

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:24-cv-00644**

**MARK KEITH ROBINSON,**

**Plaintiff,**

**v.**

**CABLE NEWS NETWORK, INC.,  
LOUIS LOVE MONEY,**

**Defendants.**

**DEFENDANTS' NOTICE OF  
REMOVAL**

28 U.S.C. §§ 1332, 1441, 1446

**Removed From:**

Wake County Superior Court  
Civil Action No. 24 CV 032897-910

Defendant Cable News Network (“CNN”) pursuant to 28 U.S.C. §§ 1441 and 1446, remove this action from the Superior Court of Wake County, North Carolina to the United States District Court for the Eastern District of North Carolina, on the grounds that there is jurisdiction under 28 U.S.C. § 1332(a).

**BACKGROUND**

1. On October 15, 2024, Plaintiff Mark Robinson filed the defamation action captioned *Mark Robinson v. Cable News Network, Inc. and Louis Love Money*, Case No. 24-CV-032897-910, in the Superior Court of Wake County, North Carolina.

2. Robinson brings claims against two different defendants – Defendant Louis Love Money (“Money”) and Defendant Cable News Network (“CNN”) – based on unrelated statements made about him at different times. These are two different cases joined together for the improper purpose of destroying diversity.

3. CNN is not affiliated with Money in any way. There is no allegation that anyone at CNN has even spoken to Money at any time ever. And the allegedly defamatory statements

Robinson claims Money made are different in content than those he claims CNN made. In short, Robinson's claims against Money have nothing to do with Robinson's claims against CNN.

4. Robinson's claims against CNN are meritless and CNN will make those arguments to the Court in due course.

5. Money is named in this lawsuit for one purpose and one purpose only – to defeat diversity jurisdiction and preclude removal. Robinson's gambit, however, fails because Money is fraudulently joined in this action. Not only is there no connection between Money and CNN, but also there is no possibility that Robinson can succeed on his claims against Money. Jurisdiction is, therefore, proper in this Court.

**A. The Claim as Alleged Against Defendant Money**

6. Robinson first alleges that Money defamed him in a song published on YouTube on August 11, 2024, and in an interview published in *The Assembly* magazine on September 3, 2024.

7. Money is a North Carolina resident who worked at adult film stores in the 1990s and early 2000s. In an interview with the online publication *The Assembly*, published in the September 3, 2024 article "Ex-Porn Shop Employees Say Mark Robinson was a Regular. He Denies It." (the "Assembly Article"), Money states Robinson was a "frequent customer" at some of these stores. Ex. 3 at 2. Money, along with other former employees, recount Robinson's visits to the shops where Robinson purchased "hundreds of bootleg porn videos that Money sold on the side." Money states that Robinson did not pay him \$25 for one of those videos. *Id.* The *Assembly* Article also includes a screenshot of a 2022 post from Money's Facebook page with a picture of Robinson and Money under the caption: "I disagree politically with this guy. However[,] we have always been cool. That's our Lt. Governor who still owes me money lol." *Id.* at 8.

8. The \$25 decades old debt is also the subject of a music video featuring the song “The Lt. Governor Owes Me Money” (Ex. 4), which is performed by Money’s band, Trailer Park Orchestra. Ex. 23 ¶ 4. The song includes the lyrics “I made you a bootleg. I did all the time. Most of the time you paid me, I guess it slipped your mind. I hate to remind you. Could you please not forget? You know where I live. Could you mail me a check?” Ex. 4 at 1:12-1:28.

9. Robinson’s claims against Money are based on these statements.

**B. The Claim as Alleged Against CNN**

10. Robinson alleges that Defendant Cable News Network, Inc. (“CNN”) defamed him in an article, published on September 19, 2024, entitled “‘I’m a black NAZI!’: NC GOP nominee for governor made dozens of disturbing comments on porn forum” (the “CNN Article”). Ex. 5.

11. Critical here, the CNN Article is about something entirely different than the Money statements. The CNN Article reported that Robinson made comments over a decade ago on the pornographic website, Nude Africa. As described in the Article, many of these comments were “gratuitously sexual and lewd in nature” and “frequently contained derogatory and racial slurs directed at Black, Jewish and Muslim people”. *Id.* at 11. These include “I like watching tranny on girl porn! That’s f\*cking hot! It takes the man out while leaving the man in! And yeah I’m a ‘perv’ too!” and “Slavery is not bad. Some people need to be slaves. I wish they would bring it (slavery) back. I would certainly buy a few.” *Id.* at 4. The sentiments expressed in many comments on Nude Africa conflict with Robinson’s current political positions.

12. The CNN Article explains that the posts were made by the username “minisoldr”, the same username that Robinson has used on other internet platforms such as X. *Id.* at 2, 7. The CNN Article further details how the journalist used Robinson’s biographical data, publicly available information, and his posts on other platforms to connect Robinson to the minisoldr account on Nude Africa. *Id.* at 7-9.

13. The CNN Article references the *Assembly* Article, noting that “CNN’s reporting on Robinson’s comments comes a few weeks after *The Assembly*, a North Carolina digital publication, reported that Robinson frequented local video pornography shops in the 1990s and 2000s.” *Id.* at 6. The CNN Article does not mention Money or his statements, and Robinson does not allege (nor could he) that anyone at CNN consulted Money in the course of its investigation.

### **C. ROBINSON’S PUBLIC STATEMENTS ABOUT THE LAWSUIT**

14. Robinson’s post-filing conduct and statements further demonstrate that there is no connection between the CNN Article and the Money’s statements. On October 15, 2024—the day the Complaint was filed—Robinson and his attorney held a press conference about the lawsuit. The majority of the approximately twenty-minute press conference was devoted to the CNN Article and the investigation Robinson’s counsel conducted into CNN’s reporting. Counsel also referred to the lawsuit as an “election interference case”, in part because a “left wing media outlet is going to stop [Robinson] from being governor”. *See* Ex. 6 at 12:00-13:06.

15. When a journalist posed questions about the claims against Money, Robinson’s counsel responded only that Money’s activities “were also defamatory.” *Id.* 13:10-13:29. The only other mention of Money during the press conference was in counsel’s opening remarks when he explained a defamation suit was filed against CNN and Money.

### **D. MONEY’S MOTION PRACTICE**

16. On October 16, 2024, Money filed a motion to dismiss the Complaint because it violated Rule 8(a)(2) of the North Carolina Rules of Civil Procedure. Under that rule, pleadings for punitive damages cannot specify a damage amount greater than \$25,000. The Complaint, in clear violation of this rule, alleged \$50 million dollars in damages. In the motion, Money theorized that “it has to be considered that the violation of Rule 8(a)(2) may have been for the very purpose of creating media attention for Mr. Robinson’s campaign by creating a rambling narrative

regarding CNN, Mr. Robinson, and a man who did an obscure video poking fun for Mr. Robinson for frequenting a pornography store . . . and for owing him \$25.” Ex. 21 at 2.

17. In response, on October 18, 2024, Robinson filed an Amended Complaint that seeks damages “in excess of twenty-five thousand dollars (\$25,000.00).” Ex. 23 at p. 16.

18. On November 4, 2024, Money filed his brief in support of the Motion to Dismiss. Ex. 22. Describing how no amendment could cure the Rule 8(a)(2) violation, he correctly notes that “[t]he jury pool has been tainted” and “[t]he media spectacle has occurred.” *Id.* at 2. The brief also makes clear that Robinson’s staff has exacerbated the violation. On October 22, days after the Amended Complaint was filed, a member of the Robinson campaign wrote on X: “When the full set of facts are presented to a jury, they are likely to award Robinson far in excess of \$50,000,000.” *Id.* at 2, 5.

## **GROUND FOR REMOVAL**

### **I. THE PARTIES**

19. Robinson alleges that he is a North Carolina resident. Ex. 23 ¶ 2.

20. The Amended Complaint alleges that Money is a North Carolina resident. *Id.* ¶ 4.

21. Defendant CNN is a Delaware corporation with its principal place of business in Georgia. *Id.* ¶ 3. For purposes of diversity jurisdiction, CNN is not a citizen of North Carolina.

22. Defendant Money is the only non-diverse defendant. His citizenship, however, should not be considered for jurisdictional purposes because he has been fraudulently joined in this suit.

### **II. FRAUDULENT JOINDER**

23. Fraudulent joinder is an exception to the requirement that diversity jurisdiction requires complete diversity. *Mayer v. Rapoport*, 198 F.3d 457, 461 (4th Cir. 1999). Under this doctrine, a federal court may “disregard, for jurisdictional purposes, the citizenship of certain non-

diverse defendants, assume jurisdiction over a case, dismiss the non-diverse defendants, and thereby retain jurisdiction.” *Id.* The doctrine thus allows courts to consider only those defendants who have a “real connection with the controversy” when determining whether diversity of citizenship exists. *See Hugger v. Rutherford Inst.*, 63 F. App'x 683, 688 (4th Cir. 2003) (citation omitted).

24. Here, Robinson’s own description of this lawsuit demonstrates that the controversy relates to Robinson’s (erroneous) claims about CNN’s news article, not Money’s statements. During the press conference announcing this lawsuit, Robinson started by saying that “we are taking the first steps to do exactly what I said I would do . . . We are holding CNN accountable.” Ex. 6 at 0:01-0:14. Robinson’s counsel focused his remarks on the “journalistic hit job” by CNN and his team’s investigation’s attempts to “get to the bottom” of CNN’s reporting. *Id.* at 1:00-3:18, 4:00-4:58. Money was never mentioned in the twenty-minute press conference except in response to a direct question from a reporter to Robinson’s counsel and when Robinson’s counsel named the defendants. *Id.* 1:51-2:35, 13:06-13:29. CNN is the only defendant with a real connection to the controversy.

25. Asserting a near frivolous claim against Money with zero connection to the CNN Article that is the focus of Robinson’s ire was intended solely to keep this case in North Carolina State Court and constitutes fraudulent joinder.

26. To establish fraudulent joinder, the removing party must demonstrate “either that the plaintiff committed outright fraud in pleading jurisdictional facts, or that there is no possibility that the plaintiff would be able to establish a cause of action against the in-state defendant in state court.” *Blackwood v. Berry, Dunn, McNeil & Parker, LLC*, 828 F. App'x 174, 175 (4th Cir. 2020) (internal quotation marks and citation omitted).

27. The “no possibility” standard is “not to be applied rigidly.” *Sheppard v. BAC Home Loans Servicing, LP*, No. 3:11-CV-00062, 2012 WL 204288, at \*4 (W.D. Va. Jan. 24, 2012). Instead, the court should ascertain “whether there is a reasonable basis for predicting liability based on the claims alleged.” *Id.* (citation and internal quotation marks omitted); *see also Hugger v. Rutherford Inst.*, No. 5:00CV180-H, 2001 WL 114397, at \*4 (W.D.N.C. Jan. 18, 2001), *aff’d*, 63 F. App’x 683 (4th Cir. 2003) (finding defendant was fraudulently joined where there was “no reasonable basis in fact to believe that Plaintiffs could maintain any state law claim” against that defendant); *Reeser v. NGK Metals Corp.*, 247 F. Supp. 2d 626, 629 (E.D. Pa. 2003) (noting when evaluating whether a defendant has been fraudulently joined, the court is “not required blindly to accept whatever plaintiffs may say no matter how incredible or how contrary to the overwhelming weight of the evidence”).

28. “[T]o determine whether an attempted joinder is fraudulent, the court is not bound by the allegations of the pleadings, but may instead consider the entire record, and determine the basis of joinder by any means available.” *AIDS Counseling & Testing Ctrs. v. Grp. W Television, Inc.*, 903 F.2d 1000, 1004 (4th Cir. 1990) (internal quotation and citation omitted). Therefore, “[t]he court may take judicial notice of documents attached to the notice of removal.” *Haynes v. Rocky Mount Cycles, Inc.*, No. 5:23-CV-591-D, 2024 WL 1623101, at \*3 (E.D.N.C. Apr. 15, 2024) (considering the discovery papers and affidavits and holding that a defendant had been fraudulently joined). In this case, this inquiry places CNN in the unusual position of arguing that Robinson’s claims against Money lack any possibility of success, even though CNN and Money are not affiliated in any way.

29. Here, there is no possibility that Robinson can prevail in his claim against Money because (1) Robinson cannot plausibly plead actual malice and (2) Robinson cannot establish that

Money's statements are defamatory.

30. Accordingly, because Robinson cannot sustain his action against Money in state court, the Court can disregard Money's citizenship and exercise diversity jurisdiction over this action.<sup>1</sup>

**A. Robinson Cannot Prevail On His Defamation Claim Against Money.**

31. To prevail on a defamation claim against Money, Robinson must be able to show that Money "made false, defamatory statements of or concerning the plaintiff, which were published to a third person, causing injury to the plaintiff's reputation." *Griffin v. Holden*, 180 N.C. App. 129, 133, 636 S.E.2d 298, 302 (2006). Where, as here, the plaintiff is a public figure, the complaint must also allege that the statements were made with actual malice. *Boyce & Isley, PLLC v. Cooper*, 211 N.C. App. 469, 479-80, 710 S.E.2d 309, 318 (2011). The actual malice standard is a subjective one. *Reuber v. Food Chem. News, Inc.*, 925 F.2d 703, 714 (4th Cir. 1991).

32. Courts have found defendants to be fraudulently joined where the plaintiff would not be able to establish elements of a defamation claim. *See, e.g., Minnix v. Sinclair Television Grp., Inc.*, No. 7:23-cv-091, 2023 WL 3570955, at \*1 (W.D. Va. May 19, 2023); *Rojas v. Caterpillar*, 1:06CV1024, 2008 WL 11486664 (M.D.N.C. Feb. 13, 2008).

33. As described below, there is no possibility that Robinson will be able to establish that the statements were defamatory or that they were published with actual malice.

**1. Money Did not Act with Actual Malice.**

34. First, Robinson's claim against Money necessarily fails because he cannot show

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<sup>1</sup> The only issue relevant to removal is the fraudulent joinder of Money. For the avoidance of doubt, however, as will be addressed in subsequent motion practice, the claims are also meritless against CNN.

that Money published the statements with actual malice<sup>2</sup>—*i.e.* that he knowingly made a false statement about Plaintiff or made the statement with reckless disregard for the truth. *N.Y. Times Co. v. Sullivan*, 376 U.S. 254, 279–80, 285–86 (1964); *see also Bowser v. Durham Herald Co.*, 181 N.C. App. 339, 341-42, 638 S.E.2d 614, 615-16 (2007). That is, Robinson must show that Money “*in fact* entertained serious doubts as to the truth of his publication.” *Carr v. Forbes, Inc.*, 259 F.3d 273, 283 (4th Cir. 2001) (citation omitted). He cannot.

35. The only allegations Robinson makes regarding actual malice are 1) Money bore Robinson animus and 2) his statements are “blatant fabrications.” Ex. 23 ¶ 51. Both fail to sufficiently plead actual malice.

36. First, Robinson’s claims that Money’s “extreme antipathy, ill-will, and desire to inflict harm” on Robinson are not sufficient as a matter of law to state a claim of actual malice. Ex. 23 ¶ 51. These “boil down to the claim that [Money] published the [statements] due to animus against Plaintiff,” but “[b]esides the fact that these allegations are [] conclusory, caselaw resoundingly rejects the proposition that a motive to disparage someone is evidence of actual malice.” *Nunes v. WP Co. LLC*, 513 F. Supp. 3d 1, 8 (D.D.C. 2020), *aff’d*, No. 20-7121, 2022 WL 997826 (D.C. Cir. Apr. 1, 2022) (internal quotation marks and citation omitted). As the United States Supreme Court has explained, “the actual malice standard is not satisfied merely through a showing of ill will or ‘malice’ in the ordinary sense of the term.” *Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 666 (1989); *see also Fairfax v. CBS Corp.*, 2 F.4th 286, 295 (4th Cir. 2021) (explaining that “even if” defendant “had a self-serving motive in publishing the story,”

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<sup>2</sup> Robinson, the Lieutenant Governor of North Carolina and former Republican nominee for governor, is unquestionably a public figure and therefore required to plead and prove that the statements were made with actual malice. *See, e.g., Boyce & Isley, PLLC v. Cooper*, 153 N.C. App. 25, 34, 568 S.E.2d 893, 901 (2002) (Plaintiff “certainly qualifies as a public figure due to his candidacy for public office.”).

“that does not support an inference that [defendant] seriously doubted the truth” of the allegedly defamatory statements). Accordingly, “evidence of personal hostility does not constitute evidence of ‘actual malice’ under the standard set forth in *New York Times Co. v. Sullivan*.” *Varner v. Bryan*, 113 N.C. App. 697, 704, 440 S.E.2d 295, 300 (1994).

37. This is true even if, as Robinson alleges, the statements were made to “coincide with [Plaintiff’s] election” and “derail[] the candidacy of a Republican, pro-life governor.” Ex. 23 ¶ 28. Indeed, “the motivations behind defendants’ communications—inspired by political differences or otherwise—do not impact whether defendants acted with actual malice as a matter of law.” *See Arpaio v. Zucker*, 414 F. Supp. 3d 84, 92 (D.D.C. 2019); *see also Fairfax*, 2 F.4th at 294 (rejecting that an “alleged political motivation” can support a finding of actual malice, as “self-interest and politics motivate[] many news sources; if dealing with such persons were to constitute evidence of actual malice on the part of a reporter, much newsgathering would be severely chilled.”) (internal quotation marks and citation omitted); *Reuber*, 925 F.2d at 716 (“[M]any publications set out to portray a particular viewpoint or even to advance a partisan cause. Defamation judgments do not exist to police their objectivity.”); *Dershowitz v. Cable News Network, Inc.*, 541 F. Supp. 3d 1354, 1370 (S.D. Fla. 2021) (“[A] defamation claim cannot rest on the argument that erroneous communications were motivated by differences in political opinions.”)

38. Moreover, Money’s statements in the *Assembly* Article and other public statements demonstrate that Money does not bear any ill will or malice towards Robinson. On the contrary, all of Money’s statements reflect genuine affection for Robinson. On the social media website X, above a picture of Money and Robinson, Money wrote on November 8, 2022: “It was cool running into an old friend today. We disagree on politics however you have always been cool with me.”

Ex. 7. The same day, Money also posted the picture and caption to Facebook, with the addition “[t]hat’s our L.T. Governor who still owes me money lol.” The Facebook post is included in the *Assembly* Article, in which Money expresses similar sentiments. Ex. 3 at 8. The Article states: “[Money] said he doesn’t really care about the \$25 Robinson owes him for that tape. Nor is he trying to derail the Republican’s campaign for governor. An unaffiliated voter, he said he likes Robinson as a person, if not necessarily his politics.” *Id.* at 2. Money also told *The Assembly* that “his song wasn’t meant to criticize Robinson. He called it an inside joke that I’m sharing with the world.” *Id.* at 8. On their face, these are not statements made by someone with “extreme antipathy” or a “desire to inflict harm”. And, tellingly, Money volunteered to *The Assembly* that “other former associates” and an ex-girlfriend, all of whom *he* contacted, did not remembering seeing Robinson in the adult film stores.<sup>3</sup> Any allegation of “ill-will” is undermined by this frank acknowledgement that other people don’t share his memory of Robinson—an admission that belies actual malice. *See Biro v. Conde Nast*, 963 F. Supp. 2d 255, 265 (S.D.N.Y. 2013), *aff’d* 807 F.3d 541 (2d Cir. 2015) (“[I]ncluding denials of a plaintiff rebuts [an] inference of actual malice.”).

39. Nor is there, as Robinson alleges, any “tacit[] admi[ssion]” that Money’s music video “was timed to coincide with the election and cause Lt. Gov. Robinson maximum damage[.]” Ex. 23 ¶ 28. This statement is an invention. Robinson’s allegations are premised on 1) Money’s alleged statement that “I’m glad I waited” to make the music video and 2) a meme on X that Robinson claims “suggested that his Music Video ‘saved’ young women by derailing the candidacy of a Republican, pro-life governor.” *Id.* First, it is unclear to what statement Robinson is referring. Robinson does not identify where Money allegedly said “I’m glad I waited” and it is

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<sup>3</sup> The Amended Complaint concedes that Plaintiff had been to Money’s adult film stores. Ex. 23 ¶ 15.

not included in his postings on X, the music video, or *The Assembly* article.<sup>4</sup> Second, Robinson misrepresents the meme, which originally was posted by someone—not necessarily Money—on the Trailer Park Orchestra’s X account. The meme shows a still shot from the music video below a picture of a crowd of women, one of whom is holding up the sign “Your Music Saved Me.” Money reposted the meme twice, once captioning it “hilarious” and another “Yall hilarious”. Exs. 8, 9. This is not an admission of anything, and certainly does not suggest any intention to “derail” Robinson’s campaign for governor. There is no factual evidence to support Robinson’s conclusory allegations.

40. Second, Robinson’s allegations that Money’s statements are “blatant fabrications” and that he has “actual knowledge of the falsity of his statements” (Ex. 23 ¶ 51) do not save his defamation claim. It is well-settled that such conclusory allegations are insufficient. As the North Carolina Court of Appeals has explained, these types of “conclusory averments rest, however, not on experienced or otherwise substantiated fact, but on plaintiff’s subjective assessment of defendant’s motivations.” *Dempsey v. Halford*, 183 N.C. App. 637, 641, 645 S.E.2d 201, 105 (2007) (dismissing defamation action) (internal quotation marks and citation omitted). Indeed, on a motion to dismiss, North Carolina courts are “not required . . . to accept as true allegations that are merely conclusory, unwarranted deductions of fact, or unreasonable inferences.” *Wynn v. Tyrrell Cnty. Bd. of Educ.*, 253 N.C. App. 658 (2017) (internal quotation marks and citation omitted) (finding amended complaint failed to state a defamation claim and dismissing action).

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<sup>4</sup> To the extent this quote is from a video of Money posted by Trailer Park Orchestra on September 25, 2024, available at <https://www.youtube.com/watch?v=reILQr4UzwU>, it is clear that Money’s comment is not about the music video. He begins the September 25 video by stating “glad I waited to make **this** video” and then proceeds to respond to comments Robinson recently made about Money. This “glad I waited” comment is not, as Robinson suggest, evidence that Money timed his statements “to cause Lt. Gov. Robinson maximum damage.” Ex. 23 ¶ 28.

41. Robinson has failed to plead actual malice and, therefore, there is no possibility his claim has merit against Money.

**2. Money's Statement is not Defamatory or Defamatory *Per Se*.**

42. There is also no reasonable basis to conclude that Robinson can prevail on his claim against Money because Money's statements are neither defamatory nor defamatory *per se* as a matter of law. A statement is defamatory where it "tend[s] to prejudice another in his reputation, office, trade, business or means of livelihood." *Donovan v. Fiumara*, 114 N.C. App. 524, 534, 442 S.E.2d 572, 578 (1994) (citation and quotation marks omitted).

43. Under North Carolina law, only certain types of statements are actionable as defamation *per se*: those that "(1) charge[ ] that a person has committed an infamous crime; (2) charge[ ] a person with having an infectious disease; (3) tend[ ] to impeach a person in that person's trade or profession; or (4) otherwise tend[ ] to subject one to ridicule, contempt or disgrace." *Skinner v. Reynolds*, 237 N.C. App. 150, 152, 764 S.E.2d 652, 655 (2014) (citation omitted). Only the last category is at issue here. Ex. 23 ¶ 50. Whether a statement is defamatory *per se* is a question of law. *Virginia Citizens Defense League v. Couric*, 910 F.3d 780, 784 (4th Cir. 2018) (citation omitted).

44. Robinson contends that Money's statements that Robinson owes \$25 for a "bootleg porn video[]", frequented a pornography store, purchased and watched "hundreds of bootleg porn videos", including those that were "super hardcore", are defamatory. Ex. 23 ¶¶ 8, 9, 26. But, as a matter of law, regardless of whether one finds them distasteful, neither the statements about a small debt nor the statements concerning watching pornography are defamatory.

45. It is not defamatory, let alone defamatory *per se*, to owe someone money. The Supreme Court of North Carolina expressly rejected such a claim, finding it was not libel *per se* to publish a statement that the plaintiff "is a man who will not pay his honest debts; that he will

not work and is a man that respectable people had best not have anything to do with.” *Penner v. Elliott*, 225 N.C. 33, 34, 33 S.E.2d 124, 125 (1945); *see also M. Rosenberg & Sons v. Craft*, 29 S.E.2d 375, 378 (Va. 1944) (quoting 33 Am. Jur., sec. 60) (a statement “that a person who is not a trader or merchant, or engaged in any vocation wherein credit is necessary for the proper and effectual conduct of his business, owes a debt and refuses to pay, or owes a debt which is long past due . . . does not in a legal sense necessarily expose the person of whom it is said to public hatred, contempt, or ridicule, nor does it degrade him in society, lessen him in public esteem, or lower him in the confidence of the community”).

46. Nor is it defamatory to say someone watches pornography, which is a lawful activity for adults. While some may disagree about the propriety of such conduct, the simple fact is that statements that someone engaged in a lawful activity are not defamatory. *See Lindell v. Mail Media, Inc.*, 575 F. Supp. 3d 479, 487 (S.D.N.Y. 2021) (statement that the plaintiff purchased alcohol did not have a “defamatory meaning” because doing so is a “legal and ordinary act”); *Means v. ABCABCO, Inc.*, 315 S.W.3d 209, 214 (Tex. App. 2010) (“[I]t is not defamatory to accuse a person of doing that which he has a legal right to do.”). While perhaps Robinson would prefer to maintain a more wholesome image, such a desire cannot form the basis of his defamation action. *See Ava v. NYP Holdings, Inc.*, 64 A.D.3d 407, 415-16, 888 N.Y.S.2d 247, 253-54 (1st Dep’t 2009) (holding that plaintiff had a “masturbatory fantasy” involving men and woman not susceptible of defamatory meaning).

47. Moreover, the statements are also not defamatory because “[t]he overall import of the document[s] [are] not derogatory of plaintiff.” *Nucor Corp. v. Prudential Equity Group, LLC*, 189 N.C. App. 731, 738, 659 S.E.2d 483, 487 (2008) (dismissing defamation claim where the allegedly defamatory publication “also state[d] that ‘We believe [Plaintiff] is a fine company, and

we are not aware of any ‘company-specific’ flaw or blemish.’”). The lyrics to “The Lt. Governor Owes Me Money” include “Hey, Lieutenant Governor, I’m so proud of you” and “Now you’re a wonderful Governor”. Ex. 4 at 0:30-0:33, 1:58-2:00. And the tenor of the *Assembly* Article is similarly not “derogatory”. Those interviewed, including Money, recall that Robinson was “hilarious” and “a cool dude”. Ex 3 at 6. The *Assembly* Article also reports that Money said “he likes Robinson as a person.” *Id.* at 2.

48. Because Robinson will not be able to demonstrate that Money acted with actual malice, and because the allegedly defamatory statements are not defamatory as a matter of law, there is no possibility of Robinson succeeding on his claim for defamation against Money.

**B. The Amended Complaint Cannot Cure the Original Complaint’s Violation of North Carolina Rule 8(a)(2).**

49. Finally, Robinson cannot prevail on his claim against Money because the original complaint in this action unquestionably violates Rule 8(a)(2) of the North Carolina Rules of Civil Procedure, and it was not cured by amendment.

50. Rule 8(a)(2) requires that “in all claims for punitive damages in any civil action,” as claimed here, “wherein the matter in controversy exceeds the sum or value of twenty-five thousand dollars (\$25,000), the pleading shall not state the demand for monetary relief, but shall state that the relief demanded is for damages incurred or to be incurred in excess of twenty-five thousand dollars (\$25,000).” N.C. Gen. Stat. § 1A-1, Rule 8(a)(2). In a blatant disregard for this rule, the original complaint stated that Robinson sought “no less than fifty million dollars (\$50,000,000.00).” Ex. 11. at 15.

51. Rule 8(a)(2) was enacted to “save reputations from the harm” that can result from the public learning about the amount of money demanded and “drawing their own conclusions.” *Schell v. Coleman*, 65 N.C. App. 91, 93, 308 S.E.2d 662, 664 (1983). Dismissal of a complaint

for a violation for Rule 8(a)(2) is appropriate where the violation is “flagrant and aggravated” and causes “irreparable harm” to the defendant’s reputation and ability to receive a fair trial. *Id.*

52. This is precisely the circumstance here. Following the filing of the Complaint, numerous news outlets reported on the lawsuit and the exorbitant \$50 million damages claim. On October 15, 2024, the day the Complaint was filed, Fox 8 Local News published an article “Inside NC Lt. Gov Mark Robinson’s \$50 million lawsuit against CNN, former porn clerk; ‘Dubiously sourced hit piece’”. *See* <https://myfox8.com/news/politics/nc-gov-race/inside-nc-lt-gov-mark-robinsons-50-million-lawsuit-against-cnn-former-porn-clerk-dubiously-sourced-hit-piece/>. That same day, the Raleigh News and Observer, Huffpost, and Raleigh-based North State Journal, among others, also published articles about the lawsuit with the \$50 million damages prominently featured in the headline. *See* <https://www.newsobserver.com/news/politics-government/election/article293991224.html>; [https://www.huffpost.com/entry/mark-robinson-suing-cnn-alleged-porn-site-comments\\_n\\_670e7a2fe4b094567cfe4b76](https://www.huffpost.com/entry/mark-robinson-suing-cnn-alleged-porn-site-comments_n_670e7a2fe4b094567cfe4b76); <https://nsjonline.com/article/2024/10/robinson-files-50m-defamation-lawsuit-against-cnn/>. Each article references Money and the defamation claim against him.

53. As the court explained in *Schell*, this type of “adverse publicity” and the resulting harm are the type of “evils sought to be avoided” by Rule 8(a)(2). *Schell*, 65 N.C. App. at 93, 208 S.E.2d at 664. There, soon after the plaintiff initiated the action, articles covering the lawsuit “in which specific reference was made to the amount of the claim for damage” were published. *Id.* at 94. A radio station also broadcast reports about the two-million dollar lawsuit against the defendant. *Id.* The impact of the “adverse publicity” is magnified here, where the information’s reach is not limited to the circulation of hard copy newspapers or a single radio broadcast. Any potential juror has unrestricted access to the fact that Robinson initiated a claim against Money for

\$50 million dollars.

54. While the Amended Complaint now adheres to Rule 8(a)(2)'s pleading requirement, as Money's brief in support of his motion to dismiss makes clear, no amendment can cure the damage already cause by the Complaint. Accordingly, there is no possibility that Robinson will succeed in his claim against Money because dismissal is appropriate pursuant to Rule 8(a)(2).

### **III. FEDERAL JURISDICTION**

#### **A. Diversity of Citizenship**

55. Robinson is a resident of North Carolina. CNN is not a resident of North Carolina. For the reasons set forth above, the citizenship and residency of Money should be disregarded for jurisdictional purposes.

56. Accordingly, complete diversity of citizenship existed at the time of the state court filing, and at the time of this Notice of Removal, for purposes of 28 U.S.C. § 1332.

#### **B. Amount in Controversy**

57. Robinson's Amended Complaint claims to seek "compensatory, special, and punitive damages . . . in *excess of twenty-five thousand dollars*" and "disgorgement of any and all income [Defendant CNN] ha[s] made off" the alleged statements. *See* Ex. 23 (emphasis added). Robinson, however, only limited his statement of damages in his complaint because North Carolina Rule 8(a)(2) bars him from specifically stating in his pleadings the punitive damages value he seeks to recover. *See* N.C. Gen. Stat. § 1-A1, Rule (8)(2). In fact, prior to Money filing a Motion to Dismiss Robinson's Complaint for failure to comply with Rule 8(a)(2), Robinson initially pled that the amount in controversy is "no less than fifty million dollars (\$50,000,000.00)." Ex. 11 at p. 15.

58. For purposes of determining the amount in controversy, however, federal courts generally consider allegations of “punitive damages”. *See Bell v. Preferred Life Assurance Soc’y*, 320 U.S 238, 240 (1943); *see also R.L. Jordan Oil Co. of N.C., Inc. v. Boardman Petroleum, Inc.*, 23 F. App’x 141, 145 n.3 (4th Cir. 2001).

59. Where a plaintiff alleges punitive damages “the court has subject matter jurisdiction unless it is clear beyond a legal certainty that the plaintiff would under no circumstances be entitled to recover the jurisdictional amount.” *Quality Labels & Packaging, Inc. v. Wells Fargo Bank, N.A.*, No. 1:19CV210, 2019 WL 2992219, \*7 (M.D.N.C. July 9, 2019) (citing *Cadek v. Great Lakes Dragaway, Inc.*, 58 F.3d 1209, 1211–12 (7th Cir. 1995)). Robinson asserts he “can never be fully compensated” for the damage to his personal and public life. Ex. 11 ¶ 42. While CNN disputes this claim, between the alleged \$25,000 in damages and the alleged damage to Robinson’s personal and professional reputation, which he has claimed amounts to \$50 million dollars, the amount in controversy required by 28 U.S.C. § 1332(a) has been met.

60. Because there is complete diversity of citizenship between the proper parties, and because the amount in controversy exceeds \$75,000, the Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332. Thus, CNN hereby removes Robinson’s suit to this Court pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

#### **IV. VENUE**

61. Venue is proper in this Court because this district and division encompass the Superior Court of Wake County, North Carolina the forum from which this case has been removed. *See* 28 U.S.C. § 1391.

#### **V. CONSENT**

62. This notice is filed with the consent of all Defendants.

## **VI. PROCEDURAL REQUIREMENTS**

63. In accordance with 28 U.S.C. § 1446(a) and E.D.N.C. Local Rule 5.3(a), Defendant CNN has attached a Civil Cover Sheet as Exhibit 1, Supplemental Removal Cover Sheet as Exhibit 2 and a copy of the Amended Complaint and all other process and pleadings filed to date are attached as Exhibits 10-27.

64. A copy of this Notice of Removal will be filed promptly with the Clerk of the Superior Court of Wake County, North Carolina in accordance with 28 U.S.C. § 1446(d), along with a notice of that filing. A copy of these documents will be served promptly on all parties with written notice of the same.

65. No waiver and no admission of fact, law, or liability, including without limitation the amounts of damages, if any, is intended by this Notice of Removal, and all defenses, affirmative defenses, rights and counterclaims are reserved.

FOR THE FOREGOING REASONS, the CNN removes this action to the United States District Court for the Eastern District of North Carolina.

Dated: November 14, 2024

MOORE & VAN ALLEN LLP

/s/ Mark A. Nebrig

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*Attorneys for Defendant Cable News Network*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of November, 2024, I electronically filed the foregoing Notice of Removal through the CM/ECF system and served copies of the foregoing Notice of Removal, via e-mail and first-class mail, to the following counsel:

Anthony J. Biller  
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*Counsel for Louis Love Money*

/s/ Mark A. Nebrig

Mark A. Nebrig

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:24-CV-00644**

**MARK KEITH ROBINSON,**

**Plaintiff,**

**v.**

**CABLE NEWS NETWORK, INC.,  
LOUIS LOVE MONEY,**

**Defendants.**

**INDEX OF EXHIBITS TO NOTICE OF  
REMOVAL**

<b>Exhibit</b>	<b>Description</b>
<b>Federal Cover Sheets</b>	
1	Civil Action Cover Sheet
2	Supplemental Removal Cover Sheet
<b>Exhibits in Support of Removal</b>	
3	The Assembly Article
4	Defendant Money's Music Video <sup>1</sup>
5	The CNN Article
6	Plaintiff's Press Conference <sup>2</sup>
7	Defendant Money's November 8, 2022 X Post
8	First Reposting of Meme by Defendant Money
9	Second Reposting of Meme by Defendant Money
<b>State Court Documents</b>	
10	Issued Summons
11	Complaint
12	Motion for Pro Hac Vice Admission– Jesse Binnall
13	Attorney Statement in Support of PHV – Jesse Binnall
14	Client Statement – Jesse Binnall
15	Order Permitting Out-of-State Counsel to Appear – Binnall
16	Motion for Pro Hac Vice Admission– Jason Greaves
17	Attorney Statement in Support of PHV – Jason Greaves

<sup>1</sup> In addition to a forthcoming motion seeking leave to file this exhibit manually, the following link may be used to access the exhibit: <https://www.youtube.com/watch?v=o4CbWIXGzvE>.

<sup>2</sup> In addition to a forthcoming motion seeking leave to file this exhibit manually, the following link may be used to access the exhibit: <https://www.youtube.com/watch?v=Cx8ZVzqUgB0>.

18	Client Statement – Jason Greaves
19	Order Permitting Out-of-State Counsel to Appear – Greaves
20	Certificate of Service – Orders Permitting Out-of-State Counsel to Appear
21	Defendant Money’s Motion to Dismiss
22	Brief In Support of Defendant Money’s Motion to Dismiss
23	Amended Complaint
24	Certificate of Service for Defendant CNN – Amended Complaint
25	Certificate of Service for Defendant Money – Amended Complaint
26	Plaintiff’s Motion for Extension of Time to Respond to Discovery
27	Order to Extend Time for Plaintiff to Respond to Discovery

This the 14th day of November 2024.

**MOORE & VAN ALLEN PLLC**

By: /s/ Mark A. Nebrig  
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*Attorneys for Defendant Cable News Network, Inc.*

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **INDEX OF EXHIBITS TO NOTICE OF REMOVAL** was e-filed with the Clerk of Court using the CM/ECF system. It is further certified that the foregoing was served, on this day, on all parties by United States first class mail, by depositing same in an official U.S. Postal depository, postage prepaid, and addressed to counsel as follows:

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*Counsel for Louis Love Money*

This the 14th day of November 2024.

### MOORE & VAN ALLEN PLLC

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*Attorneys for Defendant Cable News Network, Inc.*

# **EXHIBIT 1**

# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

### I. (a) PLAINTIFFS

Robinson, Mark Keith

(b) County of Residence of First Listed Plaintiff Wake County  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

See attachment.

### DEFENDANTS

Cable News Network, Inc.; Money, Louis Love

County of Residence of First Listed Defendant New Castle County  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

See attachment.

### II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

### III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |                                       |   |                            |                                       |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
|   | <b>PTF</b>                            | <b>DEF</b>                            |   | <b>PTF</b>                 | <b>DEF</b>                            |
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

### IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

### V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

### VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. §§ 1332, 1441, 1446  
Brief description of cause:  
Defamation and defamation per se removed on diversity grounds.

### VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ \_\_\_\_\_ CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes  No

### VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE 11/14/2024

SIGNATURE OF ATTORNEY OF RECORD /s/Mark A. Nebrig

### FOR OFFICE USE ONLY

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

## Attachment to Civil Cover Sheet

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# **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT  
 FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
 WESTERN DIVISION  
 No. 5:24-cv-00644

Mark Keith Robinson )  
 )  
 )  
 Plaintiff(s), )  
 )  
 )  
 v. )  
 )  
 Cable News Network, Inc., )  
 Louis Love Money )  
 )  
 )  
 Defendant(s). )

**SUPPLEMENTAL REMOVAL COVER SHEET**

**The removing party must complete this Supplemental Removal Cover Sheet and comply with Local Civil Rule 5.3. Attach separate sheets as necessary to provide complete responses.**

**Section A—Plaintiffs**

List the full name of each plaintiff from the state court action and indicate whether the plaintiff is pending (i.e., in case currently), dismissed, or otherwise terminated at the time of removal. If dismissed or terminated, indicate the date of dismissal/termination

Full Name of Plaintiff	Pending at time of removal – Yes/No?	Dismissed or terminated? Yes/No?	Date of Dismissal or Termination
Mark Keith Robinson	Yes		

**Section B—Defendants**

List the full name of each defendant from the state court action and indicate whether the defendant is pending, dismissed or otherwise terminated at the time of removal. If dismissed or terminated, indicate the date of dismissal/termination. If known, indicate if and when each defendant was served with process and whether the defendant joins in the removal.

<b>Full Name of Defendant</b>	<b>Pending at time of removal? Yes/No?</b>	<b>Dismissed or terminated? Yes/No? (If yes, state date of termination)</b>	<b>Has defendant been served with process? Yes/No/Unknown?</b>	<b>If served with process, date of service?</b>	<b>Does the defendant join in removal? Yes/No?</b>
Cable News Network, Inc.	Yes		Yes	10/15/2024	Yes
Louis Love Money	Yes		Yes	10/15/2024	Yes

**Section C—Removal pursuant to 28 U.S.C. § 1442(d)(1)**

Is only part of the state court action being removed pursuant to 28 U.S.C. § 1442(d)(1)?

Yes  No

If “Yes,” specify what portion of the state court action is being removed, and then proceed to the signature page. If “No,” proceed to Section D.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Section D—Pending State Court Motions as of Date of Removal**

Is there currently a temporary restraining order or preliminary injunction in place in this action from state court? Yes  No

List every known motion pending at the time of removal. Indicate the name of the filer, the date of filing, whether the motion has a supporting memorandum, and whether the motion is time sensitive, such as a motion for preliminary injunction.

<b>Title of Pending Motion</b>	<b>Name of Filer</b>	<b>Date of Filing</b>	<b>Memorandum-- Yes/No?</b>	<b>Time sensitive? Yes/No?</b>
Motion to Dismiss	Louis Love Money	10/16/2024	Yes	No

**Section E—Scheduled State Court Hearings as of Date of Removal**

<b>Date and Time of Hearing</b>	<b>Hearing Type</b>	<b>Assigned State Court Judge</b>
10/18/2024; 10:00 a.m.	Motion to Dismiss	TBA

Date: 11/14/2024

/s/Mark A. Nebrig  
Signature of Attorney for Removing Party or  
Unrepresented Removing Party

Printed Name Mark A. Nebrig

Law Firm Moore & Van Allen PLLC

Address 100 North Tryon Street, Suite 4700

Charlotte, NC 28202

Telephone Number 704-331-1100

Fax Number 704-331-1159

Email Address: marknebrig@mvalaw.com

State Bar No. 28710

# **EXHIBIT 3**

POLITICS

### Ex-Porn Shop Employees Say Mark Robinson Was A Regular. He Denies It.

After he embraced Christianity in the late 1980s, the GOP candidate for governor says his behavior "did not immediately reform." Six men say Robinson frequented Greensboro video-porn shops in the '90s and early 2000s.

by Jeffrey Billman and Joe Killian      September 3, 2024



Recommended For You

In his 2022 memoir, *We Are the Majority*, Lt. Gov. Mark Robinson wrote that he committed his life to Jesus in the late 1980s.

"I did not, however, experience a drastic conversion like some do," wrote Robinson, now the [Republican nominee for governor](#). "My behavior did not immediately reform. They say sin is fun for a season, and I was in that season."

Robinson didn't specify how long that season lasted or what sins it entailed. But according to Louis Money, who worked in several of Greensboro's windowless, 24-hour video-pornography stores, Robinson was a frequent customer in the 1990s and early 2000s. Money, 52, told *The Assembly* that Robinson came in as often as five nights a week to watch porn videos in a private booth.

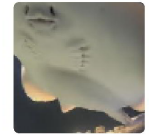
Five other men who said they were former employees or customers during this period also told *The Assembly* that Robinson visited two of these stores: Gents Video & News and I-40 Video & News.



Dog Bites Man



Mark Robinson Faces Scrutiny Over Alleged Porn Site Comments



What Is Really Going On With Charlotte's Stingray?

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In a 2022 photo, Mark Robinson speaks at the Salt & Light Conference at Charlotte's Freedom House Church. (Peyton Sickles for *The Assembly*)

In addition, Money said Robinson purchased "hundreds" of bootleg porn videos that Money sold on the side.

"He was good for at least one a week," Money said. But Money said Robinson didn't pay for the last one, which he described as a compilation of "super hardcore" films he acquired in New York City that were too risqué to be sold in North Carolina.

He said he doesn't really care about the \$25 Robinson owes him for that tape. Nor is he trying to derail the Republican's campaign for governor. An unaffiliated voter, he said he likes Robinson as a person, if not necessarily his politics.

But what he described as a "funny story" offered an opportunity for self-promotion. In mid-August, Money's band, *21st Century Band*, released a single titled "The Holy Bible of Quesadilla Money."

video, an actor in a dark suit and something approximating a Robinson mask walks into an adult video store to buy porn while Money sings, "I made you a bootleg. I did it all the time. Most of the time you paid me. I guess it, uh, slipped your mind."

Responding to a detailed list of questions, Robinson campaign spokesperson Mike Lonergan told *The Assembly* in an email that Money's claims were "bullshit" and a "complete and total fiction." He called Money and *The Assembly's* reporters "degenerates."

"This false and personal attack on my boss is complete fiction," Lonergan wrote.

Robinson was elected North Carolina's first Black lieutenant governor in 2020, two years after a fiery [gun-rights speech](#) to the Greensboro City Council made him a political celebrity. He quickly became the state's most controversial public official. Robinson's commentary often targets those who don't ascribe to his [conservative interpretation of Christianity](#) or [share his views](#) on sexuality and gender issues.



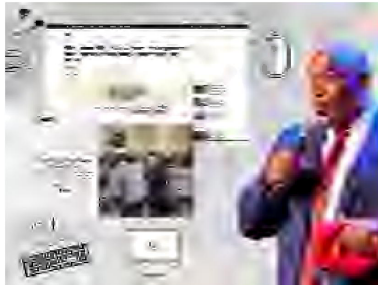
Screenshots of Money's music video.



Robinson is said to have frequented Greensboro's adult video stores during a formative period of his life. He was in his 20s and early 30s, a married father of two bouncing around restaurant and manufacturing jobs, often struggling to pay the bills. He was also, by his own account, not yet fully grounded in the Christian faith that would define his later political career.

"When I got saved, the devil doubled down in my life," he told the Bethel Free Will Baptist Church in Kinston in 2021. "[God] told me what I was supposed to do. As I was doing wrong, that voice was in the back of my head, saying, 'Stop it! Stop it! Stop it!' And I still continued in disobedience after being saved. And I'm not ashamed to say it."

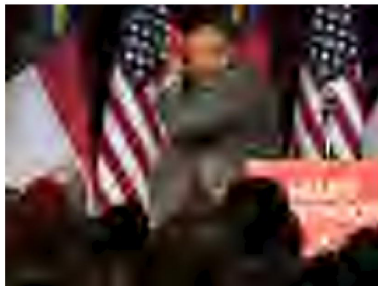
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## Mark Robinson Faces Scrutiny Over Alleged Porn Site Comments

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Amid new revelations, a growing number of Republicans are distancing themselves from Republican Mark Robinson's campaign.

September 23, 2024



## An Abiding Robinson Mystery: What's a 'Minisoldr'?

Many are wondering what the handle tied to Republican candidate Mark Robinson refers to. We attempted to figure it out.

September 24, 2024



# Mark Robinson and Why the Lieutenant Governor's Office Matters

There's a new spotlight on North Carolina's lieutenant governor, an office that usually doesn't get much attention.

September 23, 2024

## 'A Great Deal of Growing Up to Do'

Robinson, who turned 56 on August 18, was the son of an abusive alcoholic who died when he was 12. He graduated from Greensboro's Grimsley High School in 1986. He spent a semester at North Carolina A&T University but dropped out. He later wrote that he lacked the discipline to continue: "I had become far more interested in chasing pretty girls than learning anything in the classroom."

In high school, he was a member of the Junior Reserve Officers' Training Corps. He imagined himself becoming a combat soldier and obsessed over the movie *First Blood*, he wrote. After graduation, he joined the Army Reserve as a medical specialist. Later, he enlisted in the regular Army but dropped out before his enlistment began. (The Army placed him into the Individual Ready Reserve, an unpaid status that freed Robinson from drills and training.)

He wrote that he wasn't suited to military life. "I was too much of a talker and didn't want to always keep my opinions to myself."

During his semester at A&T, a friend took him to Evangel Fellowship Church, which met in the university's student union. "That's the night I got saved and formed a personal relationship with Jesus," he wrote. "I don't remember who was preaching. I don't remember much beyond the profound, life-changing experience that I felt within."

But, he added, he still "had a great deal of growing up to do."

In 1989, Robinson, then 20 or 21 years old, paid for his girlfriend Yolanda Hill's abortion. A year later, he and Hill married while she was pregnant with their first child.

"My perspective on life changed immediately upon the birth of my son," Robinson wrote. "I was the one God had given charge over this child. I had to be a responsible man."



Copies of Mark Robinson's book, *We Are The Majority*, ready for signing. (Peyton Sickles for *The Assembly*)

Robinson worked at Domino's Pizza and Sbarro early in their relationship, but he wanted to find a career. His wife's uncle helped him land a job in a furniture manufacturing business, "the first place I made enough money to support a family," he wrote.

He quit after his hours were cut, which he blamed on NAFTA, the free-trade agreement that took effect in 1994. Robinson got an \$8-an-hour part-time job at Papa Johns. He wrote that he worked his way up to a general manager position before he left to go back to college.

Between 1998 and 2003, the Robinson family filed for bankruptcy three times. During that period, Robinson also failed to file income taxes, and two of the family's cars were repossessed, according to court records and [media reports](#).

Robinson wrote in his memoir that he “was guilty of bad money management; when I had money and should have been putting it in the bank or spending it on essential things ... I was just throwing money away.”

In 2000, Robinson quit college to join his wife's daycare business. In the next few years, the Robinsons lost their house to foreclosure and sold their struggling business. He [completed his bachelor's degree](#) at UNC-Greensboro in 2022.

“My perspective on life changed immediately upon the birth of my son. I was the one God had given charge over this child. I had to be a responsible man.”

*Mark Robinson's memoir*

Robinson wrote that he embraced conservatism after reading Rush Limbaugh's book *The Way Things Ought to Be* in the late '90s. He also wrote that he began attending Guilford County Republican Party meetings during George W. Bush's 2000 presidential campaign. But he said he found the local party hidebound, so he stopped engaging.

“The party at that point didn't want to fight,” Robinson wrote. “Anybody who was a fighter had been run out of the party, and they were a bunch of milquetoast sorts who just wanted to talk about lower taxes and less government.”

Three former leaders of the Guilford GOP, including former Greensboro City Council member Tony Wilkins, told *The Assembly* they don't remember Robinson during this period—a large Black man would have stood out, they said—and were not aware of him until after his gun speech in 2018.

## ‘A Good Amount of Money’

Money said he began working at Gents Video & News in 1992, soon after he graduated from high school. He stayed in the video porn business for the next 15 years, working for and managing various Greensboro-area stores, including Gents and I-40 Video & News. (Money is, in fact, his legal name.)

These stores were notorious in Greensboro in the 1990s. Anti-pornography activists protested in parking lots, videotaping customers as they entered and holding picket signs that read, “Do your wife and children know you're here?” Police, city officials, and conservative Christian groups lobbied to close them as nuisances.

“The government tried for years to shut us down,” Money said. “The only thing that did was the internet.”

Gents didn't rent porn videos, Money said. Customers could only buy them for about \$50 or “preview” them in private booths for \$8 a pop. Robinson typically watched two or more previews in a visit, Money said.

“Every night that I worked, which would have been five nights a week, I saw Mark,” Money recalled. “He was spending a good amount of money.”



The Papa Johns on South Holden Road in Greensboro where Robinson worked in the 1990s. (Photo by Don Carrington)

This went on for several years, Money said. Robinson came in after his shifts at pizza restaurants and hung out for hours. He said Robinson's tastes were fairly standard for a straight man. Though he added, “I know he might have problems with gay people, but I don't think he has problems with lesbians.”

Robinson's campaign vehemently rejected Money's claims.

“Categorical no to all of the ridiculous allegations,” Lonergan, the Robinson spokesperson, wrote to *The Assembly*. “We said this for a few months because Money used to hang out at the Papa John's where Mark

Robinson worked in the '90s and ask for free pizza, but that's the extent of the relationship."

Lonergan also called Money a "freak show grifter" and said he had a "long history of criminal charges."

Court records show that Money has faced nine criminal charges in Guilford County since 2011. Money pleaded guilty to misdemeanor drug charges in 2018 and 2021, and prosecutors dropped felony marijuana charges in 2018 as part of a plea deal. The other cases were dismissed.

"For somebody who doesn't know who I am, they looked me up really quick," Money said of the Robinson campaign.

**"The government tried for years to shut us down. The only thing that did was the internet."**

*Louis Money*

Money admitted that he sold marijuana for two decades, though never to Robinson. He also admitted that he asked Robinson for "a free pizza here and there." But the rest of Robinson's version is "not true at all," he said.

"I think I went in that [Papa Johns] one time the whole time that I knew him," Money said. He pointed out that the Papa Johns only had takeout and delivery. "This is how you know that's bullshit, because Papa Johns aren't sit-down restaurants. There's no place to hang out in there."

Asked about Robinson's spokesperson calling him a "degenerate" and a "grifter," Money laughed. "I think I'm going to write a song called 'Freak Show Grifter,'" he said.

## 'A Regular Dude'

Lonergan criticized *The Assembly* for relying on Money's account. But five other men backed up his story.

They are all Money's longtime acquaintances, and none is inclined to vote for Robinson. But they don't appear to have political agendas. A review of state and federal databases didn't show any significant political contributions in the last decade.

Dan Livingston, who said he was a Gents customer in the mid to late 1990s, told *The Assembly* that he saw Robinson "from time to time." Livingston said Robinson usually came in with a pizza, purchased a preview, and went into a private booth to watch it and eat.

Livingston said he had "casual" conversations with Robinson but didn't get to know him that well. He didn't know of Robinson's political leanings until after he made headlines for his pro-gun speech in 2018. Livingston is not a supporter: "He's not put forth anything that I can see as constructive."

Leo Mitchell, who said he and Robinson shared a mutual acquaintance, used to stop by Gents after work. He said he saw Robinson "every now and then." Mitchell thought he was a "regular dude. He didn't really seem hyper-political."

Money had more vivid recollections. He described the future lieutenant governor as funny.

"I mean, like, *hilarious*," he said. "He would have like five or six of us up front dying laughing at 4 in the morning. Almost like a standup routine—not copying Andrew Dice Clay, but almost like doing an Andrew Dice Clay comedy bit."

Gents' backroom catered to the gay community, and Robinson's jokes often targeted the store's gay clientele, Money added. "I hate to admit this, but he was very homophobic," Money said.

Another former Gents customer, who spoke on the condition he not be named, recalled Robinson as a "jokester."

"Mark would come in," he said. "He'd bring pizza every once in a while, and he'd tell jokes and what have you, and then go look at videos."



Lt. Gov. Mark Robinson addresses the crowd at Salt & Light Conference in Charlotte.

This person said he later went to work at I-40 Video & News with Money. "And the same thing. I worked third shift over there and he'd come in late at night," he said. "Sometimes he brings a pizza and he'll go to your work."

buddy up to everybody.”

At I-40, customers could take rental movies home. Money said Robinson didn't stay there for hours on end. He would chat for a few minutes, rent a couple of movies, and return them a day or two later, Money said.

Scott Andrews said he worked at I-40 and played in a rap-rock band with Money. He said Robinson was a “pretty regular” customer in the mid to late 1990s.

“He would talk for 10, 15, 20 minutes about every time he came in there,” Andrews said. “We talked about music.”

Ken Burwell, who said he also worked at I-40, said Robinson came in “often” around 1996 and 1997. He said that he remembered Robinson because Robinson brought them free pizzas from Papa Johns even when he didn't rent videos.

“He was a cool dude,” Burwell said. “He wasn't an asshole like he is now.”

Burwell said he doesn't understand why Robinson would deny patronizing porn shops or attack Money. It happened decades ago, he said, and it wasn't illegal.

“It's not a big deal,” Burwell said. “To me, it's like, so what?”

Another person reached by *The Assembly*, Richard Wilkinson, managed I-40, according to Money. Asked about Robinson, Wilkinson said, “I'm not giving out any information about that,” and hung up. Money said Wilkinson, who currently works with him at a Greensboro sporting goods store, supports Robinson's campaign.

(Money said several other former associates from this period he contacted, including an ex-girlfriend, did not remember seeing Robinson in Gents or I-40.)

Money said he usually charged \$25 for the bootleg porn tapes he made, which typically comprised several porn movies dubbed onto a single VHS tape.

“Instead of them buying a \$50 movie for one, I would put three of them on there and sell it for \$20, \$25,” Money said. “And I did that up until about 2004—which is when Mark owed me the money.”

Money said he made that last bootleg after traveling to New York City to watch a New York Dolls [reunion concert](#). While in the Big Apple, he scored porn tapes that were too explicit to be sold in North Carolina at the time.

“So I picked it up, bought it, and just sold it to all my customers,” Money said. “Including Mark.”

Money said he usually fronted Robinson bootlegs and cashed his postdated checks later. (“I totally wish the bank still had copies of the checks,” Money said.) But Robinson never paid for the last one, he said. And after that, Robinson stopped coming into I-40 Video & News.

That wasn't unusual. Business dried up as internet porn became ubiquitous, and many stores—including Gents and I-40—eventually closed.

## ‘A Steady Diet of Communism and Pornography’

In 1973, the U.S. Supreme Court [ruled](#) that adult pornography was protected by the First Amendment so long as it had “serious literary, artistic, political, or scientific value.” But in recent years, some members of Donald Trump's Make America Great Again movement have pushed again to crack down on what they view as obscenity.

Porn “has no claim to First Amendment protection” and “should be outlawed,” declared [Project 2025](#), the Heritage Foundation's blueprint for a second Trump administration. “The people who produce and distribute it should be imprisoned.” (Trump has tried to distance himself from Project 2025, though many of its architects [worked for him](#).)

Robinson does not appear to have taken a position on whether porn should be legal. And it's not clear whether he took a public position on a [bill](#) the General Assembly passed in 2023 that required online porn sites to verify that users are at least 18 years old. A porn industry spokesman called it “backdoor censorship.” In response, Pornhub [blocked](#) North Carolina users on January 1.



A former video porn shop Robinson allegedly frequented at 3722 W. Gate City Blvd. is now an auto shop. (Photo by Don Carrington)

But Robinson has used the word “pornography” to describe everything from music and network television to [LGBTQ-themed children’s books](#). During this year’s N.C. Republican Party Convention, for example, Robinson called public school teachers and administrators “all-powerful bureaucrats ... who believe it’s OK to feed your children a steady diet of communism and pornography.”

Rhetoric like this fueled Robinson’s rapid ascent in state politics. For the men who say they knew him from his porn-shop days, it was jarring to watch Robinson become a national political figure.

“That’s what’s so shocking—he’s nothing like that today,” said Andrews, who said he worked in I-40 Video & News. “It’s like he’s embarrassed of who he used to be or whatever. I spent years as a Christian, too, but I didn’t run for office and get in pulpits and shout about all the craziness I used to do and yell at people for it. Because that’s pretty much what he’s done.”

But while the culture wars propelled Robinson to an easy victory in this year’s Republican primary for governor, it’s unclear how well that will translate to the general election’s broader audience. Robinson has [moderated his position on abortion](#) and sought to highlight his [working-class background](#), but he has struggled to shake a long record of [conspiratorial statements](#) and hostile comments toward [women, gays, and Jewish people](#).

**“It’s like he’s embarrassed of who he used to be or whatever. I spent years as a Christian, too, but I didn’t run for office and get in pulpits and shout about all the craziness I used to do and yell at people for it.”**

*Scott Andrews, former I-40 employee*

More recently, his campaign has been buffeted by a controversy involving his wife’s now-closed nonprofit, [Balanced Nutrition](#). The state Department of Health and Human Services says it must repay [\\$132,000](#) in federal funds, in part for filing for reimbursements for payments the nonprofit did not make. (Balanced Nutrition asked the DHHS for an “informal conference” to dispute the allegations. As of August 27, the conference had not been scheduled, according to a DHHS spokesperson.)

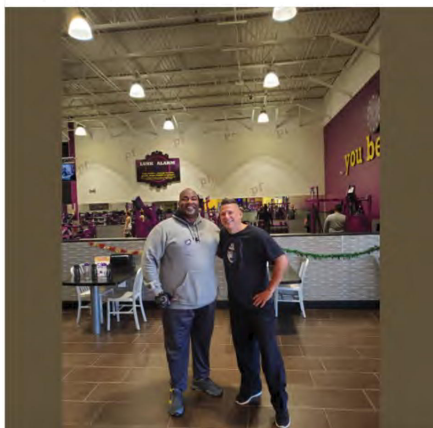
Robinson heads into Labor Day [trailing](#) Attorney General Josh Stein, the Democratic nominee for governor, by [double digits](#) in some polls.

## ‘We Have Always Been Cool’

The morning of the November 2022 election, Money said he was working out at a Planet Fitness in High Point when he heard a loud voice bellow, “Louis!”

“I was like, who the hell knows me in High Point?” he said.

 **Louis Money**  
November 8, 2022 · 45  
I disagree politically with this guy. However we have always been cool. That's our Lt. Governor who still owes me money lol



Money’s Facebook post.

It was Robinson. They hadn’t seen each other in at least a decade, he said. They talked for about 20 minutes.

“I was like, ‘Dude, I’m so proud of you, man,’” Money recalled. “I disagree with you. But I’m proud of what you accomplished for yourself.”

Money said he chided Robinson over the \$25 he says he was owed for the bootleg porn tape. “I was like, ‘I’m so glad that you didn’t pay me,’” Money said. “I tell everybody in the world that, you know, the lieutenant governor owes me money, so I don’t even want your money anymore.”

He said Robinson laughed.

“I was like, ‘Man, I can’t wait to do a song about it,’” Money said. “He didn’t chuckle with that one.”

He posted a photo of himself and Robinson on X, formerly Twitter, and on his Facebook page, which is private: “I disagree politically with this guy. However we have always been cool,” he wrote on Facebook. “That’s our Lt. Governor who still owes me money LOL.”

Money told *The Assembly* that his song wasn’t meant to criticize Robinson. He called it an “inside joke that I’m sharing with the world.”

“I don’t know if he still watches porn,” he said. “You know, people change in 20 years.”

*Don Carrington and Tim Funk contributed reporting for this article.*

*Jeffrey Billman reports on politics and the law for The Assembly. Email him at [jeffrey@theassemblync.com](mailto:jeffrey@theassemblync.com).*

[More by this author](#)

*Joe Killian is The Assembly’s Greensboro editor. He joined us from NC Newsline, where he was senior investigative reporter.*

[More by this author](#)

# **EXHIBIT 4**

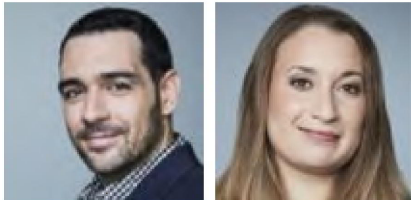
Exhibit 4 is a video exhibit of Defendant Money's music video and is the subject of Defendant CNN's forthcoming Motion for Leave to File Manually.

# **EXHIBIT 5**

HAPPENING NOW  
Trump speaks in North Carolina on the final day of his campaign. Watch CNN

KFILE

# 'I'm a black NAZI!': NC GOP nominee for governor made dozens of disturbing comments on porn forum

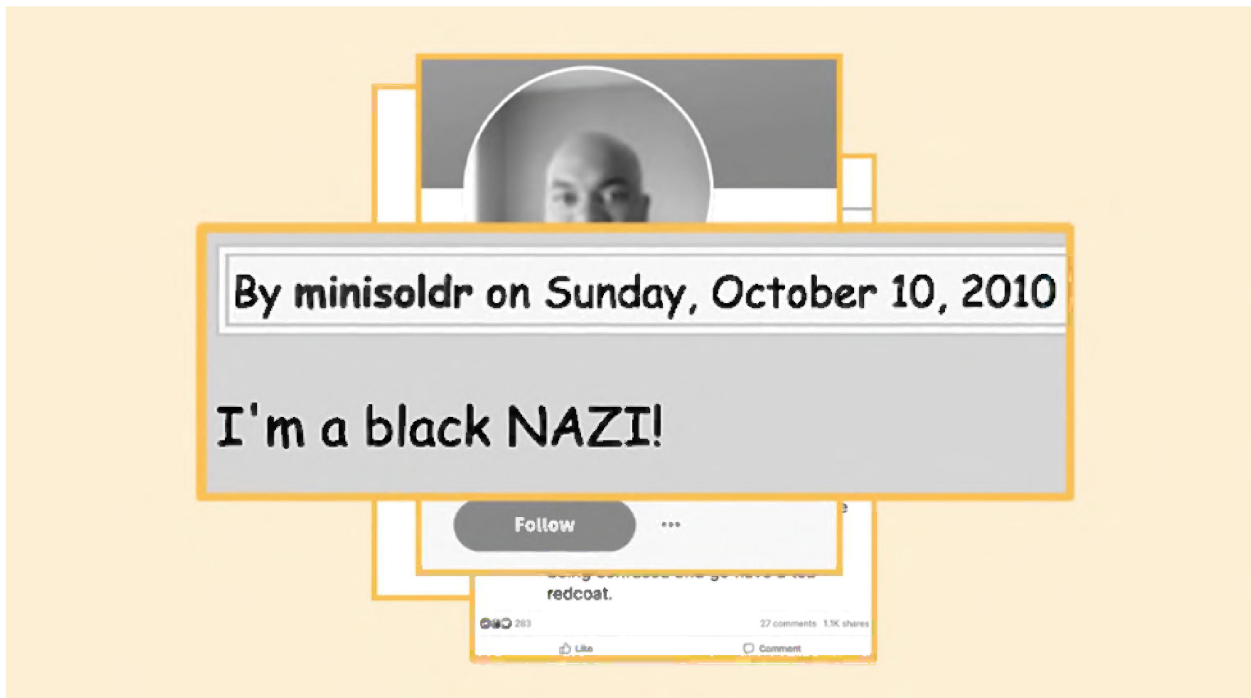


By [Andrew Kaczynski](#) and [Em Steck](#), CNN

9 minute read

Published 3:21 PM EDT, Thu September 19, 2024

Animation by Patrick Gallagher/CNN



*Editor's Note: This story contains offensive language.*

**(CNN)** — Mark Robinson, the controversial and socially conservative Republican nominee for governor of North Carolina, made a series of inflammatory comments on a pornography website's message board more

than a decade ago, in which he referred to himself as a “black NAZI!” and expressed support for reinstating slavery, a CNN KFile investigation found.

Despite a recent history of anti-transgender rhetoric, Robinson said he enjoyed watching transgender pornography, a review of archived messages found in which he also referred to himself as a “perv.”

The comments, which Robinson denies making, predate his entry into politics and current stint as North Carolina’s lieutenant governor. They were made under a username that CNN was able to identify as Robinson by matching a litany of biographical details and a shared email address between the two.

Many of Robinson’s comments were gratuitously sexual and lewd in nature. They were made between 2008 and 2012 on “Nude Africa,” a pornographic website that includes a message board. The comments were made under the username minisoldr, a moniker Robinson used frequently online.

Robinson listed his full name on his profile for Nude Africa, as well as an email address he used on numerous websites across the internet for decades.

CNN is reporting only a small portion of Robinson’s comments on the website given their graphic nature.

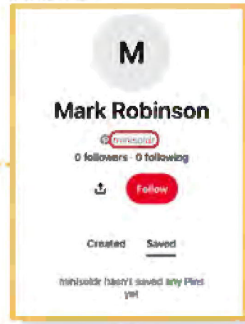
**Screenshots show Robinson used 'minisoldr' all over the internet**

North Carolina Lt. Gov. Mark Robinson used the same alias and email he used on Nude Africa across several social media platforms — though many of these accounts haven't been active in years.

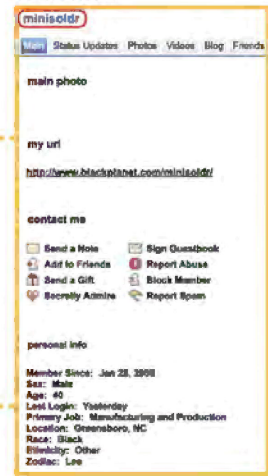
**Facebook post shows previous Twitter handle**



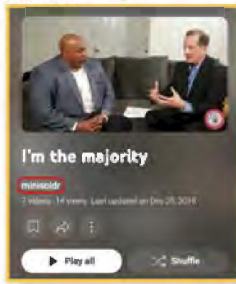
**Pinterest**



**BlackPlanet**



**YouTube**



**Disqus**



Note: This graphic only includes select examples.

Sources: BlackPlanet, Disqus, Facebook, Pinterest, YouTube  
Graphic: CNN

Many of Robinson’s comments on Nude Africa stand in contrast to his public stances on issues such as abortion and transgender rights.

Publicly, Robinson has fiercely argued that people should use bathrooms only that correspond to the gender they were assigned at birth. He’s also said transgender women should be arrested for using women’s restrooms.

“If you’re a man on Friday night, and all the sudden Saturday, you feel like a woman, and you want to go in the women’s bathroom in the mall, you will be arrested, or whatever we gotta do to you,” [Robinson said](#) at a campaign rally in February 2024. “We’re going to protect our women.”

Yet privately under the username minisoldr on Nude Africa, Robinson graphically described his own sexual arousal as an adult from the memory of secretly “peeping” on women in public gym showers as a 14-year-old. Robinson recounted the story as a memory he said he still fantasized about.

“I came to a spot that was a dead end but had two big vent covers over it! It just so happened it overlooked the showers! I sat there for about an hour and watched as several girls came in and showered,” Robinson wrote on Nude Africa.

CNN is not publishing the graphic sexual details of Robinson’s story.

“I went peeping again the next morning,” Robinson wrote. “but after that I went back the ladder was locked! So those two times where [sic] the only times I got to do it! Ahhhhh memories!!!!”

In other comments on Nude Africa, Robinson discussed his affinity for transgender pornography.

“I like watching tranny on girl porn! That’s f\*cking hot! It takes the man out while leaving the man in!” Robinson wrote. “And yeah I’m a ‘perv’ too!”

In an interview with CNN on Thursday, Robinson repeatedly denied that he made the comments on Nude Africa.

“This is not us. These are not our words. And this is not anything that is characteristic of me,” Robinson said. Presented with the litany of evidence connecting him with the minisoldr user name on Nude Africa, Robinson said, “I’m not going to get into the minutia of how somebody manufactured this, these salacious tabloid lies.”

CNN first reached out to Robinson Tuesday morning with evidence connecting him to the comments on Nude Africa. It took his campaign two days to respond and issue a denial.

During his interview with CNN, Robinson repeatedly said the issues that faced North Carolinians were more important than what he called “tabloid trash,” and he steered the conversation toward attacking his opponent in the race, Democrat Josh Stein, the state’s attorney general.

“We are not getting out of this race. There are people who are counting on us to win this race,” Robinson said.

## **A history of controversial statements**

Campaigning for lieutenant governor in 2020, Robinson advocated [for a complete abortion ban](#) without exceptions. He [later expressed regret](#) in 2022 for paying for his now-wife to have an abortion in the 1980s.



Video Ad Feedback

Rising GOP star running for NC governor mocked Parkland shooting survivors

03:24 - Source: [CNN](#)

Now campaigning for governor, [he says he supports](#) a so-called “heartbeat” bill that would ban abortion when a heartbeat is detected – approximately six weeks – with exceptions for rape, incest and health of the mother.

But writing as minisoldr on Nude Africa in December 2010, Robinson said he did not care about a celebrity having an abortion.

“I don’t care. I just wanna see the sex tape!” Robinson wrote.

In another thread, commenters considered whether to believe the story of a woman who said she was raped by her taxi driver while intoxicated. In response, Robinson wrote, “and the moral of this story..... Don’t f\*\*k a white b\*tch!”

Robinson, who would become North Carolina’s first Black governor if elected, also repeatedly maligned civil rights leader Martin Luther King Jr., attacking him in such intense terms that a user accused him of being a white supremacist.

“Get that f\*cking commie bastard off the National Mall!” Robinson wrote about the dedication of the memorial to King in Washington, DC, by then-President Barack Obama.

“I’m not in the KKK. They don’t let blacks join. If I was in the KKK I would have called him Martin Lucifer Koon!” Robinson responded.

CNN's reporting on Robinson's comments comes a few weeks after The Assembly, a North Carolina digital publication, [reported](#) that Robinson frequented local video pornography shops in the 1990s and 2000s. The story cited six people who interacted and saw him frequent the stores in Greensboro, North Carolina. A spokesperson for Robinson called the story false and a "complete fiction."

Despite earning the full endorsement of former President Donald Trump and the North Carolina Republican Party, Robinson faces an uphill battle in the race for governor against Stein.

Robinson's history of controversial remarks, including [mocking school shooting survivors](#), his [past support for total abortion bans without exceptions for rape or incest](#) and [disparaging the civil rights movement](#) have been a consistent theme in the race. Recent public [polling shows](#) Robinson is losing to Stein.

## Identifying minisoldr as Robinson



Video Ad Feedback

North Carolina GOP nominee for governor responds to CNN report about his disturbing comments on porn forum

03:03 - Source: [CNN](#)

On the Nude Africa website in both comments and his profile, minisoldr offered numerous details that align precisely with Robinson's personal history.

In his profile, minisoldr listed his full name as "mark robinson" and disclosed a private email address Robinson used elsewhere online. In 2012, a user responded to a comment by calling minisoldr "Mark."

Minisoldr mentioned in 2008 being married for 18 years, which corresponds with Robinson's marriage to Yolanda Hill in 1990. In 2011, minisoldr wrote he had been married 21 years. Minisoldr wrote in a 2011 post that he lived in Greensboro, North Carolina, the same town where Robinson lived at the time and currently lives.

### **Biographical data shared by 'minisoldr' online lines up with Robinson's details**

Information shared by the alias 'minisoldr' on Nude Africa and AdultFriendFinder correlates with publicly available biographical data for North Carolina Lt. Gov. Mark Robinson

Location

Nude Africa

By minisoldr on Thursday, April 14, 2011 - 5:26 pm:

I'm in Greensboro and if you

X (formerly Twitter)



**Mark Robinson**   
@markrobinsonNC

Husband, Father, Grandfather, American Patriot. 35th Lieutenant Governor of the Great State of North Carolina. Candidate for Governor.

 Greensboro, NC  markrobinsonfornc.com  
 Born August 18, 1968  Joined January 2011

AdultFriendFinder

Information

56 / Male

Greensboro, North Carolina United States

Age

AdultFriendFinder

rm\_minisoldr101 56 / M

"Looking to get away from "life""

Birthdate:	August 18, 1968
Marital Status:	Married
Height:	6 ft 0 in / 182-185 cm
Body Type:	BBM

X



**Mark Robinson**   
@markrobinsonNC

Husband, Father, Grandfather, American Patriot. 35th Lieutenant Governor of the Great State of North Carolina. Candidate for Governor.

 Greensboro, NC  markrobinsonfornc.com  
 Born August 18, 1968  Joined January 2011

Marriage

Nude Africa

By minisoldr on Friday, September 16, 2011 - 10:40 am:

Married 21 years! Happily with no bullshit or beggin' for 21 years!

Facebook



**Mark Keith Robinson**  
May 5, 2014 · 

May 5, 1990 I married the person God made just for me. 24 years and counting with the best friend, wife, and mother ever. Happy anniversary baby. I love you!!!! #lookatthosesmiles!!!!

Note: CNN has censored some graphic language and slurs. This graphic only includes select examples.

Sources: AdultFriendFinder, Facebook, Nude Africa, X

Graphic: CNN

In a post in 2012, minisoldr said he served in the Army in the 1980s, during the same time period as Robinson. In his sexually graphic comments detailing watching women in the showers in 2011, minisoldr wrote that his mother worked at an Historically Black College and University (HBCU). Robinson's mother worked as a custodian at North Carolina A&T State University, an HBCU located in Greensboro.

Both minisoldr and Robinson often posted about the same topics online, including reviews for remote-controlled helicopters, their attraction to specific celebrities and their favorite "Twilight Zone" episode.

The email address associated with minisoldr on Nude Africa was also used by Robinson elsewhere online and social media. On the commenting platform Disqus, [a user who joined](#) in April 2011 features Mark Robinson's photo under the username minisoldr.

Usernames and email addresses from Disqus were publicly leaked online in 2017, [according](#) to the company. CNN confirmed that Robinson's username minisoldr on Disqus shared the same email address as the one used on Nude Africa.

Robinson's Disqus page is also linked to the Black social networking site Black Planet. The [Web Archive shows](#) a user named "minisoldr" described themselves as 40 years old in February 2009 – the same age as Robinson at the time – and living in Greensboro, North Carolina – Robinson's hometown.

## **A username often used by Robinson**

Robinson has frequently used the username "minisoldr" elsewhere on the internet. On X, the platform formerly known as Twitter, Robinson once used the minisoldr username, according to a screenshot he [shared on Facebook](#) in 2018 and [data](#) in [Robinson's old tweets](#).

A YouTube [playlist for a user](#) named "minisoldr" features exclusively videos of Robinson. On [Pinterest](#), a user "minisoldr" lists his name as "Mark Robinson."

The "minisoldr" username has also posted reviews of products and places Robinson has also publicly recommended. On Amazon, a user named "minisoldr" reviewed products [frequently shared](#) by Robinson on Facebook, including remote-controlled helicopters. And the same email address and username used on Nude Africa also left reviews on Google for two local businesses Robinson later posted on Facebook that he used.

Robinson's unique choice of language further links him to the "minisoldr" alias on the pornographic forums. Uncommon phrases such as "gag a maggot," "dunder head," "I don't give a frogs a\*\*," and "I don't give two shakes of it" were used both by minisoldr on Nude Africa and by Robinson on his personal Facebook page.

### Uncommon phrases used by 'minisoldr' and Robinson

Here are several examples of unique phrases used by both 'minisoldr' on Nude Africa and by North Carolina Lt. Gov. Mark Robinson on his personal Facebook page.

"frogs fat ass/behind"

<p><b>Nude Africa</b></p> <div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p>By <b>minisoldr</b> on Monday, April 25, 2011 - 6:38 pm:</p> <p>I don't give a <b>frogs fat ass</b> where that vid came from</p> </div>	<p style="text-align: center;"><b>Facebook</b></p> <div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9; margin-bottom: 10px;"> <p><b>Mark Keith Robinson</b> October 3, 2014</p> <p>Note to the news media; I don't give <b>frogs fat ass</b> about Bill Cosby, Mike Brown, Mike Browns' mamas baby daddy, Ray Rice, or that heffer who talked smack about Obamas kids.</p> </div> <div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p><b>Mark Keith Robinson</b> January 3, 2017</p> <p>I really don't give a <b>frogs fat behind</b> who Serena Williams married.</p> </div>
---	--

---

"don't give two shakes"

<div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p>By <b>minisoldr</b> on Friday, December 30, 2011 - 4:54 pm:</p> <p>I <b>don't give two shakes</b> of my black ass about dem Mexicans kicking the shit outta them damn turkeys!!! Just kill 'em, clean 'em and get them mo-fo's on the truck so they can be at the store by T'giving!</p> </div>	<div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p><b>Mark Keith Robinson</b> August 17, 2016</p> <p>Dear Bob Costas, We <b>don't give two shakes</b> of our behinds about that yellow haired swimmer getting "robbed." Please talk about the games our go sit your messy self down somewhere. Sincerely, SPORTS FANS</p> </div>
---	---

---

"gag a maggot"

<div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p>By <b>minisoldr</b> on Sunday, October 16, 2011 - 4:50 pm:</p> <p><b>Gag a maggot!</b> Get that commie bastard off the National Mall!</p> </div>	<div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p><b>Mark Keith Robinson</b> April 22, 2017</p> <p>Facebook needs to do something about these "Whore Profiles." Craigslist ousted them, Facebook can do it. <b>#gagamaggot</b></p> </div>
--	---

---

"dunder head"

<div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p>By <b>minisoldr</b> on Monday, December 27, 2010 - 8:04 pm:</p> <p>Butter-fly McQueen don't no nuthin' bout no religin! Nuthin! Taking your q's from a Hollywood <b>dunder head</b> is a good way to end up sfoasopid!</p> </div>	<div style="border: 1px solid gray; padding: 5px; background-color: #f9f9f9;"> <p><b>Mark Keith Robinson</b> August 6, 2016</p> <p>Hitting an uneducated, pop culture <b>dunder head</b> with the truth is like throwing scalding water on a dog.</p> </div>
---	--

Note: CNN has censored some graphic language and slurs. This graphic only includes select examples.

Sources: Facebook, Nude Africa  
Graphic: CNN

## **Robinson as minisoldr ‘Slavery is not bad’**

In the pornographic forums, Robinson revealed his unvarnished thoughts on issues such as race, gender and abortion.

Writing in a forum discussing Black Republicans in October 2010, Robinson stated unprovoked: “I’m a black NAZI!”

That same month, Robinson wrote in another post that he supported the return of slavery.

“Slavery is not bad. Some people need to be slaves. I wish they would bring it (slavery) back. I would certainly buy a few,” he wrote.

In March 2012, Robinson wrote that he preferred the former leader of Nazi Germany Adolf Hitler over the leadership in Washington during the administration of Barack Obama.

“I’d take Hitler over any of the sh\*t that’s in Washington right now!” he wrote.

Robinson’s comments on Nude Africa often frequently contained derogatory and racial slurs directed at Black, Jewish and Muslim people.

In a series of seven posts in October 2011, Robinson disparaged Martin Luther King in such intense terms, calling him a “commie bastard,” “worse than a maggot,” a “ho f\*\*king, phony,” and a “huckster,” that a user in the thread accused him of being in the KKK. Robinson responded by directing a slur at King.

In October 2010, Robinson used the antisemitic slur “hebe” when discussing how he liked the show “Good Times” developed by Norman Lear, saying “the show itself was a bunch of heb [sic] written liberal bullshit!”

While discussing the Taliban, he referred to Muslims as “little rag-headed bastards” and said that “if Muslims took over liberals would be the 1st ones to be beheaded!”

Robinson also used homophobic slurs frequently, calling other users f\*gs.

In a largely positive forum discussion featuring a photo of two men kissing after one returned from a military deployment, Robinson wrote the sole negative comment.

“That’s sum ole sick a\*\* f\*ggot bullsh\*t!” he wrote.



2024 Elections

US

Crime & Justice

World

Africa  
Americas  
Asia  
Australia  
China  
Europe  
India  
Middle East  
United Kingdom

Politics

SCOTUS  
Congress  
Facts First  
2024 Elections

Business

Tech  
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Calculators  
Videos

Markets

Pre markets  
After Hours  
Fear & Greed  
Investing  
Markets Now  
Nightcap

Health

Life, But Better  
Fitness  
Food  
Sleep  
Mindfulness  
Relationships

Entertainment

Movies  
Television  
Celebrity

Tech

Innovate  
Foreseeable Future  
Mission: Ahead  
Work Transformed  
Innovative Cities

Style

Arts  
Design  
Fashion  
Architecture  
Luxury  
Beauty  
Video

Travel

Destinations  
Food & Drink  
Stay  
News  
Videos

Sports

Pro Football  
College Football  
Basketball  
Baseball  
Soccer  
Olympics  
Hockey

Watch

Live TV  
CNN Headlines  
CNN Shorts  
Shows A-Z  
CNN10  
CNN Max  
CNN TV Schedules  
HASHXXXS

Listen

CNN 5 Things  
Chasing Life with Dr. Sanjay Gupta  
The Assignment with Audie Cornish  
One Thing  
Top of War  
CNN Political Briefing  
The Axe Files  
All There Is with Anderson Cooper  
All CNN Audio podcasts

CNN Underscored

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Reviews  
Deals  
Money  
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Solutions  
Weather

Weather

Video  
Climate

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# **EXHIBIT 6**

Exhibit 6 is a video exhibit of Plaintiff's press conference and is the subject of Defendant CNN's forthcoming Motion for Leave to File Manually.

# **EXHIBIT 7**

- X
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- Notifications
- Messages
- Grok
- Lists
- Bookmarks
- Jobs
- Communities
- Premium
- Verified Orgs
- Profile
- More

Post Reply

Search

**louis money** @LouisLMoney  
 It was cool running into an old friend today. We disagree on politics however you have always been cool with me.  
 @markrobinsonNC



2:30 PM · Nov 8, 2022 from High Point, NC

22 23 100 10

Post your reply Reply

**sweetermansdan** @kabongodan99 · Sep 20  
 Lmfao  
 1 468



**DaWrTrem** @JamesTremaine2

Relevant people

**louis money** @LouisLMoney Follow  
 Lead singer for The Trailer Park Orchestra and probably the most famous former porn clerk in the world!

What's happening

- The Offseason** LIVE  
 Politics · Trending  
**Trump and Biden**  
 115K posts
  - Business and Finance · Trending  
**#stockmarketcrash**  
 17.4K posts
  - Entertainment · Trending  
**Uncle Joey**  
 Trending with Dave Coulier, Full House
  - Trending in United States  
**DOGE**  
 628K posts
- Show more

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# **EXHIBIT 8**

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- Lists
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- Communities
- Premium
- Verified Orgs
- Profile
- More

← Post Reply

**louis money**  
@LouisLMoney

Hilarious



10:25 AM · Sep 30, 2024 · 380 Views

- Retweet
- Like
- Bookmark
- Share

Post your reply Reply

**DaWrTrem**  
@JamesTremaine2

Search

Relevant people

**louis money**  
@LouisLMoney Follow

Lead singer for The Trailer Park Orchestra and probably the most famous former porn clerk in the world!

**Trailer Park Orchest**  
@tpobaridnc Follow

Official Twitter account for the Trailer Park Orchestra.

What's happening

**The Offseason**  
LIVE

Trending in United States

**#ScriptTV**  
Trending with #ScriptNetwork \$SCRIPT 2,068 posts

Trending in United States

**MKBHD**  
3,854 posts

Entertainment Trending

**Glen Powell**  
Trending with People Magazine 5,377 posts

Entertainment Trending

**Skai Jackson**  
12,176 posts

Show more

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# **EXHIBIT 9**

- X
- Home
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- Grok
- Lists
- Bookmarks
- Jobs
- Communities
- Premium
- Verified Orgs
- Profile
- More

Post Reply

**louis money**  
@LouisLMoney

Y'all are hilarious



10:08 AM · Sep 30, 2024 · 312 Views

- Retweet
- Like
- Bookmark
- Share

Post your reply Reply

**DaWrTrem**  
@JamesTremaine2

Search

Relevant people

- louis money** @LouisLMoney Follow  
Lead singer for The Trailer Park Orchestra and probably the most famous former porn clerk in the world!
- Trailer Park Orchest** @tpobaridnc Follow  
Official Twitter account for the Trailer Park Orchestra.

What's happening

- The Offseason** LIVE  
Music · Trending  
**Sexiest Man Alive**  
62.1K posts
- Politics · Trending  
**Ambassador to Israel**  
51.6K posts
- Trending in United States  
**LAPD**  
8.023 posts
- Entertainment · Trending  
**Skai Jackson**  
12K posts

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# **EXHIBIT 10**

STATE OF NORTH CAROLINA

File No.

24CV032897-910

Wake County

In The General Court Of Justice
District Superior Court Division

Name Of Plaintiff: Mark Keith Robinson
Address: Envisage Law, 2601 Oberlin Rd., Suite 100
City, State, Zip: Raleigh NC 27608
VERSUS
Name Of Defendant(s): Cable News Network, Inc. and Louis Love Money

CIVIL SUMMONS
ALIAS AND PLURIES SUMMONS (ASSESS FEE)
G.S. 1A-1, Rules 3 and 4
Date Original Summons Issued
Date(s) Subsequent Summons(es) Issued

To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1: Cable News Network, Inc.
c/o Reg Agent CT Corporation System
160 Mine Lake Ct., Suite 200
Raleigh NC 27615

Name And Address Of Defendant 2: Louis Love Money
1510 19th St
Greensboro NC 27405



IMPORTANT! You have been sued! These papers are legal documents, DO NOT throw these papers out!
You have to respond within 30 days. You may want to talk with a lawyer about your case as soon as possible, and, if needed, speak with someone who reads English and can translate these papers!
¡IMPORTANTE! ¡Se ha entablado un proceso civil en su contra! Estos papeles son documentos legales. ¡NO TIRE estos papeles!
Tiene que contestar a más tardar en 30 días. ¡Puede querer consultar con un abogado lo antes posible acerca de su caso y, de ser necesario, hablar con alguien que lea inglés y que pueda traducir estos documentos!

A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

- 1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and
2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of Plaintiff's Attorney (if none, Address Of Plaintiff): Anthony J. Biller
Envisage Law
2601 Oberlin Rd., Suite 100
Raleigh NC 27608

Date Issued: 10/15/2024
Time: 9:46:11 am
Signature: TW
Deputy CSC Assistant CSC Clerk Of Superior Court

ENDORSEMENT (ASSESS FEE)
This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement
Time
Signature
Deputy CSC Assistant CSC Clerk Of Superior Court

NOTE TO PARTIES: Many counties have MANDATORY ARBITRATION programs in which most cases where the amount in controversy is \$25,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.

(Over)

**RETURN OF SERVICE**

I certify that this Summons and a copy of the complaint were received and served as follows:

**DEFENDANT 1**

<i>Date Served</i>	<i>Time Served</i> <input type="checkbox"/> AM <input type="checkbox"/> PM	<i>Name Of Defendant</i>
--------------------	---	--------------------------

- By delivering to the defendant named above a copy of the summons and complaint.
- By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

*Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)*

<input type="checkbox"/> Acceptance of service. Summons and complaint received by: <input type="checkbox"/> Defendant 1. <input type="checkbox"/> Other: <small>(type or print name)</small>	<i>Date Accepted</i>	<i>Signature</i>
--	----------------------	------------------

Other manner of service *(specify)*

Defendant WAS NOT served for the following reason:

**DEFENDANT 2**

<i>Date Served</i>	<i>Time Served</i> <input type="checkbox"/> AM <input type="checkbox"/> PM	<i>Name Of Defendant</i>
--------------------	---	--------------------------

- By delivering to the defendant named above a copy of the summons and complaint.
- By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

*Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)*

<input type="checkbox"/> Acceptance of service. Summons and complaint received by: <input type="checkbox"/> Defendant 2. <input type="checkbox"/> Other: <small>(type or print name)</small>	<i>Date Accepted</i>	<i>Signature</i>
--	----------------------	------------------

Other manner of service *(specify)*

Defendant WAS NOT served for the following reason:

<i>Service Fee Paid</i> \$	<i>Signature Of Deputy Sheriff Making Return</i>
-------------------------------	--

<i>Date Received</i>	<i>Name Of Sheriff (type or print)</i>
----------------------	--

<i>Date Of Return</i>	<i>County Of Sheriff</i>
-----------------------	--------------------------

# **EXHIBIT 11**

NORTH CAROLINA  
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

24 CVS \_\_\_\_\_

MARK KEITH ROBINSON, )  
 )  
 *Plaintiff,* )  
 )  
 v. )  
 )  
 CABLE NEWS NETWORK, INC., )  
 )  
 LOUIS LOVE MONEY, )  
 )  
 *Defendants.* )  
 \_\_\_\_\_ )

COMPLAINT

Demand for a Jury Trial

1. CNN and Louis Love Money are responsible for a new low in digital lynching. In a malicious hit job so well timed as to be *uncanny*, they have published disgusting lies about Lieutenant Governor Mark Robinson in what appears to be a coordinated attack aimed at derailing his campaign for governor, and has already inflicted immeasurable harm to his family, his reputation, and his good name. This lawsuit, while utterly insufficient to right this wrong, shall serve as a small measure of accountability.

Parties

2. Lieutenant Governor Mark Keith Robinson (“Lt. Gov. Robinson”) is an individual who is a resident and citizen of North Carolina and maintains his office at the Hawkins-Hartness House at 310 North Blount Street, Raleigh for his work as the

Lieutenant Governor. He is the first black man to hold that title in North Carolina and is the Republican candidate for governor of North Carolina.

3. Defendant Cable News Network, Inc. (“CNN”) is a Delaware corporation, with its headquarters in Georgia. CNN purports itself to be “The Most Trusted Name in News” and is one of the world’s most well-recognized media companies. CNN’s broad network of television, website, social media accounts, and digital networks reaches millions of people in North Carolina. CNN has a bureau in Charlotte, North Carolina, is registered with the North Carolina Secretary of State as a foreign corporation authorized to do business in North Carolina, and maintains a registered agent in Raleigh, North Carolina.

4. Defendant Louis Love Money (“Money”) is an individual who is a resident and citizen of North Carolina and resides in Guilford County. He is 52 years old, sings in a local punk rock band called Trailer Park Orchestra, and appears to have changed his name from Louis Alen Wooten.

#### **Jurisdiction & Venue**

5. This Court has subject matter jurisdiction over this cause of action pursuant to North Carolina General Statutes § 1-75.4.

6. This Court has personal jurisdiction because Defendants transmitted their statements into North Carolina, relied on North Carolina sources, the statements, evidenced by their focus on the current Lieutenant Governor of North Carolina and candidate for Governor of North Carolina, focused on North Carolina with the intent that the statements’ impact would be felt in North Carolina, Lt. Gov.

Robinson felt the harm of Defendants' statements in North Carolina, and personal jurisdiction is consistent with the North Carolina Long Arm Statute, N.C. Gen. Stat. § 1-75.4. Further, Defendant Money lives in North Carolina.

7. Venue for this action is properly in Wake County, North Carolina, pursuant to North Carolina General Statutes § 1-82.

### The Defamatory Statements

8. On August 11, 2024, Defendant Money released a music video on YouTube—his band's first in three years—titled "The Lt. Governor Owes Me Money" (the "Music Video"). In the Music Video, a man in a suit, wearing a generic rubber mask of a black man, intended to depict Lt. Gov. Robinson, enters a pornography video store to view and purchase pornographic videos. In the Music Video, Defendant Money repeatedly addresses the song to "Mark" and to "Mr. Robinson," further identifying the subject as the "first black man" to hold the title of lieutenant governor. The lyrics of the song falsely accuse Lt. Gov. Robinson of owing money for a "bootleg" porn video that Defendant Money supposedly produced for him, which is the basis for the song's title.

9. *Within weeks* of this then-obscure, barely-viewed Music Video being published, Defendant Money was interviewed by a major online publication with links to George Soros, The Assembly. This resulted in an article published on September 3, 2024, titled "Ex-Porn Shop Employees Say Mark Robinson Was A Regular. He Denies It." (the "Assembly Article"). In the Assembly Article, Defendant Money falsely alleges that in the 1990s and early 2000s—when Lt. Gov. Robinson

was already a married father of two children—Robinson was a “frequent customer” at a pornographic video store where Money worked. According to Defendant Money’s outrageously false allegations, Lt. Gov. Robinson, for “several years,” hung out at the X-rated video store “five nights a week”—sometimes until 4:00 a.m.—“spending a good amount of money,” paying \$8 per video to preview “two or more” porn videos a night in a private booth, and purchasing “hundreds” of “bootleg” porn videos for \$20–\$25 a piece. According to Defendant Money, these bootleg videos were “super hardcore” and compiled from videos too risqué or extreme to sell in North Carolina. Echoing his false allegations from the Music Video, Defendant Money once again claims that Lt. Gov. Robinson owes him money for one of these bootleg porn videos.

10. These false allegations from the Music Video and the Assembly Article are hereinafter referred to collectively as the “Defendant Money Defamatory Statements.”

11. *Sixteen days after the Assembly Article*, CNN published an article, salaciously titled “I’m a black NAZI!: NC GOP nominee for governor made dozens of disturbing comments on porn forum” (the “CNN Article”). In the CNN Article, CNN falsely attributes statements allegedly made on a pornographic website, NudeAfrica.com, under the username “minisoldr” as being authored by Lt. Gov. Robinson. These falsely attributed statements include several lewd, sex-obsessed, racist, and outrageous statements, including the comment from the title of the article, “I’m a black NAZI!” CNN claims that these statements are only a “selection” and a “small portion” of graphic statements it attributes to Lt. Gov. Robinson from the

NudeAfrica website, suggesting that the withheld statements are even more obscene than those included in the CNN Article. The CNN Article also falsely claims that Lt. Gov. Robinson, as a married man, created an account on AdultFriendFinder.com, which is a website used to find sexual partners.

These false statements from the CNN Article are hereinafter referred to as the CNN Defamatory Statements.

### Factual Background

#### *Background of Lieutenant Governor Robinson*

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12. Mark Robinson is the father of two grown children, and husband of 34 years to his wife Yolanda. He is the lieutenant governor of North Carolina—the first black man to hold this position. He is the Republican candidate for governor. He is a community leader and passionate advocate for education and Constitutional rights. He is a role model. But this was all hard-fought. He had to lift himself out of poverty and out of bankruptcy. He overcame growing up with an abusive, alcoholic father, and stints in foster care. He was the first in his family to graduate from college.

13. CNN and Louis Love Money, in their cynical and malicious smears, are trying to tear him down and take away all that he has achieved by portraying him as something he is not.

14. After graduating high school, Mark Robinson joined the Army Reserve and served until 1993, when he was honorably discharged.

15. In the 1990s, Mark Robinson was a young father, struggling to provide for his family. During this period, he worked at Papa John's pizza, eventually being

promoted to manager, where he sometimes managed the closing shift. Nearby was an adult video store where Defendant Money worked. Lt. Gov. Robinson, who has always been a gregarious, outgoing person, made friends with Defendant Money, who also worked the night shift. He would occasionally bring over free pizza and socialize. More often, however, Defendant Money would come over to the Papa John's, looking for free or discounted pizza.

16. Contrary to the portrayal by Defendant Money, Lt. Gov. Robinson was not spending hours at the video store, five nights a week. He was not renting or previewing videos, and he did not purchase "bootleg" or other videos from Defendant Money. When Robinson managed the closing shift, usually closing at around midnight, he went home after work so that he could wake up at a reasonable hour and spend time with his wife and two young children. Robinson stopped working at Papa John's in or about early 2001, and from then until 2022 he never saw Defendant Money again.

17. After Papa John's, Robinson worked for various manufacturing companies, including Hayco, an aircraft manufacturer.

18. Lt. Gov. Robinson was an early adopter of Facebook. He joined in 2007, and he has maintained an unlocked, public account since then. He was also an active user, getting into heated political and social debates, with other Facebook users from those early days. Against the advice of many, he never deleted his history or made the account private. He believes in transparency. Even though his views have changed over the course of 17 years, as a public servant, Lt. Gov. Robinson believes

that North Carolina voters have the right to know what he has said in the past, and—critically to this lawsuit—what he has *not*.

19. In 2018, Lt. Gov. Robinson started a new chapter in his life, bursting onto the political scene as a complete outsider. He showed up to a city council meeting as a concerned citizen, because they were debating whether to cancel a gun show in the wake of a horrific school shooting in Parkland, Florida. He stood in line to speak his mind in defense of the Second Amendment and did so in a passionate speech that went viral on the internet.

20. From there, Lt. Gov. Robinson became far more interested and involved in politics. He became active in the Guilford County GOP, started giving speeches to organizations like the National Rifle Association, and in 2020 he threw his hat in the ring for lieutenant governor of North Carolina. To the surprise of many, including himself, he won.

21. As lieutenant governor, Robinson has been a tireless leader, helping to improve quality and access to education in North Carolina. He has been a fierce advocate for supporting North Carolina families, and pro-life initiatives. Currently, he is leading the effort to provide disaster relief to North Carolinians whose homes and livelihoods have been destroyed by Hurricane Helene.

*Defendant Money spins a defamatory fantasy*

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22. In 2022, Lt. Gov. Robinson was at Planet Fitness for his routine workout when he heard a friendly greeting. It was Defendant Money. Lt. Gov. Robinson recognized him but couldn't place him at the time. They had a pleasant conversation

that consisted mostly of Defendant Money saying how proud he was of Mark, and that it was great to see a regular, working-class guy succeed in politics. There was no talk about bootleg videos or Lt. Gov. Robinson owing him any money. Defendant Money asked for a photo with the lieutenant governor, and that was the end of the encounter.

23. Lt. Gov. Robinson didn't give this a second thought. He was regularly recognized for his public role, and he was always happy to speak with and take photos with constituents and acquaintances. Unknown to the lieutenant governor, however, Defendant Money would later use this encounter and their prior, passing acquaintance against him in a fantasy, concocted by Money to embarrass and tear him down, and to seek his own fifteen minutes of fame.

24. In August 2024, Defendant Money released the Music Video, as described above. Initially, it was seen by very few people. Within weeks, however, Defendant Money sat for an interview with The Assembly, a publication with ties to George Soros. The Assembly Article was viewed by tens of thousands of people, which also raised the profile of the Music Video, causing thousands of people to view and share it online.

25. While Defendant Money describes the song in the Assembly interview as a harmless "inside joke," the entire premise of the Music Video is not a joke, but a deliberate lie. Moreover, the Music Video was intended to be understood as fact, not as hyperbole or exaggeration. Defendant Money admits this in the Assembly Article.

26. Defendant Money spins his fantasy to even greater heights of falsity and depravity in the Assembly interview by claiming that Lt. Gov. Robinson—then a financially struggling, married father of two young children—was spending *every night* after work, for *hours* at a time—even until 4:00 a.m.—hanging out at an adult video store, and spending *thousands of dollars* on “hardcore,” bootleg porn videos—some too risqué or explicit to sell in the state of North Carolina—and on private booth previews. Every bit of this is knowingly false, but Defendant Money uses his selfie with Lt. Gov. Robinson in 2022, and his fellow porn store friends as supposed corroboration.

27. Defendant Money appears to take great pleasure from the publicity he is receiving from these lies. In a subsequent YouTube video, Defendant Money gloats over the publicity he has gotten and *thanks* Lt. Gov. Robinson for denying the story. In his X bio, he now describes himself as “the most famous former porn clerk in the world!”

28. Defendant Money tacitly admits that his story was timed to coincide with the election and cause Lt. Gov. Robinson maximum damage, saying “I’m glad I waited” to make the Music Video. He even posts memes on X suggesting that his Music Video “saved” young women by derailing the candidacy of a Republican, pro-life governor.

*CNN piles on with its own impeccably timed and recklessly false hit piece*

29. Prior to publication of the CNN Article, CNN reached out to Lt. Gov. Robinson. He specifically and unequivocally denied CNN’s allegations that he used

or created the “minisoldr” NudeAfrica profile or made any of those statements. He told CNN that it was entirely manufactured. CNN did not give Lt. Gov. Robinson any opportunity to inspect or investigate any of the source material for these alleged statements.

30. CNN, despite Lt. Gov. Robinson’s explicit denials, chose to publish the CNN Article based on data from a dubious website, supposed corroboration from unverified—indeed, *unverifiable*—data, apparently sourced from hacked, data breach files, obtained from the dark web. It chose to publish despite knowing or recklessly disregarding that Lt. Gov. Robinson’s data—including his name, date of birth, passwords, and the email address supposedly associated with the NudeAfrica account—were previously compromised by multiple data breaches. Any person could have purchased and/or used Lt. Gov. Robinson’s data to create accounts all over the internet. As CNN is aware, people who create accounts on websites like NudeAfrica, and AdultFriendFinder prefer *not* to use their own names and identities for obvious reasons.

31. The CNN Article includes reference to Defendant Money’s allegations as reported in the Assembly Article, provides a link to the Assembly Article, and notes Lt. Gov. Robinson’s denial. This re-reporting by CNN expanded the reach of Defendant Money’s Defamatory Statements even further.

32. On October 1, 2024, Lt. Gov. Robinson, by counsel, sent a retraction demand to CNN. Two days later, on October 3, 2024, Lt. Gov. Robinson further demanded that CNN produce the source material for its bogus allegations so that it

could be subjected to forensic scrutiny and verification. CNN responded the next day, refusing to retract the article and has still declined to produce any of its source material for inspection.

33. Almost immediately after the CNN Article broke, the management of NudeAfrica *shut down* the forum section of its website, where these alleged posts were supposedly archived. It then apparently *deleted* all messages from minisoldr, thereby removing any evidence that could be investigated. As of this filing, the owner of NudeAfrica has ignored all attempts to contact him.

34. CNN had every reason to doubt the veracity of the data upon which it relied. CNN knew that supposed archives from a suspicious website like NudeAfrica were unreliable and failed to meaningfully investigate or digitally scrutinize them. CNN knew that supposedly corroborating information it used was from unverifiable, dark web-sourced data breach files. CNN knew or recklessly disregarded the fact that Lt. Gov. Robinson's email, passwords, and personal data had been stolen. CNN knew that Lt. Gov. Robinson's facebook history, which is unlocked and transparent to all, goes back to 2007. CNN knew that just weeks prior to its article, Lt. Gov. Robinson had been targeted by another ludicrous and dubiously sourced hit piece by The Assembly. CNN knew that the election was less than two months away.

35. With all that knowledge, rather than conduct any kind of serious investigation or digital forensics on these supposedly decade-old posts, or even question the timing for their surfacing all-of-a-sudden, CNN recklessly proceeded to attribute them to Lt. Gov. Robinson. It disregarded or deliberately avoided the truth,

fully intending to derail Lt. Gov. Robinson’s political career. CNN’s continued failure to produce any source material and NudeAfrica’s cleansing of its website are telling on this point.

36. CNN—a politically left-wing media outlet, whose reporting is often indistinguishable from Democrat party talking points and opposes politically conservative candidates for office, including Lt. Gov. Robinson—intended to damage Lt. Gov. Robinson’s gubernatorial run. CNN published the CNN Article and attributed the “minisoldr” posts to Lt. Gov. Robinson despite harboring doubt over the veracity and verifiability of the supposedly supporting information and deliberately avoided the truth.

37. Lt. Gov. Robinson can never be fully compensated for the damage done by Defendants’ lies. His private and public lives have been devastated. Friends and family have turned their backs on him. He has been humiliated. It is therefore imperative that CNN, Money, and anyone else involved, be held fully accountable, not just to mitigate the harm they have done, but to vindicate Lt. Gov. Robinson and allow him to begin the healing process.

## COUNT I

### Defamation and Defamation *per se* against Defendant Money

38. Lt. Gov. Robinson realleges and incorporates paragraphs 1 through 37 above.

39. Defendant Money’s Defamatory Statements are knowingly false.

40. Defendant Money published his Defamatory Statements to thousands of people on the internet, via YouTube, X, and by giving an interview to The Assembly.

Defendant Money's lies, as intended by Defendant, have been reposted and reshared online to thousands more.

41. Defendant Money's Defamatory Statements are reasonably understood to be statements of fact, rather than hyperbole or opinion, as demonstrated not only by the language used by Defendant, but by the reactions and comments of hundreds of individuals who responded to and reposted Defendant's statements.

42. Defendant Money's Defamatory Statements have directly and proximately caused Lt. Gov. Robinson to suffer significant damages, including direct damages, damages to his reputation, public disgrace, humiliation, embarrassment, mental anguish, distress, and anxiety, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant Money.

43. Defendant Money, therefore, is liable for compensatory damages.

44. Defendant Money is also liable for punitive damages because of the wanton and outrageous nature of the defamation and Defendant Money's actual malice.

45. Defendant Money's Defamatory Statements are also defamatory *per se* because they subject Lt. Gov. Robinson to ridicule, contempt, and disgrace.

46. Defendant Money acted with actual malice and reckless disregard for the truth, as demonstrated by Defendant's extreme antipathy, ill-will, and desire to inflict harm on Lt. Gov. Robinson, his blatant fabrications, and his actual knowledge of the falsity of his statements.

**COUNT II**  
Defamation and Defamation *per se* against Defendant CNN

47. Lt. Gov. Robinson realleges and incorporates paragraphs 1 through 37 above.

48. CNN's Defamatory Statements are recklessly false.

49. Defendant CNN published its Defamatory Statements to hundreds of thousands of people on the internet, via its website and social media networks. Defendant CNN's Defamatory Statements, as intended by CNN, have been reposted and reshared online to thousands more.

50. Defendant CNN's Defamatory Statements are reasonably understood to be statements of fact because they are reported in a news article which purports to report facts.

51. Defendant CNN's Defamatory Statements have directly and proximately caused Lt. Gov. Robinson to suffer significant damages, including direct damages, damages to his reputation, public disgrace, humiliation, embarrassment, mental anguish, distress, and anxiety, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant CNN.

52. Defendant CNN, therefore, is liable for compensatory damages.

53. Defendant CNN is also liable for punitive damages because of the wanton and outrageous nature of the defamation and Defendant CNN's actual malice.

54. Defendant CNN's Defamatory Statements are also defamatory *per se* because they subject Lt. Gov. Robinson to ridicule, contempt, and disgrace.

55. Defendant CNN acted with actual malice and reckless disregard for the truth, as demonstrated by Defendant's antipathy, ill-will, and desire to inflict harm on Lt. Gov. Robinson, CNN's actual knowledge of the dubious nature and timing of the allegations, its use of unverifiable data to corroborate its reporting, its reckless failure to investigate, and its knowledge of exculpatory information and alternative explanations that it deliberately omitted from the CNN Article.

**Prayer for Relief**

WHEREFORE, Plaintiff Mark Robinson demands judgment against Defendants as follows:

- a. An award of compensatory, special, and punitive damages, as well as disgorgement of any and all income Defendants have made off of their lies about Mark Robinson, in an amount to be proven at trial, but no less than fifty million dollars (\$50,000,000.00);
- b. An award of Plaintiff's costs associated with this action; and
- c. Such other and further relief as the Court deems just and appropriate to protect Plaintiff's rights and interests.

Demand for Jury Trial

Plaintiff demands a trial by jury on all issues so triable.

Dated: October 15, 2024

MARK ROBINSON  
*By Counsel*

Respectfully submitted,

/s/ Anthony J. Biller  
Anthony J. Biller (NCB No. 24,117)  
Envisage Law  
2601 Oberlin Road, Suite 100  
Raleigh, NC 27608  
Phone: (919) 755-1317  
Fax: (919) 782-0452  
Email: ajbiller@envisage.law

Jesse R. Binnall  
(*pro hac vice* application forthcoming)  
Jason C. Greaves  
(*pro hac vice* application forthcoming)  
BINNALL LAW GROUP, PLLC  
717 King Street, Suite 200  
Alexandria, Virginia 22314  
Phone: (703) 888-1943  
Fax: (703) 888-1930  
Email: jesse@binnall.com  
jason@binnall.com

*Counsel for Plaintiff*

# **EXHIBIT 12**

**STATE OF NORTH CAROLINA  
COUNTY OF WAKE**

**MARK KEITH ROBINSON,**

**Plaintiff,**

**vs.**

**CABLE NEWS NETWORK, INC.,**

**LOUIS LOVE MONEY,**

**Defendants.**

**GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION**

**Case No. 24CV032897-910**

**MOTION FOR ADMISSION TO  
PRACTICE PURSUANT TO N.C. GEN.  
STAT. § 84-4.1**

Pursuant to North Carolina General Statutes (“N.C. Gen. Stat.”) § 84-4.1, Jesse Binnall, of Binnall Law Group, respectfully requests the Court to enter an order permitting him to practice *pro hac vice* before the Court on behalf of Plaintiff Mark Keith Robinson in the above-captioned case. In support of this motion, Mr. Binnall alleges and shows the following.

1 Mr. Binnall is an attorney in good standing, licensed to practice law in the State of Virginia, and he will appear on behalf of Plaintiff in the above-captioned case.

2 Mr. Binnall’s full name, address and bar identification number are:

Jesse Binnall  
BINNALL LAW GROUP, LLC  
717 King Street, Suite 200  
Alexandria, VA 22314  
Phone: (703) 888-1943  
Email: jesse@binnall.com  
Virginia Bar No. 79292

3 Mr. Binnall will continue to represent Plaintiff in the above-captioned case until the final determination thereof, unless permitted to withdraw sooner by order of the Court.

4 Mr. Binnall has agreed to be subject to the orders and is amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if he were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

5. The Bar of Virginia, in which Mr. Binnall is regularly admitted to practice, grants permission to members of the Bar of North Carolina in good standing to practice *pro hac vice* under circumstances similar to those authorized by N.C. Gen. Stat. § 84-4.1.

6. Mr. Binnall, who is a Partner with Binnall Law Group, is associated for purposes of appearing before the Court with Anthony Biller, Partner at Envisage Law and a resident of this State who is duly and legally permitted to practice in the General Court of Justice of North Carolina, upon whom service may be had in all matters connected with the legal proceedings, or any disciplinary matter, with the same effect as if personally made on Mr. Binnall.

7. Mr. Binnall has not been disciplined by any court or lawyer regulatory organization, nor has he had *pro hac vice* privileges revoked.

8. The Statements required by N.C. Gen. Stat. § 84-4.1 are attached to this motion.

9. Upon issuance of an order granting this motion, the appropriate filings and fees will be made to the State Treasurer for support of the General Court of Justice and to the North Carolina State Bar as required by N.C. Gen. Stat. §84-4.1. At that time, Mr. Binnall will also file with the Court a copy of the checks paid as filing fees.

WHEREFORE, Plaintiff Mark Keith Robinson respectfully requests that this Motion be granted and that Jesse Binnall, be allowed to appear before the Court in this matter.

Respectfully submitted, this 15th day of October 2024.

/s/Anthony J. Biller  
Anthony Biller (NC Bar No. 24,117)  
Envisage Law  
2601 Oberlin Rd, Ste 100  
Raleigh, NC 27608  
981.344.9191  
ajbiller@envisage.law  
abanks@envisage.law

/s/Jesse Binnall  
Jesse Binnall (VA Bar No. 79292)  
BINNALL LAW GROUP, PLLC

717 King Street, Suite 200  
Alexandria, Virginia 22314  
Phone: (703) 888-1943  
Email: [jesse@binnall.com](mailto:jesse@binnall.com)

# **EXHIBIT 13**

**STATE OF NORTH CAROLINA  
COUNTY OF WAKE**

**GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION**

MARK KEITH ROBINSON,

Case No. 24CV032897-910

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

**STATEMENT REQUIRED BY N.C. GEN.  
STAT. § 84-4.1**

LOUIS LOVE MONEY,

Defendants.

I, Jesse Binnall, hereby state that:

1. I am an attorney at law regularly admitted to practice and in good standing in the State of Virginia.

2. I am counsel for Plaintiff Mark Keith Robinson and desire to represent him in the above-captioned case, which is currently pending in the Wake County General Court of Justice, Superior Division.

3. My full name, address and bar identification numbers are:

Jesse Binnall  
BINNALL LAW GROUP, LLC  
717 King Street, Suite 200  
Alexandria, VA 22314  
Phone: (703) 888-1943  
Email: jesse@binnall.com  
Virginia Bar No. 79292

4. I will, unless permitted to withdraw sooner by order of the Court, continue to represent Mr. Robinson in the above-captioned case until the final determination thereof.

5. I agree, with reference to all matters incident to Court proceedings, to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of this Court, the General Court of Justice, and the North Carolina State Bar in all respects as if I

were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

6. The State of Virginia, in which I am regularly admitted to practice, grants similar privileges to appear on a limited basis in judicial and regulatory proceedings being conducted in that jurisdiction to members of the Bar of North Carolina.

7. I have associated, for purposes of appearing and practicing in Court proceedings, with Anthony Biller, Partner at Envisage Law, 2601 Oberlin Rd, Ste 100, Raleigh, North Carolina 27608, an attorney who is a resident of the State of North Carolina and who is duly and legally permitted to practice in the General Court of Justice in North Carolina, upon whom service may be had in all matters connected with the above-captioned proceeding or any disciplinary matter, with the same effect as if personally made on me within this State.

8. I have not been disciplined by any court or lawyer regulatory organization and have not had a revocation of any *pro hac vice* admission.

/s/Jesse Binnall  
Jesse Binnall

# **EXHIBIT 14**

**STATE OF NORTH CAROLINA  
COUNTY OF WAKE**

**GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION**

MARK KEITH ROBINSON,

Case No. 24CV032897-910

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

**STATEMENT REQUIRED BY N.C. GEN.  
STAT. § 84-4.1(2)**

LOUIS LOVE MONEY,

Defendants.

I, Mark Keith Robinson, hereby certify that I am the Plaintiff in the above-captioned case pending in the Wake County General Court of Justice, Superior Division, and I have requested that Jesse Binnall, represent me before this Court, in association with Anthony Biller, Partner at Envisage Law, 2601 Oberlin Rd, Ste 100, Raleigh, North Carolina 27608.

/s/ Mark Keith Robinson

Mark Keith Robinson

# **EXHIBIT 15**

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

MARK KEITH ROBINSON,  
  
Plaintiff,

Case No. 24CV032897-910

vs.

**ORDER PERMITTING OUT-OF-STATE  
COUNSEL TO APPEAR (G.S. § 84-4.1)**

CABLE NEWS NETWORK, INC.,

LOUIS LOVE MONEY,

Defendants.


This cause was heard before the undersigned Judge Presiding on written motion by find, that he be admitted to practice in the General Court of Justice for the sole purpose of appearing for Plaintiff Mark Keith Robinson in this litigation, and it appearing to the court that Jesse Binnall, has complied with the provisions of G.S. 84-4.1, the court finds that:

1. Jesse Binnall is a practicing attorney in good standing in the State of Virginia;
2. He has been retained in this cause to represent Plaintiff Mark Keith Robinson;
3. He will continue to represent Plaintiff Mark Keith Robinson, subject to the rules of practice of the General Court of Justice, until permitted to withdraw;
4. The State of Virginia grants like privileges to the members of the North Carolina bar; and
5. Anthony Biller, a duly licensed attorney of this state with residence in Raleigh, is associated and is personally appearing with Jesse Binnall, in this case.

Based on the foregoing findings of fact, the court concludes that it will be proper to admit Jesse Binnall, of the Virginia bar, to appear as counsel for Plaintiff Mark Keith Robinson in this litigation.

THEREFORE, IT IS ORDERED, in the discretion of the court, that Jesse Binnall, be and is hereby admitted to practice in the General Court of Justice for the sole purpose of appearing for Plaintiff Mark Keith Robinson in this litigation.

This, the 21st day of October, 2024.

THE HONORABLE   
Superior Court Judge Presiding

10/21/2024 2:59:28 PM

Paul C. Ridgeway  
Senior Resident Superior Court Judge

# **EXHIBIT 16**

**STATE OF NORTH CAROLINA  
COUNTY OF WAKE**

**MARK KEITH ROBINSON,**

**Plaintiff,**

**vs.**

**CABLE NEWS NETWORK, INC.,**

**LOUIS LOVE MONEY,**

**Defendants.**

**GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION**

**Case No. 24CV032897-910**

**MOTION FOR ADMISSION TO  
PRACTICE PURSUANT TO N.C. GEN.  
STAT. § 84-4.1**

Pursuant to North Carolina General Statutes (“N.C. Gen. Stat.”) § 84-4.1, Jason C. Greaves, of Binnall Law Group, respectfully requests the Court to enter an order permitting him to practice *pro hac vice* before the Court on behalf of Plaintiff Mark Keith Robinson in the above-captioned case. In support of this motion, Mr. Greaves alleges and shows the following.

1 Mr. Greaves is an attorney in good standing, licensed to practice law in the State of Virginia, and he will appear on behalf of Plaintiff in the above-captioned case.

2 Mr. Greaves’ full name, address and bar identification number are:

Jason C. Greaves  
BINNALL LAW GROUP, LLC  
717 King Street, Suite 200  
Alexandria, VA 22314  
Phone: (703) 888-1943  
Email: jason@binnall.com  
Virginia Bar No. 86164

3 Mr. Greaves will continue to represent Plaintiff in the above-captioned case until the final determination thereof, unless permitted to withdraw sooner by order of the Court.

4 Mr. Greaves has agreed to be subject to the orders and is amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if he were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

5. The Bar of Virginia, in which Mr. Greaves is regularly admitted to practice, grants permission to members of the Bar of North Carolina in good standing to practice *pro hac vice* under circumstances similar to those authorized by N.C. Gen. Stat. § 84-4.1.

6. Mr. Greaves, who is a Partner with Binnall Law Group, is associated for purposes of appearing before the Court with Anthony Biller, Partner at Envisage Law and a resident of this State who is duly and legally permitted to practice in the General Court of Justice of North Carolina, upon whom service may be had in all matters connected with the legal proceedings, or any disciplinary matter, with the same effect as if personally made on Mr. Greaves.

7. Mr. Greaves has not been disciplined by any court or lawyer regulatory organization, nor has he had *pro hac vice* privileges revoked.

8. The Statements required by N.C. Gen. Stat. § 84-4.1 are attached to this motion.

9. Upon issuance of an order granting this motion, the appropriate filings and fees will be made to the State Treasurer for support of the General Court of Justice and to the North Carolina State Bar as required by N.C. Gen. Stat. §84-4.1. At that time, Mr. Greaves will also file with the Court a copy of the checks paid as filing fees.

WHEREFORE, Plaintiff Mark Keith Robinson respectfully requests that this Motion be granted and that Jason C. Greaves, be allowed to appear before the Court in this matter.

Respectfully submitted, this 15th day of October 2024.

/s/Anthony J. Biller  
Anthony Biller (NC Bar No. 24,117)  
Envisage Law  
2601 Oberlin Rd, Ste 100  
Raleigh, NC 27608  
981.344.9191  
ajbiller@envisage.law  
abanks@envisage.law

/s/Jason C. Greaves  
Jason C. Greaves (VA Bar No. 86164)  
BINNALL LAW GROUP, PLLC

717 King Street, Suite 200  
Alexandria, Virginia 22314  
Phone: (703) 888-1943  
Email: [jason@binnall.com](mailto:jason@binnall.com)

# **EXHIBIT 17**

**STATE OF NORTH CAROLINA  
COUNTY OF WAKE**

**GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION**

MARK KEITH ROBINSON,

Case No. 24CV032897-910

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

**STATEMENT REQUIRED BY N.C. GEN.  
STAT. § 84-4.1**

LOUIS LOVE MONEY,

Defendants.

I, Jason C. Greaves, hereby state that:

1. I am an attorney at law regularly admitted to practice and in good standing in the State of Virginia.

2. I am counsel for Plaintiff Mark Keith Robinson and desire to represent him in the above-captioned case, which is currently pending in the Wake County General Court of Justice, Superior Division.

3. My full name, address and bar identification numbers are:

Jason C. Greaves  
BINNALL LAW GROUP, LLC  
717 King Street, Suite 200  
Alexandria, VA 22314  
Phone: (703) 888-1943  
Email: jason@binnall.com  
Virginia Bar No. 86164

4. I will, unless permitted to withdraw sooner by order of the Court, continue to represent Mr. Robinson in the above-captioned case until the final determination thereof.

5. I agree, with reference to all matters incident to Court proceedings, to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of this Court, the General Court of Justice, and the North Carolina State Bar in all respects as if I

were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

6. The State of Virginia, in which I am regularly admitted to practice, grants similar privileges to appear on a limited basis in judicial and regulatory proceedings being conducted in that jurisdiction to members of the Bar of North Carolina.

7. I have associated, for purposes of appearing and practicing in Court proceedings, with Anthony Biller, Partner at Envisage Law, 2601 Oberlin Rd, Ste 100, Raleigh, North Carolina 27608, an attorney who is a resident of the State of North Carolina and who is duly and legally permitted to practice in the General Court of Justice in North Carolina, upon whom service may be had in all matters connected with the above-captioned proceeding or any disciplinary matter, with the same effect as if personally made on me within this State.

8. I have not been disciplined by any court or lawyer regulatory organization and have not had a revocation of any *pro hac vice* admission.

/s/ Jason C. Greaves  
Jason C. Greaves

# **EXHIBIT 18**

**STATE OF NORTH CAROLINA  
COUNTY OF WAKE**

**GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION**

MARK KEITH ROBINSON,

Case No. 24CV032897-910

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

**STATEMENT REQUIRED BY N.C. GEN.  
STAT. § 84-4.1(2)**

LOUIS LOVE MONEY,

Defendants.

I, Mark Keith Robinson, hereby certify that I am the Plaintiff in the above-captioned case pending in the Wake County General Court of Justice, Superior Division, and I have requested that Jason C. Greaves, represent me before this Court, in association with Anthony Biller, Partner at Envisage Law, 2601 Oberlin Rd, Ste 100, Raleigh, North Carolina 27608.

/s/ Mark Keith Robinson

Mark Keith Robinson

# **EXHIBIT 19**

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

MARK KEITH ROBINSON,  
  
Plaintiff,

Case No. 24CV032897-910

vs.

**ORDER PERMITTING OUT-OF-STATE  
COUNSEL TO APPEAR (G.S. § 84-4.1)**

CABLE NEWS NETWORK, INC.,

LOUIS LOVE MONEY,

Defendants.

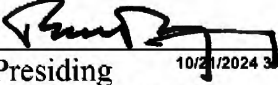
This cause was heard before the undersigned Judge Presiding on written motion by Jason C. Greaves, that he be admitted to practice in the General Court of Justice for the sole purpose of appearing for Plaintiff Mark Keith Robinson in this litigation, and it appearing to the court that Jason C. Greaves, has complied with the provisions of G.S. 84-4.1, the court finds that:

1. Jason C. Greaves is a practicing attorney in good standing in the State of Virginia;
2. He has been retained in this cause to represent Plaintiff Mark Keith Robinson;
3. He will continue to represent Plaintiff Mark Keith Robinson, subject to the rules of practice of the General Court of Justice, until permitted to withdraw;
4. The State of Virginia grants like privileges to the members of the North Carolina bar; and
5. Anthony Biller, a duly licensed attorney of this state with residence in Raleigh, is associated and is personally appearing with Jason C. Greaves, in this case.

Based on the foregoing findings of fact, the court concludes that it will be proper to admit Jason C. Greaves, of the Virginia bar, to appear as counsel for Plaintiff Mark Keith Robinson in this litigation.

THEREFORE, IT IS ORDERED, in the discretion of the court, that Jason C. Greaves, be and is hereby admitted to practice in the General Court of Justice for the sole purpose of appearing for Plaintiff Mark Keith Robinson in this litigation.

This, the 21st day of October, 2024.

THE HONORABLE   
Superior Court Judge Presiding 10/21/2024 3:00:09 PM  
Paul C. Ridgeway  
Senior Resident Superior Court Judge

# **EXHIBIT 20**

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

MARK KEITH ROBINSON,

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

LOUIS LOVE MONEY,

Defendants.

GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

Case No. 24CV032897-910

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the **ORDERS PERMITTING OUT-OF-STATE COUNSEL TO APPEAR**, in the above referenced case, were served on the following parties to this action by:

(x) US Mail to:

Cable News Network, Inc.  
Registered Agent:  
CT Corporation Services  
160 Mine Lake Ct., Suite 200  
Raleigh, NC 27615

(x) electronic mail to:

Andy L. Fitzgerald  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
D. Stuart Punger, Jr.  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)  
Peter D. Zellmer  
[Peter.Zellmer@Zellmerlegal.com](mailto:Peter.Zellmer@Zellmerlegal.com)  
*Attorneys for Louis Love Money*

Respectfully submitted, this 22nd day of October 2024.

/s/Anthony J. Biller  
Anthony Biller (NC Bar No. 24117)  
Envisage Law  
2601 Oberlin Rd, Ste 100  
Raleigh, NC 27608  
Phone: (919) 755-1317

ajbiller@envisage.law

/s/ Jason C. Greaves

Jason C. Greaves (VA Bar No. 86164)

*(pro hac vice)*

Jesse Binnall (VA Bar No. 79292)

*(pro hac vice)*

BINNALL LAW GROUP, PLLC

717 King Street, Suite 200

Alexandria, Virginia 22314

Phone: (703) 888-1943

Email: [jason@binnall.com](mailto:jason@binnall.com)

Email: [jesse@binnall.com](mailto:jesse@binnall.com)

# **EXHIBIT 21**

NORTH CAROLINA  
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
24CV032897-910

MARK KEITH ROBINSON, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 CABLE NEWS NETWORK, INC. and )  
 LOUIS LOVE MONEY, )  
 )  
 Defendants. )  
 )  
 )  
 )

**MOTION TO DISMISS**

Comes Now Defendant Louis Love Money (“Money”), through counsel, pursuant to Rules 8(a)(2), 41(b), 12(b)(6), and this Court’s inherent authority, to dismiss the claim against Mr. Money.

The Complaint contains many impertinent and bizarre allegations, meandering into two discussions of George Soros, conspiracies about media bias, and applauding Mark Robinson for lifting himself out of bankruptcy. The Complaint also sues CNN, and of course the lawsuit has been highlighted by nearly every if not every local news network in North Carolina and has been discussed in the national media.

Rule 8(a)(2) was enacted to prevent the amount of money someone seeks in a case from being pled in the addendum clause, instead requiring at this time that a person pleads only that they seek damages in excess of \$25,000. The Rule particularly and expressly applies when punitive damages are pled (as here). Its purpose is to prevent excess demands from leaking publicly in the media and tainting the judicial process. That policy was highlighted in *Schell v.*

*Coleman*, 380 S.E.2d 662 (N.C. App. 1983). In *Schell*, the Court of Appeals affirmed dismissal of a Complaint based in large part to media coverage that resulted from a violation of Rule 8(a)(2) that was far less comprehensive than what could be expected and occurred here, with a sexually and racially charged governor race in a key swing state. In fact, given the seniority of the counsel signing Mr. Robinson's Complaint, it has to be considered that the violation of Rule 8(a)(2) may have been for the very purpose of creating media attention for Mr. Robinson's campaign by creating a rambling narrative regarding CNN, Mr. Robinson, and a man who did an obscure video poking fun of Mr. Robinson for frequenting a pornography store (which the Complaint seems to at least partially agree with as alleged in paragraph 15) and for owing him \$25. Somehow, according to Mr. Robinson, that caused him \$50,000,000 of damages.

In fact, according to the Raleigh News and Observer, Mr. Robinson held a press conference to emphasize his lawsuit on October 15. "NC's Mark Robinson sued CNN for \$50 million over story revealing porn website posts" by Kyle Ingram, <https://www.newsobserver.com/news/politics-government/election/article293991224.html>, last accessed October 15, 2024 at 9:28 pm. The News and Observer seized on the \$50,000,000 punch line, which is exactly what Rule 8(a)(2) seeks to prevent.

A picture of Mr. Robinson at his press conference with his attorney, who countenanced his discussion of wanting \$50,000,000, is Exhibit 1. <https://ncnewslines.com/2024/10/15/mark-robinson-sues-cnn-and-ex-porn-store-clerk-alleging-reports-about-him-were-defamatory/?sfnsn=mo> Last accessed October 15, 2024, 10:26 pm. Mr. Binall is not licensed in North Carolina but is a signatory to the Complaint with a note that a pro hac vice application is forthcoming.

WHEREFORE, Money asks that the Complaint be dismissed, that costs and attorney fees be taxed against the plaintiff and/or his counsel, and that the Court hold a hearing on the nature and source of the violation of Rule 8(a)(2) before considering any motions for admission pro hac vice.

This the 16<sup>th</sup> day of October 2024.

/s/ Andrew L. Fitzgerald  
Andrew L. Fitzgerald, N.C.S.B. No. 31522  
D. Stuart Punger, Jr., N.C.S.B. No. 35517  
FITZGERALD HANNA & SULLIVAN, PLLC  
119 Brookstown Avenue, Suite 402  
Winston-Salem, NC 27101  
Telephone/Fax: 336-793-4696  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)

/s/ Peter D. Zellmer  
Peter D. Zellmer  
Peter D. Zellmer, PLLC  
421 N. Edgeworth Street  
Greensboro, NC 27401  
Telephone: 336-274-1168  
[Peter.Zellmer@zellmerlegal.com](mailto:Peter.Zellmer@zellmerlegal.com)

*Counsel for Louis Love Money*

**CERTIFICATE OF SERVICE**

This is to certify that the undersigned has this date served a copy of the foregoing MOTION TO DISMISS upon all other parties to this action by electronically filing with the File & Serve System which will send electronic notification to the following:

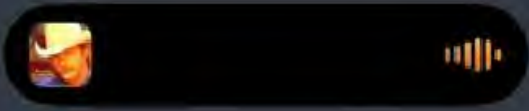
ADDRESSEE(S):

Anthony J. Biller  
Envisage Law  
2601 Oberlin Road, Suite 100  
Raleigh, NC 27608  
Phone: (919) 755-1317  
Fax: (919) 782-0452  
[ajbiller@envisage.law](mailto:ajbiller@envisage.law)

Jesse R. Binnall  
Jason C. Greaves  
BINNALL LAW GROUP, PLLC  
717 King Street, Suite 200  
Alexandria, Virginia 22314  
Phone: (703) 888-1943  
Fax: (703) 888-1930  
[jesse@binnall.com](mailto:jesse@binnall.com)  
[jason@binnall.com](mailto:jason@binnall.com)

This the 16<sup>th</sup> day of October 2024.

/s/ Andrew L. Fitzgerald  
Andrew L. Fitzgerald, N.C.S.B. No. 31522  
D. Stuart Punger, Jr., N.C.S.B. No. 35517  
FITZGERALD HANNA & SULLIVAN, PLLC  
119 Brookstown Avenue, Suite 402  
Winston-Salem, NC 27101  
Telephone/Fax: 336-793-4696  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)



# Mark Robinson sues CNN and ex-porn store clerk, alleging reports about him were defamatory

Louis Money, sued by the lieutenant governor, says “you can’t sue me for telling the truth”

BY: **GALEN BACHARIER** - OCTOBER 15, 2024 11:13 AM



North Carolina Lt. Gov. Mark Robinson (left) and his attorney Jesse Binnall hold a news conference to announce a lawsuit against CNN and Louis Money of Greensboro in Raleigh, North Carolina on Oct. 15, 2024. (Photo: Galen Bacharier/NC Newsline)

Lt. Gov. Mark Robinson [sued](#) CNN and a former clerk at a porn store in Greensboro on Tuesday, alleging that they defamed the Republican candidate for governor in news reports about him

# **EXHIBIT 22**

NORTH CAROLINA  
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
24CV032897-910

MARK KEITH ROBINSON, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 CABLE NEWS NETWORK, INC. and )  
 LOUIS LOVE MONEY, )  
 )  
 Defendants. )  
 )  
 )

**BRIEF IN SUPPORT OF MOTION TO  
DISMISS**

Comes Now Defendant Louis Love Money (“Money”) and submits this Brief in Support of his Motion to Dismiss.

This motion is remarkably simple. An out-of-state attorney, who had not yet received an Order admitting him to the Court in North Carolina via *pro hac vice* motion, decided to blatantly violate Rule 8 and ask for \$50,000,000.00 in a complaint instead of using the pleading rule known to all North Carolina attorneys and published in the Rules of Civil Procedure requiring him only to plead in excess of \$25,000.00. The reason is incredibly obvious. This case is about publicity and a stunt to pump life into Mark Robinson’s dying gubernatorial candidacy.

To make matters worse, the same lawyer decided to have a press conference in North Carolina, where he is not admitted to practice law, talking about how the case was worth \$50,000,000.00. In other words, he made his media spectacle, and predictably the media picked up on the \$50,000,000.00 price tag as the punchline.

The case law makes clear that the point of the rule requiring that pleading only be made in excess of \$25,000.00 in North Carolina is to prevent publicity. Not only did the actions of Mr.

Robinson's attorneys violate that rule, but the corresponding press conference made sure that the \$50,000,000.00 tag - that our General Assembly has gone to great pains to ensure would not happen - did in fact happen. The jury pool has been tainted. The media spectacle has occurred. No subsequent amendment can change that reality. The damage is done, and the court must do whatever it must do to make sure that the harm is completely and totally remedied.

To make matters worse, as Exhibit 1 to this brief shows, a person named Matt Hurley tweeted on October 22 that Robinson would actually receive in excess of \$50,000,000, apparently believing that the press covering Money's motion to dismiss is "election interference" and that the Rules of Civil Procedure are "legalese". As Exhibit 2 shows, this Hurley came onto the Robinson campaign when most of his staff understandably left when it came out that Robinson was engaged in untoward behavior on a pornographic site. The timing was 4 days after Robinson amended his Complaint to try to comply with Rule 8, but obviously his campaign has contempt for the Rules and again, after the Amended Complaint, is trying to circumvent Rule 8, again. Mr. Hurley doubled down again directly to the media on October 22, making sure the story was disseminated that Robinson was only altering his demand in the Complaint for procedural reasons but that he still was seeking \$50,000,000. Exhibit 3.

To that end, the remedy that should occur is Dismissal.

Alternately, if in fact, there is any sincerity whatsoever in Robinson's complaint, which we can assume for purposes of this paragraph there is some sincerity to the Complaint, and Robinson truly believe that he is going to obtain \$50,000,000.00, Mark Robinson and his attorneys should be delighted at the opportunity to avoid dismissal of its action by merely paying 1% of the demand that it put in the Complaint as a sanction. In fact, if Mark Robinson were to win a \$50,000,000.00 judgment a year from now, the interest alone would be \$4,000,000.00 in North Carolina. The 1%

sanction would only be 12.5% of the interest on the judgment. So, if Mark Robinson wants to keep his case going, there should be no opposition from Mark Robinson whatsoever given the blatant violation of the Rules of Civil Procedure by a non-licensed attorney followed by a subsequent press conference and violative tweet by his campaign to pay a mere 1% of the case value pre interest as a sanction for his misconduct. Therefore, as an alternate to dismissal, Mr. Money asks for a mere 1% of the amount demanded in the Complaint to remedy and deter the conduct that have been damaged Mr. Money and the judicial process by the violation of the Rules of Civil Procedure.

In conclusion, Mr. Money asks for dismissal or alternatively, or a mere 1% of the \$50,000,000.00 that Mr. Robinson and his attorneys have asserted both in court and in the media is the value of this case.

This the 4<sup>th</sup> day of November 2024.

/s/ Andrew L. Fitzgerald  
Andrew L. Fitzgerald, N.C.S.B. No. 31522  
D. Stuart Punger, Jr., N.C.S.B. No. 35517  
FITZGERALD HANNA & SULLIVAN, PLLC  
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Winston-Salem, NC 27101  
Telephone/Fax: 336-793-4696  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)

/s/ Peter D. Zellmer  
Peter D. Zellmer  
Peter D. Zellmer, PLLC  
421 N. Edgeworth Street  
Greensboro, NC 27401  
Telephone: 336-274-1168  
[Peter.Zellmer@zellmerlegal.com](mailto:Peter.Zellmer@zellmerlegal.com)

*Counsel for Louis Love Money*

**CERTIFICATE OF SERVICE**

This is to certify that the undersigned has this date served a copy of the foregoing BRIEF IN SUPPORT OF MOTION TO DISMISS upon all other parties to this action by electronically filing with the File & Serve System which will send electronic notification to the following:

ADDRESSEE(S):

Anthony J. Biller  
Envisage Law  
2601 Oberlin Road, Suite 100  
Raleigh, NC 27608  
Phone: (919) 755-1317  
Fax: (919) 782-0452  
[ajbiller@envisage.law](mailto:ajbiller@envisage.law)

Jesse R. Binnall  
Jason C. Greaves  
BINNALL LAW GROUP, PLLC  
717 King Street, Suite 200  
Alexandria, Virginia 22314  
Phone: (703) 888-1943  
Fax: (703) 888-1930  
[jesse@binnall.com](mailto:jesse@binnall.com)  
[jason@binnall.com](mailto:jason@binnall.com)

This the 4<sup>th</sup> day of November 2024.

/s/ Andrew L. Fitzgerald  
Andrew L. Fitzgerald, N.C.S.B. No. 31522  
D. Stuart Punger, Jr., N.C.S.B. No. 35517  
FITZGERALD HANNA & SULLIVAN, PLLC  
119 Brookstown Avenue, Suite 402  
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Telephone/Fax: 336-793-4696  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)



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**Matt Hurley** ✓  
@mhurleyofficial

Follow



Bottom Line:

The press wants to focus on legalese so they can distract the voters from the real efforts to hold CNN accountable for election interference.

When the full set of facts are presented to a jury, they are likely to award Robinson far in excess of \$50,000,000.

12:34 PM · Oct 22, 2024 · 705 Views

15 Reposts 53 Likes



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x.com



JUST IN

**Tropical Storm Rafael forms: Tropical storm conditions expected to begin late tonight in Jamaica**



@NCCAPITOL

## Mark Robinson hires new top staff, touts wife's



☀️ 71°F 🔍 @ ▾

### campaign

North Carolina Lt. Gov. Mark Robinson, with a new chief of staff and a new campaign manager, marched ahead with a series of meet-and-greets on Friday -- even as a strong storm moved through the state.

Posted 3:40 p.m. Sep 27 - Updated 6:35 a.m. Sep 28



FILE — Lt. Gov. Mark Robinson, the Republican candidate for governor, arrives onstage to speak at a campaign rally for former President Donald Trump, the Republican candidate for president, in Asheville, N.C., on Aug. 14, 2024. Robinson returned to the campaign trail on Monday, Sept. 23, 2024, in North Carolina, insisting that he will remain in the governor's race even after most of his staff resigned following a CNN report linking him to numerous disturbing comments on a pornographic website. (Doug Mills/The New York Times)

By **Jack Hagel, Paul Specht** and **Will Doran, WRAL News**

**T↑ T↑ T↑**

In the hours after CNN released a bombshell report about lewd, racist and pornographic comments the network tied to North Carolina Lt. Gov. Mark Robinson, Robinson vowed to stay in the race for governor. And in the days since the report, despite considerable turmoil within his campaign and state office, he is doing just that.

In recent days, the Republican nominee has pressed ahead amid staff departures, criticism from fellow Republicans, and sobering poll results.





On Thursday, Robinson named Krishana Polite as his chief of staff in the state office of the lieutenant governor. She replaces Brian LiVecchi, who was in that role and also served as the office's general counsel before submitting his resignation as part of a wave of departures from the state office.

On the campaign side, political consultant Matt Hurley has been picked to replace Conrad Pogorzelski. Hurley said he had taken over on a call with grassroots Robinson supporters on Thursday, a person who was on the call told WRAL News. Pogorzelski recently resigned as the Robinson campaign's senior advisor, part of a mass exodus of campaign staff in the wake of the CNN report.

Robinson on Tuesday announced that he had hired a Virginia-based law firm to investigate the CNN report. The firm is led by Jesse Binnall, who was one of former President Donald Trump's lawyers in disputing the results of the 2020 election.

On Thursday, Robinson launched a new video featuring his wife, Yolanda Hill, who sought to share with voters "the Mark Robinson that I know."



**Robinson offers 'complete cooperation and full transparency' in probe of porn-comments report**

And on Friday, the candidate pressed ahead with an ambitious series of meet-and-greets — even as a damaging storm moved through the state. In a statement to WRAL, Robinson said his campaign is moving full-speed ahead.

“We won’t be bullied by leftist media like CNN and more of the same outrageous lies we’ve seen from Josh Stein and his friends,” Robinson said. “Just like President Trump, my team and I are barnstorming North Carolina, making our case to the voters — who are desperately in need of real solutions to the problems they’re facing.”

On social media, Robinson warned supporters to travel safely.

“Beyond excited to be back on the campaign trail!” Robinson wrote on social media. “If you are on the road to visit us, be safe and drive carefully.” A subsequent post showed pictures of him with voters in a room featuring a lifesize cardboard cutout of Trump and his wife Melania Trump.

Such visits have become more important to the campaign — especially as the Nov. 5 general election nears, and as he faces fallout from the CNN report. The Republican Governors Association has said it has no plans to fund more ads on Robinson’s behalf — notable since it had been thought to be putting more money into advertising than Robinson’s own campaign had.

Robinson had already been ramping up visits this month before the CNN report, which linked Robinson to posts on a website called Nude Africa. The comments praised Adolf Hitler, called for the reinstatement of slavery, and described explicit pornographic preferences. In one post, Robinson called himself “a Black Nazi,” CNN reported. The network tied Robinson to the account with his email address, profile picture and user name that matched ones he used on other sites. The comments were made before Robinson entered public office.

Robinson has denied allegations made in the report, calling them false even before any details became public. He has suggested he was the victim of internet trickery, but gave few details. He has since been under pressure by some Republicans to offer evidence to support his denials. CNN hasn't responded to WRAL's requests for comment on the matter.



### **Trump's Impulse After Robinson Bombshell Report: Ignore, and Power Through**

While no prominent North Carolina Republicans have revoked their endorsements of Robinson, few have publicly come to Robinson's defense, either. Some Republicans, including U.S. Sen. Thom Tillis, have called on Robinson to disprove the allegations in the CNN report.

“If Mr. Robinson doesn't set forth a case that provides some credibility to a counterargument, then I think that most of us should move on, not be concerned with this race,” Tillis wrote on social media regarding Robinson's denials so far.

Robinson trailed Democratic gubernatorial nominee Josh Stein in the polls even before CNN published its report. A Meredith Poll conducted as news of the report spread suggests its allegations are further dampening support for Robinson.

Poll responses collected before the CNN report was published showed Stein leading Robinson by 8 points (50% to 42%). Responses gathered after the report, however, showed a 13-point gap favoring Stein (50% to 37%). Although support for Stein didn't grow, his lead over Robinson widened.

"It appears that the CNN story peeled Robinson supporters away from him without adding to Stein's support," Meredith said in a summary of the results.

Robinson told WRAL Friday that he plans to continue elevating issues that North Carolinians care about, such as immigration, crime, and drug overdoses.

"There is too much at stake," Robinson said. "We've got to take our state and country back from far-left career politicians like Harris and Stein by voting Republican up and down the ballot on Nov. 5."

And Robinson's wife is asking voters to give him a chance: A campaign video posted online Thursday night shows Hill publicly supporting her husband and dismissing the reports about his online presence as lies.



**Robinson rejected offers of tech help to investigate posts on porn site, sources say**

"Lord knows you've heard a lot about my husband Mark," she says, pouring herself a cup of coffee as the video shows news coverage before pivoting back to Hill, now sitting down with a Bible.

"Despite growing up in poverty, with an alcoholic father who abused his mother, Mark has been a wonderful husband, father and grandfather," Hill says. "... He is known sometimes to raise his voice, and raise a ruckus. But it is all because of the passion he has to protect North Carolina."

### **Abortion debate**

Stein has led every major poll for the last three months, widening his lead as he elevated some of Robinson's past remarks on abortion and women. Stein's first ad of the campaign featured nothing but clips of Robinson talking about abortion, including footage from a 2019 Facebook video in which Robinson said: "Abortion in this country is not about protecting the lives of mothers. It's about killing the child because you weren't responsible enough to keep your skirt down."

Robinson has referred to abortion as murder and said he'd support banning the procedure after the 6th week of pregnancy, with some exceptions. That proposal is much stricter than the law Republican legislative leaders enacted last year, which bans most abortions after the 12th week of pregnancy, with exceptions. Last month, Trump referred to Florida's 6-week abortion ban as "too short," while later saying he'll vote in a referendum to keep it in place.

A day after CNN published its report, Vice President Kamala Harris's gubernatorial campaign launched a television ad featuring clips of Robinson's abortion statements alongside clips of Trump praising Robinson. The Democratic National Committee also erected billboards that feature images of Trump and Robinson together.

On Friday, the Stein campaign launched a new television ad, again condemning Robinson's abortion comments.

It features a woman who says she wanted a baby, but had to get an abortion because of medical complications with the pregnancy that threatened her safety. It shows her reacting to Robinson's comment that women get abortions "because you weren't responsible enough to keep your skirt down."

"What Mark Robinson said is despicable," the woman says, adding that "Mark Robinson's extreme abortion ban will absolutely put women at risk."

Trump endorsed Robinson months ago, calling him Martin Luther King Jr. "on steroids." They've appeared together numerous times in recent years — but now haven't shared a stage in over a month. Asked Thursday if he would rescind his endorsement in the wake of CNN's report, Trump said: "I don't know the situation."

#### **MORE ON THIS**

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**Trump's Impulse After Robinson Bombshell Report: Ignore, and Power Through**



**Robinson offers 'complete cooperation and full transparency' in probe of porn-comments report**



LOCAL NEWS

# Mark Robinson lawsuit: Here's why the dollar amount decreased

Lieutenant Governor Mark Robinson is still aiming to sue defendants for \$50 million but under state legislature, the dollar amount received is up to a jury.



Author: Nixon Norman  
Published: 4:42 PM EDT October 22, 2024  
Updated: 10:34 PM EDT October 22, 2024



GREENSBORO, N.C. — There's a new twist in Lieutenant Governor Mark Robinson's lawsuit against CNN and a Guilford County man who made a music video about him.

Instead of seeking \$50 million in damages, Robinson is now asking for \$25,000 from each defendant.

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EXPLORE



While it looks like a major drop off, it's actually just procedural.

WFMY News 2's Nixon Norman spoke to a Greensboro attorney and a rep with Robinson's campaign about the stark difference in numbers.

Robinson still wants to sue CNN and other defendants for \$50 million but ultimately it's up to a jury on how much money he will actually see.

Greensboro lawyer Fred Berry said that could mean Robinson walks away with \$50 million, nothing, or something in between.

But procedurally, Robinson has to claim that he will sue for \$25,000 under state legislature. Berry said this is to protect the defendant.

**RELATED: Judge to hear Louis Love Money's motion to dismiss Lt. Gov. Robinson lawsuit in November**

"I think the mindset is to protect somebody from begin victimized by headline grabbing lawsuits, if there's not legitimacy in the lawsuit. I think it's a reputation protecting device so that somebody isn't perceived as being a great, big evil doer just on allegations," Berry said. "If this case goes to trial, and most cases don't go to trial but if this case goes to trial, it would be up to the jury to decide whether Mark Robinson was entitled to \$50 million and they might decide he's entitled to anything... who knows."

Matt Hurley, senior advisor with Robinson's campaign said he has no doubt the jury will hear Robinson and this case out even though he said no amount of money will ever truly fix this situation for Robinson.

"The reality of it is, there is no monetary value that will ever fix this, right? I mean, this is a high-tech lynching designed to affect the outcome of an election. It's not about the money for mark and it wasn't about the money for the people who perpetrated this either. You know, for them, this is a priceless intervention in an election that's you know, going to effect not just the state of North Carolina but potentially the nation for decades to come," Hurley said.



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Hurley said in the amended lawsuit there are six new discoveries claiming that CNN did not fully fact check or disclose of certain things, further painting Robinson in a bad light.

"We expect there to be numerous amendments, potentially the addition of new defendants. You know, the investigation is ongoing but the people deserve, the people of North Carolina deserve answers on as much of this as possible prior to Election Day. We are very confident that when the jury sees this additional evidence as well as all the evidence that is to be brought forward during the case, you know, they could end up awarding damages far in excess of the initial \$50 million dollars," Hurley said.

Hurley said these new discoveries are directly related to the alleged sexist and racist comments Robinson made on an adult website over a decade ago, alleged comments that were revealed in that CNN report.

**RELATED:** Mark Robinson announces lawsuit after CNN report

#### Lt. Gov. Mark Robinson addresses state of the governor's race



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# **EXHIBIT 23**

NORTH CAROLINA  
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

24 CV 032897-910

MARK KEITH ROBINSON, )  
 )  
 *Plaintiff,* )  
 )  
 v. )  
 )  
 CABLE NEWS NETWORK, INC., )  
 )  
 LOUIS LOVE MONEY, )  
 )  
 *Defendants.* )  
 \_\_\_\_\_ )

AMENDED COMPLAINT

Demand for a Jury Trial

1. CNN and Louis Love Money are responsible for a new low in digital lynching. In a malicious hit job so well timed as to be *uncanny*, they have published disgusting lies about Lieutenant Governor Mark Robinson in what appears to be a coordinated attack aimed at derailing his campaign for governor, and has already inflicted immeasurable harm to his family, his reputation, and his good name. This lawsuit, while utterly insufficient to right this wrong, shall serve as a small measure of accountability.

Parties

2. Lieutenant Governor Mark Keith Robinson (“Lt. Gov. Robinson”) is an individual who is a resident and citizen of North Carolina and maintains his office at the Hawkins-Hartness House at 310 North Blount Street, Raleigh for his work as the

Lieutenant Governor. He is the first black man to hold that title in North Carolina and is the Republican candidate for governor of North Carolina.

3. Defendant Cable News Network, Inc. (“CNN”) is a Delaware corporation, with its headquarters in Georgia. CNN purports itself to be “The Most Trusted Name in News” and is one of the world’s most well-recognized media companies. CNN’s broad network of television, website, social media accounts, and digital networks reaches millions of people in North Carolina. CNN has a bureau in Charlotte, North Carolina, is registered with the North Carolina Secretary of State as a foreign corporation authorized to do business in North Carolina, and maintains a registered agent in Raleigh, North Carolina.

4. Defendant Louis Love Money (“Money”) is an individual who is a resident and citizen of North Carolina and resides in Guilford County. He is 52 years old, sings in a local punk rock band called Trailer Park Orchestra, and appears to have changed his name from Louis Alen Wooten.

#### **Jurisdiction & Venue**

5. This Court has subject matter jurisdiction over this cause of action pursuant to North Carolina General Statutes § 1-75.4.

6. This Court has personal jurisdiction because Defendants transmitted their statements into North Carolina, relied on North Carolina sources, the statements, evidenced by their focus on the current Lieutenant Governor of North Carolina and candidate for Governor of North Carolina, focused on North Carolina with the intent that the statements’ impact would be felt in North Carolina, Lt. Gov.

Robinson felt the harm of Defendants' statements in North Carolina, and personal jurisdiction is consistent with the North Carolina Long Arm Statute, N.C. Gen. Stat. § 1-75.4. Further, Defendant Money lives in North Carolina.

7. Venue for this action is properly in Wake County, North Carolina, pursuant to North Carolina General Statutes § 1-82.

### The Defamatory Statements

8. On August 11, 2024, Defendant Money released a music video on YouTube—his band's first in three years—titled "The Lt. Governor Owes Me Money" (the "Music Video"). In the Music Video, a man in a suit, wearing a generic rubber mask of a black man, intended to depict Lt. Gov. Robinson, enters a pornography video store to view and purchase pornographic videos. In the Music Video, Defendant Money repeatedly addresses the song to "Mark" and to "Mr. Robinson," further identifying the subject as the "first black man" to hold the title of lieutenant governor. The lyrics of the song falsely accuse Lt. Gov. Robinson of owing money for a "bootleg" porn video that Defendant Money supposedly produced for him, which is the basis for the song's title.

9. *Within weeks* of this then-obscure, barely-viewed Music Video being published, Defendant Money was interviewed by a major online publication with links to George Soros, The Assembly. This resulted in an article published on September 3, 2024, titled "Ex-Porn Shop Employees Say Mark Robinson Was A Regular. He Denies It." (the "Assembly Article"). In the Assembly Article, Defendant Money falsely alleges that in the 1990s and early 2000s—when Lt. Gov. Robinson

was already a married father of two children—Robinson was a “frequent customer” at a pornographic video store where Money worked. According to Defendant Money’s outrageously false allegations, Lt. Gov. Robinson, for “several years,” hung out at the X-rated video store “five nights a week”—sometimes until 4:00 a.m.—“spending a good amount of money,” paying \$8 per video to preview “two or more” porn videos a night in a private booth, and purchasing “hundreds” of “bootleg” porn videos for \$20–\$25 a piece. According to Defendant Money, these bootleg videos were “super hardcore” and compiled from videos too risqué or extreme to sell in North Carolina. Echoing his false allegations from the Music Video, Defendant Money once again claims that Lt. Gov. Robinson owes him money for one of these bootleg porn videos.

10. These false allegations from the Music Video and the Assembly Article are hereinafter referred to collectively as the “Defendant Money Defamatory Statements.”

11. *Sixteen days after the Assembly Article*, CNN published an article, salaciously titled “I’m a black NAZI!: NC GOP nominee for governor made dozens of disturbing comments on porn forum” (the “CNN Article”). In the CNN Article, CNN falsely attributes statements allegedly made on a pornographic website, NudeAfrica.com, under the username “minisoldr” as being authored by Lt. Gov. Robinson. These falsely attributed statements include several lewd, sex-obsessed, racist, and outrageous statements, including the comment from the title of the article, “I’m a black NAZI!” CNN claims that these statements are only a “selection” and a “small portion” of graphic statements it attributes to Lt. Gov. Robinson from the

NudeAfrica website, suggesting that the withheld statements are even more obscene than those included in the CNN Article. The CNN Article also falsely claims that Lt. Gov. Robinson, as a married man, created an account on AdultFriendFinder.com, which is a website used to find sexual partners.

These false statements from the CNN Article are hereinafter referred to as the CNN Defamatory Statements.

### **Factual Background**

#### **Background of Lieutenant Governor Robinson**

---

12. Mark Robinson is the father of two grown children, and husband of 34 years to his wife Yolanda. He is the lieutenant governor of North Carolina—the first black man to hold this position. He is the Republican candidate for governor. He is a community leader and passionate advocate for education and Constitutional rights. He is a role model. But this was all hard-fought. He had to lift himself out of poverty and out of bankruptcy. He overcame growing up with an abusive, alcoholic father, and stints in foster care. He was the first in his family to graduate from college.

13. CNN and Louis Love Money, in their cynical and malicious smears, are trying to tear him down and take away all that he has achieved by portraying him as something he is not.

14. After graduating high school, Mark Robinson joined the Army Reserve and served until 1993, when he was honorably discharged.

15. In the 1990s, Mark Robinson was a young father, struggling to provide for his family. During this period, he worked at Papa John's pizza, eventually being

promoted to manager, where he sometimes managed the closing shift. Nearby was an adult video store where Defendant Money worked. Lt. Gov. Robinson, who has always been a gregarious, outgoing person, made friends with Defendant Money, who also worked the night shift. He would occasionally bring over free pizza and socialize. More often, however, Defendant Money would come over to the Papa John's, looking for free or discounted pizza.

16. Contrary to the portrayal by Defendant Money, Lt. Gov. Robinson was not spending hours at the video store, five nights a week. He was not renting or previewing videos, and he did not purchase "bootleg" or other videos from Defendant Money. When Robinson managed the closing shift, usually closing at around midnight, he went home after work so that he could wake up at a reasonable hour and spend time with his wife and two young children. Robinson stopped working at Papa John's in or about early 2001, and from then until 2022 he never saw Defendant Money again.

17. After Papa John's, Robinson worked for various manufacturing companies, including Hayco, an aircraft manufacturer.

18. Lt. Gov. Robinson was an early adopter of Facebook. He joined in 2007, and he has maintained an unlocked, public account since then. He was also an active user, getting into heated political and social debates, with other Facebook users from those early days. Against the advice of many, he never deleted his history or made the account private. He believes in transparency. Even though his views have changed over the course of 17 years, as a public servant, Lt. Gov. Robinson believes

that North Carolina voters have the right to know what he has said in the past, and—critically to this lawsuit—what he has *not*.

19. In 2018, Lt. Gov. Robinson started a new chapter in his life, bursting onto the political scene as a complete outsider. He showed up to a city council meeting as a concerned citizen, because they were debating whether to cancel a gun show in the wake of a horrific school shooting in Parkland, Florida. He stood in line to speak his mind in defense of the Second Amendment and did so in a passionate speech that went viral on the internet.

20. From there, Lt. Gov. Robinson became far more interested and involved in politics. He became active in the Guilford County GOP, started giving speeches to organizations like the National Rifle Association, and in 2020 he threw his hat in the ring for lieutenant governor of North Carolina. To the surprise of many, including himself, he won.

21. As lieutenant governor, Robinson has been a tireless leader, helping to improve quality and access to education in North Carolina. He has been a fierce advocate for supporting North Carolina families, and pro-life initiatives. Currently, he is leading the effort to provide disaster relief to North Carolinians whose homes and livelihoods have been destroyed by Hurricane Helene.

*Defendant Money spins a defamatory fantasy*

---

22. In 2022, Lt. Gov. Robinson was at Planet Fitness for his routine workout when he heard a friendly greeting. It was Defendant Money. Lt. Gov. Robinson recognized him but couldn't place him at the time. They had a pleasant conversation

that consisted mostly of Defendant Money saying how proud he was of Mark, and that it was great to see a regular, working-class guy succeed in politics. There was no talk about bootleg videos or Lt. Gov. Robinson owing him any money. Defendant Money asked for a photo with the lieutenant governor, and that was the end of the encounter.

23. Lt. Gov. Robinson didn't give this a second thought. He was regularly recognized for his public role, and he was always happy to speak with and take photos with constituents and acquaintances. Unknown to the lieutenant governor, however, Defendant Money would later use this encounter and their prior, passing acquaintance against him in a fantasy, concocted by Money to embarrass and tear him down, and to seek his own fifteen minutes of fame.

24. In August 2024, Defendant Money released the Music Video, as described above. Initially, it was seen by very few people. Within weeks, however, Defendant Money sat for an interview with The Assembly, a publication with ties to George Soros. The Assembly Article was viewed by tens of thousands of people, which also raised the profile of the Music Video, causing thousands of people to view and share it online.

25. While Defendant Money describes the song in the Assembly interview as a harmless "inside joke," the entire premise of the Music Video is not a joke, but a deliberate lie. Moreover, the Music Video was intended to be understood as fact, not as hyperbole or exaggeration. Defendant Money admits this in the Assembly Article.

26. Defendant Money spins his fantasy to even greater heights of falsity and depravity in the Assembly interview by claiming that Lt. Gov. Robinson—then a financially struggling, married father of two young children—was spending *every night* after work, for *hours* at a time—even until 4:00 a.m.—hanging out at an adult video store, and spending *thousands of dollars* on “hardcore,” bootleg porn videos—some too risqué or explicit to sell in the state of North Carolina—and on private booth previews. Every bit of this is knowingly false, but Defendant Money uses his selfie with Lt. Gov. Robinson in 2022, and his fellow porn store friends as supposed corroboration.

27. Defendant Money appears to take great pleasure from the publicity he is receiving from these lies. In a subsequent YouTube video, Defendant Money gloats over the publicity he has gotten and *thanks* Lt. Gov. Robinson for denying the story. In his X bio, he now describes himself as “the most famous former porn clerk in the world!”

28. Defendant Money tacitly admits that his story was timed to coincide with the election and cause Lt. Gov. Robinson maximum damage, saying “I’m glad I waited” to make the Music Video. He even posts memes on X suggesting that his Music Video “saved” young women by derailing the candidacy of a Republican, pro-life governor.

*CNN piles on with its own impeccably timed and recklessly false hit piece*

29. Prior to publication of the CNN Article, CNN reached out to Lt. Gov. Robinson. He specifically and unequivocally denied CNN’s allegations that he used

or created the “minisoldr” NudeAfrica profile or made any of those statements. He told CNN that it was entirely manufactured. CNN did not give Lt. Gov. Robinson any opportunity to inspect or investigate any of the source material for these alleged statements.

30. CNN, despite Lt. Gov. Robinson’s explicit denials, chose to publish the CNN Article based on data from a dubious and vulnerable website, supposed corroboration from unverified—indeed, *unverifiable*—data, apparently sourced from hacked, data breach files, obtained from the dark web. It chose to publish despite knowing or recklessly disregarding that Lt. Gov. Robinson’s data—including his name, date of birth, passwords, and the email address supposedly associated with the NudeAfrica account—were previously compromised by multiple data breaches. Any person could have purchased and/or used Lt. Gov. Robinson’s data to create accounts all over the internet. As CNN is aware, people who create accounts on websites like NudeAfrica, and AdultFriendFinder prefer *not* to use their own names and identities for obvious reasons.

31. CNN did nothing to verify the posts from NudeAfrica. Indeed, CNN did not even contact the owner of NudeAfrica prior to publishing the CNN Article.

32. CNN either knew or recklessly disregarded the fact that the NudeAfrica website used outdated and highly vulnerable software, easily exploited to plant malicious lies. Indeed, CNN either knew or recklessly disregarded the fact that the NudeAfrica website was hacked in 2018 and appears to use the same vulnerable software it used at the time it was hacked.

33. CNN either knew or recklessly disregarded that NudeAfrica uses Discus Pro 4.10.1 as its website forum software, which was released 18 years ago, and is highly vulnerable to exploitation and manipulation, including but not limited to direct database manipulation, user impersonation, thread integration, timestamp manipulation, content generation, and log manipulation.

34. CNN either knew or recklessly disregarded that the NudeAfrica forum uses Perl 5.016003, an outdated scripting language which is beyond its end-of-life, has not received security updates in almost 10 years, and is commonly known to be vulnerable to remote code execution and security bypass exploitations.

35. CNN either knew or recklessly disregarded that the NudeAfrica forum is obviously vulnerable to manipulation, and that a hacker with rudimentary skills could create, backdate, and integrate forum posts and user accounts on NudeAfrica such as the ones CNN attributed to Lt. Gov. Robinson in the CNN Article.

36. The CNN Article includes reference to Defendant Money's allegations as reported in the Assembly Article, provides a link to the Assembly Article, and notes Lt. Gov. Robinson's denial. This re-reporting by CNN expanded the reach of Defendant Money's Defamatory Statements even further.

37. On October 1, 2024, Lt. Gov. Robinson, by counsel, sent a retraction demand to CNN. Two days later, on October 3, 2024, Lt. Gov. Robinson further demanded that CNN produce the source material for its bogus allegations so that it could be subjected to forensic scrutiny and verification. CNN responded the next day,

refusing to retract the article and has still declined to produce any of its source material for inspection.

38. Almost immediately after the CNN Article broke, the NudeAfrica website owner *shut down* the forum section of its website, where these alleged posts were supposedly archived. It then *deleted* all messages from minisoldr, thereby removing evidence that could be investigated.

39. CNN had every reason to doubt the veracity of the data upon which it relied. CNN knew that supposed archives from a suspicious and highly vulnerable website like NudeAfrica were unreliable and failed to meaningfully investigate or digitally scrutinize them. CNN knew that supposedly corroborating information it used was from unverifiable, dark web-sourced data breach files. CNN knew or recklessly disregarded the fact that Lt. Gov. Robinson's email, passwords, and personal data had been stolen. CNN knew that Lt. Gov. Robinson's facebook history, which is unlocked and transparent to all, goes back to 2007. CNN knew that just weeks prior to its article, Lt. Gov. Robinson had been targeted by another ludicrous and dubiously sourced hit piece by The Assembly. CNN knew that the election was less than two months away.

40. With all that knowledge, rather than conduct any kind of serious investigation or digital forensics on these supposedly decade-old posts, or even question the timing for their surfacing all-of-a-sudden, CNN recklessly proceeded to attribute them to Lt. Gov. Robinson. It disregarded or deliberately avoided the truth, fully intending to derail Lt. Gov. Robinson's political career. CNN's continued failure

to produce any source material and their utter incuriosity over the veracity of their source material are telling on this point.

41. CNN—a politically left-wing media outlet, whose reporting is often indistinguishable from Democrat party talking points and opposes politically conservative candidates for office, including Lt. Gov. Robinson—intended to damage Lt. Gov. Robinson’s gubernatorial run. CNN published the CNN Article and attributed the “minisoldr” posts to Lt. Gov. Robinson despite harboring doubt over the veracity and verifiability of the supposedly supporting information and deliberately avoided the truth.

42. Lt. Gov. Robinson can never be fully compensated for the damage done by Defendants’ lies. His private and public lives have been devastated. Friends and family have turned their backs on him. He has been humiliated. It is therefore imperative that CNN, Money, and anyone else involved, be held fully accountable, not just to mitigate the harm they have done, but to vindicate Lt. Gov. Robinson and allow him to begin the healing process.

### COUNT I

#### Defamation and Defamation *per se* against Defendant Money

43. Lt. Gov. Robinson realleges and incorporates paragraphs 1 through 42 above.

44. Defendant Money’s Defamatory Statements are knowingly false.

45. Defendant Money published his Defamatory Statements to thousands of people on the internet, via YouTube, X, and by giving an interview to The Assembly.

Defendant Money's lies, as intended by Defendant, have been reposted and reshared online to thousands more.

46. Defendant Money's Defamatory Statements are reasonably understood to be statements of fact, rather than hyperbole or opinion, as demonstrated not only by the language used by Defendant, but by the reactions and comments of hundreds of individuals who responded to and reposted Defendant's statements.

47. Defendant Money's Defamatory Statements have directly and proximately caused Lt. Gov. Robinson to suffer significant damages, including direct damages, damages to his reputation, public disgrace, humiliation, embarrassment, mental anguish, distress, and anxiety, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant Money.

48. Defendant Money, therefore, is liable for compensatory damages.

49. Defendant Money is also liable for punitive damages because of the wanton and outrageous nature of the defamation and Defendant Money's actual malice.

50. Defendant Money's Defamatory Statements are also defamatory *per se* because they subject Lt. Gov. Robinson to ridicule, contempt, and disgrace.

51. Defendant Money acted with actual malice and reckless disregard for the truth, as demonstrated by Defendant's extreme antipathy, ill-will, and desire to inflict harm on Lt. Gov. Robinson, his blatant fabrications, and his actual knowledge of the falsity of his statements.

**COUNT II**  
**Defamation and Defamation *per se* against Defendant CNN**

52. Lt. Gov. Robinson realleges and incorporates paragraphs 1 through 42 above.

53. CNN's Defamatory Statements are recklessly false.

54. Defendant CNN published its Defamatory Statements to hundreds of thousands of people on the internet, via its website and social media networks. Defendant CNN's Defamatory Statements, as intended by CNN, have been reposted and reshared online to thousands more.

55. Defendant CNN's Defamatory Statements are reasonably understood to be statements of fact because they are reported in a news article which purports to report facts.

56. Defendant CNN's Defamatory Statements have directly and proximately caused Lt. Gov. Robinson to suffer significant damages, including direct damages, damages to his reputation, public disgrace, humiliation, embarrassment, mental anguish, distress, and anxiety, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant CNN.

57. Defendant CNN, therefore, is liable for compensatory damages.

58. Defendant CNN is also liable for punitive damages because of the wanton and outrageous nature of the defamation and Defendant CNN's actual malice.

59. Defendant CNN's Defamatory Statements are also defamatory *per se* because they subject Lt. Gov. Robinson to ridicule, contempt, and disgrace.

60. Defendant CNN acted with actual malice and reckless disregard for the truth, as demonstrated by Defendant's antipathy, ill-will, and desire to inflict harm on Lt. Gov. Robinson, CNN's actual knowledge of the dubious nature and timing of the allegations, its use of unverifiable data to corroborate its reporting, its reckless failure to investigate, and its knowledge of exculpatory information and alternative explanations that it deliberately omitted from the CNN Article.

**Prayer for Relief**

WHEREFORE, Plaintiff Mark Robinson demands judgment against Defendants as follows:

- a. An award of compensatory, special, and punitive damages, as well as disgorgement of any and all income Defendants have made off of their lies about Mark Robinson, in an amount to be proven at trial, in excess of twenty-five thousand dollars (\$25,000.00);
- b. An award of Plaintiff's costs associated with this action; and
- c. Such other and further relief as the Court deems just and appropriate to protect Plaintiff's rights and interests.

**Demand for Jury Trial**

Plaintiff demands a trial by jury on all issues so triable.

Dated: October 18, 2024

MARK ROBINSON  
*By Counsel*

Respectfully submitted,

/s/ Anthony J. Biller  
Anthony J. Biller (NCB No. 24,117)  
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Jesse R. Binnall  
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jason@binnall.com

*Counsel for Plaintiff*

# **EXHIBIT 24**

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

MARK KEITH ROBINSON,

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

LOUIS LOVE MONEY,

Defendants.

GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

Case No. 24CV032897-910

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the **AMENDED COMPLAINT**, in the above referenced case, was served on the following parties to this action by:

(x) US Mail to:

Cable News Network, Inc.  
Registered Agent:  
CT Corporation Services  
160 Mine Lake Ct., Suite 200  
Raleigh, NC 27615

Respectfully submitted, this 21st day of October 2024.

/s/Anthony J. Biller

Anthony Biller (NC Bar No. 24117)  
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/s/Jason C. Greaves

Jason C. Greaves (VA Bar No. 86164)  
(*pro hac vice pending*)  
Jesse Binnall (VA Bar No. 79292)  
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Email: [jesse@binnall.com](mailto:jesse@binnall.com)

# **EXHIBIT 25**

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

MARK KEITH ROBINSON,

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

LOUIS LOVE MONEY,

Defendants.

GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

Case No. 24CV032897-910

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the **AMENDED COMPLAINT**, in the above referenced case, was served on the following parties to this action by:

(x) electronic mail to:

Andy L. Fitzgerald  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
D. Stuart Punger, Jr.  
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*Attorneys for Louis Love Money*

Respectfully submitted, this 22nd day of October 2024.

/s/Anthony J. Biller  
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/s/Jason C. Greaves  
Jason C. Greaves (VA Bar No. 86164)  
*(pro hac vice)*  
Jesse Binnall (VA Bar No. 79292)  
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# **EXHIBIT 26**

**STATE OF NORTH CAROLINA  
COUNTY OF WAKE**

**MARK KEITH ROBINSON,**

**Plaintiff,**

**vs.**

**CABLE NEWS NETWORK, INC.,**

**LOUIS LOVE MONEY,**

**Defendants.**

**GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION**

**Case No. 24CV032897-910**

**MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DEFENDANT LOUIS  
LOVE MONEY'S DISCOVERY  
REQUESTS**

Plaintiff Mark Keith Robinson by and through the undersigned counsel, and for good cause moves this Court pursuant to Rule 6(b) of the North Carolina Rules of Civil Procedure for an extension of time to respond to Defendant Louis Love Money's First Set of Interrogatories and Requests for Production of Documents to Plaintiff, specifically for an additional thirty (30) days from November 22, 2024 up to and including December 22, 2024.

In support hereof, Plaintiff respectfully shows this Court that he was served Defendant Louis Love Money's First Set of Interrogatories and Requests for Production of Documents to Plaintiff on October 23, 2024. The time for responding has not yet expired. Plaintiff requires additional time to formulate and serve Discovery Responses. This is Plaintiff's first extension request. Plaintiff moves this Court for a thirty (30) day extension for responses to the Discovery Requests to allow adequate time in which to prepare responses.

WHEREFORE, Plaintiff, respectfully prays this Court extends the time to respond by thirty (30) days from and after November 22, 2024, up to and including December 22, 2024.

Respectfully submitted this the 31st day of October 2024.

/s/Anthony J. Biller

Anthony Biller (NC Bar No. 24117)

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/s/Jason C. Greaves

Jason C. Greaves (VA Bar No. 86164)

*(pro hac vice)*

Jesse Binnall (VA Bar No. 79292)

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**CERTIFICATE OF SERVICE**

The undersigned attorneys hereby certify that a copy of the **MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT LOUIS LOVE MONEY'S DISCOVERY REQUESTS**, in the above referenced case, was served upon all parties to this action, (x) through North Carolina EFile & Serve system:

Andy L. Fitzgerald  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
D. Stuart Pungler, Jr.  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)  
Peter D. Zellmer  
[Peter.Zellmer@Zellmerlegal.com](mailto:Peter.Zellmer@Zellmerlegal.com)  
*Attorneys for Louis Love Money*

( x) by depositing a copy in the U.S. Mail, first-class, postage prepaid to:

Cable News Network, Inc.  
Registered Agent  
CT Corporation Services  
160 Mine Lake Ct., Suite 200  
Raleigh, NC 27615

/s/ Anthony J. Biller

# **EXHIBIT 27**

STATE OF NORTH CAROLINA BY: O. Barbour GENERAL COURT OF JUSTICE  
COUNTY OF WAKE SUPERIOR COURT DIVISION

**MARK KEITH ROBINSON,**

**Case No. 24CV032897-910**

**Plaintiff,**

**vs.**

**CABLE NEWS NETWORK, INC.,**

**ORDER FOR EXTENSION OF TIME TO  
RESPOND TO DEFENDANT LOUIS  
LOVE MONEY'S DISCOVERY  
REQUESTS**

**LOUIS LOVE MONEY,**

**Defendants.**

Upon motion of Plaintiff Mark Keith Robinson, for an extension of time to respond to Defendant Louis Love Money's First Set of Interrogatories and Requests for Production of Documents to Plaintiff, pursuant to Rule 6(b) of the North Carolina Rules of Civil Procedure, and Plaintiff having presented good cause, the foregoing motion is granted.

IT IS HEREBY ORDERED that Plaintiff will have through and including December 22, 2024, within which to answer or otherwise respond to Defendant Louis Love Money's First Set of Interrogatories and Requests for Production of Documents to Plaintiff.

**11/1/2024 3:46:00 PM**

This the \_\_\_\_\_ day of November, 2024.



\_\_\_\_\_  
Clerk of Superior Court