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**COURT OF COMMON PLEAS
PERRY COUNTY, OHIO**

EMETHY J WOLLENBERG
CLERK OF COURTS

LARRY HOUSEHOLDER
3825 Township Road 19
Glenford, Ohio 43739

Case No.

Plaintiff,

vs.

**HONOR AND PRINCIPLES
POLITICAL ACTION COMMITTEE**
228 S. Washington Street, Suite 115
Alexandria, VA 22314

18-CV-00097

**CONSERVATIVE ALLIANCE
POLITICAL ACTION COMMITTEE**
P.O. Box 26141
Alexandria, Virginia 26141

and

c/o Chris Marston, Treasurer
110 Shooters Court
Alexandria, Virginia 22314-4649

GRP BUYING, LLC
c/o The Corporation Trust Company,
Registered Agent
Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801

NICK EVERHART
3865 Lyon Drive
Columbus, Ohio 43220-4906

DILLON LLOYD
281 Thurman Avenue
Columbus, Ohio 43206-3527

TARGET ENTERPRISES, LLC
c/o David Beinstock, Registered Agent
15260 Ventura Boulevard, Suite 1240
Sherman Oak, California 91403

JULIE IADANZA
4148 Benedict Canyon Drive
Sherman Oaks, California 91423-4320

CHRIS MARSTON
110 Shooters Court
Alexandria, Virginia 22314-4649

MATT SCHLAPP
319 Mansion Drive
Alexandria, Virginia 22302-2904

CHARLIE GEROW
4725 Charles Road, Apt. R
Mechanicsburg, Pennsylvania 17050-3033

AMY FREDERICK
15532 Yorktown Drive
Dumfries, Virginia 22025-1017

ALAN GOTLIEB
12500 NE 10th Place
Bellevue, Washington 98005-2532

BECKY NORTON DUNLAP
1300 Army Navy Drive, Apt. 815
Arlington, Virginia 22202-2010

and

9071 Las Maderas Drive, Apt. 102
Bonita Springs, Florida 34135-2845

JOHN DOES
Addresses Unknown

Defendants.

COMPLAINT
(JURY DEMAND ENDORSED HEREON)

Plaintiff Larry Householder, for his Complaint against Defendants, states as follows:

NATURE OF THE CASE

1. The Defendants in this case have published false and defamatory statements about Larry Householder because they oppose his re-election to the Ohio General Assembly. Specifically, the Defendants published television, radio, and direct mail advertising that falsely claim that Plaintiff Householder is under investigation and is guilty of criminal activity. Those are lies. It is a well-known and widely reported fact that Plaintiff Householder has never been charged with a crime.

2. Defendants ignore this truth and resort to their tactic of publicly spreading lies about Plaintiff Householder because they oppose his conservative leadership, his effective advocacy for his constituents, and his support for President Donald Trump. Furthermore, they oppose his work fighting for the Second Amendment, protecting the unborn, cutting taxes, balancing budgets, promoting new good paying jobs, and fighting the opioid crisis. But even in a political campaign there are limits to the lies that one's opponent can tell. Claiming that Plaintiff Householder is guilty of criminal activity is defamatory, even in a political campaign. The Defendants are defrauding the voting public and in the process damaging Plaintiff Householder's reputation and should be held to account.

THE PARTIES

3. Plaintiff Larry Householder is a candidate in the Republican Party primary for Ohio's 72nd District House of Representatives seat. The Republican primary election for that seat is to be decided on May 8, 2018, and the general election will be held on November 6, 2018 (the "Elections"). Voting in the primary election is underway.

4. Defendant Honor and Principles Political Action Committee (“HP PAC”) is a group of anonymous individuals who oppose Plaintiff Householder in the Elections and have caused tortious injury to Plaintiff Householder in Ohio.

5. Defendant Conservative Alliance Political Action Committee (“CA PAC”) is a group of individuals, which upon information and belief includes individuals not yet identified, who oppose Plaintiff Householder in the Elections and have caused tortious injury to Plaintiff Householder in Ohio.

6. Defendant GRP Buying, LLC is a Delaware limited liability company that upon information and belief is responsible for some or all of the defamatory publications and has caused tortious injury to Plaintiff Householder in Ohio.

7. Defendant Nick Everhart is an Ohio resident who, upon information and belief, published defamatory statements about Plaintiff Householder.

8. Defendant Dillon Lloyd is an Ohio resident who, upon information and belief, published defamatory statements about Plaintiff Householder.¹

9. Defendant Target Enterprises LLC is a California limited liability company that, upon information and belief, is responsible for some or all of the defamatory publications and has caused tortious injury to Plaintiff Householder in Ohio.

10. Defendant Julie Iadanza is a California resident who, upon information and belief, published defamatory statements about Plaintiff Householder in Ohio and caused tortious injury to Plaintiff Householder in Ohio.²

¹ Defendants GRP Buying, LLC, Nick Everhart, and Dillon Lloyd are collectively referred to as “GRP.”

² Defendants Target Enterprises LLC and Julie Iadanza are collectively referred to as “TEL.”

11. Defendant Chris Marston is a Virginia resident, is the Treasurer of Defendant CA PAC, and upon information and belief published defamatory statements about Plaintiff Householder in Ohio and caused tortious injury to Plaintiff Householder in Ohio.

12. Defendant Matt Schlapp is a Virginia resident, is the Chairman of Defendant CA PAC, and upon information and belief published defamatory statements about Plaintiff Householder in Ohio and caused tortious injury to Plaintiff Householder in Ohio.

13. Defendant Charlie Gerow is a Pennsylvania resident, is the Vice Chairman of Defendant CA PAC, and upon information and belief published defamatory statements about Plaintiff Householder in Ohio and caused tortious injury to Plaintiff Householder in Ohio.

14. Defendant Amy Frederick is a Virginia resident, is the Secretary of Defendant CA PAC, and upon information and belief published defamatory statements about Plaintiff Householder in Ohio and caused tortious injury to Plaintiff Householder in Ohio.

15. Defendant Alan Gottlieb is a Washington resident, is an At Large Executive Committee Member of Defendant CA PAC, and upon information and belief published defamatory statements about Plaintiff Householder in Ohio and caused tortious injury to Plaintiff Householder in Ohio.

16. Defendant Becky Norton Dunlap is a Virginia and/or Florida resident, is an At Large Executive Committee Member of Defendant CA PAC, and upon information and belief published defamatory statements about Plaintiff Householder in Ohio and caused tortious injury to Plaintiff Householder in Ohio.³

³ Defendants Marston, Schlapp, Gerow, Frederick, Gottlieb, and Dunlap are collectively referred to as the "Committee."

17. The Defendants John Does are other yet unknown individuals some of which, upon information and belief, are Ohio residents that are responsible for Defendants HP PAC's and CA PAC's publications but who have, to date, concealed their identities from the public.⁴

JURISDICTION AND VENUE

18. Defendants are engaged in conduct that gave rise to the instant claim for relief in Perry County, Ohio.

19. All or part of the claims for relief arose in Perry County, Ohio.

20. Jurisdiction and venue are proper in Perry County because it is the county: where all or part of the claims for relief related to the tortious conduct alleged in this Complaint arose; where the Defendants engaged in some or all of the tortious conduct that gave rise to the claims for relief alleged in this Complaint; and where Defendants caused tortious injury to Plaintiff Householder by an act outside of Ohio committed with the purpose of injuring persons when Defendants reasonably expected that Plaintiff Householder would be injured in Ohio.

FACTS

21. In their effort to prevent Plaintiff Householder from winning the Elections, Defendants have engaged in an organized onslaught of negative campaign advertisements ("Ad(s)") with the common purpose of defrauding the voting public and intentionally harming Plaintiff Householder.

22. Defendants have intentionally and maliciously published false statements with knowledge of their falsity, or reckless disregard for the truth of their verifiably false statements, with a common design and understanding between them to cast hatred, contempt, ridicule, and

⁴ Defendants HP PAC, CA PAC, GRP, TEL, the Committee, and John Does are collectively referred to as "Defendants."

scorn upon Plaintiff Householder. In doing so, Defendants are defaming and ruining Plaintiff Householder's reputation, harming his trade or business, and defrauding the voting public.

23. John Does, upon information and belief, through their common scheme and objective, are funding, purchasing, directing, and/or authoring the defamatory publications with the common purpose of defrauding the voting public and intentionally and maliciously harming Plaintiff Householder.

24. John Does, upon information and belief, are unknown individuals that include Ohio residents that are concealing their identity to avoid liability for their defamatory conduct.

THE RADIO ADS

25. In the lead up to the May 8, 2018 Republican Primary, on or about March 30, 2018, several radio stations began, and still are, publishing a radio campaign Ad placed by GRP and paid for by CA PAC, that upon information and belief was authored and published by CA PAC, the Committee, and/or John Does, that makes false and defamatory statements about Plaintiff Householder. A full transcript of this radio campaign Ad (the "CA PAC Radio Ad") is attached hereto as Exhibit 1 and is incorporated by reference as if fully restated herein.⁵

26. The CA PAC Radio Ad was aired across central Ohio—including Perry County—and makes a false and defamatory statement about Plaintiff Householder. The CA PAC Radio Ad states that Plaintiff Householder is "the career political insider who is under Federal investigation for illegal financial dealings." (*See Ex. 1*). This statement is false; Plaintiff Householder is not "under Federal investigation for illegal financial dealings."

27. The Defendants that published the statement that Plaintiff Householder is "the career political insider who is under Federal investigation for illegal financial dealings"

⁵ Electronic copies of the CA PAC Radio Ad, HP Radio Ad, and HP PAC TV Ad are being filed with the court and will be provided to the Defendants upon request.

intentionally and maliciously published this statement without any privilege to do so. They also published this statement even though they were and are aware of the false nature of the statement.

28. The statement that Plaintiff Householder is “the career political insider who is under Federal investigation for illegal financial dealings” is false and is defamatory *per se*.

29. But running the defamatory CA PAC Radio Ad is not the only unlawful activity the Defendants are engaged in. As a part of the common scheme between CA PAC, the Committee, HP PAC, GRP, TEL, and John Does, Defendants are also publishing defamatory statements that Plaintiff Householder is guilty of a crime in an attempt to harm his reputation, business, and/or trade.

30. HP PAC, on or about March 30, 2018, also began publishing (and still is) a radio campaign Ad placed by TEL and paid for by HP PAC, that upon information and belief was authored and published by HP PAC and/or John Does, that makes false statements about Plaintiff Householder. A full transcript of this radio campaign Ad (the “HP PAC Radio Ad”) is attached hereto as Exhibit 2 and is incorporated by reference as if fully restated herein.

31. The HP PAC Radio Ad was aired across central Ohio—including Perry County—and makes false, malicious, and defamatory statements because it states that “[the FBI] refuse to put ... Larry Householder behind bars. Householder was under federal investigation for illegal financial dealings, for taking kickbacks, trading legislation for campaign contributions, skimming off the top of accounts and pocketing the money for himself. They had him in their sights. But just like Hillary they let Householder walk free as he plots a return to power.” (See Ex. 2).

32. When viewed in the totality of the circumstances, the HP PAC Radio Ad says that Larry Householder is guilty of criminal activity. Householder, the HP PAC Radio Ad states,

should be “behind bars” because he committed crimes and the only reason he isn’t is because the FBI “refuse[d] to put” him there.” The Ad takes the fact that the FBI did not charge Householder with any crimes and flips it on its head and states that Householder actually is guilty of those crimes. Householder, according to the HP PAC Radio Ad, is guilty and only the FBI’s “refusal” keeps him out of jail. The HP PAC Radio Ad cannot be innocently understood to say anything other than the verifiably false statement that Plaintiff Householder is guilty of a crime and should be in jail, which injures his reputation, business, and/or trade.

33. The Defendants that published the HP PAC Radio Ad are intentionally and maliciously publishing defamatory statements without any privilege to do so and they are publishing these defamatory statements even though they were and are aware of the false nature of those statements.

34. The HP PAC Radio Ad contains false and defamatory statements that are defamatory *per se*.

THE TV AD

35. Apparently not satiated by mere radio Ads, Defendants then moved on to a television Ad to continue their common objective to destroy Plaintiff Householder’s reputation and defraud Perry County voters.

36. On or about March 29, 2018, a television Ad began airing (and still is) across central Ohio—including Perry County—that contains false and defamatory statements paid for by TEL and HP PAC, that upon information and belief were authored by HP PAC and/or John Does, that Plaintiff Householder is guilty of a crime (the “HP PAC TV Ad”). A full transcript of the HP PAC TV Ad is attached hereto as Exhibit 3 and incorporated herein by reference as if fully restated herein.

37. The HP PAC TV Ad's language includes false and maliciously made statements that import a charge of a crime that injures Plaintiff Householder's reputation, business, and/or trade. That Ad states that "The FBI and Justice Department harass President Trump wasting millions on a witch hunt, but they refuse to put crooked Hilary or lying Larry Householder behind bars? Householder was under federal investigation for illegal financial dealings, they had him in their sites, but he walks free and he keeps ignoring the law." (*See* Ex. 3).

38. When viewed in the totality of the circumstances, the HP PAC TV Ad says that Plaintiff Householder is guilty of criminal activity. Staying true to the Defendants' message, the HP PAC TV Ad states that Householder "walks free and ... keeps ignoring the law" but is not in jail because "[t]he FBI and Justice Department ... refuse to put" him there. The HP PAC TV Ad conflates the fact that Plaintiff Householder was investigated with actual guilt (despite never being indicted or adjudicated as such) and that but for the FBI's and Justice Department's failure to do their job, Householder would be in jail. (*See* Ex. 3). The HP PAC TV Ad cannot be innocently understood to say anything other than the verifiably false statement that Plaintiff Householder is guilty of a crime and should be in jail, which injures his reputation, business, and/or trade.

39. The Defendants that published the HP PAC TV Ad are intentionally and maliciously publishing defamatory statements without any privilege to do so and they are publishing these defamatory statements even though they were and are aware of the false nature of those statements.

40. The defamatory statements being published in the HP PAC TV Ad are verifiably false statements and are defamatory *per se*.

THE DIRECT MAIL

41. But that was not all. Defendants' common plan also resorted to sending unsolicited campaign mailers to Plaintiff Householder's constituents.

42. CA PAC is publishing a campaign mailer that, upon information and belief CA PAC and/or John Does authored. (the "CA PAC Mailer"). Attached hereto and incorporated herein as Exhibit 4 is a copy of the CA PAC Mailer.

43. In the CA PAC Mailer, CA PAC, the Committee, and John Does are publishing the following statements: "[Plaintiff Householder] was under investigation by the FBI for taking kickbacks and illegally pocketing campaign contributions. But just like Hillary Clinton the FBI let him off the hook." (*See Ex. 4*).

44. The CA PAC Mailer's language includes false and maliciously made statements accusing Plaintiff of committing a crime. When viewed in the totality of the circumstances, the CA PAC Mailer's statements that Plaintiff Householder "was under investigation by the FBI for taking kickbacks and illegally pocketing campaign contributions" and "the FBI let him off the hook" cannot innocently be read to say anything other than the verifiably false statement that Plaintiff Householder is guilty of a crime and that the FBI should put in him jail.

45. The Defendants that published the CA PAC Mailer are intentionally and maliciously publishing a defamatory statement without any privilege to do so and they are publishing these defamatory statements even though they were and are aware of the false nature of those statements.

46. The defamatory statements being published in the CA PAC Mailer are verifiably false statements that are defamatory *per se*.

47. HP PAC is also publishing a campaign mailer that, upon information and belief HP PAC and/or John Does authored, that was mailed to Perry County residents (the “HP PAC Mailer 1”). Attached hereto and incorporated herein as Exhibit 5 is a copy of HP PAC Mailer 1.

48. HP PAC Mailer 1 states:

The FBI had [] Larry Householder in their sights for conducting illegal financial dealings. From taking kick backs and lining his own pockets to trading legislation for campaign contributions. Yet [] Larry Householder was let off the hook by the FBI. While the feds waste millions on a witch hunt, harassing President Trump, [] Larry Householder and Crooked Hillary Clinton are free to go. (*See Ex. 5*).

49. When viewed in the totality of the circumstances, HP PAC Mailer 1’s language falsely and maliciously says that Plaintiff Householder is guilty of criminal activity. HP PAC Mailer 1 states that Householder should be in jail because he is guilty of certain crimes and isn’t because he “was let off the hook by the FBI” and now is “free to go.” Here again, according to the HP PAC Mailer 1, it is the FBI failure to do its job and incarcerate Householder that keeps him out of jail but not his innocence. HP PAC Mailer 1 thus cannot be innocently read to say anything other than the verifiably false statement that Plaintiff Householder is guilty of a crime and should be in jail.

50. The Defendants that published HP PAC Mailer 1 are intentionally and maliciously publishing defamatory statements without any privilege to do so and they are publishing these defamatory statements even though they were aware of the false nature of those statements.

51. The defamatory statements being published in HP PAC Mailer 1 are verifiably false statements that are defamatory *per se*.

52. HP PAC is publishing a second campaign mailer that, upon information and belief HP PAC and/or John Does authored, that was mailed to Perry County residents (the “HP PAC

Mailer 2”). Attached hereto and incorporated herein as Exhibit 6 is a copy of the HP PAC Mailer 2.

53. HP PAC Mailer 2 states:

While the FBI and Justice Department waste millions on a witch hunt and harassing President Trump. Larry Householder goes away. The feds were hot on the trail of [] Larry Householder. Householder was under investigation for taking kickbacks, trading legislation for campaign contributions, skimming off the top of accounts and pocketing the money for himself. Now [] Larry Householder is off the hook, ignoring the law as he plots a return to power. Enough of the crooked politicians. Enough of [] Larry Householder. While [] Larry and Crooked Hillary Walk Free. [] Larry Householder was under investigation for illegal financial dealings. The feds had [] Larry Householder in their sights, but they let him walk free. (*See Ex. 6*).

54. When viewed in the totality of the circumstances, HP PAC Mailer 2 says that Plaintiff Householder is guilty of criminal activity. HP PAC Mailer 2 states that Householder is “ignoring the law” and not in jail because the “feds ... let him walk free.” This Ad—as does the others—cannot be innocently read to say anything other than the verifiably false statement that because Householder was investigated he is guilty of criminal activity and only “walks free” because authorities are not doing their job.

55. The Defendants that published HP PAC Mailer 2 are intentionally and maliciously publishing a defamatory statement without any privilege to do so and they are publishing these defamatory statements even though they were aware of the false nature of those statements.

56. The defamatory statements being published in HP PAC Mailer 2 are verifiably false statements that are defamatory *per se*.

57. HP PAC is publishing a third campaign mailer that, upon information and belief HP PAC and/or John Does authored, that was mailed to Perry County residents (the “HP PAC Mailer 3”). Attached hereto and incorporated herein as Exhibit 7 is a copy of HP PAC Mailer 3.

58. HP PAC Mailer 3 states:

The FBI and Justice Department have harassed President Trump and wasted millions on a witch hunt. Meanwhile Crooked Hilary and [] Larry Householder walk around scot-free. Householder was under federal investigation for illegal financial dealings, taking kickbacks, trading legislation for campaign contributions and skimming off the top of accounts and pocketing the money for himself. (*See Ex. 7*).

59. When viewed in the totality of the circumstances, HP PAC Mailer 3 states that Plaintiff Householder is guilty of criminal activity because he was investigated but now “walk[s] around scot-free.” HP PAC Mailer 3 cannot be innocently read to say anything other than the verifiably false statement that Plaintiff Householder is guilty of the referenced crimes and should be in jail merely because he was investigated despite never being convicted—let alone charged—for those alleged activities.

60. The Defendants that published HP PAC Mailer 3 are intentionally and maliciously publishing a defamatory statement without any privilege to do so and they are publishing these defamatory statements even though they were and are aware of the false nature of those statements.

61. The defamatory statements being published in HP PAC Mailer 3 are verifiably false statements that are defamatory *per se*.

COUNT I – DEFAMATION

62. Plaintiff Householder incorporates the preceding paragraphs of this Complaint as if fully restated herein.

63. Defendants intentionally and maliciously published their false statements with the express purpose and with the effect of harming Plaintiff Householder’s reputation and good name in order to defraud voters into voting for his opponents in the Elections.

64. Defendants' false statements include the verifiably false statement that Plaintiff Householder is under Federal investigation for illegal financial dealings.

65. Defendants' false statements also accuse Plaintiff Householder of committing a crime, which include statements that import a charge of an indictable offense involving moral turpitude or infamous punishment.

66. Defendants maliciously made all of these false statements with the knowledge that the statements were false and/or with reckless disregard for the truth or falsity of such statements.

67. Defendants did not care whether the statements were true as long as they harmed Plaintiff Householder's reputation and good name, business, and/or trade.

68. Defendants' defamatory statements are verifiably false.

69. Defendants' false statements did, in fact, harm Plaintiff Householder's reputation by defrauding voters and other members of the community into believing that Plaintiff Householder is currently under investigation by the FBI and that he is guilty of a crime.

70. Defendants published their false statements without the privilege to do so.

71. Defendants' false statements are defamatory *per se*.

72. Plaintiff Householder has suffered damage as a result of Defendants' defamatory statements.

COUNT II – CONSPIRACY

73. Upon information and belief, Defendants have intentionally and maliciously conspired together with the intent to injure Plaintiff Householder by publishing false and defamatory statements about Plaintiff Householder.

74. In furtherance of their conspiracy, Defendants have intentionally and maliciously published a defamatory television Ad, radio Ads, and campaign mailers that make verifiably false statements about Plaintiff Householder.

75. As a result of Defendants publication of these false and defamatory statements, Defendants have cast hatred, contempt, ridicule, and scorn upon Plaintiff Householder in order to defame and ruin Plaintiff Householder's reputation, business, and/or trade.

76. In committing these acts, Defendants acted with actual malice toward Plaintiff Householder and Plaintiff Householder is entitled to recover punitive damages in an amount to be determined at trial.

COUNT III – INJUNCTIVE RELIEF

77. Plaintiff Householder incorporates by reference his allegations contained in all preceding paragraphs as fully rewritten herein.

78. Defendants are publishing false and defamatory statements about Plaintiff Householder.

79. Plaintiff Householder is being irreparably harmed and will continue to be harmed if Defendants are not restrained and enjoined from continuing to publish the defamatory statements.

80. The facts alleged herein demonstrate that Plaintiff Householder is likely to succeed on the merits of his claims.

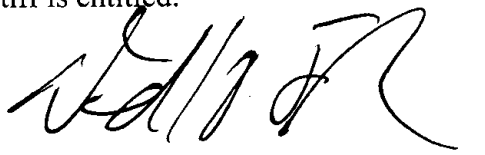
81. No third parties will be unjustifiably harmed if an injunction is granted, and the public interest will be served by an injunction.

82. Plaintiff Householder has no adequate remedy at law to prevent Defendants' ongoing publication of defamatory statements.

83. Once the Court determines that the false statements at issue are defamatory it may issue an injunction preventing further publication of those defamatory statements.

WHEREFORE, Plaintiff Householder asks the Court for the following relief and judgment:

- A. Compensatory damages in an amount in excess of \$25,000 to be determined at trial;
- B. Punitive damages in an amount in excess of \$25,000 to be determined at trial;
- C. Enjoining defendants from any further publication of the defamatory statements;
- D. Attorney Fees, and costs; and,
- E. Any such other relief to which Plaintiff is entitled.

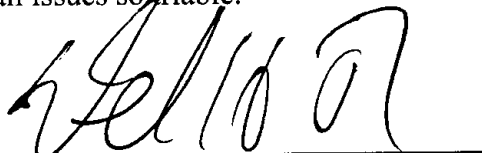


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Counsel for Larry Householder

JURY DEMAND

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



David H. Thomas

PRAECIPE FOR SERVICE

TO THE CLERK:

Please issue summonses, and serve the Summons and a copy of the Complaint on each Defendant by certified mail service, return receipt requested, at the addresses stated in the caption of this Complaint. Thank you.

A handwritten signature in black ink, appearing to read 'D. H. Thomas', written in a cursive style. The signature is positioned above a horizontal line.

David H. Thomas