IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JOHN PAUL MAC ISAAC, Plaintiff, v. CABLE NEWS NETWORK, INC., ADAM BENNETT SCHIFF, POLITICO LLC, ROBERT HUNTER BIDEN, AND BFPCC, INC., Defendants.	)	Case No. _____

NOTICE OF REMOVAL

The United States, by and through its undersigned attorneys, hereby removes the above-captioned action to the United States District Court for the District of Delaware pursuant to 28 U.S.C. § 2679(d)(2), and respectfully gives notice as follows:

1. Representative Adam Schiff is a named defendant in an action filed in the Superior Court of the State of Delaware, County of Sussex, Miscellaneous Civil Action No. S22C-10-012-RHR. A copy of the amended complaint in that action is attached hereto as Exhibit A.

2. This Notice of Removal is supported by 28 U.S.C. § 2679(d)(2).

3. The Federal Tort Claims Act ("FTCA"), as amended by the Federal Employees Liability Reform and Tort Compensation Act of 1988 (the "Westfall Act"), codified in relevant part at 28 U.S.C. § 2679, provides that suit against the United States shall be the exclusive remedy for claims for damages for the negligent or wrongful act or omission of an employee of the government occurring within the scope of their office or employment. 28 U.S.C. § 2679(b)(1).

4. Section 2679(d)(2) states that "[u]pon certification by the Attorney General that the defendant employee was acting within the scope of his office or employment at the time of the incident out of which the claim arose, any civil action or proceeding commenced upon such claim in a State court shall be removed without bond at any time before trial by the Attorney General to the district court of the United States for the district and division embracing the place in which the action or proceeding is pending."

5. The Attorney General delegated his authority to issue such a certification to the Director of the Torts Branch. 28 C.F.R. § 15.4.

6. James G. Touhey, Jr., the Director of the Torts Branch within the Civil Division of the Department of Justice, certified that the defendant employee, Representative Schiff, was acting within the scope of his office or employment at the time of the incident out of which the claim arose. This certification covers the plaintiff's claims except to the extent those claims may fall within 28 U.S.C. § 2679(b)(2). A copy of this certification is attached as Exhibit B.

7. Because Representative Schiff was acting within the scope of his office or employment at the time of the incident out of which the plaintiff's claims arose, the United States intends to file a motion to substitute itself for Representative Schiff in this action for all claims for which the FTCA provides the exclusive remedy, 28 U.S.C. §§ 2679(b)(1), (d)(2), and to dismiss for lack of subject-matter jurisdiction.

8. Pursuant to 28 U.S.C. § 1446, written notice of this Notice of Removal is being provided to plaintiff, co-defendants, and a copy is being filed with the Superior Court of the State of Delaware.

9. In accordance with 28 U.S.C. § 1446(a) a copy of all process, pleadings, and

orders served on Representative Schiff are attached hereto as Exhibit C.[1]

10. All affirmative defenses are reserved until such time as a responsive pleading is due from the United States in this action.

WHEREFORE, pursuant to 28 U.S.C. § 2679(d)(2), the aforesaid action is removed from the Superior Court of the State of Delaware, County of Sussex, to the United States District Court for the District of Delaware.

Respectfully submitted,

BRIAN BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

JAMES G. TOUHEY, JR.
Director, Torts Branch

/s/ Stephen R. Terrell
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Dated: March 7, 2023

[1] The United States will separately lodge the available state court docket entries.

EFiled: Jan 20 2023 03:50PM EST
Transaction ID 68947480
Case No. S22C-10-012 RHR

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

JOHN PAUL MAC ISAAC Plaintiff, v. CABLE NEWS NETWORK, INC., ADAM BENNETT SCHIFF, POLITICO LLC., ROBERT HUNTER BIDEN AND BFPCC, INC. Defendants.	)	Case No.: S22C-10-012 RHR

FIRST AMENDED COMPLAINT

COMES NOW, PLAINTIFF John Paul Mac Isaac (hereinafter, "Plaintiff"), by and through undersigned counsel hereby sues Defendants and alleges as follows:

A. PARTIES, JURISDICTION & VENUE

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

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

3. Defendant Cable News Network, Inc. ("CNN") is a Delaware corporation that provides televised and internet-based news and commentary to

cable television subscribers and the general public. Its registered agent is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801

4. Defendant Adam Bennett Schiff ("SCHIFF"), being sued in his individual capacity, is an individual over the age of 18 who is *sui juris* and resides California and Maryland. SCHIFF is the United States Representative for the 28th District of California and was, at the time of the actions giving rise to this Complaint, the Chairman of the House of Representatives Permanent Select Committee on Intelligence. Schiff can be served at [redacted]

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

6. Defendant BFPCC, Inc. ("BFPCC") is a Delaware corporation that was used for the 2020 Presidential campaign of President Joseph R. Biden.

7. Defendant Robert Hunter Biden ("HUNTER") is currently a California resident who transacts significant business in State of Delaware and has significant ties to the State of Delaware.

8. Personal jurisdiction over Defendants is proper pursuant Del. Const. Art. IV, § 7.

9. Specific personal jurisdiction over SCHIFF is proper pursuant to 10 Del. C. §3104(c)(3).

10. Venue is appropriate in this Court as Plaintiff resides in New Castle County.

B. FACTS APPLICABLE TO ALL COUNTS

11. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 11.

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

13. Plaintiff owned a small business named The Mac Shop, Inc. (the "Mac Shop") which was a Delaware corporation.

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

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

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

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

18. On or about April 12, 2019, HUNTER was referred to Plaintiff's shop to fix some damaged Macs.

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

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

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

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

Date	Customer	ID	Title	Status	Amount
04/17/20...	Hunter Biden	6077 Not viewed	The Mac Shop Inv...	Overdue By 582...	$85.00 •••

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

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

25. Pursuant to the terms of the Repair Authorization signed by HUNTER, "[e]quipment left with the Mac Shop after 90 days of notification of

completed service will be treated as abandoned and you agree to hold the Mac Shop harmless for any damage or loss of property."

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

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

28. In August 2020, Plaintiff connected with COSTELLO to whom he provided a copy of the recovered data and the Repair Authorization.

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

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

31. On October 13, 2020, Plaintiff received a call from Mr. George Mesires,[1] identifying himself as HUNTER's attorney, asking if Plaintiff still had possession of his client's laptop and following up thereafter with an email to the Plaintiff. Copy of email attached as **EXHIBIT C**.

32. On October 14, 2020, at approximately 5:00 AM, the NY POST published an exposé about the contents of HUNTER's recovered data.

33. Shortly thereafter, the NY POST "updated" the online version of the exposé.

34. As a direct result of the NY POST exposé, public emotions were heightened and many in the general public, the media, and the government began to either defend or attempt to refute the exposé. The NY POST exposé fueled a rise in anger and hatred between the different political movements.

35. As a result of the publication of the exposé, the Plaintiff quickly became the target of accusations by those who sought to cast doubt on the information contained in the laptop and the laptop itself.

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

[1] George Mesires is a partner in the Chicago office of Faegre Drinker Biddle & Reath LLP.

37. While Plaintiff verified how he came into possession of the recovered data to the NY POST, Plaintiff was unaware of the details of the NY POST exposé, when the NY POST exposé was going to be published, and Plaintiff explicitly told the NY POST that he did not want to be identified.

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

39. Plaintiff was not explicitly identified in the NY POST exposé but was, instead, referred to as the Delaware computer repair shop "store's owner."

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

41. Also on October 14, 2020, *subsequent* to the NY POST's disclosure of the Plaintiff's identity, other media outlets, including writers from the Daily Beast purportedly investigating the NY POST exposé, interviewed and wrote an article about the Plaintiff portraying him as bizarre

(https://www.thedailybeast.com/man-who-reportedly-gave-hunters-laptop-to-rudy-speaks-out-in-bizarre-interview).[2]

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

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

44. Upon information and belief, the Public Statement was issued to influence American voters to vote for then-candidate, now President, Joseph R.

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

Biden and offered no actual evidence of the claims that Russia was involved in the release of the information from Hunter Biden's laptop.

45. On October 19, 2020, Director of National Intelligence Ratcliffe, stated:

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

46. In a letter dated, October 20, 2020, Ms. Jill C. Tyson, Assistant Director of the FBI's Office of Congressional Affairs reported to Congress that the FBI has, "nothing to add at this time to the October 19th public statement by the Director of National Intelligence about the available actionable intelligence." Copy of letter attached as **EXHIBIT G**.

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

48. On or about October 30, 2020, Plaintiff's clarifying statement was published by justthenews.com for all to read.[3]

49. On October 21, 2021, POLITICO published a story confirming the validity of the NY POST exposé. *See*

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

https://www.politico.com/news/magazine/2021/10/12/hunter-biden-corruption-515583.

50. On March 16, 2022, the NY Times published an article further verifying the validity of the NY POST exposé stating:

> People familiar with the investigation said prosecutors had examined emails between Mr. Biden, Mr. Archer and others about Burisma and other foreign business activity. Those emails were obtained by The New York Times from a cache of files that appears to have come from a laptop abandoned by Mr. Biden in a Delaware repair shop. The email and others in the cache were authenticated by people familiar with them and with the investigation.

See https://www.nytimes.com/2022/03/16/us/politics/hunter-biden-tax-bill-investigation.html.

51. On March 30, 2022, the Washington Post confirmed the validity of the NY POST exposé. *See* https://www.washingtonpost.com/technology/2022/03/30/hunter-biden-laptop-data-examined/.

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

52. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

53. SCHIFF, individually, was actively involved in fundraising for the 2020 Presidential campaign of Joseph R. Biden, Jr. Articles outlining Defendant's fundraising efforts attached as **EXHIBIT H**.

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

55. According to a poll conducted by the Media Research Center, nearly 9.4% of Biden voters would not have voted for him had they known about the full extent of the scandal.[4]

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

56. Upon information and belief, SCHIFF knowingly fomented further anger and hatred against the Plaintiff and others in his defense of Presidential-candidate, Joseph R. Biden, Jr., and his attempt to "kill" the story.

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

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

58. The Interview was conducted live "via Cisco Webex" with BLITZER in New York and SCHIFF at home.

59. BLITZER's first question to SCHIFF was:

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

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

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

61. SCHIFF continued with:

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

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

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

63. SCHIFF responded as follows:

> "Well, I was in the Intelligence Committee today to see what the latest was, and frankly, ***we haven't gotten much from the intelligence community very recently***, which concerns me. They have at times, some of the leadership, like Director [of National Intelligence] Ratcliffe, not been very forthcoming in terms of the intelligence on the Russian threat and been promoting this false equivalence with other countries.
>
> So, you know, I wish I could tell you more, Wolf. I wish the intelligence community was able to tell the public more.
>
> ***But we do know this: the Russians are once again actively involved in trying to denigrate the Vice President***…" ***Emphasis*** added.

64. Director of National Intelligence Ratcliffe's repudiation of that claim on October 19, 2020 was during an interview on *Fox News Mornings with Maria*.

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

66. SCHIFF confirmed this in his interview with BLITZER.

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

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

69. SCHIFF had not received reports that the Hunter Biden laptop information was part of a Russian disinformation campaign, therefore, SCHIFF knowingly and intentionally made the false statements that the information contained in the NY POST exposé, originally obtained from the Plaintiff, was part of a Russian plot to influence the U.S. Presidential election.

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

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

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

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

74. Upon information and belief, SCHIFF's false statements were made from his home *after* normal working hours.

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

76. SCHIFF's false statements were, in fact, campaign speech and not speech associated with his Congressional duties which, of course, do not include lying to the American public about the Plaintiff.

77. Plaintiff, a target of SCHIFF's defamatory campaign speech, was not a participant in any political campaign.

78. SCHIFF knowingly conveyed false information with the intent to harm the reputation of Plaintiff.

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

80. Upon information and belief, SCHIFF knowingly conveyed false information to the public with the intent to manipulate the public in the United States to elect Joseph R. Biden, Jr. as the next President.

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

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

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

84. The tortious injury to Plaintiff in Delaware by SCHIFF's false and defamatory statements could reasonably have been foreseen.

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

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

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

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

89. SCHIFF's false and defamatory campaign statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a Russian attempt to undermine American democracy and the 2020 Presidential election.

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

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

92. SCHIFF acted with actual malice toward the Plaintiff in that he acted with knowledge that his statements were false.

93. Alternatively, SCHIFF acted with actual malice toward the Plaintiff in that he acted with reckless disregard to the harm his knowingly defamatory false campaign statements would have on the Plaintiff, both personally and as a small business owner.

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

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

96. SCHIFF knew or should have known that his false and defamatory statements would be broadcast to an audience in Delaware.

97. SCHIFF knew or should have known that his false and defamatory statements would be viewed via the Internet by Delaware residents.

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income resulting from SCHIFF's false and defamatory statements;

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

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

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

(e) Requiring SCHIFF to make a public apology to Plaintiff; and

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

D.COUNT 2: DEFAMATION AND DEFAMATION PER SE CNN

99. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 99.

100. Upon information and belief, CNN supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections or, alternatively, opposed the candidacy of Donald J. Trump.

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

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

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

104. CNN knew Plaintiff was the source of the information as it had published an article referencing an interview with Plaintiff on October 14, 2020.[5] In that article, it said:

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

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

106. CNN also falsely reported that, based on the October 20, 2020 letter to Congress from Ms. Jill C. Tyson, there was a "suggestion" that the review was continuing.[6]

107. There was no such suggestion in the letter to Congress.

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[5] https://lite.cnn.com/en/article/h_7e5fcdffc7051ba1d73b135ee16f5b3b

[6] https://www.cnn.com/2020/10/21/politics/fbi-russia-disinformation/index.html

108. CNN's false report that the letter from Ms. Jill C. Tyson suggested that the review was continuing created a strong implication that U.S. intelligence officials actually believed Russia was involved in the release of information from Hunter Biden's laptop.

109. CNN boasts a viewership of over 700,000 viewers each week.[7]

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

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

110. CNN broadcast and published its statements that the Hunter Biden laptop is part of a Russian disinformation scheme and that the U.S. intelligence agencies are continuing to investigate Russia's participation without privilege to do so to its over 700,000 viewers.

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

112. At the time CNN broadcast the defamatory false statements, CNN knew the backstory of the Hunter Biden laptop, having spoken with Plaintiff and written about the Plaintiff on October 14, 2020.

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[7] https://www.adweek.com/tvnewser/week-of-march-28-basic-cable-ranker-fox-news-improves-to-no-1-in-total-primetime-viewers/504622/

113. CNN acted with actual malice toward the Plaintiff by knowingly and intentionally broadcasting and publishing false and defamatory statements about the Hunter Biden laptop being tied to a Russian disinformation campaign in an attempt to harm Plaintiff's reputation.

114. Alternatively, CNN acted with actual malice toward the Plaintiff by knowingly broadcasting and publishing the false and defamatory statements about Plaintiff with reckless disregard for the harm the false statements would cause to the Plaintiff.

115. CNN knowingly broadcast and published the falsehoods to third parties – its over 700,000 viewers and its readership.

116. CNN knew or should have known such false and defamatory statements would likely result in material and substantial injury to Plaintiff, as the statements accused the Plaintiff of knowingly participating in a Russian scheme to disrupt the 2020 presidential elections in the United States of America.

117. CNN's broadcast and publication of the false and defamatory statements have subjected and continue to subject the Plaintiff to distrust, scorn, ridicule, hatred, and contempt.

118. CNN's broadcast and publication of the false and defamatory statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a

Russian attempt to undermine American democracy and the 2020 Presidential election.

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

120. Upon information and belief, CNN executives specifically told its journalists and television personalities to refer to the NY POST expose as having been resolved in the previously reported impeachment of President Donald Trump.[8]

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

122. It is clear by its broadcasts and publications, CNN intended to harm the Plaintiff and any other party associated with the release of information from the laptop by broadcasting and publishing the false and defamatory statements about the Plaintiff.

123. CNN acted with actual malice toward the Plaintiff in that it acted with knowledge that the statements were false or, at the very least, acted with reckless

[8] https://nypost.com/2020/12/02/cnn-caught-burying-the-posts-hunter-biden-expose-devine/

disregard to the harm the knowingly defamatory false statements would have on the Plaintiff, both personally and as a small business owner.

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income resulting from CNN's false and defamatory broadcast and publication;

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

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

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

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

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

E. COUNT 4: DEFAMATION AND DEFAMATION PER SE POLITICO

126. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

127. Upon information and belief, POLITICO supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections or, alternatively, opposed the candidacy of Donald J. Trump.

128. On October 19, 2020, POLITICO published an article entitled:[9]

NATIONAL SECURITY

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

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

129. The October 19, 2020 article relied on the "Public Statement on the Hunter Biden Emails," signed by more than 50 former intelligence officials (**EXHIBIT F**) for its reporting.

130. The headline to the October 19, 2020 article says that the Hunter Biden story ***IS*** Russian disinformation, according to dozens of former intel officials.

[9] https://www.politico.com/news/2020/10/19/hunter-biden-story-russian-disinfo-430276

131. POLITICO specifically referenced Plaintiff in its article:

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

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

133. POLITICO knowingly falsely stated as fact in the title of its article that the Hunter Biden story ***IS*** Russian disinformation.

134. The article was written by journalist Natasha Bertrand, who seemingly has a history of transforming speculation into fact in the stories upon which she reports.[10]

135. POLITICO knowingly published the article with a false headline stated as fact about Plaintiff and others involved in releasing the information about the laptop.

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

137. The false and defamatory publication about the Plaintiff by POLITICO include, but are not limited to, allegations that the information

[10] https://www.washingtonpost.com/opinions/2020/02/28/how-politicos-natasha-bertrand-bootstrapped-dossier-credulity-into-tv-gig/

published by the NY POST, which POLITICO clearly identifies the information as coming from Plaintiff, was part of a Russian disinformation campaign, thereby directly implying that the Plaintiff part of a Russian disinformation campaign and/or, more specifically, a Russian agent.

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

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

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

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

142. POLITICO knowingly published the falsehoods as facts to third parties – its readers.

143. POLITICO knew or should have known such false statements in the publication would likely result in material and substantial injury to Plaintiff, as the statements call into question Plaintiff's loyalty to the United States.

144. POLITICO knew or should have known such false statements in the publication would likely result in subjecting Plaintiff to distrust, scorn, ridicule, hatred, and contempt, which continues to this day.

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

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

147. Upon information and belief, and based on the prejudicial October 19th article, POLITICO intended to harm the Plaintiff (among others) through the publication of the false statements.

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of POLITICO's wrongdoing;

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

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

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

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

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

F. COUNT 5: DEFAMATION AND DEFAMATION PER SE BFPCC, INC.

150. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

151. BFPCC, which is an acronym for "Biden for President Campaign Committee," is a Delaware corporation formed to operate as the Presidential campaign for President Joseph R. Biden, Jr.

152. As such, BFPCC supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections.

153. On or about October 14, 2020, as quoted in a POLITICO article, Biden campaign officials stated that the NY POST exposé "is a Russian disinformation operation." *See* https://www.politico.com/news/2020/10/14/biden-campaign-lashes-out-new-york-post-429486.

154. Senior Biden Campaign Advisor, Symone D. Sanders, on behalf of BFPCC, stated in an interview on MSNBC that, "[i]f the president [Trump] decides to amplify these latest smears against the vice president and his only living son, that is Russian disinformation." *See* https://greenwald.substack.com/p/biden-the-media-and-cia-labeled-the.

155. Biden Deputy Campaign Manager Kate Bedingfield, on behalf of BFPCC, said of the information from the laptop, "I think we need to be very, very clear that what [Trump is] doing here is amplifying Russian misinformation." *See* Id.

156. The Candidate himself, Joseph R. Biden, Jr., representing the views of BFPCC, said, "[t]here are 50 former national intelligence folks who said that what

he's accusing me of is a Russian plant. Five former heads of the CIA, both parties, say what he's saying is a bunch of garbage. Nobody believes it except his good friend Rudy Giuliani." *See* https://www.nationalreview.com/corner/sure-seems-joe-biden-knowingly-lied-about-the-hunter-biden-laptop-story/.

157. Joseph R. Biden, Jr. also said, "[t]he intelligence community warned the president that Giuliani was being fed disinformation from the Russians. We also know Putin is trying to spread disinformation about Joe Biden. When you put the combination of Russia, Giuliani, and the president together ... it is what it is. A smear campaign." *See* https://krcrtv.com/joe-biden-calls-hunter-email-story-a-smear-stays-quiet-about-2017-business-meeting.

158. The members/employees of BFPCC knew or should have known that the claims that the Hunter Biden Laptop story is Russian disinformation were false.

159. Despite such knowledge, BFPCC knowingly published and broadcast the falsehoods as facts to third parties – the supporters of candidate Joseph R. Biden, Jr.

160. BFPCC knew or should have known such false statements would likely result in material and substantial injury to Plaintiff, as the statements call into question Plaintiff's loyalty to the United States.

161. BFPCC knew or should have known such false statements would likely result in subjecting Plaintiff to distrust, scorn, ridicule, hatred, and contempt, which continues to this day.

162. BFPCC's false statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a Russian attempt to undermine American democracy and the 2020 Presidential election.

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

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of BFPCC's wrongdoing;

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

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

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

(e) Requiring BFPCC issue a public apology to Plaintiff; and

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

G. COUNT 5: DEFAMATION AND DEFAMATION PER SE ROBERT HUNTER BIDEN

166. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

167. HUNTER is the son of President Joseph R. Biden, Jr.

168. HUNTER supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections.

169. HUNTER knowingly left his laptop with Plaintiff on April 12, 2019.

170. Soon thereafter HUNTER returned to Plaintiff's shop to leave an external hard drive to which Plaintiff could transfer the data from HUNTER's laptop.

171. HUNTER never returned to Plaintiff's shop pick up his laptop.

172. When asked about the laptop in a television interview broadcast around the world, HUNTER stated, "There could be a laptop out there that was stolen from me. It could be that I was hacked. It could be that it was the – that it was Russian intelligence. It could be that it was stolen from me. Or that there was a laptop stolen from me." *See* https://edition.cnn.com/2021/04/02/politics/hunter-biden-laptop/index.html.

173. HUNTER knew it was his laptop.

174. HUNTER's attorney, George Mesires contacted Plaintiff on October 13, 2020 about the laptop.

From: "Mesires, George R." [redacted]
Date: October 13, 2020 at 6:58:59 PM EDT
To: "macisaac@demacshop.com" [redacted]
Subject: George Mesires contact information

John Paul:

Thank you for speaking with me tonight. As I indicated, I am a lawyer for Hunter Biden and I appreciate you reviewing your records on this matter. Thank you.

George

George R. Mesires
Partner
[redacted]
Connect: vCard

[redacted] direct

Faegre Drinker Biddle & Reath LLP
311 S. Wacker Drive, Suite 4300
Chicago, Illinois 60606, USA

175. HUNTER knowingly broadcast the false and defamatory information about his laptop to third parties – viewers of the interview.

176. HUNTER's knowing broadcast of the false and defamatory information about his laptop imputed that Plaintiff was involved in one or more crimes including, theft of his laptop, hacking of his laptop, or being part of a plot by Russian intelligence.

177. HUNTER knew or should have known such false statements would likely result in material and substantial injury to Plaintiff, as the statements impute that Plaintiff has committed one or more crimes.

178. HUNTER knew or should have known such false statements in the publication would likely result in subjecting Plaintiff to distrust, scorn, ridicule, hatred, and contempt, which continues to this day.

179. HUNTER's false statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a Russian attempt to undermine American democracy and the 2020 Presidential election.

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

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of HUNTER's wrongdoing;

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

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

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

(e) Requiring HUNTER issue a public apology to Plaintiff; and

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

H. COUNT 6: CIVIL CONSPIRACY TO COMMIT DEFAMATION ALL DEFENDANTS

183. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 183.

184. All Defendants expressed support for then-Presidential candidate, Joseph R. Biden, in the 2020 U.S. Presidential election and/or opposed incumbent candidate, Donald J. Trump.

185. The information contained in the NY POST exposé hurt the candidacy of Joseph R. Biden, Jr. and polls show that it could have resulted in the loss of the presidential election.

186. All Defendants knew that the information contained in the NY POST exposé would hurt the candidacy of Joseph R. Biden and, potentially, prevent his election.

187. Voters who voted for Joseph R. Biden have indicated that, if they had known more about the Hunter Biden laptop, they likely would not have voted for Joseph R. Biden.

188. All Defendants acted in concert to prevent the re-election of President Donald J. Trump, which included defaming the Plaintiff.

189. All Defendants openly participated in the efforts to "kill" the Hunter Biden laptop story by making accusations that Plaintiff was a willing participant in a Russian plot to spread disinformation to impact the U.S. presidential election.

190. All Defendants openly participated in the efforts to falsely communicate to the general public that the Hunter Biden laptop story ***is*** Russian disinformation and that Plaintiff is working with the Russians to influence the U.S. Presidential elections.

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

192. Each Defendant provided substantial assistance to the other Defendants by repeating the defamatory statements to bolster the false claims.

193. Each Defendant assisted the other Defendants to accomplish a lawful purpose (the election of Joseph R. Biden, Jr.) through unlawful means (defamation).

194. The defamatory statements made about the Plaintiff by the Defendants in furtherance of a conspiracy to cast doubt on the validity of the information contained on the Hunter Biden Laptop resulted in significant damage to the Plaintiff's reputation and his business which closed soon after the defamatory statements were broadcast and published.

195. As a result a result of the reputational damage to Plaintiff and the closing of his business, Plaintiff has suffered loss of his business and income.

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of Defendants' wrongdoing;

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

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

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

(e) Requiring all Defendants to issue public apologies to Plaintiff; and

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

I. COUNT 8: AIDING AND ABETTING ALL DEFENDANTS

196. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 183.

197. All Defendants expressed support for then-Presidential candidate, Joseph R. Biden, in the 2020 U.S. Presidential election and/or opposed incumbent candidate, Donald J. Trump.

198. The information contained in the NY POST exposé hurt the candidacy of Joseph R. Biden, Jr. and polls show that it could have resulted in the loss of the presidential election.

199. All Defendants knew that the information contained in the NY POST exposé would hurt the candidacy of Joseph R. Biden and, potentially, prevent his election.

200. Voters who voted for Joseph R. Biden have indicated that, if they had known more about the Hunter Biden laptop, they likely would not have voted for Joseph R. Biden.

201. Each Defendant knowingly provided assistance to the other Defendants by falsely spreading the defamatory information to prevent the re-election of President Donald J. Trump.

202. All Defendants knowingly participated in the efforts to "kill" the Hunter Biden laptop story by making accusations that Plaintiff was a willing participant in a Russian plot to spread disinformation to impact the U.S. presidential election.

203. All Defendants knowingly participated in the efforts to falsely communicate to the general public that the Hunter Biden laptop story ***is*** Russian disinformation and that Plaintiff is working with the Russians to influence the U.S. Presidential elections.

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

205. Each Defendant provided substantial assistance to the other Defendants by repeating the defamatory statements to bolster the false and defamatory claims.

206. Each Defendant assisted the other Defendants to accomplish a lawful purpose (the election of Joseph R. Biden, Jr.) through unlawful means (defamation).

207. The defamatory statements made about the Plaintiff by the Defendants in furtherance of a conspiracy to cast doubt on the validity of the information contained on the Hunter Biden Laptop resulted in significant damage to the Plaintiff's reputation and his business which closed soon after the defamatory statements were broadcast and published.

208. As a result a result of the reputational damage to Plaintiff and the closing of his business, Plaintiff has suffered loss of his business and income.

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of Defendants' wrongdoing;

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

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

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

(e) Requiring all Defendants to issue public apologies to Plaintiff; and

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

DEMAND FOR JURY TRIAL

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

Date: January 20, 2023

Respectfully submitted,

THE POLIQUIN FIRM LLC

/s/ Ronald G. Poliquin
RONALD G. POLIQUIN, ESQUIRE
Delaware Bar ID No. 4447
1475 S. Governors Ave.
Dover, DE 19904
(302) 702-5501
ron@poliquinfirm.com

/s/ Brian R. Della Rocca, Esquire
Brian R. Della Rocca, Esquire
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Rockville, Maryland 20850
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Fax: (301) 740-2297

bdellarocca@compass-law.com

Attorneys for Plaintiff

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT A

THE Mac SHOP "We Fix Macs"

Quote #7469

21a Trolley Square
Wilmington DE 19806
1-888-947-MACS (Phone)
support@demacshop.com

Bill To:
Hunter Biden
202-552-9396
rhbdc@icloud.com

Data recovery for MacBook Pros: Attempt data recovery from 3 macbook pros. Recover data to store server and contact customer when complete.

Date: 4/12/19

Qty	Item No.	Description	Unit Price	Extension	Total
1.00	Labor	Hardware Level 1	$85.00	$85.00	$85.00
			Total	$85.00	$85.00
				Grand Total	**$85.00**

Signature: _____

The Mac Shop Inc. has quoted _____ business days for the completion of this repair. During this time unforeseen complications with parts and shipping can affect the time required to complete the repair. If a situation should arise that prevents the repair from being completed in the quoted time, The Mac Shop will provide an updated estimated time for completion. The Mac Shop Inc. is not liable for repairs completed outside of the quote and an exact completion date cannot be guaranteed.

Liability for damage to your computer is limited to any damage determined to be caused by the repair shopís negligent acts or omissions. This liability is limited to the total price of the repairs. Some upgrades and repairs will require updates to your system, The Mac Shop will assist in any applicable updates but it is the responsibility of the user to assure applications and software are current. The Mac Shop Understands that the most important component of your computer is your data and we will make every effort to back up and secure your data, however no data can be guaranteed.

Equipment left with the Mac Shop after 90 days of notification of completed service will be treated as abandoned and you agree to hold the Mac Shop harmless for any damage or loss of property. In the event of nonpayment, The Mac Shop reserves the right to remove any equipment or parts installed. A 60 day warranty is provided for all service and repair provided by The Mac Shop. We will happily demonstrate that the repair/upgrade is complete upon pickup of the upgrade or repair. This warranty excludes software, accidental damage, or any part not exchanged in the repair.

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT B

AO 110 (Rev. 06/09) Subpoena to Testify Before a Grand Jury

UNITED STATES DISTRICT COURT

for the

District of Delaware

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

Grand Jury Subpoena Number
19-3-LFWS-V-136

To: The Mac Shop Inc.
c/o John Paul Mac Isaac
21 Trolley Square
Wilmington, DE 19806

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
J. Caleb Boggs Federal Building Room 3001, 844 King Street Wilmington, DE 19801	Response Due By: Tuesday, December 17, 2019

You must also bring with you the following documents, electronically stored information, or objects *(blank if not applicable)*:

In lieu of personal appearance, please see ATTACHMENT A

Date: December 9, 2019

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

Lesley F. Wolf
Assistant United States Attorney
United States Attorney's Office
1313 North Market Street, Suite 400
Wilmington, DE 19899-2046
Phone:(302) 573-6277

19-3-LFWS-V-136

PROOF OF SERVICE

This subpoena for *(name of individual or organization)* The MAC Shop
was received by me on *(date)* 12/9/2019 .

☒ I served the subpoena by delivering a copy to the named person as follows:
John Paul Mac Isaac
on *(date)* 12/9/19 ; or

☐ I returned the subpoena unexecuted because:

.

I declare under penalty of perjury that this information is true.

Date: 12/9/2019

Server's signature

Joshua Wilson, Special Agent, FBI
Printed name and title

FBI - Wilmington RA, 500 Delaware Ave Suite 300 Wilmington, DE
Server's address

Additional information regarding attempted service, etc:

19-3-LFWS-V-136

ATTACHMENT A

1. Apple MacBook Pro Laptop Computer; Serial Number FVFXC2MMHV29

2. Western Digital (external hard drive); Serial Number: WX21A19ATFF3

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT C

From: "Mesires, George R." [redacted]@faegredrinker.com>
Date: October 13, 2020 at 6:58:59 PM EDT
To: [redacted]
Subject: George Mesires contact information

John Paul:

Thank you for speaking with me tonight. As I indicated, I am a lawyer for Hunter Biden and I appreciate you reviewing your records on this matter. Thank you.

George

George R. Mesires
Partner
[redacted]@faegredrinker.com
Connect: vCard

+1 312 356 5101 direct

Faegre Drinker Biddle & Reath LLP
311 S. Wacker Drive, Suite 4300
Chicago, Illinois 60606, USA

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT D

Op-Ed – JP Mac Isaac

I represent John Paul Mac Isaac, the Mac repair shop owner in Wilmington, Delaware who unwittingly became the target of a smear campaign by doing what he thought was right. John Paul is not a right-wing fanatic nor is he a Russian hacker.

By way of background, John Paul has owned his shop for over ten years now. Prior to that, John Paul was the "Lead Genius" at the Apple Store in Littleton, Colorado and New Castle, Delaware. Once, while employed by Apple, he found himself in a situation where, while fixing a customer's iMac, he came across seemingly illegal material. He followed protocol and contacted the authorities. No one questioned John Paul's ethics then.

Fast-forward to April 12, 2019 when a man claiming to be Hunter Biden walked into his shop. While John Paul was pleased that someone of Hunter Biden's notoriety was in his shop, he did not question why Hunter Biden was there. In fact, Hunter Biden had been referred to John Paul's shop. John Paul is well respected in the community and it would not have been uncommon for his patrons to refer others to his shop. John Paul provided a solution for one of Hunter Biden's three laptops on the spot. Another laptop was a complete write-off but the third laptop required more significant intervention. That laptop remained in the shop with John Paul. Hunter Biden returned two days later with an external hard drive to which John Paul would transfer the information.

According to John Paul, recovering the data was difficult because of the significant liquid damage to the drive. He would boot the computer and transfer as much as he could before the computer shut down. Then, he would boot up the computer again, verify what was copied, and then transfer more data until the computer shut down again. This process repeated several times. During this process, John Paul saw certain pieces of information but, at the time, he did not think anything of it. Instead, John Paul completed the work and contacted Hunter Biden to let him know. Hunter Biden never responded. As requested by Hunter Biden, a secure payment request was sent in an email but was never paid. John Paul contacted him at least one more time but Hunter Biden never responded. The policy of the shop is that items not picked up within 90 days of the completion of the services will be treated as abandoned property.

Around mid-July of 2019, news of Hunter Biden's business dealings with the Ukraine were coming more into focus and John Paul started to get uncomfortable with the information he had seen. He was unsure if the hard drive contained information pertinent to the legal investigation. At that point, he reached out to his father, a retired Colonel in the U.S. Air Force, for advice about what he should do. They both decided that going to the FBI and handing over the Mac and the drive was their best course of action. Soon thereafter, John Paul's father took a copy of the hard drive to an FBI field office in Albuquerque, New Mexico. The FBI turned John Paul's father away.

Then, in mid-October of 2019, an FBI Agent reached out to Colonel Mac Isaac and wanted to discuss the Mac and drive. At that point, Colonel Mac Isaac passed along John Paul's contact information. The FBI then reached out to John Paul and met him at his house to discuss John Paul's concerns. On December 9, 2019, the FBI served a Subpoena on John Paul for the

computer, the hard drive, and all related paperwork. He willingly gave it to the FBI and was happy to see it go.

Out of an abundance of caution, John Paul made a copy of the drive in case he was ever thrown under the bus as a result of what he knew. As John Paul watched the impeachment trial, he wondered why there was no reference to the information he had provided to the FBI. As a result, starting in February of 2020 and until July of 2020, John Paul reached out to several members of Congress to notify them of what he had in his possession. His requests fell on deaf ears.

Out of frustration, in the beginning of September, John Paul reached out to someone he thought would be able to provide the information directly to the President. That person was Rudy Giuliani. A day after John Paul reached out to Giuliani's office, Robert Costello, Rudy Giuliani's lawyer, contacted John Paul to discuss the information and John Paul's concerns.

On September 24, 2020, John Paul then submitted information about the drive to Senator Ron Johnson through the whistleblower link on Senator Johnson's website. After that submission and while Giuliani's office was still trying to verify the information, Senator Johnson released the senate report on the Biden business dealings. As we all know, prior to the New York Post's exposé, rumors began to circulate about the existence of Hunter Biden's laptop. Those rumors did not start with John Paul. We believe, due to the timing of the rumors, that the information may have been leaked by Senator Johnson's office. Then, when Rudy Giuliani released the information to the New York Post, that is when John Paul's life as a respected part of the Wilmington, Delaware community changed.

Now that the timeline has been established, what do we know?

1) We know it is Hunter Biden's laptop because we have his signature on the Repair Authorization and Hunter Biden's attorney has reached out to John Paul about the computer.
2) Hunter Biden never returned to retrieve the information rendering it abandoned property or, in other words, junk. We know that once you throw something into the trash, you relinquish your privacy rights to it, which is why so many investigations include a search of a person's trash.
3) The FBI confiscated the computer and the external hard drive and left John Paul with a receipt.
4) The information on the drive was leaked by someone prior to the New York Post exposé. John Paul has not released any information as he is cooperating with law enforcement and to do so could hurt the investigation.

What do we not know?

1) We do not know if all emails released by the New York Post were actually on the hard drive.
2) We do not know if the initial leak was from Senator Johnson's office, from Rudy Giuliani himself, or from somewhere else.

On October 26, 2020, in an opinion piece on CNN, Senator Chris Murphy discussed what he described as the "facts" that Americans need to know about Russia's interference in the U.S. election. In the piece, Senator Murphy outlines how, as part of the Senate Foreign Relations Committee, he is intimately aware of the interference methods being used by Russia. One of those methods includes "hiring unknowing Americans" to do Russia's bidding. He concludes his piece by surmising that the "strange tale of a purported Biden family laptop's data ending up in the hands of Rudy Giuliani is a likely sign that Russia's campaign to plant fictional, anti-Biden propaganda into the US political debate may just be ramping up." Then, in an effort to support his assumption, he cites a recent letter from fifty (50) former intelligence officials who argued that the laptop story had "all the hallmarks of a Russian operation."

Senator Murphy failed to share facts with the American public. First, the letter from the former intelligence officials is their opinion based on their experience. They do not have access to the information to be able to know, for a fact, that the information is not part of a Russian operation. Senator Murphy, on the other hand, works with Senator Johnson on the Foreign Relations Committee and has the ability to obtain the information in question. Perhaps he should have done so before writing an opinion piece and labeling it as "fact."

Congressman Adam Schiff, the Chairman of the House Intelligence Committee, also publicly insinuated that the laptop story is related to an alleged smear campaign against Vice President Biden that originated as part of a Russian disinformation plot. Specifically, Congressman Schiff told CNN's Wolf Blitzer that, "clearly the origins of this whole smear are from the Kremlin," and "this particular smear, though, has also been acknowledged to come from the Kremlin."

Congressman, let's be very clear, the laptop exists and it contains materials relating to Hunter Biden and Burisma. I cannot confirm that the full extent of what was released by Rudy Giuliani is, in fact, on the laptop but you, as the Chairman of the House Intelligence Committee, have the authority to find that out. As a reminder, the laptop is with the FBI.

On the other side of the aisle, Senator Johnson, Rudy Giuliani, and countless other Republicans have used the laptop provided to them as part of a political campaign. That was not John Paul's intent. He was trying to get the information to law enforcement and, in doing so, became a victim of politics. Although he is receiving support from many Americans, he is also the subject of death threats and will likely be out of business as a result of this whole affair. This take no prisoners approach to politics is where the problem lies – on both sides of the political aisle. The rest of us can easily get caught up in the information being presented as if it is fact when, in reality, much of what we hear or read is not.

The news media is not much better. Instead of reporting on the matter, news outlets are making the decision themselves as to the veracity of the claims about Hunter Biden's laptop. If you are an avid follower of CNN or Politico, you have already been led to believe that John Paul is a part of an overall Russian disinformation campaign.

Twitter and Facebook have taken it upon themselves to relegate this story to a level equal to that of conspiracy theories. The actions by these social media platforms further hurt John Paul's reputation by advancing the notion that he is a part of a Russian disinformation campaign.

The problem is not that John Paul turned over the information to those he believed he could trust, it is that politics today seems to revel in sensation and ignores the collateral damage left in its wake. Not only are our elected officials seemingly happy to obfuscate the facts in order to attack their opponents, they are also perfectly willing to throw everyday Americans under the bus for their own political gain.

I, myself, am purposely not affiliated with any political party. I do not know what John Paul's party affiliation is nor does it matter to me. John Paul is an American, like the rest of us. I honestly do not know what I would have done in a similar situation. I do know that John Paul did what he believed was right. He has not profited in any way off this situation. The reality is quite the opposite. John Paul will likely have to start a new career at the age of 44.

John Paul is not the problem, politics, biased reporting, and social media are.

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT E

From: Hiatt, Fred
To: Brian Della Rocca; Marcus, Ruth
Cc: NEWS - Oped Editors
Subject: RE: John Paul Mac Isaac
Date: Wednesday, October 28, 2020 3:22:39 PM
Attachments: image001.png

Brian,
I don't think this will be a good fit for us. Thanks for the look.
Fred

From: Brian Della Rocca <bdellarocca@compass-law.com>
Sent: Wednesday, October 28, 2020 11:51 AM
To: Marcus, Ruth <Ruth.Marcus@washpost.com>; Hiatt, Fred <fred.hiatt@washpost.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: RE: John Paul Mac Isaac

Thank you, Ruth.

Please find a Word version attached.

Brian

Brian R. Della Rocca, Esquire
Partner - Compass Law Partners

Phone 240-454-1013
Fax 301-740-2297
Web www.Compass-Law.com [compass-law.com] **Email**
BDellaRocca@Compass-Law.com
48 Maryland Ave. Suite 400, Annapolis, MD 21401
51 Monroe St., Suite 408, Rockville, MD 20850

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From: Marcus, Ruth <Ruth.Marcus@washpost.com>
Sent: Wednesday, October 28, 2020 11:49 AM
To: Brian Della Rocca <bdellarocca@compass-law.com>; Hiatt, Fred <fred.hiatt@washpost.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: Re: John Paul Mac Isaac

Fred's out of pocket but I can provide that assurance.

Ruth Marcus
Washington Post deputy editorial page editor/columnist

From: Brian Della Rocca <bdellarocca@compass-law.com>
Sent: Wednesday, October 28, 2020 11:39 AM
To: Hiatt, Fred <fred.hiatt@washpost.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: RE: John Paul Mac Isaac

I just need assurance that, if you were to turn it down, it will not be shared with anyone else inside or outside of the Washington Post.

Brian R. Della Rocca, Esquire
Partner - Compass Law Partners

Phone 240-454-1013
Fax 301-740-2297
Web www.Compass-Law.com [compass-law.com] **Email** BDellaRocca@Compass-Law.com
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From: Hiatt, Fred <fred.hiatt@washpost.com>
Sent: Wednesday, October 28, 2020 11:00 AM
To: Brian Della Rocca <bdellarocca@compass-law.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: RE: John Paul Mac Isaac

Brian,
You can share the piece with us, and if it seems like something we might publish, we can discuss length in the next stage.
Fred

From: Brian Della Rocca <bdellarocca@compass-law.com>
Sent: Wednesday, October 28, 2020 10:33 AM

To: Hiatt, Fred <fred.hiatt@washpost.com>
Subject: John Paul Mac Isaac

CAUTION: EXTERNAL SENDER

Mr. Hiatt,

I represent John Paul Mac Isaac, the owner of the Mac repair shop in Wilmington, DE. In an attempt to clear things up with the American public, I would like to submit an op-ed on his behalf. However, the op-ed I prepared exceeds the word-count limitations.

I have chosen the Washington Post to publish the op-ed because I respect the newspaper's reporting.

Please let me know the best way to proceed.

Thank you.
Brian

Brian R. Della Rocca, Esquire
Partner - Compass Law Partners

Phone 240-454-1013
Fax 301-740-2297
Web www.Compass-Law.com [compass-law.com] **Email** BDellaRocca@Compass-Law.com
48 Maryland Ave. Suite 400, Annapolis, MD 21401
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EXHIBIT F

Public Statement on the Hunter Biden Emails

October 19, 2020

We are all individuals who devoted significant portions of our lives to national security. Some of us served in senior positions in policy departments and agencies, and some of us served in senior positions in the Intelligence Community. Some of us were political appointees, and some were career officials. Many of us worked for presidents of both political parties.

We are all also individuals who see Russia as one of our nation's primary adversaries. All of us have an understanding of the wide range of Russian overt and covert activities that undermine US national security, with some of us knowing Russian behavior intimately, as we worked to defend our nation against it for a career. A few of us worked against Russian information operations in the United States in the last several years.

Perhaps most important, each of us believes deeply that American citizens should determine the outcome of elections, not foreign governments. All of us agree with the founding fathers' concern about the damage that foreign interference in our politics can do to our democracy.

It is for all these reasons that we write to say that the arrival on the US political scene of emails purportedly belonging to Vice President Biden's son Hunter, much of it related to his time serving on the Board of the Ukrainian gas company Burisma, has all the classic earmarks of a Russian information operation.

We want to emphasize that we do not know if the emails, provided to the New York Post by President Trump's personal attorney Rudy Giuliani, are genuine or not and that we do not have evidence of Russian involvement -- just that our experience makes us deeply suspicious that the Russian government played a significant role in this case.

If we are right, this is Russia trying to influence how Americans vote in this election, and we believe strongly that Americans need to be aware of this.

There are a number of factors that make us suspicious of Russian involvement.

Such an operation would be consistent with Russian objectives, as outlined publicly and recently by the Intelligence Community, to create political chaos in the United States and to deepen political divisions here but also to undermine the candidacy of former Vice President Biden and thereby help the candidacy of President Trump. For the Russians at this point, with Trump down in the polls, there is incentive for Moscow to pull out the stops to do anything possible to help Trump win and/or to weaken Biden should he win. A "laptop op" fits the bill, as the publication of the emails are clearly designed to discredit Biden.

Such an operation would be consistent with some of the key methods Russia has used in its now multi-year operation to interfere in our democracy – the hacking (via cyber operations) and the dumping of accurate information or the distribution of inaccurate or misinformation. Russia did both of these during the 2016 presidential election – judgments shared by the US Intelligence Community, the investigation into Russian activities by Special Counsel Robert Mueller, and the entirety (all Republicans and Democrats) on the current Senate Intelligence Committee.

Such an operation is also consistent with several data points. The Russians, according to media reports and cybersecurity experts, targeted Burisma late last year for cyber collection and gained access to its emails. And Ukrainian politician and businessman Adriy Derkach, identified and sanctioned by the US Treasury Department for being a 10-year Russian agent interfering in the 2020 election, passed purported materials on Burisma and Hunter Biden to Giuliani.

Our view that the Russians are involved in the Hunter Biden email issue is consistent with two other significant data points as well. According to the Washington Post, citing four sources, "U.S. intelligence agencies warned the White House last year that Giuliani was the target of an influence operation by Russian intelligence."

In addition, media reports say that the FBI has now opened an investigation into Russian involvement in this case. According to USA Today, "…federal authorities are investigating whether the material supplied to the New York Post by Rudy Giuliani…is part of a smoke bomb of disinformation pushed by Russia."

We do not know whether these press reports are accurate, but they do suggest concern within Executive Branch departments and agencies that mirrors ours. It is high time that Russia stops interfering in our democracy.

Signed by,

Jim Clapper
Former Director of National Intelligence
Former Under Secretary of Defense for Intelligence
Former Director of the National Geospatial Intelligence Agency
Former Director of the Defense Intelligence Agency

Mike Hayden
Former Director, Central Intelligence Agency
Former Director, National Security Agency
Former Principal Deputy Director of National Intelligence

Leon Panetta

Former Director, Central Intelligence Agency
Former Secretary of Defense

John Brennan
Former Director, Central Intelligence Agency
Former White House Homeland Security and Counterterrorism Advisor
Former Director, Terrorism Threat Integration Center
Former Analyst and Operations Officer, Central Intelligence Agency

Thomas Finger
Former Deputy Director of National Intelligence for Analysis
Former Assistant Secretary for Intelligence and Research, Department of State
Former Chair, National Intelligence Council

Rick Ledgett
Former Deputy Director, National Security Agency

John McLaughlin
Former Acting Director, Central Intelligence Agency
Former Deputy Director, Central Intelligence Agency
Former Director of Analysis, Central Intelligence Agency
Former Director, Slavic and Eurasian Analysis, Central Intelligence Agency

Michael Morell
Former Acting Director, Central Intelligence Agency
Former Deputy Director, Central Intelligence Agency
Former Director of Analysis, Central Intelligence Agency

Mike Vickers
Former Under Secretary of Defense for Intelligence
Former Operations Officer, Central Intelligence Agency

Doug Wise
Former Deputy Director, Defense Intelligence Agency
Former Senior CIA Operations Officer

Nick Rasmussen
Former Director, National Counterterrorism Center

Russ Travers
Former Acting Director, National Counterterrorism Center
Former Deputy Director, National Counterterrorism Center
Former Analyst of the Soviet Union and Russia, Defense Intelligence Agency

Andy Liepman
Former Deputy Director, National Counterterrorism Center
Former Senior Intelligence Officer, Central Intelligence Agency

John Moseman
Former Chief of Staff, Central Intelligence Agency
Former Director of Congressional Affairs, Central Intelligence Agency
Former Minority Staff Director, Senate Select Committee on Intelligence

Larry Pfeiffer
Former Chief of Staff, Central Intelligence Agency
Former Director, White House Situation Room

Jeremy Bash
Former Chief of Staff, Central Intelligence Agency
Former Chief of Staff, Department of Defense
Former Chief Counsel, House Permanent Select Committee on Intelligence

Rodney Snyder
Former Chief of Staff, Central Intelligence Agency
Former Director of Intelligence Programs, National Security Council
Chief of Station, Central Intelligence Agency

Glenn Gerstell
Former General Counsel, National Security Agency

David B. Buckley
Former Inspector General, Central Intelligence Agency
Former Democratic Staff Director, House Permanent Select Committee on Intelligence
Former Counterespionage Case Officer, United States Air Force

Nada Bakos
Former Analyst and Targeting Officer, Central Intelligence Agency

Patty Brandmaier
Former Senior Intelligence Officer, Central Intelligence Agency
Former Deputy Associate Director for Military Affairs, Central Intelligence Agency
Former Deputy Director of Congressional Affairs, Central Intelligence Agency

James B. Bruce
Former Senior Intelligence Officer, Central Intelligence Agency
Former Senior Intelligence Officer, National Intelligence Council

Considerable work related to Russia

David Cariens
Former Intelligence Analyst, Central Intelligence Agency
50+ Years Working in the Intelligence Community

Janice Cariens
Former Operational Support Officer, Central Intelligence Agency

Paul Kolbe
Former Senior Operations Officer, Central Intelligence Agency
Former Chief, Central Eurasia Division, Central Intelligence Agency

Peter Corsell
Former Analyst, Central Intelligence Agency

Brett Davis
Former Senior Intelligence Officer, Central Intelligence Agency
Former Deputy Director of the Special Activities Center for Expeditionary Operations, CIA

Roger Zane George
Former National Intelligence Officer

Steven L. Hall
Former Senior Intelligence Officer, Central Intelligence Agency
Former Chief of Russian Operations, Central Intelligence Agency

Kent Harrington
Former National Intelligence Officer for East Asia, Central Intelligence Agency
Former Director of Public Affairs, Central Intelligence Agency
Former Chief of Station, Central Intelligence Agency
Former Analyst, Central Intelligence Agency

Don Hepburn
Former Senior National Security Executive

Timothy D. Kilbourn
Former Dean, Sherman Kent School of Intelligence Analysis, Central Intelligence Agency
Former PDB Briefer to President George W. Bush, Central Intelligence Agency

Ron Marks
Former Officer, Central Intelligence Agency
Twice former staff of the Republican Majority Leader

Jonna Hiestand Mendez
Technical Operations Officer, Central Intelligence Agency

Emile Nakhleh
Former Director of the Political Islam Strategic Analysis Program, Central Intelligence Agency
Former Senior Intelligence Analyst, Central Intelligence Agency

Gerald A. O'Shea
Senior Operations Officer, Central Intelligence Agency
Served four tours as Chief of Station, Central Intelligence Agency

David Priess
Former Analyst and Manager, Central Intelligence Agency
Former PDB Briefer, Central Intelligence Agency

Pam Purcilly
Former Deputy Director of Analysis, Central Intelligence Agency
Former Director of the Office of Russian and European Analysis, Central Intelligence Agency
Former PDB Briefer to President George W. Bush, Central Intelligence Agency

Marc Polymeropoulos
Former Senior Operations Officer, Central Intelligence Agency
Former Acting Chief of Operations for Europe and Eurasia, Central Intelligence Agency

Chris Savos
Former Senior Intelligence Officer, Central Intelligence Officer

Nick Shapiro
Former Deputy Chief of Staff and Senior Advisor to the Director, Central Intelligence Agency

John Sipher
Former Senior Operations Officer, Central Intelligence Agency
Former Deputy Chief of Russian Operations, Central Intelligence Agency

Stephen Slick
Former Senior Director for Intelligence Programs, National Security Council
Former Senior Operations Office, Central Intelligence Agency

Cynthia Strand
Former Deputy Assistant Director for Global Issues, Central Intelligence Agency

Greg Tarbell
Former Deputy Executive Director, Central Intelligence Agency
Former Analyst of the Soviet Union and Russia, Central Intelligence Agency

David Terry
Former Chairman of the National Intelligence Collection Board
Former Chief of the PDB, Central Intelligence Agency
Former PDB Briefer to Vice President Dick Cheney, Central Intelligence Agency

Greg Treverton
Former Chair, National Intelligence Council

John Tullius
Former Senior Intelligence Officer, Central Intelligence Agency

David A. Vanell
Former Senior Operations Officer, Central Intelligence Agency

Winston Wiley
Former Director of Analysis, Central Intelligence Agency
Former Chief, Counterterrorism Center, Central Intelligence Agency

Kristin Wood
Former Senior Intelligence Officer, Central Intelligence Agency
Former PDB Briefer, Central Intelligence Agency

In addition, nine additional former IC officers who cannot be named publicly also support the arguments in this letter.

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Case No. S22C-10-012 CAK

EXHIBIT G

U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20535-0001

October 20, 2020

The Honorable Ron Johnson
Chairman
Committee on Homeland Security and
Governmental Affairs
United States Senate
Washington, D.C. 20510

Dear Chairman Johnson:

This responds to your letter, dated October 17, 2020, to the Federal Bureau of Investigation (FBI) regarding the authenticity of certain information provided to your Committee, including whether such information is linked to a foreign adversary's influence operation or is otherwise fraudulent. You also ask several questions about a laptop computer reportedly produced pursuant to a grand jury subpoena.

As you may know, the Office of the Director of National Intelligence has advised the American public that, in advance of the 2020 election, a number of nation-states plan to use covert and overt influence measures in an attempt to sway voter preferences and perspectives, sow discord in the United States, and undermine the confidence of Americans in our democratic process. The FBI is the primary investigative agency responsible for the integrity and security of the 2020 election, and as such, we are focused on an array of threats, including the threat of malign foreign influence operations. Regarding the subject of your letter, we have nothing to add at this time to the October 19th public statement by the Director of National Intelligence about the available actionable intelligence. If actionable intelligence is developed, the FBI in consultation with the Intelligence Community will evaluate the need to provide defensive briefings to you and the Committee pursuant to the established notification framework.

Finally, as the FBI advised the Committee in its letter, dated October 5, 2020, consistent with longstanding Department of Justice (Department) policy and practice, the FBI can neither confirm nor deny the existence of any ongoing investigation or persons or entities under investigation, including to Members of Congress. As the Inspector General firmly reminded the Department and the FBI in recent years, this policy is designed to preserve the integrity of all Justice Department investigations and the Department's ability to effectively administer justice without political or other undue outside influences. Therefore, the FBI cannot provide any additional information in response to the enumerated questions in your letter.

Thank you for your support of the FBI, its mission, and its people.

Sincerely,

Jill C. Tyson
Assistant Director
Office of Congressional Affairs

cc: The Honorable Gary Peters, Ranking Member
Senate Committee on Homeland Security and Governmental Affairs

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EXHIBIT H

Case 1:23-cv-00247-MN Document 1-1 Filed 03/07/23 Page 73 of 185 PageID #: 76

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At Biden fundraiser, top Dems and Jason Alexander bash Trump, and get personal

Event, which nominee does not attend, billed as 'Virtual Conversation on Anti-Semitism,' focuses on president's role in rising hate

By **RON KAMPEAS**
5 August 2020, 5:28 am

From left: Sen. Jacky Rosen, "Seinfeld" star Jason Alexander and Rep. Adam Schiff. (Getty Images via JTA)

WASHINGTON (JTA) — A fundraiser for Joe Biden on Monday night was billed as a "Virtual Conversation on Anti-Semitism" with three marquee speakers: Rep. Adam Schiff, the California Democrat who chairs the US House of Representatives Intelligence Committee; Nevada freshman Sen. Jacky Rosen; and Jason Alexander — yes, that Jason Alexander, the one famed for his portrayal of George Costanza on "Seinfeld."

The conversation, co-organized by the Biden campaign and the Democratic National Committee, included plenty of critique aimed at US President Donald Trump, whom liberal Jews accuse of stoking anti-Semitism in the US — but it also veered into poignant territory at times, offering a rare window into the politicians' personal Jewish identities. Biden did not attend.

Alexander, who moderated the talk, invited Rosen (who last year co-founded the Senate Bipartisan Task Force for Combating Anti-Semitism) and Schiff (who spearheaded Trump's impeachment proceedings last year) to draw a direct line between Trump's rhetoric and the rise in anti-Semitism during his term, evidenced in attacks such as the Pittsburgh Tree of Life and Poway synagogue shootings. Trump's defenders counter that by saying the president forcefully and unequivocally condemned anti-Semitism after the Tree of Life attack.

"We have to assume that our president has exacerbated the problem. Adam, he typically refers to you as 'Shifty Schiff,' so he obviously plays into anti-Semitic tropes and stereotypes," Alexander said. "How much do you hold him, and frankly the Republicans that echo and abet him, responsible for these increases in the amount of hate activity that we're seeing?"

Rep. Adam Schiff, D-Calif., Chairman of the House Intelligence Committee, speaks during a news conference on Capitol Hill, after a meeting at the White House, June 30, 2020 in Washington. (AP Photo/Alex Brandon)

Rosen obliged. "So many people are enabling the president," she said. "The rise of anti-Semitism just manifesting itself in different ways, whether it's the left the right, the center, we have to call it out — but regardless of that, everything starts at the top."

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Schiff also said Trump was ultimately responsible for a rise in bigotry, noting his recent appeal to "suburban housewives" that he would protect their neighborhoods from interlopers.

"The president has a unique capability to set the tone, nationally, and he has set the most ugly, bitter, divisive and sometimes racist tone of any president, certainly in my lifetime," Schiff said. "And, you know, people follow that."

Rosen said education was critical to countering anti-Semitism and referred to the Never Again Act, which funds Holocaust education, and which she helped pass this year. Holocaust survivors were dying off, she said.

Case 1:23-cv-00247-MN Document 1-1 Filed 03/07/23 Page 75 of 185 PageID #: 78

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"It's important that we tell those stories, because if we don't learn from them, if we don't shine a light to educate, then we're lost," Rosen said.

Sen. Jacky Rosen, D-Nev., speaks during a Senate Homeland Security and Governmental Affairs Committee hearing titled 'CBP Oversight: Examining the Evolving Challenges Facing the Agency,' June 25, 2020, on Capitol Hill in Washington. (Tom Williams/Pool via AP)

Alexander asked Schiff to comment on the false claim proliferating on the far right that he is in cahoots with the liberal Jewish billionaire, George Soros.

"The main one that's been circulated is that George Soros and I are related because my sister is married to his son," he said. "When that first caught on like wildfire, I called my brother and I said 'Dan I've got some good news and some bad news. The good news is we have a sister. Why didn't Mom tell us? And the even better news is, she married really well.'"

Jewish critics of Trump point to several examples that they say proves he either has a blind spot on anti-Semitism or actively engenders it. Trump has told Jewish donors that he "doesn't want your money," has said Jews who vote for Democrats are disloyal to other Jews and posted an ad during the 2016 campaign superimposing Hillary Clinton's face on a pile of money and a six-pointed star. His first statement on the Holocaust as president omitted any mention of Jews.

Biden rolled out his campaign in April 2019 with a video in which he said he was spurred to run after Trump equivocated in condemning the deadly neo-Nazi violence at a 2017 March in Charlottesville, Virginia. The assumed Democratic presidential nominee has said dozens of times that his campaign is a "battle for the soul of this nation," and often cites the rise of anti-Semitism.

A member of the audience listens as Democratic presidential candidate former Vice President Joe Biden speaks at a campaign event at the William 'Hicks' Anderson Community Center in Wilmington, Delaware, July 28, 2020. (AP Photo/Andrew Harnik)

Alexander asked Schiff and Rosen what he should tell politically conservative Jewish friends who say Trump has been good for Israel. Republicans "paint any criticism of Israel as anti-Semitic," Rosen said. "We can criticize our own government, we can criticize our spouse or family or kids, it doesn't mean you don't love them. It doesn't mean you shouldn't have a robust conversation."

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Tickets to the event, made public on Monday by Jewish Insider, were at a minimum $250, although donors could check amounts up to $50,000. About 400 people called in, raising $200,000. (The Jewish Telegraphic Agency obtained a phone call-in number, so a reporter was able to hear, if not see the proceedings.)

Alexander also asked Schiff and Rosen to personalize their Jewish experience, and that's when the conversation took a turn.

"Do you know how much your bar or bat mitzvah actually cost, within five thousand dollars?" Alexander asked at one point.

Rosen, a former synagogue president who was bat mitzvahed as an adult, knew but would not tell. Schiff said he did not know, except for the fact that his cost less than his older brother's did.

Did they remember "even one line" of their haftarah? (No.) "I remember having my voice crack," Schiff said. Had they ever not fasted on Yom Kippur? (Yes.) Had they ever built a sukkah? "Yes!" said Rosen, sounding surprised she was able to answer in the affirmative. (Schiff was a "no.")

What was their favorite Hanukkah present? "I remember my favorite present when I was a kid," Schiff said. "It was this self-winding car, you pull back a little lever and it would scoot across the floor."

"We had the piano bench," Rosen said. "That's what that's where all the Hanukkah presents were, so I just remember always going under… opening presents under the piano."

After recalling how he set a favorite Gumby doll's head alight with a menorah flame, Alexander then asked how their Jewishness led them into public service. Neither answer had anything to do with Israel or with religious learning.

Rosen recalled her grandmother discussing the "old country" and the sense of want she attached to it, and how her "bubbe" inculcated in her the idea that she should always reserve something for those less fortunate. For Schiff, it was education.

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"My father, who is 92 and is watching us this evening, telling me how, the one thing they can't take away from you is your education," he said.

Alexander also asked them to describe personal experiences of anti-Semitism. Both their answers typified the experience of their generation — Rosen is 63 and Schiff is 60.

In this July 25, 2017 file photo, actor Jason Alexander participates in the 'Hit the Road' panel during the Audience Network Television Critics Association Summer Press Tour at the Beverly Hilton on in Beverly Hills, California. (Chris Pizzello/Invision/AP, File)

"I don't have an actual memory of it but a memory of a story," Rosen said.

Her parents "took me to Florida I think must have been about 1960 or so, and we were swimming in a pool, and somebody came up to my mom and said she had to take her daughter out of the pool," Rosen said. "'She's a dirty Jew, you have to get out of the pool'."

Schiff described the experience of a pastor's candid anti-Semitism, expressed because the pastor did not realize Schiff was Jewish. "Look at the Jews, they don't have their spiritual house in order, and they say 'never again' but if they don't get their spiritual house in order, it will happen again," Schiff quoted the pastor as saying.

"It gave me a window into how much anti-Semitism there is," he said, adding that he informed the pastor he was speaking to a Jew.

DEADLINE

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Haim Saban's Fundraiser For Joe Biden Raises $4.5 Million

By Ted Johnson

Ted Johnson
Political Editor
@tedstew

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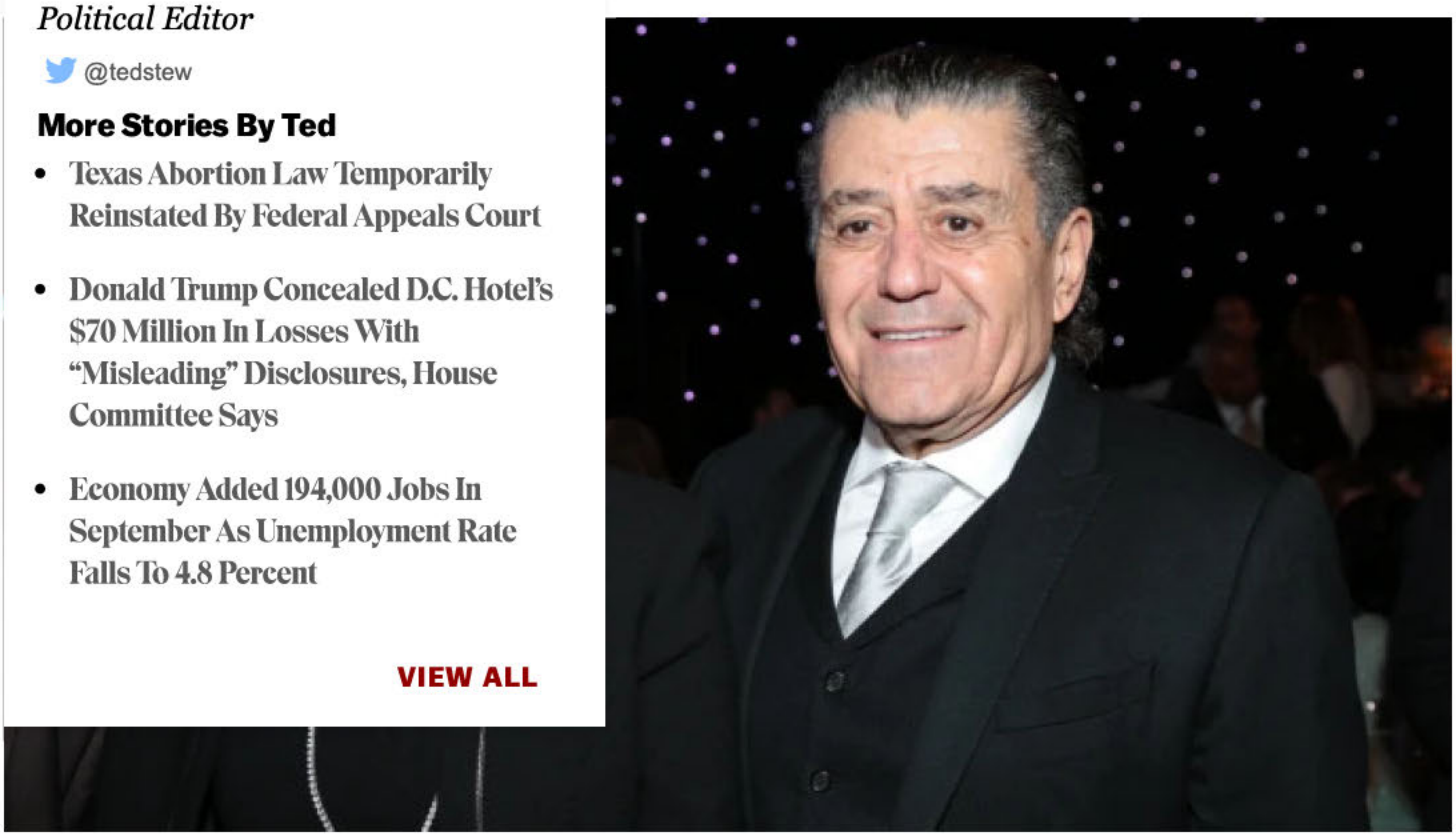

Cheryl Saban and Haim Saban in 2017.
Alex J. Berliner/ABImages via AP Images

A fundraiser for Joe Biden organized by Haim Saban raised $4.5 million on Monday, marking the media mogul's first event for the 2020 presidential race.

Saban and Rep. Adam Schiff (D-CA) cohosted the event, with 22 people in the crowd, according to a pool report. Tickets were priced at $500,000 per person (meaning not

everyone was a donor), and the other guests included Cheryl Saban, Tim Disney, Frank Gehry and Susan Disney Lord.

Saban, a longtime donor and bundler for Democrats, did not endorse during the primary, unlike 2016, when he was an early backer of Hillary Clinton.

He introduced Biden for the virtual event, and after a bit of a glitch in which Biden could not be heard ("You're on mute Mr. Vice President," Saban warned), the former vice president echoed comments he made earlier in the day about California's devastating wildfires and the connection to climate change.

"This crisis demands action, not denial," Biden said. "But as Donald Trump visits California today, we know he's not going to step up. He already said he wants to withhold aid and punish the state for not voting for him. The West is literally on fire, and it's still all about him. He likes to tweet about protecting the suburbs. That's his dog whistle on race. But wildfires and the hurricanes are literally tearing the suburbs apart."

Biden predicted that Democrats would win back the Senate. Saban has contributed almost $250,000 to the Democratic Senatorial Campaign Committee and more than $1.5 million to the Senate Majority Fund, a political action committee to win back the Senate for the Democrats.

"I hope all of you, because you've been so generous to me — I'm being greedy here — I hope you're being generous to some of the Senate candidates around the country," Biden said. "Because I think we'll win back the United States Senate this time."

This article was printed from https://deadline.com/2020/09/haim-saban-joe-biden-fundraiser-adam-schiff-1234576682/

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Rep. Adam Schiff flexes party muscle with strong fundraising for Biden, Democrats

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House Intelligence Committee Chairman Adam B. Schiff (D-Burbank) talks about the transcript of the call between President Trump and Ukrainian President Volodymyr Zelensky. (Kirk McKoy / Los Angeles Times)

By JENNIFER HABERKORN | STAFF WRITER

AUG. 17, 2020 4 PM PT

WASHINGTON — Rep. Adam B. Schiff is dramatically increasing his political fundraising in the wake of his high-profile role in President Trump's impeachment trial and ahead of possible vacancies next year in the U.S. Senate and House Democratic leadership — two promotions that could interest the Burbank Democrat.

Schiff has raised more than $22 million since the beginning of 2019 for his campaign committee and other Democratic groups, including Joe Biden's presidential race

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It's a sharp rise in fundraising for Schiff, who became chairm Intelligence Committee in 2019 and gained national attention as the lead prosecutor in the Senate impeachment trial of Trump this year.

He's already doubled the $9.9-million fundraising haul for his campaign and other committees in the two-year cycle before the 2018 election. In the 2016 cycle, he raised only $1 million, according to the Open Secrets website. That did not include fundraising for the party committees, which was minimal, according to his campaign.

Compared with other House Democrats, Schiff now ranks third in fundraising behind Speaker Nancy Pelosi (D-San Francisco) and Rep. Cheri Bustos (D-Ill.), who leads the committee to elect House Democrats, according to a fundraising document viewed by The Times.

Schiff's fundraising surge comes as two potential political promotions come within view.

If Biden is elected in November, Gov. Gavin Newsom would have the power to appoint a replacement for Sen. Kamala Harris, the presumptive Democratic vice presidential candidate. While Newsom is viewed as likely to choose a woman or person of color for the seat, Schiff's fundraising efforts could be seen as boosting his chances.

Schiff has eyed the Senate before. When Sen. Dianne Feinstein was deciding whether to run for a fifth term or retire in 2018, he considered running if she stepped down.

There's also a possible House leadership race if Pelosi retires. In late 2018, she agreed to step down as leader of the House Democrats by 2022 and could leave office earlier. There is no clear successor in place, and Schiff would probably be a contender for a job

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"Schiff has always felt that if you keep your head down and focus on doing the work, the rest will take care of itself. And that philosophy has put him at the center of House Democrats' effort to hold the president accountable and defend our democracy," said the aide, who asked to not be identified in discussing the issue.

Besides the impeachment trial, Schiff gained an increasingly prominent party role in 2019 when he was placed in charge of fundraising for the House Democrats who face the toughest reelection fights, called "front-line members."

These Democrats typically represent historically Republican districts and oftentimes are freshman members. While Democrats are expected to retain control of the House in the 2020 election, the most vulnerable Democrats often require the most fundraising to fend off challengers.

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The $22 million Schiff has raised since the beginning of last year includes $12.4 million for his reelection campaign, $7.3 million for the Democratic Congressional Campaign Committee and for House Democrats in tough races, more than $2.4 million for Biden and $635,000 for Democratic Senate candidates, according to figures provided by his

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California has often been called the Democratic Party's ATM[illegible]hine that Schiff has been able to successfully use to help Democrats. Half of the money raised in his reelection committee came from California donors, according to the campaign. Because Schiff's seat is considered safe, he is able to spread that money to other Democrats.

Schiff's Republican challenger, Eric Early, has raised $1.4 million as of June, according to Federal Election Commission documents. In almost any other district, Early's fundraising would be enough to provide a substantial challenge, but Democratic voters dramatically outnumber Republicans in the district.

Like the Biden fundraiser Monday, Schiff has focused on virtual events since the COVID-19 pandemic shut down in-person gatherings. Earlier this month, he held a fundraiser with actor Jason Alexander and Sen. Jacky Rosen (D-Nev.) in support of Democrats. By election day, he's expected to have done 50 events for House and Senate candidates.

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Jennifer Haberkorn covers Congress in Washington, D.C., for the Los Angeles Times. She has reported from Washington since 2005, spending much of that time roaming the halls of the U.S. Capitol. Before arriving at The Times, Haberkorn spent eight years at Politico writing about the 2010 healthcare law, a story that took her to Congress, the states, healthcare clinics and courtrooms around the country. She also covered Congress and local business news for the Washington Times. Haberkorn is a native of the Chicago area and graduated from Marquette University in Milwaukee, Wis.

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EXHIBIT I

THE SITUATION ROOM

Joe Biden Campaigns in Michigan; COVID-19 Second Wave?; Trump Refuses to Condemn QAnon Conspiracy Group Labeled a Domestic Terror Threat by FBI; U.S. Investigating if Recently Published Emails are Tied to Russian Disinformation Effort Targeting Biden; Rep. Adam Schiff (D-CA) is Interviewed About Trump Warned Last Year That Giuliani Was Being Used to Feed Him Russian Misinformation. Aired 6-7p ET

Aired October 16, 2020 - 18:00 ET

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[18:00:21]

ANNOUNCER: This is CNN breaking news.

WOLF BLITZER, CNN HOST: We want to welcome our viewers here in the United States and around the world. I'm Wolf Blitzer in THE SITUATION ROOM.

We're following breaking news.

Tonight, there are new and very ominous indicators that the United States is now plunging into the second wave of the coronavirus pandemic. In addition to the rising death toll and case count, most states are now reporting alarming spikes in infections, 21 of them seeing all-time highs, as hospitalizations around the country are soaring.

23,000 Americans may die by the end of election week.

The president watching all of this unfold right now.

Let's go to the White House first. We're watching this very closely over there.

CNN's Kaitlan Collins is joining us right now with the very latest.

What are you learning, Kaitlan?

KAITLAN COLLINS, CNN WHITE HOUSE CORRESPONDENT: Well, Wolf, you're seeing the president wrap up his rally there in Florida.

He's headed to Georgia next. And he's bringing with him this message that he's been pushing for several weeks now, but is now doubling down on it, insisting that we are rounding the corner when it comes to the coronavirus pandemic, even though, as you noted, we're seeing cases surge to record highs in some states here in the United States. And we're also learning something that the White House has been

telling us for the last several months, that the president is tested every single day, is not true.

(BEGIN VIDEOTAPE)

COLLINS (voice-over): President Trump and Joe Biden battling in battleground states today one night after going head to head, but not face to face, in town halls.

DONALD TRUMP, PRESIDENT OF THE UNITED STATES: I didn't watch sleepy Joe last night. I just wanted t see what he looked like.

COLLINS: In Florida, Trump making his pitch to seniors as polls show Biden is leading nationwide with voters 6: and older.

TRUMP: Seniors will be the first in line for the vaccine. We are rounding the turn. I say that all the time. Some of the media doesn't like hearing it. But I say it all the time. We're rounding that turn.

wearing during last night's town hall in Miami.

TRUMP: Hey, Dr. Fauci said don't wear a mask. Right?

SAVANNAH GUTHRIE, NBC NEWS HOST: At first, but then everybody agreed.

TRUMP: Oh, I don't know. Then he changed his mind. But then you have a report coming out two days ago that 85 percent of the people wearing masks catch it.

COLLINS: The CDC report Trump is referring to did not find that 85 percent of people who wore a mask got coronavirus. It wasn't even about masks and instead found that people who got COVID-19 were twice as likely to have reported eating at a restaurant than those who did not.

The president is sowing doubt about wearing a mask, even as former New Jersey Governor Chris Christie, who was recently released from intensive care after his coronavirus diagnosis, admitted he was wrong not to wear a mask at the White House.

CHRIS CHRISTIE (R), FORMER GOVERNOR OF NEW JERSEY: It was a mistake. I was led to believe that all the people that I was interacting with at the White House had been tested. And it gave you a false sense of security

COLLINS: Trump told NBC News he's not tested on a daily basis, like staff claimed, and that he can't remember i he was tested before his debate with Joe Biden.

TRUMP: I don't know. I don't even remember. I test all the time. Again, the doctors do it. I don't ask them. I test al the time.

COLLINS: Last night, Trump quickly denounced white supremacy, but stepped on his own message when he danced around condemning the conspiracy group QAnon.

TRUMP: I know nothing about it. I do know they are very much against pedophilia. They fight it very hard, but I know nothing about it.

If you'd like me to...

TRUMP: ... study the subject.

COLLINS: Trump was also pressed on why he retweeted an absurd conspiracy that Osama bin Laden's death was a hoax and President Obama and Joe Biden had SEAL Team Six killed, a baseless theory debunked by a Navy SEAL, who was there.

TRUMP: That was a retweet. That was an opinion of somebody...

GUTHRIE: But...

TRUMP: And that was a retweet. I will put it out there. People can decide for themselves. I don't take a position.

GUTHRIE: I don't get that, you're the president. You're not like, someone's crazy uncle who can just...

TRUMP: No, no. No, no.

GUTHRIE: ... retweet, whatever.

COLLINS: Joe Biden struck a more subdued tone during his own town hall, as he criticized the president and sidestepped questions about expanding the Supreme Court.

GEORGE STEPHANOPOULOS, ABC NEWS HOST: But don't voters have a right to know where you stand?

JOE BIDEN (D), PRESIDENTIAL NOMINEE: They do have a right to know where I stand. And they will have a right to know where I stand before they vote.

COLLINS: According to television ratings from the dueling town halls, more people watch to Biden than the ratings-obsessed president, who went after NBC's Savannah Guthrie for her tough questioning.

TRUMP: It's a nice pleasurable evening, as I have somebody going totally crazy last night.

(LAUGHTER)

(END VIDEOTAPE)

[18:05:03] COLLINS: And, Wolf, the president going after Savannah Guthrie there, as we are now learning something that his former chief of staff has said privately about him.

That's John kelly, of course, who was here before the president's last Chief of Staff, Mick Mulvaney. But now CNN is reporting that John Kelly has privately told friends this about the president.

And, obviously, it's not flattering: "The depths of his dishonesty is just astounding to me, the dishonesty, the transactional nature of every relationship, though it's more pathetic than anything else."

John Kelly went on to say: "He is the most flawed person I have ever met in my life."

That's what John Kelly, who worked for the president for a little under two years as his top aide, is apparently telling people about what he thinks about the president privately -- Wolf.

BLITZER: Yes, it's pretty amazing stuff, indeed.

All right, Kaitlan Collins at the White House for us, thank you very much.

Let's check in with CNN's Brian Todd. He's also working this story for us.

Brian, today, it was confirmed, more than eight million confirmed coronavirus cases here in the United States over these past several months. That's more than any other country in the world.

BRIAN TODD, CNN CORRESPONDENT: Right, Wolf.

It's really just not going well anywhere on the country right now. Just a short time ago also, the president's own surgeon general, Dr. Jerome Adams, warned about the outbreak in Wisconsin, saying that Wisconsin has positivity rates of over 10 percent and that the state is -- quote -- "going in the wrong direction."

And this comes just one day before President Trump plans to hold a large rally in Janesville, Wisconsin. This is

(BEGIN VIDEOTAPE)

TODD (voice-over): Hospital beds on the move in Albuquerque, New Mexico, with hospitals pushing capacity. Officials in New Mexico say many coronavirus patients there need to be transferred from one hospital to another throughout the state.

And, tonight, they're worried about having enough people to take care of them.

DR. DAVID SCRASE, NEW MEXICO HUMAN SERVICES SECRETARY: Our hospital leaders' greatest concern today is staffing up those beds. They point out that the health care work force that's been fighting

valiantly against COVID in New Mexico, they're getting tired. There's some people who've stepped back.

TODD: Cases have spiked to such an extent in New Mexico that the governor is telling people flat out don't leave your home if you don't have to. The virus, she says, is winning.

GOV. MICHELLE LUJAN GRISHAM (D-NM): This is the most serious emergency that New Mexico has ever faced.

TODD: Wisconsin is also seeing horrific spikes. And officials say many new cases are tied directly to virus spreads in prisons and veterans homes, like the King facility in Waupaca County.

DIANE LYNCH, WISCONSIN DEPARTMENT OF VETERANS AFFAIRS: There are 52 members currently in quarantine. And there are 25 staff members currently out of the work unit with positive COVID tests.

TODD: Wisconsin and New Mexico are two of 10 states that just reported their single highest day of new cases ever.

The numbers are daunting all the way around. The U.S. topped 60,000 new cases in a single day for the first time since August 14, 32 states today trending up in new cases. The U.S. just passed eight million total cases of this virus. And America's top experts are very worried about the months ahead.

DR. ANNE RIMOIN, UCLA EPIDEMIOLOGIST: As we move towards the winter, and the weather is getting

moment in history.

TODD: Experts say, this year, even with so many Americans desperate for some kind of celebration, holidays will have to be scaled back to combat the virus.

The CDC has just issued new guidelines for how Americans can stay safe at Thanksgiving, among them, assess th infection rates in your community, consider postponing or canceling activities. Think about having outdoor dinners, weather permitting, or hosting virtual dinners.

And limit the number of people at any gathering. Mask-wearing and distancing are more important than ever, America's leading voice on infectious disease says. And he's becoming impatient with people who aren't doing those things.

DR. ANTHONY FAUCI, DIRECTOR, NATIONAL INSTITUTE OF ALLERGY AND INFECTIOUS DISEASES: So, if you think that by getting infected and saying -- pooh-poohing the prevention modalities, that you're living in a vacuum and you're not -- no, you're becoming part of the problem.

(END VIDEOTAPE) TODD: But Dr. Fauci emphasized that it is still not too late to turn the tide for what will happen with the virus this fall and winter, if Americans act responsibly, if state and local officials take the right public health measures, and he says you can do all this without shutting the country down.

We should also note, Wolf, we found out a short time ago Dr. Fauci is going to be among the first people to see the data, the critical data that's going to tell the country whether one of those coronavirus vaccines is safe.

He is going to be among the first top experts to look at that critical data in the weeks ahead.

BLITZER: Yes. Certainly, we trust Dr. Fauci and his team very, very seriously.

Brian Todd reporting for us, thank you very much.

I want to bring in our chief medical correspondent, Dr. Sanjay Gupta, for analysis.

[18:10:00]

63,000 new infections here in the U.S. just yesterday.

The head of the National Institutes of Health, Dr. Francis Collins, just told me in the last hour he expects the daily death toll to start rising as well.

Just how dangerous, Sanjay, are these high numbers that we're seeing explode right now?

DR. SANJAY GUPTA, CNN SENIOR MEDICAL CORRESPONDENT: Well, it's very concerning, Wolf.

Obviously, if you're starting off this sort of -- this wave going into the colder weather at this high a level of viral transmission, it's just a lot that you all of a sudden can build on. If you're starting at a lower level, it takes a while to get into that sort of exponential growth.

Starting at 50,000, 60,000 newly infected people a day, if they're each potentially spreading it to two or three, you can see how significant a number that can reach quickly.

Wolf, one of the big concerns is just hospitals, right? And these are the same conversations you and I were having back in March and April. Hospital bed capacity is something that hospitals, cities are looking at all over the country right now.

And, typically, around this time of year, it's around 60 percent or so full. If we can show the map here, but in many many states around the country, hospital occupancy is already quite high. So if you're already high and going into flu season, going into

coronavirus season or worsening coronavirus season, I should say, that's a concern, Wolf. I mean, that's why a lot of planning is going on in these communities now, to say what happens if we are starting to run out of space?

Wisconsin is building these tents, these field hospitals. It's dangerous, Wolf, and a lot of planning now going into place to try and avert some of these -- some of the more tragic problems here.

BLITZER: Because, as you know, the U.S. surgeon general today warned that Wisconsin clearly going in the wrong direction, the state's positivity rate nearly 23 percent.

GUPTA: Well, let me just remind you why positivity rate is such an important thing to look at, so positivity rate of 23 percent. Out of 100 people that were tested, 23 came back positive.

What does that mean? Why is that so concerning? Well, that means that if you're getting that many coming back positive, that means you're missing a lot more people who aren't getting tested.

It's kind of like if you go fishing with the net. Put the net down, you grab a bunch of fish, you think, oh, I grabbed a bunch of fish, there must be a lot more fish down there. It's the same sort of thing with positivity rate.

So why is it dangerous, then, in a community that has high positivity rate? Well, you ask yourself, if you go out, what is the likelihood you're going to come in contact with someone who is carrying the virus? It's much higher if you have a positivity rate of over 20 percent, like we're seeing in Wisconsin.

So, you go to a rally, you're next to people, closely clustered, longer than 15 minutes. If people aren't masked, they're putting that virus into the air, outside safer than inside, but that's still a lot of virus within a rally or any kind of gathering like that. And that's the big concern.

So, even aside from anything else that's going on, in the middle of a pandemic, bringing large groups of people together is a bad idea, Wolf. It's been a bad idea for months now. We know this, and the numbers are even worse now than they were before.

BLITZER: Yes, even if it's outside, you should engage in social distancing and certainly wear a mask to protect yourself and protect everyone else.

Pfizer now says, Sanjay, that it will request an emergency use authorization for its potential coronavirus vaccine by the third week in November, if it gets positive data, no guarantee, but potentially the third week in November.

What hurdles does this vaccine need to pass?

GUPTA: You know, it's basically two hurdles. And I will preface by saying nobody knows what the data is, yet except for this independent entity known as the Data Monitoring Safety Board.

effective, this vaccine, and if two months of safety data don't show significant adverse effects.

If it crosses those two hurdles -- and Pfizer, again, they haven't seen the data, but they anticipate by middle of November that the data will be there. And if it's positive, they're going to go ahead and apply for this emergency use authorization.

That's sort of been the plan all along. But I want to again emphasize, as promising as things have been, and I'm quite optimistic about it, as there are many people, we still haven't seen the data. We have got to see that this vaccine actually works and isn't having adverse effects.

BLITZER: Got to make sure it's effective, but also we got to make sure it's safe and the side effects are really, really minimal.

GUPTA: Yes.

BLITZER: All right, Sanjay, thank you very, very much, Dr. Sanjay Gupta, always joining us with his expertise.

Just ahead: Joe Biden now says President Trump is -- quote -- "living in a dream world" after repeatedly claiming the coronavirus is about to disappear.

[18:15:00]

And, later, we will have more on the president's refusal to condemn a dangerous conspiracy theory labeled a domestic terror threat by the FBI.

(COMMERCIAL BREAK)

BLITZER: Joe Biden is taking his presidential campaign to the battleground state of Michigan in a bid to rebuild what's called the blue wall President Trump's shattered back in 2016.

CNN's Jessica Dean is tracking the Biden campaign for us. She's joining us from Michigan right now.

So, Biden is going directly after the president, Jessica, in a very, very tough -- with tough words.

health care and the Affordable Care Act really central to his closing argument here in Michigan.

[18:20:00]

He and his campaign believing that has a through line to so many issues, including Amy Coney Barrett's nomination to the Supreme Court, Republicans' efforts to dismantle the ACA, and then, of course, the coronavirus and Trump's response to the coronavirus.

Take a listen.

(BEGIN VIDEO CLIP)

BIDEN: He is still living in a dream world. He keeps telling us that this virus is going to disappear like a miracle. He said, I think, last night in his town hall -- I didn't have the pleasure of hearing it. I was doing one myself.

He said, we have turned the corner.

As my grandfather Finnegan might say were he here, he said, he has gone around the bend.

(LAUGHTER)

BIDEN: Turned the corner. My lord.

It's not disappearing. In fact, it's on the rise again. It's getting worse, as predicted. We all know the terrible price this nation has paid.

(END VIDEO CLIP)

DEAN: Meantime, at his town hall last night in Philadelphia, Joe Biden talking about a question he's dodged for weeks now. And that's whether he supports packing the Supreme Court.

He has said that he doesn't want to give that answer because it's a distraction. He said last night he promised to give his answer on that before Election Day.

making sure people turn out to the polls.

We learned today, Wolf, that Vice President Biden's perhaps biggest surrogate out there, former President Barack Obama, will hit the campaign trail for him in Philadelphia next week.

BLITZER: Eighteen days to go until November 3, Election Day, but millions, more than 20 million Americans already have voted.

All right, Jessica, thank you very much.

Let's bring in our political correspondent, Abby Phillip, and CNN political commentator Bakari Sellers. He's the author of the new book "My Vanishing Country: A Memoir."

Abby, CNN has learned that the former White House chief of staff, retired General John Kelly, has told friends tha President Trump, in his words, "is the most flawed person I have ever met in my life."

Given these very strong feelings, why won't the president's former chief of staff simply come out publicly to explain to the American people why he's so concerned about his former boss' character?

ABBY PHILLIP, CNN WHITE HOUSE CORRESPONDENT: Yes, I think that is the question.

And it's one that really I don't have a great answer to. It's not clear to me why John Kelly, who does not have a good relationship with this president and hasn't for a very, very long time, why he won't just simply say publicly what he's saying privately.

The only thing that I can gather, from my understanding of how John Kelly is as a person from people who know him, is that he is kind of a circumspect person publicly. He doesn't want to get deeply involved in the political drama.

But, at the same time, he's obviously painting a very dire picture of this person that he used to work for. And I think it stands to reason that he -- if he felt so strongly about it in private, he ought to let the public know publicly, because he's one of the people, one of the few people who has been so close to this president, worked for him for many years.

BLITZER: Yes, so many of the president's former advisers are saying similar things.

Bakari, we have also just learned that former President Obama will make his first campaign stop for Joe Biden next Wednesday in Philadelphia, Pennsylvania being a key battleground state.

This marks a long-awaited moment for the Biden campaign, doesn't it?

BAKARI SELLERS, CNN CONTRIBUTOR: It does, I mean, and I know that Joe Biden has to feel amazing to have his former boss out on the campaign trail.

Look, Barack Obama is the most popular politician in the entire country. He's the big dog. And so, when you roll him out, I mean, it's going to be energy abound for this campaign. It's going to be new wind beneath its sales, if it needs it.

Barack Obama is someone who's going to pitch a message, much like Joe Biden, of unifying this country, of bringing this country together, whether or not you're in North Carolina, or whether or not you're in Ohio or Pennsylvania. He's someone, a lot like John Kelly knows Donald Trump, Barack Obama knows Joe Biden, and he will be able to speak to his character, he will be able to speak to his fortitude and who he is.

And he will also be able to talk about a vision for this country moving forward. I'm so excited about having Barack Obama on the trail. The Republican Party doesn't have anything like it.

I mean, Larry Hogan had to vote for Ronald Reagan today.

BLITZER: Yes, the governor of Maryland. And he made a point by saying he was voting for Ronald Reagan, a symbolic statement, indeed.

And we do know that President Obama has a huge following out there to get out the vote, which will be so, so critical in this election.

Abby, only 18 days to go. We're seeing a president very much on the defensive right now. What do the locations of President Trump's campaign stops reveal to you about how his team is viewing this race with only a few days left?

PHILLIP: Well, I think probably the only thing that you need to know about how the president's team is viewing this race is where he is tonight, where he's heading right as we speak, Macon, Georgia.

He's going to Georgia to try to defend that state that he won the last time around. That should be a state that he should be able to win this time around if he were in a strong position.

He was also campaigning in North Carolina, another state. He should be able to at least, if he were in a strong position, he -- as a Republican, he ought to be able to win that state pretty easily without investing resources in the last 20 days.

This is a president who is defending a map and a very narrow path to victory. And that narrow path may very well require that he wins North Carolina. It will also require that he wins Florida, which is a state that he's been campaigning in recently as well.

And so the Trump campaign, despite what the president is saying, knows that this is a map that is not trending in their direction. They're not in the position to expand the map. They are only trying to defend what they did last time around.

And I think that defensive territory is actually a much broader territory than they would like it to be at this point.

BLITZER: Very important, indeed.

All right, Abby Phillip and Bakari Sellers, guys, thanks very much.

An important and quick programming note for our viewers: Tune in this weekend for an inside look at the Trump presidency from those who worked for the president, Jake Tapper, a CNN special report, "The Insiders: A Warning From Former Trump Officials." That will air Sunday 9:00 p.m. and midnight, 9:00 p.m. and midnight Eastern, right here on CNN, right after our special edition of THE SITUATION ROOM.

Just ahead, we will have more on President Trump's embrace of yet another dangerous conspiracy group, QAnon, which the FBI calls a domestic terror threat. And, later, Congressman Adam Schiff is standing by to join me live

We will be right back.

(COMMERCIAL BREAK)

[18:30:00]

BLITZER: Anti-extremist organizations are sounding the alarm after President Trump refused to condemn QAnon a conspiracy group that's been labeled a domestic terror threat by the FBI.

Let's continue the discussion with the CEO of the Anti-Defamation League, Jonathan Greenblatt. Jonathan, thanks so much for joining us.

Let me remind you and our viewers what the president said about this dangerous group last night. Watch this.

(BEGIN VIDEO CLIP)

TRUMP: I know nothing about QAnon. I know very little.

GUTHRIE: I just told you.

TRUMP: You told me, but what you told me doesn't necessarily make it fact, I hate to say that. I know nothing about it. I do know they are very much against pedophilia. They fight it very hard. But I know nothing about it.

REPORTER: They believe it is a satanic cult run by the DNC.

(END VIDEO CLIP)

BLITZER: He's clearly not condemning this conspiracy theory. The president of the United States actually encouraging a totally insane movement out there as he pour -- pouring fuel on the fire, Jonathan.

JONATHAN GREENBLATT, CEO, ANTI-DEFAMATION LEAGUE: Yes. You know, Wolf, as I said last night, as soon as I saw that, it is shockingly irresponsible that President Trump refused to disavow QAnon, which, as you

And, look, the most generous thing I can say here tonight is that claiming ignorance is just absolutely unacceptable. When you're the president of the United States, you just can't credibly say, I don't know who David Duke is or I don't know who the Proud Boys or I don't know what QAnon is, particularly when the president is on record is saying he watches cable television news all the time. I mean, obviously, he knows exactly who these people are, Wolf.

And if you're not willing to call out a domestic terror threat, a group that wants to cause violence to the home land I mean, that's a dereliction of duty at best.

BLITZER: Yes. The other day, he said the -- he said this. He said, well I don't know much about the movement other than I understand they like me very much, which I appreciate. So he knows at least that much, and it's pretty shocking that he simply can't condemn this organization. Tell us why they're so dangerous.

GREENBLATT: Well, look, QAnon started in about 2017 on a service called 4chan. And, again, it is a sort of a shadowy conspiracy movement. I think their followers are probably in the tens of thousands. But they believe there is a deep state conspiracy, again, run by cabal of pedophiles. And their lunatic rantings have sort of move from the sewers of the internet, Wolf, into mainstream politics, in large part because of moments last night.

You know, at the ADL, we track extremists. And I can tell you, on QAnon boards today, we watch them. And thes extremists believe last night was a huge win. They think it was a win because simply being discussed on a platform like, you know, a broadcast news program, to them, feels like a victory.

And when President Trump claims he doesn't know what they are but actually states what they believes as their core purpose, fighting imaginary satanic pedophiles, they think he is code -- you showing them code.

[18:35:05]

He is approving of them. And that's why they feel emboldened today.

And, look, like I said a moment ago, whether it was a QAnon enthusiast trying to attack a pizza parlor in D.C. or other acts of violence, these people are dangerous and they don't deserve to be dignified by the president of the United States or anyone in public life.

concern?

GREENBLATT: Again and again. We've spoken to people at the highest levels of government publicly and privately to explain that in order to eliminate this kind of threat, you've got to denounce it clearly and cogently.

But I must say, I mean, I've never had a moment like this before that I have seen in public life. There are plenty of responsible politicians on both sides of the aisle. But when the president himself signals that this is somehow normal, that it's just simply a group he's not aware of, I've got to say it sends them a signal. They feel emboldened by this.

They already think, Wolf, that the president is re-tweeting their memes, right? And a lot -- and suggesting there somehow normal, it is giving them the entree they are looking for into American public life.

BLITZER: All right, Jonathan thanks very much. Jonathan Greenblatt of the ADL, I appreciate you joining us. We're going to stay on top of this story for our viewers.

Just ahead, I'll speak live with Congressman Adam Schiff about a new probe into a potential Russian disinformation campaign targeting Joe Biden and his son, Hunter.

Plus, multiple states are now reporting a huge surge in early voting. Will 2020 set a record for turnout? We'll be right back.

(COMMERCIAL BREAK)

[18:40:00]

BLITZER: Federal authorities, including the FBI, are investigating whether recently published emails that purport to deal -- to detail, I should say, the business dealings of Joe Biden's son, Hunter, are connected to an ongoing Russian disinformation effort targeting the Biden campaign in the days leading up to the election.

Let's discuss with the Chairman of the House Intelligence Committee, Congressman Adam Schiff. Congressman, thanks so much for joining us.

REP. ADAM SCHIFF (D-CA): Well, we know that this whole smear on Joe Biden comes from the Kremlin. That' been clear for well over a year now that they've been pushing this false narrative about the vice president and his son.

And, you know, the idea that the president, that the White House Counsel and others were made aware that Giuliani was being used by Russian intelligence and using Russian intelligence in the sense of meeting with an agent of the Kremlin and pushing out this Kremlin false narrative, the idea that they were knowing and still on the floor of the Senate during the impeachment trial, pushing this Kremlin narrative is pretty breathtaking.

But I guess at this point we can't be shocked by anything this administration does, no matter how craven. But, clearly, the origins of this whole smear are from the Kremlin, and the president is only too happy to have Kremlin help and try to amplify it.

BLITZER: It's not like Rudy Giuliani is peddling this information in a vacuum, Congressman. Take a look at this picture of the president in the Oval Office holding up a copy of the New York Post touting this conspiracy theory. It's made its way all the way to the commander in chief with a big smile on his face.

SCHIFF: Yes. Well, look, I think we know who the driving force behind this smear has been all along and it's beer the president and the Kremlin. The Kremlin has an obvious interest in denigrating Joe Biden. They want Donald Trump to win.

They recognize he's a weak president. He's been utterly unwilling to stand up to Putin and other autocrats. He has diminished NATO. He has criticized and weakened our alliance with our transatlantic partners. He's been the gift that doesn't stop giving for the Kremlin. So, clearly, they want to help him. So they want to denigrate the vice president. The Intelligence Community has made that abundantly clear.

And this particular smear though has also been acknowledge to come from the Kremlin, and there it is from the Oval Office, another wonderful propaganda coup from Vladimir Putin, seeing the president of the United States holding up a newspaper promoting Kremlin propaganda. It's really incredible.

BLITZER: The Washington Post, as you saw, is reporting that when the president was actually warned of concern about Giuliani, where he was getting all this information, warned by U.S. intelligence, law enforcement

SCHIFF: Well, it's a big part of the problem. And we know for a long time, look, Rudy Giuliani doesn't, you know run the president, the president runs Rudy Giuliani. Giuliani is doing the president's bidding. He was doing the president's bidding late last year and earlier this year in Ukraine.

[18:45:02]

He was doing the president's bidding when he was pushing out this smear and trying to get the Ukrainians to push out this smear of his opponent because he was deathly afraid of being exactly where we are right now, which is less than three weeks from the election, losing badly to Joe Biden.

But the fact that he would continue to do it, I guess at this point shouldn't surprise us. But this is the story of Donald Trump -- utter unwillingness to stand up to the Kremlin, willingness to use their help no matter how dishonest or disreputable, a willingness to undermine our own elections by getting Kremlin help and amplifying it And there's only one remedy at this point and that's to vote him out.

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

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

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

But we do know this: the Russians are once again actively involved in trying to denigrate the vice president, Donald Trump is helping them, and we know that they are amplifying the president's misinformation about absentee ballots.

This is another gift the president is giving the Russians. Unlike 2016 when the Russians had to make up this stuff,

fair election. The Kremlin just has to push out that false narrative by the president of the United States.

BLITZER: Congressman Adam Schiff, thank you so much for joining us.

SCHIFF: Thank you, Wolf.

BLITZER: All right. Just ahead, more than 20 million general election ballots have already been cast here in the United States as more states report record increases in early voting.

We'll be right back.

(COMMERCIAL BREAK)

[18:52:10]

BLITZER: With just 18 days to go until the election here in the United States, states across the country are seeing huge turnout for early voting. And we're learning more about how many Americans have already cast their ballots

CNN's senior White House correspondent Pamela Brown is tracking all of this for us.

(BEGIN VIDEOTAPE)

UNIDENTIFIED FEMALE: I see it as probably being one of the most important elections in my lifetime going forward.

PAMELA BROWN, CNN SENIOR WHITE HOUSE CORRESPONDENT (voice-over): And it seems she's not alone. Not by a long shot.

More than 20 million Americans have already voted according to data from 45 states and Washington, D.C. analyzed by CNN, Edison, and Catalyst.

In North Carolina, these long lines on the first day of early voting Thursday were the first indicator of huge turnou in the Tar Heel State. The state board of elections is tweeting that more than 330,000 voters cast ballots on day

In Georgia, they've seen a 62 percent increase in early, in-person voters compared to the same time four years ago. A similar story in Tennessee, where early voting in person or by mail started yesterday. And they've already seen a 91 percent increase compared to 2016. UNIDENTIFIED FEMALE: I think more of the millennial and younger are a

little bit more aware and maybe are more wanting to get out there and more aware of the issues.

BROWN: In Pennsylvania, the secretary of state says she expects that full results from mail-in ballots won't be available until the Friday after Election Day.

KATHY BOOCKVAR, PENNSYLVANIA SECRETARY OF STATE: Sometimes you might have an omission or an illegible postmark, received three days later, they can be counted.

BROWN: And in Michigan today, the secretary of state there announcing that people can't carry guns on election day at polling places, saying in a statement she's, quote, committed to ensuring all eligible Michigan citizens can freely exercise their fundamental right to vote without fear of threats, intimidation, or harassment."

UNIDENTIFIED FEMALE: I don't feel he's been treated fairly by the Democrats at all.

BROWN: In Florida, the edge Democrats have in voter registration is narrowing. New data from the state shows about 134,000 more Democrats are registered to vote than Republicans, which is down from 2016, when they led by about 327,000.

And in California --

UNIDENTIFIED FEMALE: You know what? It's not -- you can't just trust anybody right now.

BROWN: That frustration, part of a week-long drop box drama, which today appears to have been ended. The secretary of state announcing this afternoon the California Republican Party agreed to no longer deploy these unofficial ballot drop boxes, which were found in at least four counties.

[18:55:03]

ARNOLD SCHWARZENEGGER (R), FORMER CALIFORNIA GOVERNOR: It's a stupid thing they're doing right now with these ballot boxes.

(END VIDEOTAPE)

BROWN: And, Wolf, in Florida, election officials are taking steps to remove ex-felons who owe court debts from the voter rolls. Of course, this comes after a Democratic led effort to raise millions of dollars to pay off those -- that debt that the court debt to those ex-felons can vote after a ruling earlier this year. But now, we're learning election officials are taking steps to remove those ex-felons who owe debt from the voter rolls.

BLITZER: All right. Pamela Brown, thank you very much.

And we'll have more news right after this.

(COMMERCIAL BREAK)

BLITZER: I'll be back for a special edition of THE SITUATION ROOM tomorrow, 6:00 p.m. Eastern.

Until then, thanks for watching.

"ERIN BURNETT OUTFRONT" starts right now.

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EXHIBIT J

- OPINION
- REVIEW & OUTLOOK

All the Adam Schiff Transcripts

Newly released documents show he knew all along that there was no proof of Russia-Trump collusion.

By
The Editorial Board
May 12, 2020 7:29 pm ET

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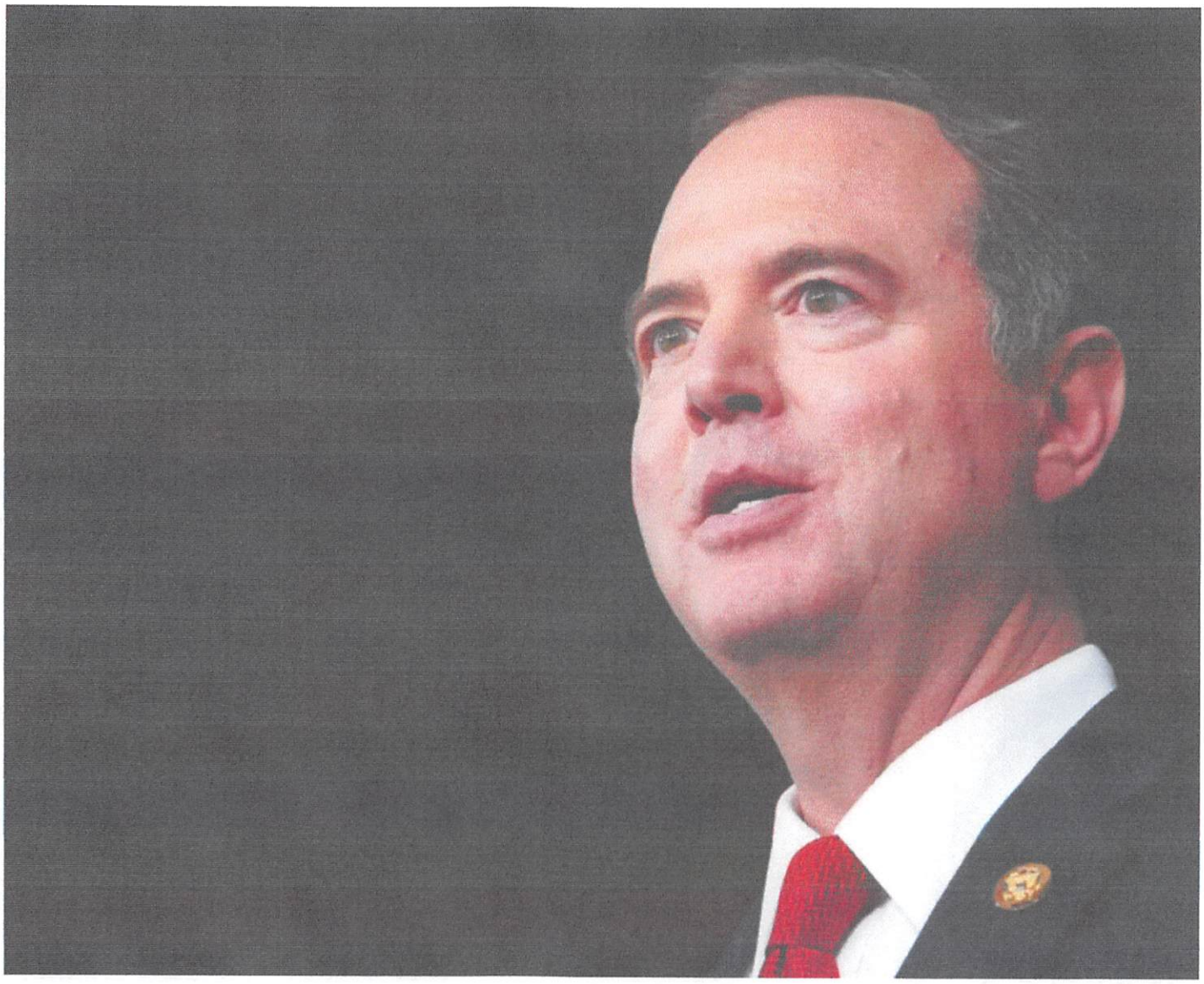

Newly released documents show he knew all along that there was no proof of Russia-Trump collusion.

By
The Editorial Board
May 12, 2020 7:29 pm ET

Rep. Adam Schiff on Jan. 28.
PHOTO: JACQUELYN MARTIN/ASSOCIATED PRESS

Americans expect that politicians will lie, but sometimes the examples are so brazen that they deserve special notice. Newly released Congressional testimony shows that Adam Schiff spread falsehoods shamelessly about Russia and Donald Trump for three years even as his own committee gathered contrary evidence.

The House Intelligence Committee last week released 57 transcripts of interviews it conducted in its investigation into Russia's meddling in the 2016 election. The committee probe started in January 2017 under then-Chair Devin Nunes and concluded in March 2018 with a report finding no evidence that the Trump campaign conspired with the Kremlin. Most of the transcripts were ready for release long ago, but Mr. Schiff oddly refused to release them after he became chairman in 2019. He only released them last week when the White House threatened to do it first.

Now we know why. From the earliest days of the collusion narrative, Mr. Schiff insisted that he had evidence proving the plot. In March 2017 on MSNBC, Mr. Schiff teased that he couldn't "go into particulars, but there is more than circumstantial evidence now."

In December 2017 he told CNN that collusion was a fact: "The Russians offered help, the campaign accepted help. The Russians gave help and the President made full use of that help." In April 2018, Mr. Schiff released his response to Mr. Nunes's report, stating that its finding of no collusion "was unsupported by the facts and the investigative record."

None of this was true, and Mr. Schiff knew it. In July 2017, here's what former Director of National Intelligence James Clapper told Mr. Schiff and his colleagues: "I never saw any direct empirical evidence that the Trump campaign or someone in it was plotting/conspiring with the Russians to meddle with the election." Three months later, former Obama Attorney General Loretta Lynch agreed that while she'd seen "concerning" information, "I don't recall anything being briefed up to me." Former Deputy AG Sally Yates concurred several weeks later: "We were at the fact-gathering stage here, not the conclusion stage."

The same goes for the FBI agents who started the collusion probe in 2016. Most remarkable, former FBI Deputy Director Andrew McCabe admitted the bureau's reason for opening the case was nonsense. Asked in December 2017 why the FBI obtained a secret surveillance warrant on former Trump aide Carter Page, rather than on George Papadopoulos (whose casual conversation with a foreign diplomat was the catalyst for the probe), Mr. McCabe responded: "Papadopoulos' comment didn't particularly indicate that he was the person that had had—that was interacting with the Russians." No one else was either.

On it went, a parade of former Obama officials who declared under oath they'd seen no evidence of collusion or conspiracy— Susan Rice, Ben Rhodes, Samantha Power. Interviews with Trump campaign or Administration officials also yielded no collusion evidence. Mr. Schiff had access to these transcripts even as he claimed he had "ample" proof of collusion and wrote his false report.

He's still making it up. Last week he said the transcripts contain "evidence of the Trump campaign's efforts to invite, make use of, and cover up Russia's help in the 2016 presidential election."

The question we'd ask our friends in the media is when are they going to stop playing the fool by putting him on the air? Mr. Schiff is a powerful figure with access to secrets that the rest of us don't have and can't check. He misled the country repeatedly on an issue that consumed American politics.

President Trump often spreads falsehoods and invents facts, but at least he's paid a price for it in media criticism and public mistrust. An industry of media fact checkers is dedicated to parsing his every word. As for Mr. Schiff, no one should ever believe another word he says.

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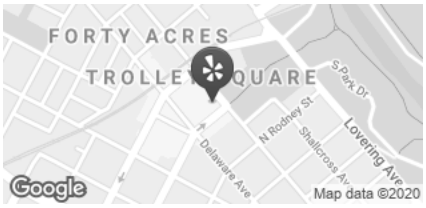

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Michelle H.
Owatonna, MN
0 friends
12 reviews

10/15/2020

Look at all the infantile haters, liberals that want to tank a business because they don't want any negative news about their racist geriatric president wanna be.
Poor things, Biden is EVERYTHING they accuse President Trump of.
It would be cute, if it wasn't so pathetic to watch.

Useful **45** Funny **38** Cool **13**

Jeff Y.
Los Angeles, CA
34 friends
26 reviews
1 photo

10/14/2020

1 photo

I was visiting from out of town for a business meeting when my laptop mysteriously stopped booting. Somewhat frantic, I went on line with my iPhone to try my luck with a local repair shop and relieved, I located a business that advertised themselves as Mac specialists. It was The Mac Shop.

Ordinarily I would only trust Apple with my device and my data, but with no Apple Store in the area, I had no time to waste, so I settled for second best. Walking into the store I was a little taken about, which gave me pause. It was a dingy and dilapidated, with dudes speaking in hushed tones in what sounded like Russian accents. The place looked like a Mac graveyard with with some Macs dating back 30 years, with no sighting of any Mac newer than 10 years. Oddly, they had Trump2020 campaign banners everywhere, a guy wearing a Q'Anon T-shirt was chatting with who seemed to be the owner, and the ever-present Fox News was loudly blaring on a TV in the background. Some ghoulish looking figure that appeared a lot like Rudy Giuliani was being interviewed by one of those gabby, flatulent Fox News TV hosts.

Because I was in a hurry, I went against my better judgement and abruptly handed my laptop over to some guy named Igor (He kept calling me Hunter for some reason). When I asked for a receipt, he assured he would email it to me if I only gave him my email address and laptop password, and only after he had could take a good look at my hard drive, whatever that meant. He quickly corrected himself and stated that he meant after only after he could do a thorough review of my system. By that time Igor seemed to be perspiring a bit. It was very odd.

When I phoned later that day only to be told that my hard drive would need to be replaced and OS re-installed. As a customer courtesy, they offered to securely dispose of any used parts, free of charge. I politely

declined and asked that they return all replaced parts, please. With no other good options, I reluctantly agreed, and was told to come back by the end of the day. I arrived just as they were closing for the day. As they reached over the counter to hand me my newly repaired laptop, I asked about my faulty hard drive. They apologized profusely and explained that during the course of the repair the hard drive was damaged and could not be saved and disposed of immediately because it was an environmental risk. Astonished, and speechless, I was resigned to leave without it, and turned to leave and that's when I heard it.

From Igor's pocket to the the floor rocketed out what was likely my old hard drive, hitting the floor with a loud thud. It had the word "Hunter" written on it in red marker. I had no idea who or what this Hunter was but I just shrugged my shoulders and headed out as fast as my legs would carry me.

Next time, I think, I will just go to the Apple Store.

Useful **67** Funny **104** Cool **15**

Courtney C.
Oklahoma City, OK
128 friends
20 reviews
3 photos

10/14/2020

Do not recommend.

Pros: might be good at recovering data
Cons: might give your data to Rudy Giuliani and share it with the New York Post

Useful **121** Funny **92** Cool **19**

Roger J.
Waltham, MA
0 friends
3 reviews

10/15/2020

BE CAREFUL WITH THIS SHOP! They copy all your data and then will share it with whoever they want! Very unethical business practices. They steal the data off the hard drive by imaging it without your knowledge they can gain access to all your banking information , social security numbers, passwords, you name it .

Useful **86** Funny **23** Cool **7**

Kyle K.
Kent, WA
102 friends
7 reviews
2 photos

10/14/2020

They like to hack their customers computers and inject themselves erroneously into politics. - tied to corrupt lawyers who work with Known Russian spies and agents.

Useful **100** Funny **35** Cool **7**

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Devon E.
Manhattan, NY
3 friends
26 reviews

10/14/2020

I came in to get my waterlogged laptop fixed, but then forgot to come by and pick it up. Thankfully, the lovely owner of this store decided to snoop through my files, then call the FBI, clone my hard drive and give a copy to Rudy Giuliani. I knew I shouldn't have put that "Beau Biden Foundation" sticker on it!

Useful **88** Funny **53** Cool **9**

Jill S.
Portland, ME
100 friends
97 reviews
12 photos

10/14/2020

It's a pass for me. You drop off your laptop for repair and the next thing you know fake emails have been created and given to Rudy Giuliani. What a headache.

Useful **78** Funny **43** Cool **6**

Pretzelcuatl L.
Los Angeles, CA
3 friends
64 reviews
9 photos

10/14/2020

Yep, this is the place where you want to take your computer if you want the shop owner to turn your data over to vampire Rudy Giuliani so he can use it to destroy your life. True story.

Useful **71** Funny **23** Cool **4**

E P.
Amherst, MA
1 friend
68 reviews
4 photos

10/14/2020

It's amazing how far some people will go to sell out their own country. Can't recommend this shop unless you enjoy pc repairs with a side of treason.

Useful **67** Funny **24** Cool **3**

Sandy K.
Glen Mills, PA
0 friends
3 reviews

10/14/2020

If you want your data stolen and sold to the Russians, Rudy Giuliani and Rupert Murdoch, this is the place for you. If you want honest repair service go somewhere else.

Useful **69** Funny **17** Cool **4**

B R.
San Francisco, CA
0 friends
1 review

10/14/2020

I brought my Mac here to get fixed and the Owner, John Paul Mac Isaac (If only the "Mac" was a biblical name, maybe thats where he went wrong?) took my Computer and falsified some documents on it. He then alerted the FBI about the falsified emails. When I asked him about it he just started yelling SETH RICH and OBAMAGATE and started turning RED while muttering "maga" over and over again. SCARY SITUATION. Im going to recommend a more "level headed" and "ethical" repair shop, to get your work done at.

Useful **64** Funny **26** Cool **5**

Dalia S.
Central LA, Los Angeles, CA
0 friends

10/14/2020

This business cannot be trusted to safeguard your private data on your computer. They rifle through your private files on your computer

3 reviews

looking for salacious or incriminating information and then make copies of it and turn it over to your rivals. Beware of this unethical business!

Useful 60 Funny 12 Cool 2

Matt B.
Hockessin, DE
0 friends
4 reviews

10/15/2020

Apparently your data is not secure with this store. Too bad, we all expect that as a minimum.

Useful 55 Funny 10 Cool 2

Jason T.
Wilmington, DE
4 friends
82 reviews

10/15/2020

Owner claims to have stolen information off a computer, reported it to a friend who reported it to Rudy who then reported it to the NY Post. Mind you the person he stole the information from hasn't lived in Delaware for years. If you want someone looking around your stuff and reporting it to third parties, come here!

Useful 53 Funny 10 Cool 3

Mike D.
Wilmington, DE
13 friends
12 reviews
1 photo

10/15/2020

Apparently they aren't very big on privacy issues. Go elsewhere if you want your personal info to remain private.

Useful 52 Funny 8 Cool 2

Ryan G.
Wilmington, DE
6 friends
4 reviews

10/15/2020

John Paul will even make free copies of your hard drive, without you even asking, and hand them over to others just to make sure everyone is safe! No charge. (Edit - allegedly based on his interview with multiple media outlets)

Swell guy

-

Useful 47 Funny 11 Cool 3

Bill D.
Avondale, PA
0 friends
1 review

10/14/2020

True patriots here. Sharing the truth about crooked hometown politicians who are selling out our country for personal gain. Supports American freedom not communist sellots!

Useful 33 Funny 33 Cool 15

Jordan H.
Rhodes Ranch, Las Vegas, NV
0 friends
4 reviews
2 photos

10/14/2020

Great place! They fixed my laptop on the spot. Minimal charge. A lot cheaper than Apple! Highly recommended! This place is as good as it gets!

Useful 26 Funny 19 Cool 9

Dave K.
Palos Verdes Peninsula, CA
0 friends
15 reviews
2 photos

10/14/2020

This guy is the greatest. If you're a soft leftist cuck, you can eat another bag of dicks.

Useful **13** Funny **13** Cool **5**

Dale D.
Dover, DE
11 friends
2 reviews

10/14/2020

In these very divisive times it's important to know what your consumer spending supports. If you believe it should go to a propaganda campaign to prop up the current "president", you found your match. If you however believe in the actual principles that Apple was founded upon likely best to look elsewhere. Personal choice is a core principle of our country, but lets at least know as much as we can about who/what our dollars are supporting.

Useful **16** Funny **4** Cool **1**

1 2 3 ›

1 of 3

45 other reviews that are not currently recommended

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in It Services & Computer Repair

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Yelp users haven't asked any questions yet about **The Mac Shop**.

Ask a Question

Recommended Reviews

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Sort by **Yelp Sort**

Start your review of **The Mac Shop**.

Jason M.
Gilbert, AZ
0 friends
6 reviews
4 photos

10/14/2020

As a person that has worked in IT for almost 30 years, my integrity is as important as my technical experience. I am trusted with highly sensitive data on a daily basis. My customers depend on their data being secure and trust me to make sure it isn't stolen or compromised. Only if I found something that was illegal or against company policy, would I turn it over, and I would only turn it over to the proper authorities. Hopefully, there is a lawsuit because this person should not be trusted with people's data.

Useful **79** Funny **16** Cool **6**

RJ K.
Ebensburg, PA
4 friends
7 reviews
1 photo

10/14/2020

Owner was paid off by Trump cronies. Can you really trust this kind of place to handle your hardware?

Useful **69** Funny **14** Cool **4**

Patrick D.
Phoenix, AZ
0 friends
9 reviews

10/14/2020

Owner invaded privacy by copying hard drive and turning it over to opposing party for political purposes. Don't trust this dude with your private data. Owner is Trump supporter who admits to copying Hunter Biden's hard drive and giving it to Rudy Giuliani. I don't care who you support--would you want your computer repair person copying your hard drive?

Useful **61** Funny **13** Cool **4**

Kurt Z.
Arlington, VA
2 friends
4 reviews

10/14/2020

This guy makes copies of customer hard drive and and sells them to political operatives. I don't give a crap if you like Biden or not, what a violation or trust and privacy.

Useful **59** Funny **8** Cool **3**

Jenn R.
Manchester, NH
9 friends
13 reviews

10/14/2020

Owner is on record with news agencies admitting he rifled through personal data that was not his, copied information, and gave that information to multiple people. You can't trust someone like that with your computer

Useful 56 Funny 9 Cool 2

Gina R.
Lamont, CA
1 friend
11 reviews
1 photo

10/14/2020

I like computer repair shops that I can trust. I do not know what Igor has stepped in, but it is smelling like he needs to bathe the stench off himself and do a better job as a human. Rudy did him no favors as now he will be scorned in all of society for getting involved in a sham situation.

Useful 51 Funny 11 Cool 2

Sally T.
Seattle, WA
0 friends
100 reviews

10/15/2020

Do not use this place. They have been known to spy on information in your computer and have guarantee no privacy. Watch out!

Useful 39 Funny 5 Cool 1

Ray M.
Brooklyn, NY
0 friends
15 reviews
1 photo

10/14/2020

I came to Mac Shop to have my laptop fixed after spilling liberal tears all over the keyboard. Great service in recovering the damaged laptop. Will come again

Useful 20 Funny 22 Cool 7

Luke G.
Davis, CA
497 friends
1 review

10/14/2020

They'll fix your computer & help us expose corrupt politicians like sleepy joe. Doesn't get much better than that.

Useful 20 Funny 18 Cool 7

Peter L.
Los Angeles, CA
47 friends
47 reviews
1 photo

10/14/2020

thedailybeast.com/man-wh...

Useful 23 Funny 4 Cool 1

D C.
SYLMAR, CA
0 friends
1 review

10/15/2020

Maybe the owner of the shop can locate Hillary's thousands of "accidentally" deleted emails. Also, maybe he could assist the FBI in helping them retrieve the "accidentally" forgotten phone passwords of all the crooked FBI agents involved in the Russian propaganda scam against the President and the USA. "Joey/Hunter/Barry, you've got some 'splaining to do!"

Useful 12 Funny 22 Cool 4

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uBreakiFix

5

23.8 miles

Get your device diagnosed for free at uBreakiFix Glassb us a call on... read more

Ben W.
Atlanta, GA
0 friends
1 review

10/14/2020

The owner proudly makes copies of your hard drive without consent for blackmail purposes. Not even remotely trustworthy.

Useful **11** Funny **3** Cool **2**

Kate H.
New York, NY
0 friends
8 reviews

10/15/2020

I should really give this place more than one star... because, allegedly (according to the NY Post article), you can drop off a water damaged laptop there for repairs without even putting a dime down as a deposit. Interesting. Every time I've brought my computer into an authorized Mac repair shop I've had to pay for both parts and labor upfront...then signed a form with my name and credit card info in case more parts were needed. It seems that the way THIS man supposedly runs his shop is "I don't know you, I don't know your name, I don't need to know your name, I give you no receipt with your name on it for pick up or keep a duplicate receipt attacked to your laptop and I don't need any form of payment given before doing hundreds of dollars of work for you." Very odd business model, no? Or, at least an awkward business model if you're desperately trying to frame a presidential candidate. Good luck with that...you just trashed your own small business!

Useful **11** Funny **4** Cool **2**

Jen Z.
Bear, DE
21 friends
8 reviews

2/17/2020

I have made numerous mistakes with my Mac, including downloading malware and pushing an old MacBook Pro beyond it's limits. John Paul has always patiently helped me and gotten me back into usable states quickly and efficiently. Thank you for your help!

Useful **12** Funny **1** Cool **2**

Ryan E.
Wilmington, DE
81 friends
116 reviews
3 photos

8/8/2019

I bought a new iMac almost two years ago, but I was stupid enough not to spend the few extra bucks on the things that would've made the machine actually function the way I wanted it to, so after almost a year of screaming at a computer with a FACTORY INSTALLED 5400rpm HD and a whole 8 GB of RAM (though YES I ADMIT THIS WAS MY FAULT SHUT THE F UP), enough was enough.

Admittedly the biggest reason I dragged my feet on getting this mostly-except-not-really satisfactory machine upgraded was money, and time/convenience was a distant second. But I found the components I needed on Newegg--a SSD and a new pair of RAM modules that would kick me up to 16 GB. Both the drive and the memory were highly rated (Yelpers rejoice!)... but even after getting the components I needed, I dawdled on the upgrade. I can't exactly explain why... though maybe it had to do with realizing I'd spent nearly $300 on computer components that were sitting in a box in my closet.

I was a-feared' to cut open my iMac and try and make it better (bless its heart). Lucky for me (AND YOU!!!), though, there's a bonafide Apple GUY here in Wilmington that I am so happy to now know about.

First clue I knew I was going to get good service: Response to my email inquiry within hours--August 2019, for those who didn't bother to check the review date.

Second clue: The guy has been in the (admittedly somewhat decrepit) Trolley Square shopping center/thing/place for ages. Don't let it throw you. Longevity is a VERY good trait in a Mac person, coming from someone who dated a Mac tech and who still has dozens of Mac tech friends.

I have nothing more to say than WOW.

I am one TRILLION percent satisfied. I'm writing this review right now, BTW, on the very machine I brought in for the upgrade. The difference is like night and day. And while I know that The Mac Shop isn't "responsible" for the difference... they really kind of are.

Useful **10** Funny **1** Cool **2**

Nathan P.
Wilmington, DE
0 friends
3 reviews

1/15/2020

Great service. Great advice. Updated my MacBook software free of charge. Would recommend anyone goes here before suffering at the apple store.

Useful Funny Cool

Michael M.
Wilmington, DE
0 friends
23 reviews
3 photos

12/3/2019

I brought my "vintage " iMac in to get formatted so I could give it to my grandson. He scanned it for damage prior to formatting the hard drive. After that he even gave me more memory. After doing an awesome job I asked how much I owed him. He tells me "nothing". If I ever have an Apple problem, he's my man.

Useful Funny Cool

T S.
Philadelphia, PA
16 friends
18 reviews
6 photos

4/26/2018

I got to the store right around John Paul's lunch break, he was walking out but was nice enough to check my laptop anyway. It feels like the world stops when your Mac fails to work properly and he knew right away my two options for repair, which seemed basic to him. My only wish was to not have to buy a new one. Not only it was ready the next day, it ran faster and he managed to save my files! He is the best!

Useful **6** Funny **1** Cool **2**

Jordan B.
Wilmington, DE
182 friends
4 reviews

10/31/2017

Had the best experience here. Very professional and helpful in explaining what had happened to my computer. After 8 years my MacBook Pro crashed. I took it to apple who was gonna charge me with $2,500 for a possible fix. A friend recommended this shop and I spent under a hundred to get the problem fixed. Will definitely be coming back here.

Useful **9** Funny **1** Cool **2**

Emily B.
New York, NY
0 friends
7 reviews
2 photos

10/6/2017

The Mac Shop is the place for all your Apple needs! John Paul fixed my old computer up so that it works better than even when it was brand new. He was quick and professional and the place has a great feel to it. Definitely say YES to The Mac Shop. :)

Useful **7** Funny **1** Cool **2**

Ask the Community

Yelp users haven't asked any questions yet about **The Mac Shop**.

Ask a Question

Recommended Reviews

Search within reviews

Sort by **Yelp Sort**

Start your review of **The Mac Shop**.

D O.
Wilmington, DE
0 friends
12 reviews

3/31/2017

OMG! This business is amazing! I thought my 9 year old Macbook Pro was ready for retirement. I really did not want to spend another $1200 to replace it. MY old girl was too slow to run basic internet stuff and the beachball dance was all she had left. How sad! I read about doing some diy upgrades but I was not about to figure that out. Mac Store (JP) upgraded her memory and loaded EL Capitan on my old friend and now she is running like she is brand new!! $180 and I had it back the next day!!!!! What???? Amazing. This Small Business makes me want to support other small businesses. Wow

Useful **9** Funny **1** Cool **2**

Heather K.
Wilmington, DE
0 friends
2 reviews

12/15/2017

Highly recommend! My MacBook Air wouldn't charge and he took the time to troubleshoot the issue (staple stuck in the charging port) then run diagnostics on my laptop to ensure it was fully charging and functional. He would not accept any payment. I will definitely be back for him to do a tune-up.

Useful Funny Cool

Valarie W.
New Castle, DE
145 friends
35 reviews
10 photos

2/6/2014

A hidden gem! JP is knowledgeable, efficient, reasonable and just a nice guy! My MAC is now up and running like a NEW MAC with everything in place and ready to roll. He heard me talking about how my MAC goes everywhere with me, and suggested I might want to consider a solid state hard drive, along with an apology as he doesn't like to upsell. But he's right! My MAC goes to work, on the plane, at home, you name it. AND I have burned out 3 regular hard drives because I sometimes don't let it get fully into "snooze". I'm think I'm going to love the solid state hard drive.

Also, he does one on one's for $39.95. I think I am going to take him up on it in the future as I think I am underutilizing the power of my MAC.

THANK YOU!!!

Useful **12** Funny **1** Cool **2**

D Z.
Warminster, PA
0 friends
26 reviews
14 photos

6/11/2017

Great and friendly service. Needed to service an older macbook pro, the apple store turned me away, but the Mac Shop was up to the task. 24 hrs after I dropped the old mac off, I picked up a functioning mac. Thanks.

Useful 8 Funny 1 Cool 2

Roger T.
Manhattan, NY
0 friends
4 reviews
13 photos

2/16/2017

JP is a rare combination of generosity, honesty and knowledge. He helped me with an unusual problem and saved me a ton of money. I came in near tears because my computer fell in water (and no, Im NOT giving details of that), and I left thinking how lucky I was to have come to The Mac Shop first. He seems like a mad scientist the way he casually goes from machine to machine and easily comes up with answers and practical solutions. A rare gem. Don't hesitate to use this store!

Useful 9 Funny 3 Cool 2

Damian M.
Wilmington, DE
93 friends
7 reviews
3 photos

6/20/2014

John Paul is THE MAN when it comes to Mac. I am in a position to bring him many Macs for repair and let me tell you I have never been disappointed once. Always very friendly and courteous. I have seen him go above and beyond for his customers and he usually knows what's wrong in minutes of having it in his hands! Don't trust anyone else with your Mac!

Useful 11 Funny Cool 2

KP R.
Philadelphia, PA
24 friends
123 reviews
13 photos

3/13/2014

This place is everything the other reviews said it was. I was tired of going to the mall or making an appointments for days later with the "geniuses" at the Apple Stores. JP definitely knows about Apple products and will be very upfront and informative with you. I just did a simple RAM upgrade for my Macbook Pro but watching him work on 3-4 machines at one time was quiet impressive. He will give you the 1 on 1 time and answer any questions you could have. He also wears cool hats. ha. Will definitely come here anytime I have an issue

Useful 8 Funny Cool 3

Chris M.
Newark, DE
0 friends
17 reviews
1 photo

10/30/2015

My 2009 Mac harddrive died. Apple store no longer services this old model and recommended The Mac Shoppe. How fortunate i was. Whereas Apple said they would not convert it into a fusion drive, John Paul did without a problem. Now have my old Mac humming faster than ever. John Paul will have my repeat business.

Useful 8 Funny Cool 2

Zachary W.
Wilmington, DE
0 friends
1 review

3/30/2015

This was one of the best customer service experiences I've ever had. John Paul is extremely friendly and within minutes of me being there was able to diagnose and fix my problem without any BS or attempts to sell me on anything that wasn't needed. I will definitely be back if I have any more issues with our macs.

Useful 1 Funny Cool

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5
23.8 miles

Get your device diagnosed for free at uBreakiFix Glassb us a call on... read more

Ben d.
Rockland, DE
18 friends
4 reviews
7 photos

9/8/2012
First to Review

This shop is an oasis in the wilderness of expensive computer repair. To say they just fix Mac's is an understatement - they fix them quickly, at a very low cost - in the process one gets an education in all things Mac. This shop is to Mac repair, what Steve Jobs is to Mac design. I highly recommend these guys.

Useful **9** | Funny | Cool **2**

Dustin S.
Starmount, Charlotte, NC
0 friends
1 review

2/27/2014
What great Mac repair shop. My hard drive went on a 6 year old mac book, JP replaced it with a 500GB HD and transferred my data from a external HD. I now basically have a new computer that runs fanatically for a fraction of the price. Excellent shop. All this was same day service.

Useful **8** | Funny | Cool **2**

1 2 **3**
3 of 3

45 other reviews that are not currently recommended

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People Also Viewed

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Staples
10
Shipping Centers, Printing Services, Mobile Phone Repair

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT L

From: [redacted]
Subject: D sappo nt ng
Date: October 22, 2020 at 3:50 PM
To: John Pau Mac Isaac mac saac@demacshop.com

SS

I was a loyal customer who will never come back. How could you do this?

Suzanne

[redacted]

Subject: Eat sh t and d e SLOWLY fuck ng Russ an stooge
Date: October 15, 2020 at 2:41 PM
To: nfo@demacshop.com

DK

From: [redacted]
Subject: Fear & Bu
Date: October 15, 2020 at 2:14 AM
To: nfo@demacshop.com

T

You can stop with all the melodrama. No one's going to murder you...mainly because you don't know anything. You have no copy of anyone's hard drive, and if you do, you're going to jail for theft of private property. Didn't your "lifesaver" Rudy clue you into that? No? Bummer. Did he tell you that your business is done for? No? Bummer again. Got any employee's? Yeah...THEIR lives are now ruined as well. Yet another narrow-minded, low info, low IQ idiot who believes EVERYTHING THEY READ on Facebook & worships the Que-A-Moron slide towards complete & total ignorance & stupidity. No common sense..and no critical thinking skills. Just one more garden-variety Trump-Stooge who just threw away their normal lives for a chance to lick Fat Donnie's scrotum and bask in the orange glow of a maniac.

Wouldn't it have been easier to just shoot-up a pizza joint?

Good-luck with all that, Dipshit.

From: [redacted]
Subject: Foo sh
Date: October 25, 2020 at 2:31 PM
To: nfo@demacshop.com

If I ever got hard dr ves n damaged aptops that were p cked up at my shop.... I wou dnt go mak ng cop es of the r hard dr ves and then d g nto them w th b atant d sregard for customer pr vacy. You ve c ear y been p ayed and used by the FSB as an easy mark. You re so far up your own ass you probab y cant see t. You just stumb ed across a th s mater a what a joke. Anyone w th ha f a bra n can see th s for what t s. I dont ke B den, but good God how can you support a fuck ng psycho n office who es ke ts breath ng. Fuck ng nsaaannnneeeeeee

From: John Paul Mac Isaac
To: Brian Della Rocca
Subject: Fwd: Better get out of town asshole
Date: Thursday, December 17, 2020 10:01:27 AM

Sent from my iPhone

Begin forwarded message:

From: John Paul Mac Isaac [redacted]
Date: December 7, 2020 at 3:50:13 PM MST
To: [redacted]cj.state.de.us
Subject: Fwd: Better get out of town asshole

Begin forwarded message:

From: Anonymousemail <noreply@anonymousemail.me>
Subject: Better get out of town asshole
Date: November 24, 2020 at 6:39:08 PM MST
To: info@demacshop.com

This email was sent via **anonymousemail**
To remove this signature and unlock all features go premium
→ New! Join our affiliate program and start **earning money**.

Soon they will be playing the bagpipes for you asshole soon Like trump

Keep moving and looking over your shoulder buttfuck

From: [redacted]
Subject: Hard Dr ve
Date: October 25, 2020 at 1:27 AM
To: nfo@demacshop.com

So, how many customers do you think will now do business with a company that copied a customers hard drive and sold the contents to the highest bidder.
Talk about un-ethical. You're a real spice of shit.

Shirley [redacted]

From: [redacted]
Subject: Haven't A ways been a moron
Date: October 15, 2020 at 8:31 AM
To: nfo@demacshop.com

MD

John Pau ,
What happened to you, you used to have some semb ance of nte gence. You have gone down a rabb t ho e that s go ng to destroy your bus ness, reputat on and fe. A n the name of a rac st, Misogynist, moronic asshat.
Mike [redacted]

Sent from my Phone

From: [redacted]
Subject: L0W LIFE
Date: October 15, 2020 at 12:18 PM
To: nfo@demacshop.com

RH

That is about as low as you can go.
I will spend my next few years thinking how AWFUL John Paul Mac Isaac is!

what a low life.

I hope you lose your business. You are unethical.

Disgusted.
Rupert [redacted]

From: [redacted]
Subject: Mac Shop
Date: October 21, 2020 at 5:42 PM
To: nfo@demacshop.com

Just ost my bus ness, and I w be sure to spread the word on soc a med a about your mpropr ety. You shou d be ashamed of yourse f.

Sent w th ProtonMa Secure Ema .

From: [redacted]
Subject: Repa r
Date: October 21, 2020 at 2:59 PM
To: nfo@demacshop.com

RI

How does a b nd p ece of sh t boot cker repa r computers?

From: [redacted]
Subject: STOLEN LAPTOPS
Date: October 15, 2020 at 5:40 PM
To: nfo@demacshop.com

CP

It's obv ous you cannot be trusted w th the contents of your customer's aptops. You can be sure that a of the B den's supporters, fam y and fr ends, wh ch s a most everyone n De aware w no onger be do ng bus ness w th you.

I mag ne you' be bankrupt and out of bus ness short y. Good r ddance.

From: [redacted]
Subject: unconsc onab e
Date: October 15, 2020 at 8:09 AM
To: nfo@demacshop.com

BS

W never go to your shop aga n.

From: [redacted]
Subject: URGENT: E ect on Interference
Date: October 15, 2020 at 5:44 AM
To: nfo@demacshop.com

JC

Teamed-up w th G u an and Russ a to nterfere n the most consequent a e ect on of our t me, eh?

You are a scumbag and tra tor

A you' now know s a rea ty co oured by that truth. The same w sure y be made true of your fam y. Noth ng w be the same aga n

Act ons have consequences, as you're about to earn

I wou d not be you r ght now for a m on bucks

- Fate

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JOHN PAUL MAC ISAAC,	)
	)
Plaintiff,	)
	)
v.	)
	)
CABLE NEWS NETWORK, INC., ADAM BENNETT SCHIFF, POLITICO LLC, ROBERT HUNTER BIDEN, AND BFPCC, INC.,	)
	)
Defendants.	)

CERTIFICATION OF THE DIRECTOR OF THE TORTS BRANCH, CIVIL DIVISION, UNITED STATES DEPARTMENT OF JUSTICE

I, James G. Touhey, Jr., am the Director of the Torts Branch, Civil Division, United States Department of Justice, responsible for most civil litigation under the Federal Tort Claims Act. I have read the amended complaint dated January 20, 2023, in the above-captioned case. Pursuant to 28 U.S.C. § 2679, and by virtue of the authority vested in me pursuant to 28 C.F.R. § 15.4, I hereby certify, on the basis of the information now available with respect to the incidents alleged in the complaint, that defendant Adam Schiff was acting within the scope of his employment as a Member of Congress at the time of the alleged conduct.

Dated: March 7, 2023

JAMES G. TOUHEY, JR.
Director, Torts Branch
Civil Division, United States Department of Justice

EFiled: Nov 18 2022 03:29PM EST
Transaction ID 68406840
Case No. S22C-10-012 CAK

IN THE SUPERIOR COURT FOR THE STATE OF DELAWARE

JOHN PAUL MAC ISAAC	)	
	)	
Plaintiff,	)	
	)	
v.	)	**Case No. S22C-10-012 CAK**
	)	
CABLE NEWS NETWORK, INC.,	)	
ADAM BENNETT SCHIFF,	)	
POLITICO LLC, AND	)	
ROBERT HUNTER BIDEN,	)	
	)	
Defendants.	)	

SUMMONS

STATE OF DELAWARE
TO THE POLIQUIN FIRM;
YOU ARE COMMANDED:

To summon the above-named Defendants so that within 20 days after service hereof upon the Defendants, exclusive of the date of service, the Defendants shall serve upon Ronald G. Poliquin, Esquire, Plaintiff's attorney, whose address is 1475 S. Governors Ave., Dover, Delaware 19904, an Answer to the Complaint.

To serve upon the Defendants a copy hereof of the Complaint (and of the Affidavit of Demand if any has been filed by the Plaintiff).

DATED:

NOV 2 8 2022

MYRTLE A. THOMAS
PROTHONOTARY

Per Deputy

TO THE ABOVE-NAMED DEFENDANTS:

In case of your failure, within 20 days after service hereof upon you, exclusive of the day of service, to serve on Plaintiff's attorney named above an Answer to the Complaint, judgment by default will be rendered against you for the relief demanded in the Complaint.

DATED:

NOV 2 8 2022

MYRTLE A. THOMAS
PROTHONOTARY

Per Deputy

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

JOHN PAUL MAC ISAAC	)	
	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	**Case No.**
	)	
CABLE NEWS NETWORK, INC.,	)	
ADAM BENNETT SCHIFF,	)	
POLITICO LLC, AND	)	
ROBERT HUNTER BIDEN,	)	
	)	
Defendants.	)	

PRAECIPE

TO: COLLEEN REDMOND, PROTHONOTARY
NEW CASTLE COUNTY COURTHOUSE
414 FEDERAL STREET
DOVER, DE 19901

Please docket the attached Complaint and related pleadings and issue a Summons to the Sheriff of New Castle County directing him to serve the Complaint and related pleadings so that service may be affected upon the above-named Defendants, Cable News Network, INC. by their registered agent, The Corporation Trust Company, 1209 Orange St. Wilmington DE, 19801 and Defendant Adam Bennett Schiff, with the last known address of 8204 Windsor View Terrace, Potomac, Maryland 20854, and Politico LLC by its Registered Agent, Corporation Service Company, 251 Little Falls

Drive, Wilmington DE, 19808 and Robert Hunter Biden, whose service address will be established in the future, by forwarding a copy to the Sheriff of New Castle County for service at the above address.

THE POLIQUIN FIRM LLC

/s/ Ronald G. Poliquin, Esquire
Ronald G Poliquin, Esquire
DE I.D. No.: 4447
1475 S. Governors Avenue
Dover, DE 19904
Attorney for Plaintiff John Isaac

DATED: October 17, 2022

SUPERIOR COURT
CIVIL CASE INFORMATION STATEMENT (CIS)

Filed Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

COUNTY: NC

CIVIL ACTION NUMBER:

Caption: John Paul Mac Isaac, Plaintiff, v. Cable News Network, INC., Adam Bennett Schiff, Politico LLC. and Robert Hunter Biden Defendant.	Civil Case Code: CMIS Civil Case Type: CIVIL MISCELLANEOUS MANDATORY NON-BINDING ARBITRATION (MNA) _____ Name and Status of Party filing document: Ronald G. Poliquin (#4447) Document Type: (E.G.; COMPLAINT; ANSWER WITH COUNTERCLAIM) *Complaint* JURY DEMAND: YES
ATTORNEY NAME(S): RONALD G. POLIQUIN ATTORNEY ID(S): 4447 FIRM NAME: THE POLIQUIN FIRM LLC ADDRESS: 1475 S. GOVERNORS AVE. DOVER, DE 19904 TELEPHONE NUMBER: 302-702-5501 FAX NUMBER: 302-213-0042 E-MAIL ADDRESS: RON@POLIQUINFIRM.COM	IDENTIFY ANY RELATED CASES NOW PENDING IN THE SUPERIOR COURT OR ANY RELATED CASES THAT HAVE BEEN CLOSED IN THIS COURT WITHIN THE LAST TWO YEARS BY CAPTION AND CIVIL ACTION NUMBER INCLUDING JUDGE'S INITIALS: N/A EXPLAIN THE RELATIONSHIP(S): N/A OTHER UNUSUAL ISSUES THAT AFFECT CASE MANAGEMENT: N/A (IF ADDITIONAL SPACE IS NEEDED, PLEASE ATTACH PAGE)

THE PROTHONOTARY WILL NOT PROCESS THE COMPLAINT, ANSWER, OR FIRST RESPONSIVE PLEADING IN THIS MATTER FOR SERVICE UNTIL THE CASE INFORMATION STATEMENT (CIS) IS FILED. THE FAILURE TO FILE THE CIS AND HAVE THE PLEADING PROCESSED FOR SERVICE MAY RESULT IN THE DISMISSAL OF THE COMPLAINT OR MAY RESULT IN THE ANSWER OR FIRST RESPONSIVE PLEADING BEING STRICKEN.

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

JOHN PAUL MAC ISAAC Plaintiff, v. CABLE NEWS NETWORK, INC., ADAM BENNETT SCHIFF, POLITICO LLC. AND ROBERT HUNTER BIDEN Defendants.	)	Case No.

COMPLAINT

COMES NOW, PLAINTIFF John Paul Mac Isaac (hereinafter, "Plaintiff"), by and through undersigned counsel hereby sues Defendants and alleges as follows:

A. PARTIES, JURISDICTION & VENUE

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

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

3. Defendant Cable News Network, Inc. ("CNN") is a Delaware corporation that provides televised and internet-based news and commentary to

cable television subscribers and the general public. Its registered agent is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801

4. Defendant Adam Bennett Schiff ("SCHIFF"), being sued in his individual capacity, is an individual over the age of 18 who is *sui juris* and resides California and Maryland. SCHIFF is the United States Representative for the 28th District of California and was, at the time of the actions giving rise to this Complaint, the Chairman of the House of Representatives Permanent Select Committee on Intelligence. Schiff can be served at [redacted]

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

6. Defendant BFPCC, Inc. ("BFPCC") is a Delaware corporation that was used for the 2020 Presidential campaign of President Joseph R. Biden.

7. Defendant Robert Hunter Biden ("HUNTER") is currently a California resident who transacts significant business in State of Delaware and has significant ties to the State of Delaware.

8. Personal jurisdiction over Defendants is proper pursuant Del. Const. Art. IV, § 7.

9. Specific personal jurisdiction over SCHIFF is proper pursuant to 10 Del. C. §3104(c)(3).

10. Venue is appropriate in this Court as Plaintiff resides in New Castle County.

B. FACTS APPLICABLE TO ALL COUNTS

11. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 11.

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

13. Plaintiff owned a small business named The Mac Shop, Inc. (the "Mac Shop") which was a Delaware corporation.

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

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

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

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

18. On or about April 12, 2019, HUNTER was referred to Plaintiff's shop to fix some damaged Macs.

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

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

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

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

Date	Customer	ID	Title	Status	Amount
04/17/20	Hunter Biden	6077	The Mac Shop Inv...	Overdue	$85.00

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

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

25. Pursuant to the terms of the Repair Authorization signed by HUNTER, "[e]quipment left with the Mac Shop after 90 days of notification of

completed service will be treated as abandoned and you agree to hold the Mac Shop harmless for any damage or loss of property."

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

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

28. In August 2020, Plaintiff connected with COSTELLO to whom he provided a copy of the recovered data and the Repair Authorization.

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

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

31. On October 13, 2020, Plaintiff received a call from Mr. George Mesires,[1] identifying himself as HUNTER's attorney, asking if Plaintiff still had possession of his client's laptop and following up thereafter with an email to the Plaintiff. Copy of email attached as **EXHIBIT C**.

32. On October 14, 2020, at approximately 5:00 AM, the NY POST published an exposé about the contents of HUNTER's recovered data.

33. Shortly thereafter, the NY POST "updated" the online version of the exposé.

34. As a direct result of the NY POST exposé, public emotions were heightened and many in the general public, the media, and the government began to either defend or attempt to refute the exposé. The NY POST exposé fueled a rise in anger and hatred between the different political movements.

35. As a result of the publication of the exposé, the Plaintiff quickly became the target of accusations by those who sought to cast doubt on the information contained in the laptop and the laptop itself.

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

[1] George Mesires is a partner in the Chicago office of Faegre Drinker Biddle & Reath LLP.

37. While Plaintiff verified how he came into possession of the recovered data to the NY POST, Plaintiff was unaware of the details of the NY POST exposé, when the NY POST exposé was going to be published, and Plaintiff explicitly told the NY POST that he did not want to be identified.

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

39. Plaintiff was not explicitly identified in the NY POST exposé but was, instead, referred to as the Delaware computer repair shop "store's owner."

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

41. Also on October 14, 2020, *subsequent* to the NY POST's disclosure of the Plaintiff's identity, other media outlets, including writers from the Daily Beast purportedly investigating the NY POST exposé, interviewed and wrote an article about the Plaintiff portraying him as bizarre

(https://www.thedailybeast.com/man-who-reportedly-gave-hunters-laptop-to-rudy-speaks-out-in-bizarre-interview).[2]

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

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

44. Upon information and belief, the Public Statement was issued to influence American voters to vote for then-candidate, now President, Joseph R.

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

Biden and offered no actual evidence of the claims that Russia was involved in the release of the information from Hunter Biden's laptop.

45. On October 19, 2020, Director of National Intelligence Ratcliffe, stated:

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

46. In a letter dated, October 20, 2020, Ms. Jill C. Tyson, Assistant Director of the FBI's Office of Congressional Affairs reported to Congress that the FBI has, "nothing to add at this time to the October 19th public statement by the Director of National Intelligence about the available actionable intelligence." Copy of letter attached as **EXHIBIT G**.

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

48. On or about October 30, 2020, Plaintiff's clarifying statement was published by justthenews.com for all to read.[3]

49. On October 21, 2021, POLITICO published a story confirming the validity of the NY POST exposé. *See*

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

https://www.politico.com/news/magazine/2021/10/12/hunter-biden-corruption-515583.

50. On March 16, 2022, the NY Times published an article further verifying the validity of the NY POST exposé stating:

> People familiar with the investigation said prosecutors had examined emails between Mr. Biden, Mr. Archer and others about Burisma and other foreign business activity. Those emails were obtained by The New York Times from a cache of files that appears to have come from a laptop abandoned by Mr. Biden in a Delaware repair shop. The email and others in the cache were authenticated by people familiar with them and with the investigation.

See https://www.nytimes.com/2022/03/16/us/politics/hunter-biden-tax-bill-investigation.html.

51. On March 30, 2022, the Washington Post confirmed the validity of the NY POST exposé. *See* https://www.washingtonpost.com/technology/2022/03/30/hunter-biden-laptop-data-examined/.

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

52. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

53. SCHIFF, individually, was actively involved in fundraising for the 2020 Presidential campaign of Joseph R. Biden, Jr. Articles outlining Defendant's fundraising efforts attached as **EXHIBIT H**.

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

55. According to a poll conducted by the Media Research Center, nearly 9.4% of Biden voters would not have voted for him had they known about the full extent of the scandal.[4]

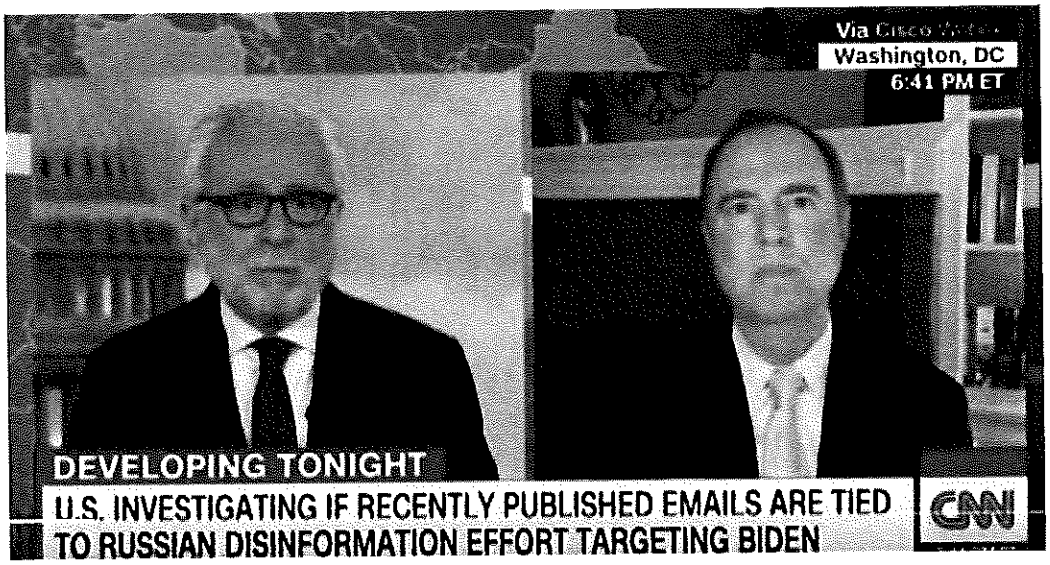
Even more Biden voters (45.1%) said they were unaware of the financial scandal enveloping Biden and his son, Hunter (a story infamously censored by **Twitter** and **Facebook**, as well as **ignored by the liberal media**). According to our poll, full awareness of the Hunter Biden scandal would have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

56. Upon information and belief, SCHIFF knowingly fomented further anger and hatred against the Plaintiff and others in his defense of Presidential-candidate, Joseph R. Biden, Jr., and his attempt to "kill" the story.

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

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

58. The Interview was conducted live "via Cisco Webex" with BLITZER in New York and SCHIFF at home.



59. BLITZER's first question to SCHIFF was:

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

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

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

61. SCHIFF continued with:

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

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

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

63. SCHIFF responded as follows:

> "Well, I was in the Intelligence Committee today to see what the latest was, and frankly, ***we haven't gotten much from the intelligence community very recently***, which concerns me. They have at times, some of the leadership, like Director [of National Intelligence] Ratcliffe, not been very forthcoming in terms of the intelligence on the Russian threat and been promoting this false equivalence with other countries.
>
> So, you know, I wish I could tell you more, Wolf. I wish the intelligence community was able to tell the public more.
>
> ***But we do know this: the Russians are once again actively involved in trying to denigrate the Vice President***..." ***Emphasis*** added.

64. Director of National Intelligence Ratcliffe's repudiation of that claim on October 19, 2020 was during an interview on *Fox News Mornings with Maria*.

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

66. SCHIFF confirmed this in his interview with BLITZER.

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

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

69. SCHIFF had not received reports that the Hunter Biden laptop information was part of a Russian disinformation campaign, therefore, SCHIFF knowingly and intentionally made the false statements that the information contained in the NY POST exposé, originally obtained from the Plaintiff, was part of a Russian plot to influence the U.S. Presidential election.

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

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

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

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

74. Upon information and belief, SCHIFF's false statements were made from his home *after* normal working hours.

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

76. SCHIFF's false statements were, in fact, campaign speech and not speech associated with his Congressional duties which, of course, do not include lying to the American public about the Plaintiff.

77. Plaintiff, a target of SCHIFF's defamatory campaign speech, was not a participant in any political campaign.

78. SCHIFF knowingly conveyed false information with the intent to harm the reputation of Plaintiff.

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

80. Upon information and belief, SCHIFF knowingly conveyed false information to the public with the intent to manipulate the public in the United States to elect Joseph R. Biden, Jr. as the next President.

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

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

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

84. The tortious injury to Plaintiff in Delaware by SCHIFF's false and defamatory statements could reasonably have been foreseen.

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

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

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

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

89. SCHIFF's false and defamatory campaign statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a Russian attempt to undermine American democracy and the 2020 Presidential election.

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

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

92. SCHIFF acted with actual malice toward the Plaintiff in that he acted with knowledge that his statements were false.

93. Alternatively, SCHIFF acted with actual malice toward the Plaintiff in that he acted with reckless disregard to the harm his knowingly defamatory false campaign statements would have on the Plaintiff, both personally and as a small business owner.

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

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

96. SCHIFF knew or should have known that his false and defamatory statements would be broadcast to an audience in Delaware.

97. SCHIFF knew or should have known that his false and defamatory statements would be viewed via the Internet by Delaware residents.

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income resulting from SCHIFF's false and defamatory statements;

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

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

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

(e) Requiring SCHIFF to make a public apology to Plaintiff; and

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

D. COUNT 2: DEFAMATION AND DEFAMATION PER SE CNN

99. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 99.

100. Upon information and belief, CNN supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections or, alternatively, opposed the candidacy of Donald J. Trump.

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

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

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

104. CNN knew Plaintiff was the source of the information as it had published an article referencing an interview with Plaintiff on October 14, 2020.[5] In that article, it said:

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

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

106. CNN also falsely reported that, based on the October 20, 2020 letter to Congress from Ms. Jill C. Tyson, there was a "suggestion" that the review was continuing.[6]

107. There was no such suggestion in the letter to Congress.

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[5] https://lite.cnn.com/en/article/h_7e5fcdffc7051ba1d73b135ee16f5b3b

[6] https://www.cnn.com/2020/10/21/politics/fbi-russia-disinformation/index.html

108. CNN's false report that the letter from Ms. Jill C. Tyson suggested that the review was continuing created a strong implication that U.S. intelligence officials actually believed Russia was involved in the release of information from Hunter Biden's laptop.

109. CNN boasts a viewership of over 700,000 viewers each week.[7]

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

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

110. CNN broadcast and published its statements that the Hunter Biden laptop is part of a Russian disinformation scheme and that the U.S. intelligence agencies are continuing to investigate Russia's participation without privilege to do so to its over 700,000 viewers.

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

112. At the time CNN broadcast the defamatory false statements, CNN knew the backstory of the Hunter Biden laptop, having spoken with Plaintiff and written about the Plaintiff on October 14, 2020.

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[7] https://www.adweek.com/tvnewser/week-of-march-28-basic-cable-ranker-fox-news-improves-to-no-1-in-total-primetime-viewers/504622/

113. CNN acted with actual malice toward the Plaintiff by knowingly and intentionally broadcasting and publishing false and defamatory statements about the Hunter Biden laptop being tied to a Russian disinformation campaign in an attempt to harm Plaintiff's reputation.

114. Alternatively, CNN acted with actual malice toward the Plaintiff by knowingly broadcasting and publishing the false and defamatory statements about Plaintiff with reckless disregard for the harm the false statements would cause to the Plaintiff.

115. CNN knowingly broadcast and published the falsehoods to third parties – its over 700,000 viewers and its readership.

116. CNN knew or should have known such false and defamatory statements would likely result in material and substantial injury to Plaintiff, as the statements accused the Plaintiff of knowingly participating in a Russian scheme to disrupt the 2020 presidential elections in the United States of America.

117. CNN's broadcast and publication of the false and defamatory statements have subjected and continue to subject the Plaintiff to distrust, scorn, ridicule, hatred, and contempt.

118. CNN's broadcast and publication of the false and defamatory statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a

Russian attempt to undermine American democracy and the 2020 Presidential election.

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

120. Upon information and belief, CNN executives specifically told its journalists and television personalities to refer to the NY POST expose as having been resolved in the previously reported impeachment of President Donald Trump.[8]

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

122. It is clear by its broadcasts and publications, CNN intended to harm the Plaintiff and any other party associated with the release of information from the laptop by broadcasting and publishing the false and defamatory statements about the Plaintiff.

123. CNN acted with actual malice toward the Plaintiff in that it acted with knowledge that the statements were false or, at the very least, acted with reckless

[8] https://nypost.com/2020/12/02/cnn-caught-burying-the-posts-hunter-biden-expose-devine/

disregard to the harm the knowingly defamatory false statements would have on the Plaintiff, both personally and as a small business owner.

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income resulting from CNN's false and defamatory broadcast and publication;

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

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

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

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

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

E. COUNT 4: DEFAMATION AND DEFAMATION PER SE POLITICO

126. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

127. Upon information and belief, POLITICO supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections or, alternatively, opposed the candidacy of Donald J. Trump.

128. On October 19, 2020, POLITICO published an article entitled:[9]

NATIONAL SECURITY

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

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

129. The October 19, 2020 article relied on the "Public Statement on the Hunter Biden Emails," signed by more than 50 former intelligence officials (**EXHIBIT F**) for its reporting.

130. The headline to the October 19, 2020 article says that the Hunter Biden story ***IS*** Russian disinformation, according to dozens of former intel officials.

[9] https://www.politico.com/news/2020/10/19/hunter-biden-story-russian-disinfo-430276

131. POLITICO specifically referenced Plaintiff in its article:

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

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

133. POLITICO knowingly falsely stated as fact in the title of its article that the Hunter Biden story ***IS*** Russian disinformation.

134. The article was written by journalist Natasha Bertrand, who seemingly has a history of transforming speculation into fact in the stories upon which she reports.[10]

135. POLITICO knowingly published the article with a false headline stated as fact about Plaintiff and others involved in releasing the information about the laptop.

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

137. The false and defamatory publication about the Plaintiff by POLITICO include, but are not limited to, allegations that the information

[10] https://www.washingtonpost.com/opinions/2020/02/28/how-politicos-natasha-bertrand-bootstrapped-dossier-credulity-into-tv-gig/

published by the NY POST, which POLITICO clearly identifies the information as coming from Plaintiff, was part of a Russian disinformation campaign, thereby directly implying that the Plaintiff part of a Russian disinformation campaign and/or, more specifically, a Russian agent.

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

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

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

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

142. POLITICO knowingly published the falsehoods as facts to third parties – its readers.

143. POLITICO knew or should have known such false statements in the publication would likely result in material and substantial injury to Plaintiff, as the statements call into question Plaintiff's loyalty to the United States.

144. POLITICO knew or should have known such false statements in the publication would likely result in subjecting Plaintiff to distrust, scorn, ridicule, hatred, and contempt, which continues to this day.

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

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

147. Upon information and belief, and based on the prejudicial October 19th article, POLITICO intended to harm the Plaintiff (among others) through the publication of the false statements.

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of POLITICO's wrongdoing;

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

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

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

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

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

F. COUNT 5: DEFAMATION AND DEFAMATION PER SE BFPCC, INC.

150. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

151. BFPCC, which is an acronym for "Biden for President Campaign Committee," is a Delaware corporation formed to operate as the Presidential campaign for President Joseph R. Biden, Jr.

152. As such, BFPCC supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections.

153. On or about October 14, 2020, as quoted in a POLITICO article, Biden campaign officials stated that the NY POST exposé "is a Russian disinformation operation." *See* https://www.politico.com/news/2020/10/14/biden-campaign-lashes-out-new-york-post-429486.

154. Senior Biden Campaign Advisor, Symone D. Sanders, on behalf of BFPCC, stated in an interview on MSNBC that, "[i]f the president [Trump] decides to amplify these latest smears against the vice president and his only living son, that is Russian disinformation." *See* https://greenwald.substack.com/p/biden-the-media-and-cia-labeled-the.

155. Biden Deputy Campaign Manager Kate Bedingfield, on behalf of BFPCC, said of the information from the laptop, "I think we need to be very, very clear that what [Trump is] doing here is amplifying Russian misinformation." *See* Id.

156. The Candidate himself, Joseph R. Biden, Jr., representing the views of BFPCC, said, "[t]here are 50 former national intelligence folks who said that what

he's accusing me of is a Russian plant. Five former heads of the CIA, both parties, say what he's saying is a bunch of garbage. Nobody believes it except his good friend Rudy Giuliani." *See* https://www.nationalreview.com/corner/sure-seems-joe-biden-knowingly-lied-about-the-hunter-biden-laptop-story/.

157. Joseph R. Biden, Jr. also said, "[t]he intelligence community warned the president that Giuliani was being fed disinformation from the Russians. We also know Putin is trying to spread disinformation about Joe Biden. When you put the combination of Russia, Giuliani, and the president together ... it is what it is. A smear campaign." *See* https://krcrtv.com/joe-biden-calls-hunter-email-story-a-smear-stays-quiet-about-2017-business-meeting.

158. The members/employees of BFPCC knew or should have known that the claims that the Hunter Biden Laptop story is Russian disinformation were false.

159. Despite such knowledge, BFPCC knowingly published and broadcast the falsehoods as facts to third parties – the supporters of candidate Joseph R. Biden, Jr.

160. BFPCC knew or should have known such false statements would likely result in material and substantial injury to Plaintiff, as the statements call into question Plaintiff's loyalty to the United States.

161. BFPCC knew or should have known such false statements would likely result in subjecting Plaintiff to distrust, scorn, ridicule, hatred, and contempt, which continues to this day.

162. BFPCC's false statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a Russian attempt to undermine American democracy and the 2020 Presidential election.

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

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of BFPCC's wrongdoing;

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

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

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

(e) Requiring BFPCC issue a public apology to Plaintiff; and

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

G. COUNT 5: DEFAMATION AND DEFAMATION PER SE ROBERT HUNTER BIDEN

166. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 52.

167. HUNTER is the son of President Joseph R. Biden, Jr.

168. HUNTER supported the candidacy of Joseph R. Biden, Jr. for president in the 2020 presidential elections.

169. HUNTER knowingly left his laptop with Plaintiff on April 12, 2019.

170. Soon thereafter HUNTER returned to Plaintiff's shop to leave an external hard drive to which Plaintiff could transfer the data from HUNTER's laptop.

171. HUNTER never returned to Plaintiff's shop pick up his laptop.

172. When asked about the laptop in a television interview broadcast around the world, HUNTER stated, "There could be a laptop out there that was stolen from me. It could be that I was hacked. It could be that it was the – that it was Russian intelligence. It could be that it was stolen from me. Or that there was a laptop stolen from me." *See* https://edition.cnn.com/2021/04/02/politics/hunter-biden-laptop/index.html.

173. HUNTER knew it was his laptop.

174. HUNTER's attorney, George Mesires contacted Plaintiff on October 13, 2020 about the laptop.

From: "Mesires, George R." [redacted]
Date: October 13, 2020 at 6:58:59 PM EDT
To: "macisaac@demacshop.com" [redacted]
Subject: George Mesires contact information

John Paul:

Thank you for speaking with me tonight. As I indicated, I am a lawyer for Hunter Biden and I appreciate you reviewing your records on this matter. Thank you.

George

George R. Mesires
Partner
[redacted]
Connect: vCard

[redacted] direct

Faegre Drinker Biddle & Reath LLP
311 S. Wacker Drive, Suite 4300
Chicago, Illinois 60606, USA

175. HUNTER knowingly broadcast the false and defamatory information about his laptop to third parties – viewers of the interview.

176. HUNTER's knowing broadcast of the false and defamatory information about his laptop imputed that Plaintiff was involved in one or more crimes including, theft of his laptop, hacking of his laptop, or being part of a plot by Russian intelligence.

177. HUNTER knew or should have known such false statements would likely result in material and substantial injury to Plaintiff, as the statements impute that Plaintiff has committed one or more crimes.

178. HUNTER knew or should have known such false statements in the publication would likely result in subjecting Plaintiff to distrust, scorn, ridicule, hatred, and contempt, which continues to this day.

179. HUNTER's false statements impute that Plaintiff has committed an infamous crime, i.e., treason and/or other crimes against the United States of America by participating in a Russian attempt to undermine American democracy and the 2020 Presidential election.

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

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

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

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of HUNTER's wrongdoing;

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

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

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

(e) Requiring HUNTER issue a public apology to Plaintiff; and

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

H. COUNT 6: CIVIL CONSPIRACY TO COMMIT DEFAMATION ALL DEFENDANTS

183. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 183.

184. All Defendants expressed support for then-Presidential candidate, Joseph R. Biden, in the 2020 U.S. Presidential election and/or opposed incumbent candidate, Donald J. Trump.

185. The information contained in the NY POST exposé hurt the candidacy of Joseph R. Biden, Jr. and polls show that it could have resulted in the loss of the presidential election.

186. All Defendants knew that the information contained in the NY POST exposé would hurt the candidacy of Joseph R. Biden and, potentially, prevent his election.

187. Voters who voted for Joseph R. Biden have indicated that, if they had known more about the Hunter Biden laptop, they likely would not have voted for Joseph R. Biden.

188. All Defendants acted in concert to prevent the re-election of President Donald J. Trump, which included defaming the Plaintiff.

189. All Defendants openly participated in the efforts to "kill" the Hunter Biden laptop story by making accusations that Plaintiff was a willing participant in a Russian plot to spread disinformation to impact the U.S. presidential election.

190. All Defendants openly participated in the efforts to falsely communicate to the general public that the Hunter Biden laptop story ***is*** Russian disinformation and that Plaintiff is working with the Russians to influence the U.S. Presidential elections.

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

192. Each Defendant provided substantial assistance to the other Defendants by repeating the defamatory statements to bolster the false claims.

193. Each Defendant assisted the other Defendants to accomplish a lawful purpose (the election of Joseph R. Biden, Jr.) through unlawful means (defamation).

194. The defamatory statements made about the Plaintiff by the Defendants in furtherance of a conspiracy to cast doubt on the validity of the information contained on the Hunter Biden Laptop resulted in significant damage to the Plaintiff's reputation and his business which closed soon after the defamatory statements were broadcast and published.

195. As a result a result of the reputational damage to Plaintiff and the closing of his business, Plaintiff has suffered loss of his business and income.

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of Defendants' wrongdoing;

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

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

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

(e) Requiring all Defendants to issue public apologies to Plaintiff; and

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

I. COUNT 8: AIDING AND ABETTING ALL DEFENDANTS

196. Plaintiff incorporates by reference all allegations contained in Paragraphs 1 – 183.

197. All Defendants expressed support for then-Presidential candidate, Joseph R. Biden, in the 2020 U.S. Presidential election and/or opposed incumbent candidate, Donald J. Trump.

198. The information contained in the NY POST exposé hurt the candidacy of Joseph R. Biden, Jr. and polls show that it could have resulted in the loss of the presidential election.

199. All Defendants knew that the information contained in the NY POST exposé would hurt the candidacy of Joseph R. Biden and, potentially, prevent his election.

200. Voters who voted for Joseph R. Biden have indicated that, if they had known more about the Hunter Biden laptop, they likely would not have voted for Joseph R. Biden.

201. Each Defendant knowingly provided assistance to the other Defendants by falsely spreading the defamatory information to prevent the re-election of President Donald J. Trump.

202. All Defendants knowingly participated in the efforts to "kill" the Hunter Biden laptop story by making accusations that Plaintiff was a willing participant in a Russian plot to spread disinformation to impact the U.S. presidential election.

203. All Defendants knowingly participated in the efforts to falsely communicate to the general public that the Hunter Biden laptop story ***is*** Russian disinformation and that Plaintiff is working with the Russians to influence the U.S. Presidential elections.

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

205. Each Defendant provided substantial assistance to the other Defendants by repeating the defamatory statements to bolster the false and defamatory claims.

206. Each Defendant assisted the other Defendants to accomplish a lawful purpose (the election of Joseph R. Biden, Jr.) through unlawful means (defamation).

207. The defamatory statements made about the Plaintiff by the Defendants in furtherance of a conspiracy to cast doubt on the validity of the information contained on the Hunter Biden Laptop resulted in significant damage to the Plaintiff's reputation and his business which closed soon after the defamatory statements were broadcast and published.

208. As a result a result of the reputational damage to Plaintiff and the closing of his business, Plaintiff has suffered loss of his business and income.

Prayer for Relief

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

(a) Awarding Plaintiff compensatory damages of $1,500,000.00 to replace Plaintiff's lost income as a result of Defendants' wrongdoing;

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

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

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

(e) Requiring all Defendants to issue public apologies to Plaintiff; and

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

DEMAND FOR JURY TRIAL

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

Date: October 17, 2022

Respectfully submitted,

THE POLIQUIN FIRM LLC

/s/ Ronald G. Poliquin
RONALD G. POLIQUIN, ESQUIRE
Delaware Bar ID No. 4447
1475 S. Governors Ave.
Dover, DE 19904
(302) 702-5501
ron@poliquinfirm.com

/s/ Brian R. Della Rocca, Esquire
Brian R. Della Rocca, Esquire
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Compass Law Partners

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Rockville, Maryland 20850
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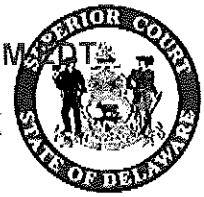
Fax: (301) 740-2297
bdellarocca@compass-law.com

Attorneys for Plaintiff

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK



EXHIBIT

A

The Mac Shop "We Fix Macs"

Quote #7469

21a Trolley Square
Wilmington DE 19806
1-888-947-MACS (Phone)
support@demacshop.com

Bill To:
Hunter Biden
202-552-9396
rhbdc@icloud.com

Data recovery for MacBook Pros: Attempt data recovery from 3 macbook pros. Recover data to store server and contact customer when complete.

Date: 4/12/19

Qty	Item No.	Description	Unit Price	Extension	Total
1.00	Labor	Hardware Level 1	$85.00	$85.00	$85.00
			Total	$85.00	$85.00
				Grand Total	$85.00

Signature:

The Mac Shop Inc. has quoted _____ business days for the completion of this repair. During this time unforeseen complications with parts and shipping can affect the time required to complete the repair. If a situation should arise that prevents the repair from being completed in the quoted time, The Mac Shop will provide an updated estimated time for completion. The Mac Shop Inc. is not liable for repairs completed outside of the quote and an exact completion date cannot be guaranteed.

Liability for damage to your computer is limited to any damage determined to be caused by the repair shop's negligent acts or omissions. This liability is limited to the total price of the repairs. Some upgrades and repairs will require updates to your system, The Mac Shop will assist in any applicable updates but it is the responsibility of the user to assure applications and software are current. The Mac Shop Understands that the most important component of your computer is your data and we will make every effort to back up and secure your data, however no data can be guaranteed.

Equipment left with the Mac Shop after 90 days of notification of completed service will be treated as abandoned and you agree to hold the Mac Shop harmless for any damage or loss of property. In the event of nonpayment, The Mac Shop reserves the right to remove any equipment or parts installed. A 90 day warranty is provided for all service and repair provided by The Mac Shop. We will happily demonstrate that the repair/upgrade is complete upon pickup of the upgrade or repair. This warranty excludes software, accidental damage, or any part not exchanged in the repair.

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT B

AO 110 (Rev. 06/09) Subpoena to Testify Before a Grand Jury

UNITED STATES DISTRICT COURT

for the

District of Delaware

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

Grand Jury Subpoena Number
19-3-LFWS-V-136

To: The Mac Shop Inc.
c/o John Paul Mac Isaac
21 Trolley Square
Wilmington, DE 19806

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: J. Caleb Boggs Federal Building Room 3001, 844 King Street Wilmington, DE 19801	Date and Time: Response Due By: Tuesday, December 17, 2019

You must also bring with you the following documents, electronically stored information, or objects *(blank if not applicable)*:

In lieu of personal appearance, please see ATTACHMENT A

Date: December 9, 2019

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:
Lesley F. Wolf
Assistant United States Attorney
United States Attorney's Office
1313 North Market Street, Suite 400
Wilmington, DE 19899-2046
Phone:(302) 573-6277

19-3-LFWS-V-13

AO 110 (Rev. 06/09) Subpoena to Testify Before Grand Jury (Page 2)

PROOF OF SERVICE

This subpoena for *(name of individual or organization)* The MAC Shop

was received by me on *(date)* 12/9/2019.

☒ I served the subpoena by delivering a copy to the named person as follows:

John Paul Mac Isaac

on *(date)* 12/9/19 ; or

☐ I returned the subpoena unexecuted because: _____.

I declare under penalty of perjury that this information is true.

Date: 12/9/2019

[signature]
Server's signature

Joshua Wilson, Special Agent, FBI
Printed name and title

FBI - Wilmington RA, 500 Delaware Ave
Server's address Suite 300 Wilmington, DE

Additional information regarding attempted service, etc:

ATTACHMENT A

1. Apple MacBook Pro Laptop Computer; Serial Number FVFXC2MMHV29
2. Western Digital (external hard drive); Serial Number: WX21A19ATFF3

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT C

From: "Mesires, George R." [redacted]@faegredrinker.com>
Date: October 13, 2020 at 6:58:59 PM EDT
To: [redacted]
Subject: George Mesires contact information

John Paul:

Thank you for speaking with me tonight. As I indicated, I am a lawyer for Hunter Biden and I appreciate you reviewing your records on this matter. Thank you.

George

George R. Mesires
Partner
[redacted]@faegredrinker.com
Connect: vCard

+1 312 356 5101 direct

Faegre Drinker Biddle & Reath LLP
311 S. Wacker Drive, Suite 4300
Chicago, Illinois 60606, USA

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT D

Op-Ed – JP Mac Isaac

I represent John Paul Mac Isaac, the Mac repair shop owner in Wilmington, Delaware who unwittingly became the target of a smear campaign by doing what he thought was right. John Paul is not a right-wing fanatic nor is he a Russian hacker.

By way of background, John Paul has owned his shop for over ten years now. Prior to that, John Paul was the "Lead Genius" at the Apple Store in Littleton, Colorado and New Castle, Delaware. Once, while employed by Apple, he found himself in a situation where, while fixing a customer's iMac, he came across seemingly illegal material. He followed protocol and contacted the authorities. No one questioned John Paul's ethics then.

Fast-forward to April 12, 2019 when a man claiming to be Hunter Biden walked into his shop. While John Paul was pleased that someone of Hunter Biden's notoriety was in his shop, he did not question why Hunter Biden was there. In fact, Hunter Biden had been referred to John Paul's shop. John Paul is well respected in the community and it would not have been uncommon for his patrons to refer others to his shop. John Paul provided a solution for one of Hunter Biden's three laptops on the spot. Another laptop was a complete write-off but the third laptop required more significant intervention. That laptop remained in the shop with John Paul. Hunter Biden returned two days later with an external hard drive to which John Paul would transfer the information.

According to John Paul, recovering the data was difficult because of the significant liquid damage to the drive. He would boot the computer and transfer as much as he could before the computer shut down. Then, he would boot up the computer again, verify what was copied, and then transfer more data until the computer shut down again. This process repeated several times. During this process, John Paul saw certain pieces of information but, at the time, he did not think anything of it. Instead, John Paul completed the work and contacted Hunter Biden to let him know. Hunter Biden never responded. As requested by Hunter Biden, a secure payment request was sent in an email but was never paid. John Paul contacted him at least one more time but Hunter Biden never responded. The policy of the shop is that items not picked up within 90 days of the completion of the services will be treated as abandoned property.

Around mid-July of 2019, news of Hunter Biden's business dealings with the Ukraine were coming more into focus and John Paul started to get uncomfortable with the information he had seen. He was unsure if the hard drive contained information pertinent to the legal investigation. At that point, he reached out to his father, a retired Colonel in the U.S. Air Force, for advice about what he should do. They both decided that going to the FBI and handing over the Mac and the drive was their best course of action. Soon thereafter, John Paul's father took a copy of the hard drive to an FBI field office in Albuquerque, New Mexico. The FBI turned John Paul's father away.

Then, in mid-October of 2019, an FBI Agent reached out to Colonel Mac Isaac and wanted to discuss the Mac and drive. At that point, Colonel Mac Isaac passed along John Paul's contact information. The FBI then reached out to John Paul and met him at his house to discuss John Paul's concerns. On December 9, 2019, the FBI served a Subpoena on John Paul for the

computer, the hard drive, and all related paperwork. He willingly gave it to the FBI and was happy to see it go.

Out of an abundance of caution, John Paul made a copy of the drive in case he was ever thrown under the bus as a result of what he knew. As John Paul watched the impeachment trial, he wondered why there was no reference to the information he had provided to the FBI. As a result, starting in February of 2020 and until July of 2020, John Paul reached out to several members of Congress to notify them of what he had in his possession. His requests fell on deaf ears.

Out of frustration, in the beginning of September, John Paul reached out to someone he thought would be able to provide the information directly to the President. That person was Rudy Giuliani. A day after John Paul reached out to Giuliani's office, Robert Costello, Rudy Giuliani's lawyer, contacted John Paul to discuss the information and John Paul's concerns.

On September 24, 2020, John Paul then submitted information about the drive to Senator Ron Johnson through the whistleblower link on Senator Johnson's website. After that submission and while Giuliani's office was still trying to verify the information, Senator Johnson released the senate report on the Biden business dealings. As we all know, prior to the New York Post's exposé, rumors began to circulate about the existence of Hunter Biden's laptop. Those rumors did not start with John Paul. We believe, due to the timing of the rumors, that the information may have been leaked by Senator Johnson's office. Then, when Rudy Giuliani released the information to the New York Post, that is when John Paul's life as a respected part of the Wilmington, Delaware community changed.

Now that the timeline has been established, what do we know?

1) We know it is Hunter Biden's laptop because we have his signature on the Repair Authorization and Hunter Biden's attorney has reached out to John Paul about the computer.
2) Hunter Biden never returned to retrieve the information rendering it abandoned property or, in other words, junk. We know that once you throw something into the trash, you relinquish your privacy rights to it, which is why so many investigations include a search of a person's trash.
3) The FBI confiscated the computer and the external hard drive and left John Paul with a receipt.
4) The information on the drive was leaked by someone prior to the New York Post exposé. John Paul has not released any information as he is cooperating with law enforcement and to do so could hurt the investigation.

What do we not know?

1) We do not know if all emails released by the New York Post were actually on the hard drive.
2) We do not know if the initial leak was from Senator Johnson's office, from Rudy Giuliani himself, or from somewhere else.

On October 26, 2020, in an opinion piece on CNN, Senator Chris Murphy discussed what he described as the "facts" that Americans need to know about Russia's interference in the U.S. election. In the piece, Senator Murphy outlines how, as part of the Senate Foreign Relations Committee, he is intimately aware of the interference methods being used by Russia. One of those methods includes "hiring unknowing Americans" to do Russia's bidding. He concludes his piece by surmising that the "strange tale of a purported Biden family laptop's data ending up in the hands of Rudy Giuliani is a likely sign that Russia's campaign to plant fictional, anti-Biden propaganda into the US political debate may just be ramping up." Then, in an effort to support his assumption, he cites a recent letter from fifty (50) former intelligence officials who argued that the laptop story had "all the hallmarks of a Russian operation."

Senator Murphy failed to share facts with the American public. First, the letter from the former intelligence officials is their opinion based on their experience. They do not have access to the information to be able to know, for a fact, that the information is not part of a Russian operation. Senator Murphy, on the other hand, works with Senator Johnson on the Foreign Relations Committee and has the ability to obtain the information in question. Perhaps he should have done so before writing an opinion piece and labeling it as "fact."

Congressman Adam Schiff, the Chairman of the House Intelligence Committee, also publicly insinuated that the laptop story is related to an alleged smear campaign against Vice President Biden that originated as part of a Russian disinformation plot. Specifically, Congressman Schiff told CNN's Wolf Blitzer that, "clearly the origins of this whole smear are from the Kremlin," and "this particular smear, though, has also been acknowledged to come from the Kremlin."

Congressman, let's be very clear, the laptop exists and it contains materials relating to Hunter Biden and Burisma. I cannot confirm that the full extent of what was released by Rudy Giuliani is, in fact, on the laptop but you, as the Chairman of the House Intelligence Committee, have the authority to find that out. As a reminder, the laptop is with the FBI.

On the other side of the aisle, Senator Johnson, Rudy Giuliani, and countless other Republicans have used the laptop provided to them as part of a political campaign. That was not John Paul's intent. He was trying to get the information to law enforcement and, in doing so, became a victim of politics. Although he is receiving support from many Americans, he is also the subject of death threats and will likely be out of business as a result of this whole affair. This take no prisoners approach to politics is where the problem lies – on both sides of the political aisle. The rest of us can easily get caught up in the information being presented as if it is fact when, in reality, much of what we hear or read is not.

The news media is not much better. Instead of reporting on the matter, news outlets are making the decision themselves as to the veracity of the claims about Hunter Biden's laptop. If you are an avid follower of CNN or Politico, you have already been led to believe that John Paul is a part of an overall Russian disinformation campaign.

Twitter and Facebook have taken it upon themselves to relegate this story to a level equal to that of conspiracy theories. The actions by these social media platforms further hurt John Paul's reputation by advancing the notion that he is a part of a Russian disinformation campaign.

The problem is not that John Paul turned over the information to those he believed he could trust, it is that politics today seems to revel in sensation and ignores the collateral damage left in its wake. Not only are our elected officials seemingly happy to obfuscate the facts in order to attack their opponents, they are also perfectly willing to throw everyday Americans under the bus for their own political gain.

I, myself, am purposely not affiliated with any political party. I do not know what John Paul's party affiliation is nor does it matter to me. John Paul is an American, like the rest of us. I honestly do not know what I would have done in a similar situation. I do know that John Paul did what he believed was right. He has not profited in any way off this situation. The reality is quite the opposite. John Paul will likely have to start a new career at the age of 44.

John Paul is not the problem, politics, biased reporting, and social media are.

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Case No. S22C-10-012 CAK

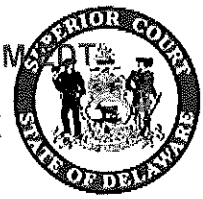

EXHIBIT E

From: Hiatt, Fred
To: Brian Della Rocca; Marcus, Ruth
Cc: NEWS - Oped Editors
Subject: RE: John Paul Mac Isaac
Date: Wednesday, October 28, 2020 3:22:39 PM
Attachments: image001.png

Brian,
I don't think this will be a good fit for us. Thanks for the look.
Fred

From: Brian Della Rocca <bdellarocca@compass-law.com>
Sent: Wednesday, October 28, 2020 11:51 AM
To: Marcus, Ruth <Ruth.Marcus@washpost.com>; Hiatt, Fred <fred.hiatt@washpost.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: RE: John Paul Mac Isaac

Thank you, Ruth.

Please find a Word version attached.

Brian

Brian R. Della Rocca, Esquire
Partner - Compass Law Partners

Phone 240-454-1013
Fax 301-740-2297
Web www.Compass-Law.com [compass-law.com] Email
BDellaRocca@Compass-Law.com
48 Maryland Ave. Suite 400, Annapolis, MD 21401
51 Monroe St., Suite 408, Rockville, MD 20850

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From: Marcus, Ruth <Ruth.Marcus@washpost.com>
Sent: Wednesday, October 28, 2020 11:49 AM
To: Brian Della Rocca <bdellarocca@compass-law.com>; Hiatt, Fred <fred.hiatt@washpost.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: Re: John Paul Mac Isaac

Fred's out of pocket but I can provide that assurance.

Ruth Marcus
Washington Post deputy editorial page editor/columnist

From: Brian Della Rocca <bdellarocca@compass-law.com>
Sent: Wednesday, October 28, 2020 11:39 AM
To: Hiatt, Fred <fred.hiatt@washpost.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: RE: John Paul Mac Isaac

I just need assurance that, if you were to turn it down, it will not be shared with anyone else inside or outside of the Washington Post.

Brian R. Della Rocca, Esquire
Partner - Compass Law Partners

Phone 240-454-1013
Fax 301-740-2297
Web www.Compass-Law.com [compass-law.com] **Email**
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51 Monroe St., Suite 408, Rockville, MD 20850

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From: Hiatt, Fred <fred.hiatt@washpost.com>
Sent: Wednesday, October 28, 2020 11:00 AM
To: Brian Della Rocca <bdellarocca@compass-law.com>
Cc: NEWS - Oped Editors <opeddesk@washpost.com>
Subject: RE: John Paul Mac Isaac

Brian,
You can share the piece with us, and if it seems like something we might publish, we can discuss length in the next stage.
Fred

From: Brian Della Rocca <bdellarocca@compass-law.com>
Sent: Wednesday, October 28, 2020 10:33 AM

To: Hiatt, Fred <fred.hiatt@washpost.com>
Subject: John Paul Mac Isaac

CAUTION: EXTERNAL SENDER

Mr. Hiatt,

I represent John Paul Mac Isaac, the owner of the Mac repair shop in Wilmington, DE. In an attempt to clear things up with the American public, I would like to submit an op-ed on his behalf. However, the op-ed I prepared exceeds the word-count limitations.

I have chosen the Washington Post to publish the op-ed because I respect the newspaper's reporting.

Please let me know the best way to proceed.

Thank you.
Brian

Brian R. Della Rocca, Esquire
Partner - Compass Law Partners

Phone 240-454-1013
Fax 301-740-2297
Web www.Compass-Law.com [compass-law.com] **Email**
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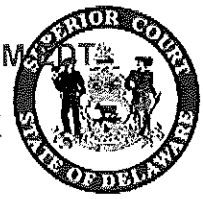

EXHIBIT F

Public Statement on the Hunter Biden Emails

October 19, 2020

We are all individuals who devoted significant portions of our lives to national security. Some of us served in senior positions in policy departments and agencies, and some of us served in senior positions in the Intelligence Community. Some of us were political appointees, and some were career officials. Many of us worked for presidents of both political parties.

We are all also individuals who see Russia as one of our nation's primary adversaries. All of us have an understanding of the wide range of Russian overt and covert activities that undermine US national security, with some of us knowing Russian behavior intimately, as we worked to defend our nation against it for a career. A few of us worked against Russian information operations in the United States in the last several years.

Perhaps most important, each of us believes deeply that American citizens should determine the outcome of elections, not foreign governments. All of us agree with the founding fathers' concern about the damage that foreign interference in our politics can do to our democracy.

It is for all these reasons that we write to say that the arrival on the US political scene of emails purportedly belonging to Vice President Biden's son Hunter, much of it related to his time serving on the Board of the Ukrainian gas company Burisma, has all the classic earmarks of a Russian information operation.

We want to emphasize that we do not know if the emails, provided to the New York Post by President Trump's personal attorney Rudy Giuliani, are genuine or not and that we do not have evidence of Russian involvement -- just that our experience makes us deeply suspicious that the Russian government played a significant role in this case.

If we are right, this is Russia trying to influence how Americans vote in this election, and we believe strongly that Americans need to be aware of this.

There are a number of factors that make us suspicious of Russian involvement.

Such an operation would be consistent with Russian objectives, as outlined publicly and recently by the Intelligence Community, to create political chaos in the United States and to deepen political divisions here but also to undermine the candidacy of former Vice President Biden and thereby help the candidacy of President Trump. For the Russians at this point, with Trump down in the polls, there is incentive for Moscow to pull out the stops to do anything possible to help Trump win and/or to weaken Biden should he win. A "laptop op" fits the bill, as the publication of the emails are clearly designed to discredit Biden.

Such an operation would be consistent with some of the key methods Russia has used in its now multi-year operation to interfere in our democracy – the hacking (via cyber operations) and the dumping of accurate information or the distribution of inaccurate or misinformation. Russia did both of these during the 2016 presidential election – judgments shared by the US Intelligence Community, the investigation into Russian activities by Special Counsel Robert Mueller, and the entirety (all Republicans and Democrats) on the current Senate Intelligence Committee.

Such an operation is also consistent with several data points. The Russians, according to media reports and cybersecurity experts, targeted Burisma late last year for cyber collection and gained access to its emails. And Ukrainian politician and businessman Adriy Derkach, identified and sanctioned by the US Treasury Department for being a 10-year Russian agent interfering in the 2020 election, passed purported materials on Burisma and Hunter Biden to Giuliani.

Our view that the Russians are involved in the Hunter Biden email issue is consistent with two other significant data points as well. According to the Washington Post, citing four sources, "U.S. intelligence agencies warned the White House last year that Giuliani was the target of an influence operation by Russian intelligence."

In addition, media reports say that the FBI has now opened an investigation into Russian involvement in this case. According to USA Today, "...federal authorities are investigating whether the material supplied to the New York Post by Rudy Giuliani...is part of a smoke bomb of disinformation pushed by Russia."

We do not know whether these press reports are accurate, but they do suggest concern within Executive Branch departments and agencies that mirrors ours. It is high time that Russia stops interfering in our democracy.

Signed by,

Jim Clapper
Former Director of National Intelligence
Former Under Secretary of Defense for Intelligence
Former Director of the National Geospatial Intelligence Agency
Former Director of the Defense Intelligence Agency

Mike Hayden
Former Director, Central Intelligence Agency
Former Director, National Security Agency
Former Principal Deputy Director of National Intelligence

Leon Panetta

Former Director, Central Intelligence Agency
Former Secretary of Defense

John Brennan
Former Director, Central Intelligence Agency
Former White House Homeland Security and Counterterrorism Advisor
Former Director, Terrorism Threat Integration Center
Former Analyst and Operations Officer, Central Intelligence Agency

Thomas Finger
Former Deputy Director of National Intelligence for Analysis
Former Assistant Secretary for Intelligence and Research, Department of State
Former Chair, National Intelligence Council

Rick Ledgett
Former Deputy Director, National Security Agency

John McLaughlin
Former Acting Director, Central Intelligence Agency
Former Deputy Director, Central Intelligence Agency
Former Director of Analysis, Central Intelligence Agency
Former Director, Slavic and Eurasian Analysis, Central Intelligence Agency

Michael Morell
Former Acting Director, Central Intelligence Agency
Former Deputy Director, Central Intelligence Agency
Former Director of Analysis, Central Intelligence Agency

Mike Vickers
Former Under Secretary of Defense for Intelligence
Former Operations Officer, Central Intelligence Agency

Doug Wise
Former Deputy Director, Defense Intelligence Agency
Former Senior CIA Operations Officer

Nick Rasmussen
Former Director, National Counterterrorism Center

Russ Travers
Former Acting Director, National Counterterrorism Center
Former Deputy Director, National Counterterrorism Center
Former Analyst of the Soviet Union and Russia, Defense Intelligence Agency

Andy Liepman
Former Deputy Director, National Counterterrorism Center
Former Senior Intelligence Officer, Central Intelligence Agency

John Moseman
Former Chief of Staff, Central Intelligence Agency
Former Director of Congressional Affairs, Central Intelligence Agency
Former Minority Staff Director, Senate Select Committee on Intelligence

Larry Pfeiffer
Former Chief of Staff, Central Intelligence Agency
Former Director, White House Situation Room

Jeremy Bash
Former Chief of Staff, Central Intelligence Agency
Former Chief of Staff, Department of Defense
Former Chief Counsel, House Permanent Select Committee on Intelligence

Rodney Snyder
Former Chief of Staff, Central Intelligence Agency
Former Director of Intelligence Programs, National Security Council
Chief of Station, Central Intelligence Agency

Glenn Gerstell
Former General Counsel, National Security Agency

David B. Buckley
Former Inspector General, Central Intelligence Agency
Former Democratic Staff Director, House Permanent Select Committee on Intelligence
Former Counterespionage Case Officer, United States Air Force

Nada Bakos
Former Analyst and Targeting Officer, Central Intelligence Agency

Patty Brandmaier
Former Senior Intelligence Officer, Central Intelligence Agency
Former Deputy Associate Director for Military Affairs, Central Intelligence Agency
Former Deputy Director of Congressional Affairs, Central Intelligence Agency

James B. Bruce
Former Senior Intelligence Officer, Central Intelligence Agency
Former Senior Intelligence Officer, National Intelligence Council

Considerable work related to Russia

David Cariens
Former Intelligence Analyst, Central Intelligence Agency
50+ Years Working in the Intelligence Community

Janice Cariens
Former Operational Support Officer, Central Intelligence Agency

Paul Kolbe
Former Senior Operations Officer, Central Intelligence Agency
Former Chief, Central Eurasia Division, Central Intelligence Agency

Peter Corsell
Former Analyst, Central Intelligence Agency

Brett Davis
Former Senior Intelligence Officer, Central Intelligence Agency
Former Deputy Director of the Special Activities Center for Expeditionary Operations, CIA

Roger Zane George
Former National Intelligence Officer

Steven L. Hall
Former Senior Intelligence Officer, Central Intelligence Agency
Former Chief of Russian Operations, Central Intelligence Agency

Kent Harrington
Former National Intelligence Officer for East Asia, Central Intelligence Agency
Former Director of Public Affairs, Central Intelligence Agency
Former Chief of Station, Central Intelligence Agency
Former Analyst, Central Intelligence Agency

Don Hepburn
Former Senior National Security Executive

Timothy D. Kilbourn
Former Dean, Sherman Kent School of Intelligence Analysis, Central Intelligence Agency
Former PDB Briefer to President George W. Bush, Central Intelligence Agency

Ron Marks
Former Officer, Central Intelligence Agency
Twice former staff of the Republican Majority Leader

Jonna Hiestand Mendez
Technical Operations Officer, Central Intelligence Agency

Emile Nakhleh
Former Director of the Political Islam Strategic Analysis Program, Central Intelligence Agency
Former Senior Intelligence Analyst, Central Intelligence Agency

Gerald A. O'Shea
Senior Operations Officer, Central Intelligence Agency
Served four tours as Chief of Station, Central Intelligence Agency

David Priess
Former Analyst and Manager, Central Intelligence Agency
Former PDB Briefer, Central Intelligence Agency

Pam Purcilly
Former Deputy Director of Analysis, Central Intelligence Agency
Former Director of the Office of Russian and European Analysis, Central Intelligence Agency
Former PDB Briefer to President George W. Bush, Central Intelligence Agency

Marc Polymeropoulos
Former Senior Operations Officer, Central Intelligence Agency
Former Acting Chief of Operations for Europe and Eurasia, Central Intelligence Agency

Chris Savos
Former Senior Intelligence Officer, Central Intelligence Officer

Nick Shapiro
Former Deputy Chief of Staff and Senior Advisor to the Director, Central Intelligence Agency

John Sipher
Former Senior Operations Officer, Central Intelligence Agency
Former Deputy Chief of Russian Operations, Central Intelligence Agency

Stephen Slick
Former Senior Director for Intelligence Programs, National Security Council
Former Senior Operations Office, Central Intelligence Agency

Cynthia Strand
Former Deputy Assistant Director for Global Issues, Central Intelligence Agency

Greg Tarbell
Former Deputy Executive Director, Central Intelligence Agency
Former Analyst of the Soviet Union and Russia, Central Intelligence Agency

David Terry
Former Chairman of the National Intelligence Collection Board
Former Chief of the PDB, Central Intelligence Agency
Former PDB Briefer to Vice President Dick Cheney, Central Intelligence Agency

Greg Treverton
Former Chair, National Intelligence Council

John Tullius
Former Senior Intelligence Officer, Central Intelligence Agency

David A. Vanell
Former Senior Operations Officer, Central Intelligence Agency

Winston Wiley
Former Director of Analysis, Central Intelligence Agency
Former Chief, Counterterrorism Center, Central Intelligence Agency

Kristin Wood
Former Senior Intelligence Officer, Central Intelligence Agency
Former PDB Briefer, Central Intelligence Agency

In addition, nine additional former IC officers who cannot be named publicly also support the arguments in this letter.

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT G

U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20535-0001

October 20, 2020

The Honorable Ron Johnson
Chairman
Committee on Homeland Security and
Governmental Affairs
United States Senate
Washington, D.C. 20510

Dear Chairman Johnson:

This responds to your letter, dated October 17, 2020, to the Federal Bureau of Investigation (FBI) regarding the authenticity of certain information provided to your Committee, including whether such information is linked to a foreign adversary's influence operation or is otherwise fraudulent. You also ask several questions about a laptop computer reportedly produced pursuant to a grand jury subpoena.

As you may know, the Office of the Director of National Intelligence has advised the American public that, in advance of the 2020 election, a number of nation-states plan to use covert and overt influence measures in an attempt to sway voter preferences and perspectives, sow discord in the United States, and undermine the confidence of Americans in our democratic process. The FBI is the primary investigative agency responsible for the integrity and security of the 2020 election, and as such, we are focused on an array of threats, including the threat of malign foreign influence operations. Regarding the subject of your letter, we have nothing to add at this time to the October 19th public statement by the Director of National Intelligence about the available actionable intelligence. If actionable intelligence is developed, the FBI in consultation with the Intelligence Community will evaluate the need to provide defensive briefings to you and the Committee pursuant to the established notification framework.

Finally, as the FBI advised the Committee in its letter, dated October 5, 2020, consistent with longstanding Department of Justice (Department) policy and practice, the FBI can neither confirm nor deny the existence of any ongoing investigation or persons or entities under investigation, including to Members of Congress. As the Inspector General firmly reminded the Department and the FBI in recent years, this policy is designed to preserve the integrity of all Justice Department investigations and the Department's ability to effectively administer justice without political or other undue outside influences. Therefore, the FBI cannot provide any additional information in response to the enumerated questions in your letter.

Thank you for your support of the FBI, its mission, and its people.

Sincerely,

Jill C. Tyson
Assistant Director
Office of Congressional Affairs

cc: The Honorable Gary Peters, Ranking Member
Senate Committee on Homeland Security and Governmental Affairs

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Transaction ID 68264385
Case No. S22C-10-012 CAK

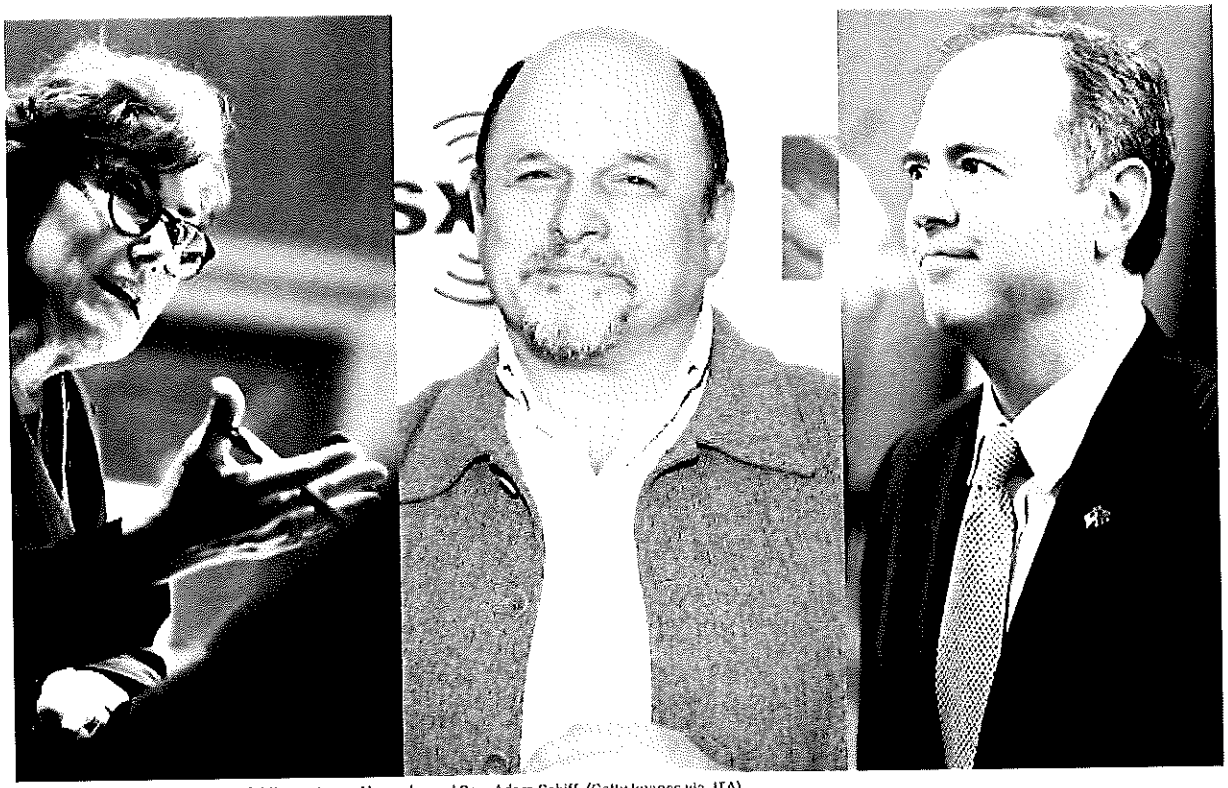
EXHIBIT H

ADVERTISEMENT

At Biden fundraiser, top Dems and Jason Alexander bash Trump, and get personal

Event, which nominee does not attend, billed as 'Virtual Conversation on Anti-Semitism,' focuses on president's role in rising hate

By RON KAMPEAS
5 August 2020, 5:28 am



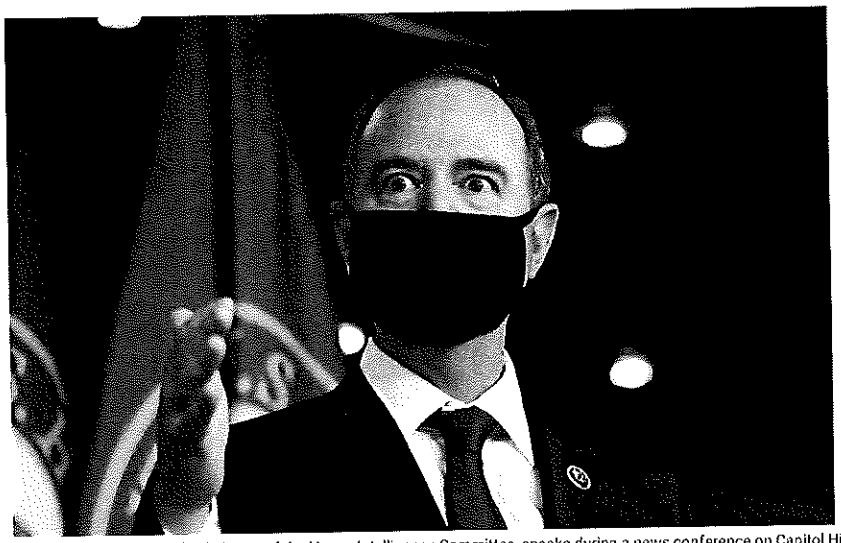
From left: Sen. Jacky Rosen, "Seinfeld" star Jason Alexander and Rep. Adam Schiff. (Getty Images via JTA)

WASHINGTON (JTA) — A fundraiser for Joe Biden on Monday night was billed as a "Virtual Conversation on Anti-Semitism" with three marquee speakers: Rep. Adam Schiff, the California Democrat who chairs the US House of Representatives Intelligence Committee; Nevada freshman Sen. Jacky Rosen; and Jason Alexander — yes, that Jason Alexander, the one famed for his portrayal of George Costanza on "Seinfeld."

The conversation, co-organized by the Biden campaign and the Democratic National Committee, included plenty of critique aimed at US President Donald Trump, whom liberal Jews accuse of stoking anti-Semitism in the US — but it also veered into poignant territory at times, offering a rare window into the politicians' personal Jewish identities. Biden did not attend.

Alexander, who moderated the talk, invited Rosen (who last year co-founded the Senate Bipartisan Task Force for Combating Anti-Semitism) and Schiff (who spearheaded Trump's impeachment proceedings last year) to draw a direct line between Trump's rhetoric and the rise in anti-Semitism during his term, evidenced in attacks such as the Pittsburgh Tree of Life and Poway synagogue shootings. Trump's defenders counter that by saying the president forcefully and unequivocally condemned anti-Semitism after the Tree of Life attack.

"We have to assume that our president has exacerbated the problem. Adam, he typically refers to you as 'Shifty Schiff,' so he obviously plays into anti-Semitic tropes and stereotypes," Alexander said. "How much do you hold him, and frankly the Republicans that echo and abet him, responsible for these increases in the amount of hate activity that we're seeing?"



Rep. Adam Schiff, D-Calif., Chairman of the House Intelligence Committee, speaks during a news conference on Capitol Hill, after a meeting at the White House, June 30, 2020 in Washington. (AP Photo/Alex Brandon)

Rosen obliged. "So many people are enabling the president," she said. "The rise of anti-Semitism just manifesting itself in different ways, whether it's the left the right, the center, we have to call it out — but regardless of that, everything starts at the top."

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Schiff also said Trump was ultimately responsible for a rise in bigotry, noting his recent appeal to "suburban housewives" that he would protect their neighborhoods from interlopers.

"The president has a unique capability to set the tone, nationally, and he has set the most ugly, bitter, divisive and sometimes racist tone of any president, certainly in my lifetime," Schiff said. "And, you know, people follow that."

Rosen said education was critical to countering anti-Semitism and referred to the Never Again Act, which funds Holocaust education, and which she helped pass this year. Holocaust survivors were dying off, she said.

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"It's important that we tell those stories, because if we don't learn from them, if we don't shine a light to educate, then we're lost," Rosen said.

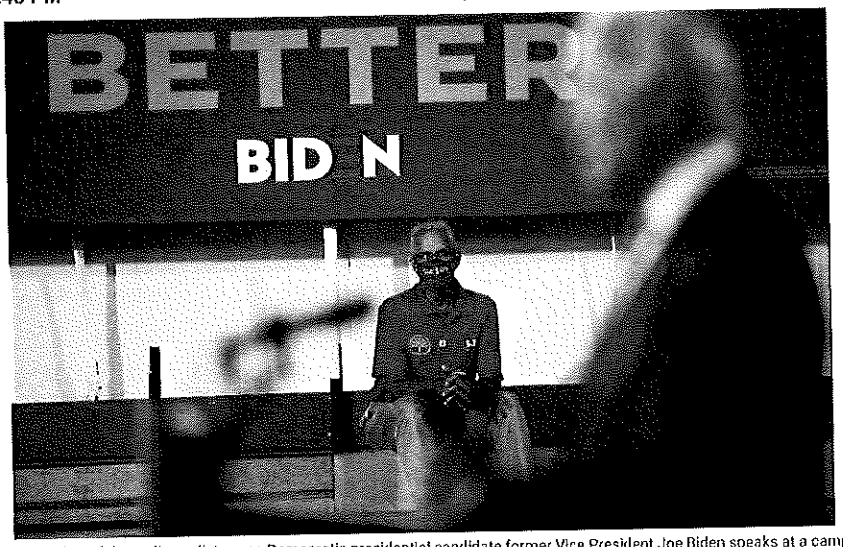
Sen. Jacky Rosen, D-Nev., speaks during a Senate Homeland Security and Governmental Affairs Committee hearing titled 'CBP Oversight: Examining the Evolving Challenges Facing the Agency,' June 25, 2020, on Capitol Hill in Washington. (Tom Williams/Pool via AP)

Alexander asked Schiff to comment on the false claim proliferating on the far right that he is in cahoots with the liberal Jewish billionaire, George Soros.

"The main one that's been circulated is that George Soros and I are related because my sister is married to his son," he said. "When that first caught on like wildfire, I called my brother and I said 'Dan I've got some good news and some bad news. The good news is we have a sister. Why didn't Mom tell us? And the even better news is, she married really well.'"

Jewish critics of Trump point to several examples that they say proves he either has a blind spot on anti-Semitism or actively engenders it. Trump has told Jewish donors that he "doesn't want your money," has said Jews who vote for Democrats are disloyal to other Jews and posted an ad during the 2016 campaign superimposing Hillary Clinton's face on a pile of money and a six-pointed star. His first statement on the Holocaust as president omitted any mention of Jews.

Biden rolled out his campaign in April 2019 with a video in which he said he was spurred to run after Trump equivocated in condemning the deadly neo-Nazi violence at a 2017 March in Charlottesville, Virginia. The assumed Democratic presidential nominee has said dozens of times that his campaign is a "battle for the soul of this nation," and often cites the rise of anti-Semitism.



A member of the audience listens as Democratic presidential candidate former Vice President Joe Biden speaks at a campaign event at the William 'Hicks' Anderson Community Center in Wilmington, Delaware, July 28, 2020. (AP Photo/Andrew Harnik)

Alexander asked Schiff and Rosen what he should tell politically conservative Jewish friends who say Trump has been good for Israel. Republicans "paint any criticism of Israel as anti-Semitic," Rosen said. "We can criticize our own government, we can criticize our spouse or family or kids, it doesn't mean you don't love them. It doesn't mean you shouldn't have a robust conversation."

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Tickets to the event, made public on Monday by Jewish Insider, were at a minimum $250, although donors could check amounts up to $50,000. About 400 people called in, raising $200,000. (The Jewish Telegraphic Agency obtained a phone call-in number, so a reporter was able to hear, if not see the proceedings.)

Alexander also asked Schiff and Rosen to personalize their Jewish experience, and that's when the conversation took a turn.

"Do you know how much your bar or bat mitzvah actually cost, within five thousand dollars?" Alexander asked at one point.

Rosen, a former synagogue president who was bat mitzvahed as an adult, knew but would not tell. Schiff said he did not know, except for the fact that his cost less than his older brother's did.

Did they remember "even one line" of their haftarah? (No.) "I remember having my voice crack," Schiff said. Had they ever not fasted on Yom Kippur? (Yes.) Had they ever built a sukkah? "Yes!" said Rosen, sounding surprised she was able to answer in the affirmative. (Schiff was a "no.")

What was their favorite Hanukkah present? "I remember my favorite present when I was a kid," Schiff said. "It was this self-winding car, you pull back a little lever and it would scoot across the floor."

"We had the piano bench," Rosen said. "That's what that's where all the Hanukkah presents were, so I just remember always going under... opening presents under the piano."

After recalling how he set a favorite Gumby doll's head alight with a menorah flame, Alexander then asked how their Jewishness led them into public service. Neither answer had anything to do with Israel or with religious learning.

Rosen recalled her grandmother discussing the "old country" and the sense of want she attached to it, and how her "bubbe" inculcated in her the idea that she should always reserve something for those less fortunate. For Schiff, it was education.

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"My father, who is 92 and is watching us this evening, telling me how, the one thing they can't take away from you is your education," he said.

Alexander also asked them to describe personal experiences of anti-Semitism. Both their answers typified the experience of their generation — Rosen is 63 and Schiff is 60.

In this July 25, 2017 file photo, actor Jason Alexander participates in the 'Hit the Road' panel during the Audience Network Television Critics Association Summer Press Tour at the Beverly Hilton on in Beverly Hills, California. (Chris Pizzello/Invision/AP, File)

"I don't have an actual memory of it but a memory of a story," Rosen said.

Her parents "took me to Florida I think must have been about 1960 or so, and we were swimming in a pool, and somebody came up to my mom and said she had to take her daughter out of the pool," Rosen said. "'She's a dirty Jew, you have to get out of the pool'."

Schiff described the experience of a pastor's candid anti-Semitism, expressed because the pastor did not realize Schiff was Jewish. "Look at the Jews, they don't have their spiritual house in order, and they say 'never again' but if they don't get their spiritual house in order, it will happen again," Schiff quoted the pastor as saying.

"It gave me a window into how much anti-Semitism there is," he said, adding that he informed the pastor he was speaking to a Jew.

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Haim Saban's Fundraiser For Joe Biden Raises $4.5 Million

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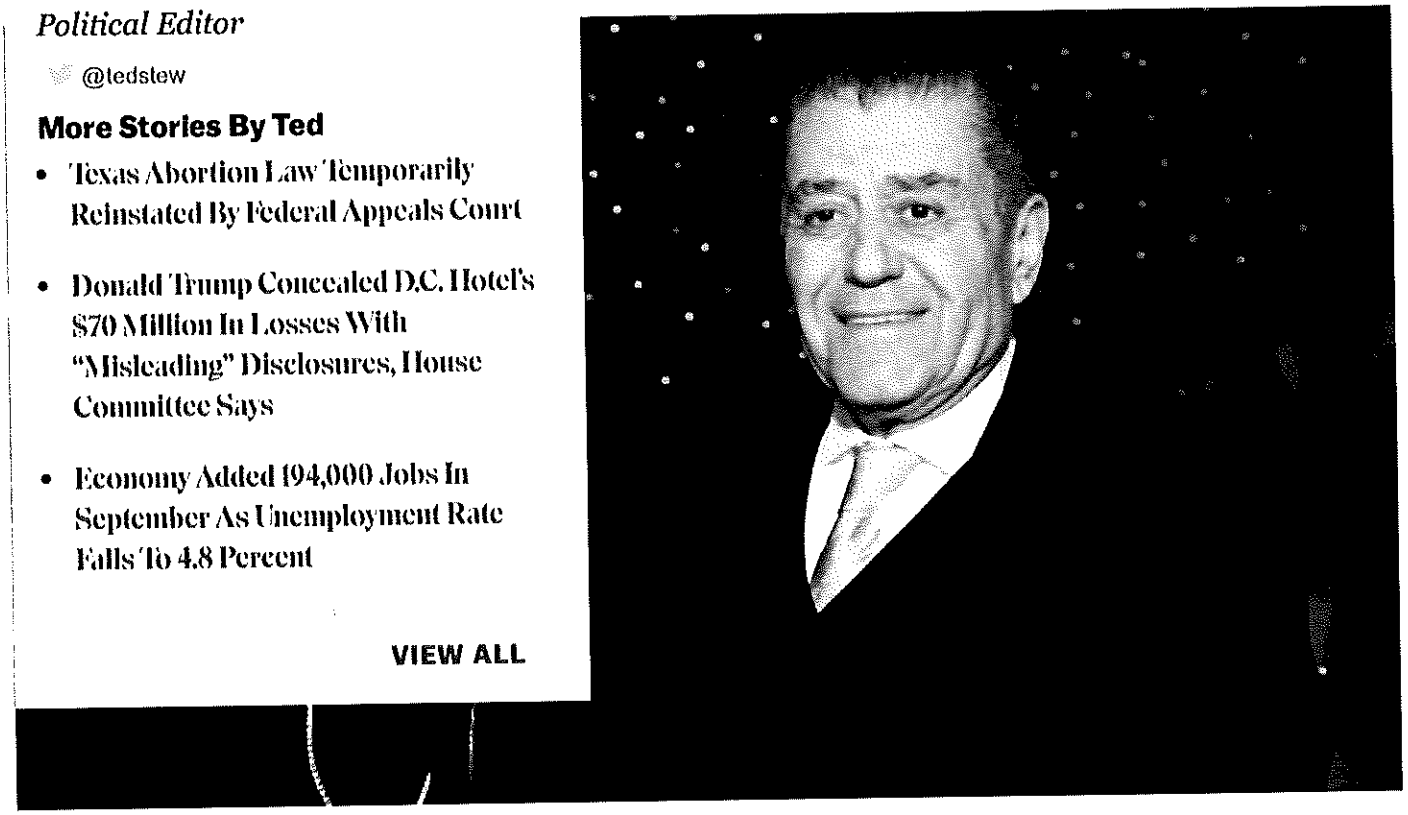

Cheryl Saban and Haim Saban in 2017.
Alex J. Berliner/ABImages via AP Images

A fundraiser for Joe Biden organized by Haim Saban raised $4.5 million on Monday, marking the media mogul's first event for the 2020 presidential race.

Saban and Rep. Adam Schiff (D-CA) cohosted the event, with 22 people in the crowd, according to a pool report. Tickets were priced at $500,000 per person (meaning not

everyone was a donor), and the other guests included Cheryl Saban, Tim Disney, Frank Gehry and Susan Disney Lord.

Saban, a longtime donor and bundler for Democrats, did not endorse during the primary, unlike 2016, when he was an early backer of Hillary Clinton.

He introduced Biden for the virtual event, and after a bit of a glitch in which Biden could not be heard ("You're on mute Mr. Vice President," Saban warned), the former vice president echoed comments he made earlier in the day about California's devastating wildfires and the connection to climate change.

"This crisis demands action, not denial," Biden said. "But as Donald Trump visits California today, we know he's not going to step up. He already said he wants to withhold aid and punish the state for not voting for him. The West is literally on fire, and it's still all about him. He likes to tweet about protecting the suburbs. That's his dog whistle on race. But wildfires and the hurricanes are literally tearing the suburbs apart."

Biden predicted that Democrats would win back the Senate. Saban has contributed almost $250,000 to the Democratic Senatorial Campaign Committee and more than $1.5 million to the Senate Majority Fund, a political action committee to win back the Senate for the Democrats.

"I hope all of you, because you've been so generous to me — I'm being greedy here — I hope you're being generous to some of the Senate candidates around the country," Biden said. "Because I think we'll win back the United States Senate this time."

This article was printed from https://deadline.com/2020/09/haim-saban-joe-biden-fundraiser-adam-schiff-1234576682/

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Rep. Adam Schiff flexes party muscle with strong fundraising for Biden, Democrats

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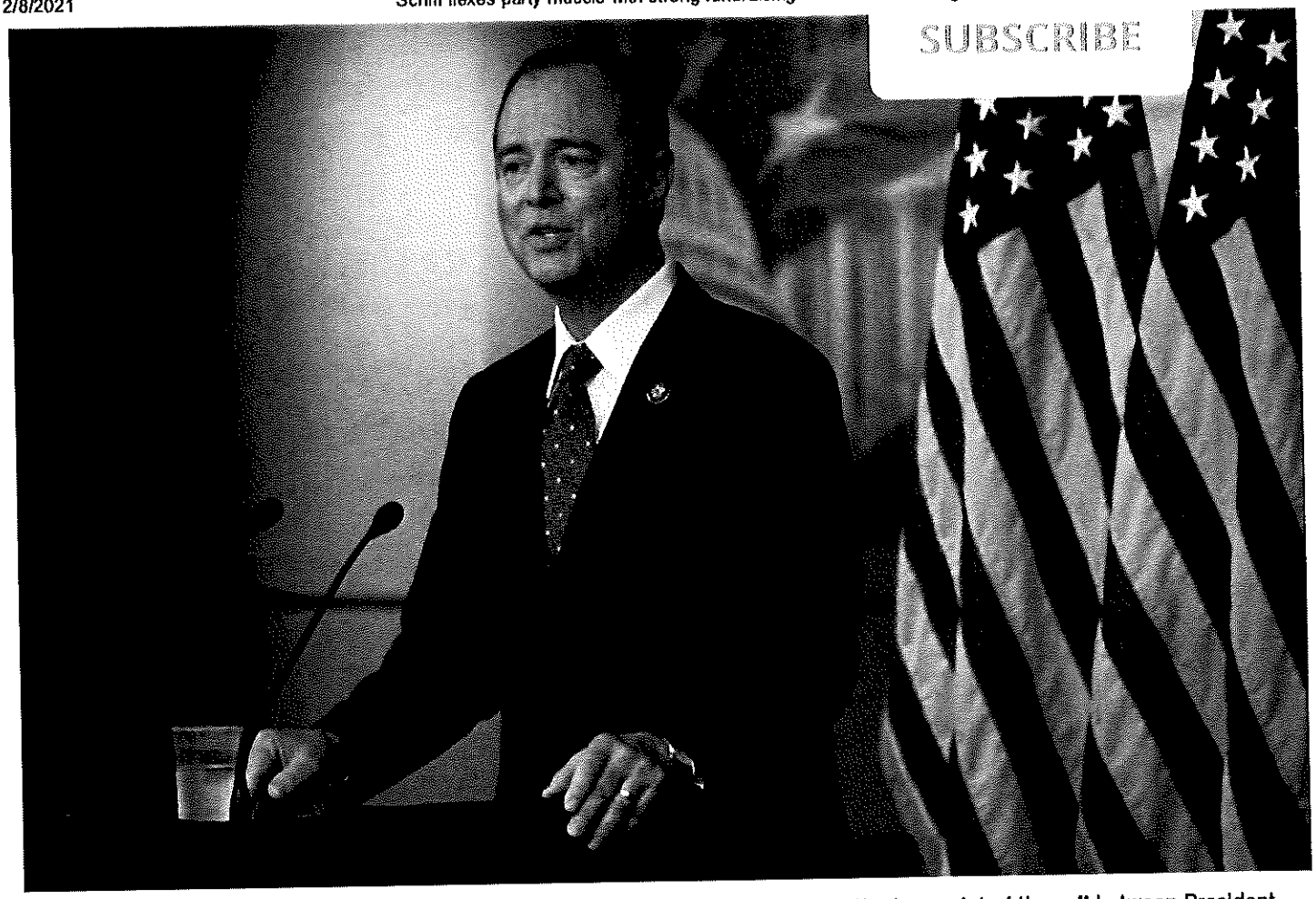

House Intelligence Committee Chairman Adam B. Schiff (D-Burbank) talks about the transcript of the call between President Trump and Ukrainian President Volodymyr Zelensky. (Kirk McKoy / Los Angeles Times)

By JENNIFER HABERKORN | STAFF WRITER

AUG. 17, 2020 4 PM PT

WASHINGTON — Rep. Adam B. Schiff is dramatically increasing his political fundraising in the wake of his high-profile role in President Trump's impeachment trial and ahead of possible vacancies next year in the U.S. Senate and House Democratic leadership — two promotions that could interest the Burbank Democrat.

Schiff has raised more than $22 million since the beginning of 2019 for his campaign committee and other Democratic groups, including Joe Biden's presidential race

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It's a sharp rise in fundraising for Schiff, who became chairn Intelligence Committee in 2019 and gained national attention as the lead prosecutor in the Senate impeachment trial of Trump this year.

He's already doubled the $9.9-million fundraising haul for his campaign and other committees in the two-year cycle before the 2018 election. In the 2016 cycle, he raised only $1 million, according to the Open Secrets website. That did not include fundraising for the party committees, which was minimal, according to his campaign.

Compared with other House Democrats, Schiff now ranks third in fundraising behind Speaker Nancy Pelosi (D-San Francisco) and Rep. Cheri Bustos (D-Ill.), who leads the committee to elect House Democrats, according to a fundraising document viewed by The Times.

Schiff's fundraising surge comes as two potential political promotions come within view.

If Biden is elected in November, Gov. Gavin Newsom would have the power to appoint a replacement for Sen. Kamala Harris, the presumptive Democratic vice presidential candidate. While Newsom is viewed as likely to choose a woman or person of color for the seat, Schiff's fundraising efforts could be seen as boosting his chances.

Schiff has eyed the Senate before. When Sen. Dianne Feinstein was deciding whether to run for a fifth term or retire in 2018, he considered running if she stepped down.

There's also a possible House leadership race if Pelosi retires. In late 2018, she agreed to step down as leader of the House Democrats by 2022 and could leave office earlier. There is no clear successor in place, and Schiff would probably be a contender for a job

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"Schiff has always felt that if you keep your head down and focus on doing the work, the rest will take care of itself. And that philosophy has put him at the center of House Democrats' effort to hold the president accountable and defend our democracy," said the aide, who asked to not be identified in discussing the issue.

Besides the impeachment trial, Schiff gained an increasingly prominent party role in 2019 when he was placed in charge of fundraising for the House Democrats who face the toughest reelection fights, called "front-line members."

These Democrats typically represent historically Republican districts and oftentimes are freshman members. While Democrats are expected to retain control of the House in the 2020 election, the most vulnerable Democrats often require the most fundraising to fend off challengers.

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The $22 million Schiff has raised since the beginning of last year includes $12.4 million for his reelection campaign, $7.3 million for the Democratic Congressional Campaign Committee and for House Democrats in tough races, more than $2.4 million for Biden and $635,000 for Democratic Senate candidates, according to figures provided by his

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California has often been called the Democratic Party's ATM SUBSCRIBE machine that Schiff has been able to successfully use to help Democrats. Half of the money raised in his reelection committee came from California donors, according to the campaign. Because Schiff's seat is considered safe, he is able to spread that money to other Democrats.

Schiff's Republican challenger, Eric Early, has raised $1.4 million as of June, according to Federal Election Commission documents. In almost any other district, Early's fundraising would be enough to provide a substantial challenge, but Democratic voters dramatically outnumber Republicans in the district.

Like the Biden fundraiser Monday, Schiff has focused on virtual events since the COVID-19 pandemic shut down in-person gatherings. Earlier this month, he held a fundraiser with actor Jason Alexander and Sen. Jacky Rosen (D-Nev.) in support of Democrats. By election day, he's expected to have done 50 events for House and Senate candidates.

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Jennifer Haberkorn covers Congress in Washington, D.C., for the Los Angeles Times. She has reported from Washington since 2005, spending much of that time roaming the halls of the U.S. Capitol. Before arriving at The Times, Haberkorn spent eight years at Politico writing about the 2010 healthcare law, a story that took her to Congress, the states, healthcare clinics and courtrooms around the country. She also covered Congress and local business news for the Washington Times. Haberkorn is a native of the Chicago area and graduated from Marquette University in Milwaukee, Wis.

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THE SITUATION ROOM

Joe Biden Campaigns In Michigan; COVID-19 Second Wave?; Trump Refuses to Condemn QAnon Conspiracy Group Labeled a Domestic Terror Threat by FBI; U.S. Investigating If Recently Published Emails are Tied to Russian Disinformation Effort Targeting Biden; Rep. Adam Schiff (D-CA) Is Interviewed About Trump Warned Last Year That Giuliani Was Being Used to Feed Him Russian Misinformation. Aired 6-7p ET

Aired October 16, 2020 - 18:00 ET

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[18:00:21]

ANNOUNCER: This is CNN breaking news.

WOLF BLITZER, CNN HOST: We want to welcome our viewers here in the United States and around the world. I'm Wolf Blitzer in THE SITUATION ROOM.

We're following breaking news.

Tonight, there are new and very ominous indicators that the United States is now plunging into the second wave of the coronavirus pandemic. In addition to the rising death toll and case count, most states are now reporting alarming spikes in infections, 21 of them seeing all-time highs, as hospitalizations around the country are soaring.

23,000 Americans may die by the end of election week.

The president watching all of this unfold right now.

Let's go to the White House first. We're watching this very closely over there.

CNN's Kaitlan Collins is joining us right now with the very latest.

What are you learning, Kaitlan?

KAITLAN COLLINS, CNN WHITE HOUSE CORRESPONDENT: Well, Wolf, you're seeing the president wrap up his rally there in Florida.

He's headed to Georgia next. And he's bringing with him this message that he's been pushing for several weeks now, but is now doubling down on it, insisting that we are rounding the corner when it comes to the coronavirus pandemic, even though, as you noted, we're seeing cases surge to record highs in some states here in the United States. And we're also learning something that the White House has been

telling us for the last several months, that the president is tested every single day, is not true.

(BEGIN VIDEOTAPE)

COLLINS (voice-over): President Trump and Joe Biden battling in battleground states today one night after going head to head, but not face to face, in town halls.

DONALD TRUMP, PRESIDENT OF THE UNITED STATES: I didn't watch sleepy Joe last night. I just wanted t see what he looked like.

COLLINS: In Florida, Trump making his pitch to seniors as polls show Biden is leading nationwide with voters 6! and older.

TRUMP: Seniors will be the first in line for the vaccine. We are rounding the turn. I say that all the time. Some of the media doesn't like hearing it. But I say it all the time. We're rounding that turn.

wearing during last night's town hall in Miami.

TRUMP: Hey, Dr. Fauci said don't wear a mask. Right?

SAVANNAH GUTHRIE, NBC NEWS HOST: At first, but then everybody agreed.

TRUMP: Oh, I don't know. Then he changed his mind. But then you have a report coming out two days ago that 85 percent of the people wearing masks catch it.

COLLINS: The CDC report Trump is referring to did not find that 85 percent of people who wore a mask got coronavirus. It wasn't even about masks and instead found that people who got COVID-19 were twice as likely to have reported eating at a restaurant than those who did not.

The president is sowing doubt about wearing a mask, even as former New Jersey Governor Chris Christie, who was recently released from intensive care after his coronavirus diagnosis, admitted he was wrong not to wear a mask at the White House.

CHRIS CHRISTIE (R), FORMER GOVERNOR OF NEW JERSEY: It was a mistake. I was led to believe that all the people that I was interacting with at the White House had been tested. And it gave you a false sense of security

COLLINS: Trump told NBC News he's not tested on a daily basis, like staff claimed, and that he can't remember i he was tested before his debate with Joe Biden.

TRUMP: I don't know. I don't even remember. I test all the time. Again, the doctors do it. I don't ask them. I test al the time.

COLLINS: Last night, Trump quickly denounced white supremacy, but stepped on his own message when he danced around condemning the conspiracy group QAnon.

TRUMP: I know nothing about it. I do know they are very much against pedophilia. They fight it very hard, but I know nothing about it.

If you'd like me to...

TRUMP: ... study the subject.

COLLINS: Trump was also pressed on why he retweeted an absurd conspiracy that Osama bin Laden's death was a hoax and President Obama and Joe Biden had SEAL Team Six killed, a baseless theory debunked by a Navy SEAL, who was there.

TRUMP: That was a retweet. That was an opinion of somebody...

GUTHRIE: But...

TRUMP: And that was a retweet. I will put it out there. People can decide for themselves. I don't take a position.

GUTHRIE: I don't get that, you're the president. You're not like, someone's crazy uncle who can just...

TRUMP: No, no. No, no.

GUTHRIE: ... retweet, whatever.

COLLINS: Joe Biden struck a more subdued tone during his own town hall, as he criticized the president and sidestepped questions about expanding the Supreme Court.

GEORGE STEPHANOPOULOS, ABC NEWS HOST: But don't voters have a right to know where you stand?

JOE BIDEN (D), PRESIDENTIAL NOMINEE: They do have a right to know where I stand. And they will have a right to know where I stand before they vote.

COLLINS: According to television ratings from the dueling town halls, more people watch to Biden than the ratings-obsessed president, who went after NBC's Savannah Guthrie for her tough questioning.

TRUMP: It's a nice pleasurable evening, as I have somebody going totally crazy last night.

(LAUGHTER)

(END VIDEOTAPE)

[18:05:03] COLLINS: And, Wolf, the president going after Savannah Guthrie there, as we are now learning something that his former chief of staff has said privately about him.

That's John kelly, of course, who was here before the president's last Chief of Staff, Mick Mulvaney. But now CNN is reporting that John Kelly has privately told friends this about the president.

And, obviously, it's not flattering: "The depths of his dishonesty is just astounding to me, the dishonesty, the transactional nature of every relationship, though it's more pathetic than anything else."

John Kelly went on to say: "He is the most flawed person I have ever met in my life."

That's what John Kelly, who worked for the president for a little under two years as his top aide, is apparently telling people about what he thinks about the president privately -- Wolf.

BLITZER: Yes, it's pretty amazing stuff, indeed.

All right, Kaitlan Collins at the White House for us, thank you very much.

Let's check in with CNN's Brian Todd. He's also working this story for us.

Brian, today, it was confirmed, more than eight million confirmed coronavirus cases here in the United States over these past several months. That's more than any other country in the world.

BRIAN TODD, CNN CORRESPONDENT: Right, Wolf.

It's really just not going well anywhere on the country right now. Just a short time ago also, the president's own surgeon general, Dr. Jerome Adams, warned about the outbreak in Wisconsin, saying that Wisconsin has positivity rates of over 10 percent and that the state is -- quote -- "going in the wrong direction."

And this comes just one day before President Trump plans to hold a large rally in Janesville, Wisconsin. This is

(BEGIN VIDEOTAPE)

TODD (voice-over): Hospital beds on the move in Albuquerque, New Mexico, with hospitals pushing capacity. Officials in New Mexico say many coronavirus patients there need to be transferred from one hospital to another throughout the state.

And, tonight, they're worried about having enough people to take care of them.

DR. DAVID SCRASE, NEW MEXICO HUMAN SERVICES SECRETARY: Our hospital leaders' greatest concern today is staffing up those beds. They point out that the health care work force that's been fighting

valiantly against COVID in New Mexico, they're getting tired. There's some people who've stepped back.

TODD: Cases have spiked to such an extent in New Mexico that the governor is telling people flat out don't leave your home if you don't have to. The virus, she says, is winning.

GOV. MICHELLE LUJAN GRISHAM (D-NM): This is the most serious emergency that New Mexico has ever faced.

TODD: Wisconsin is also seeing horrific spikes. And officials say many new cases are tied directly to virus spreads in prisons and veterans homes, like the King facility in Waupaca County.

DIANE LYNCH, WISCONSIN DEPARTMENT OF VETERANS AFFAIRS: There are 52 members currently in quarantine. And there are 25 staff members currently out of the work unit with positive COVID tests.

TODD: Wisconsin and New Mexico are two of 10 states that just reported their single highest day of new cases ever.

The numbers are daunting all the way around. The U.S. topped 60,000 new cases in a single day for the first time since August 14, 32 states today trending up in new cases. The U.S. just passed eight million total cases of this virus. And America's top experts are very worried about the months ahead.

DR. ANNE RIMOIN, UCLA EPIDEMIOLOGIST: As we move towards the winter, and the weather is getting

moment in history.

TODD: Experts say, this year, even with so many Americans desperate for some kind of celebration, holidays will have to be scaled back to combat the virus.

The CDC has just issued new guidelines for how Americans can stay safe at Thanksgiving, among them, assess th infection rates in your community, consider postponing or canceling activities. Think about having outdoor dinners, weather permitting, or hosting virtual dinners.

And limit the number of people at any gathering. Mask-wearing and distancing are more important than ever, America's leading voice on infectious disease says. And he's becoming impatient with people who aren't doing those things.

DR. ANTHONY FAUCI, DIRECTOR, NATIONAL INSTITUTE OF ALLERGY AND INFECTIOUS DISEASES: So, if you think that by getting infected and saying -- pooh-poohing the prevention modalities, that you're living in a vacuum and you're not -- no, you're becoming part of the problem.

(END VIDEOTAPE) TODD: But Dr. Fauci emphasized that it is still not too late to turn the tide for what will happen with the virus this fall and winter, if Americans act responsibly, if state and local officials take the right public health measures, and he says you can do all this without shutting the country down.

We should also note, Wolf, we found out a short time ago Dr. Fauci is going to be among the first people to see the data, the critical data that's going to tell the country whether one of those coronavirus vaccines is safe.

He is going to be among the first top experts to look at that critical data in the weeks ahead.

BLITZER: Yes. Certainly, we trust Dr. Fauci and his team very, very seriously.

Brian Todd reporting for us, thank you very much.

I want to bring in our chief medical correspondent, Dr. Sanjay Gupta, for analysis.

[18:10:00]

63,000 new infections here in the U.S. just yesterday.

The head of the National Institutes of Health, Dr. Francis Collins, just told me in the last hour he expects the daily death toll to start rising as well.

Just how dangerous, Sanjay, are these high numbers that we're seeing explode right now?

DR. SANJAY GUPTA, CNN SENIOR MEDICAL CORRESPONDENT: Well, it's very concerning, Wolf.

Obviously, if you're starting off this sort of -- this wave going into the colder weather at this high a level of viral transmission, it's just a lot that you all of a sudden can build on. If you're starting at a lower level, it takes a while to get into that sort of exponential growth.

Starting at 50,000, 60,000 newly infected people a day, if they're each potentially spreading it to two or three, you can see how significant a number that can reach quickly.

Wolf, one of the big concerns is just hospitals, right? And these are the same conversations you and I were having back in March and April. Hospital bed capacity is something that hospitals, cities are looking at all over the country right now.

And, typically, around this time of year, it's around 60 percent or so full. If we can show the map here, but in many many states around the country, hospital occupancy is already quite high. So if you're already high and going into flu season, going into

coronavirus season or worsening coronavirus season, I should say, that's a concern, Wolf. I mean, that's why a lot of planning is going on in these communities now, to say what happens if we are starting to run out of space?

Wisconsin is building these tents, these field hospitals. It's dangerous, Wolf, and a lot of planning now going into place to try and avert some of these -- some of the more tragic problems here.

BLITZER: Because, as you know, the U.S. surgeon general today warned that Wisconsin clearly going in the wrong direction, the state's positivity rate nearly 23 percent.

GUPTA: Well, let me just remind you why positivity rate is such an important thing to look at, so positivity rate of 23 percent. Out of 100 people that were tested, 23 came back positive.

What does that mean? Why is that so concerning? Well, that means that if you're getting that many coming back positive, that means you're missing a lot more people who aren't getting tested.

It's kind of like if you go fishing with the net. Put the net down, you grab a bunch of fish, you think, oh, I grabbed a bunch of fish, there must be a lot more fish down there. It's the same sort of thing with positivity rate.

So why is it dangerous, then, in a community that has high positivity rate? Well, you ask yourself, if you go out, what is the likelihood you're going to come in contact with someone who is carrying the virus? It's much higher if you have a positivity rate of over 20 percent, like we're seeing in Wisconsin.

So, you go to a rally, you're next to people, closely clustered, longer than 15 minutes. If people aren't masked, they're putting that virus into the air, outside safer than inside, but that's still a lot of virus within a rally or any kind of gathering like that. And that's the big concern.

So, even aside from anything else that's going on, in the middle of a pandemic, bringing large groups of people together is a bad idea, Wolf. It's been a bad idea for months now. We know this, and the numbers are even worse now than they were before.

BLITZER: Yes, even if it's outside, you should engage in social distancing and certainly wear a mask to protect yourself and protect everyone else.

Pfizer now says, Sanjay, that it will request an emergency use authorization for its potential coronavirus vaccine by the third week in November, if it gets positive data, no guarantee, but potentially the third week in November.

What hurdles does this vaccine need to pass?

GUPTA: You know, it's basically two hurdles. And I will preface by saying nobody knows what the data is, yet except for this independent entity known as the Data Monitoring Safety Board.

effective, this vaccine, and if two months of safety data don't show significant adverse effects.

If it crosses those two hurdles -- and Pfizer, again, they haven't seen the data, but they anticipate by middle of November that the data will be there. And if it's positive, they're going to go ahead and apply for this emergency use authorization.

That's sort of been the plan all along. But I want to again emphasize, as promising as things have been, and I'm quite optimistic about it, as there are many people, we still haven't seen the data. We have got to see that this vaccine actually works and isn't having adverse effects.

BLITZER: Got to make sure it's effective, but also we got to make sure it's safe and the side effects are really, really minimal.

GUPTA: Yes.

BLITZER: All right, Sanjay, thank you very, very much, Dr. Sanjay Gupta, always joining us with his expertise.

Just ahead: Joe Biden now says President Trump is -- quote -- "living in a dream world" after repeatedly claiming the coronavirus is about to disappear.

[18:15:00]

And, later, we will have more on the president's refusal to condemn a dangerous conspiracy theory labeled a domestic terror threat by the FBI.

(COMMERCIAL BREAK)

BLITZER: Joe Biden is taking his presidential campaign to the battleground state of Michigan in a bid to rebuild what's called the blue wall President Trump's shattered back in 2016.

CNN's Jessica Dean is tracking the Biden campaign for us. She's joining us from Michigan right now.

So, Biden is going directly after the president, Jessica, in a very, very tough -- with tough words.

health care and the Affordable Care Act really central to his closing argument here in Michigan.

[18:20:00]

He and his campaign believing that has a through line to so many issues, including Amy Coney Barrett's nomination to the Supreme Court, Republicans' efforts to dismantle the ACA, and then, of course, the coronavirus and Trump's response to the coronavirus.

Take a listen.

(BEGIN VIDEO CLIP)

BIDEN: He is still living in a dream world. He keeps telling us that this virus is going to disappear like a miracle. He said, I think, last night in his town hall -- I didn't have the pleasure of hearing it. I was doing one myself.

He said, we have turned the corner.

As my grandfather Finnegan might say were he here, he said, he has gone around the bend.

(LAUGHTER)

BIDEN: Turned the corner. My lord.

It's not disappearing. In fact, it's on the rise again. It's getting worse, as predicted. We all know the terrible price this nation has paid.

(END VIDEO CLIP)

DEAN: Meantime, at his town hall last night in Philadelphia, Joe Biden talking about a question he's dodged for weeks now. And that's whether he supports packing the Supreme Court.

He has said that he doesn't want to give that answer because it's a distraction. He said last night he promised to give his answer on that before Election Day.

making sure people turn out to the polls.

We learned today, Wolf, that Vice President Biden's perhaps biggest surrogate out there, former President Barack Obama, will hit the campaign trail for him in Philadelphia next week.

BLITZER: Eighteen days to go until November 3, Election Day, but millions, more than 20 million Americans already have voted.

All right, Jessica, thank you very much.

Let's bring in our political correspondent, Abby Phillip, and CNN political commentator Bakari Sellers. He's the author of the new book "My Vanishing Country: A Memoir."

Abby, CNN has learned that the former White House chief of staff, retired General John Kelly, has told friends tha President Trump, in his words, "is the most flawed person I have ever met in my life."

Given these very strong feelings, why won't the president's former chief of staff simply come out publicly to explain to the American people why he's so concerned about his former boss' character?

ABBY PHILLIP, CNN WHITE HOUSE CORRESPONDENT: Yes, I think that is the question.

And it's one that really I don't have a great answer to. It's not clear to me why John Kelly, who does not have a good relationship with this president and hasn't for a very, very long time, why he won't just simply say publicly what he's saying privately.

The only thing that I can gather, from my understanding of how John Kelly is as a person from people who know him, is that he is kind of a circumspect person publicly. He doesn't want to get deeply involved in the political drama.

But, at the same time, he's obviously painting a very dire picture of this person that he used to work for. And I think it stands to reason that he -- if he felt so strongly about it in private, he ought to let the public know publicly, because he's one of the people, one of the few people who has been so close to this president, worked for him for many years.

BLITZER: Yes, so many of the president's former advisers are saying similar things.

Bakari, we have also just learned that former President Obama will make his first campaign stop for Joe Biden next Wednesday in Philadelphia, Pennsylvania being a key battleground state.

This marks a long-awaited moment for the Biden campaign, doesn't it?

BAKARI SELLERS, CNN CONTRIBUTOR: It does, I mean, and I know that Joe Biden has to feel amazing to have his former boss out on the campaign trail.

Look, Barack Obama is the most popular politician in the entire country. He's the big dog. And so, when you roll him out, I mean, it's going to be energy abound for this campaign. It's going to be new wind beneath its sales, if it needs it.

Barack Obama is someone who's going to pitch a message, much like Joe Biden, of unifying this country, of bringing this country together, whether or not you're in North Carolina, or whether or not you're in Ohio or Pennsylvania. He's someone, a lot like John Kelly knows Donald Trump, Barack Obama knows Joe Biden, and he will be able to speak to his character, he will be able to speak to his fortitude and who he is.

And he will also be able to talk about a vision for this country moving forward. I'm so excited about having Barack Obama on the trail. The Republican Party doesn't have anything like it.

I mean, Larry Hogan had to vote for Ronald Reagan today.

BLITZER: Yes, the governor of Maryland. And he made a point by saying he was voting for Ronald Reagan, a symbolic statement, indeed.

And we do know that President Obama has a huge following out there to get out the vote, which will be so, so critical in this election.

Abby, only 18 days to go. We're seeing a president very much on the defensive right now. What do the locations of President Trump's campaign stops reveal to you about how his team is viewing this race with only a few days left?

PHILLIP: Well, I think probably the only thing that you need to know about how the president's team is viewing this race is where he is tonight, where he's heading right as we speak, Macon, Georgia.

He's going to Georgia to try to defend that state that he won the last time around. That should be a state that he should be able to win this time around if he were in a strong position.

He was also campaigning in North Carolina, another state. He should be able to at least, if he were in a strong position, he -- as a Republican, he ought to be able to win that state pretty easily without investing resources in the last 20 days.

This is a president who is defending a map and a very narrow path to victory. And that narrow path may very well require that he wins North Carolina. It will also require that he wins Florida, which is a state that he's been campaigning in recently as well.

And so the Trump campaign, despite what the president is saying, knows that this is a map that is not trending in their direction. They're not in the position to expand the map. They are only trying to defend what they did last time around.

And I think that defensive territory is actually a much broader territory than they would like it to be at this point.

BLITZER: Very important, indeed.

All right, Abby Phillip and Bakari Sellers, guys, thanks very much.

An important and quick programming note for our viewers: Tune in this weekend for an inside look at the Trump presidency from those who worked for the president, Jake Tapper, a CNN special report, "The Insiders: A Warning From Former Trump Officials." That will air Sunday 9:00 p.m. and midnight, 9:00 p.m. and midnight Eastern, right here on CNN, right after our special edition of THE SITUATION ROOM.

Just ahead, we will have more on President Trump's embrace of yet another dangerous conspiracy group, QAnon, which the FBI calls a domestic terror threat. And, later, Congressman Adam Schiff is standing by to join me live

We will be right back.

(COMMERCIAL BREAK)

[18:30:00]

BLITZER: Anti-extremist organizations are sounding the alarm after President Trump refused to condemn QAnon a conspiracy group that's been labeled a domestic terror threat by the FBI.

Let's continue the discussion with the CEO of the Anti-Defamation League, Jonathan Greenblatt. Jonathan, thanks so much for joining us.

Let me remind you and our viewers what the president said about this dangerous group last night. Watch this.

(BEGIN VIDEO CLIP)

TRUMP: I know nothing about QAnon. I know very little.

GUTHRIE: I just told you.

TRUMP: You told me, but what you told me doesn't necessarily make it fact, I hate to say that. I know nothing about it. I do know they are very much against pedophilia. They fight it very hard. But I know nothing about it.

REPORTER: They believe it is a satanic cult run by the DNC.

(END VIDEO CLIP)

BLITZER: He's clearly not condemning this conspiracy theory. The president of the United States actually encouraging a totally insane movement out there as he pour -- pouring fuel on the fire, Jonathan.

JONATHAN GREENBLATT, CEO, ANTI-DEFAMATION LEAGUE: Yes. You know, Wolf, as I said last night, as soon as I saw that, it is shockingly irresponsible that President Trump refused to disavow QAnon, which, as you

And, look, the most generous thing I can say here tonight is that claiming ignorance is just absolutely unacceptable. When you're the president of the United States, you just can't credibly say, I don't know who David Duke is or I don't know who the Proud Boys or I don't know what QAnon is, particularly when the president is on record is saying he watches cable television news all the time. I mean, obviously, he knows exactly who these people are, Wolf.

And if you're not willing to call out a domestic terror threat, a group that wants to cause violence to the home land I mean, that's a dereliction of duty at best.

BLITZER: Yes. The other day, he said the -- he said this. He said, well I don't know much about the movement other than I understand they like me very much, which I appreciate. So he knows at least that much, and it's pretty shocking that he simply can't condemn this organization. Tell us why they're so dangerous.

GREENBLATT: Well, look, QAnon started in about 2017 on a service called 4chan. And, again, it is a sort of a shadowy conspiracy movement. I think their followers are probably in the tens of thousands. But they believe there is a deep state conspiracy, again, run by cabal of pedophiles. And their lunatic rantings have sort of move from the sewers of the internet, Wolf, into mainstream politics, in large part because of moments last night.

You know, at the ADL, we track extremists. And I can tell you, on QAnon boards today, we watch them. And thes extremists believe last night was a huge win. They think it was a win because simply being discussed on a platform like, you know, a broadcast news program, to them, feels like a victory.

And when President Trump claims he doesn't know what they are but actually states what they believes as their core purpose, fighting imaginary satanic pedophiles, they think he is code -- you showing them code.

[18:35:05]

He is approving of them. And that's why they feel emboldened today.

And, look, like I said a moment ago, whether it was a QAnon enthusiast trying to attack a pizza parlor in D.C. or other acts of violence, these people are dangerous and they don't deserve to be dignified by the president of the United States or anyone in public life.

concern?

GREENBLATT: Again and again. We've spoken to people at the highest levels of government publicly and privately to explain that in order to eliminate this kind of threat, you've got to denounce it clearly and cogently.

But I must say, I mean, I've never had a moment like this before that I have seen in public life. There are plenty of responsible politicians on both sides of the aisle. But when the president himself signals that this is somehow normal, that it's just simply a group he's not aware of, I've got to say it sends them a signal. They feel emboldened by this.

They already think, Wolf, that the president is re-tweeting their memes, right? And a lot -- and suggesting there somehow normal, it is giving them the entree they are looking for into American public life.

BLITZER: All right, Jonathan thanks very much. Jonathan Greenblatt of the ADL, I appreciate you joining us. We're going to stay on top of this story for our viewers.

Just ahead, I'll speak live with Congressman Adam Schiff about a new probe into a potential Russian disinformation campaign targeting Joe Biden and his son, Hunter.

Plus, multiple states are now reporting a huge surge in early voting. Will 2020 set a record for turnout? We'll be right back.

(COMMERCIAL BREAK)

[18:40:00]

BLITZER: Federal authorities, including the FBI, are investigating whether recently published emails that purport to deal -- to detail, I should say, the business dealings of Joe Biden's son, Hunter, are connected to an ongoing Russian disinformation effort targeting the Biden campaign in the days leading up to the election.

Let's discuss with the Chairman of the House Intelligence Committee, Congressman Adam Schiff. Congressman, thanks so much for joining us.

REP. ADAM SCHIFF (D-CA): Well, we know that this whole smear on Joe Biden comes from the Kremlin. That' been clear for well over a year now that they've been pushing this false narrative about the vice president and his son.

And, you know, the idea that the president, that the White House Counsel and others were made aware that Giuliani was being used by Russian intelligence and using Russian intelligence in the sense of meeting with an agent of the Kremlin and pushing out this Kremlin false narrative, the idea that they were knowing and still on the floor of the Senate during the impeachment trial, pushing this Kremlin narrative is pretty breathtaking.

But I guess at this point we can't be shocked by anything this administration does, no matter how craven. But, clearly, the origins of this whole smear are from the Kremlin, and the president is only too happy to have Kremlin help and try to amplify it.

BLITZER: It's not like Rudy Giuliani is peddling this information in a vacuum, Congressman. Take a look at this picture of the president in the Oval Office holding up a copy of the New York Post touting this conspiracy theory. It's made its way all the way to the commander in chief with a big smile on his face.

SCHIFF: Yes. Well, look, I think we know who the driving force behind this smear has been all along and it's beer the president and the Kremlin. The Kremlin has an obvious interest in denigrating Joe Biden. They want Donald Trump to win.

They recognize he's a weak president. He's been utterly unwilling to stand up to Putin and other autocrats. He has diminished NATO. He has criticized and weakened our alliance with our transatlantic partners. He's been the gift that doesn't stop giving for the Kremlin. So, clearly, they want to help him. So they want to denigrate the vice president. The Intelligence Community has made that abundantly clear.

And this particular smear though has also been acknowledge to come from the Kremlin, and there it is from the Oval Office, another wonderful propaganda coup from Vladimir Putin, seeing the president of the United States holding up a newspaper promoting Kremlin propaganda. It's really incredible.

BLITZER: The Washington Post, as you saw, is reporting that when the president was actually warned of concern about Giuliani, where he was getting all this information, warned by U.S. intelligence, law enforcement

SCHIFF: Well, it's a big part of the problem. And we know for a long time, look, Rudy Giuliani doesn't, you know run the president, the president runs Rudy Giuliani. Giuliani is doing the president's bidding. He was doing the president's bidding late last year and earlier this year in Ukraine.

[18:45:02]

He was doing the president's bidding when he was pushing out this smear and trying to get the Ukrainians to push out this smear of his opponent because he was deathly afraid of being exactly where we are right now, which is less than three weeks from the election, losing badly to Joe Biden.

But the fact that he would continue to do it, I guess at this point shouldn't surprise us. But this is the story of Donald Trump -- utter unwillingness to stand up to the Kremlin, willingness to use their help no matter how dishonest or disreputable, a willingness to undermine our own elections by getting Kremlin help and amplifying it And there's only one remedy at this point and that's to vote him out.

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

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

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

But we do know this: the Russians are once again actively involved in trying to denigrate the vice president, Donald Trump is helping them, and we know that they are amplifying the president's misinformation about absentee ballots.

This is another gift the president is giving the Russians. Unlike 2016 when the Russians had to make up this stuff,

fair election. The Kremlin just has to push out that false narrative by the president of the United States.

BLITZER: Congressman Adam Schiff, thank you so much for joining us.

SCHIFF: Thank you, Wolf.

BLITZER: All right. Just ahead, more than 20 million general election ballots have already been cast here in the United States as more states report record increases in early voting.

We'll be right back.

(COMMERCIAL BREAK)

[18:52:10]

BLITZER: With just 18 days to go until the election here in the United States, states across the country are seeing huge turnout for early voting. And we're learning more about how many Americans have already cast their ballots

CNN's senior White House correspondent Pamela Brown is tracking all of this for us.

(BEGIN VIDEOTAPE)

UNIDENTIFIED FEMALE: I see it as probably being one of the most important elections in my lifetime going forward.

PAMELA BROWN, CNN SENIOR WHITE HOUSE CORRESPONDENT (voice-over): And it seems she's not alone. Not by a long shot.

More than 20 million Americans have already voted according to data from 45 states and Washington, D.C. analyzed by CNN, Edison, and Catalyst.

In North Carolina, these long lines on the first day of early voting Thursday were the first indicator of huge turnou in the Tar Heel State. The state board of elections is tweeting that more than 330,000 voters cast ballots on day

In Georgia, they've seen a 62 percent increase in early, in-person voters compared to the same time four years ago. A similar story in Tennessee, where early voting in person or by mail started yesterday. And they've already seen a 91 percent increase compared to 2016. UNIDENTIFIED FEMALE: I think more of the millennial and younger ar a

little bit more aware and maybe are more wanting to get out there and more aware of the issues.

BROWN: In Pennsylvania, the secretary of state says she expects that full results from mail-in ballots won't be available until the Friday after Election Day.

KATHY BOOCKVAR, PENNSYLVANIA SECRETARY OF STATE: Sometimes you might have an omission or an illegible postmark, received three days later, they can be counted.

BROWN: And in Michigan today, the secretary of state there announcing that people can't carry guns on election day at polling places, saying in a statement she's, quote, committed to ensuring all eligible Michigan citizens can freely exercise their fundamental right to vote without fear of threats, intimidation, or harassment."

UNIDENTIFIED FEMALE: I don't feel he's been treated fairly by the Democrats at all.

BROWN: In Florida, the edge Democrats have in voter registration is narrowing. New data from the state shows about 134,000 more Democrats are registered to vote than Republicans, which is down from 2016, when they led by about 327,000.

And in California --

UNIDENTIFIED FEMALE: You know what? It's not -- you can't just trust anybody right now.

BROWN: That frustration, part of a week-long drop box drama, which today appears to have been ended. The secretary of state announcing this afternoon the California Republican Party agreed to no longer deploy these unofficial ballot drop boxes, which were found in at least four counties.

[18:55:03]

ARNOLD SCHWARZENEGGER (R), FORMER CALIFORNIA GOVERNOR: It's a stupid thing they're doing right now with these ballot boxes.

(END VIDEOTAPE)

BROWN: And, Wolf, in Florida, election officials are taking steps to remove ex-felons who owe court debts from the voter rolls. Of course, this comes after a Democratic led effort to raise millions of dollars to pay off those -- that debt that the court debt to those ex-felons can vote after a ruling earlier this year. But now, we're learning election officials are taking steps to remove those ex-felons who owe debt from the voter rolls.

BLITZER: All right. Pamela Brown, thank you very much.

And we'll have more news right after this.

(COMMERCIAL BREAK)

BLITZER: I'll be back for a special edition of THE SITUATION ROOM tomorrow, 6:00 p.m. Eastern.

Until then, thanks for watching.

"ERIN BURNETT OUTFRONT" starts right now.

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- OPINION
- REVIEW & OUTLOOK

All the Adam Schiff Transcripts

Newly released documents show he knew all along that there was no proof of Russia-Trump collusion.

By
The Editorial Board
May 12, 2020 7:29 pm ET

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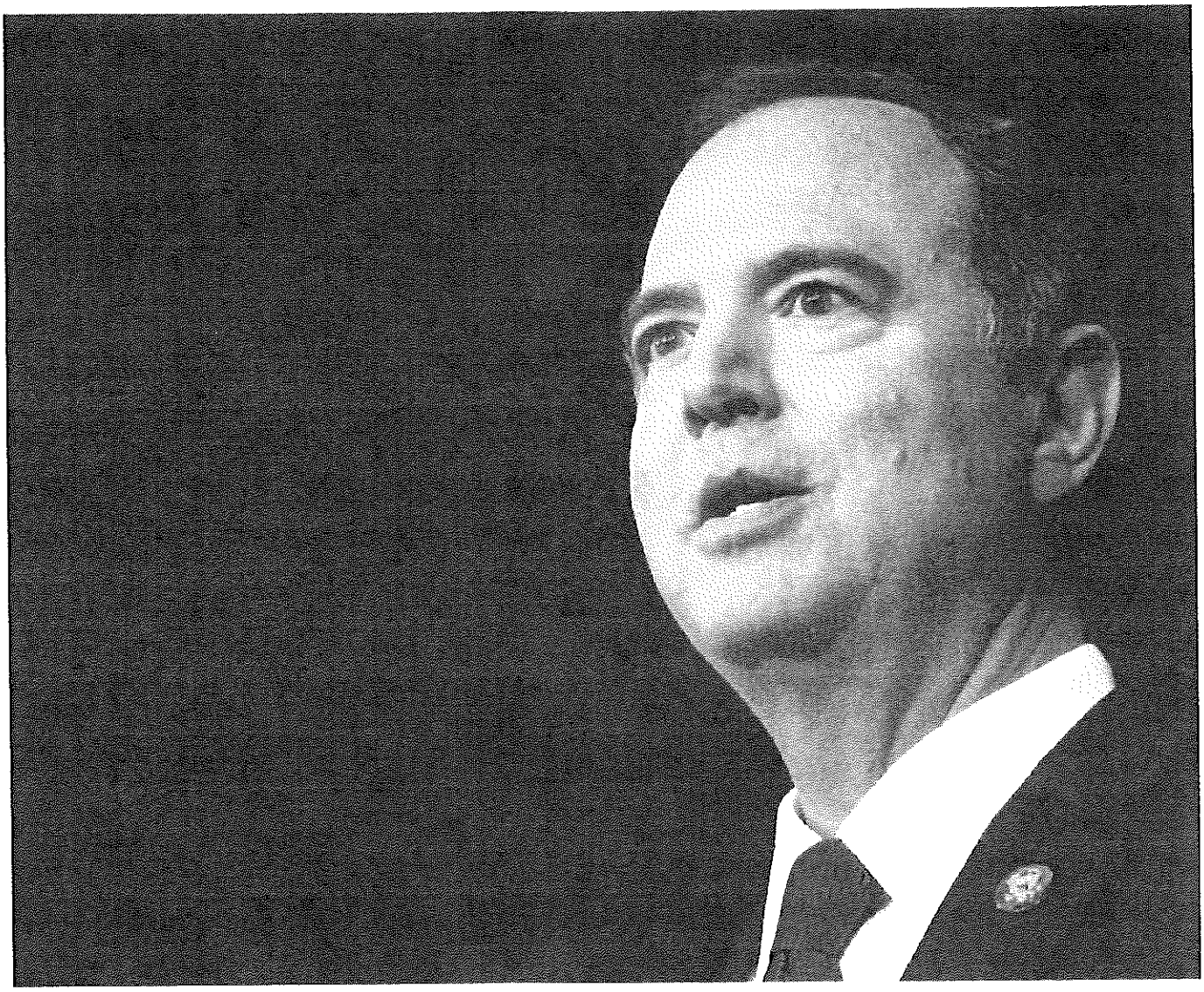

Newly released documents show he knew all along that there was no proof of Russia-Trump collusion.

By
The Editorial Board
May 12, 2020 7:29 pm ET

Rep. Adam Schiff on Jan. 28.
PHOTO: JACQUELYN MARTIN/ASSOCIATED PRESS

Americans expect that politicians will lie, but sometimes the examples are so brazen that they deserve special notice. Newly released Congressional testimony shows that Adam Schiff spread falsehoods shamelessly about Russia and Donald Trump for three years even as his own committee gathered contrary evidence.

The House Intelligence Committee last week released 57 transcripts of interviews it conducted in its investigation into Russia's meddling in the 2016 election. The committee probe started in January 2017 under then-Chair Devin Nunes and concluded in March 2018 with a report finding no evidence that the Trump campaign conspired with the Kremlin. Most of the transcripts were ready for release long ago, but Mr. Schiff oddly refused to release them after he became chairman in 2019. He only released them last week when the White House threatened to do it first.

Now we know why. From the earliest days of the collusion narrative, Mr. Schiff insisted that he had evidence proving the plot. In March 2017 on MSNBC, Mr. Schiff teased that he couldn't "go into particulars, but there is more than circumstantial evidence now."

In December 2017 he told CNN that collusion was a fact: "The Russians offered help, the campaign accepted help. The Russians gave help and the President made full use of that help." In April 2018, Mr. Schiff released his response to Mr. Nunes's report, stating that its finding of no collusion "was unsupported by the facts and the investigative record."

None of this was true, and Mr. Schiff knew it. In July 2017, here's what former Director of National Intelligence James Clapper told Mr. Schiff and his colleagues: "I never saw any direct empirical evidence that the Trump campaign or someone in it was plotting/conspiring with the Russians to meddle with the election." Three months later, former Obama Attorney General Loretta Lynch agreed that while she'd seen "concerning" information, "I don't recall anything being briefed up to me." Former Deputy AG Sally Yates concurred several weeks later: "We were at the fact-gathering stage here, not the conclusion stage."

The same goes for the FBI agents who started the collusion probe in 2016. Most remarkable, former FBI Deputy Director Andrew McCabe admitted the bureau's reason for opening the case was nonsense. Asked in December 2017 why the FBI obtained a secret surveillance warrant on former Trump aide Carter Page, rather than on George Papadopoulos (whose casual conversation with a foreign diplomat was the catalyst for the probe), Mr. McCabe responded: "Papadopoulos' comment didn't particularly indicate that he was the person that had had—that was interacting with the Russians." No one else was either.

On it went, a parade of former Obama officials who declared under oath they'd seen no evidence of collusion or conspiracy— Susan Rice, Ben Rhodes, Samantha Power. Interviews with Trump campaign or Administration officials also yielded no collusion evidence. Mr. Schiff had access to these transcripts even as he claimed he had "ample" proof of collusion and wrote his false report.

He's still making it up. Last week he said the transcripts contain "evidence of the Trump campaign's efforts to invite, make use of, and cover up Russia's help in the 2016 presidential election."

The question we'd ask our friends in the media is when are they going to stop playing the fool by putting him on the air? Mr. Schiff is a powerful figure with access to secrets that the rest of us don't have and can't check. He misled the country repeatedly on an issue that consumed American politics.

President Trump often spreads falsehoods and invents facts, but at least he's paid a price for it in media criticism and public mistrust. An industry of media fact checkers is dedicated to parsing his every word. As for Mr. Schiff, no one should ever believe another word he says.

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Location & Hours

21A Trolley Sq
Wilmington, DE 19806

Get directions

Mon	3:00 PM - 6:00 PM	
Tue	11:00 AM - 7:00 PM	Open now
Wed	11:00 AM - 7:00 PM	
Thu	11:00 AM - 7:00 PM	
Fri	11:00 AM - 7:00 PM	
Sat	10:00 AM - 4:00 PM	
Sun	Closed	

Edit business info

Amenities and More

✓ Accepts Credit Cards

Ask the Community

Yelp users haven't asked any questions yet about **The Mac Shop**.

Ask a Question

Recommended Reviews

Search within reviews

Sort by Yelp Sort

Start your review of **The Mac Shop**.

Michelle H.
Owatonna, MN
0 friends
12 reviews

10/15/2020

Look at all the infantile haters, liberals that want to tank a business because they don't want any negative news about their racist geriatric president wanna be.
Poor things, Biden is EVERYTHING they accuse President Trump of.
It would be cute, if it wasn't so pathetic to watch.

Useful 45 | Funny 38 | Cool 13

Jeff Y.
Los Angeles, CA
34 friends
26 reviews
1 photo

10/14/2020

1 photo

I was visiting from out of town for a business meeting when my laptop mysteriously stopped booting. Somewhat frantic, I went on line with my IPhone to try my luck with a local repair shop and relieved, I located a business that advertised themselves as Mac specialists. It was The Mac Shop.

Ordinarily I would only trust Apple with my device and my data, but with no Apple Store in the area, I had no time to waste, so I settled for second best. Walking into the store I was a little taken about, which gave me pause. It was a dingy and dilapidated, with dudes speaking in hushed tones in what sounded like Russian accents. The place looked like a Mac graveyard with with some Macs dating back 30 years, with no sighting of any Mac newer than 10 years. Oddly, they had Trump2020 campaign banners everywhere, a guy wearing a Q'Anon T-shirt was chatting with who seemed to be the owner, and the ever-present Fox News was loudly blaring on a TV in the background. Some ghoulish looking figure that appeared a lot like Rudy Giuliani was being interviewed by one of those gabby, flatulent Fox News TV hosts.

Because I was in a hurry, I went against my better judgement and abruptly handed my laptop over to some guy named Igor (He kept calling me Hunter for some reason). When I asked for a receipt, he assured he would email it to me if I only gave him my email address and laptop password, and only after he had could take a good look at my hard drive, whatever that meant. He quickly corrected himself and stated that he meant after only after he could do a thorough review of my system. By that time Igor seemed to be perspiring a bit. It was very odd.

When I phoned later that day only to be told that my hard drive would need to be replaced and OS re-installed. As a customer courtesy, they offered to securely dispose of any used parts, free of charge. I politely

declined and asked that they return all replaced parts, please. With no other good options, I reluctantly agreed, and was told to come back by the end of the day. I arrived just as they were closing for the day. As they reached over the counter to hand me my newly repaired laptop, I asked about my faulty hard drive. They apologized profusely and explained that during the course of the repair the hard drive was damaged and could not be saved and disposed of immediately because it was an environmental risk. Astonished, and speechless, I was resigned to leave without it, and turned to leave and that's when I heard it.

From Igor's pocket to the the floor rocketed out what was likely my old hard drive, hitting the floor with a loud thud. It had the word "Hunter" written on it in red marker. I had no idea who or what this Hunter was but I just shrugged my shoulders and headed out as fast as my legs would carry me.

Next time, I think, I will just go to the Apple Store.

Useful 67 | Funny 104 | Cool 15

demacshop.com

(888) 947-6227

Get Directions

Courtney C.
Oklahoma City, OK
128 friends
20 reviews
3 photos

10/14/2020

Do not recommend.

Pros: might be good at recovering data
Cons: might give your data to Rudy Giuliani and share it with the New York Post

Useful 121 | Funny 92 | Cool 19

Is this your business?
Claim your business to immediately update business information, respond reviews, and more!

Claim This Business

Roger J.
Waltham, MA
0 friends
3 reviews

10/15/2020

BE CAREFUL WITH THIS SHOP! They copy all your data and then will share it with whoever they want! Very unethical business practices. They steal the data off the hard drive by imaging it without your knowledge they can gain access to all your banking information , social security numbers, passwords, you name it .

Useful 86 | Funny 23 | Cool 7

You Might Also Consider

Sponsored ⓘ

Empire Multi Services

Auto Tag Services read more

Kyle K.
Kent, WA
102 friends
7 reviews
2 photos

10/14/2020

They like to hack their customers computers and inject themselves erroneously into politics. - tied to corrupt lawyers who work with Known Russian spies and agents.

Useful 100 | Funny 35 | Cool 7

uBreakiFix
5
23.8 miles

Get your device diagnosed for free at uBreakiFix Glassb us a call on... read more

Devon E.
Manhattan, NY
3 friends
26 reviews

10/14/2020

I came in to get my waterlogged laptop fixed, but then forgot to come by and pick it up. Thankfully, the lovely owner of this store decided to snoop through my files, then call the FBI, clone my hard drive and give a copy to Rudy Giuliani. I knew I shouldn't have put that "Beau Biden Foundation" sticker on it!

Useful 88 | Funny 53 | Cool 9

Jill S.
Portland, ME
100 friends
97 reviews
12 photos

10/14/2020

It's a pass for me. You drop off your laptop for repair and the next thing you know fake emails have been created and given to Rudy Giuliani. What a headache.

Useful 78 | Funny 43 | Cool 6

Pretzelcuatl L.
Los Angeles, CA
3 friends
64 reviews
9 photos

10/14/2020

Yep, this is the place where you want to take your computer if you want the shop owner to turn your data over to vampire Rudy Giuliani so he can use it to destroy your life. True story.

Useful 71 | Funny 23 | Cool 4

E P.
Amherst, MA
1 friend
68 reviews
4 photos

10/14/2020

It's amazing how far some people will go to sell out their own country. Can't recommend this shop unless you enjoy pc repairs with a side of treason.

Useful 67 | Funny 24 | Cool 3

Sandy K.
Glen Mills, PA
0 friends
3 reviews

10/14/2020

If you want your data stolen and sold to the Russians, Rudy Giuliani and Rupert Murdoch, this is the place for you. If you want honest repair service go somewhere else.

Useful 69 | Funny 17 | Cool 4

B R.
San Francisco, CA
0 friends
1 review

10/14/2020

I brought my Mac here to get fixed and the Owner, John Paul Mac Isaac (If only the "Mac" was a biblical name, man where he went wrong?) took my Computer and falsified some documents on it. He then alerted the FBI about the falsified emails. When I asked him about it he just started yelling SETH RICH and OBAMAGATE and started turning RED while muttering "maga" over and over again. SCARY SITUATION. Im going to recommend a more "level headed" and "ethical" repair shop, to get your work done at.

Useful 64 | Funny 26 | Cool 5

Dalia S.
Central LA, Los Angeles, CA
0 friends

10/14/2020

This business cannot be trusted to safeguard your private data on your computer. They rifle through your private files on your computer

3 reviews

looking for salacious or incriminating information and then make copies of it and turn it over to your rivals. Beware of this unethical business!

Useful 60 | Funny 12 | Cool 2

Matt B.
Hockessin, DE
0 friends
4 reviews

10/15/2020

Apparently your data is not secure with this store. Too bad, we all expect that as a minimum.

Useful 55 | Funny 10 | Cool 2

Jason T.
Wilmington, DE
4 friends
82 reviews

10/15/2020

Owner claims to have stolen information off a computer, reported it to a friend who reported it to Rudy who then reported it to the NY Post. Mind you the person he stole the information from hasn't lived in Delaware for years. If you want someone looking around your stuff and reporting it to third parties, come here!

Useful 53 | Funny 10 | Cool 3

Mike D.
Wilmington, DE
13 friends
12 reviews
1 photo

10/15/2020

Apparently they aren't very big on privacy issues. Go elsewhere if you want your personal info to remain private.

Useful 52 | Funny 8 | Cool 2

Ryan G.
Wilmington, DE
6 friends
4 reviews

10/15/2020

John Paul will even make free copies of your hard drive, without you even asking, and hand them over to others just to make sure everyone is safe! No charge. (Edit - allegedly based on his interview with multiple media outlets)

Swell guy

Useful 47 | Funny 11 | Cool 3

Bill D.
Avondale, PA
0 friends
1 review

10/14/2020

True patriots here. Sharing the truth about crooked hometown politicians who are selling out our country for personal gain. Supports American freedom not communist sellots!

Useful 33 | Funny 33 | Cool 15

Jordan H.
Rhodes Ranch, Las Vegas, NV
0 friends
4 reviews
2 photos

10/14/2020

Great place! They fixed my laptop on the spot. Minimal charge. A lot cheaper than Apple! Highly recommended! This place is as good as it gets!

Useful 26 | Funny 19 | Cool 9

Dave K.
Palos Verdes Peninsula, CA
0 friends
15 reviews
2 photos

10/14/2020

This guy is the greatest. If you're a soft leftist cuck, you can eat another bag of dicks.

Useful 13 | Funny 13 | Cool 5

Dale D.
Dover, DE
11 friends
2 reviews

10/14/2020

In these very divisive times it's important to know what your consumer spending supports. If you believe it should go to a propaganda campaign to prop up the current "president", you found your match. If you however believe in the actual principles that Apple was founded upon likely best to look elsewhere. Personal choice is a core principle of our country, but lets at least know as much as we can about who/what our dollars are supporting.

Useful 16 | Funny 4 | Cool 1

45 other reviews that are not currently recommended

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in Notaries

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Our service portfolio includes Computer and Printer Support & Repair, Virus & Malware Removal, Data Protection & Recovery, Software Support with certified tech engineers available online as well as on-site upon request.Support... **read more**
in It Services & Computer Repair

People Also Viewed

Ask the Community

Yelp users haven't asked any questions yet about **The Mac Shop**.

Ask a Question

Recommended Reviews

Search within reviews

Sort by Yelp Sort

Start your review of **The Mac Shop**.

Jason M.
Gilbert, AZ
0 friends
6 reviews
4 photos

10/14/2020

As a person that has worked in IT for almost 30 years, my integrity is as important as my technical experience. I am trusted with highly sensitive data on a daily basis. My customers depend on their data being secure and trust me to make sure it isn't stolen or compromised. Only if I found something that was illegal or against company policy, would I turn it over, and I would only turn it over to the proper authorities. Hopefully, there is a lawsuit because this person should not be trusted with people's data.

Useful 79 | Funny 16 | Cool 6

RJ K.
Ebensburg, PA
4 friends
7 reviews
1 photo

10/14/2020

Owner was paid off by Trump cronies. Can you really trust this kind of place to handle your hardware?

Useful 69 | Funny 14 | Cool 4

Patrick D.
Phoenix, AZ
0 friends
9 reviews

10/14/2020

Owner invaded privacy by copying hard drive and turning it over to opposing party for political purposes. Don't trust this dude with your private data. Owner is Trump supporter who admits to copying Hunter Biden's hard drive and giving it to Rudy Giuliani. I don't care who you support--would you want your computer repair person copying your hard drive?

Useful 61 | Funny 13 | Cool 4

Kurt Z.
Arlington, VA
2 friends
4 reviews

10/14/2020

This guy makes copies of customer hard drive and and sells them to political operatives. I don't give a crap if you like Biden or not, what a violation or trust and privacy.

Useful 59 | Funny 8 | Cool 3

Jenn R.
Manchester, NH
9 friends
13 reviews

10/14/2020

Owner is on record with news agencies admitting he rifled through personal data that was not his, copied information, and gave that information to multiple people. You can't trust someone like that with your computer

Useful 56 | Funny 9 | Cool 2

Gina R.
Lamont, CA
1 friend
11 reviews
1 photo

10/14/2020

I like computer repair shops that I can trust. I do not know what Igor has stepped in, but it is smelling like he needs to bathe the stench off himself and do a better job as a human. Rudy did him no favors as now he will be scorned in all of society for getting involved in a sham situation.

Useful 51 | Funny 11 | Cool 2

Sally T.
Seattle, WA
0 friends
100 reviews

10/15/2020

Do not use this place. They have been known to spy on information in your computer and have guarantee no privacy. Watch out!

Useful 39 | Funny 5 | Cool 1

Ray M.
Brooklyn, NY
0 friends
15 reviews
1 photo

10/14/2020

I came to Mac Shop to have my laptop fixed after spilling liberal tears all over the keyboard. Great service in recovering the damaged laptop. Will come again

Useful 20 | Funny 22 | Cool 7

Luke G.
Davis, CA
497 friends
1 review

10/14/2020

They'll fix your computer & help us expose corrupt politicians like sleepy joe. Doesn't get much better than that.

Useful 20 | Funny 18 | Cool 7

Peter L.
Los Angeles, CA
47 friends
47 reviews
1 photo

10/14/2020

thedailybeast.com/man-wh...

Useful 23 | Funny 4 | Cool 1

D C.
SYLMAR, CA
0 friends
1 review

10/15/2020

Maybe the owner of the shop can locate Hillary's thousands of "accidentally" deleted emails. Also, maybe he could assist the FBI in helping them retrieve the "accidentally" forgotten phone passwords of all the crooked FBI agents involved in the Russian propaganda scam against the President and the USA. "Joey/Hunter/Barry, you've got some 'splaining to do!"

Useful 12 | Funny 22 | Cool 4

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Auto Tag Services read more

uBreakiFix
5
23.8 miles

Get your device diagnosed for free at uBreakiFix Glassb us a call on... read more

Ben W.
Atlanta, GA
0 friends
1 review

10/14/2020

The owner proudly makes copies of your hard drive without consent for blackmail purposes. Not even remotely trustworthy.

Useful 11 | Funny 3 | Cool 2

Kate H.
New York, NY
0 friends
8 reviews

10/15/2020

I should really give this place more than one star... because, allegedly (according to the NY Post article), you can drop off a water damaged laptop there for repairs without even putting a dime down as a deposit. Interesting. Every time I've brought my computer into an authorized Mac repair shop I've had to pay for both parts and labor upfront...then signed a form with my name and credit card info in case more parts were needed. It seems that the way THIS man supposedly runs his shop is "I don't know you, I don't know your name, I don't need to know your name, I give you no receipt with your name on it for pick up or keep a duplicate receipt attacked to your laptop and I don't need any form of payment given before doing hundreds of dollars of work for you." Very odd business model, no? Or, at least an awkward business model if you're desperately trying to frame a presidential candidate. Good luck with that...you just trashed your own small business!

Useful 11 | Funny 4 | Cool 2

Jen Z.
Bear, DE
21 friends
8 reviews

2/17/2020

I have made numerous mistakes with my Mac, including downloading malware and pushing an old MacBook Pro beyond it's limits. John Paul has always patiently helped me and gotten me back into usable states quickly and efficiently. Thank you for your help!

Useful 12 | Funny 1 | Cool 2

Ryan E.
Wilmington, DE
81 friends
116 reviews
3 photos

8/8/2019

I bought a new iMac almost two years ago, but I was stupid enough not to spend the few extra bucks on the things that would've made the machine actually function the way I wanted it to, so after almost a year of screaming at a computer with a FACTORY INSTALLED 5400rpm HD and a whole 8 GB of RAM (though YES I ADMIT THIS WAS MY FAULT SHUT THE F UP), enough was enough.

Admittedly the biggest reason I dragged my feet on getting this mostly-except-not-really satisfactory machine upgraded was money, and time/convenience was a distant second. But I found the components I needed on Newegg--a SSD and a new pair of RAM modules that would kick me up to 16 GB. Both the drive and the memory were highly rated (Yelpers rejoice!)... but even after getting the components I needed, I dawdled on the upgrade. I can't exactly explain why... though maybe it had to do with realizing I'd spent nearly $300 on computer components that were sitting in a box in my closet.

I was a-feared' to cut open my iMac and try and make it better (bless its heart). Lucky for me (AND YOU!!!), though, there's a bonafide Apple GUY here in Wilmington that I am so happy to now know about.

First clue I knew I was going to get good service: Response to my email inquiry within hours--August 2019, for those who didn't bother to check the review date.

Second clue: The guy has been in the (admittedly somewhat decrepit) Trolley Square shopping center/thing/place for ages. Don't let it throw you. Longevity is a VERY good trait in a Mac person, coming from someone who dated a Mac tech and who still has dozens of Mac tech friends.

I have nothing more to say than WOW.

I am one TRILLION percent satisfied. I'm writing this review right now, BTW, on the very machine I brought in for the upgrade. The difference is like night and day. And while I know that The Mac Shop isn't "responsible" for the difference... they really kind of are.

Useful 10 | Funny 1 | Cool 2

Nathan P.
Wilmington, DE
0 friends
3 reviews

1/15/2020

Great service. Great advice. Updated my MacBook software free of charge. Would recommend anyone goes here before suffering at the apple store.

Useful | Funny | Cool

Michael M.
Wilmington, DE
0 friends
23 reviews
3 photos

12/3/2019

I brought my "vintage " iMac in to get formatted so I could give it to my grandson. He scanned it for damage prior to formatting the hard drive. After that he even gave me more memory. After doing an awesome job I asked how much I owed him. He tells me "nothing". If I ever have an Apple problem, he's my man.

Useful | Funny | Cool

T S.
Philadelphia, PA
16 friends
18 reviews
6 photos

4/26/2018

I got to the store right around John Paul's lunch break, he was walking out but was nice enough to check my laptop anyway. It feels like the world stops when your Mac fails to work properly and he knew right away my two options for repair, which seemed basic to him. My only wish was to not have to buy a new one. Not only it was ready the next day, it ran faster and he managed to save my files! He is the best!

Useful 6 | Funny 1 | Cool 2

Jordan B.
Wilmington, DE
182 friends
4 reviews

10/31/2017

Had the best experience here. Very professional and helpful in explaining what had happened to my computer. After 8 years my MacBook Pro crashed. I took it to apple who was gonna charge me with $2,500 for a possible fix. A friend recommended this shop and I spent under a hundred to get the problem fixed. Will definitely be coming back here.

Useful 9 | Funny 1 | Cool 2

Emily B.
New York, NY
0 friends
7 reviews
2 photos

10/6/2017

The Mac Shop is the place for all your Apple needs! John Paul fixed my old computer up so that it works better than even when it was brand new. He was quick and professional and the place has a great feel to it. Definitely say YES to The Mac Shop. :)

Useful 7 | Funny 1 | Cool 2

Ask the Community

Yelp users haven't asked any questions yet about **The Mac Shop**.

Ask a Question

Recommended Reviews

Search within reviews

Sort by Yelp Sort

Start your review of **The Mac Shop**.

D O.
Wilmington, DE
0 friends
12 reviews

3/31/2017

OMG! This business is amazing! I thought my 9 year old Macbook Pro was ready for retirement. I really did not want to spend another $1200 to replace it. MY old girl was too slow to run basic internet stuff and the beachball dance was all she had left. How sad! I read about doing some diy upgrades but I was not about to figure that out. Mac Store (JP) upgraded her memory and loaded EL Capitan on my old friend and now she is running like she is brand new!! $180 and I had it back the next day!!!!! What???? Amazing. This Small Business makes me want to support other small businesses. Wow

Useful 9 | Funny 1 | Cool 2

Heather K.
Wilmington, DE
0 friends
2 reviews

12/15/2017

Highly recommend! My MacBook Air wouldn't charge and he took the time to troubleshoot the issue (staple stuck in the charging port) then run diagnostics on my laptop to ensure it was fully charging and functional. He would not accept any payment. I will definitely be back for him to do a tune-up.

Useful | Funny | Cool

Valarie W.
New Castle, DE
145 friends
35 reviews
10 photos

2/6/2014

A hidden gem! JP is knowledgeable, efficient, reasonable and just a nice guy! My MAC is now up and running like a NEW MAC with everything in place and ready to roll. He heard me talking about how my MAC goes everywhere with me, and suggested I might want to consider a solid state hard drive, along with an apology as he doesn't like to upsell. But he's right! My MAC goes to work, on the plane, at home, you name it. AND I have burned out 3 regular hard drives because I sometimes don't let it get fully into "snooze". I'm think I'm going to love the solid state hard drive.

Also, he does one on one's for $39.95. I think I am going to take him up on it in the future as I think I am underutilizing the power of my MAC.

THANK YOU!!!

Useful 12 | Funny 1 | Cool 2

D Z.
Warminster, PA
0 friends
26 reviews
14 photos

6/11/2017

Great and friendly service. Needed to service an older macbook pro, the apple store turned me away, but the Mac Shop was up to the task. 24 hrs after I dropped the old mac off, I picked up a functioning mac. Thanks.

Useful 8 | Funny 1 | Cool 2

Roger T.
Manhattan, NY
0 friends
4 reviews
13 photos

2/16/2017

JP is a rare combination of generosity, honesty and knowledge. He helped me with an unusual problem and saved me a ton of money. I came in near tears because my computer fell in water (and no, Im NOT giving details of that), and I left thinking how lucky I was to have come to The Mac Shop first. He seems like a mad scientist the way he casually goes from machine to machine and easily comes up with answers and practical solutions. A rare gem. Don't hesitate to use this store!

Useful 9 | Funny 3 | Cool 2

Damian M.
Wilmington, DE
93 friends
7 reviews
3 photos

6/20/2014

John Paul is THE MAN when it comes to Mac. I am in a position to bring him many Macs for repair and let me tell you I have never been disappointed once. Always very friendly and courteous. I have seen him go above and beyond for his customers and he usually knows what's wrong in minutes of having it in his hands! Don't trust anyone else with your Mac!

Useful 11 | Funny | Cool 2

KP R.
Philadelphia, PA
24 friends
123 reviews
13 photos

3/13/2014

This place is everything the other reviews said it was. I was tired of going to the mall or making an appointments for days later with the "geniuses" at the Apple Stores. JP definitely knows about Apple products and will be very upfront and informative with you. I just did a simple RAM upgrade for my Macbook Pro but watching him work on 3-4 machines at one time was quiet impressive. He will give you the 1 on 1 time and answer any questions you could have. He also wears cool hats. ha. Will definitely come here anytime i have an issue

Useful 8 | Funny | Cool 3

Chris M.
Newark, DE
0 friends
17 reviews
1 photo

10/30/2015

My 2009 Mac harddrive died. Apple store no longer services this old model and recommended The Mac Shoppe. How fortunate I was. Whereas Apple said they would not convert it into a fusion drive, John Paul did without a problem. Now have my old Mac humming faster than ever. John Paul will have my repeat business.

Useful 8 | Funny | Cool 2

Zachary W.
Wilmington, DE
0 friends
1 review

3/30/2015

This was one of the best customer service experiences I've ever had. John Paul is extremely friendly and within minutes of me being there was able to diagnose and fix my problem without any BS or attempts to sell me on anything that wasn't needed. I will definitely be back if I have any more issues with our macs.

Useful 1 | Funny | Cool

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5
23.8 miles

Get your device diagnosed for free at uBreakiFix Glassb us a call on... read more

Ben d.
Rockland, DE
18 friends
4 reviews
7 photos

9/8/2012
First to Review

This shop is an oasis in the wilderness of expensive computer repair. To say they just fix Mac's is an understatement - they fix them quickly, at a very low cost - in the process one gets an education in all things Mac. This shop is to Mac repair, what Steve Jobs is to Mac design. I highly recommend these guys.

Useful 9 | Funny | Cool 2

Dustin S.
Starmount, Charlotte, NC
0 friends
1 review

2/27/2014
What great Mac repair shop. My hard drive went on a 6 year old mac book, JP replaced it with a 500GB HD and transferred my data from a external HD. I now basically have a new computer that runs fanatically for a fraction of the price. Excellent shop. All this was same day service.

Useful 8 | Funny | Cool 2

< 1 2 3

45 other reviews that are not currently recommended

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In Notaries

Support Nerds

Our service portfolio includes Computer and Printer Support & Repair, Virus & Malware Removal, Data Protection & Recovery, Software Support with certified tech engineers available online as well as on-site upon request.Support... **read more**
In It Services & Computer Repair

People Also Viewed

Xfinity Store by Comcast
5
Internet Service Providers, Telecommunications, Television Service Providers

Staples
10
Shipping Centers, Printing Services, Mobile Phone Repair

EFiled: Oct 17 2022 03:57PM EDT
Transaction ID 68264385
Case No. S22C-10-012 CAK

EXHIBIT L

From: [redacted]
Subject: D sappo nt ng
Date: October 22, 2020 at 3:50 PM
To: John Pau Mac Isaac mac saac@demacshop.com

I was a loyal customer who will never come back. How could you do this?

Suzanne

[redacted]
Subject: Eat sh t and d e SLOWLY fuck ng Russ an stooge
Date: October 15, 2020 at 2:41 PM
To: nfo@demacshop.com

From: [redacted]
Subject: Fear & Bu
Date: October 15, 2020 at 2:14 AM
To: nfo@demacshop.com

You can stop with all the melodrama. No one's going to murder you...mainly because you don't know anything. You have no copy of anyone's hard drive, and if you do, you're going to jail for theft of private property. Didn't your "lifesaver" Rudy clue you into that? No? Bummer. Did he tell you that your business is done for? No? Bummer again. Got any employee's? Yeah...THEIR lives are now ruined as well. Yet another narrow-minded, low info, low IQ idiot who believes EVERYTHING THEY READ on Facebook & worships the Que-A-Moron slide towards complete & total ignorance & stupidity. No common sense..and no critical thinking skills. Just one more garden-variety Trump-Stooge who just threw away their normal lives for a chance to lick Fat Donnie's scrotum and bask in the orange glow of a maniac.

Wouldn't it have been easier to just shoot-up a pizza joint?

Good-luck with all that, Dipshit.

From: [redacted]
Subject: Foo sh
Date: October 25, 2020 at 2:31 PM
To: nfo@demacshop.com

If t ever got hard dr ves n damaged aptops that were p cked up at my shop.... I wou dnt go mak ng cop es of the r hard dr ves and then d g nto them w th b atant d sregard for customer pr vacy. You ve c ear y been p ayed and used by the FSB as an easy mark. You re so far up your own ass you probab y cant see t. You just stumb ed across a th s mater a what a joke. Anyone w th ha f a bra n can see th s for what t s. I dont ke B den, but good God how can you support a fuck ng psycho n office who es ke ts breath ng. Fuck ng nsaaannnneeeeeee

From: John Paul Mac Isaac
To: Brian Della Rocca
Subject: Fwd: Better get out of town asshole
Date: Thursday, December 17, 2020 10:01:27 AM

Sent from my iPhone

Begin forwarded message:

From: John Paul Mac Isaac [redacted]
Date: December 7, 2020 at 3:50:13 PM MST
To: [redacted]cj.state.de.us
Subject: Fwd: Better get out of town asshole

Begin forwarded message:

From: Anonymousemail <noreply@anonymousemail.me>
Subject: Better get out of town asshole
Date: November 24, 2020 at 6:39:08 PM MST
To: info@demacshop.com

This email was sent via **anonymousemail**
To remove this signature and unlock all features go premium
→ New! Join our affiliate program and start **earning money**.

Soon they will be playing the bagpipes for you asshole soon Like trump

Keep moving and looking over your shoulder buttfuck

From: [redacted]
Subject: Hard Dr ve
Date: October 25, 2020 at 1:27 AM
To: nfo@demacshop.com

So, how many customers do you think will now do business with a company that copied a customers hard drive and sold the contents to the highest bidder.
Talk about un-ethical. You're a real spice of shit.

Shirley [redacted]

From: [redacted]
Subject: Haven't A ways been a moron
Date: October 15, 2020 at 8:31 AM
To: nfo@demacshop.com

John Pau ,
What happened to you, you used to have some semb ance of nte gence. You have gone down a rabb t ho e that s go ng to destroy your bus ness, reputat on and fe. A n the name of a rac st, Misogynist, moronic asshat.
Mike [redacted]

Sent from my Phone

From: [redacted]
Subject: LOW LIFE
Date: October 15, 2020 at 12:18 PM
To: nfo@demacshop.com

That is about as low as you can go.
I will spend my next few years thinking how AWFUL John Paul Mac Isaac is!

what a low life.

I hope you lose your business. You are unethical.

Disgusted.
Rupert [redacted]

From: [redacted]
Subject: Mac Shop
Date: October 21, 2020 at 5:42 PM
To: nfo@demacshop.com

Just ost my bus ness, and I w be sure to spread the word on soc a med a about your mpropr ety. You shou d be ashamed of yourse f.

Sent w th ProtonMa Secure Ema .

From: [redacted]
Subject: Repa r
Date: October 21, 2020 at 2:59 PM
To: nfo@demacshop.com

How does a b nd p ece of sh t boot cker repa r computers?

From: [redacted]
Subject: STOLEN LAPTOPS
Date: October 15, 2020 at 5:40 PM
To: nfo@demacshop.com

It's obv ous you cannot be trusted w th the contents of your customer's aptops. You can be sure that a of the B den's supporters, fam y and fr ends, wh ch s a most everyone n De aware w no onger be do ng bus ness w th you.

I mag ne you' be bankrupt and out of bus ness short y. Good r ddance.

From: [redacted]
Subject: unconsc onab e
Date: October 15, 2020 at 8:09 AM
To: nfo@demacshop.com

W never go to your shop aga n.

From: [redacted]
Subject: URGENT: E ect on Interference
Date: October 15, 2020 at 5:44 AM
To: nfo@demacshop.com

Teamed-up w th G u an and Russ a to nterfere n the most consequent a e ect on of our t me, eh?

You are a scumbag and tra tor

A you' now know s a rea ty co oured by that truth. The same w sure y be made true of your fam y. Noth ng w be the same aga n

Act ons have consequences, as you're about to earn

I wou d not be you r ght now for a m on bucks

- Fate

CERTIFICATE OF SERVICE

I certify that on March 7, 2023, I served the attached document by U.S. Mail and electronic mail as follows:

Ronald G. Poliquin
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/s/ Stephen R. Terrell
STEPHEN R. TERRELL

JS 44 (Rev. 09/19)

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

JOHN PAUL MAC ISAAC

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

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

Ronald G. Poliquin, The Poliquin Firm LLC, 1475 S. Governors Ave., Dover, DE 19904 (302) 702-5501

DEFENDANTS

CABLE NEWS NETWORK, INC.; ADAM BENNETT SCHIFF; POLITICO, LLC; ROBERT HUNTER BIDEN; BFPCC, INC.

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

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

Attorneys *(If Known)*

Stephen R. Terrell, United States Department of Justice, Civil Division, Torts Branch, P.O. Box 888, Washington, DC 20044, (202) 353-1651

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

- ❒ 1 U.S. Government Plaintiff
- ❒ 3 Federal Question *(U.S. Government Not a Party)*
- ☒ 2 U.S. Government Defendant
- ❒ 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)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	❒ 1	❒ 1	Incorporated *or* Principal Place of Business In This State	❒ 4	❒ 4
Citizen of Another State	❒ 2	❒ 2	Incorporated *and* Principal Place of Business In Another State	❒ 5	❒ 5
Citizen or Subject of a Foreign Country	❒ 3	❒ 3	Foreign Nation	❒ 6	❒ 6

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

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ❒ 110 Insurance
- ❒ 120 Marine
- ❒ 130 Miller Act
- ❒ 140 Negotiable Instrument
- ❒ 150 Recovery of Overpayment & Enforcement of Judgment
- ❒ 151 Medicare Act
- ❒ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ❒ 153 Recovery of Overpayment of Veteran's Benefits
- ❒ 160 Stockholders' Suits
- ❒ 190 Other Contract
- ❒ 195 Contract Product Liability
- ❒ 196 Franchise

REAL PROPERTY
- ❒ 210 Land Condemnation
- ❒ 220 Foreclosure
- ❒ 230 Rent Lease & Ejectment
- ❒ 240 Torts to Land
- ❒ 245 Tort Product Liability
- ❒ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ❒ 310 Airplane
- ❒ 315 Airplane Product Liability
- ☒ 320 Assault, Libel & Slander
- ❒ 330 Federal Employers' Liability
- ❒ 340 Marine
- ❒ 345 Marine Product Liability
- ❒ 350 Motor Vehicle
- ❒ 355 Motor Vehicle Product Liability
- ❒ 360 Other Personal Injury
- ❒ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ❒ 365 Personal Injury - Product Liability
- ❒ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ❒ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ❒ 370 Other Fraud
- ❒ 371 Truth in Lending
- ❒ 380 Other Personal Property Damage
- ❒ 385 Property Damage Product Liability

CIVIL RIGHTS
- ❒ 440 Other Civil Rights
- ❒ 441 Voting
- ❒ 442 Employment
- ❒ 443 Housing/ Accommodations
- ❒ 445 Amer. w/Disabilities - Employment
- ❒ 446 Amer. w/Disabilities - Other
- ❒ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ❒ 463 Alien Detainee
- ❒ 510 Motions to Vacate Sentence
- ❒ 530 General
- ❒ 535 Death Penalty

Other:
- ❒ 540 Mandamus & Other
- ❒ 550 Civil Rights
- ❒ 555 Prison Condition
- ❒ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ❒ 625 Drug Related Seizure of Property 21 USC 881
- ❒ 690 Other

LABOR
- ❒ 710 Fair Labor Standards Act
- ❒ 720 Labor/Management Relations
- ❒ 740 Railway Labor Act
- ❒ 751 Family and Medical Leave Act
- ❒ 790 Other Labor Litigation
- ❒ 791 Employee Retirement Income Security Act

IMMIGRATION
- ❒ 462 Naturalization Application
- ❒ 465 Other Immigration Actions

BANKRUPTCY
- ❒ 422 Appeal 28 USC 158
- ❒ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ❒ 820 Copyrights
- ❒ 830 Patent
- ❒ 835 Patent - Abbreviated New Drug Application
- ❒ 840 Trademark

SOCIAL SECURITY
- ❒ 861 HIA (1395ff)
- ❒ 862 Black Lung (923)
- ❒ 863 DIWC/DIWW (405(g))
- ❒ 864 SSID Title XVI
- ❒ 865 RSI (405(g))

FEDERAL TAX SUITS
- ❒ 870 Taxes (U.S. Plaintiff or Defendant)
- ❒ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ❒ 375 False Claims Act
- ❒ 376 Qui Tam (31 USC 3729(a))
- ❒ 400 State Reapportionment
- ❒ 410 Antitrust
- ❒ 430 Banks and Banking
- ❒ 450 Commerce
- ❒ 460 Deportation
- ❒ 470 Racketeer Influenced and Corrupt Organizations
- ❒ 480 Consumer Credit (15 USC 1681 or 1692)
- ❒ 485 Telephone Consumer Protection Act
- ❒ 490 Cable/Sat TV
- ❒ 850 Securities/Commodities/ Exchange
- ❒ 890 Other Statutory Actions
- ❒ 891 Agricultural Acts
- ❒ 893 Environmental Matters
- ❒ 895 Freedom of Information Act
- ❒ 896 Arbitration
- ❒ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ❒ 950 Constitutionality of State Statutes

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. 2679

Brief description of cause:
Federal Tort Claims Act claim for defamation, civil conspiracy to commit defamation, aiding and abetting defamation

VII. REQUESTED IN COMPLAINT:

❒ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ 1,500,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ❒ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 03/07/2023

SIGNATURE OF ATTORNEY OF RECORD /s/ Stephen R. Terrell

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

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 statue.

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 pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

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