

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN

Plaintiff,

vs.

CHRISTOPHER ELLIS BOUZY, BOT SENTIEL, INC,
GEORGE WEBB SWEIGERT

Defendants

Case No.:

**COMPLAINT FOR CONSPIRACY TO
DEFAME**

JURY TRIAL DEMANDED

Pro Se Jason Goodman (“Goodman”) alleges as follows, upon actual knowledge with respect to himself and his own acts, and upon information and belief as to all other matters.

NATURE OF THE ACTION

1. This civil action is for defamation, libel, tortious interference, and conspiracy to defame under federal, state, and/or common law.
2. Defendants deliberately and repeatedly published statements they knew to be false with the sole intent of harming Plaintiff.
3. Defendants’ statements were published to third parties, publicly posted on Twitter and elsewhere and widely publicized with the sole intent of damaging Plaintiff.
4. Defendants conspired to damage Plaintiff’s business and reputation and to publish false accusations of heinous crimes that rise to the level of defamation per se.

PARTIES

5. Plaintiff – Pro se Plaintiff Jason Goodman is a New York citizen, CEO of Multimedia System Design, Inc (“MSD”). Goodman is a documentary filmmaker, a journalist and is the creator of the social media property Crowdsourcing the Truth.

1 6. Defendant – Christopher Ellis Bouzy (“Bouzy”) is a New Jersey citizen and CEO of
2 Bot Sentinel, Inc an artificial intelligence technology company that is closely
3 integrated with Twitter.
4

5 7. Defendant – Bot Sentinel, Inc (“Bot Sentinel”) is a U.S. Corporation that claims to be
6 an online platform developed to detect and track trollbots and untrustworthy Twitter
7 accounts using artificial intelligence and machine learning among other things.

8 8. Defendant – George Webb Sweigert (“Webb”) is a Georgia citizen and a journalist.
9

10 JURISDICTION AND VENUE

11 9. This Court has subject matter jurisdiction over this action pursuant to Federal and
12 New York State tort law.

13 10. This Court has personal jurisdiction over Defendant, and venue is proper in the
14 Southern District of New York pursuant to 28 U.S.C. § 1391(b) and (c) and because
15 the Plaintiff is being harmed in this District; Defendant is conducting business in this
16 District; and Defendant is violating the Plaintiff’s rights in this District.
17

18 FACTUAL BACKGROUND

19 Defendant Christopher Bouzy (“Bouzy”) is the founder and CEO of Bot Sentinel, INC.
20 Botsentinel.com describes the following *“In 2018, Christopher Bouzy (@cbouzy) launched Bot*
21 *Sentinel to help fight disinformation and targeted harassment. We believe Twitter users should*
22 *be able to engage in healthy online discourse without inauthentic accounts, toxic trolls, foreign*
23 *countries, and organized groups manipulating the conversation.”* Bot Sentinel purports to be a
24 benevolent site that is free to use and is financially supported by donations from magnanimous
25 users. In fact, there is no artificial intelligence or machine learning behind Bot Sentinel. It is
26 merely a façade. Bot Sentinel is a money raising scam intended to build Bouzy’s credibility
27
28

1 while it hides his true purpose to defame and attack users on Twitter he or his clients dislike.
2 Bouzy uses the techniques he claims to monitor on Twitter to attack individuals and launch
3 vicious personally damaging harassment, defamation, and reputation destruction campaigns. Bot
4 Sentinel and Bouzy are engaged in a harassment for hire business model, and they serve clients
5 who call on them to do so. In or around December 2020, an individual named Benjamin Wittes
6 (“Wittes”) agreed to engage in a text-based interview with the Plaintiff over Twitter. These
7 exchanges are commonly referred to as “Ask Me Anything” or simply AMA sessions. Although
8 Wittes agreed to participate voluntarily, he avoided answering uncomfortable questions and
9 prematurely terminated the session when the Plaintiff raised evidence pertaining to a story that
10 had been previously covered on Wittes podcast and blog titled Lawfare. Wittes departure from
11 the online conversation was directly coincident with unwanted and insulting Twitter
12 communications from Defendant Bouzy. Prior to this interaction, the Plaintiff had never met
13 Bouzy and was totally unaware of him. Bouzy’s messages were filled with false claims so
14 offensive and insulting, they prompted Plaintiff to search the internet for Bouzy’s phone number.
15 After a lengthy phone call, Bouzy began a days long Twitter defamation campaign against
16 Plaintiff that included false, baseless, and unsubstantiated claims made by Bouzy alleging that
17 Plaintiff had committed the crime of rape. These heinous allegations are inherently damaging,
18 false and were clearly made with the sole intention of injuring Plaintiff’s reputation and business.
19 Not satisfied with mere reputation destruction, Bouzy took further steps to destroy the social
20 media accounts that he knew were critical to Plaintiff’s daily business operations. Despite these
21 horrendous actions, and due to Plaintiff demanding schedule, Plaintiff decided to ignore Bouzy
22 and put the harassment, defamation, and tortious interference out of mind. Almost one year
23 later, with no further provocation from Plaintiff, on December 17, 2021, Bouzy republished the

1 same series of defamatory tweets. While New York case law precedent has determined that
 2 mere republication of old claims is insufficient to extend the statute of limitations, Bouzy's most
 3 recent originally published defamatory statement was made on December 20, 2020 making this
 4 filing timely today.

6 DEFENDANTS AND THEIR WRONGFUL ACTS

7 11. On or around December 2020, Defendant Bouzy published a series of defamatory and
 8 libelous statements solely intended to harm Plaintiff.

9 12. On December 20, 2021, Bouzy published a tweet via his @cbouzy twitter account
 10 which stated "*Jason Goodman, the man who falsely accused Wittes of being part of a*
 11 *murder cover up, and called my cell after finding my number on the internet, sent me*
 12 *a cease and desist in DM. Jason doesn't want me tweeting that he threatened me not*
 13 *to tweet about his rape allegations...*" **(EXHIBIT A)**

14 13. During a private phone call just prior to the Twitter attack, Bouzy arbitrarily
 15 suggested he could find a person online who had accused the Plaintiff of rape, even
 16 though no person has ever made such an accusation aside from false statements made
 17 without evidence by Webb.

18 14. On or around May 2018, Webb published a video on YouTube that has since been
 19 deleted. In the video, Webb made the false allegation that the Plaintiff had raped then
 20 underage Somali fashion model Halima Aden ("Aden")
 21 (https://en.wikipedia.org/wiki/Halima_Aden).

22 15. Aden has since become world famous. She has become a fashion icon and a role
 23 model to young Muslim women around the world as the first supermodel to wear a
 24 hijab in the pages of Vouge, Sports Illustrated and other major publications.

1 16. Webb's claims were baseless, false, unsubstantiated, and ridiculous on their face.

2 Plaintiff has never raped any person or engaged in any violent crime. Plaintiff has
3 never met Aden. Plaintiff has never been romantically linked to a supermodel.
4

5 17. The allegations made by Plaintiff against Wittes are based in fact, supported by
6 evidence and have not been denied by anyone. Despite Defendant's definitive claim,
7 Plaintiff's allegations have not been proven false. Plaintiff is a documentary
8 filmmaker and journalist whose reputation for truthfulness is inherently valuable.
9

10 18. On or around December 17, 2021, coincident with a filing by Webb in Sweigert v
11 CNN (*See* Case 2:20-cv-12933-GAD-KGA ECF No. 35) Bouzy republished his 2020
12 defamatory statements intended to injure Plaintiff.

13 19. Plaintiff has submitted an Amicus Curiae brief in Sweigert v CNN that alleges
14 criminal activity on the part of Webb and others. (*See* Case 2:20-cv-12933-GAD-
15 KGA ECF No. 20)
16

17 20. On information and belief, Plaintiff alleges that Webb engaged Bouzy to harass and
18 defame Plaintiff in retaliation for the Amicus filing and to deliberately harm Plaintiff.
19

20 **FACTUAL ALLEGATIONS**

21 21. Defendant Bouzy made a false statement of fact with the deliberate intent of harming
22 Plaintiff. The statement amounts to per se libel because it accuses Plaintiff of a
23 heinous crime and is inherently understood to damage his reputation and standing as a
24 member of society.

25 22. Defendant Bouzy published his false statement to third parties on December 20, 2020,
26 making this pleading timely.
27
28

1 23. Third party responses on Twitter indicate that many members of the public believed
2 the defamatory statement and it generated public hatred toward Plaintiff.

3 24. Defendant Bouzy admitted he used these false statements as part of an effort to
4 destroy YouTube, Facebook and other social media accounts owned by Plaintiff.
5

6 25. Defendant Bouzy did this because he knew Plaintiff relied on for these social media
7 accounts for the operation of his business and to earn income.

8 26. Defendant Bouzy coordinated and conspired directly with Defendant Webb, utilizing
9 false and defamatory information originally published by Webb. Bouzy made no
10 reference to the original publication but made his own new publication of unqualified
11 false statements of fact.
12

13 **FIRST CAUSE OF ACTION**

14 **Defamation**

15 27. Plaintiff incorporates by reference each and every allegation set forth in the
16 preceding paragraphs as if fully stated herein.
17

18 28. Defendants made false and defamatory statements about the Plaintiff.

19 29. At the time the Defendants made these statements, the Defendants knew the
20 statements to be false and defamatory.

21 30. At the time the Defendants made these statements, the Defendants knew the
22 statements to be false and defamatory.
23

24 31. At the time the Defendants made these statement, the Defendant knew the
25 statements to be false and defamatory.

26 32. Defendants made these false and defamatory statements solely out of malice, to
27 malign and injure the Plaintiff.
28

1 33. These statements were made to others and for public consumption on the social
2 media microblogging platform Twitter.

3 34. Members of the public including thousands of Defendants' Twitter followers and
4 dozens of commenters saw, read and acknowledged or responded to Defendants' false
5 and defamatory statements.
6

7 35. As a direct result of these malicious false statements, Plaintiff suffered harm to his
8 reputation, career opportunities and income in an amount to be determined at trial.
9

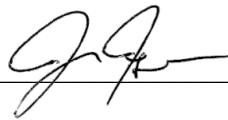
10 **PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiff prays the Court will enter judgement in his favor for the
12 following relief:

- 13 1. Declaring that the Defendants statements were libelous and defamatory.
14 2. For money damages for all economic losses including, but not limited to,
15 lost, past and future earnings; and for compensatory damages; and for punitive
16 damages; and for interest at the maximum legal rate on all sums awarded; and for
17 such other and such further relief as the Court deems just and proper.
18
19
20

21 Signed this 13th day of December 2021

22 Respectfully submitted,

23 

24 Jason Goodman, Plaintiff, Pro Se
25 252 7th Avenue Apt 6s
26 New York, NY 10001
27 (323) 744-7594
28 truth@crowdsourcethetruth.org

(EXHIBIT A)



Home

Explore

Notifications

Messages

Bookmarks

Lists

Profile

More

Tweet

Thread



Christopher Bouzy
@cbouzy

Jason Goodman, the man who falsely accused Wittes of being part of a murder cover up, and called my cell after finding my number on the internet, sent me a cease and desist in DM. Jason doesn't want me tweeting that he threatened me not to tweet about his rape allegations...



8:13 AM · Dec 20, 2020 · Twitter for Android

43 Retweets 2 Quote Tweets 242 Likes



Tweet your reply

Reply



Christopher Bouzy · Dec 20, 2020
Replying to @cbouzy

Until creepy Jason Goodman called me, I had no clue someone previously accused him of rape, and it's a bizarre thing to tell a stranger in a phone call. It's also odd to tell someone they would be part of ongoing litigation if they tweeted about it. Why bring it up?...

4

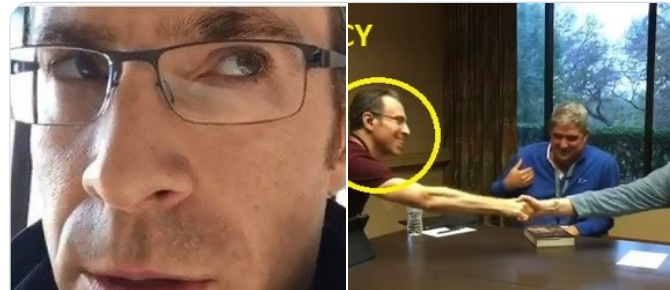
9

128



Christopher Bouzy · Dec 20, 2020
The first photo is a selfie of creepy Jason Goodman. Yikes!!! 🤔

The second photo is Jason Goodman with Sidney Powell. 🤔



ChrisBouzy4Jail
@ChrisBouzy4Jail



Search Twitter

Relevant people



Christopher Bouzy
@cbouzy

When I was 9, I started cc Mattel Aquarius computer developed several products & 30s, and then in 2018 I [BotSentinel.com](https://bot-sentinel.com)

What's happening

NFL · 1 hour ago

The San Francisco 49ers face off against the Atlanta Falcons at Levi's Stadium

Trending with [Niners](#), [Falcons](#)

Trending in United States

Snoop

Rapper Snoop Dogg joins NBC's coverage of the upcoming Sunday Night Football showdown between the Saints and Buccaneers

13.2K Tweets

NFL · Trending

#BillsMafia

The Buffalo Bills win 31-14 at home Carolina Panthers

15.4K Tweets

Politics · This afternoon

Senator Joe Manchin says he won't support Build Back Better plan

Trending with [Joe Manchin](#), [West Virginia](#)

NFL · 4 hours ago

The Pittsburgh Steelers and Tennessee Titans face off at Heinz Stadium

Trending with [Steelers](#)

[Show more](#)

[Terms of Service](#) [Privacy Policy](#) [Cookie](#)
[Accessibility](#) [Ads info](#) [More](#) ...
© 2021 Twitter, Inc.



8
11
106



Christopher Bouzy @cbouzy · Dec 20, 2020

Creepy Jason Goodman uploaded our conversation to bitchute, and then he tweeted @ me with his personal account after I blocked his "company" account. This man is definitely unstable. 🤪

professional non @cbouzy to harass them is he deliberately ignoring facts attempting to push a false narrative?



Cold Case: Revisiting the Strange Death of Peter Smith with Guests...
youtube.com

Jason Goodman @JasonGo38450754 · 29m

Replying to @cbouzy

only a coward blocks a person & then continues to smear them with lies. Chris Bouzy & @BotSentinel have no integrity. He's more focused on being an internet troll than identifying them. Why is he so desperate for me to stop talking about Peter Smith?



TROLL PROTECTING BEN WITTES?

WATCH



229 11 1

First published at 07:56 UTC on December 20th, 2020.

Subscribe

10
7
65



Christopher Bouzy @cbouzy · Dec 20, 2020

Creepy Jason Goodman called my cell, secretly recorded our conversation, followed me on Twitter, uploaded our conversation to BitChute, and then used his personal account to tweet @ me after I blocked his other account. Now imagine how he treats women who tell him no. Yikes!!! 🤪

5
7
96



Christopher Bouzy @cbouzy · Dec 20, 2020

Yikes!!! After blocking 2 of creepy Jason Goodman's accounts, he is now tweeting @ me with a 3rd account. He is accusing me of being a stalker while cyberstalking me. Now I understand what it must feel like for women to have to deal with weirdos like this on the internet. 🤪



21st Century 3D @21C3D · 8m

Chris Bouzy makes up lies & hurls baseless insults to smear people online, he is nothing but a cyber bully & stalker. His sham organization @BotSentinel is more likely used to weaponize bots than detect them for security purposes



Christopher Bouzy @cbouzy · 4h

Replying to @cbouzy

The first photo is a selfie of creepy Jason Goodman. Yikes!!! 🤪

The second photo is Jason Goodman with Sidney Powell. 🧐





21st Century 3D @21C3D · 10m

cowards & bullies smear people with lies & block them so they can't defend themselves. Men of integrity confront their

8
9
86

9
14
104

**Jersey Girl** @ablemma73 · Dec 20, 2020
Replying to @cbouzy
That cease and desist over a DM is something. 🙄

**Denise Engert** @DeniseEngert · Dec 20, 2020
He probably took the The Kraken Releaser's class "How to law".

**Kris Powell** @P5Mom · Dec 20, 2020
Replying to @cbouzy
So he brought the Kraken to your virtual doorstep. Last night was some crazy shit. What ARE these people on??

**Christopher Bouzy** ✓ @cbouzy · Dec 20, 2020
It's a gift. He makes money from peddling this nonsense.

**Ezra is Here** @EzraHasOpinions · Dec 20, 2020
Replying to @cbouzy
You have a way of attracting the most "interesting" people 🙄🙄