

CAUSE NO. D-1-GN-18-001835

NEIL HESLIN, <i>Plaintiff</i>	§	IN DISTRICT COURT OF
	§	
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
ALEX E. JONES, INFOWARS, LLC, FREE SPEECH SYSTEMS, LLC, and OWEN SHROYER, <i>Defendants</i>	§	<u>261ST</u> DISTRICT COURT
	§	
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**PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE**

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Plaintiff NEIL HESLIN files this original petition against Defendants, ALEX JONES, INFOWARS, LLC, FREE SPEECH SYSTEMS, LLC, and OWEN SHROYER, and alleges as follows:

**DISCOVERY CONTROL PLAN**

1. Plaintiff intends to seek a customized discovery control plan under Level 3 of Texas Rule of Civil Procedure 190.4.

**PARTIES**

2. Plaintiff Neil Heslin in an individual residing in the State of Connecticut.
3. Defendant Alex E. Jones is a resident of Austin, Texas. He is the host of radio and web-based news programing, including "The Alex Jones Show," and he owns and operates the website InfoWars.com. Mr. Jones can be served at his place of business, InfoWars, 3019 Alvin Devane Blvd., Suite 300-350, Austin, TX 78741.

4. Defendant InfoWars, LLC is a Texas limited liability company with principal offices located in Austin, Texas. It may be served at the address of its attorney, Eric Taube, at 100 Congress Avenue, 18<sup>th</sup> Floor, Austin, TX 78701.

5. Defendant Free Speech Systems, LLC is a Texas limited liability company with principal offices located in Austin, Texas. It may be served at the address of its registered agent, Eric Taube, at 100 Congress Avenue, 18<sup>th</sup> Floor, Austin, TX 78701.

6. Defendant Owen Shroyer is an individual residing in Travis County. At all times relevant to this suit, Mr. Daniels has been a reporter for InfoWars. Mr. Shroyer can be served at the address of his employer, InfoWars, 3019 Alvin Devane Blvd., Suite 300-350, Austin, TX 78741.

#### **JURISDICTION & VENUE**

7. The damages sought in this case exceed the minimum jurisdictional limits of Travis County District Courts.

8. Venue is proper in Travis County, Texas, because a suit for damages for defamation may be brought in the county in which a defendant resided at the time of filing, or the domicile of any corporate defendant, at the election of the plaintiff. *See Tex. Civ. Prac. & Rem. Code §15.017.*

#### **FACTUAL BACKGROUND**

9. Plaintiff Neil Heslin is the father of deceased minor J.L., a victim of the December 14, 2012 Sandy Hook Elementary School Shooting.

10. This case arises out of accusations by InfoWars in the summer of 2017 that Plaintiff was lying about whether he actually held his son's body and observed a bullet hole in his head. This heartless and vile act of defamation re-ignited the Sandy Hook "false flag" conspiracy and tore open the emotional wounds that Plaintiff has tried so desperately to heal.

11. This conspiracy theory, which has been pushed by InfoWars and Mr. Jones since the day of the shooting, alleges that the Sandy Hook massacre did not happen, or that it was staged by the government and concealed using actors, and that the parents of the victims are participants in a horrifying cover-up.

12. During the June 18, 2017 profile of Jones for her NBC show *Sunday Night with Megyn Kelly*, Ms. Kelly interviewed Plaintiff about the claims made by Jones in the past, including that "the whole thing was fake" and "a giant hoax."<sup>1</sup> Addressing this hateful lie, Plaintiff told Kelly, "I lost my son. I buried my son. I held my son with a bullet hole through his head."<sup>2</sup>

13. On June 26, 2017, InfoWars' broadcast featured a segment hosted by reporter Owen Shroyer in which Shroyer claimed to have reviewed evidence showing it was impossible for Plaintiff to have held his son and see his injury.

14. During the broadcast, Shroyer said, "The statement [Plaintiff] made, fact-checkers on this have said cannot be accurate. He's claiming that he held his son

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<sup>1</sup> [https://www.realclearpolitics.com/video/2017/06/18/full\\_video\\_megyn\\_kelly\\_interviews\\_alex\\_jones.html](https://www.realclearpolitics.com/video/2017/06/18/full_video_megyn_kelly_interviews_alex_jones.html)

<sup>2</sup> *Id.*

and saw the bullet hole in his head. That is his claim. Now, according to a timeline of events and a coroner's testimony, that is not possible."<sup>3</sup>

15. As support for these defamatory statements, Shroyer played video footage where the local medical examiner informed reporters that the slain students were initially identified using photographs rather than in person.

16. Shroyer also stated, "You would remember if you held your dead kid in your hands with a bullet hole. That's not something you would just misspeak on."<sup>4</sup>

17. Shroyer continued by stating that Plaintiff was "making a pretty extreme claim that would be a very thing vivid in your memory, holding his dead child."<sup>5</sup>

18. "The conspiracy theorists on the internet out there have a lot of questions are that are yet to be answered. You say whatever you want about the event, that's just a fact."<sup>6</sup>

19. At the conclusion of his report, Shroyer stated, "Will there be a clarification from Heslin or Megyn Kelly? I wouldn't hold your breath. [Laugh]. So now they're fueling the conspiracy theory claims. Unbelievable."<sup>7</sup>

20. The underlying point or gist of Shroyer's report is that Plaintiff's version "is not possible" and "cannot be accurate," and that Plaintiff was lying about the circumstances of his son's tragic death for a nefarious and criminal purpose.

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<sup>3</sup> <https://www.infowars.com/zero-hedge-discovers-anomaly-in-alex-jones-hit-piece/>

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

21. Shroyer's report was manifestly false. In addition, a minimal amount of research would have caused any competent journalist not to publish the defamatory accusation. According to contemporary news accounts, the bodies of the victims were released from the medical examiner into the custody of the families.<sup>8</sup> Funerals where the children's bodies were in the custody of their parents were widely reported on by the press.<sup>9</sup>

22. On July 20, InfoWars programming featured a segment hosted by Alex Jones in which Shroyer's report was re-broadcast in full. When introducing the segment, Jones demanded that Plaintiff "clarify" what actually happened.

23. After showing the segment, Jones said he told Shroyer, "I could never find out. The stuff I found was they never let them see their bodies. That's kind of what's weird about this. But maybe they did. So I'm sure it's all real. But for some reason they don't want you to see [Shroyer's segment]."<sup>10</sup>

24. Regarding the Sandy Hook shooting, Jones said, "Can I prove that New Haven [sic] didn't happen? No. So I've said, for years, we've had debates about it, that I don't know. But you can't blame people for asking."<sup>11</sup>

25. Mr. Jones was lying. In the five years following the tragedy, he has repeatedly and unequivocally called the Sandy Hook shooting a hoax.

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<sup>8</sup> <https://patch.com/connecticut/newtown/police-no-motive-emerging-in-newtown-school-shooting>

<sup>9</sup> <http://abcnews.go.com/US/photos/sandy-hook-moment-silence-18026580/image-18045101>;  
[https://www.washingtonpost.com/politics/funerals-for-newtown-massacre-victims-begin/2012/12/17/ffd0a130-486d-11e2-820e-17eefac2f939\\_story.html?utm\\_term=.0ccb4af100](https://www.washingtonpost.com/politics/funerals-for-newtown-massacre-victims-begin/2012/12/17/ffd0a130-486d-11e2-820e-17eefac2f939_story.html?utm_term=.0ccb4af100)

<sup>10</sup> <https://www.mediamatters.org/blog/2017/07/21/alex-jones-sandy-hook-dad-needs-clarify-whether-he-actually-held-his-son-s-body-and-saw-bullet-hole/217333>

<sup>11</sup> *Id.*

## **BACKGROUND TO INFOWARS' 2017 DEFAMATORY STATEMENTS**

26. In order to appreciate the full defamatory impact and the extent of the mental anguish caused by InfoWars' 2017 statements, it is necessary to understand InfoWars' long history of harassing the Sandy Hook parents with defamatory lies. InfoWars' 2017 statements are but the latest in a series of false, hurtful, and dangerous assertions about Plaintiff and the parents of the other victims.

27. In 2013, Jones called the shooting "staged" and said, "It's got inside job written all over it."<sup>12</sup>

28. In March 2014, Jones said, "Folks, we've got video of Anderson Cooper with clear blue-screen out there. [Shaking head]. He's not there in the town square. We got people clearly coming up and laughing and then doing the fake crying. We've clearly got people where it's actors playing different parts for different people, the building bulldozed, covering up everything. Adam Lanza trying to get guns five times we're told. The witnesses not saying it was him...I've looked at it and undoubtedly, there's a cover-up, there's actors, they're manipulating, they've been caught lying, and they were pre-planning before it and rolled out with it."<sup>13</sup>

29. In May 2014, InfoWars published an article titled: "CONNECTICUT TRIES TO HIDE SANDY HOOK TRUTH."<sup>14</sup>

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<sup>12</sup> <https://www.mediamatters.org/blog/2013/04/15/alex-jones-on-boston-blasts-us-govt-is-prime-su/193635>; <https://www.mediamatters.org/embed/clips/2016/11/29/51289/gcn-alexjones-20130409-sandyhook>

<sup>13</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51283/gcn-alexjones-20140314-shooting>

<sup>14</sup> <https://www.infowars.com/connecticut-tries-to-hide-sandy-hook-truth/>

30. In September 2014, InfoWars published an article titled: "FBI SAYS NO ONE KILLED AT SANDY HOOK."<sup>15</sup>

31. In December 2014, Jones said on his radio program, "The whole thing is a giant hoax. How do you deal with a total hoax? It took me about a year, with Sandy Hook, to come to grips with the fact that the whole thing was fake. I did deep research."<sup>16</sup>

32. In the same December 2014 broadcast, Jones continued: "The general public doesn't know the school was actually closed the year before. They don't know they've sealed it all, demolished the building. They don't know that they had the kids going in circles in and out of the building as a photo-op. Blue screen, green screens, they got caught using."<sup>17</sup>

33. Jones made similar comments in January 2015, stating on InfoWars: "You learn the school had been closed and re-opened. And you've got video of the kids going in circles, in and out of the building, and they don't call the rescue choppers for two hours, and then they tear the building down, and seal it. And they get caught using blue-screens, and an email by Bloomberg comes out in a lawsuit, where he's telling his people get ready in the next 24 hours to capitalize on a shooting. Yeah, so Sandy Hook is a synthetic, completely fake with actors, in my view, manufactured. I couldn't believe it at first. I knew they had actors there, clearly, but I thought they killed some real kids. And it just shows how bold they are

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<sup>15</sup> <https://www.infowars.com/fbi-says-no-one-killed-at-sandy-hook/>

<sup>16</sup> [https://www.realclearpolitics.com/video/2017/06/18/full\\_video\\_megyn\\_kelly\\_interviews\\_alex\\_jones.html](https://www.realclearpolitics.com/video/2017/06/18/full_video_megyn_kelly_interviews_alex_jones.html)

<sup>17</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51292/gcn-alexjones-20141228-sandyhook>



that they clearly used actors. I mean they even ended up using photos of kids killed in mass shootings here in a fake mass shooting in Turkey, or Pakistan. The sky is now the limit.”<sup>18</sup>

34. Mr. Jones’ statement about Pakistan refers to a conspiracy theory Jones helped spread involving deceased minor child N.P., a Sandy Hook victim whose photograph appeared at vigil for children slain a school attack in Peshawar. On the day of the Peshawar incident, a Pakistani woman created a collage of photographs of young people killed in school attacks and posted it to Facebook with the caption “They Went to School and Never Came Back.”<sup>19</sup> Because the Peshawar shooting occurred very close to the anniversary of the Sandy Hook massacre, she included a picture of a child from the latter event, along with pictures of Peshawar victims.<sup>20</sup> That collage was then printed out and cut up into the individual photographs displayed by mourners at a vigil for the Peshawar victims.<sup>21</sup>

35. In the same month, January of 2015, InfoWars published an article titled: “MYSTERY: SANDY HOOK VICTIM DIES (AGAIN) IN PAKISTAN.”<sup>22</sup> The article states: “A large-scale attack on a school in Peshawar, Pakistan, last month left 132 school children and 10 teachers dead. Among the alleged victims emerged the familiar face of [deceased minor N.P.], one of the children supposedly killed in the December 2012 Sandy Hook school shooting in Newtown, Connecticut.” InfoWars’

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<sup>18</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51290/gcn-alexjones-20150113-shooting>

<sup>19</sup> <https://www.snopes.com/fact-check/info-boors/>

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> <https://www.infowars.com/mystery-sandy-hook-victim-dies-again-in-pakistan/>



story was meant to reinforce Mr. Jones' persistent lie that N.P. and the other victims of the shooting, such as Plaintiff's son J.L., are not real.

36. In July 2015, Mr. Jones stated on InfoWars: "But you've got green-screen with Anderson Cooper, where I was watching the video, and the flower and plants were blowing in some of them, and then they blow again the same way. It's looped. And then his nose disappears. I mean, it's fake. The whole thing is...I don't know what happened. It's kind of like if you see a hologram at Disney World in the Haunted House. You know? I don't know how they do it, but it's not real. When you take your kids to see the Haunted House and ghosts are flying around, it's not real, folks. It's staged. I mean, a magician grabs a rabbit out of his hat. I know he's got a box under the table that he reaches in and gets the rabbit. I don't know what the trick is here. I've got a good suspicion. But when you've got Wolfgang Halbig...He believed it was real. People called him. He went and investigated. No paperwork, no nothing. It's bull. And now an FBI retired agent, who retired, you know, with decorations. I mean, [InfoWars reporter Rob] Dew, this unprecedented."<sup>23</sup>

37. In the same month, InfoWars published an article titled: "MEGA MASSIVE COVER UP: RETIRED FBI AGENT INVESTIGATES SANDY HOOK."<sup>24</sup>

38. In January of 2016, Florida resident Lucy Richards left threatening voicemail messages and sent violent emails to Leonard Pozner, a fellow Sandy Hook parent and personal friend of Plaintiff Neil Heslin. The threats included messages

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<sup>23</sup> <https://www.mediamatters.org/embed/clips/2016/11/29/51284/gcn-alexjones-20150707-shooting>

<sup>24</sup> <https://www.infowars.com/mega-massive-cover-up-retired-fbi-agent-investigates-sandy-hook/>

stating: "you gonna die, death is coming to you real soon" and "LOOK BEHIND YOU IT IS DEATH."<sup>25</sup> When Richards was later sentenced, Senior U.S. District Judge James Cohn stated: "I'm sure [Leonard Pozner] wishes this was false, and he could embrace [N.P.], hear [N.P.'s] heartbeat and hear [N.P.] say 'I love you, Dad'...Your words were cruel and insensitive. This is reality and there is no fiction. There are no alternative facts."<sup>26</sup> As part of her sentence, Ms. Richards will not be permitted to access a list of conspiracy-based websites upon her release, including InfoWars.<sup>27</sup> Ms. Richard's arrest and sentencing are an ominous reminder to the Plaintiff of the danger posed by InfoWars' continuing lies about Sandy Hook.

39. In November 2016, Mr. Jones appeared on InfoWars and ranted about false Sandy Hook claims for twenty minutes.<sup>28</sup>

40. During the November 2016 video broadcast, Mr. Jones stated: "That shows some kind of cover-up happening. And then I saw Anderson Cooper -- I've been in TV for twenty-something years, I know a blue-screen or a green-screen -- turn and his nose disappeared. Then I saw clearly that they were using footage on the green-screen looped, because it would show flowers and other things during other broadcasts that were moving, and then basically cutting to the same piece of

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<sup>25</sup> <https://www.nbcnews.com/news/us-news/conspiracy-theorist-arrested-death-threats-against-sandy-hook-parent-n693396>

<sup>26</sup> <http://www.nydailynews.com/news/crime/judge-hands-sandy-hook-truther-prison-sentence-article-1.3229754>

<sup>27</sup> <https://www.buzzfeed.com/claudiakoerner/a-conspiracy-theorist-will-serve-time-for-threatening-a>

<sup>28</sup> <https://www.youtube.com/watch?v=MwudDfz1yAk>

footage...Then we see footage of one of the reported fathers of the victims, Robbie Parker, doing classic acting training."<sup>29</sup>

41. The gist of these statements was that the Sandy Hook parents, including Plaintiff Neil Heslin, are participating in a sinister manipulation plan to fool the public.

42. During the November 2016 broadcast, Jones played video footage of Anderson Cooper interviewing Sandy Hook parent Veronique De La Rosa, at which point Jones stated: "We point out clear chromakey, also known as blue-screen or greenscreen being used, and we're demonized. We point out that they're clearly doing fake interviews."<sup>30</sup> This false statement was likewise used to support Mr. Jones' vicious lie.

43. Towards the end of the November 2016 broadcast, Mr. Jones stated: "Why should anybody fear an investigation? If they have nothing to hide? In fact, isn't that in Shakespeare's Hamlet? Methinks you protest too much...This particular case, they are so scared of investigation. Everything they do ends up blowing up in their face, so guys are going to get what you want now. I'm going to start re-investigating Sandy Hook and everything else that happened with it."<sup>31</sup>

44. Mr. Jones concluded the video by stating: "So, if children were lost at Sandy Hook, my heart goes out to each and every one of those parents. And the people who say they're parents that I see on the news. The only problem is, I've

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<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

watched a lot of soap operas. And I've seen actors before. And I know when I'm watching a movie and when I'm watching something real."<sup>32</sup>

45. The November 2016 video broadcast was entitled, "Alex Jones Final Statement on Sandy Hook." It was Plaintiff's hope that the title was accurate, and that Mr. Jones would finally end his reckless attacks on the Sandy Hook parents and his assertions that they were liars and actors engaged in a fraud on the American people.

46. As horrifying as the November 2016 broadcast was, its promise of being the "Final Statement" gave hope to Plaintiff that his harassment and defamation by Mr. Jones might be coming to an end after four long years.

47. Those hopes were soon dashed. Instead, InfoWars made continuing defamatory comments in 2017 as outlined above.

48. Mr. Jones also made additional comments in April of 2017 which repeated the claims which form the rickety structure of Mr. Jones' colossal lie about Sandy Hook, including the allegation that fellow Sandy Hook parent Veronique De La Rosa conducted a fake interview with Anderson Cooper to hide the truth, while telling his viewers not to "believe any of it."<sup>33</sup>

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<sup>32</sup> *Id.*

<sup>33</sup> <https://www.youtube.com/watch?v=rUn1jKhWTXI>

49. On June 18, 2017, Mr. Jones made additional comments when interviewed by Megyn Kelly, during which he stated: "I do think there's some cover-up and some manipulation."<sup>34</sup> The following exchange took place:

MEGYN KELLY: But Alex, the parents, one after the other, devastated. The dead bodies that the coroner autopsied ...

ALEX JONES: And they blocked all that. And they won't release any of it. That's unprecedented.<sup>35</sup>

50. Jones and Kelly also had the following exchange:

JONES: But then what do you do, when they've got the kids going in circles, in and out of the building with their hands up? I've watched the footage. And it looks like a drill.

MEGYN KELLY: When you say, "parents faked their children's death," people get very angry.

ALEX JONES: Yeah, well, that's - oh, I know. But they don't get angry about the half million dead Iraqis from the sanctions. Or they don't get angry about all the illegals pouring in.<sup>36</sup>

51. Shortly following the Megyn Kelly interview, on June 26, 2017, InfoWars reporter Owen Shroyer made the defamatory statements referenced above.

52. As such, the broadcasts made by InfoWars on June 26, 2017 and July 20, 2017 defaming Mr. Heslin did not occur in isolation. Rather, the statements were a continuation and elaboration of a years-long campaign to falsely attack the

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<sup>34</sup> [https://www.realclearpolitics.com/video/2017/06/18/full\\_video\\_megyn\\_kelly\\_interviews\\_alex\\_jones.html](https://www.realclearpolitics.com/video/2017/06/18/full_video_megyn_kelly_interviews_alex_jones.html)

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

honesty of the Sandy Hook parents, casting them as participants in a ghastly conspiracy and cover-up.

53. By making renewed accusations about Plaintiff in 2017, InfoWars breathed new life into this conspiracy and caused intense emotional anguish and despair. For that reason, Plaintiff brings this suit against Defendants.

### **CAUSE OF ACTION**

#### **I. Defamation and Defamation *Per Se***

54. All previous allegations are incorporated by reference.

55. Plaintiff is a private individual and is neither a public official nor a public figure.

56. The June 26, 2017 and July 20, 2017 broadcasts by Defendants were false, both in their particular facts and in the main point, essence, or gist in the context in which they were made.

57. The June 26, 2017 and July 20, 2017 broadcasts by Defendants, while defamatory in their own right, were also continuations and elaborations of an underlying defamatory assertion which Defendants have advanced since 2013, namely that Plaintiff has lied to the American people about the death of his son and has participated in a horrifying criminal cover-up.

58. In viewing the June 26, 2017 and July 20, 2017 broadcasts, a reasonable member of the public would be justified in inferring that the publications implicated the Plaintiff.

59. The June 26, 2017 and July 20, 2017 broadcasts were also defamatory because they are reasonably susceptible to a defamatory meaning by innuendo. A reasonable person, reviewing the statements in question, could conclude the Plaintiff was being accused of engaging in fraudulent or illegal activity. In context, the gist of the statements could be construed as defamatory to the Plaintiff by an average member of general public.

60. Defendants' defamatory publications were designed to harm Plaintiff's reputation and subject the Plaintiff to public contempt, disgrace, ridicule, or attack.

61. Defendants acted with actual malice. Defendants' defamatory statements were knowingly false or made with reckless disregard for the truth or falsity of the statements at the time the statements were made.

62. Defendants' defamatory statements were not privileged.

63. Defendants' defamatory statements constitute defamation *per se*. The harmful nature of the defamatory statements is self-evident. The defamatory statements implicate the Plaintiff in heinous criminal conduct. False implications of criminal conduct are the classic example of defamation *per se*.

64. Defendants publicly disseminated the defamatory publications to an enormous audience causing significant damages to the Plaintiff.

65. Defendants' defamatory publications have injured Plaintiff's reputation and image, and they have exposed Plaintiff to public and private hatred, contempt, and ridicule.



66. In light of their prior experience with these kind of reckless statements, Defendants knew that their publication could cause Plaintiff to suffer harassment and potential violence.

67. Defendants' defamatory publications have and will continue to cause harm to Plaintiff. Due to Defendants' conduct, the Plaintiff has suffered and continues to suffer substantial damages in an amount to be proven at trial.

### **III. Conspiracy**

68. All previous allegations are incorporated by reference.

69. Defendants acted together, as a cabal, to accomplish their campaign of defamation. Defendants had a meeting of the minds on the object or course of action underlying their pattern of recklessly defamatory publications.

70. As a result of this meeting of the minds, Defendants collectively committed the unlawful overt acts detailed above.

71. Defendants are jointly and severally liable for the injuries Mr. Heslin suffered due to Defendants' wrongful actions.

### **IV. Respondeat Superior**

72. All previous allegations are incorporated by reference.

73. When InfoWars employees acted in the manner described in this Petition, they did so as agents of InfoWars and within the scope of their authority from Mr. Jones.

74. InfoWars and Alex Jones are liable for the damages proximately caused by the conduct of employees and agents, including Owen Shroyer, pursuant to the doctrine of *respondeat superior*.

#### **DAMAGES**

75. Plaintiff has suffered general and special damages, including a severe degree of mental stress and anguish which has disrupted his daily routine and caused a high degree of psychological pain.

76. Plaintiff has also suffered damage to his reputation and image, both up to the present and into the future.

77. Because Defendants' conduct amounts to defamation *per se*, Plaintiff is also entitled to an award of presumed damages.

78. Plaintiff is also entitled to an award of nominal damages and a judgment clearing his name.

79. Plaintiff is also entitled to exemplary damages because the Defendants acted with malice.

80. Plaintiff is also entitled to pre-judgment and post-judgment interest, costs of court, and attorney's fees.

81. Pursuant to Rule 47 of the Texas Rules of Civil Procedure, Plaintiff is seeking relief in excess of \$1,000,000.

**JURY DEMAND**

82. Plaintiff demands a jury trial and tenders the appropriate fee with this petition.

**REQUEST FOR DISCLOSURE**

83. Plaintiff requests that Defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

**PRAYER**

WHEREFORE PREMISES CONSIDERED, Plaintiff Neil Heslin asks that the Court issue citation for each Defendant to appear and answer, and that Plaintiff be awarded all the damages set forth above, and to grant whatever further relief to which Plaintiff is justly entitled.

Respectfully submitted,

**KASTER LYNCH FARRAR & BALL, LLP**



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