

CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

JOHN PAUL MAC ISAAC  
1805 Delaware Ave.  
Wilmington, DE 19806,

Plaintiff,

v.

Case No. \_\_\_\_\_

1781

ADAM BENNETT SCHIFF  
8204 Windsor View Terrace  
Potomac, Maryland 20854,

and

CABLE NEWS NETWORK, INC.  
Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

and

THE DAILY BEAST COMPANY LLC  
Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

and

POLITICO LLC  
Corporate Service Company  
251 Little Falls Drive  
Wilmington, DE 19808,

Defendants.

COMPLAINT

COMES NOW, PLAINTIFF JOHN PAUL MAC ISAAC (hereinafter, "Plaintiff"), by  
and through undersigned counsel hereby sues Defendants and alleges as follows:

### **A. PARTIES, JURISDICTION & VENUE**

1. This is an action for defamation, defamation per se, aiding and abetting defamation, and civil conspiracy to commit defamation and requests damages in excess of seventy-five thousand and 00/100 dollars (\$75,000.00).

2. Plaintiff John Paul Mac Isaac (“Plaintiff”) is an individual over the age of 18 who is *sui juris* and resides in Wilmington, Delaware.

3. Defendant Adam Bennett Schiff (“SCHIFF”), being sued in his individual capacity, is an individual over the age of 18 who is *sui juris* and resides part-time and, upon information and belief, as a result of his residency, has substantial contacts in Montgomery County, Maryland. SCHIFF is the United States Representative for the 28<sup>th</sup> District of California and was, at the time of the actions giving rise to this Complaint, the Chairman of the House of Representatives Permanent Select Committee on Intelligence.

4. Defendant Cable News Network, Inc. (“CNN”) is a Delaware corporation that provides televised and internet-based news and commentary to cable television subscribers and the general public.

5. Defendant The Daily Beast Company LLC (“DAILY BEAST”) is a Delaware limited liability company that provides written tabloid-style news and commentary services to the general public.

6. Defendant Politico LLC (“POLITICO”) is a Delaware limited liability company that purportedly provides news and information services at the intersection of politics and policy to the general public.

7. Personal jurisdiction over SCHIFF is proper pursuant Md. Cts. & Jud. Proc. §6-102(a) and 6-103(b).

8. Personal jurisdiction over all other Defendants is proper pursuant to Md. Cts. & Jud. Proc. §6-103(b).

9. Venue is proper in this county pursuant to Md. Cts. & Jud. Proc. §6-201(b) as SCHIFF resides in, owns real property in, and maintains substantial ties to Montgomery County.

**B. FACTS APPLICABLE TO ALL COUNTS**

10. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 9.

11. Plaintiff is a private citizen who currently resides in Wilmington, Delaware.

12. Plaintiff owned a small business named The Mac Shop, Inc. (the “Mac Shop”) which was a Delaware corporation.

13. Plaintiff was in the business of repairing Mac computers.

14. Plaintiff derived all of his income from the Mac Shop.

15. Plaintiff was a trusted and respected part of the community in Wilmington, Delaware.

16. Plaintiff had a loyal customer-base who would refer others to his shop to fix their Macs.

17. On or about April 12, 2019, Mr. Hunter Biden (“BIDEN”) was referred to Plaintiff’s shop to fix some damaged Macs.

18. On April 12, 2019, BIDEN asked to recover information from the damaged Mac computers. Copy of Repair Authorization attached as EXHIBIT A.

19. On or about April 13, 2019, at Plaintiff’s request, BIDEN returned to the Mac Shop with a Western Digital external hard drive to which Plaintiff could transfer the recovered data.

20. Later that same day, on or about April 13, 2019, Plaintiff completed the recovery and called BIDEN to notify him of such and to request that he retrieve his recovered data.

21. On or about April 17, 2019, Plaintiff sent an electronic invoice to BIDEN in the amount of \$85.00.

<b>Date</b>	<b>Customer</b>	<b>ID</b>	<b>Title</b>	<b>Status</b>	<b>Amount</b>
04/17/20...	Hunter Biden	6077 Not viewed	The Mac Shop Inv...	Overdue By 602	\$85.00 ***

22. Plaintiff reached out to BIDEN at least one more time thereafter to request that he pay his invoice and retrieve his recovered data.

23. BIDEN never returned to the Mac Shop to retrieve his recovered data nor did he pay his invoice.

24. Pursuant to the terms of the Repair Authorization signed by BIDEN, “[e]quipment left with the Mac Shop after 90 days of notification of completed service will be treated as abandoned and you agree to hold the Mac Shop harmless for any damage or loss of property.”

25. Starting in late July 2019 to October 14, 2020, Plaintiff had multiple interactions with the Federal Bureau of Investigation (the “FBI”), U.S. Congressional staff members, and Mr. Robert Costello, Esquire (“COSTELLO”), attorney for Rudolph Giuliani, Esquire (“GIULIANI”).

26. On or about December 9, 2019, the FBI served a federal grand jury subpoena on Plaintiff requiring he turn over the laptop and hard drive, which Plaintiff did on that day. Copy of subpoena attached as EXHIBIT B.

27. In August 2020, Plaintiff connected with COSTELLO to whom he provided a copy of the recovered data.

28. Plaintiff specifically asked COSTELLO to not identify him to GIULIANI or anyone else when discussing the recovered data as Plaintiff desired to remain anonymous.

29. Upon information and belief, COSTELLO followed Plaintiff's wishes.

30. After August 26, 2020, but prior to October 14, 2020, upon information and belief, GIULIANI provided information from the recovered data to the New York Post newspaper ("NY POST").

31. On October 13, 2020, Plaintiff received a call from Mr. George Mesires,<sup>1</sup> identifying himself as BIDEN's attorney, asking if Plaintiff still had possession of his client's laptop and following up thereafter with an email to the Plaintiff.

32. On October 14, 2020, at approximately 5:00 AM, the NY POST published an exposé about the contents of BIDEN's recovered data. Shortly thereafter, the NY POST "updated" the online version of the exposé.

33. As a direct result of the NY POST exposé, public emotions were heightened and many in the general public, the media, and the government began to either defend or attempt to refute the exposé. The NY POST exposé fueled a rise in anger and hatred between the different political movements. The Plaintiff quickly became the target of accusations by those who sought to cast doubt on the findings in the laptop and the laptop itself.

34. Plaintiff was not involved in the disclosure of the recovered data to the NY POST, did not promote the disclosure in any way, nor did the Plaintiff authorize the disclosure.

35. While Plaintiff verified how he came into possession of the recovered data to the NY POST, Plaintiff was unaware of the details of the NY POST exposé, when the NY POST

---

<sup>1</sup> George Mesires is a partner in the Chicago office of Faegre Drinker Biddle & Reath LLP.

exposé was going to be published, and Plaintiff explicitly told the NY POST that he did not want to be identified.

36. Plaintiff did not authorize the disclosure of his identity by GIULIANI, COSTELLO, or the NY POST, did not authorize the disclosure of the information, nor was he involved in any determinations or strategy regarding the disclosure of the information.

37. Plaintiff was not explicitly identified in the NY POST exposé but was, instead, referred to as the Delaware computer repair shop “store’s owner.”

38. NY POST, as part of its original publication of the exposé and without the consent of Plaintiff, published a photo of the Repair Authorization without blurring the business name thereby notifying the public and the media where BIDEN had dropped off his laptop.

39. Also on October 14, 2020, subsequent to the NY POST’s disclosure of the Plaintiff’s identity, other media outlets, including writers from the DAILY BEAST purportedly investigating the NY POST exposé, interviewed and wrote a damaging article about the Plaintiff. Copy of Daily Beast article about Plaintiff attached as EXHIBIT C.<sup>2</sup>

40. In an attempt to clarify the inaccuracies about the Plaintiff published in the article by the Daily Beast, Plaintiff’s counsel wrote a statement and approached media outlets with that statement. The Wall Street Journal did not return communications from Plaintiff’s counsel and the Washington Post responded that they do not think the statement “would be a good fit” for the news organization. Copy of clarifying statement by Plaintiff’s counsel attached as EXHIBIT D and email from Washington Post attached as EXHIBIT E.

---

<sup>2</sup> The DAILY BEAST article was the result of Plaintiff being accosted by a group of journalists asking him questions about his involvement in the NY POST exposé. Plaintiff, concerned about his and his family’s wellbeing, attempted to respond in ways that would protect them but, not having ever been the subject of media inquiry, his responses come across as confused and contradictory. In fact, his seemingly confused and contradictory statements were made as a result of his inexperience with the media and his lifelong status as a private figure.

41. On or about October 19, 2020, a “Public Statement on the Hunter Biden Emails,” signed by more than 50 former intelligence officials was released stating that the information contained in the NY POST expose has “all the classic earmarks of a Russian information operation,” but that they “do not know if the emails...are genuine or not and that [they] do not have evidence of Russian involvement...” Public Statement attached as EXHIBIT F.

42. Upon information and belief, the Public Statement was issued to influence American voters to vote for then-candidate, now President, Joseph R. Biden and offered no actual evidence of the claims that Russia was involved in the release of the information from Hunter Biden’s laptop.

43. Plaintiff is not a Russian agent nor is he a participant in a Russian disinformation campaign.

44. On or about October 30, 2020, Plaintiff’s clarifying statement was published by justthenews.com for all to read.<sup>3</sup>

**C. COUNT I: DEFAMATION AND DEFAMATION PER SE**  
**ADAM BENNETT SCHIFF, INDIVIDUALLY**

45. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 44.

46. SCHIFF, individually, was actively involved in fundraising for the 2020 Presidential campaign of Joseph R. Biden, Jr. Articles outlining Defendant’s fundraising efforts attached as EXHIBIT G.

47. The laptop held information that could have hurt the political campaign of then-Presidential candidate, now President, Joseph R. Biden Jr, for whom SCHIFF spent significant

---

<sup>3</sup> <https://justthenews.com/accountability/russia-and-ukraine-scandals/lawyer-delaware-shop-owner-fbi-initially-turned-down#article>

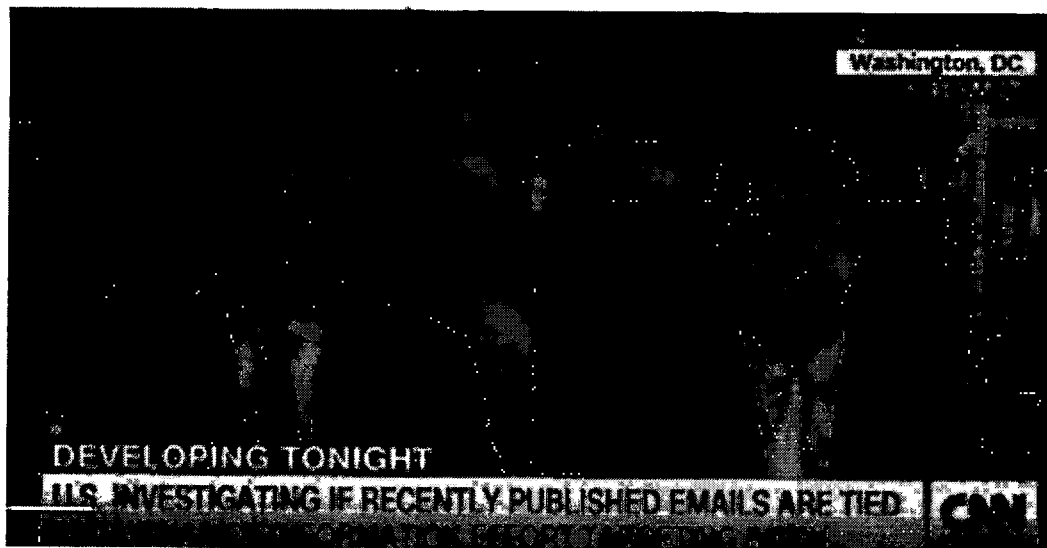
time campaigning. According to a poll conducted by the Media Research Center, nearly 9.4% of Biden voters would not have voted for him had they known about the full extent of the scandal.<sup>4</sup>

Even more Biden voters (45.1%) said they were unaware of the financial scandal enveloping Biden and his son, Hunter (a story infamously censored by **Twitter** and **Facebook**, as well as **ignored by the liberal media**). According to our poll, full awareness of the Hunter Biden scandal would have led 9.4% of Biden voters to abandon the Democratic candidate, flipping all six of the swing states he won to Trump, giving the President 311 electoral votes.

48. Upon information and belief, SCHIFF knowingly fomented further anger and hatred against the Plaintiff (among others) in his defense of Presidential-candidate, Joseph R. Biden, Jr., and his attempt to “kill” the story.

49. On or about October 16, 2020, at 6:40 pm EST, SCHIFF was interviewed by broadcaster, Wolf Blitzer (“BLITZER”), on CNN as part of CNN’s show, the *Situation Room with Wolf Blitzer* (the “Interview”). The *Situation Room with Wolf Blitzer* attracts a very large world-wide audience. Transcript attached as EXHIBIT H.

50. The Interview was conducted live “via Cisco Webex” with BLITZER in New York and SCHIFF, seemingly at his home in Potomac, Maryland.



<sup>4</sup> <https://www.newsbusters.org/blogs/nb/rich-noyes/2020/11/24/special-report-stealing-presidency-2020>



51. BLITZER's first question to SCHIFF was:

"Does it surprise you at all that this information that Rudy Giuliani is peddling very well could be connected to some sort of Russian Government disinformation campaign?"

52. SCHIFF's response to BLITZER's question was:

***"Well we know that this whole smear on Joe Biden comes from the Kremlin. That's been clear for well over a year now that they've been pushing this false narrative about the Vice President and his son. And, you know, the idea that the President, that the White House Counsel, and others were made aware that Giuliani was being used by Russian intelligence and using Russian intelligence in the sense of meeting with an agent of the Kremlin and pushing out this Kremlin false narrative..."*** *Emphasis added.*

53. Defendant continued with:

***"But clearly, the origins of this whole smear are from the Kremlin..."*** *Emphasis added.*

54. Later in the interview, BLITZER, in what seems to be an attempt to bolster the SCHIFF's credentials and the veracity of the SCHIFF's statements, said:

"Have you, as a member of the Gang of Eight, the top leadership in Congress, the Senate, and the House, and members of the Intelligence Committee, have you been formally briefed on what the Russians are up to right now in trying to peddle this kind of information?"

55. SCHIFF's response:

"Well, I was in the Intelligence Committee today to see what the latest was, and frankly, ***we haven't gotten much from the intelligence community very recently***, which concerns me. They have at times, some of the leadership, like Director [of National Intelligence] Ratcliffe, not been very forthcoming in terms of the intelligence on the Russian threat and been promoting this false equivalence with other countries.

So, you know, I wish I could tell you more, Wolf. I wish the intelligence community was able to tell the public more.

***But we do know this: the Russians are once again actively involved in trying to denigrate the Vice President..."*** *Emphasis added.*

56. Director of National Intelligence Ratcliffe, on October 19, 2020, repudiated SCHIFF's claims during an interview on *Fox News Mornings with Maria* by stating the following:

**"Let me be clear, the intelligence community doesn't believe [that the Hunter Biden laptop situation is part of a Russian disinformation campaign] because there is no intelligence that supports that [assertion] and *we have shared no intelligence with Chairman Schiff or any other member of Congress that Hunter Biden's laptop is part of some Russian disinformation campaign.* It's simply not true..." *Emphasis added.***

57. According to the Director of National Intelligence and upon information and belief, SCHIFF did not have any evidence and did not receive any report stating that the information contained in the NY POST exposé was part of a Russian disinformation campaign.

58. The information contained in the NY POST exposé came from BIDEN who voluntarily left his laptop with the Plaintiff and failed to return to retrieve it.

59. This is not the first time SCHIFF has knowingly made false statements about Russia's involvement in United States politics. *See* Wall Street Journal editorial opinion attached as EXHIBIT I.

60. SCHIFF had not received reports that the Hunter Biden laptop information was part of a Russian disinformation campaign, therefore, SCHIFF knowingly and intentionally made the false statements that the information contained in the NY POST exposé, originally obtained by the Plaintiff, was part of a Russian disinformation campaign.

61. SCHIFF's statements were not made during a Congressional debate or committee proceeding.

62. SCHIFF was not carrying out any of his enumerated legislative powers at the time of his interview.

63. SCHIFF was not carrying out any of his implied powers as a member of Congress.

64. SCHIFF's job description as a member of Congress does not include knowingly conveying false information to the public.

65. Upon information and belief, SCHIFF's statements were made from his home in Potomac, Maryland after normal working hours.

66. SCHIFF had significant involvement in the Presidential campaign of Joseph R. Biden, Jr which included hosting fundraisers for the candidate and speaking on the candidate's behalf.

67. SCHIFF's false statements were, in fact, campaign speech and not speech associated with his Congressional duties, which would not involve lying to the American public about something so sensational.

68. SCHIFF knowingly conveyed false information with the intent to promote the election of Joseph R. Biden, the candidate most vulnerable because of the NY POST exposé.

69. Plaintiff was the individual who obtained the information from BIDEN that was eventually published by the NY POST, his identity had been revealed by the NY POST prior to SCHIFF's interview, and Plaintiff's name was, at that time, and remains synonymous with Hunter Biden's laptop.

70. SCHIFF's actions and campaign statements had the specific intent to communicate to the world that the information presented in the NY POST exposé was part of a Russian disinformation campaign.

71. SCHIFF's actions and campaign statements had the specific intent to communicate to the world that the Plaintiff is a Russian agent and/or a participant in a Russian disinformation campaign.

72. The SCHIFF, through his conduct of knowingly conveying false campaign statements to a world-wide audience, was encouraging listeners to take action against those who released this information, which specifically included the Plaintiff.

73. Plaintiff, as a direct result of SCHIFF's campaign statements, has lost his good reputation in the community, is now widely considered either a Russian agent or a participant in a Russian disinformation campaign as shown by the attached Yelp Reviews and personal emails/threats received. Yelp reviews attached as EXHIBIT J and personal threats attached as EXHIBIT K.

74. Further evidence of the harm suffered by Plaintiff as a direct result of SCHIFF's false campaign statements is that the Plaintiff lost his loyal client-base and, as a result, had to close his business.

75. SCHIFF made the false and defamatory campaign statements to the *Situation Room's* worldwide audience without privilege to do so.

76. SCHIFF's false and defamatory campaign statements accuses the Plaintiff of committing an infamous crime, i.e., treason by working with the Russians to commit a crime against the United States of America by attempting to undermine American democracy and the 2020 Presidential election.

77. As a direct and proximate result of the false and defamatory campaign statements made by SCHIFF, Plaintiff has suffered, and continues to suffer, substantial damages, including having to close his business.

78. SCHIFF's false and defamatory campaign statements are of the kind that would tend to, and in fact did, prejudice the Plaintiff in the eyes of a substantial and respectable portion of the community at large.

79. SCHIFF acted with actual malice toward the Plaintiff in that he acted with knowledge that his statements were false or, at the very least, he acted with reckless disregard to the harm his knowingly defamatory false campaign statements would have on the Plaintiff, both personally and as a small business owner.

80. SCHIFF's false and defamatory campaign statements have subjected and continue to subject the Plaintiff to distrust, scorn, ridicule, hatred, and contempt. As such, the defamatory statements constitute defamation *per se*.

81. Alternatively, SCHIFF knew or should have known the significant impact his defamatory false campaign statements would have on the Plaintiff who was the source of the information.

82. At the very least, SCHIFF was grossly negligent in making his defamatory false statements about the Plaintiff.

**Prayer for Relief**

WHEREFORE, the Plaintiff JOHN PAUL MAC ISAAC prays for judgment against the Defendant ADAM BENNETT SCHIFF as follows:

- (a) Awarding Plaintiff all compensatory damages in excess of \$75,000 as a result of SCHIFF's wrongdoing in an amount to be determined at trial;
- (b) Awarding Plaintiff punitive damages as a result of SCHIFF's wrongdoing in an amount to be determined at trial;
- (c) Awarding Plaintiff pre- and post-judgment interest;

(d) Awarding Plaintiff all attorneys' fees and costs associated with litigating this case;

(e) Requiring all Defendants to make a public retraction of all false statements and to issue a public apology to Plaintiff; and

(f) Such further relief as this Court deems just and proper.

**D. COUNT 2: DEFAMATION AND DEFAMATION PER SE**  
**CNN**

83. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 82.

84. On or about October 16, 2020, at 6:40 pm EST, CNN televised the Interview between SCHIFF and BLITZER.

85. During the Interview, SCHIFF made false and defamatory campaign statements indicating that he had confirmed that the source of the information from the laptop was Russia.

86. Plaintiff was the known source of the information from the laptop, not Russia.

87. CNN knew Plaintiff was the source of the information as it had published an article referencing an interview with Plaintiff on October 14, 2020.<sup>5</sup> In that article, it said:

That shop employee has been identified as John Paul Mac Isaac. He spoke to CNN on Thursday in Wilmington. Mac Isaac said that in April 2019 someone claiming to be Hunter Biden brought in a damaged laptop computer to retrieve the data on it. This required him to manually transfer the computer's data to a separate hard drive, Mac Isaac said, which is how he came to see what some of the files contained.

88. Despite the fact that CNN knew Plaintiff was the source of the information, it broadcast the Interview SCHIFF during which Plaintiff was defamed.

89. CNN boasts a viewership of over 700,000 viewers each week.<sup>6</sup>

<sup>5</sup> [https://lite.cnn.com/en/article/h\\_7e5fcdffc7051ba1d73b135ee16f5b3b](https://lite.cnn.com/en/article/h_7e5fcdffc7051ba1d73b135ee16f5b3b)

<sup>6</sup> <https://www.adweek.com/tvnewser/week-of-march-28-basic-cable-ranker-fox-news-improves-to-no-1-in-total-primetime-viewers/504622/>

***Week of March 28, 2022 cable news ratings, Monday-Sunday (Nielsen live-same-day data):***

<b>PRIME</b>	<b>Fox News</b>	<b>MSNBC</b>	<b>CNN</b>
• Total Viewers:	<b>2,529,000</b>	1,129,000	731,000
• A25-54:	<b>380,000</b>	129,000	182,000

90. CNN broadcast the Interview without privilege to do so to its over 700,000 viewers.

91. The statements broadcast on CNN are of the kind that would tend to, and in fact did, prejudice the Plaintiff in the eyes of a substantial and respectable portion of the community at large.

92. CNN knew the story behind the Hunter Biden laptop having spoken with Plaintiff and written about the Plaintiff two days prior.

93. As CNN knew the story behind the Hunter Biden laptop but broadcast the Interview anyway, CNN acted with actual malice toward the Plaintiff.

94. Alternatively, CNN broadcast the false statements about Plaintiff with reckless disregard for the harm the false statements would cause to the Plaintiff.

95. CNN knowingly broadcast the falsehoods to third parties – its over 700,000 viewers.

96. CNN knew or should have known such false statement would likely result in material and substantial injury to Plaintiff, as the statement accuses the Plaintiff of knowingly participating in a Russian scheme to disrupt the presidential elections in the United States of America.

97. CNN's broadcast of the false statements have subjected and continue to subject the Plaintiff to distrust, scorn, ridicule, hatred, and contempt. As such, the defamatory statements constitute defamation *per se*.

98. CNN's broadcast of the false statement accuses the Plaintiff of committing an infamous crime, i.e., treason by working with the Russians to commit a crime against the United States of America by attempting to undermine American democracy and the 2020 Presidential election.

99. As a direct and proximate result of the defamatory statements broadcast by CNN, Plaintiff has suffered, and continues to suffer, substantial damages, including having to close his business.

100. Upon information and belief, CNN executives told employees not to cover the Hunter Biden story.<sup>7</sup>

101. Instead, CNN continually broadcast the false and defamatory story about the laptop being part of a Russian disinformation campaign designed to influence the 2020 United States Presidential elections.

102. It is clear by its broadcasts, CNN intended to harm the Plaintiff and the other parties associated with the release of information from the laptop by broadcasting the false and defamatory statements.

103. CNN acted with actual malice toward the Plaintiff in that it acted with knowledge that the statements were false or, at the very least, acted with reckless disregard to the harm the knowingly defamatory false campaign statements would have on the Plaintiff, both personally and as a small business owner.

---

<sup>7</sup> <https://nypost.com/2020/12/02/cnn-caught-burying-the-posts-hunter-biden-expose-devine/>



104. CNN had actual knowledge of the falsity of the claims and understood the high probability that injury or damage would result to Plaintiff and; despite such knowledge, broadcast the false and defamatory statement and has issued no apology to the Plaintiff such as would repair that damage.

105. In the alternative, CNN's actions, as described above, were so reckless or wanting in care that they constituted a conscious disregard or indifference to the rights of Plaintiff.

**Prayer for Relief**

WHEREFORE, the Plaintiff JOHN PAUL MAC ISAAC prays for judgment against the Defendant CABLE NEWS NETWORK, INC. as follows:

(a) Awarding Plaintiff all compensatory damages in excess of \$75,000 as a result of CNN's wrongdoing in an amount to be determined at trial;

(b) Awarding Plaintiff punitive damages as a result of CNN's wrongdoing in an amount to be determined at trial;

(c) Awarding Plaintiff pre- and post-judgment interest;

(d) Awarding Plaintiff all attorneys' fees and costs associated with litigating this case;

(e) Requiring all Defendants to make a public retraction of all false statements and to issue a public apology to Plaintiff; and

(f) Such further relief as this Court deems just and proper.

**E. COUNT 3: DEFAMATION AND DEFAMATION PER SE**  
**THE DAILY BEAST**

106. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 44.

107. DAILY BEAST's first story about Plaintiff on October 14, 2020, sought to prejudice the Plaintiff in the eyes of the national community resulting from a hostile interview

between DAILY BEAST “reporters” and Plaintiff. *See* EXHIBIT C. At the time, Plaintiff had never given an interview and was unsure how to answer questions without divulging information about his father, who helped him and whom he wanted to protect.<sup>8</sup> DAILY BEAST used his inexperience and nervousness against him by pressing him with leading questions.

108. On October 19, 2020, DAILY BEAST published an article, FBI Examining Hunter’s Laptop as Foreign Op, Contradicting Trump’s Intel Czar,” in which it referred to the laptop as “the purloined laptop” (“October 19<sup>th</sup> Article”).<sup>9</sup>

109. On October 21, 2020, Plaintiff, by and through counsel, issued a cease-and-desist letter to DAILY BEAST responding to the negative things being said about Plaintiff and warning to not print any false and defamatory information about the Plaintiff. Copy of cease-and-desist Letter to DAILY BEAST attached as EXHIBIT L.

110. The October 19<sup>th</sup> Article was in violation of the cease-and-desist as it described the laptop as “purloined” (stolen).

111. To date, no retraction has been issued.

112. On December 9, 2020, DAILY BEAST published another article identifying the Hunter Biden laptop as a stolen laptop (“December 9<sup>th</sup> Article”):

## ***The Seeds of Hunter Biden’s Current Legal Woes Were Found on His Stolen Laptop***

| TROUBLE AHEAD, TROUBLE BEHIND |

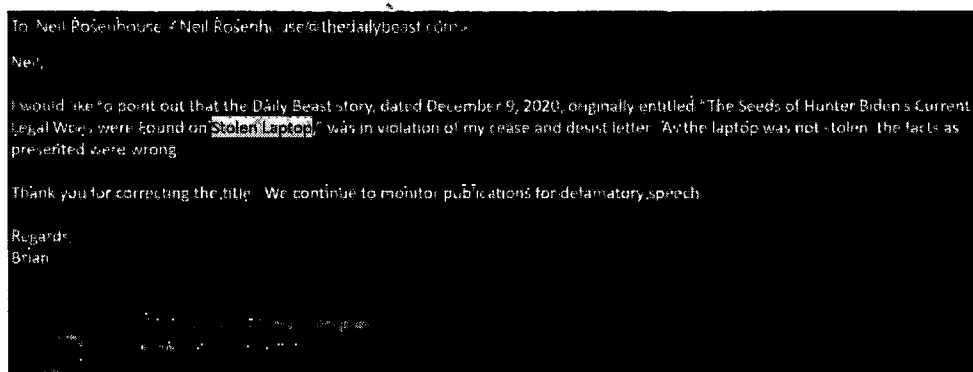
---

<sup>8</sup> This interview would be cited by many in the media, often casting it and the Plaintiff as “bizarre.”

<sup>9</sup> <https://www.thedailybeast.com/fbi-examining-hunter-bidens-laptop-as-foreign-op-contradicting-john-ratcliffe-trumps-intel-czar>

113. DAILY BEAST knew, or should have known, that the laptop was not stolen as Plaintiff's clarifying statement had been issued on or about October 30, 2020.

114. On December 14, 2020, after being made aware of the headline, Plaintiff's counsel sent an email to the General Counsel of DAILY BEAST notifying him of the headline and its incorrect implication (that the laptop was stolen) and asking him to have the headline corrected:



115. Soon thereafter, DAILY BEAST corrected the headline:

## ***The Seeds of Hunter Biden's Current Legal Woes Were Found on His Laptop***

**TROUBLE AHEAD, TROUBLE BEHIND**

116. However, DAILY BEAST retained the web address associated with the December 9<sup>th</sup> Article, failing to correct it:

[thedailybeast.com/the-seeds-of-hunter-bidens-current-legal-woes-were-found-on-his-stolen-laptop](https://thedailybeast.com/the-seeds-of-hunter-bidens-current-legal-woes-were-found-on-his-stolen-laptop)

117. To date, the web address has not been corrected.

118. DAILY BEAST article web addresses always contain the entire title of the article.

119. DAILY BEAST knew, or should have known, that the web address for the article also contained the false and defamatory headline since its usual practice is to place the entire title of the article in the web address.

120. In order to pass the December 9<sup>th</sup> Article to someone, a user must copy and paste the web address or use another tool to copy the web address into the message.

**The Seeds of Hunter Biden's Current Legal Woes Were Found on His Laptop**  
<https://www.thedailybeast.com/the-seeds-of-hunter-bidens-current-legal-woes-were-found-on-his-stolen-laptop?source=twitter&via=desktop> via @thedailybeast



121. The web address clearly shows the false and defamatory statement by the DAILY BEAST.

122. Plaintiff acquired the laptop directly from BIDEN who then failed to return to pick it up.

123. Pursuant to the policies of The Mac Shop, any items not picked up within 90 days becomes the property of The Mac Shop. BIDEN acknowledged and agreed to this policy when he signed the repair authorization.

124. DAILY BEAST was well aware of how the Plaintiff obtained the laptop.

125. DAILY BEAST has made multiple false statements about the Plaintiff in both the October 19<sup>th</sup> Article and the December 9<sup>th</sup> Article without privilege to do so.

126. The false and defamatory statements about the Plaintiff by the DAILY BEAST accused the Plaintiff of committing the crime of theft.

127. The false and defamatory statements made by DAILY BEAST were made negligently; without reasonable care as to its truth or falsity; with knowledge of its falsity; and/or with reckless disregard for the truth.

128. DAILY BEAST boasts of more than 1 million readers per day.

## ***About Us***

Independent. Irreverent. Intelligent. The Daily Beast delivers award-winning original reporting and sharp opinion in the arena of politics, pop-culture and power. Always skeptical but never cynical, **The Daily Beast reaches more than 1 million readers a day.** Tracy Connor is Editor in Chief and Heather Dietrick is CEO. The Daily Beast is based in New York and is an operating business of IAC (NASDAQ: IACI).

129. The defamatory statements made by DAILY BEAST were written, without privilege, and communicated to third parties – DAILY BEAST’s more than 1 million readers per day.

130. DAILY BEAST’s statements are of the kind that would tend to, and in fact did, prejudice the Plaintiff in the eyes of a substantial and respectable portion of the community at large.

131. DAILY BEAST knew the story behind the Hunter Biden laptop having spoken with Plaintiff and written about the Plaintiff prior to December 9, 2020.

132. As evidenced in the prejudicial October 14, 2020 article, DAILY BEAST acted with actual malice toward the Plaintiff in that it acted with knowledge that the statements were false or, at the very least, acted with reckless disregard to the harm the knowingly defamatory false campaign statements would have on the Plaintiff, both personally and as a small business owner.

133. DAILY BEAST knowingly communicated the falsehoods to third parties – its more than 1 million per day readership.

134. DAILY BEAST knew or should have known such false statement would likely result in material and substantial injury to Plaintiff, as the statement accuses the Plaintiff of stealing a laptop from the son of the newly elected President of the United States.

135. The DAILY BEAST's false statements have subjected and continue to subject the Plaintiff to distrust, scorn, ridicule, hatred, and contempt. As such, the defamatory statements constitute defamation *per se*.

136. DAILY BEAST's false statement does not only accuse the Plaintiff of theft but also implies that Plaintiff has committed an infamous crime, i.e., crime against the United States of America by attempting to undermine American democracy and the 2020 Presidential election through the alleged theft of the laptop.

137. As a direct and proximate result of the defamatory statements made by DAILY BEAST, Plaintiff has suffered, and continues to suffer, substantial damages, including having to close his business.

138. Upon information and belief, as evidenced in the prejudicial October 14, 2020 article, DAILY BEAST intended to harm the Plaintiff with the false statements.

139. DAILY BEAST had actual knowledge of the falsity of the claims and understood the high probability that injury or damage would result to Plaintiff and, despite such knowledge, broadcast the false and defamatory statement and has issued no apology to the Plaintiff such as would repair that damage.

140. In the alternative, DAILY BEAST's actions, as described above, were so reckless or wanting in care that they constituted a conscious disregard or indifference to the rights of Plaintiff.

**Prayer for Relief**

WHEREFORE, the Plaintiff JOHN PAUL MAC ISAAC prays for judgment against the Defendant THE DAILY BEAST COMPANY, LLC as follows:

- (a) Awarding Plaintiff all compensatory damages in excess of \$75,000 as a result of DAILY BEAST's wrongdoing in an amount to be determined at trial;
- (b) Awarding Plaintiff punitive damages as a result of DAILY BEAST's wrongdoing in an amount to be determined at trial;
- (c) Awarding Plaintiff pre- and post-judgment interest;
- (d) Awarding Plaintiff all attorneys' fees and costs associated with litigating this case;
- (e) Requiring all Defendants to make a public retraction of all false statements and to issue a public apology to Plaintiff; and
- (f) Such further relief as this Court deems just and proper.

**F. COUNT 4: DEFAMATION AND DEFAMATION PER SE  
POLITICO**

141. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 44.

142. On October 19, 2020, POLITICO published an article entitled:<sup>10</sup>

**NATIONAL SECURITY**

**Hunter Biden story is Russian disinfo, dozens of former intel officials say**

More than 50 former intelligence officials signed a letter casting doubt on the provenance of a New York Post story on the former vice president's son.

143. According to POLITICO in that article:

The letter, signed on Monday, centers around a batch of documents released by the New York Post last week that purport to tie the Democratic nominee to his son Hunter's business dealings. Under the banner headline "Biden Secret E-mails," the Post reported it was given a copy of Hunter Biden's laptop hard drive by President Donald Trump's personal lawyer Rudy Giuliani, who said he got it from a Mac shop owner in Delaware who also alerted the FBI.

144. POLITICO is referencing the letter signed by more than 50 former senior intelligence officials stating their belief that the information from the laptop "has all the classic earmarks of a Russian information operation."

145. The 50 former senior intelligence officials *did not* state that the Hunter Biden story *IS* Russian disinformation – that was POLITICO.

146. POLITICO knowingly falsely stated as fact that the Hunter Biden story *IS* Russian disinformation.

147. The article was written by journalist Natasha Bertrand, who seemingly has a history of transforming speculation into fact in the stories upon which she reports.<sup>11</sup>

148. POLITICO published the article with a false headline stated as fact and is about the Plaintiff.

---

<sup>10</sup> <https://www.politico.com/news/2020/10/19/hunter-biden-story-russian-disinfo-430276>

<sup>11</sup> <https://www.washingtonpost.com/opinions/2020/02/28/how-politicos-natasha-bertrand-bootstrapped-dossier-credulity-into-tv-gig/>



149. POLITICO published the false factual statement about the Plaintiff without privilege to do so.

150. The false and defamatory publication about the Plaintiff by POLITICO include, but are not limited to, allegations that the information published by the NY POST, which originally came from the Plaintiff, was part of a Russian disinformation campaign, thereby directly implying that the Plaintiff part of a Russian disinformation campaign and/or, more specifically, a Russian agent.

151. The defamatory publication was made negligently; without reasonable care as to its truth or falsity, with knowledge of its falsity, and/or with reckless disregard for the truth.

152. The defamatory publication was published and viewed by POLITICO's readers.

153. POLITICO's publication alleges that Plaintiff committed crimes including (but not limited to) working with Russians to spread "disinformation" relating to the son of Democratic Party nominee, now President, Joseph Biden, thereby implying that Plaintiff committed treason by being part of an attempt to undermine American democracy and the 2020 Presidential election.

154. POLITICO's publication is of the kind that would tend to, and in fact did, prejudice the Plaintiff in the eyes of a substantial and respectable portion of the community at large.

155. POLITICO knowingly published the falsehoods as facts to third parties.

156. POLITICO knew or should have known such false statements in the publication would likely result in material and substantial injury to Plaintiff, as the statements call into question Plaintiff's loyalty to the United States. Additionally, the published statements have subjected and continue to subject the Plaintiff to distrust, scorn, ridicule, hatred, and contempt.

157. POLITICO's publication of false statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by attempting to undermine American democracy and the 2020 Presidential election.

158. As a direct and proximate result of the defamatory statements published by POLITICO, Plaintiff has suffered, and continues to suffer, substantial damages, including the loss of his business.

159. Upon information and belief, and based on the prejudicial October 14<sup>th</sup> article, POLITICO intended to harm the Plaintiff (among others) through the publication of the false statements.

160. POLITICO had actual knowledge of the falsity of the claims and understood the high probability that injury or damage would result to Plaintiff and, despite such knowledge, broadcast the false and defamatory statement and has issued no apology to the Plaintiff such as would repair that damage.

161. In the alternative, POLITICO's actions, as described above, were so reckless or wanting in care that they constituted a conscious disregard or indifference to the rights of Plaintiff.

**Prayer for Relief**

WHEREFORE, the Plaintiff JOHN PAUL MAC ISAAC prays for judgment against the Defendant POLITICO as follows:

(a) Awarding Plaintiff all compensatory damages in excess of \$75,000 as a result of POLITICO's wrongdoing in an amount to be determined at trial;

(b) Awarding Plaintiff punitive damages as a result of POLITICO's wrongdoing in an amount to be determined at trial;

- (c) Awarding Plaintiff pre- and post-judgment interest;
- (d) Awarding Plaintiff all attorneys' fees and costs associated with litigating this case;
- (e) Requiring all Defendants to make a public retraction of all false statements and to issue a public apology to Plaintiff; and
- (f) Such further relief as this Court deems just and proper.

**G. COUNT 6: CIVIL CONSPIRACY TO COMMIT DEFAMATION**  
**ALL DEFENDANTS**

- 162. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 -- 161.
- 163. The Defendants all expressed support for then-Presidential candidate, Joseph R. Biden in the 2020 U.S. Presidential election.
- 164. The Defendants all expressed vehement opposition to President Donald J. Trump in the 2020 U.S. Presidential election.
- 165. The information contained in the NY POST expose would have hurt the candidacy of Joseph R. Biden and, potentially, prevent his election.
- 166. The Defendants all knew that the information contained in the NY POST expose would hurt the candidacy of Joseph R. Biden and, potentially, prevent his election.
- 167. Voters who voted for Joseph R. Biden have indicated that, if they had known more about the Hunter Biden laptop, they likely would not have voted for Joseph R. Biden.
- 168. The Defendants would do everything within their power to prevent the re-election of President Donald J. Trump, including defaming Plaintiff and others.
- 169. SCHIFF is a powerful member of Congress.
- 170. Defendants, CNN, DAILY BEAST, and POLITICO are powerful media outlets who have loyal readers/viewers all over the world.

171. The Defendants all openly participated in the efforts to kill the Hunter Biden laptop story including painting those involved (including the Plaintiff) as willing participants in a Russian disinformation scheme.

172. The Defendants all openly participated in the efforts to falsely communicate to the general public that the Hunter Biden laptop story is Russian disinformation and that those involved (including the Plaintiff) are working with the Russians to influence the U.S. Presidential elections.

173. In doing so, the Defendants have unlawfully defamed the Plaintiff on numerous occasions.

174. As a result, Plaintiff has suffered significant damages including the loss of income from having to close his business.

**Prayer for Relief**

WHEREFORE, the Plaintiff JOHN PAUL MAC ISAAC prays for judgment against the Defendants as follows:

(g) Awarding Plaintiff all compensatory damages including consequential and incidental damages as a result of Defendants' wrongdoing in an amount to be determined at Trial;

(h) Awarding Plaintiff punitive damages as a result of Defendants' wrongdoing in an amount to be determined at Trial;

(i) Awarding Plaintiff pre- and post-judgment interest;

(j) Awarding Plaintiff all attorneys' fees and costs associated with litigating this case;

(k) Requiring all Defendants to make a public retraction of all false statements and to issue a public apology to Plaintiff; and

(l) Such further relief as this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff requests a trial by jury on all issues raised herein.

Date: May 3, 2022

Respectfully submitted,



---

**Brian R. Della Rocca, Esquire**

Bar ID: 21781

Compass Law Partners

51 Monroe Street, Suite 408

Rockville, Maryland 20850

Ph: (240) 560-3030

Fax: (301) 740-2297

[bdellarocca@compass-law.com](mailto:bdellarocca@compass-law.com)

*Attorneys for Plaintiff*