UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND GREENBELT DIVISION

Brett Kimberlin No. PWG 13 3059 Plaintiff, Vs. National Bloggers Club, DEC 1 8 2013 Ali Akbar, Patrick Frey, AT GREENBELT CLERK U.S. DISTRICT COURT DISTRICT OF MARYLAND Erick Erickson, NIGHT DEPOSIT BOX Michelle Malkin, Glenn Beck, Aaron Walker, William Hoge, Lee Stranahan, Robert Stacy McCain, James O'Keefe, Breitbart.com, DB Capitol Strategies, The Franklin Center, Simon & Schuster, Inc., Kimberlin Unmasked, Mercury Radio Arts. The Blaze, Ace of Spades, RedState, Defendant(s)

Defendant The Franklin Center for Government and Public Integrity Motion to Dismiss in Lieu of Answer to Complaint

Now comes the defendant FRANKLIN CENTER FOR GOVERNMENT AND PUBLIC INTEGRITY, pursuant to Federal Rules of Civil Procedure 12(b)(6), defendant hereby respectfully moves this Court to dismiss the above-captioned action for lack of subject matter

jurisdiction and for failure to state a claim upon which relief may be granted, for the reasons set forth in the accompanying memorandum in support of this motion.

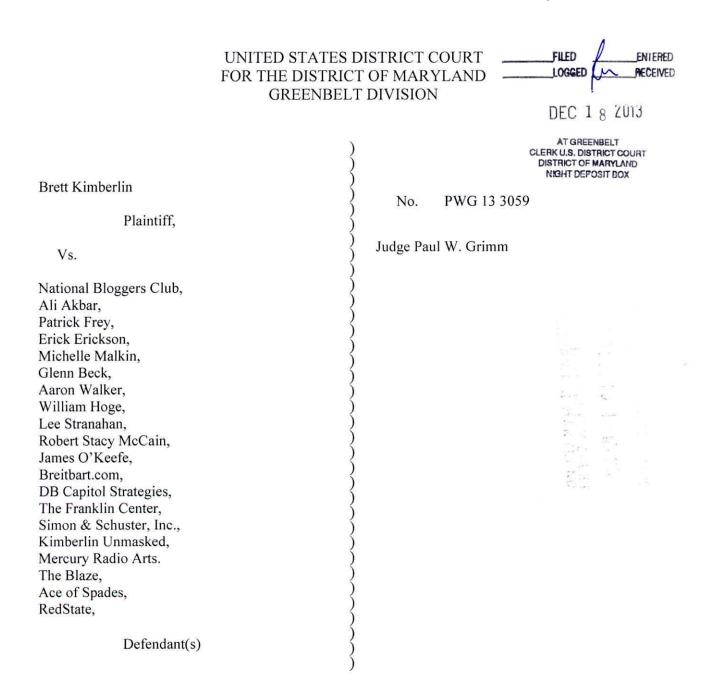
December 17, 2013

Respectfully Submitted,

_____/s/__ LINDA S. MERICLE, Esq. Linda S. Mericle, P.A. 7600 Hanover Parkway, Ste. 202 Greenbelt, MD 20905 Federal Bar #:09685

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Defendant Franklin Center for Government and Public Integrity Memorandum in Support of Motion to Dismiss in Lieu of Answer

INTRODUCTION

On October 17, 2013 Plaintiff Brett Kimberlin filed the above captioned lawsuit naming The Franklin Center for Government and Public Integrity (hereinafter "FCGPI") as a defendant.

On October 24, 2013, Franklin Center received an unstamped copy of complaint and a waiver of

service process. Franklin Center waived service of process via certified mail within the time allowed under the Federal Rules of Civil Procedure. FGCPI is a 501c3 non-profit news organization engaged in investigative journalism. FGCPI also provides training for journalists. Outside of establishing parties to the suit, Plaintiff Kimberlin only refers to Defendant FCGPI once in the entire complaint related to a press release issued on June 26, 2012. (Amended Complaint, ¶ 95.) Defendant FCGPI is never mentioned anywhere else.

STANDARD OF REVIEW

Federal Rule of Civil Procedure 12(b)(6) provides that a party may move to dismiss a complaint for failure to state a claim upon which relief may be granted. In considering a motion to dismiss, the pleadings are construed in the light most favorable to the nonmoving party, and the facts alleged in the complaint must be taken as true. Hamm v. Groose, 15 F.3d 110, 112 (85th Cir. 1994), Ossman v. Diana Corp., 825 Supp. 870 (D.Minn. 1993). Any ambiguities concerning the sufficiency of the claims must be resolved in favor of the nonmoving party. Ossman, 825 F.Supp. at 880. Federal Rule of Civil Procedure states the pleadings "shall contain a short and plain statement of the claim showing that the pleader is entitled to relief". A pleading must contain "enough facts to state a claim to relief that is plausible on its face." Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007). Though the Twombly standard requires only a short and plain statement, "[f]actual allegations must be enough to raise a right to relief above the speculative level." Id. Federal Rules of Procedure Rule 12(b)(6) provides that a complaint may be dismissed "if it is clear that no relief could be granted under any set of facts that could be proved consistent with the allegations." Hishon v. King & Spalding, 467 U.S. 69, 73 (1984). A satisfactory claim for relief "demand[s] more than an unadorned, the-defendant-unlawfullyharmed-me accusation." Ashcroft v. Igbal, 556 U.S. 662, 678 (2009). A complaint is subject to

dismissal under Rule 12(b)(6) if it merely "offers labels and conclusions or a formulaic recitation of the elements of a cause of action... [or] if it tenders naked assertions devoid of further factual enhancement." *Id*.

ARGUMENT

I. Plaintiff fail to allege facts necessary to show conduct, an enterprise, and racketeering activity under 18 U.S.C. §1962(c)-(d).

The Plaintiff's first claim for relief should be dismissed because the Plaintiff failed to allege the facts necessary to show defendant FGCPI engaged in conduct, enterprise, and racketeering activity under 18 U.S.C. §1962(c)-(d). Without naming FCGPI (or any other defendants) specifically, Plaintiff alleges Defendant(s) generally, engaged in racketeering activity under the federal statute. To state a claim under §1962(c), a plaintiff must allege, "...(1) conduct (2) of an enterprise (3) through a pattern (4) of racketeering activity." Sedima v. Imrex Co., 473 U.S. 479, 496 (1985). As the Court discussed in Sedima, conduct is the "conducting or participating in the conduct of an enterprise through a pattern of racketeering activity." Id. Pursuant to 18 U.S.C. §1961, an enterprise is "any individual, partnership, corporation, association, or other legal entity, and any union or group of individuals associated in fact although not a legal entity." 18 U.S.C. §1961. Racketeering activity is any act "chargeable" under several generically described state criminal laws, any act "indictable" under numerous specific federal criminal provisions, including mail and wire fraud, and any "offense" involving bankruptcy or securities fraud or drug-related activities that is "punishable" under federal law. 18 U.S.C. §1961(1). Finally, a pattern of racketeering requires "at least two acts of racketeering activity." 18 U.S.C. §1961.

The Plaintiff's first claim for relief should be dismissed because the Plaintiff failed to show any of the elements of the 18 U.S.C. §1961 claim. The only conduct alleged by Plaintiff was the publication of a single press release by FCGPI informing possible participants about a seminar. (Amended Complaint ¶ 95., "Franklin Center Joins Lee Stranahan, Popehat, Aaron Walker, Mandy Nagy And Others To Discuss Protection Of The Free Press - See more at: http://franklincenterhq.org/5833/franklin-center-joins-lee-stranahan-popehat-aaron-walker-mandy-nagy-and-others-to-discuss-protection-of-the-free-press/" Hereto attached as "Exhibit A"). This single press release and webinar is insufficient to implicate conduct in racketeering activity. The Amended Complaint fails to identify any conduct that would constitute "racketeering" under the applicable standard, or conduct chargeable under a criminal statute, let alone a pattern of such racketeering activity. These facts are insufficient to state a claim under 18 U.S.C. 1962(c), and, as such, Plaintiff's first claim should be dismissed.

II. Plaintiff failed to state a claim against FCGPI under 42 U.S.C. §1983

Plaintiff's second claim for relief should be dismissed because Plaintiff failed to state a claim under 42 U.S.C. §1983 against FGCPI. In his complaint, the Plaintiff's only allegation under 42 U.S.C. §1983 is against Defendant Patrick Frey (Amended Complaint, ¶¶154-160). FCGPI is nowhere implicated, therefor his second claim against FCGPI should be dismissed.

III. Plaintiff failed to allege sufficient facts to support a claim under 42 U.S.C. §1985(2)-(3)

The Plaintiff's third claim for relief should be dismissed because the Plaintiff has failed to allege sufficient facts to support a claim on either 42 U.S.C. §1985(2) or (3).

A. Plaintiff fails to state a claim under 42 U.S.C. §1985(2)

Plaintiff claims FCGPI violated 42 U.C.S. §1985(2). (Amended Complaint, ¶¶162-166). Under 42 U.S.C. §1985(2), it is unlawful to obstruct justice, intimidate a party, witness, or juror. To demonstrate a valid §1985(2) claim, a plaintiff must show: (1) a conspiracy between two or more persons and (2) to deter witness by force, intimidation or threat from attending court or testifying freely in any pending matter, which (3) results in injury to plaintiff. Haigh v. Matsushita Electric Corp., 676 F. Supp. 1332, 1343 (E.D. Va. 1987). A conspiracy "has not been stated" where "plaintiffs have not alleged a conspiracy between defendant and any other person or entity." Lamont v. Forman Bros., Inc., 410 F. Supp. 912, 918 (D.D.C. 1976). A plaintiff must also, "...allege facts showing that defendants agreed to violate his constitutional rights," in order to prove a conspiracy under §1985(2). Clark v Maryland Dep't of Pub. Safety & Corr. Servs, 247 F. Supp. 2d 773, (D. Md. 2003). Plaintiff did not allege a conspiracy between FCGPI and any other person or entity, and did not allege facts showing that FCGPI agreed with any other person or entity to violate his constitutional rights. (Amended Complaint ¶¶ 76-79). Plaintiff has also not alleged that FCGPI, or any hypothetical conspirator, used force, intimidation or threats under §1985(2). The press release referenced in Plaintiff's Amended Complaint contains no threatening or intimidating language. (See Exhibit A). Rather, the press release merely informs potential participants of the existence of the swatting tactic, encourages them to petition the Attorney General to investigate swatting activity and informs them of the seminar and how they can protect their first amendment rights.

Plaintiff has similarly failed to state a claim under 42 U.S.C. §1985(2). The Amended Complaint provides insufficient facts to show that a conspiracy existed, that any such hypothetical conspiracy used force, intimidation or threats under §1985(2), or that any such hypothetical conspiracy deterred an unnamed, hypothetical witness from testifying freely or

attending court. As Plaintiff failed to allege facts that "raise a right to relief above the speculative level", dismissal is appropriate under the *Twombly* standard.

B. Plaintiff fails to state a claim under 42 U.S.C. §1985(3)

Plaintiff claims that FCGPI deprived him of rights or privileges under 42 U.S.C. §1985(3). A claim asserted under 42 U.S.C. §1985(3) requires the Plaintiff to show that the Defendants engaged in (1) a conspiracy; (2) for the purpose of depriving, directly or indirectly, any person or class of persons of the equal protection of the laws or of equal privileges and immunities under the laws; (3) an overt act in furtherance of the object of the conspiracy; and (4) that the plaintiff (a) was injured in his person or property, or (b) was deprived of having and exercising any right or privilege of a United States citizen. *Simmons v. Baker*, 842 F. Supp. 883, 889 (E.D. Va. 1994). Independent acts of two or more alleged wrongdoers do not constitute a conspiracy under §1985(3). *Murdaugh Volkswagon, Inc. v. First Nat'l Bank*, 639 F.2d 1073, 1075 (4th Cir. 1981).

The factual allegations in Plaintiff's Amended Complaint fail to support Plaintiff's 42 U.S.C. §1985(3) claim. As stated above, Plaintiff's allegations against FCGPI is merely that they published a press release and held a seminar (Amended Complaint, ¶95). These facts do not allege a conspiracy claim, do not allege a hypothetical conspiracy that was carried out through an overt act for the purpose of depriving Plaintiff equal protection of the laws or equal privileges and immunities under the laws, and do not allege that Plaintiff was injured or was deprived of exercising a right or privilege. As these factual allegations fail "raise a right to relief above the speculative level" under a §1985(2) claim, dismissal is appropriate under the *Twombly* standard.

IV. Plaintiff failed to state a claim for Fraud and Negligent Misrepresentation

Most of the facts alleged in the complaint are made against defendant National Bloggers Club, and not defendant FCGPI. (Amended Complaint ¶¶ 170-173). To the extent that the claim alleges fraud and negligence against FCGPI, the Plaintiff's third claim for relief should be dismissed because the Plaintiff has failed to allege sufficient facts to support a claim for neither fraud nor negligence.

A. Plaintiff failed to state a claim for Fraud

In order to support a claim for fraud, the plaintiff must show the following elements:

(1) a representation made by a party was false; (2) its falsity was either known to the party or made with such reckless indifference to the truth as to impute knowledge; (3) the misrepresentation was made for the purpose of defrauding some other person; (4) that person reasonably acted in reliance upon the misrepresentation with full belief in its truth, and he would not have done the thing from which damage resulted had it not been made; and (5) the person so acting suffered damage directly resulting from the misrepresentation. *Call Carl, Inc. v. BP Oil Corp.*, 554 F.2d 623, 629 (4th Cir. Md. 1977).

In this case, the Plaintiff has failed to allege that any of the statements made by Franklin Center were false, or that FCGPI knew that any false statements made by them, or were reckless in publishing such statements. Furthermore the Defendant has not claimed, nor can he claim that he detrimentally relied on the truth of any statement by FCGPI. He also has not demonstrated that he suffered any damage resulting upon his reliance on the truth of the misrepresentation. Therefore he has not shown the proper elements, or even that he has standing to sue under this cause of action. As Plaintiff has failed to allege a sustainable cause of action for fraud under Maryland law, this claim should be dismissed in accordance with *Twombly*.

B. Plaintiff failed to state a claim for Negligent Representation

In order to support a claim for negligent representation, the plaintiff must show the following elements:

1) the defendant, owing a duty of care to the plaintiff, negligently asserts a false statement; 2) the defendant intends that his statement will be acted upon by the plaintiff; 3) the defendant has knowledge that the plaintiff will probably rely on the statement, which, if erroneous, will cause loss or injury; 4) the plaintiff, justifiably, takes action in reliance on the statement; and 5) the plaintiff suffers damage proximately caused by the defendant's negligence. *Martens Chevrolet, Inc. v. Seney*, 292 Md. 328, 336-337, 439 A.2d 534 (Md. 1982).

Defendant FCGPI did not owe Plaintiff any duty of care. Furthermore the Defendant has not claimed, nor can he claim that he detrimentally relied on the truth of any statement by FCGPI, nor that he took any action in reliance on that statement. He also has not demonstrated that he suffered any damage resulting upon his reliance on the truth of the misrepresentation. Therefore he has not shown the proper elements, or even that he has standing to sue under this cause of action. As Plaintiff has failed to allege a sustainable cause of action for fraud under Maryland law, this claim should be dismissed in accordance with *Twombly*.

V. Plaintiff has failed to file a timely claim for Defamation; failed to state a claim

The Plaintiff's fifth claim should for relief should be dismissed because he failed to timely file this claim for relief, and is therefore barred by the statute of limitations for Defamation under Maryland law. Even if timely filed, Defendant has failed to properly state a claim.

A. Statute of Limitations

Any claim for relief for defamation is barred by statute of limitations. Under Maryland law, the statute of limitations on a claim for defamation is one-year (Md. Courts & Judicial Proc. §5-105). The alleged defamatory statements were made on June 26, 2012. (Amended Complaint ¶ 95, Exhibit A). The complaint was filed on or around October 17, 2013, which is more than one year removed from June 26, 2012. This claim is therefore barred by statute of limitations.

B. Failure to state a claim

Under Maryland law, Plaintiff's allegation of defamation per se fails to state a claim upon which relief may be granted. To assert a defamation claim, a plaintiff must show that: "(1) the defendant made a defamatory statement regarding the plaintiff to a third person; (2) the statement was false; (3) the defendant was legally at fault in making the statement; and (4) the plaintiff suffered harm thereby." S. Volkswagen, Inc. v. Centrix Fin., LLC, 357 F. Supp. 2d 837 (D. Md. 2005). Plaintiff is a public figure and is therefore further required to allege sufficient facts to show actual malice on the part of FCGPI. Dobkin v. Johns Hopkins Univ., 1996 U.S. Dist. LEXIS 6445, 45-46 (D. Md. Apr. 17, 1996). Public figures are defined as those who "thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved." Fitzgerald v. Penthouse Int'l, 525 F. Supp. 585, 588-589 (D. Md. 1981). Plaintiff is a public figure because he has had an authorized biography published about him detailing his exploits. Citizen K: The Deeply Weird American Journey of Brett Kimberlin (Singer, Mark, Knoff, New York, 1996) is an authorized biography of Plaintiff Kimberlin. In it the book insuinuates that the Plaintiff had an inappropriate relationship with a ten year old girl. (Id. at 78.), that he was suspected in having arranged a murder-for-hire of the girl's grandmother (at 82, 83), and that the subsequent Speedway Bombings were an attempt to distract the murder investigation (at. 89). Plaintiff is, in fact, admittedly the notorious "Speedway Bomber" who terrorized the town of Speedway Indiana in 1978. (Id.) Throughout Plaintiffs' incarceration, he sought the media spotlight by claiming to have sold marijuana to former Vice President Dan Quayle (at. 90-91) and sought to tell his tale through a jailhouse press conference (at 117-119.) These facts support the conclusion that Plaintiff is a public figure and must thus show actual malice by FCGPI.

As Plaintiff alleges defamation per se, he must also show that FCGPI acted with malice. Samuels v. Tschechtelin, 763 A.2d 209, 245 (Md. Ct. Spec. App. 2000). To act maliciously, Defendant must have acted with either "reckless disregard for its truth or with actual knowledge of its falsity." *Id.* at 242. Plaintiff did not allege FCGPI acted with reckless disregard for the truth of its statements nor does he allege FCGPI had actual knowledge of (alleged) falsity of the statements.

Plaintiff's sole accusation against FCGPI is that they posted a press release and held a webinar (Amended Complaint ¶ 95; Exhibit A). He failed to allege that any of the statements made in the press-release were in-fact defamatory. Even if he had stated that the statements were defamatory, He has not shown in any way that FCGPI had acted with either "reckless disregard fot its truth or with actual knowledge of its falsity". *Tschechtelin*, at 242. For this reason, Plaintiff has failed to allege a sustainable cause of action for defamation and this claim should be dismissed in accordance with *Twombly*, as well as under the failure to file the claim in a timely manner.

VI. Defendant has failed to state a claim for Invasion of Privacy False Light.

In order to state a claim for invasion of privacy, false light, in Maryland, a plaintiff must allege:

(1) that the defendant gave publicity to a matter that places the plaintiff before the public in a false light; (2) that a reasonable person would find that the false light in which the other person was placed highly offensive; and (3) that the defendant had knowledge of or acted with reckless disregard as to the falsity of the publicized matter and the false light in which the defendant placed the plaintiff. *Mazer v. Safeway, Inc.*, 398 F. Supp. 2d 412 (D. Md. 2005).

Plaintiff's Sixth Claim for Relief should be dismissed because he merely recites the elements of a false light claim (Amended Complaint, ¶197-207), fails to specifically name FCGPI, and fails

to challenge the veracity of statements made by FCGPI. Plaintiff provides only a recitation of the elements of a false light invasion of privacy claim (Amended Complaint, ¶197-207), but fails to support this claim with sufficient factual allegations. A complaint is subject to dismissal under Rule 12(b)(6) if it merely "offers labels and conclusions or a formulaic recitation of the elements of a cause of action...[or] if it tenders naked assertions devoid of further factual enhancement." Ashcroft, 556 U.S. at 678. Plaintiff also fails to challenge the actual truth and veracity of the statements made by Franklin Centerand therefore fails to state a claim for false light invasion of privacy. (Amended Complaint ¶95, ¶197-207). Under Maryland law, "[w]here the truth is so close to the facts, the court will find that no legal harm has been done." Dobkin v. Johns Hopkins Univ., 1996 U.S. Dist. LEXIS 6445, 29 (D. Md. Apr. 17, 1996). Additionally, Plaintiff fails to specifically name FCGPI in its Sixth Claim for Relief and instead names "Defendants" without any attribution to specific activity committed by FCGPI.

Plaintiff's sole accusation against FCGPI is that they posted a press release and held a webinar (Amended Complaint ¶ 95; Exhibit A). This allegation is insufficient to support a false light invasion of privacy claim because they do not allege any conduct by FCGPI that relates to the elements of a false light invasion of privacy claim. Additionally, the claim fails to meet the standards for defamation, and "[t]he Fourth Circuit, interpreting Maryland law, has refused to allow a claim for false light invasion of privacy to stand where the claim failed to meet the standards for defamation. *Dobkin v. Johns Hopkins Univ.*, 1996 U.S. Dist. LEXIS 6445, 37 (D. Md. Apr. 17, 1996); See *supra* Section V. Under *Twombly*, "[f]actual allegations must be enough to raise a right to relief above the speculative level." *Twombly*, 550 U.S. at 55. Therefore, this claim should be dismissed.

VII. The Plaintiff has failed to state a claim for Intentional Infliction of Emotional Distress

In his complaint the plaintiff merely states the elements of Intentional Infliction of Emotional distress, without pleading in any detail who has done what to cause him this emotional distress. A claim for Intentional Infliction of Emotional Distress must contain the following elements. "(1) The conduct must be intentional or reckless; (2) The conduct must be extreme and outrageous; (3) There must be a causal connection between the wrongful conduct and the emotional distress; (4) The emotional distress must be severe." *Mitchell v. Baltimore Sun Co., 164 Md. App. 497, 883 A.2d 1008, 1024* (Md. Ct. Spec. App. 2005). In addition, Maryland Courts have cautioned the use of the tort of intentional infliction of emotional distress only in cases where the defendant committed "opprobrious behavior that includes truly outrageous conduct." *Kentucky Fried Chicken Nat'l Mgmt. Co. v. Weathersby*, 607 A.2d 8, 11 (Md. 1992).

In this case the Plaintiff provides insufficient facts to allege that FCGPI's conduct was extreme or outrageous. The Amended Complaint also fails to allege a causal connection between FCGPI's conduct and the emotional distress. Plaintiff's sole accusation against FCGPI is that they posted a press release and held a webinar (Amended Complaint ¶ 95; Exhibit A). Even if true, this allegation is insufficient to support a claim for intentional infliction of emotional distress under Maryland Law. This claim should be dismissed under the *Twombly* standard.

CONCLUSION

Defendant FCGPI respectfully requests this court to dismiss Plaintiff's First, Second, Third, Fourth, Fifth, Sixth, and Seventh claims for relief under Rule 12(b)(6) of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

Defendant FCGPI, having stated its support for their motion to dismiss, prays for relief as follows:

- 1. An Order dismissing this case
- 2. An Order granting Attorney's and Costs
- 3. An Order enjoining Plaintiff from filing any frivolous and meritless lawsuits against Plaintiff without first receiving permission from the court vis-à-vis obtaining approval from a court appointed special master or by posting bond to cover fees and costs should such a claim be dismissed;
- 4. Any other such relief this court deems fit and proper.

Respectfully Submitted,

_/s/__

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Local Counsel for Defendant, The Franklin Center

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Exhibit A

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Franklin Center Joins Lee Stranahan, Popehat, Aaron Walker, Mandy Nagy And Others To Discuss Protection Of The Free Press

By Tabitha Hale

Tuesday, June 26th, 2012



Like {21

June 26, 2012

For Immediate Release

Franklin Center Joins Lee Stranahan, Popehat, Aaron Walker, Mandy Nagy And Others To Discuss Protection Of The Free Press

Tonight at 9:30pm EDT, The Franklin Center joins Lee Stranahan, Mandy Nagy, and last night's SWATting victim Aaron Walker on a webinar to discuss recent attacks on bloggers and the suppression of free speech.

Convicted domestic terrorist Brett Kimberlin and his associates have repeatedly terrorized bloggers and others who highlight his story with over 100 frivolous lawsuits and 4 SWATting attacks. SWATting is a dangerous tactic that involves calling a police department to report a false crime to get a SWAT team dispatched to the victim's house. The attacks have included bloggers Patterico, Erick Erickson, and as recently as last night, Aaron Walker.

Yesterday, Rep. Sandy Adams of Florida and 87 cosigners sent another letter to AG Eric Holder urging investigation of costly SWATting tactics. In her statement, Adams said "SWAT-ting is quickly becoming a scare tactic used against political bloggers in an effort to stifle their First Amendment rights."

Tabitha Hale, New Media Director at the Franklin Center for Government and Public Intergrity, says "These tactics are just appalling. A free press is essential to a free society, and attempts to silence those who are telling the truth are entirely unacceptable. We are glad to have a small part in the fight to protect the First Amendment by supporting victims of these attacks. We will always err on the side of free speech."

Information on tonight's webinar is below. Learn what is at stake and learn how to protect yourself and your act of journalism.

Title: Fighting for a Free Press

Date: Tuesday, June 26, 2012

Time: 9:30pm to 10:30pm EDT

Reserve your space at the following link: https://www2.gotomeeting.com/register/630051426

After registering you will receive a confirmation email containing information about joining the Webinar.

Franklin Center Joins Lee Stranahan, Popehat, Aaron Walker, Mand... http://franklincenterhq.org/5833/franklin-center-joins-lee-stranahan-... Case 8:13-cv-03059-PWG Document 16-2 Filed 12/18/13 Page 3 of 4

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This entry was posted on Tuesday, June 26th, 2012 at 1:18 pm and is filed under Blog. Press Releases.

2 Responses to "Franklin Center Joins Lee Stranahan, Popehat, Aaron Walker, Mandy Nagy And Others To Discuss Protection Of The Free Press"



What a joke this is! Lee Stranahan has been doing nothing but going around blogging against conservatives and his sidekick Mandy Nagy endorses everything he has to say by promoting the garbage. You should see what they've said and done to a decorated conservative Marine on Twitter! It's convinced many these two are in it to destroy. Ms. Nagy is the ringleader of it all.

The both of these people should be exposed for the malcontent libs that they really are!

I'm disgusted with this type of propaganda! Feed it to someone else after you've vetted this garbage you expect the rest of us to swallow!

2. Janderson says: August 21, 2012 at 3:27 pm

After years of being in the stock market I have finally concluded the game is rigged! From blatant outright thievary which takes place on a daily basis to what goes on behind the scenes, I am absolutely disgusted with the current state of our financial system. Anyone have any thoughts? Is it Rigged or have a few bad seeds hurt the industry's reputation?

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