

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN

Plaintiff,

vs.

CHRISTOPHER ELLIS BOUZY, BOT SENTINEL, INC, GEORGE WEBB SWEIGERT, DAVID GEORGE SWEIGERT, BENJAMIN WITTES, NINA JANKOWICZ, ADAM SHARP, MARGARET ESQUENET, THE ACADEMY OF TELEVISION ARTS AND SCIENCES, SETH BERLIN, MAXWELL MISHKIN

Defendants

Case No.: 1:21-cv-10878-AT-JLC

OBJECTION TO ORDER AND REPORT AND RECOMMENDATION

Jason Goodman (“Goodman”), by and for himself pro se, respectfully objects to the order and report and recommendation (“ORR”) issued May 8, 2023 due to clear errors, substantial new information from the Department of Justice (“DOJ”) that was previously not known, and for additional reasons as stated below. Even if the Court determines Goodman’s pleadings fail for the reasons cited, this case was not brought with frivolous intent and should not be dismissed. In the interest of justice, and in light of new information discovered after the order was issued, Goodman should be granted leave and additional time to file an answer to all motions to dismiss and to amend his complaint to address the identified defects.

INTRODUCTORY STATEMENT

Defendants in this case are well resourced and sophisticated. They are highly experienced in the areas of media, information technology and the law. Defendant Benjamin

1 Wittes (“Wittes”) is the cofounder and editor of the Lawfare blog and fellow at the nonprofit
2 Brookings Institution (“Brookings”). Wittes claims to be close personal friends with former
3 Federal Bureau of Investigation (“FBI”) executives including former Director James Comey
4 (“Comey”) and former General Counsel James Baker (“Baker”). Wittes has corresponded
5 with Comey utilizing his personal email address as demonstrated in the evidentiary exhibit
6 provided by the Homeland Security and Government Accountability Committee (“HSGAC”)
7 of the U.S. Senate on December 3, 2020 (**EXHIBIT A**) (the “Comey Email”).
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10 The Comey Email evidence supports Goodman’s allegation that Wittes
11 deliberately hid facts pertaining to his role in perhaps the greatest hoax of all time. Goodman
12 alleges defendants perpetrated a hoax against the American public and the 45th President of
13 the United States which created a need to hide facts and details about the death of political
14 operative Peter W. Smith (“Smith”). Goodman further alleges defendants conspired to
15 disrupt him in myriad ways, including filing vexatious litigation and obstructing Goodman’s
16 ability to earn a living to prevent him publishing information about these facts. To obstruct
17 him from conducting business or earning a living, defendants interfered with Goodman’s
18 access to social media and have engaged in ongoing cyber stalking and harassment beginning
19 in 2017 and continuing through today, coordinated by David George Sweigert (“Sweigert”).
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22 Judge Cott has recommended this Court dismiss Goodman’s claims because
23 he has concluded they are “conspiracy theories” and the Court may, or may not agree with
24 this pejorative, legally meaningless conclusion. However, unlike the conspiracy theory
25 promulgated by Wittes and promoted by his codefendants which has now been disproven,
26 Goodman’s theories are based in fact and supported by irrefutable evidence that has not yet
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1 been challenged. The Court could only accept Judge Cott’s recommendations by ignoring
2 unimpeachable evidence, denying facts, and relinquishing its duty to serve justice.

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4 **New Information of Unprecedented Historic Significance**

5 On May 12, 2023, the U.S. Attorney General published a Report on Matters
6 Related to Intelligence Activities and Investigations Arising Out of the 2016 Presidential
7 Campaigns submitted by Special Counsel John H. Durham (“Durham”) pursuant to 28 C.F.R.
8 § 600.B(c) (the “Durham Report”) (<https://www.justice.gov/storage/durhamreport.pdf>). The
9 Durham Report provides details of an FBI investigation (“Crossfire Hurricane”) that sought
10 to prove an ill-conceived conspiracy theory that vaguely alleged dubious “collusion” between
11 former President Donald Trump, his associates and various Russian individuals or agencies.
12

13 After more than four years of investigating and three criminal prosecutions,
14 the three-hundred-six-page Durham Report found, “neither U.S. law enforcement nor the
15 Intelligence Community appears to have possessed any actual evidence of collusion in their
16 holdings at the commencement of the Crossfire Hurricane investigation.” Durham further
17 concluded, “that the Department and the FBI failed to uphold their important mission of strict
18 fidelity to the law” and that, “FBI attorney Kevin Clinesmith committed a criminal offense
19 by fabricating language in an email that was material to the FBI obtaining a FISA
20 surveillance order.” Durham’s damning allegations are remarkably similar to the harsh
21 rebukes District Court Judge Valerie Caproni received from Senator Chuck Grassley and
22 Representative John Conyers prior to her departure from the FBI and confirmation as District
23 Court Judge as cited in the amended complaint (*See* ECF No. 100 page 81). The allegations
24 Wittes promoted with the Comey Email were made up out of whole cloth, yet the FBI was
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1 convinced to investigate. Thursday June 1, 2023, Durham will testify before Congress to
2 provide even more information that is not yet known. On information and belief, Goodman
3 alleges Wittes, or an agent acting on his behalf, created a document (the “Smith Document”)
4 that was used with the December 28, 2016 Comey Email to convince the FBI that there was
5 sufficient evidence of Russian hacking and Trump campaign collusion to investigate.
6

7 The information contained in the Durham Report is of particular importance to
8 this instant action for several reasons. One of three individuals criminally charged as a result
9 of the investigation was former Brookings Institution (“Brookings”) employee, Igor
10 Danchenko (“Danchenko”). The Durham Report also references Brookings Fellow 1 and
11 Brookings Fellow 2. Brookings is a public nonprofit charity. Wittes is a senior fellow at
12 Brookings which publishes the Lawfare blog in cooperation with the Lawfare Institute. The
13 Lawfare Institute is also a public nonprofit charity, but it shares Wittes’ residential address.
14 (https://apps.irs.gov/pub/epostcard/cor/462967640_202012_990T_2022041319859712.pdf)
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17 Goodman alleges on information and belief that Brookings Fellow 1 is
18 Wittes. The Comey Email and other details in the Durham Report support this allegation.
19 This case should be allowed to proceed to discovery so Goodman may prove, or defendants
20 may disprove these, and other well-founded public domain evidence backed allegations.
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22 Goodman’s allegations are based in fact and supported by unimpeachable
23 evidence which is now further strengthened by the Durham Report. To wit, none of the
24 defendants have contradicted or even challenged Goodman’s evidentiary claims. Instead,
25 they focus on procedural traps intended to confound non-attorney Goodman as they continue
26 to deceive the Court in an effort to enjoin him from bringing this damning evidence to light.
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28 OBJECTION TO ORDER AND REPORT AND RECOMMENDATION - 4

WITTES EMAIL TO FBI DIRECTOR COMEY

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2 In the email exchange validated as evidence by the HSGAC, defendant
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4 Wittes notified then FBI director Comey of a “strange document” in his possession that he
5 claimed was given to him by Wall Street Journal (“WSJ”) reporter Shane Harris (“Harris”).
6
7 Goodman is personally aware that in 2017, Harris claimed to have a document in his
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9 possession allegedly written by GOP political operative, Peter Smith (“Smith”), titled “A
10
11 Demonstrative Pedagogical Summary to be Developed and Released Prior to November 8,
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13 2016”. Goodman alleges this is the Smith Document referred to in the Comey Email which
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15 was never publicly disclosed prior to Smith’s death in May 2017. In the course of writing a
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17 series of articles beginning June 29, 2017, Harris contacted one of Smith’s associates,
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19 Charles Ortel (“Ortel”) inquiring about the Smith Document. Goodman was present with
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21 Ortel at the time of the phone call. (<https://www.wsj.com/articles/gop-operative-sought-clinton-emails-from-hackers-1498770851>). An associate of
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23 Wittes, former British Intelligence officer, and contributor to his Lawfare blog, Matt Tait
24
25 (“Tait”) published an article on June 30, 2017, claiming Smith had provided Tait with the
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27 Smith Document. (<https://www.lawfareblog.com/time-i-got-recruited-collude-russians>).
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29 Smith, having died more than one month prior, could not confirm, or refute Tait’s claim.

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32 Goodman became acquainted with Ortel on the same day, June 30, 2017, at
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34 a meeting arranged by George Webb Sweigert (“Webb”). Ortel received a call from Harris at
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36 the meeting. Pursuant to the Smith Document, Harris alleged Ortel was raising funds for
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38 KLS Research LLC (“KLS”), a company attributed to Smith. Ortel claimed no knowledge of
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40 the document, no connection to KLS and no involvement in fundraising with Smith.

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OBJECTION TO ORDER AND REPORT AND RECOMMENDATION - 5

CLEAR ERRORS

a. Judge Cott Falsely Asserted Goodman Accused Wittes of Murder

On page 3 of the ORR, Judge Cott states, “Goodman advanced his theory that Wittes, whom he added as a defendant, murdered a political operative, Peter Smith.” This is false. Goodman has never accused Wittes of murdering anyone. This inaccurate conclusion is so gross in its mischaracterization of the facts, and so fundamental to the case, this one error alone should cause the Court to reject the entire ORR. This error indicates either a complete misunderstanding of the facts in dispute, or else an insurmountable bias against Goodman sufficient to disqualify Judge Cott.

Goodman has not wavered from his accusation that Wittes participated in a scheme to hide facts and widely publicize a false narrative about the death of Smith. Goodman has also accused Wittes of enlisting a growing number of coconspirators including defendants, to challenge Goodman in an increasingly damaging manner as Goodman has persisted in attempting to expose facts and evidence. There is only more evidence today that supports Goodman’s allegations than when this case began. Defendants have worked to delete evidence from the Internet even as Goodman makes new filings in this and other cases.

b. Judge Cott Falsely Asserted Bouzy Was Aware of Rape Allegations

Page 24 paragraph 2 of the ORR states, “Bouzy stated only that he was *aware* [emphasis added] of allegations that Goodman had raped someone.” This is false. Bouzy has admitted that he was not aware of these allegations, he merely presumed them to exist at the time of the phone call. In a tweet previously presented to the Court, (*See* ECF No. 1 Page 9) Bouzy said, “Until creepy Jason Goodman called me, I had no clue someone

1 previously accused him of rape, and it's a bizarre thing to tell a stranger in a phone call.”
2 That claim is false. Goodman did not tell Bouzy he had been accused of rape. Goodman
3 repeatedly told Bouzy there was no rape accusation, but Bouzy kept reasserting his own
4 affirmations. During the recorded phone call, completely unprompted, Bouzy suggested he
5 could find a person online who had accused Goodman of rape and could publicize that if he
6 chose to, merely as a function of the fact that Goodman is a known social media personality.
7 Goodman immediately informed Bouzy, “I will sue you for libel and slander if you do that
8 because that is a civil tort” (*See* ECF No. 80-3 page 10 line 2). This was Goodman’s first
9 clear warning to Bouzy that the allegation was false and actionable in his view. Later in the
10 same conversation, Goodman reiterated the falsity of the allegation by saying, “go try to find
11 somebody who claims I raped them. You will not find that. You will find a litany of social
12 engineering liars who have been pursuing me for years with false claims along the lines of
13 what you're suggesting.” Goodman’s meaning by saying “along the lines” referred to equally
14 outrageous, equally heinous, equally false claims, but he did not affirmatively tell Bouzy that
15 a rape allegation existed. Bouzy replied, “oh, wait a second. Wait. So someone suggested
16 this? Because, you know, *I just literally just made that up* [emphasis added]”. Goodman
17 clarified further, “they claim I'm a Mossad agent because I'm Jewish” and then elaborated on
18 the harassment and other outlandish statements he endures regularly. At no time on the call
19 did Goodman confirm the existence of the specific allegation Bouzy cited. When Bouzy
20 pressed the idea by asking hypothetically how Goodman might feel if false rape allegations
21 were spread about him, Goodman said as quoted in the ORR that he would feel like it was a
22 normal daily occurrence because “People have put out lies about me of all kinds.” This is
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1 still not an affirmative confirmation of any specific allegation. With two vehement negative
2 responses and one inconclusive but certainly not affirmative statement, Bouzy was at least
3 reckless with regard to the truth of his claims at the time he made them. Bouzy made no
4 effort to confirm the existence of a rape allegation before he tweeted, falsely declaring to the
5 public that Goodman told him the allegation existed. Bouzy made the claim both maliciously
6 in the common sense and with actual malice in the legal sense due to his reckless disregard
7 for whether it was false or not. At the time Bouzy publicized his claimed knowledge of a
8 rape allegation, he had made no effort to confirm its truthfulness and had no actual purpose
9 for publishing it aside from harming Goodman. Allowing defendants to succeed with this
10 disingenuous defense sets a dangerous precedent for future victims of false accusations and
11 diminishes true allegations. The Court should not dismiss the defamation and related claims.
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15 **c. Default Against Bouzy and Bot Sentinel**

16 In dismissing Goodman’s motions for default and sanctions, the ORR cites
17 *Sikhs for Justice v. Nath* making its determination that default was not willful because once
18 Bouzy became aware of the application for default judgment, he “engaged current counsel to
19 represent [his] interests”. This is not what happened in this case. Defendant Bouzy was well
20 aware of this case and mocked it and Goodman for months while deliberately defaulting.
21 Counsel was only engaged after Sweigert alerted Wittes and Jankowicz of the pending
22 default via Twitter (*See* ECF No. 92 page 1). Wittes and Jankowicz were not defendants in
23 this action at the time. Defendant Bouzy was aware of and actively boasting of his willful
24 default prior to Sweigert’s tweet but failed to engage counsel. For this reason, Judge Cott’s
25 recommendation with regard to the default judgment should not be adopted.
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1 **d. Remaining Defendants’ Pending Motions to Dismiss**

2 The Court should not grant the remaining defendants’ motions to dismiss, nor
3 should it dismiss claims against defendants that have not yet responded for the myriad
4 reasons cited in this objection. Goodman’s well-founded, evidence backed claims have not
5 been refuted by defendants or the Court. Given the gravity of the allegations and the strength
6 of new evidence in the Durham Report worthy of judicial notice, Goodman should be granted
7 leave to amend and further opportunity to form a cognizable RICO claim.
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10 **e. Goodman’s RICO claims**

11 Goodman is not an attorney nor is he a frequent litigant by choice. Goodman
12 was not involved in litigation aside from divorce prior to meeting these defendants in 2017
13 and being subjected to their perpetual lawfare assault. Defendants’ clear desire for Goodman
14 to “hire an attorney” is repeated throughout the daily inappropriate and vexatious “litigation
15 emails” sent by Sweigert. Goodman has primarily been the defendant in the cases cited, most
16 of which were presided over by Judge Caproni. Judge Caproni has a personal motive to paint
17 Goodman with the meaningless pejorative “conspiracy theorist” because his factual reporting
18 implicates her in the alleged conspiracy (*See* ECF No. 100 page 80). Members of Congress
19 have separately accused judge Caproni of violating the law repeatedly (*See* ECF No. 100
20 page 81). Goodman is aware that most criminal statutes do not include civil causes of action.
21 His citations of criminal codes were intended to identify the predicate acts required to make a
22 RICO claim. The ORR has clarified aspects that caused Goodman’s filing to fail. In the
23 interest of justice, given the gravity of the allegations and strength of the supportive evidence
24 now in the public domain, Goodman should be granted leave to amend and cure the defects.
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1 **f. Goodman Has Adequately Alleged Falsity and Actual Malice**

2 Although the Court may agree that Goodman’s pleading was inartful, it has
3 indeed alleged falsity with regard to Bouzy’s defamatory statements. On December 20,
4 2020, Bouzy tweeted, “Until creepy Jason Goodman called me, I had no clue someone
5 previously accused him of rape, and *it’s a bizarre thing to tell a stranger in a phone call*
6 [emphasis added]. It’s also odd to tell someone they would be part of ongoing litigation if
7 they tweeted about it. Why bring it up?...” (See ECF No. 62 page 8). Goodman did not bring
8 it up in the phone call, Bouzy did. It is also false to state that Goodman told Bouzy he had
9 been accused of rape. As previously detailed in this objection, Bouzy derived his false
10 inference from two negative responses from Goodman and one vague response insufficient to
11 construe as Goodman telling Bouzy a rape allegation existed. Bouzy made false statements
12 with reckless disregard for the truth and intent to harm Goodman amounting to actual malice.
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16 **g. Abuse of Process**

17 Sweigert at least is guilty in this regard. Acting on behalf of and for the
18 benefit of all defendants, Sweigert sends harassing emails to Goodman daily. The false,
19 defamatory, and abusive emails sent under the guise of “litigation communications” are far
20 too numerous to include with this objection but will be produced if this case is allowed to
21 proceed to discovery as it should be for the reasons cited.
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24 **h. Bouzy Bot Sentinel and Counsel Should be Sanctioned.**

25 In recommending the denial of Rule 11 sanctions the ORR ignores Judge
26 Torres individual rules III. B. ii., which states in relevant part, “Before the time to file a
27 responsive pleading has expired.” Counsel for defendants were in communication with
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1 Goodman after the time to respond had expired so this rule does not apply. Further, the ORR
2 ignores Judge Torres Individual Practices In Pro Se Cases Rule IV.C. which states, “Pre-
3 motion conferences and pre-motion letters are not required in pro se cases”. Goodman’s
4 motion for sanctions should not be dismissed because counsel for defendants failed to follow
5 the rules in their disingenuous effort to trick a pro se litigant into dismissing valid claims.
6

7 **i. Wittes and Jankowicz Motion for Sanctions Should Be Denied**

8 Wittes and Jankowicz have been accused of various torts and crimes by
9 Goodman. Goodman has provided unimpeachable evidence in support of these allegations.
10 By contrast, Wittes and Jankowicz have received communication from Sweigert, and acted
11 on those communications in ways that indicate ongoing cooperation, including the tweet that
12 prompted the engagement of counsel for defendants Bouzy and Bot Sentinel. Sweigert
13 played a pivotal role in assisting Jankowicz and her attorney in filing a false police report in
14 Arlington Virginia and making false statements to the Arlington General District Court that
15 resulted in a fraudulent order of protection against Goodman.
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17 An appeal of the order is pending in Arlington General Circuit Court to be
18 decided in June 2023. The mere suggestion that Goodman should be so strictly enjoined
19 from ever raising these valid claims against these defendants again, while simultaneously
20 denying Goodman’s motion for similar relief with regard to Sweigert, is nothing short of
21 absurd. This is another demonstration of insurmountable bias against Goodman on the part
22 of Judge Cott. Defendants will fail to refute Goodman’s unimpeachable evidence so instead
23 they seek to manufacture claims on which they predicate motions for sanctions. Judge Cott’s
24 recommendation that Goodman be sanctioned must be denied in the name of justice.
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(EXHIBIT A)

From: McCabe, Andrew G. (DO) (FBI)
Sent: Wednesday, December 28, 2016 3:46 PM
To: James B. Comey
Subject: RE: A weird development

Very odd.

I have a few updates for you. DO you have time for a quick chat?

Andrew G. McCabe
Deputy Director
Federal Bureau of Investigation

From: James B. Comey
Sent: Wednesday, December 28, 2016 1:13 PM
To: Rybicki, James E. (DO) (FBI) <James.Rybicki@ic.fbi.gov>; McCabe, Andrew G. (DO) (FBI) [REDACTED]@ic.fbi.gov>; Baker, James A. (OGC) (FBI) <James.Baker@ic.fbi.gov>
Subject: Fwd: A weird development

----- Original message -----

From: Reinhold Niebuhr [REDACTED]
Date: 12/28/16 1:11 PM (GMT-05:00)
To: "James B. Comey" [REDACTED]@ic.fbi.gov>
Subject: Fwd: A weird development

----- Forwarded message -----

From: Benjamin Wittes [REDACTED]
Date: Wed, Dec 28, 2016 at 11:48 AM
Subject: A weird development
To: Reinhold Niebuh [REDACTED]

Hey there--

I'm writing because a very strange document has crossed my desk that may--or may not--have implications for investigations you guys are conducting. Under normal circumstances, I would simply assume that the document is either a fraud or that you guys already know all about it. (Both may well be true, as it is.) The wrinkle here is that the document--which purports to be a series of reports/dispatches by a private British intel company on

Trump and Russia and the hacking and contains a number of highly-detailed accounts stuff that would be explosive if alleged publicly--is being furiously investigated by, at a minimum, the Wall Street Journal (the document was given to me by Shane Harris). What's more, it seems to already be in the hands of the SSCI. I wouldn't be surprised if it's also in the hands of other congressional committees.

I want to stress that I have NO idea if it is authentic, much less accurate. But I thought I would alert you to it in case, for some reason, it hasn't made its way to your people long ago. I'm happy to put you in touch with Shane, if you're interested in hearing his account of what it is, or I can just forward a copy to you.

Hope you're doing well. It was great seeing you a couple of weeks ago.

Happy New Year.
/b

Benjamin Wittes

Senior Fellow and Research Director in Public Law

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Offic

Mobi

If you want to send me encrypted communications, here is my PGP Public Key