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ANTONIO MOORE & YVETTE CARNELL

FILED
IN THE OFFICE OF THE
CLERK OF COURTS
FOR THE COUNTY OF MIDDLESEX

JUL 21 2022

Joseph H. Simons
CLERK

**MIDDLESEX SUPERIOR COURT
COMMONWEALTH OF MASSACHUSETTS**

17 ANTONIO MOORE, YVETTE CARNELL,

Case No. 22-2836

18 Plaintiffs,
19 vs.

COMPLAINT FOR DAMAGES

20 HARVARD UNIVERSITY, a corporation,
21 HARVARD KENNEDY SCHOOL an
individual, and DOES 1- 100.

22 Defendants.

- 1) DEFAMATION
- 2) NEGLIGENT PUBLICATION
- 3) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
- 4) NEGLIGENCE
- 5) VICARIOUS LIABILITY FOR AGENTS

DEMAND FOR JURY TRIAL

26 ///

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DEMAND FOR JURY TRIAL

26 ///

1 **COMPLAINT AND DEMAND FOR JURY TRIAL**

2 COME NOW, This is a civil action for damages sustained by the Plaintiffs,
3 Antonio Moore & Yvette Carnell:

4 **INTRODUCTION**

5 1. This tort action seeks compensatory damages from Defendants for
6 violating various state laws in connection with the publishing, endorsing, and mass
7 distribution of the Harvard Shorenstein Center of the Harvard Kennedy School
8 product: "*Disinformation creep: ADOS and the Strategic weaponization of breaking*
9 *news,*" which occurred on January 18, 2021.

10 2. The above referenced product contains allegations of Plaintiffs
11 engaging in widespread voter disinformation and suggestions of voter suppression;
12 Ignoring Covid-19 and any potential impact on African-Americans; Using their
13 platforms to disenfranchise Black Americans from voting for Democratic candidates
14 at upcoming local and national elections; and implications of ties to Russian
15 Disinformation.

16 3. Not only was contrary information widely available to prove those
17 allegations as false, but requests for retractions were ignored for over a year while
18 the authors used Harvard University and its established networks, credibility, and
19 influence to Defame the Plaintiffs causing general and special damages.

20 4. Harvard University as well as each individual Defendant and DOES 1-
21 100 failed its duty of reasonable care to ensure the truth and credibility of its
22 Publication to third parties these allegations against the Plaintiffs without concerns
23 for its accuracy or truth.

24 5. At all relevant times, Plaintiff, Antonio Moore ("Plaintiff/Moore") was
25 an individual residing in the County of Los Angeles, California.

1 14. The Plaintiff, Yvette Carnell, (“Plaintiff, Carnell”) as an individual
 2 residing in Atlanta, Georgia.

3 15. The Defendant, HARVARD UNIVERSITY, (“Defendant, Harvard”) is
 4 on information and belief a Massachusetts corporation with its principal place of
 5 business at 124 Mount Auburn Street, 2nd Floor, South Elevators, Cambridge, MA
 6 at Middlesex County, Massachusetts.

7 16. The Defendant, HARVARD KENNEDY SCHOOL, (“Defendant,
 8 Kennedy”) is on information and belief a Massachusetts corporation with its
 9 principal place of business at 79 John F. Kennedy St, in Cambridge, MA in
 10 Middlesex County, Massachusetts.

11 17. The Defendant, SHORENSTEIN CENTER, (“Defendant,
 12 Shorenstein”) is on information and belief a Massachusetts corporation with its
 13 principal place of business at 124 Mount Auburn Street, 2nd Floor, South Elevators
 14 in Cambridge, MA in Middlesex County, Massachusetts.

15 18. The Defendant, MOVEON, (“Defendant, MoveOn”) is on information
 16 and belief a California corporation with its principal place of business at
 17 1442 Walnut St 358 at Alameda County, California.

18 19. The Defendant, Mutale Nkonde (“Defendant, Nkonde”) as an
 19 individual residing in Brooklyn, New York. Listed Author of the Harvard
 20 Publication.

21 20. The Defendant, Maria Rodriguez (“Defendant, Rodriguez”) as an
 22 individual residing in Amherst, New York. Listed Author of the Harvard
 23 Publication.

24 21. The Defendant, Leonard Cortana (“Defendant, Cortana”) as an
 25 individual residing in New York, New York. Listed Author of the Harvard
 26 Publication.

27

COMPLAINT FOR DAMAGES

32. Living in America through the lens of a young Black Attorney in search of the American Dream and the promise of a full United States citizen experience, Moore regularly posts to social media since on or about 2013 (year) and continues through the date of filing.

33. Moore's content (253 videos) has amassed over 12.4 million total views on YouTube.

34. Carnell has a weekly show every Monday and Wednesday on YouTube called Breaking Brown. Carnell has amassed 17.8 million views on a total of 572 YouTube videos. Carnell worked as a Congressional aide to Democrats Senator Barbara Boxer and Congressman Robert Marion Berry. Carnell is a lifelong democratic voter.

35. Moore has written for the Huffington Post, VICE Sports, Fortune Magazine, ESPN Undeafated, and more, on issues of race and politics.

36. Notable Projects featuring the Plaintiff include, the 2019 ADOS conference with Historically Black College/University Simmons College of Kentucky, the Angela Project with St. Stephens church of Louisville, and creating the current energy for the national reparations movement. As ADOS co-founders



Plaintiffs have traveled the country, engaging citizens in discussions around race and wealth. Plaintiffs have led multiple city wide book readings in Louisville Kentucky. Titles include "Color of Law," "Color of Money" among other book titles.

1 Plaintiff also partnered with Democratic congressman John Yarmuth, a cosponsor
 2 of the CARES act to discuss and address Black agenda items.

3 37. ADOS or American Descendants of Slavery is a term created by
 4 Yvette Carnell and Antonio Moore in or around late 2017. ADOS has been heavily
 5 in social media 2018 to present around the hash-tag #ADOS.

6 38. Part of the purpose of the ADOS movement is to provide opportunity
 7 and growth for a body of politics that focuses primarily on Black Americans who
 8 descended directly from United States Slavery and the Jim Crow Era.

9 39. In February of 2019 an ADOS logo was designed by Moore and
 10 Yvette Carnell and published as was a website under the domain ADOS101.com.

11 40. ADOS and #ADOS are the direct expression of the work product in
 12 form of shows and articles written and produced by Antonio Moore and Carnell over
 13 the course of nearly a decade. The two created the concepts from their work on
 14 wealth inequality, lineage, and more. ADOS is their voice and reputation expressed.

15 41. On February 22, 2019, Plaintiffs hosted Democratic presidential
 16 candidate Marianne Williamson on Moore's show to discuss the upcoming
 17 November 2020 election and Democratic party voting strategy. The show was filmed
 18 at DASH studios, broadcasted live on Moore's YouTube channel, and has amassed
 19 33,000 views and counting.

20 **Voter Disinformation Facts**

21 42. On October 4, 2019, Plaintiffs held the inaugural ADOS conference.
 22 Historically Black College/University (HBCU) Simmons College of Kentucky in
 23 partnership with St. Stephens church a black church in Louisville, Kentucky hosted
 24 the conference. The event featured Democratic Congressman John Yarmuth,
 25 Democratic Presidential candidate Marianne Williamson, and Dr. Cornel West.

1 43. Plaintiffs stated the national position for the ADOS movement was to
2 be active in voting in the 2020 election. Plaintiffs also made clear the strategy was
3 to vote down ballot Democrat if the agenda items [ADOS] set forth were not
4 addressed.

5 44. According to the New York Times, over 1,000 people
6 attended this national conference.¹ The New York Times sent a reporter and
7 photographer across country to attend the inaugural ADOS conference.

8 45. All conference guest-lecturers were left leaning progressives, with both
9 John Yarmuth and Marianne Williamson being part of the Democratic Party.

10 46. The goal of the conference was to leverage the position of Black voters
11 and to secure commitments from the eventual presidential nominee.

12 47. Down-ballot Democratic voting strategy consists of voting
13 Democrat across the voting options while leaving the presidential choice open. Said
14 strategy allows Black voters to leverage their power as the base of the Democratic
15 party without handing their votes to the Republican party, nor abstaining from the
16 election process.

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¹ Stockman, Farrah "Deciphering ADOS: A New Social Movement or Online Trolls?" New York Times
11/13/2019 <https://www.nytimes.com/2019/11/13/reader-center/sleazy-descendants-ados.html>

1 48. On January 19, 2020, ABC News covered the ADOS movement.²
2 In the national piece, the article clarified the ADOS movement, Antonio Moore, and
3 Yvette Carnell collectively and individually advocated voting for the Democratic
4 Party. The article stated “*ADOS is also intent on sending a controversial message*
5 *during the 2020 elections, which it pushed during the October conference --*
6 *proposing a strategy of voting down-ballot Democrat unless the Democratic*
7 *nominee advances what Moore calls a ‘black agenda.’”*

8 49. Harvard and the papers authors were fully aware of the aforementioned
9 ABC news article. Accordingly, Defendants were on notice that ADOS, Carnell and
10 Moore’s position was in support of the Democratic party.

11 50. Indeed, the Harvard Disinformation Paper cited to this same ABC news
12 article. Defendants knew the purpose of the voting down-ballot strategy proposed

13 **ADOS’ insertion in the 2020 elections**
14 **ABC NEWS ARTICLE**
15 ADOS is also intent on sending a
16 controversial message during the 2020
17 elections, which it pushed during the
18 October conference -- proposing a strategy
19 of voting down-ballot Democrat unless the
20 Democratic nominee advances what Moore
21 calls a “black agenda” -- a tactic that at least
22 one Pew Research study suggests helped
23 affect the outcome in 2016, and the election
24 of Republican President Donald Trump.

25 And it’s a move that runs counter to
26 Democrat-led efforts to protect voters’
27 rights, particularly of historically
28 disenfranchised groups like Black
Americans. House Democrats recently
passed legislation that would shore up
voting rights and reduce gerrymandering.

1/20 ABC News Article states the
ADOS position was Down Ballot Democrat

- We document how the ADOS network leverages Black identity and breaking news to implicitly or explicitly support anti-Black political groups and causes, strategically discouraging Black voters from voting for the Democratic party.
- The ADOS network has remained largely silent about the impact of the novel coronavirus on Black communities, undermining its claims to prioritize the interests of Black Americans.

HARVARD PAPER
• We give the tactic *disinformation creep* to this method of combining legitimate grievances along with slight factual distortions and reinterpretations of breaking news events that culminate in a contradictory worldview, at odds with the interests the worldview purports to support.

1/21 Harvard Misinformation Paper states ADOS discouraged Black voters from voting for the Democratic party

² Lynn, *Sanara* “*Controversial group ADOS divides black Americans in fight for economic equality*”. ABC News 01/19/2020 <https://abcnews.go.com/US/controversial-group-adns-divides-black-americans-fight-economic/story?id=66832680>

1 by Plaintiffs was to advance a Black agenda. Despite this knowledge, the
2 Defendants fraudulently reframed the Plaintiffs' position as "*discouraging Black*
3 *voters from voting for the Democratic Party*" to purposefully depict Plaintiffs
4 inaccurately. Defendants purposefully omitted Plaintiffs' actual position.

5 51. In this same ABC article, Plaintiffs further clarified ADOS' vision is
6 inclusive in that it would benefit all black people, not just ADOS. Despite citing
7 this exact ABC News article, the Harvard Kennedy School ignored and omitted key
8 facts.

9 52. Defendants Disinformation paper contained an oppositional and
10 unsupported position, which included insinuations of Russian disinformation and
11 claims of xenophobia. Defendants had no evidence to support such claims.

12 53. The effect of Defendants' purposeful omissions has allowed readers to
13 create their own inferences based on Harvard's fraudulent misrepresentations
14 because of Harvard's reputation. Because it is Harvard, readers would likely infer
15 truth or at least due diligence on the part of Harvard.

16 54. As illustrated in the below block quote from the Harvard
17 Disinformation Paper on ADOS, the authors broadly discuss background on Russian
18 disinformation and tie it to ADOS and Plaintiffs. Defendants claim that it is "*natural*
19 *to suspect*" ADOS of being propped up by Russian activity. Further, the citations
20 used to support this allegation (Alba 2020 or Ward et al 2020) do not make any
21 mention or reference to ADOS.

22 *Russian campaigns are likely indifferent to whether they help or hurt*
23 *Black Americans, although the involvement likely helped a struggle*
24 *for justice in the 1930s but hurt Black Americans in 2016. It is then*
25 *natural to suspect ADOS of being propped up by Russian activity like*
26 *similar campaigns in 2016 (Alba, 2020; Ward et al., 2020).*

1 55. On June 20, 2020, lead author of the Harvard Kennedy School ADOS
2 Disinformation paper, Mutale Nkonde, spoke at Stanford Center on Philanthropy
3 and Civil Society (Stanford PACS) in a Stanford PACS presentation. In her
4 presentation, Defendant Nkonde stated the position of ADOS and Plaintiffs was to
5 vote down ballot for specific demands. Nkonde’s presentation and acknowledgment
6 of ADOS strategy occurred a full six months before the Harvard Disinformation
7 paper was published.



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9 Try this site let's start pushing it to help
10 people get informed. ballotready.org
11 Put in your address then press ((Research
12 ballot to get information on all candidates
13 and propositions in your state.)) Check it
14 out.



15
16 **Every candidate
17 and referendum,
18 explained.**

19 Your ballot explained
20 ballotready.org

21 2:05 PM - 10/4/20 - Twitter by @lup...

22 180 Retweets 15 Quote Tweets 243 Likes
23 10/04/20 Tweet by ADOS cofounder
24 Antonio Moore providing ballot guides

25 56. On October 4, 2020, one month
26 before the 2020 Presidential election Plaintiff
27 Moore tweeted a ballot explainer to inform Black
28 Americans generally and ADOS followers more
specifically about local, state and national voting
options nationwide. This online “explainer” broke
down all elections nationwide and is pictured to
the left.

COVID-19 Disinformation Facts

29 57. Directly contrary to the claims of the Harvard Disinformation Paper,
30 Moore was among the first in the Black community to distribute responsible and
31 accurate information about COVID-19.
32

1 58. On February 28, 2020, Eurweb, a black media site with hundreds of
2 thousands of followers covered Antonio Moore's show entitled "Coronavirus
3 (COVID-19) Explained – How to Make Sure You're Prepared."³ This coverage
4 occurred nearly one year prior to the publication of the Harvard Disinformation

5 🌐 **Rashidbelike** @Rashidbelike · Mar 12, 2020
6 That feeling you get when you actually listened to @tonetalks &
7 @BreakingBrown so now your family got water, N95/3M masks 2 hand
8 Generators,
9 #Coronavirus #Covid19 Explained - How to make sure you're prepared.
10 youtu.be/th8AAxUFjIA via @YouTube



Paper and one
month after the
first U.S.
laboratory-
confirmed case
of COVID-19
in the United
States.

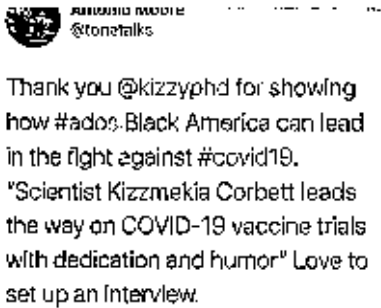
18 59. The "Coronavirus Explained" video has over 21,000 views. Plaintiff
19 Moore discussed COVID-19 concerns specifically for the African American
20 community. Plaintiff also implored people to be safe and explained how to prepare
21 responsibly.

22 60. The show was among the first in the Black community to report on
23 COVID-19. In the video Plaintiff referenced information from scientist at the time
24 as reported on NPR, The Guardian, and Slate among others.

27 ³ Eurpub "WATCH: Coronavirus (Covid-19) Explained – How to Make Sure You're Prepared." Eurweb 02/2020
<https://eurweb.com/2020/02/28/watch-coronavirus-covid-19-explained-how-to-make-sure-youre-prepared/>


1 61. The internal reviewer retained by Defendant Harvard specifically
2 referenced Moore’s “Coronavirus Explained” video when pointing to the flaws
3 contained within Defendants’ Disinformation paper.

4 62. This same video was further circulated on St. Stephen Church’s online
5 television network. St. Stephen Church is the largest African American Church in
6 Kentucky with over 15,000 members. St. Stephen’s used Plaintiff’s explanatory
7 Coronavirus video to inform their congregation about COVID-19.

8  63. On April 12, 2020, Antonio Moore tweeted
9 Thank you @kizzlyphd for showing
10 how #ados-Black America can lead
11 in the fight against #covid19.
12 “Scientist Kizzmekia Corbett leads
13 the way on COVID-19 vaccine trials
14 with dedication and humor” Love to
15 set up an interview.



16 The woman leading COVID-19 vaccine trials is
17 “not your average pocket-protector scientist”
18 nbcnews.com

19 6:58 PM - 4/12/20 - Twitter for iPhone
20  View Tweet activity 04/12/20 Tweet by ADOS @ADOS
21 Retweeted by 7000+ on Covid-19

22 19 in detail. Plaintiff discussed the coronavirus stimulus roll out and the impact it
23 had on American families. Plaintiff Moore’s show was once again covered on the
24 popular Black media site, Eurweb.

25 66. On June 20, 2020, lead author of the Harvard Kennedy School ADOS
26 Disinformation paper Mutale Nkonde spoke at Stanford Center on Philanthropy and
27 Civil Society (Stanford PACS).

28 ⁴ Burpub “Due to Covid-19 Unemployment is Rising, the Stimulus is Late & Some May Not Get it At All. Are we Prepared? (WATCH)” Eurob
04/17/20 <https://eurweb.com/2020/04/17/due-to-covid-19-unemployment-is-rising-the-stimulus-is-late-some-may-not-get-it-at-all-are-we-prepared-watch/>

1 67. In her presentation⁵, Nkonde shared her work on “disinformation
2 creep” – or the use of coronavirus disinformation to sow resentment and distrust of
3 government among Black communities, with the aim of reducing Black voter turnout
4 and further disenfranchisement of communities of color. Nkonde targeted ADOS
5 and specifically mentioned Plaintiffs, Moore and Carnell by name. Nkonde asserted
6 ADOS and Plaintiff directly participated in “disinformation creep.”

7 68. During this same June 2020 Stanford PACS speech, Harvard Kennedy
8 School Disinformation paper’s lead author Mutale Nkonde explicitly admitted she
9 knew the ADOS movement was active in COVID-19 discussions prior to June of
10 2020. However, six months later on January 18, 2021 Nkonde purposefully and
11 fraudulently omitted all facts she knew of ADOS discussing COVID-19 when she



Home | Health

**WATCH: Coronavirus (Covid-19)
Explained - How to Make Sure You're
Prepared.**

By Eurpub February 26, 2020



23 *Attorney Antonio Moore discusses the
24 **Coronavirus aka Covid-19** and how to
25 2/20 Eurweb Article Tonetalks Show & ADOS group
26 discuss Covid and its impact on Black America

ESSAY SUMMARY **HARVARD PAPER**

- We carried out a descriptive content analysis of tweets from Twitter accounts that used the #ADOS hashtag, using a combination of 534 thousand scraped tweets and 1.36 million tweets from the Twitter firehose, between November 2019 and September 2020.
 - We document how the ADOS network leverages Black identity and breaking news to implicitly or explicitly support anti-Black political groups and causes, strategically discouraging Black voters from voting for the Democratic party.
 - The ADOS network has remained largely silent about the impact of the novel coronavirus on Black communities, undermining its claims to prioritize the interests of Black Americans.
 - We give the name *disinformation creep* to this method of combining legitimate grievances along with slight factual distortions and reinterpretations of breaking news events.
- 1/21 Harvard Misinformation Paper states ADOS remained largely silent about coronavirus impact on Blacks

⁵ Stanford PACS “Protecting the Black vote during Covid 19” 06/20/2020 <https://digitalimpact.io/race-tech-civil-society-protecting-the-black-vote-during-covid19/>

1 published in the Harvard Disinformation paper that ADOS was "largely silent
2 about the impact of the novel coronavirus on black communities..."

3 **Release Of The Document**

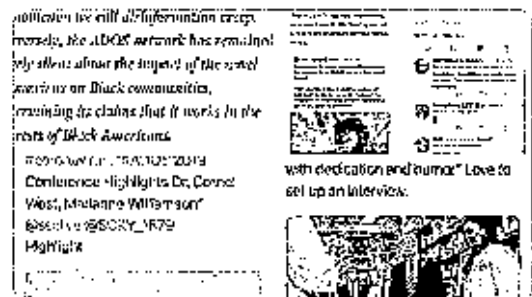
4 69. On January 18, 2021, Harvard Shorenstein Center of the Harvard
5 Kennedy School published: "Disinformation Creep: ADOS And The Strategic
6 Weaponization Of Breaking News." As part of their Special Issue on Disinformation
7 in the 2020 Elections.

8 70. The Authors are listed as: MUTALE NKONDE Center for the Study of
9 Ethnicity and Race, Columbia University, MARIA Y. RODRIGUEZ School of
10 Social Work, University at Buffalo, LEONARD CORTANA Tisch School of the
11 Arts, New York University, JOAN K. MUKOGOSI Liberal Studies, New York
12 University, SHAKIRA KING AI for the People, RAY SERRATO MoveOn,
13 NATALIE MARTINEZ MoveOn, MARY DRUMMER MoveOn, ANN LEWIS
14 MoveOn , MOMIN M. MALIK MoveOn, Guest-edited by Dr. Ann Crigler
15 (Professor of Political Science, USC) and Dr. Marion R. Just (Professor Emerita of
16 Political Science, Wellesley College).

17
18 **Demand for Retraction Facts**


19 71. On January 21, 2021, three
20 days after the release of "Disinformation
21 Creep: ADOS And The Strategic
22 Weaponization Of Breaking News,"
23 Plaintiffs and ADOS made informal
24 demands for retraction via Twitter.

Understand the inaccuracy in your paper @Harvard
@Kennedy_School @ShorensteinCtr. #ados was
discussing Coronavirus under #Covid19. Your paper
literally doesn't pickup these tweets because they use
the virus alternate name. We cancelled our #adins
conference due to #covid19. 🤔



3:06 PM · Jan 23, 2021 · Taken for iPhone

(1/23/21) Tweet by ADOS cofounder Antonio Moore notifying
Harvard Kennedy School, Shorenstein Center, and Harvard of paper inaccuracies.

1  Antonio Moore
@tonetalks
2 WATCH AND SHARE - @IceCube & @Tonetalks Talk
Meeting with President Joe Biden & the Untruthful
3 @Harvard @ShorensteinCtr @Kennedy_School #ados
Research Paper - Watch Full Show Here:
4 youtu.be/sLgGZLYgibw



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7
8 72. On February 11, 2021, Plaintiff Moore once again demanded retraction by Harvard via his YouTube platform. The show was covered by Black media site Eurweb.⁶ And has over 33,000 views with thousands more that watched and interacted on the live chat.

9
10 73. Plaintiff Moore demanded retraction again when he reposted his show on Twitter and directly tagged Defendants in his tweet. Moore tweeted his show to Shorenstein Center, Harvard Kennedy School, and Harvard and notified them of the errors with the Harvard Kennedy School Disinformation paper.

11
12 74. On June 30, 2021, Plaintiffs formally requested a retraction. Said retraction request was sent directly to Harvard Kennedy School's Shorenstein Center, of which, Harvard Shorenstein recognized receipt in their internal review.

13
14 **Further Instances of Disinformation**

15
16 75. Despite the Plaintiffs expressing clear condolences for the passing of Chadwick Bozeman the actor who played Black Panther, the Harvard paper referenced them as "silent on the actors passing." On August 28, 2020, Moore tweeted on his passing saying "Deep condolences to his family for their loss. Black Panther Star Chadwick Boseman dies of cancer at 43." Carnell also tweeted condolences including the hashtag #ADOS. Despite this the Harvard ADOS

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26 ⁶ Eurpub "Ice Cube & Tonetalks Talk Meeting with President Joe Biden & the Untruthful Harvard Research Paper (WATCH)" 02/11/22
<https://eurweb.com/2021/02/11/ice-cube-tonetalks-talk-meeting-with-president-joe-biden-the-untruthful-harvard-research-paper-watch/>

27 ⁷ ADOS Foundation "Smear-Reviewed: a Response from the ADOS Advocacy Foundation to Harvard Kennedy School's Disinformation creep"
06/30/2021 https://adosfoundation.org/media/2021/06/ADOS_Harvard_Rebuttal_SmearReviewed.pdf

249 East Ocean Boulevard, Suite 201
Long Beach, CA 90802
Telephone: (562) 504-5200



Antonio Moore
@tenotalks

Deep condolences to his family for their loss. "Black Panther" star Chadwick Boseman dies of cancer at 43"



"Black Panther" star Chadwick Boseman dies of cancer at 43
abcnews.go.com

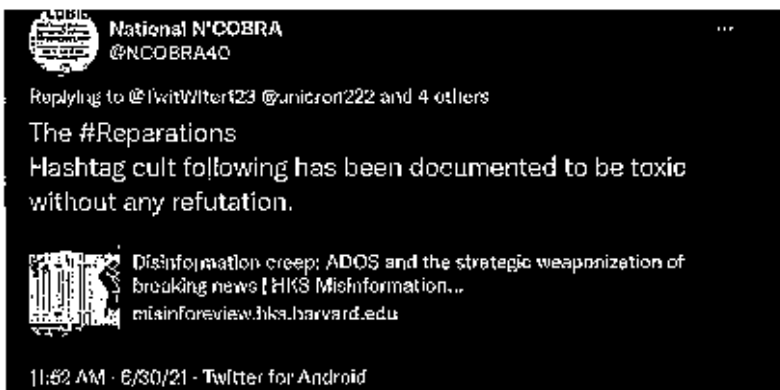
10:40 PM · 8/28/20 · Twitter for iPhone

77 Retweets · 3 Quote Tweets · 349 Likes

Disinformation Paper directly attacked Plaintiffs Antonio Moore and Carnell passing off a tweet 4 days later and omitting this tweet. The Disinformation Paper stated "his passing on August 28, 2020, barely registered in the ADOS conversation" totally ignoring the August 28, 2020 tweet by Moore that had 349 likes and the tweets by Carnell.

76. In and around March 2021, Kamm Howard National Male Co-chair of NCobra and NAARC commissioner appeared as a guest on the show "Muwakkalli's World." N'Cobra and NAARC are preeminent Black reparations movements.

77. The co-chair and commissioner relied on Harvard's disinformation paper and declared on a public platform that ADOS engaged in a disinformation campaign with a primarily antiblack motive.⁸



78. On June 30, 2021, Reparations group National N'Cobra, relying on the legitimacy of Harvard, further circulated

⁸ Muwakkallis World "WIFTB presents Muwakkallis World" 56:40 (3/24/21) <https://www.youtube.com/watch?v=phJvp4mS1BU>

1 Harvard Disinformation paper; stating the paper proves ADOS and Plaintiff were
2 “toxic without refutation.”

3 79. Harvard Kennedy School ADOS Disinformation paper was used to
4 attack the ADOS movement and founders Yvette Carnell and Antonio Moore via
5 citation in a paper by the Council for the Development of Social Science Research
6 in Africa (CODESRIA).⁹

7 80. Harvard Kennedy School’s ADOS Disinformation paper was taught by
8 Professor Francesca Tripodi in the University of North Carolina Class
9 “Disinformation and Society”¹⁰ in or around 2021.

10 81. At NO POINT prior to the publication did any of the Defendants
11 contact Plaintiff about the article’s accuracy.

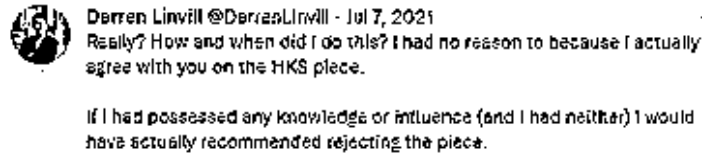
ADOS Disinformation Paper Review Facts

⁹ Aiwayer, Jessica Ann “The Danger of ADOS: How Disinformation Campaigns Threaten Reparations and Pan-African Movements through Digital Media” 2021 <https://coherent-commons.s3.amazonaws.com/artifacts/artifact/img/a1675b72-6f8e-4376-b05b-990c70fd584d.png>

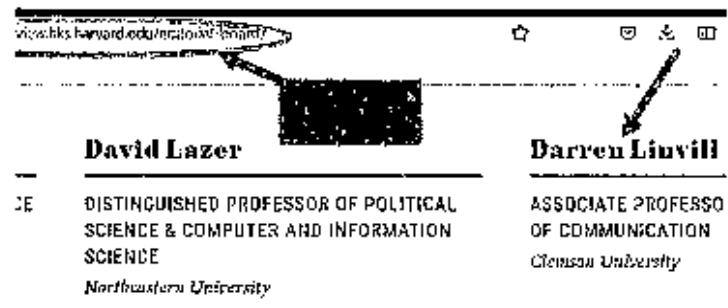
¹⁰ Tripodi, Francesca “Disinformation and Society” UNC 2021
https://ils.unc.edu/courses/2021_fall/ins690_290/TNLS%20690%20Syllabus+Fall%202021+Tripodi.pdf

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82. On July 7, 2021, Darren Linvill, a member of the Harvard Kennedy School's Misinformation Review



Editorial Board, admitted via twitter he would have recommended rejecting the ADOS disinformation paper.



83. In and around August 2021 Harvard commissioned an internal and external review of the Harvard Kennedy School ADOS

Disinformation paper in response to ADOS request for retraction.

84. The internal review was conducted and submitted August 7, 2021 by Alexei Abrahams, Ph.D., Data Scientist at the Harvard Kennedy School. In summary he found:

In summary, while the rebuttal draws on some evidence from outside of the study's data collection period, I generally find their (ADOS) criticisms to be justified. The argument by Nkonde et al 2021 appears to rely entirely on subjective interpretations of a handful of tweets tweeted by the ADOS movement's founders, Yvette Carnell and Antonio Moore. While these interpretative claims occur within an atmosphere of scientific method and big data, the role of these data and methods is never clarified, leaving the reader to wonder if they factored in at all.¹¹

¹¹ Abrahams, Alexei "Internal Review- Harvard Disinformation Paper" https://misinforeview.hks.harvard.edu/wp-content/uploads/2021/12/internal_review.pdf

1 85. The external review which was submitted ten days later August 18,
2 2021 by Bruce Desmarais, Ph.D., Professor of Political Science, at Penn State
3 University. Dr. Desmarais also found the Harvard Disinformation paper's authors
4 claims were unsupported.

5 86. Despite these August internal and external reviews, which illustrated
6 that retraction was necessary, Defendants waited an additional four months, until
7 late December to formally retract the paper. Defendants did so without any regard
8 to the continued damage to Plaintiffs' reputations. Defendants chose to release the
9 retraction on December 20, 2021, when much of the media and many others are
10 occupied preparing for the Holidays.

11 87. Mutale Nkonde and other authors of the ADOS Harvard Kennedy
12 School Disinformation Paper cherry picked tweets to support a fraudulent and
13 baseless position surrounding Carnell, Moore and the ADOS movement. Defendants
14 omitted key facts from the ABC news article, which showed Plaintiffs and ADOS
15 were in support of the Democratic Party. Defendants omitted the Eurweb coverage
16 on Plaintiffs, which showed Plaintiffs informed Black Americans about COVID-19.

17 88. In or around August of 2021 authors of the Harvard Disinformation
18 paper drafted a collective response.¹² The response repeated the paper's errors and
19 added additional evidence, which demonstrated Defendants lack of understanding
20 regarding the underlying purpose and motivations of the ADOS movement.

21 89. In their response to the Shorenstein commissioned internal and
22 external reviews, Defendants admitted that they did not look beyond the cherry
23 picked tweets of Plaintiffs because it would take longer, "*...we did not do a*
24 *systematic analysis of content here because it would have taken much longer, and*
25 *we prioritized making timely findings.*"

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27 ¹² Nkonde, Mutale et al. "Response to Internal & External Reviews" September 2021 <https://retractionwatch.com/wp-content/uploads/2021/12/Nkonde-et-al-Response-to-the-Misinformation-Review.pdf>

1 90. The Harvard Kennedy School ADOS Disinformation paper did not
2 receive proper review but was released by Harvard Kennedy School. The paper was
3 held out as a research paper despite the very little to no research involved in its
4 publication.



5
6 People (AFP) is a nonprofit communications firm, whose mission is to add a racial justice analysis to all discussions about tech. Prior to starting AI for the People, Nkonde worked in AI Governance. During that time, she was part of the team that introduced the Algorithmic Accountability Act, the DEEP FAKES Accountability Act, and the No Biometric Barriers to Housing Act to the US House of Representatives.

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10 In 2021 Nkonde was the lead author of Disinformation Creep: ADOS and the Weaponization of Breaking News, Harvard Kennedy School Misinformation Review, this detailed the findings from computational analysis that informed the development of an online intervention against a disinformation campaign targeting Black voters during the 2020 US Presidential Election. AI for the People recently co-produced a film with Amnesty International to support the ban the scar campaign, a global push to ban facial recognition. She was most recently featured in CNN's United Shades of America where she discussed techno racism, which describes how technical the system we use in our everyday live become encoded with racial bias.

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91. Lead author Mutale Nkonde has biographies posted online that still reference the retracted Harvard Kennedy School ADOS paper, yet does not mention that the paper was in fact retracted. One such is posted on the Council on Foundation

website, where Nkonde is on the board of directors.

17 92. On December 20, 2021, nearly a full year after publishing the
18 Harvard Kennedy School ADOS Disinformation paper, Harvard Kennedy School
19 retracted the ADOS Disinformation paper citing a *"failure in their editorial
20 process."*¹³ Retraction was partly due to the fact that the paper contained certain
21 conclusions, which were declared unreliable or invalid.

22 93. According to science.org, "retractions appear to be relevantly rare
23 involving only two of every 10,000 papers."¹⁴

24
25 ¹³ Harvard Shorenstein Center "Retraction note to: Disinformation creep: ADOS and the strategic weaponization of breaking news" Harvard
26 Kennedy School 12/20/21 [https://misinformationview.hks.harvard.edu/article/retraction-note-to-disinformation-creep-ados-and-the-strategic-
27 weaponization-of-breaking-news/](https://misinformationview.hks.harvard.edu/article/retraction-note-to-disinformation-creep-ados-and-the-strategic-weaponization-of-breaking-news/)

¹⁴ Brainard, Jeffrey & Lou, Jia Science.org "What a massive database of retracted papers reveals about science publishing's 'death penalty'"
28 Science.org 10/25/2018 [https://www.science.org/content/article/what-massive-database-retracted-papers-reveals-about-science-publishing-s-
death-penalty](https://www.science.org/content/article/what-massive-database-retracted-papers-reveals-about-science-publishing-s-death-penalty)

1 process with only a 34% acceptance rate generally. They further say 0% of
 2 submissions were accepted after initial review. And 21% were accepted after a first
 3 review and 13% after a second or third revision.

4
 5 **In Conclusion**

6 97. Harvard Kennedy School and the misinformation review; effectively
 7 used and weaponized the vague concept of misinformation to actually and
 8 fraudulently, and perhaps purposely misinform anyone that would read this
 9 academic paper to damage the reputations of the Plaintiffs in irreparable ways.

10 98. The Harvard Kennedy School ADOS Disinformation paper has
 11 caused immeasurable harm to the Plaintiffs. Defendants Harvard Kennedy School
 12 ignored their error for nearly a full year. And even now authors are speaking about
 13 the paper in presentations without admitting to their failure.

14 99. On December 15, 2021 lead author Mutale Nkonde wrote her own
 15 personal reply to the retraction stating culpability for any errors should be jointly
 16 shared between the authors and Harvard Kennedy School. Stating "*This paper
 17 passed peer review and the Review accepted the paper so accountability for
 18 any inaccuracies must be jointly shared between journal and author.*"¹⁶

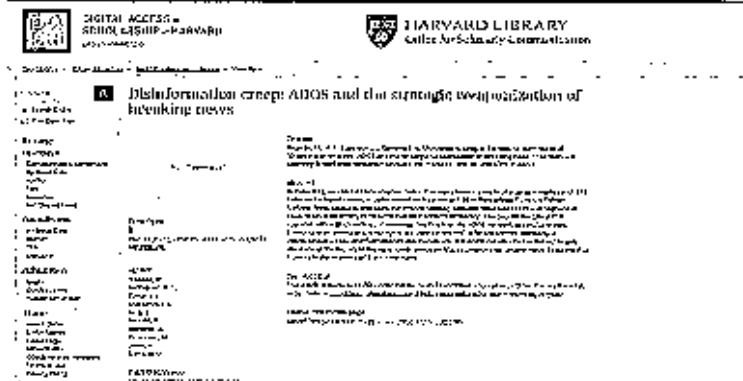
19 100. Despite retraction by Harvard Kennedy School
 20 after both and internal and external reviews commissioned by the Shorenstein Center
 21 [lead author Nkonde] stated in her response to those reviews. "*We stand by our
 22 efforts and learnings...*"

23 101. Even after the article retraction, the lead author is traveling and
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27 ¹⁶ Nkonde, Mutale. "Letter responding to Harvard Review" 12/15/21 <https://retractionwatch.com/wp-content/uploads/2021/12/Mutale-Nkonde-Letter-to-Misinfo-Review-1.pdf>

1 speaking using the paper as a source. See presentation by Mutale Nkonde at
2 Universitat Hamburg of Germany¹⁷. In the presentation that comes nearly a month
3 after the retraction, lead author Mutale Nkonde wildly makes the same unfounded
4 arguments alluding to the retraction not being based on fraud and gross negligence
5 but rather oddly speaks of her own race and gender despite all the facts pointing to
6 the Harvard Kennedy School Disinformation paper largely being retracted because
7 it was fraudulent.

8 102. As of June 1, 2022, Digital Access to Scholarship at Harvard
9 aka dash.harvard.edu still
10 listed the article without the
11 retraction. Over a year after
12 originally publishing the piece
13 and over five months after the
14 retraction.



17 **History of connection of Moveon.org and the Democratic Party.**

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19 103. Despite a clear conflict that is noted at the very bottom of the Harvard
20 Kennedy School ADOS paper, Harvard allowed Moveon, a nonprofit, which
21 strongly supports the Democratic party to play a main role in creating and
22 publishing this fraudulent paper. Moveon supplied salaries to five of the ten authors
23 during the project. Moveon.org and it's staff was able to use the prestige of Harvard
24

26 ¹⁷ Universitat Hamburg "Nobody Understands: Why we Need Intersectional Approaches to Protect Black Women Online" 01/05/22
27 <https://lecture2go.uni-hamburg.de/l2go/-/get/v/60402>

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1 and the veil of academic rigor that Harvard has admitted in their retraction was
2 never met due to a *“failure in their editorial process”* to defame Plaintiffs.

3 104. This civil action seeks compensatory damages from Defendants for
4 violating various rights under the United States Constitution and state law in
5 connection with the Negligent and Defamatory publication concerning the
6 Plaintiff, included in the Harvard Shorenstein Center of the Harvard Kennedy
7 School of Government product: *“Disinformation Creep: ADOS And The Strategic
8 Weaponization Of Breaking News,”* which occurred on Date January 18, 2021.
9

10 **FIRST CLAIM FOR RELIEF**
11 **DEFAMATION**

12 **(By Harvard University, Authors And DOES 1-100)**

13 105. The Plaintiffs repeat and reallege each and every allegation contained
14 in the preceding paragraphs of this Complaint and incorporate those allegations by
15 reference with the same force and effect as if fully set forth herein.

16 106. Defendants and **DOES 1-100** acted to publish multiple false and
17 defamatory statements of and concerning the Plaintiffs to a third party.

18 107. Defendants **and DOES 1-100** knew the statement was false; OR acted
19 in reckless disregard as to whether the statement was true or false; OR acted
20 negligently in failing to ascertain whether the statement was true or false before
21 publishing it.

22 108. As a result of the conduct of Defendants **and DOES 1-100** the
23 defamatory statement caused the Plaintiffs economic loss, constituted libel, and
24 prejudiced the Plaintiffs’ profession or business.
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1 **NEGLIGENCE**

2 **(By Harvard University, Authors And DOES 1-100)**

3 120. The Plaintiffs repeat and reallege each and every allegation contained
4 in the preceding paragraphs of this Complaint and incorporate those allegations by
5 reference with the same force and effect as if fully set forth herein.

6 121. Defendants **and DOES 1-100** have a duty to use reasonable care to
7 prevent harm or injury to others.

8 122. Defendants **and DOES 1-100** failed to use reasonable care under all
9 circumstances, and thus breached this duty of care.

10 123. Defendants **and DOES 1-100** failure to use reasonable care was a cause
11 of Plaintiff's injury or harm.

12 124. Plaintiffs' bring this claim individually and seeks general and special
13 damages, in an amount to be determined at trial.

14 WHEREFORE, the Plaintiffs demand judgment and damages against the
15 Defendants, Harvard University, et al, jointly and severally in a sum to be
16 determined at trial, but sufficient to meet the jurisdictional requirements of this
17 Honorable Court, plus interest, costs and attorneys' fees.

18 **FIFTH CLAIM FOR RELIEF**

19 **VICARIOUS LIABILITY FOR AGENTS**

20 **(By Harvard University, Authors And DOES 1-100)**

21 125. The Plaintiffs repeat and reallege each and every allegation contained
22 in the preceding paragraphs of this Complaint and incorporate those allegations by
23 reference with the same force and effect as if fully set forth herein.

24 126. As a result of their conduct, Defendants **and DOES 1-100** are liable for
25 PLAINTIFFS injuries and harm, either because they were integral participants in
26 the misconduct, or because they failed to intervene to prevent these violations.

1 127. As a direct and proximate result of the aforementioned wrongful acts
2 of Individual Defendants **and Does 1-100**, individually and as agents of Harvard
3 University.

4 128. The conduct of Individual Defendants **and Does 1-100** are considered
5 agents as someone authorized by the person who hires the agent to act on the
6 principal's behalf and for the principal's benefit. This relationship can be either
7 express or implied from circumstances of a situation.

8 129. Once the agency is established, knowledge of the agent of certain facts
9 learned within the scope of its agency can be imputed to the principal. This means
10 that the principal can be held to know things which are told to [his/her] agent, and
11 any facts disclosed to or learned by the agents during their scope of engagement can
12 be imputed to the principal and deemed to have been within [his/her] knowledge.

 WHEREFORE, the Plaintiffs demand judgment and damages against the
Defendants, Harvard University, et al, jointly and severally in a sum to be
determined at trial, but sufficient to meet the jurisdictional requirements of this
Honorable Court, plus interest, costs and attorneys' fees.

PRAYER FOR RELIEF

18 WHEREFORE, the Plaintiffs demand judgment and damages against the
19 Defendants, Harvard University, et. al, jointly and severally in a sum to be
20 determined at trial, but sufficient to meet the jurisdictional requirements of this
21 Honorable Court, plus interest, costs and attorneys' fees.
22

23 WHEREFORE, the Plaintiffs pray that this Honorable Court enter the
24 following relief:
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- 26 a. Enter judgement on each Count of the Complaint
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- b. Determine the amount of damages suffered by the Plaintiffs on each Count of the Complaint.
- c. That the Plaintiffs be awarded reasonable attorneys' fees and costs; and
- d. For such other and further relief as this Court may deem reasonable.

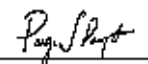
DEMAND FOR JURY TRIAL AS TO ALL CLAIMS SO TRIABLE

Plaintiffs hereby demands a trial by jury as to all claims and issues so triable.

Dated: July 1, 2022

Respectfully Submitted,
By its attorneys
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By: 
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By: 
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COMPLAINT FOR DAMAGES