, <https://www.linkedin.com/company/the-thinkin-project/about/> (last visited May 2, 2023).

³ David Gilbert, *The Organization Trying to Save QAnon Believers Is Falling Apart*, VICE (March 17, 2021, 6:07am), <https://www.vice.com/en/article/v7mwya/the-organization-trying-to-save-qanon-believers-is-falling-apart>.

21. When VICE asked Desiree Kane, the group’s spokesperson and co-founder, to produce someone that The Thinkin’ Project has helped or to provide any information on how many people have been helped since the project launched, she was unable to produce anything.⁴

22. According to VICE, The Thinkin Project’s discord server focused “on the collection of disinformation, sharing of articles about QAnon and building resources to share with those who contact the group. There is no effort to intervene personally with anyone, or even speak to QAnon believers directly. Instead, those who get in touch are directed to a range of online resources with best practices about how to speak to someone who believes in QAnon.”⁵

23. Shortly after the 2020 Presidential Election, Defendant started a podcast called “Radicalized: Truth Survives Podcast,” with its first episode airing on November 15, 2021.⁶

24. Defendant’s podcast remains active, and, like his Twitter, Defendant repeatedly defames General Flynn. Defendant offers paid subscriptions for his podcast, ranging from \$5 per month to \$20 per month.

25. Defendant also posts defamatory statements about General Flynn on the social networks Mastodon and Substack, where he has paid subscribers.

⁴ *Id.*

⁵ *Id.*

⁶ Radicalized: Truth Survives Podcast, *Episode 1: Mind War, Crypto with Dave Troy, and Finding Shared Truth*, YOUTUBE (Nov. 15, 2021), <https://www.youtube.com/watch?v=o-bg2rgoSWA>.

26. Defendant’s defamatory statements about General Flynn have gained such publicity and become so outrageous that there is even an Urban Dictionary term used to define his followers called “StewAnon.” In the term, it describes Defendant as a “leftist conspiracy blogger.”⁷

27. Notably, even the Anti-Defamation League publicly stated that they found no information to support Defendant’s claims that General Flynn is the person behind QAnon.⁸

Defendant’s Repeated Lies about General Flynn

28. Since falling out of the public spotlight, Defendant sought publicity and financial gain by any means necessary, including by maliciously defaming General Flynn with incredible allegations that General Flynn has created cults and committed serious crimes against the United States. Among his many lies, Defendant has stated that:

- a. General Flynn is “running QAnon”;
- b. General Flynn “helped plan and execute 1/6”;
- c. General Flynn “work[s] for Putin”;
- d. General Flynn is a “Russian asset”;
- e. General Flynn is a “literal traitor”;
- f. General Flynn is a “terrorist”;

⁷ *StewAnon*, URBAN DICTIONARY (Jan. 5, 2023), <https://www.urbandictionary.com/define.php?term=StewAnon>.

⁸ Center on Extremism, *Antisemitism, False Information and Hate Speech Find a Home on Substack*, ADL (Apr. 3, 2023), <https://www.adl.org/resources/blog/antisemitism-false-information-and-hate-speech-find-home-substack-0>.

- g. General Flynn committed “treason”;
- h. General Flynn colluded with Russia to “steal the 2016 election”;
- i. General Flynn is a “Nazi”;
- j. General Flynn “wants a second Holocaust”;
- k. General Flynn uses “ISIS radicalization techniques” on the American people;
- l. General Flynn “torture[d] prisoners”;
- m. General Flynn tried to “overthrow the United States”; and
- n. General Flynn “literally tried to murder Mike Pence.”


29. The following is a non-comprehensive history of Defendant’s defamatory statements about General Flynn, in chronological order.

30. On May 4, 2021, Defendant Tweeted that General Flynn is working to destroy America on behalf of Putin:



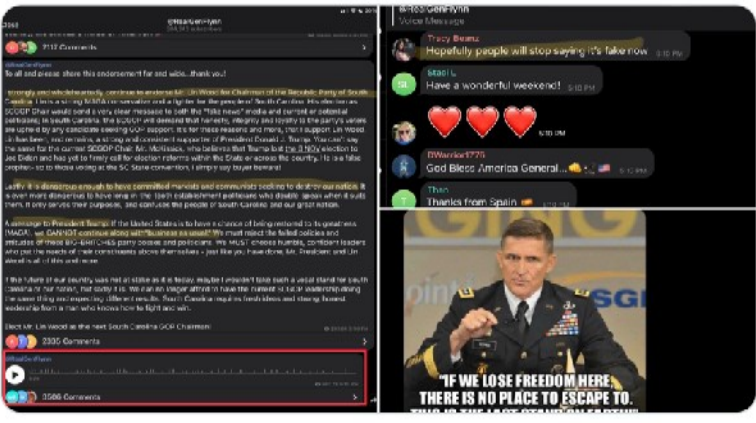
31. On May 15, 2021, Defendant made a slew of accusations against General Flynn, saying he is “running QAnon,” “made millions from QAnon victims,” and “helped plan and execute 1/6”:

Jim Stewartson, Anti-disinfo activist 🇺🇸 🇷🇺
 @jimstewartson

 I am so sick of this.

Lt Gen Michael Flynn (Ret):

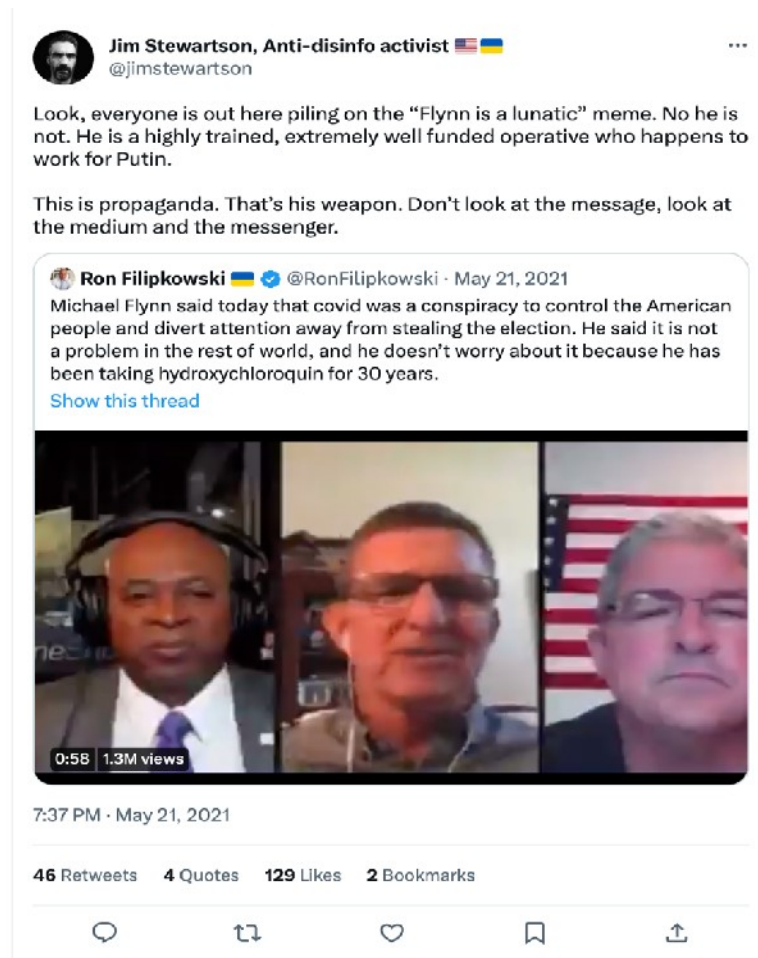
- Planned and executed QAnon
- Made millions from QAnon victims
- Hired Sidney Powell and Lin Wood with the money
- Conspired to militarize and radicalize QAnon
- Helped plan and execute 1/6
- Is STILL running QAnon 🗨️



11:53 AM · May 15, 2021

63 Retweets 7 Quotes 152 Likes 7 Bookmarks

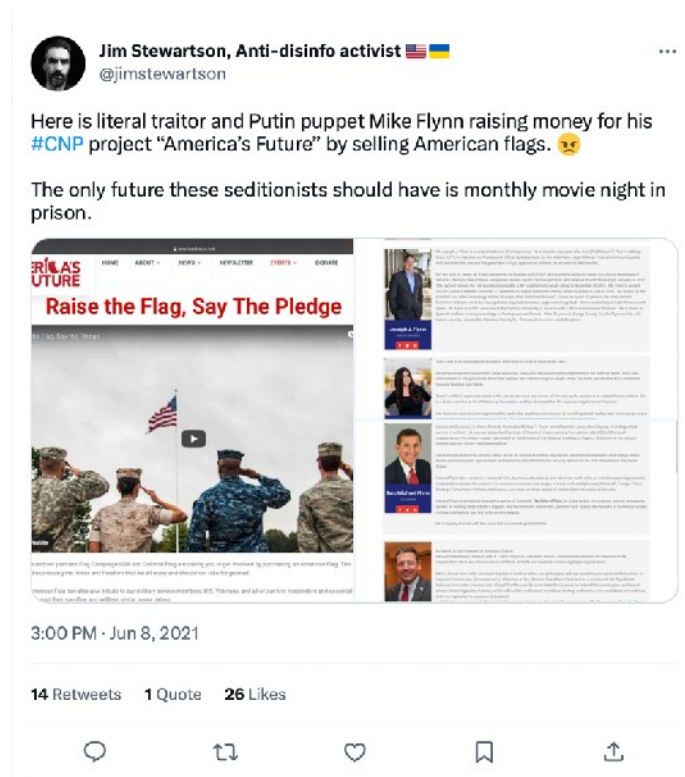
32. On May 21, 2021, Defendant stated that General Flynn works for Putin:



33. On June 1, 2021, Defendant again stated, “Flynn is in charge of it [QAnon].”:



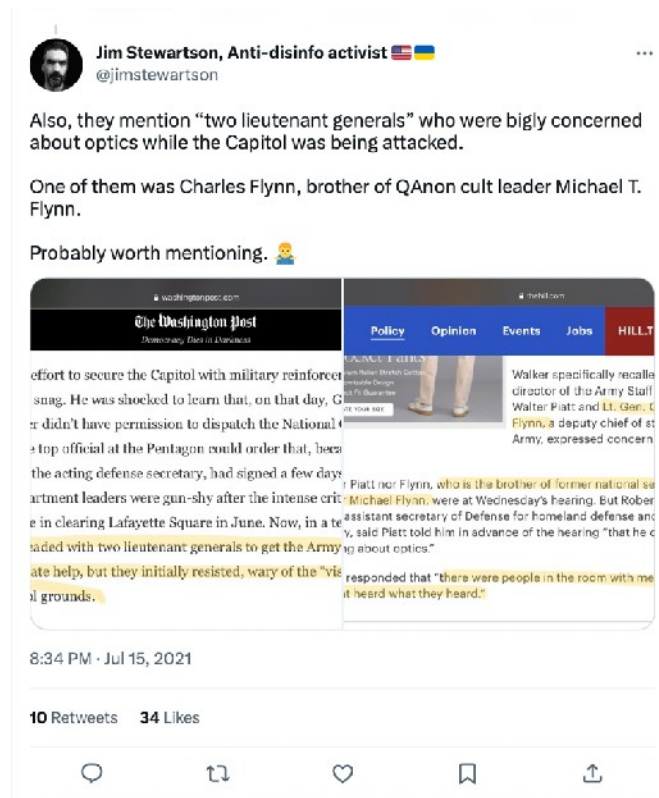
34. On June 8, 2021, Defendant described General Flynn as a “literal traitor” and “seditionist”:



35. Again, on July 12, 2021, Defendant referred to General Flynn as a terrorist:



36. Likewise, on July 15, 2021, Defendant again referred to General Flynn as a “QAnon cult leader”:



37. On August 20, 2021, Defendant stated that General Flynn “colluded with the Russians to steal the 2016 election.”:



38. On September 1, 2021, Defendant randomly accused General Flynn of being a “Nazi”:

Jim Stewartson, Anti-disinfo activist @jimstewartson

Here it is on Mike Flynn's channel which makes perfect sense because Mike Flynn is a nazi.

Jim Stewartson, Anti-disinfo activist @jimstewartson · Aug 26, 2021
And here it is. Great Replacement theory, an even bigger Big Lie that has been driving neo-nazis for many years but is getting mainstreamed now.

Reminder that "White Power Wilson" is following Mike Flynn and recruiting on his @telegram channel.
#ArrestMikeFlynn [twitter.com/jimstewartson/...](https://twitter.com/jimstewartson/)
[Show this thread](#)

@RealGenFlynn
<https://www.wnd.com/2021/08/welcome-1938-first-came-unvaccinated/>

White Power Wilson ⚡⚡
Jews in Russia owned the entire Bolshevist government and murdered 60 million white Christians. Czar Nicholas the Third was killed by Jews!

The lies about the Holocaust are so great. Read "Did six million really die?"

Jews own Pfizer
moderna
And Johnson and Johnson.

They want all white people dead this is why both parties promote multiculturalism in mass. All Jews promoted by AIPAC. 11:25 AM

Pee Jaayyy
Truth! We need to stand up now
Not true. Germans were the good guys in WW2. 11:26 AM

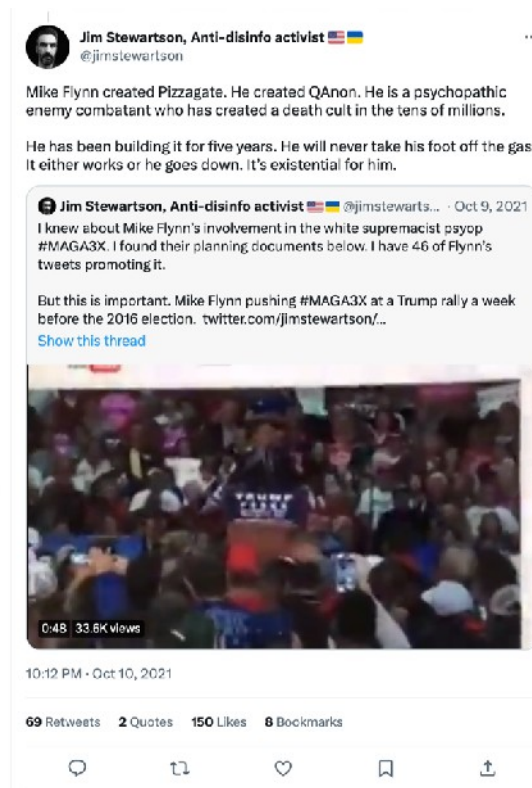
8:13 PM · Sep 1, 2021

12 Retweets 33 Likes

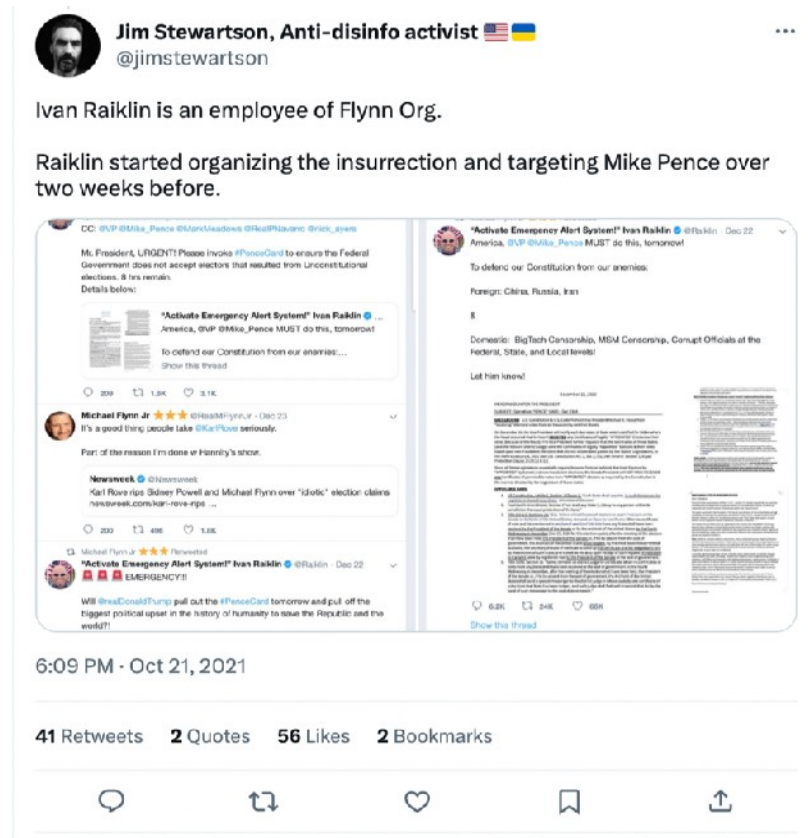
39. Later, on October 9, 2021, Defendant stated that General Flynn “has been operating QAnon” for nearly four years and that he uses it to “target people”:



40. The following day, Defendant again stated General Flynn “created QAnon,” and is an “enemy combatant”:



41. On October 21, 2021, Defendant called Ivan Raiklin an “employee of Flynn,” who started “organizing the insurrection”:



42. Later, on November 14, 2021, Defendant stated that General Flynn “works for a transnational crime syndicate” and “did a deal” with Vladimir Putin to put President Trump in office:



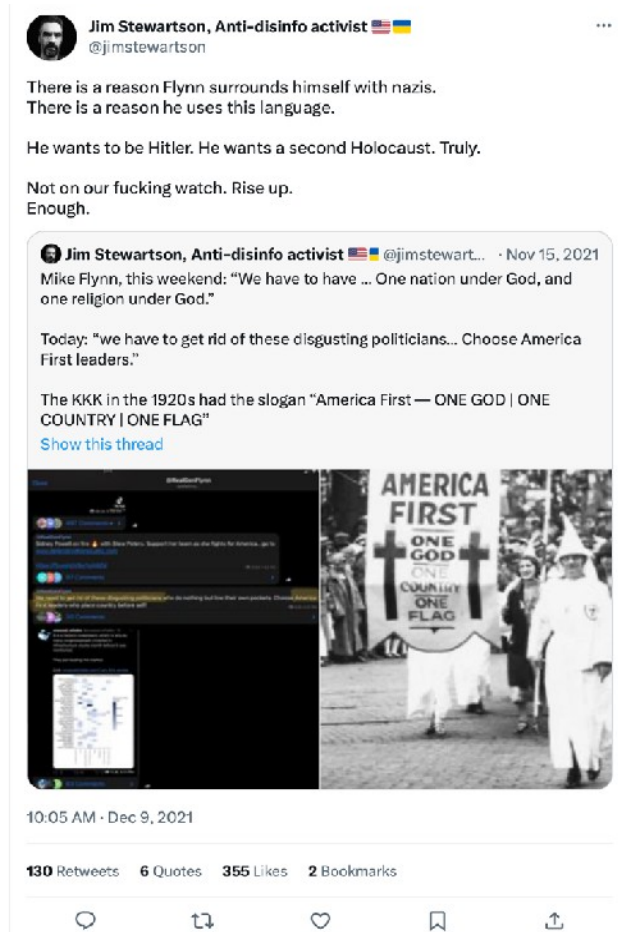
43. The following day, Defendant stated that General Flynn employed Tracy Beanz to run QAnon for him:



44. On December 3, 2021, Defendant again Tweeted, “Mike Flynn *created* QAnon”:



45. In perhaps one of Defendant's most egregious lies, he stated on December 9, 2021 that General Flynn "wants a second Holocaust." And to dispel any notion that he was being facetious, Defendant added: "Truly."



46. Right before the New Year, Defendant again stated, "QAnon is an invention of Mike Flynn.":



47. On November 8, 2022, in a delusional video, posted on his Substack and addressed to General Flynn’s brother, Joseph Flynn, Defendant lays out a few so-called “facts”⁹:

[A]bout 10 years ago, [General Flynn] decided to overthrow the government of the United States itself on behalf of an enemy foreign power, specifically, Vladimir Putin. In 2013, [General Flynn] allowed Edward Snowden to break into top secret DIA servers in order to share military secrets with the Russians, while at the same time Mike Flynn was at GRU headquarters. For the next six months, Vladimir Putin invaded Crimea without a single peep from [General Flynn] who was head of the DIA at the time. [General Flynn] allowed all of that to happen. And then he got fired for it. And that began a eight-year warfare campaign against the United States of America. In 2017, after [General Flynn] managed to steal the 2016 election and put a Putin puppet in power, he got caught, he got mad, and he psyop’d you and the rest of his family into his cult so he could start QAnon. . . . Is that really the side of history you want to be on—your brother’s attempt to recreate the Third Reich?

48. On January 10, 2023, Defendant tweeted, “Mike Flynn is Q,” referring to QAnon:



⁹ Jim Stewartson, *MindWar: The Psychological War on Democracy: Message for Joe Flynn*, SUBSTACK (Nov. 8, 2022), <https://jimstewartson.substack.com/p/message-for-joe-flynn>.

49. That same day, Defendant Tweeted that “Mike Flynn and Vladimir Putin agreed to wage psychological WWII on American citizens.”:



50. On January 17, 2023, Defendant stated that “Mike Flynn created ‘Q’ to speak for him while he escaped accountability for his crimes” and then called Vladimir Putin “his boss.”:



51. On January 20, 2023, Defendant stated, “Mike Flynn has committed a lot of crimes”:



52. Outrageously, on January 22, 2023, Defendant stated that General Flynn used “ISIS radicalization techniques” on the American people:

 **Jim Stewartson, Anti-disinfo activist** 🇺🇸🇩🇪
@jimstewartson

It isn't a coincidence that Mike Flynn studied ISIS radicalization techniques and commissioned research on them when he came back from Afghanistan.

QAnon+ is literally American ISIS created by a man who understood the original very well.
[#ArrestMikeFlynn](#)

14 SUPPLEMENTARY NOTES
White Volume July 2012

14 ABSTRACT
This White Volume assesses U.S. long term national security challenges, employing a global perspective that accounts for the changing political, economic, social, and psychological profiles of populations, and the rapid changes they experience in a globally connected information environment. It addresses many of the key national security challenges identified by LTG Flynn in the Preface. The collection of essays explores future population-centric national security challenges through the lens of the latest research from the social, neurological, and complexity sciences. The papers emphasize "enduring" long term themes that are focused on the interactions of populations and their environments. They are not U.S.-centric, but multi-perspective and examine underlying long term phenomena. The target audiences are planners, operators, and policy makers. With them in mind, the articles are intentionally kept short and written to stand alone. All the contributors have done their best to make their articles easily accessible.

14 SECURITY CLASSIFICATION OF:			17 LIMITATION OF ABSTRACT	18 NUMBER OF PAGES	19 NAME OF RESPONSIBLE PERSON
A. REPORT	B. ABSTRACT	C. THIS PAGE	Same as Report (SAR)	276	
unclassified	unclassified	unclassified			

jimstewartson.substack.com
Flynn's Blueprint for Insurgency
A 2012 paper lays out exactly how Mike Flynn would create American ISIS and take us to the brink of civil war

3:30 PM · Jan 22, 2023 · 12K Views

119 Retweets 5 Quotes 290 Likes 9 Bookmarks

53. On January 24, 2023, Defendant said that General Flynn “has been working for Putin for a decade” and is “Q”:

 **Jim Stewartson, Anti-disinfo activist** 🇺🇸🇩🇪
@jimstewartson

The Stern case was dropped because it was performative bullshit.

Mike Flynn is the worst traitor in American history who has been working for Putin for a decade. Also, Mike Flynn is Q.

What are you gonna do about it?

 **Jesse R. Binnall** @jbinnall · Jan 23

Note to the left: the days of being free to impugn General Flynn's good character are over. Today, @GenFlynn settled his defamation lawsuit against Everett Stern for \$150K. From here forward, if you want to defame an American hero, have your checkbook ready.

1/2

[Show this thread](#)

9:30 AM · Jan 24, 2023 · 3,935 Views

30 Retweets 2 Quotes 97 Likes 3 Bookmarks

54. On February 3, 2023, Defendant made several accusations against General Flynn, stating he is “Putin’s General of Propaganda,” he “orchestrated the theft of the 2016 election,” that he is “Q,” and that he “planned the insurrection”:



55. Again, on February 8, 2023, Defendant Tweeted that General Flynn “is working for Vladimir Putin”



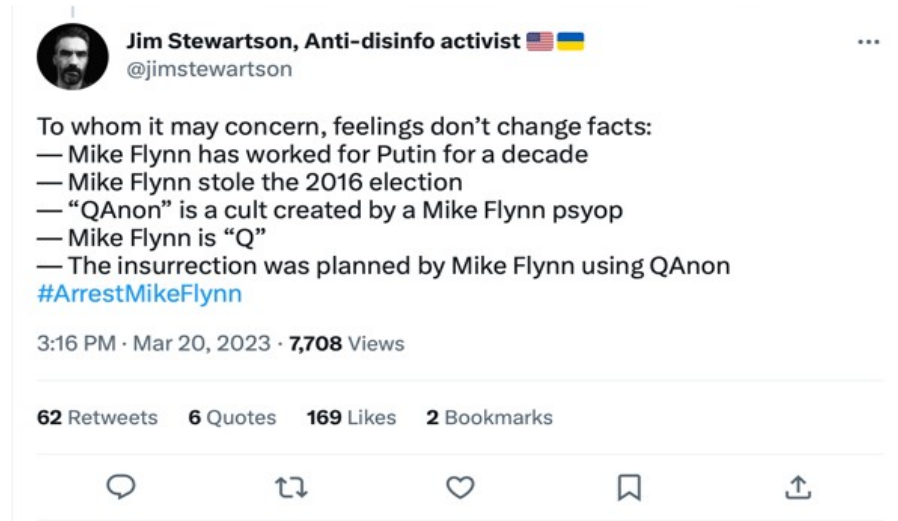
56. On February 23, 2023, Defendant again made a slew of accusations, stating “Mike Flynn created Pizzagate, stole the 2016 election, started QAnon, planned 1/6, and is currently building a theocratic fascist pro-Putin insurgency in the United States of America.”:



57. Next, on March 3, 2023, Defendant Tweeted that General Flynn committed “treason and is ‘the worst traitor in American history.’”:



58. In another slew of accusations on March 20, 2023, Defendant again Tweeted, “Mike Flynn has worked for Putin for a decade,” “Mike Flynn stole the 2016 election,” that General Flynn planned “the insurrection,” and that he created “QAnon”:



59. On March 22, 2023, Defendant again said that General Flynn was part of “the conspiracy to steal the election from Hillary Clinton,” and had “long employment by Vladimir Putin.”:



60. Then, Defendant accused General Flynn of another conspiracy to “overthrow the United States”:

Jim Stewartson, Anti-disinfo activist 🇺🇸🇩🇪 @jimstewartson

The record is clear. The actual conspiracy to overthrow the United States Government in 2020 was committed in public by the same people who did it in 2016.


I urge the press to do your diligence and start telling the truth before it's too late.
[@SecDef](#) [@SecArmy](#) [#ArrestMikeFlynn](#)

Jim Stewartson, Anti-disinfo activist 🇺🇸🇩🇪 @jimstewartson · Jan 10

The level of confusion out there about QAnon and Q is 100% intentional. I have spent two and a half years shoveling through the disinformation.

It's actually very simple. Mike Flynn is Q — and the worst traitor in American history.

Let's review the record. 🇺🇸
[#ArrestMikeFlynn](#)
[Show this thread](#)



11:48 AM · Mar 25, 2023 · 8,279 Views

55 Retweets 5 Quotes 144 Likes 1 Bookmark

🗨️ ↺️ ❤️ 📌 ⬆️

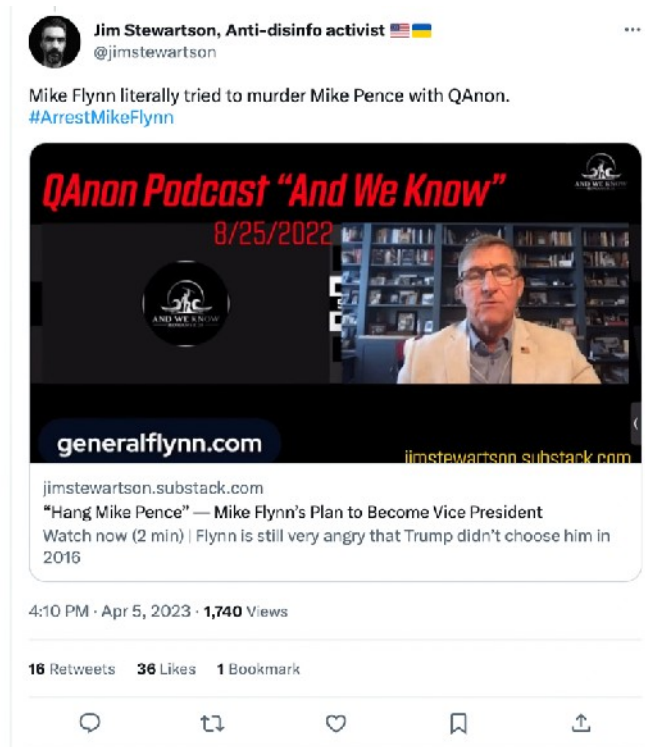
61. In yet another slew of allegations on March 25, 2023, Defendant stated, “Flynn works for Putin,” “Flynn wants to overthrow the US government,” “Flynn stole the 2016 election,” “Flynn is Q,” and “Flynn planned and executed a violent insurrection on 1/6.”:



62. Then, on March 28, 2023, Defendant stated, “Mike Flynn employed Jack Posobiec to torture prisoners”:



63. Continuing to April, on April 5, 2023, Defendant stated, “Mike Flynn literally tried to murder Mike Pence with QAnon.”:



64. Defendant has also used his podcast to call General Flynn a “Russian asset”:



65. Defendant’s Twitter following is roughly 65,000 people, including persons located in the state of Florida. In addition, Defendant’s defamatory Tweets

and other statements were viewed by third parties located in the state of Florida. Defendant's statements were made with the intention of harming a Florida resident.

Defendant's Tweets Show Malicious Hatred of General Flynn

66. Defendant does not attempt to conceal his malice toward General Flynn. Rather, he openly states his desire to see General Flynn and even his family members prosecuted for imagined and invented crimes.

67. Defendant is attempting to gain publicity, fame, and monetary earnings at the expense of a distinguished veteran.

68. As shown by Defendant's own Tweets, he is using his malicious smear campaign against General Flynn as a means of increasing his own public profile, driving business to his podcast, his Substack¹⁰—where he offers paid subscriptions— and social networking sites, integrating himself with other leftwing activists, and explicitly trying to destroy General Flynn's reputation.

69. Indeed, on his Substack, Defendant repeatedly makes solicitations for readers to upgrade to paid subscription status and for donations in the same articles where he spreads his lies about General Flynn.

70. Defendant's statements display animus and resentment toward General Flynn for his political beliefs. In particular, Defendant advocates for the "arrest" of General Flynn, utilizing the hashtag #ArrestMikeFlynn in hundreds of tweets and Substack postings.

¹⁰ Substack is a "subscription network" for writers, and provides the ability to charge subscription fees for your content. See <https://substack.com/>.

71. In addition to the statements specifically referenced above, many of which also show Defendant's malice for General Flynn, the following are additional statements that demonstrate Defendant's malice, as well as his political and financial motives.

72. On June 5, 2021, Defendant called General Flynn and members of his family fascists, traitors, and seditionists:



73. According to Defendant, as of July 2, 2021, he had spent ten months “documenting and publicizing” his lies about General Flynn:



74. On July 25, 2021, Defendant stated that he had been “warning” people about General Flynn for a year, and advocating for his arrest:



75. Notably, Defendant admitted he was “enjoying this”:



76. On August 10, 2021, Defendant even threatened to leak General Flynn’s brother’s cellphone number:



77. Defendant further showed his hatred by saying that General Flynn and his family “all suck.”:



78. That same month, August 2021, Defendant expressed his glee at the politicized de-banking and de-platforming of General Flynn, calling it a “good start,” and then advocating for the arrest of General Flynn:



79. Later that day, again reacting with glee to the politicized de-banking of General Flynn’s family, Defendant called General Flynn a “fucking loser,” and again advocated for General Flynn’s arrest:



80. In another prime example of Defendant’s malicious animus toward General Flynn, he said that General Flynn was a “fucking asshole” in high school solely because of his appearance:



81. Defendant clearly sought followers on the basis of his lies about General Flynn, saying he was “sincerely grateful” for his new followers and that he was “so focused on Mike Flynn”:



82. In another attempt to gain followers, in a Tweet stating “#ArrestMikeFlynn,” Defendant Tweeted, “if you like what I do please consider a follow”:



83. Not even General Flynn’s late mother was off limits from Defendant, who, on October 22, 2022, posted a ghoulish video using a photograph of the late Helen Flynn, and altered it to make it appear that she was speaking to her son, General Flynn. In the video, Defendant manipulates the image of Mrs. Flynn to refer to herself as “crazy-ass Helen Flynn” and to say that she would “haunt you and the rest of my traitor children forever.”¹¹

84. On February 8, 2023, in another ghoulishly doctored video of General Flynn’s late mother, referring to her as the “ghost of Helen Flynn,” Defendant manipulates her image to disparage and mock the Flynn family.¹²:



¹¹ Jim Stewartson, *MindWar: The Psychological War on Democracy: Mike Flynn is Sensitive About His Mom*, SUBSTACK (Oct. 22, 2022) https://jimstewartson.substack.com/p/mike-flynn-is-sensitive-about-his?utm_source=%2Fsearch%2F%2523arrestmikeflynn&utm_medium=reader2

¹² Jim Stewartson, *Helen’s Message for Joe Flynn*, VIMEO (Oct. 23, 2022), <https://vimeo.com/763230953>.

85. On April 3, 2023, Defendant claimed that he would celebrate General Flynn’s arrest:



86. On April 10, 2023, in his Substack post entitled “Why I do this,” Defendant stated that after his Twitter ban he wrote a thread “*off the top of my head* detailing the last decade of Mike Flynn’s treason” (emphasis added).¹³ Defendant statement proved he wrote with no evidence of fact. He also explicitly stated his goal to spread his conspiracy and lies about General Flynn to a million people, and did so within three months.

87. He further stated in the same April 10, 2023 post, “I will ‘get a life’ when Mike Flynn is in prison....the fastest way to get Mike Flynn off the street is to reactivate, recall and court martial him.”¹⁴

¹³ Jim Stewartson, *MindWar: The Psychological War on Democracy: Why I do this*, SUBSTACK (April 10, 2023), https://jimstewartson.substack.com/p/why-i-do-this?utm_source=profile&utm_medium=reader2

¹⁴ *Id.*

88. In response to a notice letter of Defendant’s defamatory comments about General Flynn, instead of retracting and deleting his lies, he doubled down on them, Tweeting the notice with the hashtag “ArrestMikeFlynn,” requesting donations and paid subscriptions on his Substack, and later that same day admitted on his podcast to making the defamatory comments, with the exception of the satan Tweet:

Jim Stewartson, Anti-disinfo activist @jimstewartson

Mike Flynn had someone knock on my door at TAM and hand me a letter demanding I delete and retract all comments about him or he's going to sue me in 5 days.

One correction @jbinnall: I never said @GenFlynn was a "follower of Satan."
[#ArrestMikeFlynn](#)

BINNALL LAW GROUP
April 26, 2023

BY HAND DELIVERY
Jim Stewartson

Re: Defamatory Comments Regarding Lt. General Michael T. Flynn (ret.)

Dear Mr. Stewartson,

I represent Lt. Gen. Michael T. Flynn (ret.), and pursuant to Fla. Stat. § 770.01 (2022) General Flynn intends to commence a lawsuit against you due to your defamatory comments about him on your Twitter feed, as well as your podcast, and other mediums.

These statements include, but are not limited to, accusing General Flynn of committing treason and domestic terrorism, working for Vladimir Putin and being a Russian asset, stealing the 2016 election, working to overthrow the United States government, planning and executing a violent insurrection, being a follower of Satan, being a leader of QAnon, being a Nazi, waging psychological warfare on the American people, waging a second Holocaust, using ISIS radicalization techniques on the American people, torturing prisoners, and "literally" trying to murder former Vice President Mike Pence.

We will file suit against you if you do not delete and publicly retract all comments referencing the above subject matter within five days of this letter.

The foregoing is not intended to be a complete recitation of all applicable law and/or facts underlying General Flynn's claims against you and shall not be deemed to constitute a waiver or relinquishment of any of General Flynn's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved, including General Flynn's right to all available remedies against you, including but not limited to the recovery of costs and attorneys' fees. I look forward to hearing from you soon.

Sincerely,
Jared Roberts
Jared J. Roberts

WWW.BINNALL.COM

Jim Stewartson, Anti-disinfo activist @jimstewar... · Apr 25
A decade ago, Putin compromised an American general, obtained military secrets from his top secret servers, and got a free pass to invade Crimea.

After several years of preparation and experiments, they launched a project to brainwash America and overthrow the US government.
[Show this thread](#)

11:05 AM · Apr 27, 2023 · 112.1K Views

240 Retweets 35 Quotes 567 Likes 23 Bookmarks

89. This all exemplifies Defendant's malice toward General Flynn.

CAUSES OF ACTION
COUNT I
(Defamation and Defamation *Per Se*)

90. Plaintiff incorporates by reference the above paragraphs as though set forth fully herein.

91. Starting May 2020, and continuing to the present, Defendant has engaged in a non-stop smear campaign against General Flynn, repeatedly asserting what he knows to be false, including the following allegations that:

- a. General Flynn is "running QANON";
- b. General Flynn "helped plan and execute 1/6";
- c. General Flynn "work[s] for Putin";
- d. General Flynn is a "Russian asset";
- e. General Flynn is a "literal traitor" and "the worst traitor in American history";
- f. General Flynn is a "terrorist";
- g. General Flynn committed "treason";
- h. General Flynn colluded with Russia to "steal the 2016 election";
- i. General Flynn is a "Nazi";
- j. General Flynn "wants a second Holocaust";
- k. General Flynn uses "ISIS radicalization techniques" on the American people;
- l. General Flynn "torture[d] prisoners";

- m. General Flynn tried to “overthrow the United States”; and
- n. General Flynn “literally tried to murder Mike Pence.”

92. All of these assertions and accusations by Defendant, including those referenced throughout this Complaint and incorporated herein, are categorically false.

93. Defendant’s Twitter following is over 65,000 people, including residents of Florida, to whom Defendant published his defamatory Tweets.

94. Defendant funnels his Twitter followers to his Substack and podcast, where he solicits paid subscriptions and makes money off of his lies about General Flynn

95. Defendant’s defamatory statements were directed at General Flynn, a Florida resident.

96. Defendant published the defamatory statements on Twitter and YouTube, knowing that they were false or with reckless disregard for the truth.

97. The defamatory statements constitute defamation *per se* because they tended to injure General Flynn in his trade, business, or profession, and directly accused General Flynn of committing serious crimes, including treason—punishable by death.

98. The defamatory statements have directly and proximately caused General Flynn to suffer significant damages in Florida, where he lives and does business, including damage to his reputation, humiliation, embarrassment, and

mental anguish, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant.

99. Defendant published the defamatory statements knowingly, intentionally, willfully, wantonly, and maliciously, with intent to harm General Flynn, or in blatant disregard for the substantial likelihood of causing him harm, particularly in his home state of Florida, thereby entitling General Flynn to an award of punitive damages.

100. As a direct and proximate result of the misconduct of Defendant, General Flynn is entitled to compensatory, special, and punitive damages, as well as disgorgement of any and all income Defendant has made off of his lies about General Flynn, not to exceed an amount of \$75,000.00.

COUNT II
(Injurious Falsehood)

101. Plaintiff incorporates by reference the above paragraphs as though set forth fully herein.

102. General Flynn is currently engaged in the business of promoting election integrity and reform.

103. Defendant's false statements, including accusing General Flynn of being the worst traitor in American history, of participating in domestic terrorism and sedition, and of attempting other serious crimes, directly concern General Flynn's business.

104. Defendant intended for his false statements to destroy General Flynn's reputation, to ruin his ability to participate in politics, elections, and policy advocacy,

and to harm him financially. Defendant reasonably recognized and intended that the publication of his statements about General Flynn would result in pecuniary losses.

105. General Flynn has suffered direct pecuniary losses as a result of Defendant's accusations, including costs associated with lost business opportunities and money spent to defend his own reputation, in an amount of \$75,000.00.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Michael T. Flynn, respectfully requests this Court enter a judgment in his favor and grant relief against Defendant as follows:

- a. An award of compensatory, special, and punitive damages, as well as disgorgement of any and all income Defendant has made off of his lies about General Flynn, not to exceed seventy-five thousand dollars (\$75,000.00);
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. An award of Plaintiff's costs associated with this action, including but not limited to his reasonable attorneys' fees and expenses; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiff's rights and interests.

Demand for Jury Trial

Plaintiff demands a trial by jury on all issues so triable.

Dated: May 3, 2023

MICHAEL T. FLYNN
By Counsel

Respectfully submitted,

/s/ Jared Roberts

Jared J. Roberts

(Fl. Bar No. 1036550)

Jason C. Greaves

(*pro hac vice* application forthcoming)

BINNALL LAW GROUP, PLLC

717 King Street, Suite 200

Alexandria, Virginia 22314

Phone: (703) 888-1943

Fax: (703) 888-1930

Email: jared@binnall.com

jason@binnall.com

Counsel for Plaintiff