



**CIRCUIT COURT FOR BALTIMORE COUNTY,
MARYLAND**

401 Bosley Avenue, P.O. Box 6754
Towson, MD 21285-6754

Main: 410-887-2601
Fax: 410-887-3062

To: CANDACE OWENS



Case Number:

C-03-CV-21-002361

Other Reference Number(s):

Child Support Enforcement Number:

KIMBERLY KLACIK VS. CANDACE OWENS

Issue Date: 7/22/2021

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this court, to the attached complaint filed by:

KIMBERLY KLACIK



This summons is effective for service only if served within 60 days after the date it is issued.

Julie L. Ensor
Clerk of the Circuit Court

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

Instructions for Service:

1. This summons is effective for service only if served within 60 days after the date issued. If it is not served within the 60 days, the plaintiff must send a written request to have it renewed.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Maryland Rule 2-126.
4. If this notice is served by private process, process server shall file a separate affidavit as required by Maryland Rule 2-126(a).

SHERIFF'S RETURN
(please print)

To: CANDACE OWENS

_____ ID# _____ of the _____
Serving Sheriff's Name

County Sheriff's office present to the court that I:

(1) Served _____
Name of person served

on _____ at _____
Date of service Location of service

_____ by _____ with the following:
Manner of service

- | | |
|--|---|
| <input type="checkbox"/> Summons | <input type="checkbox"/> Counter-Complaint |
| <input type="checkbox"/> Complaint | <input type="checkbox"/> Domestic Case Information Report |
| <input type="checkbox"/> Motions | <input type="checkbox"/> Financial Statement |
| <input type="checkbox"/> Petition and Show Cause Order | <input type="checkbox"/> Interrogatories |
| <input type="checkbox"/> Other _____ | |
- Please specify

(2) Was unable to serve because:

- | | |
|---|--|
| <input type="checkbox"/> Moved left no forwarding address | <input type="checkbox"/> No such address |
| <input type="checkbox"/> Address not in jurisdiction | <input type="checkbox"/> Other _____ |

Please specify

Sheriff fee: \$ _____ waived by _____

_____ Date Signature of serving Sheriff

Instructions to Sheriff's Office or Private Process Server:

1. This Summons is effective for service only if served within 60 days after the date issued. If it is not served within 60 days, the plaintiff must send a written request to have it renewed.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Rule 2-126.
4. If this summons is served by private process, process server shall file a separate affidavit as required by Rule 2-126(a).

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY, MARYLAND

KIMBERLY KLACIK

[REDACTED]

Plaintiff.

v.

CANDACE OWENS

[REDACTED]

Defendant.

C-03-CV-21-002361

Civil Action No. _____

Jury Demanded

COMPLAINT AND DEMAND FOR JURY TRIAL

1. Defendant Candace Owens admits that (1) she is “not an investigative journalist;” (2) the allegations she made were “talking about a federal crime;” (3) she “had no proof,” “cannot possibly verify” and “could not confirm” information she presented as fact; and (4) “the only reason [Defendant] started this was because of what started as a petty Twitter feud.” Defendant’s admissions attendant to Defendant’s publication of false and defamatory statements alleging that Plaintiff Kimberly Klacik engaged in criminal activity establish the foundation of Ms. Klacik’s defamation claim against Defendant.

2. Defendant, motivated by this self-proclaimed “petty Twitter feud” with Ms. Klacik, conducted a four-day defamatory smear campaign against Ms. Klacik that Defendant maliciously portrayed as an “investigation” and published a video of Defendant’s purported “findings,” including allegations of criminal activity against Ms. Klacik, to Defendant’s personal

social media accounts. Specifically, Defendant affirmatively accused Ms. Klacik of tax fraud, campaign fraud, money laundering, illegal drug use, and acting as a “madame.” There was no truth to the allegations.

3. In making these allegations of criminal activity, Defendant claimed to have received information from someone who “stripped with [Ms. Klacik]” and who allegedly told Defendant that Ms. Klacik used campaign funds to purchase cocaine and scammed people of millions. These caustic and made-up defamatory allegations are without factual support.

4. Defendant published these defamatory statements through Defendant’s personal social media accounts in a concerted effort to maximize dissemination to cause severe damage and significant harm to Ms. Klacik’s professional and personal reputation.

5. Defendant’s allegations against Ms. Klacik of criminal activity are false. As Ms. Klacik stated multiple times, Ms. Klacik did not misuse campaign funds, let alone for drug or any other illicit activity, engage in money laundering, commit tax or campaign fraud, or act as a “madame.” Ms. Klacik not only denied publicly Defendant’s accusations of criminal conduct on Ms. Klacik’s personal social media channels, but Ms. Klacik also sent Defendant multiple letters notifying the Defendant that her statements were false.

6. Despite repeatedly being notified of the falsity of her statements, Defendant refused to remove the defamatory video. As of filing this Complaint, Defendant has yet to remove the video and continues to support and encourage the harassment of Ms. Klacik by other individuals who embrace Defendant’s defamatory statements.

7. Defendant’s tortious conduct caused and continues to cause substantial injury to Ms. Klacik’s reputation and professional and personal relationships. Ms. Klacik has lost and continues to lose financial opportunities, media appearances, and political support as a direct

result of the Defendant's malicious and wanton statements. Examples of such lost opportunities include the cancellation of a book deal, losing the sponsorship of a nationally-recognized media vendor, cancelled fundraisers, and lost support of previous political donors. Ms. Klacik and her family continue to be harassed daily, with Ms. Klacik specifically receiving harmful and degrading comments because of the defamatory claims made by the Defendant.

8. Defendant has defamed and injured Ms. Klacik; accordingly, Ms. Klacik initiates this action to vindicate her rights under civil law and seek compensatory and punitive damages as a result of Defendant's conduct.

PARTIES

9. Plaintiff Kimberly Klacik is a businesswoman and the former Republican nominee for the Seventh (7th) Congressional District. Ms. Klacik is also the current President of Red Renaissance, Inc., a non-connected political action committee registered with the Federal Election Commission that supports federal candidates who embrace and espouse freedom of speech, revitalization of urban areas, economic empowerment, family planning, increased police funding, and women and minority leadership. Ms. Klacik is domiciled in Baltimore County, State of Maryland.

10. Defendant Candace Owens is a nationally recognized author, talk-show host, political commentator, and social media personality. Defendant is domiciled in the State of Tennessee.

JURISDICTION AND VENUE

11. This Court has personal jurisdiction over Defendants pursuant to Md. Code, Courts and Judicial Proc., §§ 6-102, and 6-103(b)(1), (3), and (4).

12. This Court has subject matter jurisdiction over this matter pursuant to Md. Code, Courts & Judicial Proc. § 1-501.

13. Venue is proper in this Court pursuant to Md. Code, Courts and Judicial Proc., §§ 6-201(a), (b), and 6-202(3), (8), (11).

STATEMENTS OF FACT

14. Ms. Klacik is a resident of and a long-time advocate for the City of Baltimore. Her passion for Baltimore and her desire to make the City better motivated her to run for Maryland's Seventh Congressional District, and turned her Congressional campaign into a multi-million dollar race. Ms. Klacik now uses her platform as a former Congressional candidate to help champion the African American community by supporting African American political candidates in state and federal races across the country.

15. Defendant is a high profile conservative talking head who is notorious for outrageous and controversial statements, such as "white supremacy and white nationalism is not a problem that is harming Black America."¹

16. Defendant has a large social media following, including 3,901,305 Instagram followers,² 5,162,249 Facebook subscribers,³ and 2,748,857 Twitter followers,⁴ with the number of followers across all social media accounts consistently increasing.

¹ U.S. House Oversight Joint Subcommittee Hearing, 116th Cong. (Sep. 20, 2019)(statement of Candace Owens).

² Candace Owens (@realcandaceowens), Instagram, <https://www.instagram.com/realcandaceowens/?hl=en> (last visited July 13, 2021).

³ Candace Owens (@realCandaceOwens), Facebook, <https://www.facebook.com/realCandaceOwens/> (last visited July 13, 2021).

⁴ Candace Owens (@RealCandaceO), Twitter, https://twitter.com/RealCandaceO?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor (last visited July 13, 2021).

17. Juneteenth is a holiday celebrating the end of slavery in the United States. It is a significant day in American history, with many scholars classifying Juneteenth as the United States' second independence day.⁵ On June 18, 2021, President Joseph Biden declared Juneteenth a federal holiday.

18. On June 18, 2021, Defendant launched a series a posts from her personal Twitter account assailing President Biden for declaring Juneteenth a federal holiday. In one of those posts, Defendant stated, "Sometimes I wonder when (if ever) Black America will wake up to the psychological warfare and perpetual brainwash to believe everything is racist."

19. Ms. Klacik replied on her personal Twitter account to Defendant's post, stating, "Believe it or not, many in 'Black America' are very aware the fight is about classism rather [than] racism. Unfortunately, the loudest mouths with the largest platforms represent the majority. This might come to a shock to you because of your lack of engagement with black people."⁶

20. On June 20, 2021, Ms. Klacik replied to several individuals on Ms. Klacik's Instagram account who asked Ms. Klacik about the "Candace Owens situation." Ms. Klacik stated that she was invited to appear on *Candace*, the Defendant's podcast; however, Ms. Klacik declined the invitation stating "the show can be edited because it is streamed online." Ms. Klacik added, "I don't normally let people profit off of a conversation with me."⁷

21. On June 21, 2021, Defendant responded to Ms. Klacik's comments, accusing Ms. Klacik of not being authentic and disabling comments on Ms. Klacik's own social media

⁵ National Museum of African American History & Culture, *The Historical Legacy of Juneteenth*, (last visited July 19, 2021), <https://nmaahc.si.edu/blog-post/historical-legacy-juneteenth>.

⁶ Since the Twitter post no longer is available on Twitter, the referenced information is sourced from the article cited as: James Crump, *Candace Owens vs. Kimberly Klacik—Why the Two Black Female Conservatives Are Feuding*, NEWSWEEK (June 22, 2021).

⁷ *Id.*

account, stating “LOL to you, disabling comments on your last post. You are such a fake and hilarious person to keep trying to denigrate the Dailywire as a ‘computer show.’ Computer shows—meaning digital, podcasts, youtubers, etc.—have a larger reach than cable news, which I also go onto. Again, you are doing nothing here but exposing yourself.”⁸

22. On the same day, Defendant posted a series of videos to her personal Instagram account via “Instagram Stories,” stating “Kim wants clout, Candace wants change.” The Defendant then stated that Ms. Klacik blocked Defendant from social media.⁹

23. In the same series of Instagram Stories, as republished in *Newsweek*, Defendant teased to her almost 4,000,000 Instagram followers that she had discovered some “incredible” information about Ms. Klacik that will “blow your minds.” Defendant also claimed that Defendant could not cover the information on her podcast, because Defendant needed to “unpack everything” and make sure every piece of information was verified.¹⁰ Instead of verify, Defendant chose to vilify.

24. On June 22, 2021, the Defendant published a live video on Defendant’s Instagram and Facebook accounts. A true and correct Transcript of the video is attached to the Complaint as Exhibit 1. The duration of the video, www.instagram.com/p/CQcQ-oEpM-V/, is 44:05 (“the Video”). The Video has since been republished on social media platforms, including on YouTube, by individuals who, upon information and belief, have personal relationships with the Defendant.¹¹

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ See, e.g. The Officer Tatum, *Candace Owens EXPOSED FAILED CANDIDATE Kimberly Klacik*, YOUTUBE (June 21, 2021); Tatum Clips, *Kimberly Klacik EXPOSED by Candace Owens*, YOUTUBE (June 23, 2021). The Officer Tatum has around 1.66 million subscribers, and his video on this subject had 362,043 views. Tatum Clips has around 16,700 subscribers and his video has 5,454 views.

25. In the Video, the Defendant affirmatively accuses Ms. Klacik of engaging in criminal activity. Specifically, Defendant made bald untrue allegations that include Ms. Klacik “used campaign money to do cocaine,” participated in “money laundering, tax fraud, and campaign fraud,” paid vendors in order to “move money off the books,” “was the person who helped bring a lot of strippers” into a strip club that Defendant alleges was owned by Ms. Klacik’s estranged husband, was a “madame of that strip club,” and “has been scamming people for millions.” (“Criminal Allegations”).

26. Defendant, when making the Criminal Allegations, acknowledged the accusations were regarding “federal crimes,” would “paint [Ms. Klacik] in the wrong light,” and Defendant’s investigation into Ms. Klacik was motivated by a “petty Twitter feud” between Defendant and Ms. Klacik.

27. Defendant publicized the Criminal Allegations without factual support. Defendant’s main evidence for the Criminal Allegations purportedly came from “a stripper who used to work with [Ms. Klacik]” and who supposedly told Defendant that *some* of the Criminal Allegations were true.

28. Defendant also admitted that she “had no proof,” “cannot possibly verify” and “could not confirm” the Criminal Allegations. Nevertheless, Defendant continued to publish and republish as fact that Ms. Klacik engaged in criminal activity and that Defendant’s “investigation” supported these claims.

29. The Criminal Allegations that Defendant made against Ms. Klacik are false and defamatory. Defendant claims Ms. Klacik was “madame” of a Baltimore strip club. Ms. Klacik never was a “madame.” Defendant claims Ms. Klacik used “campaign funds to do cocaine.” Ms. Klacik never used campaign funds for any illegal activity, let alone for drug use. Defendant

claims Ms. Klacik committed “campaign fraud,” “tax fraud,” and “money laundering,” by making payments to “sketchy” businesses. Ms. Klacik never committed campaign fraud, tax fraud, or money laundering. Kim Klacik for Congress (“the Campaign”) is a legal entity for which Ms. Klacik never even had access to its bank account. Ms. Klacik did not make any payments on behalf of the Campaign to any individual or business entity. The only person with access to the Campaign’s bank account during the campaign was the Campaign’s Treasurer. Payments that the Treasurer made by and for the Campaign were for permissible campaign expenditures pursuant to the terms of legally binding contracts and obligations.

30. Ms. Klacik repeatedly denied the Criminal Allegations on Ms. Klacik’s social media accounts and on television appearances. On June 23, 2021, Ms. Klacik released a statement on Twitter regarding the Criminal Allegations stating that Defendant’s allegations were “offensive, false, and defamatory.”¹² Ms. Klacik subsequently posted an additional statement on Twitter on June 24, 2021, stating that Defendant “falsely accused [Ms. Klacik], private citizens and businesses of federal crimes.”¹³ Exhibits 2 and 3. Ms. Klacik also appeared on The Armstrong Williams Show on June 25, 2021 where Ms. Klacik denied the Criminal Allegations.¹⁴ Ms. Klacik later posted a video to her personal YouTube account further denying the Criminal Allegations (“the Response Video”).¹⁵ A true and accurate Transcript of the Armstrong Williams Interview and the Response Video is attached as Exhibit 4.

31. On June 24, 2021, Counsel for Ms. Klacik sent a Cease and Desist Letter to Defendant, notifying Defendant that the Criminal Allegations were false and defamatory, and

¹² Kimberly Klacik (@kimKBaltimore), Twitter (June 23, 2021).

¹³ *Id.* (June 24, 2021).

¹⁴ Armstrong Williams, *Kimberly Klacik responds to Candace Owens allegations*, YOUTUBE (June 25, 2021).

¹⁵ Kimberly Klacik, *Answering False Accusations, Last Time I Address It*, YOUTUBE (June 26, 2021).

requesting that Defendant immediately remove the Video from her social media platforms (“the Cease and Desist Letter”). Exhibit 5.

32. Later that day, Defendant responded to Counsel for Ms. Klacik via electronic mail, stating that “nothing [Defendant] said in [her] video constitute[d] defamation of character,” “[a]ll facts [she] made are backed by truth,” and that Defendant had “EVERY right under the law to inquire about campaign finances” (emphasis in original). Exhibit 7.

33. On June 25, 2021, in response to Defendant’s e-mail, Counsel for Ms. Klacik sent an additional letter to Defendant and Defendant’s attorney reiterating that the Criminal Allegations were false and that all legal options would be explored in the event the Video is not removed from social media platforms (“Attorney Demand”). Exhibit 6.

34. Defendant, dismissive of the opportunities to recant or take down the defamatory Video made and disseminated with actual malice, responded to the Attorney Demand, stating, “I will not be removing any of the videos. I already told you that[,]” and Defendant concluded her email reply stating, “Let me reiterate—I will not removing any of the videos.” Exhibit 7.

35. As of filing this Complaint, Defendant has refused to remove the Video from her social media accounts. Defendant also has not published Ms. Klacik’s multiple denials to Defendant’s social media followers, despite stating, “[a]nd by the way, if anything has been debunked, if she’s like going to come out and be like, oh no, I know I gave to this business that doesn’t really exist, but this is why, I will add that because I’m not trying to, you know, paint her in the wrong light.”

36. Despite Defendant’s knowledge of the falsity and the defamatory nature of her claims and disingenuous claim not to paint Ms. Klacik in the wrong light, Defendant continues to perpetuate the false and defamatory statements that Defendant concocted and published. When

Defendant's countless supporters harass Ms. Klacik or repeat the false and defamatory statements on social media, Ms. Owens validates and acknowledges the false and defamatory statements by "liking" the derogatory behavior. Exhibits 8, 9, and 10.

37. The commonality of Defendant attacking public figures, does not justify defamation. Defendant appears to take pride in having built her public persona, in part, by attacking and disparaging such celebrities and public figures as musician and actor Harry Styles, rapper Cardi B, tennis player Naomi Osaka, and entertainment personality Chrissy Teigen.¹⁶ By way of specific example, while much of the world was expressing sympathy and understanding for Naomi Osaka for withdrawing from the French Open due to mental health concerns, Defendant berated Ms. Osaka on Twitter by stating "She's starting to get soooooo annoying. Just quit tennis and become a full time activist. You make millions and are now complaining (again) because you think you're a special snowflake that shouldn't have to do press conferences because they are a form of 'mental abuse'."¹⁷ Defendant continued her unnecessary harassment "[']Change['] doesn't make people uncomfortable. Annoying, overprivileged, multi-millionaires who don't even touch their own door handles, crying about how hard their lives are— that makes people uncomfortable. You have now become insufferable. Just quit the sport."¹⁸

38. The Defendant's false and defamatory statements against Ms. Klacik have caused significant and ongoing harm to Ms. Klacik's professional and personal reputation. The Defendant's allegations have not only been republished in national media outlets, such as

¹⁶ Heran Mamo, *All of Candace Owens' Biggest Celebrity Feuds: Harry Styles, Cardi B, Kanye West, and More*, BILLBOARD (Nov. 17, 2020); NewsOne Staff, *Every Receipt Proving Candace Owens Is A Con Artist Who Is Following The Money*, NEWSONE (July 8, 2021).

¹⁷ Candace Owens (@RealCandaceO), Twitter (May 30, 2021), https://twitter.com/RealCandaceO/status/1399210325153660932?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1399210325153660932%7Ctwgr%5E%7Ctwcon%5Es1_&ref_url=https%3A%2F%2Fwww.newsweek.com%2Fnaomi-osaka-candace-owens-french-open-1596350.

¹⁸ Candace Owens (@RealCandaceO), Twitter (May 30, 2021), <https://twitter.com/RealCandaceO/status/1399210661717196802>.

Newsweek,¹⁹ but also throughout social media outlets by individuals intending to damage Ms. Klacik.²⁰ Politicians have cancelled fundraising appearances with Ms. Klacik as a result of Defendant's allegations. Exhibit 11 provides a specific example of such cancellation. Even a simple review of the comments on Ms. Klacik's social media platforms provides a clear picture of the reputational harm Defendant's defamatory statements have caused Ms. Klacik.

39. Ms. Klacik and her family are harassed via social media, telephone, and in person, on a daily basis, regarding the Defendant's Video. Attached as Exhibit 12 is one of many examples of such behavior.

40. Ms. Klacik also has lost significant professional opportunities. Because of the Criminal Allegations made in the Video, Ms. Klacik lost a book deal, had a contract cancelled with a nationally recognized vendor, and lost thousands of dollars in potential donations to Red Renaissance, an organization for which she serves as President. Attached as Exhibits 13 and 14 are two examples of lost financial opportunities as a direct result of Defendant's tortious conduct.

Count 1
Defamation Per Se

41. Paragraphs 1 through 40 are incorporated by reference as if fully stated herein.

42. Defendant has intentionally, knowingly and/or recklessly published and disseminated false and defamatory statements to third parties of and concerning Ms. Klacik that have caused and continue to cause substantial injury to Ms. Klacik's reputation and business, among other things.

¹⁹ Crump, *supra* Note 6.

²⁰ The Officer Tatum, *Candace Owens EXPOSED FAILED CANDIDATE Kimberly Klacik*, YOUTUBE (June 21, 2021); Tatum Clips, *Kimberly Klacik EXPOSED by Candace Owens*, YOUTUBE (June 23, 2021).

43. Defendant's false and defamatory statements and the implications drawn from Defendant's statements of and concerning Ms. Klacik are defamatory because they falsely accuse Ms. Klacik of criminal activity, injure Ms. Klacik in her personal and professional capacity, and cause third parties to think less of Ms. Klacik.

44. Defendant made these false and defamatory statements about Ms. Klacik with knowledge of their falsity and/or reckless disregard as to their truth or falsity.

45. Defendant made these false and defamatory statements with actual malice, and with the intent of harming Ms. Klacik.

46. Defendant's false and defamatory statements have caused substantial injury to Ms. Klacik's reputation, business relationships, and other interests.

47. Defendant's false and defamatory statements have caused Ms. Klacik and the organization for which she serves as President, Red Renaissance, Inc., to sustain damages of hundreds of thousands of dollars.

48. Defendant's actions against Ms. Klacik were willful, wanton and malicious, and Defendant intended her actions to deliberately harm Ms. Klacik.

WHEREFORE, Ms. Klacik respectfully prays that this Honorable Court:

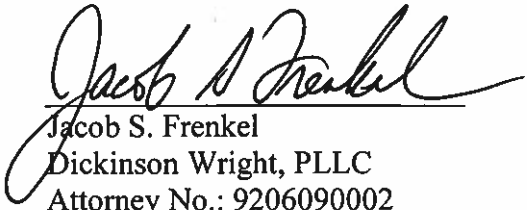
- a. Award Ms. Klacik compensatory damages in an amount to be determined at trial, but in no event less than \$20,000,000, together with punitive damages, interest, costs, reasonable attorneys' fees and other expenses;
- b. Award such other and further relief as is deemed just and proper.

Jury Demand

Pursuant to the Maryland Constitution and MD Code Ann., Civil Procedure §2-325, Ms. Klacik hereby demands a jury trial.

Dated this 21st day of July 2021.

Respectfully submitted,

By: 

Jacob S. Frenkel

Dickinson Wright, PLLC

Attorney No.: 9206090002

1825 I Street, N.W., Suite 900

Washington, D.C. 20006

P: 202-466-5953

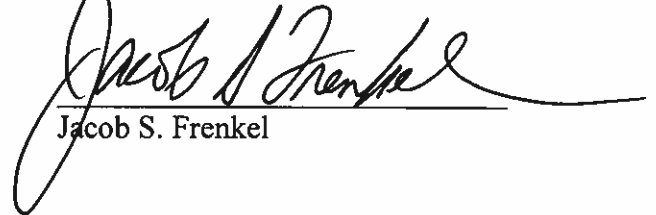
E: jfrenkel@dickinsonwright.com

Attorney for Plaintiff

MARYLAND RULE 1-313 CERTIFICATION

Pursuant to Maryland Rule 1-313, Jacob S. Frenkel hereby certifies that he is admitted to practice law in Maryland.

Respectfully submitted,



Jacob S. Frenkel

IN THE CIRCUIT COURT FOR Baltimore County

(City or County)

CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: PLAINTIFF DEFENDANT CASE NUMBER C-03-CV-21-002361
(Clerk to insert)

CASE NAME: Kimberly Klacik vs. Candace Owens
Plaintiff Defendant

PARTY'S NAME: Kimberly Klacik PHONE: 410-458-3961

PARTY'S ADDRESS: [REDACTED]

PARTY'S E-MAIL: kimklacik@gmail.com

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Jacob S. Frenkel PHONE: 202-466-5953

PARTY'S ATTORNEY'S ADDRESS: 1825 I Street, N.W., Suite 900, Washington, D.C., 20006

PARTY'S ATTORNEY'S E-MAIL: JFrenkel@dickinsonwright.com

JURY DEMAND? Yes No

RELATED CASE PENDING? Yes No If yes, Case #(s), if known: _____

ANTICIPATED LENGTH OF TRIAL?: 0 hours 10 days

PLEADING TYPE

New Case: Original Administrative Appeal Appeal

Existing Case: Post-Judgment Amendment

If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

TORTS

- Asbestos
- Assault and Battery
- Business and Commercial
- Conspiracy
- Conversion
- Defamation
- False Arrest/Imprisonment
- Fraud
- Lead Paint - DOB of Youngest Pt: _____
- Loss of Consortium
- Malicious Prosecution
- Malpractice-Medical
- Malpractice-Professional
- Misrepresentation
- Motor Tort
- Negligence
- Nuisance
- Premises Liability
- Product Liability
- Specific Performance
- Toxic Tort
- Trespass
- Wrongful Death

CONTRACT

- Asbestos
- Breach
- Business and Commercial
- Confessed Judgment
- (Cont'd)
- Construction
- Debt
- Fraud

PROPERTY

- Government
- Insurance
- Product Liability
- Adverse Possession
- Breach of Lease
- Detinue
- Distress/Distrain
- Ejectment
- Forcible Entry/Detainer
- Foreclosure
- Commercial
- Residential
- Currency or Vehicle
- Deed of Trust
- Land Installments
- Lien
- Mortgage
- Right of Redemption
- Statement Condo
- Forfeiture of Property / Personal Item
- Fraudulent Conveyance
- Landlord-Tenant
- Lis Pendens
- Mechanic's Lien
- Ownership
- Partition/Sale in Lieu
- Quiet Title
- Rent Escrow
- Return of Seized Property
- Right of Redemption
- Tenant Holding Over

PUBLIC LAW

- Attorney Grievance
- Bond Forfeiture Remission
- Civil Rights
- County/Mncpl Code/Ord
- Election Law
- Eminent Domain/Condemn.
- Environment
- Error Coram Nobis
- Habeas Corpus
- Mandamus
- Prisoner Rights
- Public Info. Act Records
- Quarantine/Isolation
- Writ of Certiorari

EMPLOYMENT

- ADA
- Conspiracy
- EEO/HR
- FLSA
- FMLA
- Workers' Compensation
- Wrongful Termination

INDEPENDENT PROCEEDINGS

- Assumption of Jurisdiction
- Authorized Sale
- Attorney Appointment
- Body Attachment Issuance
- Commission Issuance

CONSTRUCTIVE TRUST

- Constructive Trust
- Contempt
- Deposition Notice
- Dist Ct Mtn Appeal
- Financial
- Grand Jury/Petit Jury
- Miscellaneous
- Perpetuate Testimony/Evidence
- Prod. of Documents Req.
- Receivership
- Sentence Transfer
- Set Aside Deed
- Special Adm. - Atty
- Subpoena Issue/Quash
- Trust Established
- Trustee Substitution/Removal
- Witness Appearance-Compel

PEACE ORDER

- Peace Order

EQUITY

- Declaratory Judgment
- Equitable Relief
- Injunctive Relief
- Mandamus

OTHER

- Accounting
- Friendly Suit
- Grantor in Possession
- Maryland Insurance Administration
- Miscellaneous
- Specific Transaction
- Structured Settlements

IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|--|--|---|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input checked="" type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input checked="" type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input checked="" type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated *Liability* above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded. Liability is not conceded, but is not seriously in dispute. Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- Under \$10,000 \$10,000 - \$30,000 \$30,000 - \$100,000 Over \$100,000
- Medical Bills \$ _____ Wage Loss \$ _____ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

- | | | | |
|----------------|---|--------------------------|---|
| A. Mediation | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | C. Settlement Conference | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B. Arbitration | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | D. Neutral Evaluation | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

SPECIAL REQUIREMENTS

- If a Spoken Language Interpreter is needed, check here and attach form CC-DC-041
- If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form CC-DC-049

ESTIMATED LENGTH OF TRIAL

With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL.

(Case will be tracked accordingly)

- | | |
|---|--|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input checked="" type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- | | |
|---|--|
| <input type="checkbox"/> Expedited- Trial within 7 months of Defendant's response | <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response |
|---|--|

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.

- Expedited** - Trial within 7 months of Defendant's response **Standard** - Trial within 18 months of Defendant's response

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.

CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- Expedited Trial 60 to 120 days from notice. Non-jury matters.
- Civil-Short Trial 210 days from first answer.
- Civil-Standard Trial 360 days from first answer.
- Custom Scheduling order entered by individual judge.
- Asbestos Special scheduling order.
- Lead Paint Fill in: Birth Date of youngest plaintiff _____.
- Tax Sale Foreclosures Special scheduling order.
- Mortgage Foreclosures No scheduling order.

CIRCUIT COURT FOR BALTIMORE COUNTY

- Expedited (Trial Date-90 days) Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
- Standard (Trial Date-240 days) Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases.
- Extended Standard (Trial Date-345 days) Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
- Complex (Trial Date-450 days) Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

July 21, 2021
Date

1825 I Street, N.W., Suite 900
Address

Washington DC 20006
City State Zip Code

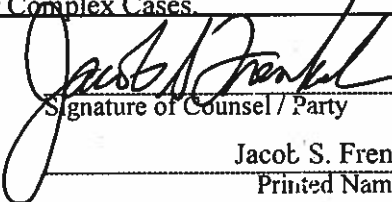

 Signature of Counsel / Party 9206090002 Attorney Number
 Jacob S. Frenkel
 Printed Name

EXHIBIT # 1

CANDACE OWENS

ON INSTAGRAM

JUNE 22, 2021

<https://www.instagram.com/p/CQcQ-oEpM-V/>

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CANDACE OWENS
ON INSTAGRAM
JUNE 22, 2021

<https://www.instagram.com/p/CQcQ-oEpM-V/>

1 MS. OWENS: Okay. Instagram, let's start at the
2 very beginning. This one is really important. Doesn't
3 really matter how you feel about me, you got to watch
4 this. If you are a sincere patriot, if you love this
5 country, and if you are a Republican, most
6 importantly, you should be watching this because we
7 are all getting played and we are all getting scammed
8 and it is embarrassing to me that this is something
9 that I uncovered.

10 We have tons of organizations that have, you
11 know, raised millions and millions of dollars that
12 should be protecting voters and doing due diligence
13 and getting to the bottom of certain things. Okay. So
14 first and foremost, my show tonight is at 9:00 p.m.
15 Eastern. And I am talking about Juneteenth and that
16 is the most appropriate topic to talk about, because
17 this is actually what unpacked all of this quite
18 ironically.

19 So those of you that were following this, and a
20 lot of people were commenting, didn't know what was
21 going on were like, oh, conservative, infighting. I
22 don't want conservatives to be infighting. You have
23 no idea what you are talking about. This may have
24 started as conservatives infighting.

25 What actually is happening now is that I have

1 stumbled upon something that no conservatives or the
2 majority of conservative Republicans don't know, the
3 majority of majority public is not aware of. And that
4 I'm actually going to invite all of you guys to join
5 me in investigating, because there's so much here
6 that it's overwhelming.

7 It's so overwhelming about Kimberly Klacik and
8 what the implications are here is that, you know,
9 where there's one there's many. And so honestly,
10 legitimately, if you have a pen and a paper, you
11 might want to start writing some of this stuff down
12 because you're going to have to then investigate and
13 keep it going.

14 I'm not an investigative journalist, but this is
15 the first time that I'm acting in that capacity. So I
16 reached out to different people and, you know, asked
17 them to clarify what I was reading in terms of these
18 documents, to make sure that I didn't make any
19 mistakes. And that was why I wanted to hold off on
20 doing a live, because I didn't want to be
21 irresponsible.

22 And obviously, the only reason I started this
23 was because of what started as a petty Twitter feud
24 that led me down a path with so many twists and
25 turns. I'm just like, what is happening? This is

1 crazy. All right. So let's start from the beginning.
2 Obviously, there's been this random thing that keeps
3 happening to me where a black conservative will be
4 running for Congress in a random district.

5 You know, somebody that no one's ever heard of,
6 like, you know, great, awesome. They do a catchy
7 video. They raise a bunch of money and somewhere
8 along the line, they just start attacking me. Like
9 I'm not their candidate they're running against in
10 Congress, but they're usually just kind of are trying
11 to prove like I'm a different black person than
12 Candace.

13 And I really care about black causes. Like, I
14 can probably say it. And the irony being is that
15 every single one of these black congressional
16 candidates has asked me for endorsement; okay? Full
17 stop. I can drop it. It doesn't matter. Is it like,
18 you know, this is not relevant to, I could drop it,
19 but everyone messages me and says, ask me for
20 endorsement.

21 Oh, love you. We would love to connect. And then
22 if I don't endorse them, because I actually believe
23 that it's irresponsible to endorse people without
24 knowing them and doing your due diligence, then
25 suddenly it's like, I hate Candace and I'm just going

1 to keep hitting her. So this entire story obviously
2 starts with Kimberly Klacik. She notoriously run in
3 Baltimore. I think she's running again. I don't think
4 she will be after this investigation on this video.

5 But, you know, she just came after me on Twitter
6 one day and about me saying that Juneteenth is a
7 scam. It is. Again, [daily wire.com/subscribe](https://www.dailywire.com/subscribe). Use my
8 code Chrissy and tonight's episode I will unpack why
9 Juneteenth is a scam being orchestrated by Democrats.
10 And it's not about celebrating black freedom, but she
11 was upset by these comments.

12 And she made an allegation about me and said
13 that, you know, Candace doesn't do anything with the
14 black community. I'm paraphrasing here, but Candace
15 didn't do anything for the black community. She's not
16 around the black community. And I basically responded
17 and was like, listen, I'm not, you know, a part of
18 the group of people that are grifting hundreds of
19 thousands of dollars from Republicans.

20 And it was this tweet that sent me on a search
21 because she answered -- and I want you to look into
22 this yourselves. She answered and she said, well, I
23 actually, I said to her, like I run a charity. I
24 raise money for, you know, black people whose
25 businesses were destroyed during the Black Lives

1 Matter riots, which I did.

2 We raised over six figures or bought businesses
3 that were destroyed. We obviously employ a ton of
4 minorities. It's not a requirement, just happens to
5 be that usually, you know, suppose somebody on the
6 ground will get super involved with Blexit. And then
7 we'll say we should actually hire them as an
8 employee. So right now all of our employees barring
9 one are actually minorities. It just, you know, we're
10 in over 30 states, we have state leaders all across
11 the country and we do a great --

12 Is that working? Is everybody getting me on? It
13 just told me that this paused. Just want to make sure
14 I get better service. I don't want to start this and
15 then have people say that they can't see things. So
16 yeah, so basically, you know, Blexit, we're having an
17 event this weekend in Birmingham, AL.

18 Like, there's just like, you know, we are doing
19 a ton of work and I've worked really hard to build
20 this organization over the last two years. We
21 officially got our 501C3 last year. That's neither
22 here nor there. So she responded to that and she made
23 a comment that was really weird. She said, I have a
24 charity and I have placed over 200 women -- minority
25 women into job careers.

1 And I thought that was a strange comment because
2 I know how hard it is to get a charity off the
3 ground. And, you know, I just said something about
4 that just didn't really sit right with me. I was
5 like, oh, I've never even heard about your charity.
6 What is it? And I asked her for the name privately
7 and publicly, and she didn't give it to me, but
8 somebody in the comments gave it to me.

9 And the charity, if you are using a pen and a
10 paper right now is called -- what is it called? S- --
11 something me like particular me. It's like something
12 weird like that. I can't think of the name. You guys
13 can look it up. I can't even think of the name of the
14 charity right now. Gosh, I should really have this on
15 the tip of my tongue, but it's such a weird name.
16 It's like P something me or whatever.

17 And so I looked into this charity and, you know,
18 just asked her for the tax ID number tons of times.
19 She was like, I can't get it to you right now. I'll
20 get it to you later. Like all of this stuff, just
21 being like, okay, what's the name of your charity?
22 You have -- this is a great work. I said, you know,
23 she said that I don't have enough people on my show,
24 you know, from underserved communities.

25 So I say, we'll highlight your charity, come on

1 the show. And I finally looked into the charity
2 because as a charity, you have to file all of your
3 documents online. And it's very easy to discern
4 what's a real charity and what's not. And when I
5 first looked up the charity's name on its F- -- its
6 Facebook page came up.

7 And the Facebook page basically just had her
8 personal cell phone number listed and it was a bunch
9 of pictures of people that were holding clothes that
10 she had picked up. Like we're picking up more clothes
11 and we're giving them to people. I guess the idea is
12 that she dresses them, you know, for their
13 professional career. And so it's very obvious that
14 yes, she has picked up a lot of clothes. That's where
15 you can discern from looking at this charity.

16 Weird thing though, is that when I pulled up the
17 filings, despite this charity being around since
18 2013, she had only filed three tax returns, which is
19 super unusual. And when I looked at the tax return,
20 she claims that she made no money last year, no money
21 this year. But that she made \$6,000 in one year that
22 she filed and that that money was used to help girls
23 get their makeup done for prom.

24 So like nothing close to what she's saying
25 online, nothing about placing women into career

1 positions. I asked her to give me the names of the
2 people that, you know, the -- the website is defunct.
3 So there's no website, nothing exists other than her
4 word saying that Potential Me. Thank you to the
5 person who just wrote that.

6 It was called Potential Me. So, sorry guys, I
7 just like blew my nose before I came on here. So,
8 yeah, it's called Potential Me. And there's nothing -
9 - there's no website. She can not give you the 200
10 people's names that she placed into professional
11 careers. And she instantly deleted that tweet once I
12 asked her for more information on it, and then I said
13 to her, like, you know, why isn't the website
14 working? She said to protect the people like somehow
15 she said that people are vulnerable.

16 And that even me looking into this charity would
17 make these women even more vulnerable. So she's using
18 this, like, you know, I have to protect the women. I
19 have to protect the women, which is such a tactic,
20 like, okay, give me the name of the corporations that
21 you work with. Two hundred women being placed in
22 jobs. She can't give me anything. And she basically
23 then says, you know, I'll have somebody look into
24 your charity.

25 Okay. It's called Blexit. Go for it. We have a

1 whole website. We have employees, like, we do public
2 filings. Like you do your thing. Go look into Blexit.
3 So obviously to me, I then searched the char- -- like
4 the Potential Me, and I see that she has a PayPal
5 account and the PayPal account says that she collects
6 clothes and she sells them on eBay for profit. And
7 then she gives the profit to women in need.

8 So that's not what she says on -- on Twitter.
9 It's not what she says on her IRS filing. So why is
10 there an eBay account that she's allegedly selling
11 clothes on? And where's the money from that account?
12 Because apparently she's only made \$6,000 according
13 to the 2014 filings. But the pictures of like, she's
14 picked up a ton of clothes. So in my head I'm like,
15 okay, like she probably is running like a little bit
16 of a charitable scam.

17 Like that was my thought, like, that's my, like,
18 opinion. Or she's just picking up clothes and selling
19 them on eBay and pocketing the money. And that's why
20 she doesn't want to give me any names or anything,
21 but like who cares; right? This is like petty stuff.
22 Like in terms of the scheme of things, running a
23 charitable scam for 10 years, you know, it's bad, but
24 doesn't raise of a level of like, oh my God, this is
25 crazy.

1 So I asked her to come on the show and she was
2 very hesitant and said she was booked until August
3 and likes said all this stuff. And so I asked her if
4 September would be better when I word -- said the
5 word September, she freaked out and it was so weird.
6 And she was like, that's not funny. And I was like,
7 what's not funny. Like you just said, you were booked
8 until August, can you do September? And she said, oh,
9 it was this whole legal battle I had. Like, never
10 mind.

11 Which brought me to find after I was looking
12 into her charity, a clip on The View of all places
13 where Sunny Hostin is commenting on Kimberly Klacik.
14 And she says like, all I'm going to say is September.
15 Is it September? I'm paraphrasing. Is it September?
16 And I was like, what is with this word September?
17 Like, why is this like a Kimberly Klacik buzzword?

18 So I do a little digging and I find out that
19 Kimberly Klacik was a stripper named September. And
20 that her husband was the manager of the strip club.
21 It's a strip club in like in the Baltimore region in
22 Maryland and allegedly they met stripping and like,
23 she was the person who helped bring a lot of
24 strippers into this club.

25 And so I thought, wow, this is really

1 interesting because this person attacked me and said
2 that I am a bad look for the black community. I'm not
3 good for the black communities. I don't want to
4 celebrate Juneteenth. And yet the debauchery that
5 happens at a strip club, the vulnerable women that
6 are at strip clubs, and the idea that you married
7 someone who was the manager of the club, kind of
8 seems like maybe something relative that Republicans
9 should know.

10 None of them know this, and you've raised \$8.2
11 million talking about family values. And I researched
12 to confirm that her husband was the manager of the
13 club. It was an old listing in the Maryland page --
14 Maryland white pages that had him listed as a manager
15 of the club. So all of that checked out.

16 And there were pictures of her in the strip
17 club, a lot of pictures of her in the strip club,
18 about five pictures, plus a stripper holding a
19 picture, sorry, a picture of her holding a bunch of
20 singles, which I will maybe post later. And she's
21 just holding a bunch of like ones and she's in like a
22 very suggestive outfit and she's in front of the
23 strip club in front of the strip pole.

24 So just seems a little off-brand for someone who
25 has just said that, you know, she supports family

1 values and like, she really cares about Baltimore. If
2 you really care about Baltimore, why -- why are you
3 in the inner cities doing this? Because we know what
4 strip clubs are about. And that's not to say that you
5 can't be a stripper and reform yourself, but this
6 isn't that story; right?

7 She's not like she's not like she's come out and
8 talked about being a stripper. And she's upset that
9 I'm not celebrating Juneteenth and is saying that I'm
10 bad for the black community. So I'm like, that's a
11 little like ironic; right? It's just a little bit
12 ironic, like, okay. So the person -- because I wanted
13 to confirm that she was a stripper before I put that,
14 you know, even put that out there and I wasn't even
15 sure if I was going to put it out there.

16 I wanted to source like where these pictures
17 were coming from. And I came across another stripper
18 who works at the club, who works at the club
19 currently. And I just asked her outright, you know,
20 does Kimberly Klacik work at this club? Like, are
21 these images doctored in any way? And the woman came
22 back and she's a very proud stripper and she still
23 strips. And she said, they're 100 percent not
24 doctored.

25 I know her very well. I partied with her in the

1 strip club, like I -- I worked with her in the strip
2 club. You know, her and her husband had been scamming
3 people for millions and she said, and I'm going to be
4 very strong with that, there's no way that I can, as
5 someone can confirm this. But she said it to me in
6 writing that they used campaign money to do cocaine
7 in the strip club.

8 And she said she had -- I have all the receipts
9 and I can prove it sort of a thing. And I was like,
10 whoa, okay, well, that's different because what this
11 stripper was alleging would be a crime obviously. And
12 I can't possibly verify that information. Like
13 there's no way to verify that. Give me one second. I
14 just need to like literally blow my nose hold on.

15 Sorry, I had like a legit sneezing fest before I
16 went on live. So I was like, I still need to blow my
17 nose. Okay. So the -- yeah, so the stripper has like
18 now come and said, like, she's got all the receipts
19 and like, this is now getting like, very like, you
20 know, dramatic in terms of like this allegation that
21 she uses campaign finances to do that.

22 And that's a very serious allegation because
23 you're talking about people that are being corrupt
24 with money and you're talking about a lot of
25 Republicans who got scammed and this actually like, I

1 was like, hmm, I don't know if I'm going to report on
2 the stripper thing, but then when she said the thing
3 about using campaign money, I then kind of said to
4 myself, what's really funny about what I immediately
5 think about when I think about strip clubs.

6 I think of money laundering. I think of people
7 who hide money. Strip clubs, casinos are like really
8 the number one joints, if you will, that people use
9 to launder money because they're very, you know, into
10 cash. It's like, you know, they're cash based
11 business. And so in my head I thought to myself,
12 okay, the charity was a bit weird, seemed like a
13 weird thing to have that wasn't going. So that seems
14 a bit finance buggy weird.

15 And now we have the stripper claiming that she
16 wasn't using her campaign funds appropriately. So
17 obviously the next step to me, the obvious step, and
18 this is where it just gets crazy insane is let me
19 just look at her filing. It was like she just ran for
20 Congress. I'm like this stripper can't make this
21 allegation. I should be able to see some weird
22 spending on her FEC report. I now invite you all to
23 pull up Kimberly Klacik's FEC disbursements report.

24 You just have to go to literally fec.gov. It's
25 very easy to use. Probably the only easy website our

1 government has. And you can look in the search bar.
2 You can type in Kimberly Klacik, it'll pop up and it
3 will show you every single dollar that she has spent
4 in her campaign, because they have to.

5 The irony being that there was all this
6 firestorm that the left was looking into her campaign
7 financing because she notoriously raised about \$8.2
8 million because of that video of her strutting down
9 the street. And it's a late game in life for like,
10 you know, a 40 year old woman. She's 40 years old,
11 decided that she wants to run for Congress and be
12 this spoken Republican.

13 And she raised all this money and the Washington
14 Post and all these people were looking into the --
15 into her finances. And they kept looking at this
16 company that had gotten the most money out of her,
17 like, you know, \$4 million. And it actually is a
18 legit company. That's what they determined from all
19 of the search. I know the company I'm aware of it. So
20 like that actually wasn't shady.

21 It was just that company got lucky because of
22 the way that they structured the campaign and they
23 got a ton of money. And so the Washington Post kept
24 looking at that company and they never looked at any
25 other company on her sheet. And I did. So the first

1 thing that jumped out at me, I basically just sorted
2 it by the most, you know, the biggest checks that she
3 wrote and that were off at her company.

4 And like she pays her manager a ton. Okay. Fine.
5 Totally fine. Manager/treasurer. But the first thing
6 that really jumped out at me on the FEC reports,
7 again, you can look this up yourself was that on
8 November 5th, you know, after the election, she wrote
9 -- they -- they wrote off a disbursement for \$119,000
10 plus, to Pearl Events. That was the name of the
11 company. And if you look at the receipts, she wrote
12 it as a meet and greet.

13 So I don't know, maybe I'm just not rich enough.
14 I can't fathom in my head why a meet and greet with a
15 congressional candidate would cost \$119,000. But I
16 tried in my head, I fathomed in my head. I said,
17 okay, maybe -- maybe this is for the whole season.
18 And this is the only firm she used Pearl Events. And
19 somehow they are saying it's \$119,000, which sounds
20 like a scam to me, like Pearl Events.

21 But then I look further down in her receipt and
22 she's got tons of meet and greets and they all cost
23 \$1,000, \$2,000. Like that sounds about right.
24 \$119,000 at the very end, seems like you're trying to
25 move money off the books to me; right? So I'm like,

1 all right, well, let me look into Pearl Events. That
2 seems like the next logical thing to do. Like
3 obviously, like it's a business.

4 So all you have to do, it says it's a Maryland
5 company, she put the address of the Maryland company
6 on there. And so I just looked up, I went to the
7 Secretary of State website because all businesses
8 have to file to maintain like, you know, their
9 business registration. So I went onto the Marilyn
10 website and look up Pearl Events and what do I find?

11 I find that this is a company that has been
12 forfeited. It's not a real company. It did not
13 because it refused to file tax returns over years,
14 Maryland revoked it. You know, it was called
15 forfeiting the company. So it's legally not a company
16 doesn't exist, essentially. And yet she, but of
17 course, if your company gets forfeited by the state,
18 Secretary of State, your bank accounts, don't
19 magically close.

20 So whoever -- close. So whoever's behind this,
21 you know, still has the bank accounts and they have
22 taken it \$119,000 from Kimberly Klacik for a meet and
23 greet. Okay. So you're thinking maybe Candace, like,
24 you know, maybe Kim didn't know, and she used this
25 company Pearl Events. Well, even more weird to look

1 into the registration of the company and the
2 formation docs, which tells you what the purpose of
3 the company is.

4 And this company says it's about real estate. So
5 I don't really know what this has to do with a meet
6 and greet. This seems pretty shady. Let me see who
7 signed these docs. Well, it turns out that a -- even
8 though his company is defunct, you can still look at
9 the articles of incorporation, the articles of
10 incorporation indicate that the person, the
11 registered agent on this business is a man, by the
12 name of Dust- -- Dustin -- Dusky Holman. I swear
13 Dusky Holman.

14 And I know what you're thinking. You're like,
15 Candace, it sounds like Better Call Saul. Like, I
16 mean, really that's what I was thinking. And if you
17 look up like the address, it looks like a Better Call
18 Saul. Like it looks like this is where Better Call
19 Saul was filmed.

20 So I'm like Dusky Holman is a lawyer. I look it
21 up. He's in Maryland. I'm like, okay, well, this guy
22 checks out. He's got his name on various things.
23 Like, it just sort of seems random, but at least he's
24 a lawyer. And so apparently, you know, lawyers don't
25 do things that are bad; right? Wrong. So I then

1 decided to look up this lawyer and he is suspended.
2 He does -- he's not a lawyer that is allowed to
3 practice.

4 So the business doesn't exist. It's been revoked
5 by Maryland and the lawyer is suspended. And yet she
6 has given \$119,000 after her election to this random
7 company. So I asked her like, I'm not even, like I --
8 I say to her a thousand times, like, I'm not here to
9 try to like, take you down. I want answers. We
10 deserve answers now because this now went from you
11 being really nasty to me on Twitter for no reason to
12 like this is potentially a federal crime. So you
13 should answer.

14 And I asked her about the stripper thing. I
15 asked her about this random Dusky Holman, Pearl
16 Events that's not an event company, but did a meet
17 and greet that cost \$119,000. She's just while in the
18 background, by the way, she's just saying like, ooh,
19 you looking into me. Like things must be bad with you
20 and your husband.

21 And I'm like, okay, cool. Anyways, back to this
22 Pearl Events, ooh, you know, and then she's like, oh,
23 well, I'm going to have people look into Blexit. I'm
24 like, okay, cool. Let's get back to the stripper
25 claim. And she's just like all over the place in the

1 background, like, you know, like posting stuff and
2 all this stuff.

3 And I'm like, nope, I'm going to stay calm. And
4 I'm going to keep looking into this because this is a
5 potentially huge story if we're being scammed. So
6 that entire thing makes no sense. And every single
7 person, every single person who gave a single dollar
8 to her campaign, plus any conservative should demand
9 an answer about that charge; okay?

10 So let's -- you'd think that's it. It's not. I
11 promise you it's not, it gets crazier. It's -- it's
12 about to get crazy. So then I -- oh, sorry. I think I
13 like accidentally commented on my own thing. So then
14 I keep looking at it, her report again, I'm only like
15 five lines down like this isn't even like, you know,
16 crazy. I'm like literally like I'm still on the first
17 page.

18 And I see three accounts again towards the end
19 of her campaign, three charges off for 75,000 per
20 charge offs. So 75,000 three times in a row. And that
21 instantly like raised a red flag for me because like,
22 it's just weird to have a flat charge at \$75,000.
23 Exactly. Zero cents. Like that is a weird charge;
24 right? Like three times in a row. I'm like what cost
25 exactly \$75,000, three times?

1 And then I look a little further down and again,
2 it's \$30,000 and it's all going to a company called
3 Fox and Lion, LLC. Okay. Cool. So got the stripper
4 part. We got this, like now Fox and Lion, LLC, and
5 these just random charges; right? Like I'm like --
6 like an FBI IRA -- IRS agent at this point. Because
7 I'm like, okay. That just seems weird to me. So I'm
8 just going with my instincts and I hit that charge.

9 And it says that this is for canvassing. Now
10 again, you'll be thinking, okay, maybe for a --
11 towards the end of her campaign like this -- they
12 fronted the cost and Fox and Lion, LLC did knock --
13 knocking on doors canvassing, and somehow it costs,
14 you know, about \$275,000. And she's paying them very
15 quickly towards the end of her campaign.

16 And I just said to myself, okay, like it -- this
17 still seems like a little weird. So I'm going to look
18 into this company and it seems weird because again,
19 if you look back, she's got other charges for
20 canvassing in Maryland and they see more appropriate,
21 like \$900, \$1,000 here, blah, blah, blah. I'm like,
22 that sounds like about the right cost to get people
23 to knock on doors.

24 \$275,000 towards the end of your campaign just
25 seems a little high, like, you know, again, I don't

1 run for office, so I'm like, maybe this is normal,
2 but this seems like some Maxine Waters paying her
3 daughter type weird stuff. So I'm like, that's my
4 gut. So I'm like, let me go with this because I -- I
5 already have seen that this earlier thing with Dusky
6 Holman, Better Call Saul guy is shady.

7 So I look into L- -- Fox and Lion, LLC. Get your
8 pens out ladies and gems. Get your pens out. And it
9 first comes up right away. It's got a Facebook page
10 and the Facebook page is weird because it's only has
11 three posts and it says veteran owned, black owned,
12 we'll help you get elected. Like, you know, and we
13 will do like a campaign.

14 So it's pretending at least that it's about
15 politics, but three posts is weird and I then go to
16 the website of Fox and Lion, LLC. And the first thing
17 that jumped out at me was this stock photo. Like, I
18 mean, like basic stock photo, like make your own
19 website 101 type stock photo that I literally use an
20 old blog that I have and you just get free photos. If
21 you literally Google free stock images computer, like
22 it's like the first one that comes up.

23 And I was like, that's weird because like, you
24 know, if this person's making this much money, like
25 shouldn't this website look a little bit differently?

1 And so I check, you know, the Secretary of State
2 again in Maryland to see when this company was
3 registered. It was registered in June of 2020, just a
4 couple of months before her election day. So brand
5 new company, she decides to go with it and it says
6 that this company is being run by a man named Andy
7 Pierre. Andy Pierre.

8 This is when things get really strange. Andy
9 Pierre ran for a Democrat House seat in Maryland two
10 years ago. And -- and well, technically three years
11 now in 2008. So, you know, two election cycles ago.
12 And I thought why would she hire a Democrat, you
13 know, and give them all of this money. And I look at
14 the website and the website claims to have helped
15 people in the past be elected -- all of them,
16 Democrats like the Honorable Judge, something
17 Talmage.

18 But when you click the links, they're all
19 broken. And I was like, that's weird Fox and Lion,
20 LLC. And there's no way you helped get this person
21 elected because that person's been in office for a
22 while and you have only been in business since June
23 of 2020, according to the Secretary of State filings.
24 So why is this money going to the Democrats?

25 So it's got a number on there. So I'm like, let

1 me just call; right? Ask my manager to call the
2 number. Dead line. Doesn't exist. Like it just is
3 like, you know, like beep beep sound like this number
4 does not exist. It didn't exactly say something, but
5 you know what I'm talking about. You can do it. Go to
6 Fox and Lion, look up Fox and Lion, LLC, and you will
7 see that it was -- it's a completely dead number and
8 there's nobody else associated with this, except for
9 this guy, Andy Pierre.

10 And if you look at that where it says it's
11 located, it's a personal address. It's an apartment
12 in Maryland. And so this is clearly to me not
13 appearing to be a real business at all, because if
14 you're making that much money, you just started, but
15 if you're making \$275,000 from Kimberly Klacik's
16 campaign, like, I don't know. I just feel like you
17 might have a working number you so she can respond to
18 you.

19 So I then go to his con- -- congressional
20 website from, you know, a couple of years past and it
21 has another number listed. We call it, it says, it's
22 his number, a girl picks up. And we're like, hi, is
23 this like Andy Pierre? And she just hangs up the
24 phone, which was super shady. And so I'm like, okay,
25 this is getting really weird. So I was like, well,

1 now he should have filed his tax returns for the past
2 year so I should be able to look this up.

3 Not going to believe this. I go to Secretary of
4 State's website and this business is not in good
5 standing because it failed to file tax returns. So
6 this business has been around for less than a year,
7 and yet decided not to file a tax returns, which is,
8 you know, her charity didn't file tax returns, Pearl
9 Events didn't file tax returns, this guy's business
10 didn't file tax -- now this new business that she's
11 working with failed to file tax returns, despite
12 taking \$275,000 from the Kimberly Klacik campaign.

13 So that seems weird. So I messaged her and I
14 asked her specifically about these two companies,
15 because just in that alone, you're talking about
16 someone who's taken about \$400,000 and it's just
17 completely been moved off of the books late in the
18 game of her election and none of these people can be
19 reached and it just it's like smoke and mirrors. It's
20 like, you're just, it's crazy.

21 I'm sitting here. Like I can't get a single
22 person on the, I can't get dusty on the phone, but
23 he's got \$119,000 of Republican money. I can't get
24 Andy Pierre, the Democrat candidate on the phone, but
25 he's got \$275,000 of Republican money. And I now

1 suddenly am blocked on everything. I -- I've asked
2 him these questions. I happened to have her number in
3 my phone because she asked me to endorse her.

4 I never answered her or responded, but I asked
5 her directly because I'm like, you know, at this
6 point she's like in the background about the stripper
7 stuff would say, I'll sue you for defamation. I'm
8 like, can you just say yes or no? If it's true or
9 false? She wouldn't say yes or no, wouldn't say true
10 or false. I'll threaten to sue and then blocked.

11 And so I was like, okay, well, if somebody asks
12 me if I was a stripper, I would just say, no, I
13 wouldn't threaten to sue him. I was just be like, no,
14 I'm just not. If somebody asked me if about, you
15 know, random corporations, if they were like,
16 Candace, we saw that Blexit paid X amount of dollars
17 to whatever consultant I'd be like, oh, yeah, we
18 definitely talked to that person.

19 Let me get the treasurer on the phone or
20 somebody on the Board of Directors to tell you why we
21 did that move or how that came about. We have an
22 entire Board of Directors, so I don't even get to
23 oversee my own salary at Blexit. Like I -- all that
24 has to be approved by the Board of Investors and so
25 it just like, the whole thing was just weird.

1 And so to me, it's weird when you're giving
2 money to Democrats that are running in Maryland, a
3 Democrat run company that's happened with Republican
4 values. And it just seems to me a bit like a scam.
5 Like, and again, I have to say allegedly, but I'm
6 giving you the questions that you can go and you can
7 ask, you know, and those questions would be
8 pertaining to Potential Me, while it's -- why it's
9 failed.

10 You know, how it's somehow made no money, but
11 has, as she claimed on Twitter, placed 200 people
12 into positions of power, women, and why they're too
13 vulnerable to ever speak out about the work she's
14 done for them. I would ask about the \$119,000, which
15 again, you can see on fec.gov \$119,000 to a non-
16 existing business entity, because when it is defunct,
17 it is nonexistent. So that money was moved off of the
18 books. And it is nonexistent.

19 That is a good time to ask that question to
20 Kimberly Klacik. And she will not answer me. I've
21 asked her all of this because I did not want to put
22 this out unless I tried to confirm this stuff she's
23 just blocked and is trying to gaslight. And of course
24 the last question being, I think the most significant
25 is why is money being moved to Democrats? To a

1 Democrat run business who works to elect Democrats
2 and yet nothing on the website works, which is
3 totally bizarre.

4 And the website says that they'll send out text
5 messages to your campaign, but it looks to me like it
6 was just created late in the day to move some money
7 off of the books. That's my conclusion, my feeling is
8 that some money was laundered. That's a feeling. I
9 can not confirm that, but I would love all of you
10 guys to ask the question to Kimberly Klacik.

11 Bottom line here, nobody knew she was a
12 stripper. Nobody knew she had these businesses.
13 There's so many LLCs involved that are being created
14 to help. And I actually had a reporter reach out to
15 me that is on our side and said, I knew this, like I
16 knew this about her, about the shipper stuff and all
17 of this stuff.

18 And basically when I approached her
19 treasurer/manager, who I also messaged to ask these
20 questions to and he has not gotten back to me. I was
21 told, well, Kimberly feels used by you in the GOP and
22 like, how dare you ask? It was perfectly out there
23 about her being, you know, a stripper and, you know,
24 allegedly a madame.

25 And so like he confirmed the rumors, but then

1 kind of gaslit like reporter that was asking and kind
2 of made that -- that quiet threat of like, if you say
3 anything about this, we'll just say that the GOP used
4 her and that you guys are racist. And she once said
5 something to that effect saying that she felt used by
6 the GOP.

7 And I think Harmeet Dhillon, the lawyer came
8 after her quite savagely on Twitter about being like
9 people gave you \$8.2 million. You spoke at the RNC,
10 like, how dare you say that we're using you? And what
11 it kind of reminds me of is sort of this new race
12 hustling industry that we're seeing that's happening
13 on the right where people say, okay, I'm going to
14 step on a platform.

15 I'm going to say some Republican things and no
16 one's going to look into me. And if they do look into
17 me or they start asking any questions, I'm going to
18 accuse them of being a racist or accuse them of not
19 supporting me enough. Like she was one of the biggest
20 campaigns of last year. It's \$8.2 million.

21 And why this -- even though it started as like
22 something stupid on Twitter, it's now spun into a
23 much more serious conversation about why nobody
24 caught this. Like, why didn't nobody look into this?
25 Like whose job is it to look into this? It's

1 certainly -- I'm a -- I'm a political commentator. I
2 write books. I'm an author. I don't, you know, look
3 into every congressional candidate. How did this slip
4 through the cracks?

5 You know, how did she slip through the RNC
6 cracks? How did this slip through -- Newsmax has had
7 her on, Fox news has had her on. Like, there are so
8 many huge conservative people that have given her a
9 platform and a voice including myself. I'm not even
10 excuse myself from that. I invited her to speak at the
11 Blexit event that we had in -- in Baltimore, she no
12 showed it and like ghosted us for 48 hours.

13 But you know, how -- how did all of this happen?
14 And nobody looked into this and then people that did
15 look into it were too scared to say anything. A lot
16 of conservatives knew this and they were scared to
17 say anything because they were getting, you know,
18 implicit threats that somehow even asking the
19 questions were racist.

20 So we have to be careful. We have to definitely
21 be careful because the irony being is -- is that all
22 of these candidates that come up and do a quick video
23 and say, oh, I'm saying Republican stuff. And I know
24 I've never said this, but I'm saying it and give me
25 money, are also the same ones that are sowing

1 division. It's the same ones that are sowing division
2 in the conservative movement.

3 I've never had like, you know, Burgess Owens,
4 like endorsed him. You know, he's never been like
5 trying to do anything that's crazy or anything like
6 that. Like he obviously -- John James, like the
7 people that don't start any problems are probably
8 legitimate people. There -- to me, this is a new
9 grift. And like I said, when I think of people, and
10 this is not to denigrate people that use stripping as
11 -- you know, as a profession to get money.

12 But I think of people that are looking to make a
13 quick buck and especially someone who partied in
14 strip clubs, the very least confirm that by the
15 pictures, her and her husband have partied at strip
16 clubs. Like at the very least like, how did we not
17 know that?

18 So that Republicans could've made a better
19 decision about whether or not this person actually
20 impacts, you know, or -- or -- or cares about
21 conservative principles when this person talks about
22 family, but did an interview saying that her husband
23 has, you know, five children out of wedlock. There's
24 allegedly a domestic violence. If you look up Jeffrey
25 Klacik domestic violence incidents in -- in Davidson

1 County, I mean, this is a pretty shady family out of
2 nowhere and yet took \$8.2 million.

3 And I think the thing that really bothers me
4 about this is because for everyone that says like,
5 oh, we shouldn't have any infighting. We should just,
6 no matter what standby people, no, like you're so
7 wrong. That's the left defending Hunter Biden smoking
8 crack pipes and saying nothing about it; right?

9 Like, it doesn't matter as long as this person
10 will vote the way we want them to? No. This is how
11 you get people in office that do horrible things or
12 turn their back on the conservative cause because you
13 don't do your due diligence or you're too
14 uncomfortable to have this discussion, you know?

15 To say, you know what? This is actually really
16 wrong and we need to investigate this; right? This is
17 potentially a federal crime that I'm talking about by
18 the way, potentially. I mean, maybe she's got an
19 excellent answer about, you know, why that money was
20 moved off the books late in the day and why all of
21 these businesses are, you know, not legit according
22 to the Mar- -- Maryland Secretary of State.

23 Maybe she has an excellent answer, but if she
24 doesn't, then we're talking about a federal crime
25 where you don't -- you don't do something, you don't

1 just move money off the books and give them to a non-
2 existing entity or business, not in good standing and
3 have no excuse for it.

4 So for all of the Republicans that think, oh,
5 well, you know, it's just drama. Like, no, this is
6 serious. This is serious stuff that we're talking
7 about. And we have to have the spine to stand up,
8 even when you're s- -- afraid that Republicans are
9 going to call you racist. If that -- if your reason
10 was I didn't want to be called racist and you allowed
11 this to take place, that's not a good excuse.

12 I had no idea. Genuinely. Genuinely until this
13 whole thing happened. I had no idea. If I had had an
14 idea, I would have said something a lot earlier. I
15 had a bad feeling about her in my -- in my gut, but I
16 had no proof. So there was no reason for me to say
17 one thing or the other.

18 So I hope that like this furthers the
19 conversation and that we feel encouraged to call out
20 people and we're not afraid, you know, don't let
21 somebody say to you, oh, well, if you don't agree
22 with Juneteenth and I'm a black conservative, then,
23 you know, you don't get it. It's because you're a
24 racist. It's like, no, that's the same stuff we're
25 fighting on the left. You're allowed to think

1 Juneteenth is stupid.

2 You're allowed to call out somebody for a
3 questionable history of creating a bunch of
4 businesses. You're allowed to call out someone's
5 husband for being the manager of a strip club or that
6 person for allegedly being the madame of that strip
7 club, you know, whatever -- whatever it is, you're
8 allowed to ask questions.

9 Like you always do it to me. You know, I -- it's
10 not about skin color. That's not what we believe in.
11 So I mean, I guess I will leave the last couple of
12 minutes for people to ask any questions. By the way,
13 I think pretty soon, 15 minutes. Oh no, no, no, no
14 it's 7:00 o'clock where I am. Two hours. Don't forget
15 [daily wire.com/subscribe](https://www.dailywire.com/subscribe). And you can use my code
16 Chrissy.

17 And I just better see you guys subscribing. I've
18 made such a great show. And this whole episode is me
19 talking about Juneteenth and really kind of that
20 pressure to make us feel like we have to support this
21 when we know that there's nothing but a political
22 effort from the left and we need to stop being
23 bullied by not just cons- -- you know, liberals call
24 us racist, but conservatives call us racist if we
25 don't say what they want them to say.

1 It's the new hustle. Any questions? Who's
2 responsible for promoting her? That's a very good
3 question, Julie. Everyone. So what happened, if you
4 guys know the backstory like why, how she kind of got
5 in the mix? Elijah Cummings died. Trump made a tweet
6 about like how he ruined Baltimore. It wasn't the
7 best timely tweet and everyone was killing him for
8 it.

9 Like, you know, figuratively killing Trump for
10 him like how could you say anything about Baltimore,
11 blah, blah, blah at this time? And Kimberly then
12 popped up and said, he's right. And like, I don't
13 know, did something in like the woods. And then Trump
14 promoted her and was like, great, excellent person.

15 And then overnight, like, you know, then she
16 made a video talking about this is Baltimore and that
17 video got millions of millions of views and people --
18 the RNC then invited her to speak. And I spoke to the
19 RNC about this because I wanted to sort of give them
20 a heads up on this and like, ask like, you know, did
21 you do any due diligence?

22 And like, for them, they were pulling together
23 this event late in the day. And it was like a last
24 second ad. And so, like I said, there's no one to
25 really blame, it's all of our faults. Like, you know,

1 there's no one, like somebody should be responsible
2 for this. And that's why I said that me and Kerryn
3 Tatum are actually now going to use Blexit to build
4 an interactive map, to tell you about the candidates
5 that are running.

6 Because I also have heard, and I'm not sure
7 again, you guys be investigators, too, look at the
8 fec.gov filings. You know, but also I've heard that
9 she's forming a super PAC with a bunch of other black
10 conservatives that are wanting that also have
11 questionable backgrounds. I don't know if that's
12 true.

13 Again, I just heard that somebody sent it to me
14 saying that like, it's going to become the new scam
15 of like run in a district that you can't possibly win
16 in, move some money off the books to fund your
17 lifestyle in between, and then be like, I'm going to
18 run again. I'm going to run again. I'm going to run
19 again. I'm going to keep running. And that's a great
20 lifestyle scam.

21 Bizarre things also in her filings like a
22 private plane for \$40,000. Like why would you need to
23 take a private plane? A \$40,000 jet is a big jet.
24 That's not a small jet. It's a big jet; you know? So
25 why did you need to take a private jet somewhere? And

1 why did it cost \$40,000? Now, maybe she had some last
2 minute time thing, but she took multiple private
3 flights. And that seems weird for somebody that's
4 running for Congress in the district.

5 You know, again, that's small stuff compared to
6 the bigger stuff. But any other questions? Sounds
7 like we need an audit of candidates. I agree with
8 this and actually Kerryn Tatum partners with a guy
9 called California Underground, who does videos and
10 explains to you the weird stuff that is on their
11 spending. Because basically what he's saying is that
12 if you're genuine, you're running for Congress, why
13 are you staying at the Ritz-Carlton?

14 Why are you -- like, in Kim's thing -- in Kim's
15 case, she was staying at the Trump Hotel. She said
16 she was doing a -- not candidate meet and greet, but
17 like a candidate event at the Trump Hotel. Like
18 you're running in Baltimore. The Trump Hotel's the
19 most expensive hotel in DC, or, you know, one of the
20 top two most expensive. Like none of that made any
21 sense, you know, but these are -- it would be good to
22 have people that were dedicated to looking into this
23 stuff.

24 So I'm going to partner with Kerryn Tatum, this
25 guy, California Underground, who I haven't met,

1 because I know they've been trying to expose a lot of
2 this. They haven't gotten, like I -- I should have
3 been blowing people up for a long time. I watch them
4 and I think it's like hilarious that they're calling
5 out all of these people being like, if you're genuine
6 about running, why do you need to stay in a hotel
7 five days a week at the Ritz-Carlton type of stuff?

8 And like I said, I think Blexit, if you go to
9 Blexit.com, we actually have an interactive map
10 already. So I think it would be easy for us to just
11 build it out that feature and just kind of tell you
12 guys what you need to know, highlight the seats that
13 we think are extremely winnable and the seats that
14 are not as likely to be winnable.

15 And by the way, just because it's not likely to
16 be winnable doesn't mean that you shouldn't run. But
17 I do think that if, imagine if we had those \$8.2
18 million, that Kimberly Klacik raised and we had
19 actually allocated to seats that were within just a
20 couple of points of one another. So yeah, I guess
21 that would be it.

22 September is a stage name. Yes. That is what I
23 have been told. And as I said, I spoke directly with
24 the stripper that worked with her. So there was like,
25 you know, she was pretty didn't seem like she liked

1 her very much and was very annoyed at like the whole
2 scam and the hustle of it. Why are there never
3 consequences for these people?

4 I don't know because the majority of people that
5 are criminals are in government, so I guess they
6 figure how do you prosecute the criminals that are
7 trying to get into government? I don't know. That was
8 me just making a joke, but you know, and yeah who --
9 who -- drain the swamp. We need to spend millions for
10 our boots on the ground. I totally agree. Kerry
11 Tatum, 100 percent. There's a lot that needs to be
12 done.

13 Senator Ted Cruz needs to eviscerate Kimberly
14 Klacik for the money laundering, tax fraud, and
15 campaign fraud. Yes. At the very least it warrants an
16 investigation. And like I said, you guys are welcome
17 to look at these FEC filings. Will she be on your
18 show? Nope. She said she's booked to August. She's
19 super busy, I guess.

20 And she's blocked me on everything and she's
21 reached out to like, you know, other people to like,
22 say she's like, oh, we're going to look into you. And
23 I'm like, bro, go for it. I have nothing to hide. My
24 husband is basically the IRS, this guy -- if I am out
25 with -- and I have my Blexit card and I'm going to

1 get myself a coffee, he's like, well, are you on
2 Blexit business? You have no right.

3 So I don't even use my Blexit card. I have
4 nothing to hide. Nothing. Zero percent, except we are
5 doing a Blexit rally in Birmingham this weekend. So
6 if you live in Alabama, please come, it's going to be
7 a fun freedom event. It doesn't matter what color you
8 are, everybody's invited to Blexit rallies. Any other
9 questions?

10 Yes. I mean, obviously Newsmax will make
11 everybody aware of this so that they can all launch
12 their own internal investigations. And by the way, if
13 anything has been debunked, if she's like going to
14 come out and be like, oh no, I know I gave to this
15 business that doesn't really exist, but this is why,
16 I will add that because I'm not trying to, you know,
17 paint her in the wrong light.

18 As I said, I gave her every opportunity to
19 respond. I messaged her privately about this and she
20 gave me no answers and just threatened to sue me and
21 then blocked me. So there was nothing, like she
22 could've just said she could have debunked this
23 privately, this wasn't me trying to like shame her
24 without actually doing -- I -- and I took the
25 basically three days, no longer.

1 I started this investigation during the weekend
2 and yeah -- yeah, it was Tuesday. Yeah. So it took
3 about four days. Thank you so much, Candace, for this
4 much needed. I wish I could be there much love for
5 all of you at the rally this weekend. Thank you so
6 much. Oh, Topher Town Music, he is going to be
7 performing. Yes. He said Angela is commenting. She
8 always is.

9 You're the best. Thank you guys so much. Any
10 other questions that you guys have about the
11 Kimberley Klacik thing? Yes. Liz OANN Newsmax tag
12 them. Also, I think the Baltimore Sun would probably
13 be a good person -- so people just know locally
14 what's going on. And like I said, I hope somebody
15 takes this baton and goes further and just looks more
16 into her FEC filings.

17 And all of us House Conservatives stand up,
18 speak out against the race hustle on the right. Don't
19 be afraid to speak out against people because they're
20 black and conservative because that's a very easy way
21 to protect yourself.

22 And I always expect, you know, people to
23 criticize me. I take it all the time. I know a lot of
24 you guys were like, oh, this is just going to attempt
25 to be like some petty drama. Nope. Talking about

1 fraud, plain and simple. And I am tired of it. All
2 right. Anything else? Nope. I don't believe in -- we
3 don't think -- I don't think we need to cancel Kim. I
4 think we need to investigate Kim. So I'm calling for
5 an investigation.

6 Anybody else? Guys tag me in any more
7 investigations that you do; fec.gov, do it, do it, do
8 it look into more, whatever it is you find, I will
9 share it.

10 Let's clean up the conservative movement from
11 the hustle of constantly running conservatives that
12 have very interesting histories.

13 All right. Say her name September. I gave Kim
14 500. Yikes. Ask for it back? Maybe somebody can do
15 about that? Thank you. All right, guys. I have to go.
16 Bye-bye.

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I, Chris Naaden, a transcriber, hereby declare under penalty of perjury that to the best of my ability the above 43 pages contain a full, true and correct transcription of the tape-recording that I received regarding the event listed on the caption on page 1.

July 14, 2021

Chris Naaden

x Chris Naaden

(Candace Owens on Instagram, 6/22/21)

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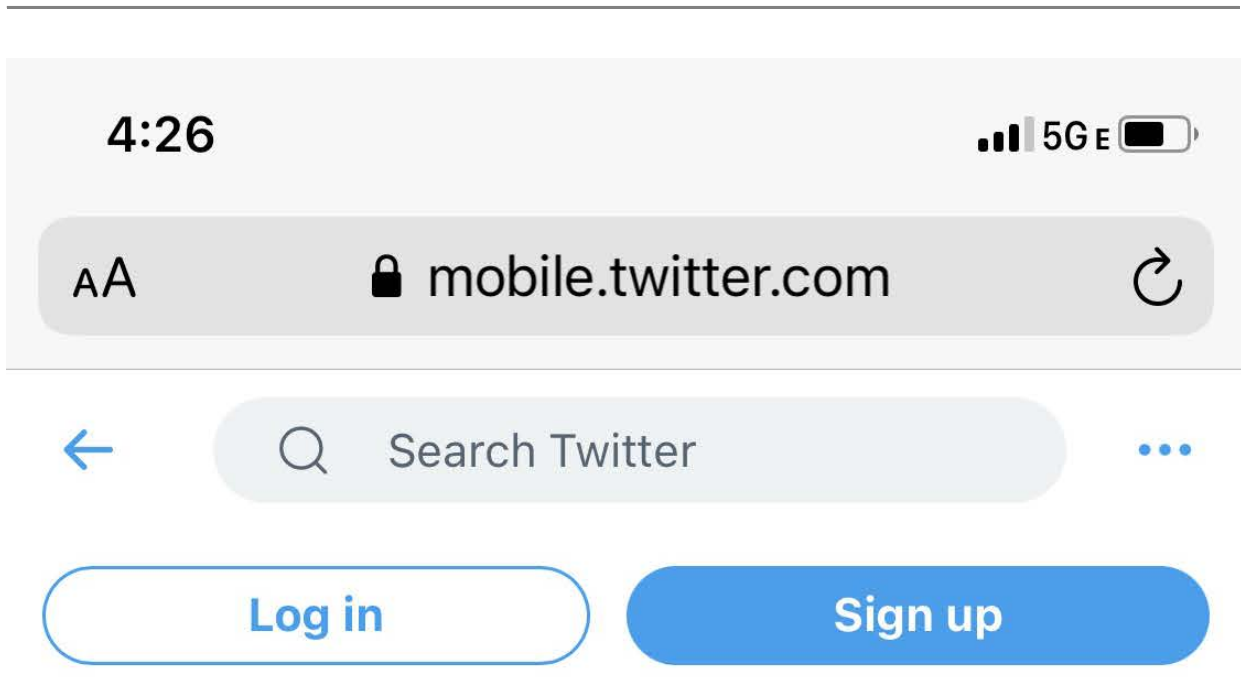
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EXHIBIT #2



Kimberly Klacik 
@kimKBaltimore



"Ms. Owens' allegations against Kim Klacik are offensive, false, and defamatory. Notably, Ms. Owens has failed to provide any factual evidence to support the outrageous claims made in her video. Our attorneys are currently reviewing our legal options against Ms. Owens and The Daily Wire."

138 Retweets **214** Quote Tweets **873** Likes

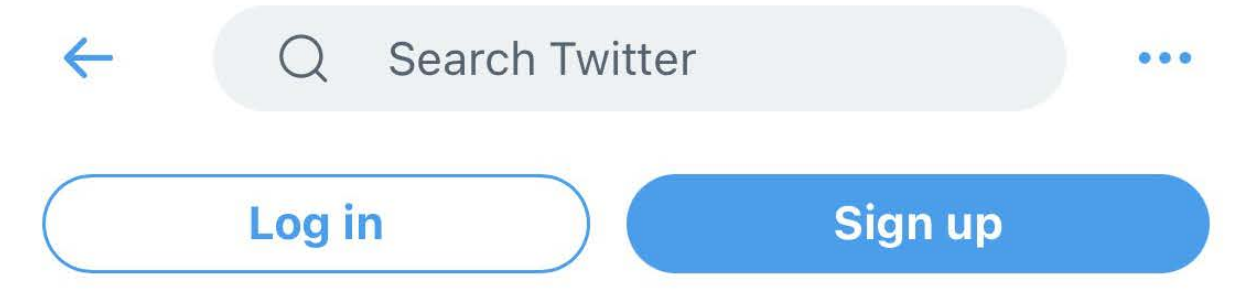
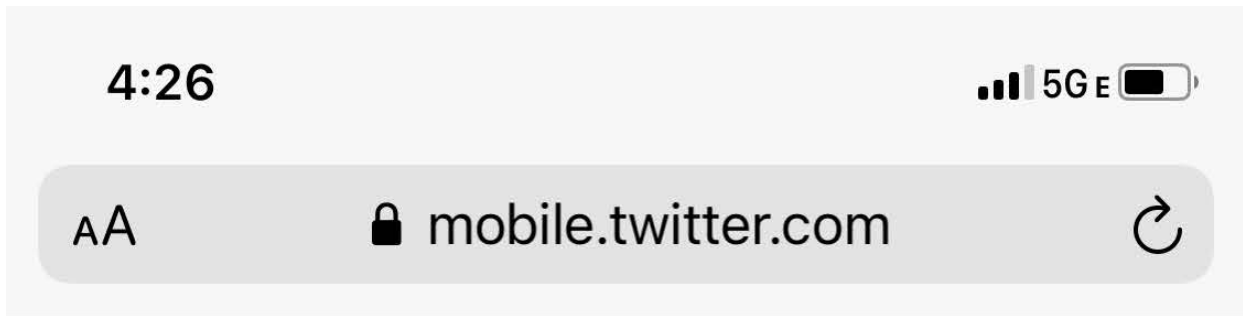


Who can reply?



People @kimKBaltimore mentioned can reply.

EXHIBIT #3



Kimberly Klacik 
@kimKBaltimore



A few people are asking about a video that was put out by an influencer. She has falsely accused me, private citizens & businesses of federal crimes so I would like this to play out in court rather social media. This journalist with zero credentials has no clue on the costs of a campaign and is trying to school folks on something she knows nothing about. Using phrases like "I think", "allegedly", "I can't verify" are important in this matter.

As a vocal conservative leader I am used to being attacked by those who disagree with my views. If this fictional story was just about me I could have already responded with detail, but this social media star crossed the line when she made false allegations with malicious intent against hardworking small business owners who performed significant work for my

campaign and she will be held accountable. Keep in mind I am not under investigation & never have been. To the internet detectives & lawyers, I am taking advice from actual lawyers. I still have obligations as far as appearances & media that I will continue to meet. Nothing has been cancelled because again, I have done nothing wrong.

9:31 AM · Jun 24, 2021 · Twitter for iPhone

158 Retweets

65 Quote Tweets

1,164 Likes



EXHIBIT #4

FORTZ
Legal

KIMBERLY KLACIK

ON THE ARMSTRONG WILLIAMS SHOW

JUNE 26, 2021

"ANSWERING FALSE ACCUSATIONS, LAST TIME I ADDRESS IT"

<https://youtu.be/nXmBgdrx7nY>

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KIMBERLY KLACIK
ON THE ARMSTRONG WILLIAMS SHOW
JUNE 26, 2021
"ANSWERING FALSE ACCUSATIONS, LAST TIME I ADDRESS IT"
<https://youtu.be/nXmBgdrx7nY>

1 MR. WILLIAMS: Hello everyone and welcome to
2 this special edition of the Armstrong Williams Show.
3 We're on, uh, with, um, Kimberly Klacik, uh, who ran
4 for Congressman in Baltimore. And the latest is
5 between she and Candace Owens in this public feud,
6 and she has not said anything as a result of the
7 salacious allegations and this is her first public
8 statement.

9 Kim, welcome to the show. And obviously you're
10 in shell shock from the allegations and the things
11 that are happening in you- -- in your career. Talk to
12 us briefly about what you have to say about all that
13 is going on.

14 MS. KLACIK: Yes. Thank you, Armstrong, first of
15 all for having me today. Um, I am in shock. My family
16 is in shock. We have private citizens and businesses
17 that have been put under fire. They are also in
18 shock, uh, but we have not actually spoken out until
19 now, uh, because we wanted to make sure that we all
20 obtain legal counsel, uh, so that we can move forward
21 the correct way and the intelligent way.

22 Um, but you know, this all started out, uh, from
23 a tweet. Uh, I think there was, uh, some misleading
24 information out there. Some people thought it was
25 from a tweet of, um, Candace's dislike for

1 Juneteenth. That is a lie. That is wrong. Uh, this
2 tweet that was sent out, she said that, uh, something
3 about black people being brainwashed and -- by
4 Democrats and they have to wake up and their
5 communities.

6 I quote, tweeted that tweet and I said, you know
7 what? Black people are not brainwashed. A lot of
8 black people in underserved communities know that it
9 is classism, not racism. Uh, I said sometimes the
10 loudest voices with the loudest platforms, uh, have
11 the biggest mouths.

12 And I said, you know, this might come as a shock
13 to you because of your lack of engagement in the
14 black community. That Armstrong was the tweet. That
15 is what started all of this. And that's why we're
16 here, I guess, at this point today.

17 MR. WILLIAMS: What about the allegations? I
18 don't want to get into this. I mean that you're some
19 kind of an operative for Republicans and their money
20 and you support Democrats, and obviously what you did
21 in your campaign when you ran for office, you wanted
22 to really understand the communities. Uh, and you
23 hired an expert who just happens to be a democratic,
24 uh, operative to sort of help you with the messaging.

25 MS. KLACIK: Correct. Um, if anybody knows

1 anything about running for office, especially a
2 congressional campaign, as you do and so many others
3 do, uh, but this individual Candace Owens does not.
4 You hire a Democrat, uh, that has the voter
5 information, uh, that allows you to see which
6 independence and moderate Democrats are good to
7 target to hopefully go and knock doors, phone calls,
8 to persuade for their vote.

9 It is a D class 30 district that I ran in. You
10 would have to reach the Democrats in order to flip
11 this district. And so we hired, uh, Democrats and
12 Republicans that had this voter information so that
13 we can target everyone that was an active voter in
14 the past five years.

15 And that's usually how this works, but again, if
16 you've never run a campaign, if you never run for
17 office, and you've never worked on a campaign, you
18 wouldn't know that. And that is why I am defending
19 that issue because Candace Owens has never done that.

20 MR. WILLIAMS: You know, I know people who know
21 you very well and they vouch for the fact that you've
22 never been involved with drugs, taking drugs, but yet
23 there's allegations of cocaine use between you and
24 your, uh, ex-husband.

25 MS. KLACIK: Yes. Uh, so my husband and I are

1 estranged. We actually separated in October, uh,
2 before the November elections. This is not something
3 that I talk about because obviously this is a private
4 matter. My husband is a private citizen. He does not
5 like the spotlight whatsoever.

6 He's a certified public accountant. And so she
7 made the allegations that we were laundering money
8 and doing drugs and recruiting, uh, I guess, women to
9 an -- an adult club, uh, which is basically saying
10 that we are, uh, accused of human trafficking. She
11 made all of these allegations about a certified
12 public accountant and a former congressional
13 candidate.

14 She said in this video that she could not verify
15 any of this information. She said that we were
16 partying in a club during the campaign with campaign
17 funds. Uh, Armstrong, if she was the detective that
18 she pretends to be, she would know that all of the
19 clubs in Baltimore City were shut down due to the
20 pandemic in Baltimore. Uh, so there was no possible
21 way anybody was partying in a club were able to
22 launder money into a club that was completely closed.

23 MR. WILLIAMS: You know, I know there are the
24 allegations about your being a former stripper and,
25 you know, people don't understand, all of us have

1 pasts. None of us are perfect. We do things in our
2 lives that we're not proud of, but, you know, we're
3 forgiven and we become better people. You're not the
4 person who you were years ago, you're the person who
5 you are today.

6 MS. KLACIK: Uh, that is true. And you know
7 what, I feel bad for all those young women, uh, that
8 are now out there that probably thought, you know,
9 why would she attack other women, uh, for doing what
10 they can maybe to make ends meet? You know, who is
11 she to tell anybody what job they could or could not
12 do when it is legal?

13 Uh, and -- and, you know, it is legal to be a --
14 an exotic dancer. It's not an illegal job, um, but I
15 feel bad for all those women that currently have that
16 occupation that probably feel attacked right now.

17 MR. WILLIAMS: You know, the main thing we
18 wanted to do was have you on the day, give you a
19 forum, um, to share your perspective instead of not
20 just saying anything. I mean, we wish you well. It's
21 so unfortunate to see two powerful, very accomplished
22 women involved in this kind of feud in the public.

23 There's so few of you who are -- happen to be
24 conservative and who are black and have this
25 substantial pla- -- platforms. And you know what, we

1 live in a country where people are innocent until
2 they're proven otherwise, and you should not lose
3 your way of life because the allegations that have
4 not been proven. We wish you well.

5 Certainly we will continue to have you on our
6 platforms. Uh, we appreciate what you do. We
7 appreciate what Candace Owens does because there's
8 room for both of you and hopefully you can settle
9 this and move on, but we really appreciate your
10 joining the Armstrong William Show today for the
11 clarification.

12 And also, just know that you're in our prayers
13 and our thoughts, and we just hope that people don't
14 just discontinue their association with you because
15 of these allegations. I mean, you have so much to
16 offer and like I said, we wish you well in the
17 future.

18 MS. KLACIK: If I can say one more thing,
19 Armstrong, I just want to say those private
20 businesses that were accused of not being in good
21 standing during the pandemic and the lockdown, all
22 city and state buildings were closed. Uh, that is why
23 they didn't have their standing up- -- updated
24 online.

25 They are in good standing and as COVID

1 restrictions lift, uh, you will see that. It just was
2 not updated online, and so that's the information
3 that she was going off of. Um, and I just hope that
4 all those supporters of mine out there and donors and
5 everybody that support our run and now we're a pack,
6 understand that I am still the same person they have
7 always known to be and is certain that we come to
8 this point, uh, that fake news can be produced as
9 real news. Uh, but you know, I am not that person and
10 they can trust me as usual moving forward.

11 MR. WILLIAMS: Thank you so much, Kim Klacik and
12 we'll be talking to you again in the future. I'm
13 Armstrong Williams.

14 MS. KLACIK: All right. So thank you. Armstrong
15 Williams, very prominent Republican for hosting that
16 interview. I know it's only six or seven minutes
17 long, but that's because it's going out on television
18 as well and so we have to, you know, do what the
19 broadcasters say to do.

20 Um, but I wanted to go ahead and address some
21 more stuff. Um, following this video, you'll actually
22 see we're not following it, but on this video, like
23 as we go in, um, you'll see, Jessi Melton from
24 Florida explaining to you guys how much canvassing
25 costs.

1 Uh, we actually got a really good deal at our
2 canvassing and -- and when I say canvassing, these
3 will answer the questions to why so much money went
4 to Fox & Lion LLC. So definitely, you know, when I'm
5 done talking, it'll go straight into Jessi and you
6 can see all of that for yourself, um, which thank
7 you, Jessi, for explaining that because, you know, I
8 don't have time.

9 Um, so first of all, uh, I know a lot of people
10 were wondering why didn't I come out and answer
11 questions immediately. Um, I'm not very like react on
12 emotions kind of person. Like sometimes I do. You see
13 me on Twitter react emotionally, but I think in this
14 situation where you have like crazy accusations of
15 federal crimes against yourself, you know, your
16 family and other private citizens, like you have to
17 observe. You have to gather. You have to get legal
18 counsel and you have to listen to legal counsel.

19 Um, you know, you can't just start, you know,
20 going out there and be like, oh, I did it. I did it.
21 Like, I think people want to see like this social
22 media fight and that's just not going to happen when
23 it comes to me, right? I'm almost 40 years old. Like
24 it's just not. I'm -- I'm -- I'm a grown woman.

25 And so, you know, when some people ask, but why

1 did you block Candace? Before I blank Candace, I
2 asked her if she wanted to go on Instagram Live and
3 hash out whatever she wanted to hash out. She didn't
4 want to go.

5 She wanted to do it on her show because we all
6 know to watch your show, you have to subscribe, like
7 you wouldn't see it for free, you have to subscribe,
8 um, and then that helps her, you know, with her
9 ratings and -- and it helps her and Daily Wire, you
10 know, get money, right?

11 They need more subscriptions the- -- for people
12 to watch the show. And so that's what that was about.
13 And for me, I said to her, if you're really about,
14 you know, me answering any of these questions, even
15 though you're not a journalist, let's just go on
16 Instagram Live. She refused to do it.

17 I then got a call from a donor that we share.
18 Uh, the donor that we share said, please do not go
19 back and forth with this girl. Um, he said, if you
20 can, just block her. So I blocked her, you know. Um,
21 I didn't think anything of it. Uh, I, you know, they
22 have blocking on social media so you can do it if you
23 want to.

24 Um, she was in my direct messages. I didn't post
25 these just because I -- I don't play that game, but

1 she was direct messaging me like every hour for three
2 days, right? It went from Friday, Saturday, and then
3 Sunday. And then I just made that little short video
4 on Sunday just to address everything she was saying
5 on Instagram.

6 Um, but yeah, I -- I would say, dude, you have a
7 new baby and a husband, and here you are literally
8 direct messaging me all day long for three days
9 straight. So I didn't know what was going on. It was
10 very odd and bizarre behavior to me.

11 And so that donor was like, let her die on this
12 hill alone, so I said, okay, sure. So I think some of
13 the questions that were not answered, if I can run
14 through them real quick, um, Fox & Lion, LLC, like I
15 said, Jessi's going to explain to you how much
16 canvassing costs.

17 Uh, a lot of people don't know how much, uh,
18 campaigning costs and a lot of this -- like I think
19 that's what we see in the story. There are a lot of
20 people ignorant to what it takes to run for office.
21 Um, and so I don't expect everybody to know, right?
22 Like if you're a plumber, I don't know how to do any
23 plumbing. You -- you wouldn't expect me to. Um, so I
24 don't expect you to know how much it costs to
25 campaign.

1 Um, now a couple of things like I said with the
2 money. I never had access to the treasury, right? And
3 so if, you know, if you guys know Eugene, sorry
4 Eugene throwing your name out there, but Eugene is
5 the one that started off with my campaign. Uh, we got
6 into special election and he purposely set it up to
7 make sure that this would not happen.

8 And so I never had access. I could not withdraw
9 cash. I could not wire funds and I could not even
10 write a check. So if I ever said we had to pay for
11 something on the campaign, the treasurer would have
12 to do it themselves. Uh, I did not have that access.
13 So to say that I did money laundering, to say that my
14 husband was involved in money laundering and he's a
15 certified public accountant, um, I can't wait until,
16 you know, his lawyer gets a hold of this whole
17 situation.

18 Um, but that's not something you should be
19 accusing us of doing. Uh, it is absolutely false. We
20 had no access to any of the money. Now, I did notice
21 that she did not even mention that we left close to
22 \$1 million in the bank. Did anybody account for that?
23 No. Because this so-called Instagram investigative
24 journalist is not an accountant.

25 And I just think it's interesting that people

1 are saying, you know, whatever Candace is saying is
2 factual, it's not. I've never been under
3 investigation for anything. I did nothing wrong. Like
4 this is like, it's so bizarre to me that people think
5 Candace Owens in four days did more due diligence
6 than the FEC in an entire year and this is what they
7 do. Like, just think about that part real quick.

8 Uh, Pearl Events, so some people are saying
9 Pearl Events is not in good standing. Pearl Events
10 is in good standing. Fox & Lion is in good
11 standing. Um, a lot of businesses right now in
12 Maryland are in good standing, but it's not updated
13 online, okay.

14 So Maryland and Baltimore, you know, those state
15 and city offices were closed because of the
16 coronavirus pandemic. So everybody getting back to
17 work now, they're all now starting to update their
18 systems. Remember, Governor Hogan declared a state of
19 emergency.

20 Now that it's been lifted, I think it's over on
21 August 15th, um, you should see a lot of those
22 records shift, but people were asking why Pearl
23 Events got \$119,000? If you go to my YouTube channel,
24 you can see that we have our, um, it was our election
25 night party. We actually, yeah, we went live from our

1 election night party on YouTube. That video is still
2 there. We brought up big and rich.

3 Uh, we had an event planner because again, it's
4 an election night party so we could not plan a party
5 and run for office at the same time. Uh, we had cigar
6 rollers, we had goodie bags. We had, uh, Sagamore
7 whiskey came, whiskey tastings. This was a party to
8 host for everybody that volunteered for our campaign,
9 and you guys know we had hundreds of volunteers.

10 So we wanted to make sure that we treated them
11 right. They spent a lot of their time and effort
12 trying to help me win the race. So, yes, I don't take
13 that back. I would still pay that much amount of
14 money for the election party.

15 We had amazing people that worked on our
16 campaign and I wanted to treat them the best that I
17 could and I do not regret it, I will not take it back
18 and I would do it again. So that's that on that. Um,
19 I'm sorry, you know, this is just so crazy to me.
20 Human trafficking, we were accused of. Really, human
21 trafficking?

22 So, you know, the lawyers don't want us to like
23 get into everything, but I was never a madam, like,
24 are you kidding me? Like some of these things, you --
25 you listen to this -- this Instagram Live story and

1 it's like, really? Really? Everything that I do is
2 uploaded everywhere.

3 We even have, if you go to my YouTube channel,
4 you guys probably remember the YouTube series
5 Unbought & Unbossed? I was hooked up to a microphone
6 the last 30 days of my campaign, so I was always
7 mic'd up and I had a camera crew with me the entire
8 time.

9 But now I'm some kind of like drug addict that's
10 going around and hanging out in the strip club and --
11 and taking campaign money and doing it. That is the
12 most wildest and outlandish story I've ever heard.
13 Mind you, all the clubs were closed during my
14 campaign. Again, they were on lockdown. Like it makes
15 zero sense.

16 The pictures that were posted that I see like
17 floating all around, you can find them on my Facebook
18 and on my Instagram. That's where people are taking
19 them from. I don't hide my pictures. Tha- -- it's me.
20 This is my life and I'm fine with it. So again, this
21 is just so crazy to me.

22 Um, the private plane, you can also see that on
23 my YouTube channel. Uh, I actually went down to
24 Georgia when President Trump introduced, uh, the
25 platinum plan rollout. I think we were told maybe 20

1 hours in advance. Again, this is during the
2 coronavirus, not many flights.

3 I mean, if the president invites you to come
4 speak on spa- -- on stage, uh, to present the
5 platinum plan rollout, you're going to go. You're
6 going to go, and you're going to do what it takes to
7 get there. And so the very next morning, I had an
8 event, uh, in Montgomery County that Montgomery
9 County Central, uh, Committee can tell you.

10 Um, and so we were trying to race back as fast
11 as we could to still have that obligation in
12 Montgomery County. The problem was, uh, the president
13 was actually late to the platinum plan rollout and so
14 by the time we got to the tarmac and got out of
15 there, uh, we were too late which was unfortunate,
16 but, you know, we made it up to, uh, this -- the
17 Montgomery County Committee after that.

18 But that is why we did that. It was all about
19 getting out there and -- and doing what we had to do.
20 This wasn't like me taking luxury flights, just
21 hanging out, um, that wasn't a thing. But you could
22 actually go to my YouTube channel and see the day
23 that I went to do the platinum plan rollout in
24 Georgia. You could see me walking down the tarmac.
25 You can actually see the whole behind the scenes and

1 why we did it the way we did it.

2 Um, it -- it's available for everybody to see.
3 Uh, you know, th- -- the crazy part about this, I
4 know a lot of people want to hear about the money,
5 oh, the Democrat operatives, which is really weird to
6 say. So this is probably what hurt us the most, and
7 then I don't need to go through all that, but this is
8 what hurt us the most.

9 We had Democrats, um, in Maryland district
10 seven, especially in Baltimore willing to help us
11 with our campaign to target Democrat voters. When
12 you're running in a Democrat district, you have to
13 target Democrats to flip that district. If I didn't
14 target Democrats, if I didn't try to flip the, uh,
15 Democrat votes, then you could call me a fraud. Then
16 clearly, I'm not trying to win.

17 You have to strategize, right? When you run a
18 campaign. You have to know that you -- you have to
19 know, basically flipping the district, uh, is going
20 to take you messaging, reaching out, phone calls,
21 canvassing in Democrat territory.

22 If you don't do that, you're not going to win
23 and so we ran to win. And so it's interesting that a
24 lot of people don't know that you do that, and that
25 just shows you how many people in the GOP, um, aren't

1 really serious about flipping these districts. That -
2 - that's really what we uncovered here.

3 The damage that's done is now those Democrats
4 that were helping us, uh, that she wanted to name,
5 um, in her Instagram Live video, uh, they're not
6 going to help us now because they're probably afraid
7 that this is going to happen again. So what it did
8 really, uh, was basically take away a lot of the work
9 and the progress that we made in district seven. Uh,
10 that's the unfortunate part.

11 You know, I have candidates in Red Renaissance
12 and we're trying to flip districts across the country
13 and a lot of them are in inner cities. And so now,
14 you see this thing come out, um, that now Democrats
15 can completely attack us, and, uh, I just feel bad
16 for everybody else that's involved because, you know,
17 those candidates don't deserve this. I don't deserve
18 this.

19 Um, I don't know why, you know, me saying in a
20 tweet, you have a lack of engagement in the
21 community, would make her go above and beyond. I
22 don't know. Um, but now I think, you know, a lot of
23 the progress that we made has just been reeled back.

24 When I blocked Candace, I got a phone call from
25 the donor that said, please block her. She looks

1 nuts. Uh, we actually share that donor and he's
2 pulling out support for her because of her antics
3 this past week. Uh, you can look it up if you want.
4 There are Blexit chapters now being dissolved, um,
5 because she basically said that she doesn't want to
6 support, you know, what she calls unwinnable
7 districts.

8 And a lot of those unwinnable districts are in
9 predominantly black areas. And so if your mission
10 with Blexit was to flip, uh, you know, Democrat
11 voters in black areas, um, what are you talking
12 about? You know, this literally, what's the purpose
13 of Blexit if you're basically saying, hey guys, don't
14 donate to these candidates, um, that are Blexit-ing,
15 you know, or that would help these areas, you know,
16 Blexit, as she says.

17 Um, so it makes no sense. Uh, and so you could
18 see the chapters are dissolving, we're getting phone
19 calls from people that work at, you know, Blexit
20 chapters that now want to join our movement because
21 they're saddened, uh, by the comments that were made
22 by she and Corinne Tatum, um, saying that they're --
23 they don't think that people should help, uh, you
24 know, minority candidates in these areas that are
25 deeply blue.

1 Uh, that was probably really sad to see for a
2 lot of people. And you know what, I'm so sorry that
3 if you signed up for Blexit hoping to carry out that
4 mission that you see now that that's not what your
5 founder intended at all. Um, it's sad.

6 Um, I think that covers everything. Uh, I know a
7 lot of people were saying, you know, why did you post
8 a drug test? Uh, again, I work with donors that are
9 millionaires and these people want to throw support
10 behind my candidates in Red Renaissance. Um, of
11 course, you want to make sure that your donors know
12 that you're not on drugs as you've been accused of
13 doing drugs.

14 And so, yes, I thought that was very relevant to
15 this story. Um, you know, I think this whole thing
16 was to take a swipe at my career, obviously, and to
17 swipe back, you know, the donor class has been
18 helping us.

19 Um, you know, luckily a lot of donors reached
20 out and said, we don't buy the story and we support
21 you 100 percent. I'm on my way to Orlando now. My
22 event has not been canceled. Um, I'll be on a panel
23 with Congressman Byron Donalds, and I'm going to go
24 back to life as usual.

25 If you feel that anything doesn't add up and

1 there's nefarious, uh, action here, um, you know,
2 call for an investigation. Ask somebody to
3 investigate me. Call the authorities. I've never been
4 under investigation because I haven't done anything
5 wrong. I've never had access to the money.

6 There is no evidence of money laundering from
7 anyone, not even my treasurer. Um, and we left close
8 to \$1 million in the bank. Uh, you know, I didn't pay
9 myself a salary which you would have saw if you
10 looked at my FEC report. Uh, many candidates do
11 especially when they raise that much money.

12 Um, and so I'm so sad that it has taken, you
13 know, all of this to address this, but hopefully, you
14 know, this answers questions. If not, I don't know
15 what to tell you. We have a lot of people, you know,
16 working behind the scenes as far as lawyers, um, and
17 I'm going to let them handle this moving forward.

18 Um, but I'm going to get back to work. You know,
19 I want to flip the house in 2022 and I want to help
20 candidates across the country. Uh, this is not about
21 me. This is about the Republican Party, uh, and us
22 taking back the house. So either you're on board or
23 you're not, you know, I don't know why we would take
24 allegations as truth, but, uh, it was very sad to see
25 this transpire the entire week.

1 And I'm -- I'm starting to think that we have a
2 lot of sheep in our party, even though we talk about
3 sheep on the left, uh, because there were a lot of
4 people that were manipulated in this situation by
5 fake news. Um, but I hope you all have a great week.

6 Female Speaker 2: In Candace's video and in
7 several messages that I've gotten from people who
8 have never run for office before and don't understand
9 how campaigns work, what happens is, when you get to
10 the end of your campaign, that's when everything
11 counts. So you spend however much time you can
12 raising as much money as you can. Why?

13 Because you have to pay for all the people that
14 are going to contact your voters and all the
15 different ways that they're going to do that. It's
16 marketing. You got to send them text messages,
17 multiple text messages to thousands of people. In my
18 district, I think we had, I don't even remember,
19 36,000 people.

20 Kim's may have been a little more, um, and those
21 are people that you have to touch just in a primary.
22 Now, when you go to the general, it's like four times
23 that much, if not five times that much. So think
24 about sending seven cents a text message, all of
25 those people, you've got to touch them seven or eight

1 times to get name recognition.

2 Then you have Facebook ads. You can geotarget
3 those. Those are also expensive. Um, I'm not going to
4 share all my secrets to marketing because right now
5 we're about to overturn the school board in Palm
6 Beach County using a strategy similar to this.

7 But anyway, mailers cost some money. All of the
8 marketing at the end of the campaign, you have to be
9 signs, staff, people to run this and there's
10 something called canvassers. I hired them in my
11 campaign and what they do is, mail in ballots start
12 going out about 45 days prior to the election.

13 So six weeks prior to an election, maybe 8, 10
14 weeks prior to election, you start touching voters
15 over and over and over again because they have to
16 remember your name when they get to the ballot box.
17 Congress is not always top of mind. A lot of people
18 don't pay attention to our world.

19 So you send canvassers out. They start door
20 knocking in a district. You're talking about multiple
21 counties, tens of thousands of people, sometimes
22 hundreds of thousands of people that costs money.
23 There are companies that are great at ground game.

24 A lot of time, their local community
25 organizations, uh, they can cross lines, believe it

1 or not. They can work for either party. They really
2 don't care. You got college kids or people working
3 for minimum wage. They don't care what t-shirt you
4 put on them or what party you stand for, they're
5 there to make some money.

6 And they walk around and they knock on doors and
7 they talk to people and they leave door hangers.
8 That's how you have to outsmart the voter fraud or
9 not the voter fraud rather, the USPS fraud, where
10 mailers get sent out after your election like they
11 did in mine so you send canvassers out. It's not
12 cheap.

13 At the end of your campaign so you're sending
14 these canvassers out all the way up until the day of
15 the election. You're s- -- people are still knocking
16 on doors, standing at voter precincts, putting out
17 signs, removing signs all the way until election day,
18 right? The job's not done. After election day,
19 invoices come in for months of services.

20 Sometimes hundreds of canvassers. Sometimes
21 dozens of canvassers, whatever it is. In my case, in
22 my campaign, after my campaign was over, probably the
23 two to three weeks if you go look on my campaign FEC
24 report, I paid several individuals who were out
25 canvassing for me.

1 I paid individuals that hired other individuals
2 that were out canvassing for me. Sometimes you do it
3 through an LLC. Sometimes you do it directly. It
4 depends on what the level is. So in conclusion, Kim -
5 - Kim's campaign raised a lot of money and she had a
6 lot of ground to cover.

7 And mind you, she didn't steal money from
8 donors. This isn't taxpayer money. Donors gave her
9 this money to spend as she saw fit to help the
10 country, whether that was to win this election, or
11 the next one, or to do what she's doing now which is
12 helping a lot of other little guys get exposure and
13 win elections.

14 Kim is a hard worker and she's helping the
15 little man. I can't say the same for the other two.
16 At the end of a campaign, you close out all you owe
17 everybody. In my particular case, I had to pay off
18 the data people that provided the data. I had to pay
19 the people that sent out the text messages. I had to
20 pay the companies that did my digital advertising. I
21 had to pay my canvassers. So there are people
22 that are taking what Candace, somebody who doesn't
23 understand campaigns says, and they don't understand
24 it and this is a perfectly legitimate explanation for
25 that. And I think that a lot of little things are

1 being brought together and woven into a story to, I
2 guess, feel some sort of deep rooted insecurity.

3 Um, and I don't want to bash anyone here because
4 I do -- I'm not going to lie, I have a lot of respect
5 for Candace. I always have. This, she's on her worst
6 behavior, that's it. I'm not going to lie. Um, but
7 ultimately, it is normal to pay canvassers large sums
8 of money after your campaign. That's when you start
9 paying everybody and getting stuff off the books.

10 I can tell you after Kim's campaign, she also
11 reserved and kept -- it was at least over \$2 million.
12 I can't remember because I don't study her campaign
13 finance reports. It was at -- at least over \$2
14 million. I think she still had \$2.8 million left if I
15 remember correctly or it was 4.2, something like
16 that.

17 I know that's a big difference, but she still
18 had a lot of money left and she rolled some of it
19 over into her pack and is helping other candidates.
20 She didn't go gobble it all up. By the way, there was
21 some sort of accusation that came from hearsay from a
22 stripper which Candace has a legal background and has
23 been in litigation before.

24 So Candace should know that hearsay from a
25 random stripper that she found is not a lemigi- -- a

1 legitimate news source. Let's not be like the other
2 side. Candace called some stripper who knows how she
3 -- how this stripper felt about Kim, who knows if the
4 woman was on drugs or not. This woman makes a claim
5 that Kim's in there partying and doing drugs, uh,
6 after her campaign.

7 Mind you, this is in Maryland. Clubs were shut
8 down including strip clubs during this time, okay? So
9 don't just take everything Candace is saying as
10 gospel because she has been correct on a lot of
11 things. There are a lot of things that I agree with
12 her with.

13 And there are a lot of things -- there are
14 several issues with Kim that I don't necessarily
15 agree with, but taking advantage of people who don't
16 understand campaign finance and don't understand how
17 campaigns work, and taking all these pieces and
18 trying to weave them together to point someone out as
19 a "bad person" is wrong.

20 It's ungodly, it's deceptive, it's manipulative
21 and Candace needs to repent from it. Now, I don't
22 know how strong Kim's legal cases I can tell you
23 right now that Candace knows her way around, again,
24 around the legal system so -- so she knows how to put
25 things together without getting herself in a

1 situation where she could be sued for defamation.

2 You have to have certain elements in order to
3 prove defamation. I know this because I was sued
4 during my campaign. What Candace is doing to Kim
5 happened to me during my campaign on a smaller scale
6 and it's really dirty and it's really nasty. And it
7 was Republicans that did it to me that were really
8 nasty and really jealous. And I'm sorry, but that's
9 exactly what I see again happening now on a larger
10 scale.

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2
3 I, Chris Naaden, a transcriber, hereby declare
4 under penalty of perjury that to the best of my
5 ability the above 28 pages contain a full, true and
6 correct transcription of the tape-recording that I
7 received regarding the event listed on the caption on
8 page 1.

9
10
11 July 16, 2021

12 Chris Naaden

13
14 *x Chris Naaden*

15
16 (Kimberly Klacik on the Armstrong Williams Show,
17 6/26/21)

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EXHIBIT #5

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Thursday, June 24, 2021

Ms. Owens,

We are counsel to Kimberly Klacik. It has come to our attention that you have published false and defamatory statements regarding our client. While Ms. Klacik is a conservative leader who appreciates diversity of opinion and First Amendment protections for opinion, your publication of numerous false statements of fact asserting that Kimberly Klacik is engaging in money laundering, misuse of campaign funds for personal financial gain, illegal drug use, and sex recruitment, crosses the line from opinion to defamation. These direct allegations that Ms. Klacik has participated and is still participating in criminal activity are defamation *per se*.

We respect your right to continue your barrage of personal criticism of Ms. Klacik, but in this particular case you must cease and desist from publishing malicious lies about Ms. Klacik. You stated as a fact—with no factual evidence—in a video posted to your Instagram account that Ms. Klacik “used campaign money to do cocaine,” engaged in “money laundering” by paying vendors that “support her personal lifestyle,” was a “madam” that recruited strippers for her estranged husband’s strip club, and scammed people from “millions.” All of these allegations are false, and you must immediately cease and desist from perpetuating these lies.

The Facts

On June 22, 2021 you published a forty four minute video on your Instagram account (“the Video”) that makes a variety of salacious, offensive, and defamatory allegations against Ms. Klacik without providing any evidentiary support for your claims.¹ Specifically, after supposedly conducting a “four day investigation”, you stated that unidentified sources told you that Ms. Klacik “used campaign money to do cocaine,” that Ms. Klacik was a “madam,” that you suspect “money was laundered” from Ms. Klacik’s congressional campaign account to certain vendors “in order to move money from the books,” and that Ms. Klacik and her estranged husband scammed people of “millions” of dollars.

¹ Candace Owens (@realcandaceowens), Instagram (June 22, 2021), *available at* <https://www.instagram.com/p/CQcQ-oEpM-V/>.

All of the above allegations are false. Ms. Klacik has expressly denied all allegations made in the Video and there is no evidence or public information that supports any of the above claims. Any statement indicating otherwise is categorically false, as you yourself have admitted that you have no factual evidence to verify these claims.

Defamation Per Se

In Maryland, "[a] defamatory statement is one 'which tends to expose a person to public scorn, hatred, contempt or ridicule, thereby discouraging others in the community from having a good opinion of, or associating with, that person.'" *Hosmane v Seley-Radtke*, 227 Md. App. 11, 20-21 (2016), *Batson v. Shiflett*, 325 Md. 684, 722-23 (1992). Defamation per se occurs when the words or actionable conduct are so injurious that the harm the words cause are "a self-evident fact of common knowledge of which the court takes judicial notice and need not be pleaded or proved." *M&S Furniture v. De Bartolo Corp.*, 249 Md. 540, 544, (1968).

Maryland classifies a statement which falsely charges a person with the commission of a crime as defamatory *per se*. *A. S. Abell Co. v. Barnes*, 258 Md. 56 (1970). There is no dispute that you accused Ms. Klacik of commissioning numerous criminal offenses, as you yourself classified the activity as "crimes." Therefore, your false assertions that Ms. Klacik has engaged in illegal drug use, was a "madam," misused campaign funds for personal financial gain, and is participating in a money laundering scheme with her estranged husband are each separate counts of defamation *per se*.

Actual Malice

In *New York Times v. Sullivan* 376 U.S. 254 (1964), the Supreme Court held that for a public figure to sustain a claim of defamation or libel, the First Amendment requires that the plaintiff show that the defendant knew that a statement was false or was reckless in deciding to publish the information without investigating whether it was accurate.

Maryland law requires any action brought based upon a communication involving a public official be sustained by clear and convincing proof that the defamatory falsehood was published with knowledge that it was false, with reckless disregard for the truth, or with obvious reason to distrust either the accuracy of the statement or the source from which he or she learned of the statement. *Hanlon v. Davis*, 76 Md. App. 339 (1988). Damages are presumed when a plaintiff can demonstrate actual malice, by clear and convincing evidence, even in the absence of proof of harm. *Samuels v. Tschechtelin*, 135 Md. App. 483, 549-550 (2000).

Numerous comments in the Video demonstrate that you made these accusations against Ms. Klacik with actual malice. It is obvious, through your own comments, that you made these allegations with a reckless disregard for their truth. You explicitly stated that the "only reason" you decided to conduct this so-called "investigation" into Ms. Klacik was because of a "petty Twitter feud" you engaged in with her.² You also knew that these allegations were going to "paint her in a bad light" and still chose to publish with story. Most importantly, you knew that you "had no way to verify," and "could not confirm" any of the allegations made against Ms. Klacik, but you still chose to present this unverified "information" as fact to your millions of followers.³ You are now on notice that such statements are false and any repetition of the claim would be malicious and legally actionable.

² Candace Owens (@realcandaceowens), Instagram (June 22, 2021), available at <https://www.instagram.com/p/CQcQ-oEpM-V/>.

³ *Id.*; see also James Crump, *Candace Owens vs. Kimberly Klacik—Why the Two Black Female Conservatives Are Feuding*, NEWSWEEK (June 23, 2021).

Demand

We hereby demand that you immediately cease and desist from any further publication of your false claims referenced throughout this letter as well as demand you immediately remove the slanderous Video from Instagram to correct this false claim. In addition, you are now on notice regarding your legal obligation to cease and desist from making false factual claims about our client, Ms. Klacik. We understand and respect your right to engage in petty Twitter feuds and express your personal and/or political differences with her, but you may not make up and publish false factual claims.

Preservation Obligations

In light of the legal obligations at play here, we demand that you affirmatively preserve, and not destroy, delete, hide or misplace documents and materials of all kinds, without limitation regarding the creation of the Video. Please also instruct your employees and/or agents, as well as *The Daily Wire* and its agents to immediately implement litigation document holds regarding communications and verification of the factual claims in the Video.

Please respond to me directly at 202-466-5964 or cspies@dickinsonwright.com within 48 hours to confirm your compliance with these demands.

Sincerely,



Charlie Spies
Katie Reynolds
Counsel to Kim Klacik

CC: The Daily Wire
Attn: Jeremy Boreing and Caleb Robinson
15021 Ventura Blvd. #503
Sherman Oaks, CA 91403

EXHIBIT #6



INTERNATIONAL SQUARE
1825 EYE STREET, NW, SUITE 900
WASHINGTON, DC 20006
TELEPHONE: 202-457-0160
FACSIMILE: 844-670-6009
<http://www.dickinsonwright.com>

CHARLIE SPIES
CSpies@dickinsonwright.com
202.466.5964

Friday, June 25, 2021

Mr. Noah Balch
Katten Muchin Rosenman LLP
2029 Century Park East
Suite 2600
Los Angeles, California 90067-3012

VIA EMAIL: noah.balch@katten.com

Mr. Balch,

We are counsel to Kimberly Klacik. We have received an e-mail sent by your Client, Candace Owens, regarding a Cease and Desist letter (hereinafter “the Letter”) we sent to her regarding a video posted by her on her Instagram account (hereinafter “the Video”) that made a variety of false statements regarding Ms. Klacik. Specifically, Ms. Owens made allegations that Ms. Klacik misused campaign funds, used illegal drugs, engaged in sex recruitment, and laundered money. These direct allegations that Ms. Klacik has participated and is still participating in criminal activity are defamation *per se*.

In Ms. Owens response to the Letter, she conspicuously avoided responding regarding the above statements of fact she made about Ms. Klacik. Instead she used straw-men that were not the issue of our letter. While Ms. Owens claims that her statements were either “opinions” or “backed by truth,” this is inaccurate. Ms. Owens, of course, has a right to her personal opinions, but the above statements were not opinion-based statements; they were factual allegations of criminal activity. Additionally, her statement that the facts presented in her video were “backed by truth” interests us, as she has failed to provide any supporting evidence for the above claims. It is worth noting that your client has posted several images on her social media platforms of her correspondence with our client, as well as other “proof,” such as FEC reports, but has still not provided *any* supporting evidence to directly address Ms. Owens’ numerous statements that Ms. Klacik was participating in a variety of criminal activity.

Your Client states that her “investigation” was regarding Kim Klacik for Congress’s FEC reports and that she has “EVERY right under the law to inquire about campaign finances.” To be entirely clear, there is no dispute that she has the right to inquire about campaign finances, as FEC reports are public record. In fact, there was zero mention of Kim Klacik for Congress’ FEC reports in the Letter. If Ms. Owens read the Letter, it would be abundantly clear, given that we

mentioned it numerous times in the Letter, that the concern is regarding her defamation *per se* of our client through direct allegations that Ms. Klacik “used campaign funds to do cocaine,” engaged in “money laundering” by using Kim Klacik for Congress to pay certain vendors “in order to move money from the books,” was a “madam,” and scammed people of “millions” with her estranged husband. These allegations of criminal activity, without a shred of supporting evidence to verify those claims, cross the threshold of defamation *per se*. *A. S. Abell Co. v. Barnes*, 258 Md. 56 (1970).

These allegations were also made with a reckless disregard for their truth, which is considered “actual malice” under Maryland law. *Hanlon v. Davis*, 76 Md. App. 339 (1988). Your client’s admitted “only reason” for conducting this so-called investigation into Ms. Klacik was because of a “petty Twitter feud.”¹ She also admits to having only spent “four days” investigating the claims made in the Video, and nonetheless has still failed to find and produce any supporting evidence for her claims. Most importantly, she knew that she “had no way to verify,” and “could not confirm” any of the allegations made against Ms. Klacik (given that she not only admitted as such in private correspondence to our client but also admitted it publicly on the Video) but still chose to present this unverified “information” as fact to her millions of followers.²

As we stated in the Letter, we respect your client’s right to continue her barrage of vitriol towards Ms. Klacik, but in this particular case your Client’s actions crossed the threshold from a “petty Twitter feud” into publishing malicious lies about Ms. Klacik. Your Client’s statements of fact—with no verifiable evidence—that Ms. Klacik “used campaign money to do cocaine,” engaged in “money laundering” by paying vendors that “support her personal lifestyle,” was a “madam” that recruited strippers for her estranged husband’s strip club, and scammed people from “millions” is defamation *per se* and she is on notice that these claims are false.

Please confirm whether your Client will cease from making the above false statement and/or remove the Video from social media platforms. Absent that confirmation, we will explore all legal options to protect our client from the reputational harm of lies. Should you or your client have any questions regarding the content of this letter, please respond to me directly at 202-466-5964 or cspies@dickinsonwright.com.

Sincerely,



Charlie Spies
Katie Reynolds
Counsel to Kim Klacik

¹ Candace Owens (@realcandaceowens), Instagram (June 22, 2021), available at <https://www.instagram.com/p/CQcQ-oEpM-V/>.

² *Id.*; see also James Crump, *Candace Owens vs. Kimberly Klacik—Why the Two Black Female Conservatives Are Feuding*, NEWSWEEK (June 23, 2021).

EXHIBIT 7

From: Candace Owens
To: [Katherine N. Reynolds](#)
Cc: [Noah R. Balch](#); [Charles R. Spies](#)
Subject: Re: EXTERNAL: Re: Cease and Desist Letter
Date: Saturday, June 26, 2021 1:57:40 PM

I will not be removing any of the videos. I already told you that. I have read your letter. Once again, you are intentionally failing to produce the full sentences of what I said because you know the full context removes me from your claims of defamation per se. I told the truth of regarding what was told to me from a former stripper who worked with Kimberly.

Let me reiterate— I will not removing any of the videos.

Candace Owens

On Jun 26, 2021, at 9:52 AM, Katherine N. Reynolds <KReynolds@dickinsonwright.com> wrote:

Mr. Balch,

Please see attached. Please also confirm whether your Client will cease from making the referenced false statements and/or remove the referenced Video from social media platforms. If you have any questions regarding the content of this letter, please let us know.

Best,

Katie Reynolds
Counsel to Kim Klacik

Katherine N. Reynolds Associate Attorney

International Square Phone 202-659-6944
1825 Eye St. N.W. Fax 844-670-6009
Suite 900 Email KReynolds@dickinsonwright.com
Washington, D.C. 20006
[<image8792f9.JPG>](#)
[<image9d6bfc.JPG>](#)

[<image81fc31.JPG>](#)

From: Candace Owens <candaceoh@candaceowens.com>
Sent: Thursday, June 24, 2021 5:26 PM
To: Katherine N. Reynolds <KReynolds@dickinson-wright.com>
Cc: Noah R. Balch <noah.balch@katten.com>
Subject: EXTERNAL: Re: Cease and Desist Letter

Katie,

Please do not waste your time.

Foremost— copying Dailywire on this correspondence shows that you have done little research into the matter at hand. I made statements on my Instagram account which has nothing to do with the Dailywire.

Separately— nothing I said in my video constitutes defamation of character. I was very clear that a former stripper that worked with Kim made the allegation (in writing to me) that she used the campaign money to do drugs and that I could not independently verify that claim.

You may not be aware, but truth is an absolute defense against defamation of character. You have intentionally not included any of my full sentences from the video below because you know that they immediately separate my opinion from fact. All facts I made are backed by truth. All opinions I made are my own. It is worth noting that I asked your client to respond to my questions multiple times in private and she refused to— which removes me from meeting any standard of “actual malice”. I also attempted many times in private to discern the truth by contacting her campaign manager and treasurer with the questions.

The FACT is that your client, according to her FEC filings, sent over \$119,000 to a business that is defunct and refuses to provide any information as to why that may be. The FACT is that she sent near \$275,000 to a business that is not on good standing and she refuses to answer any questions as to why that may be.

You are attempting to violate my first amendment right and as a registered voter— I have EVERY right under the law to inquire about campaign finances.

If this is confusing to you in any way, please let me know. If your client intends to litigate this matter further— my lawyer is in copy.

In short, you can communicate to your client that I will not be intimidated.

Candace Owens

On Jun 24, 2021, at 12:03 PM, Katherine N. Reynolds
<KReynolds@dickinson-wright.com> wrote:

Ms. Owens—

See attached for important legal correspondence. You will also be receiving a copy of the attached letter in the mail. Please confirm receipt within forty eight hours.

Best,

Katie Reynolds
Counsel to Kimberly Klacik

Katherine N. Reynolds Associate Attorney

International Square Phone 202-659-6944
1825 Eye St. N.W. Fax 844-670-6009
Suite 900 Email KReynolds@dickinsonwright.com
Washington, D.C. 20006
[<image39c068.JPG>](#)
[<image8e7a4d.JPG>](#)

[<image1ba0ab.JPG>](#)

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Neither this transmission nor any attachment shall be deemed for any purpose to be a "signature" or "signed" under any electronic transmission acts, unless otherwise specifically stated herein. Thank you.

<Candace Owens Cease and Desist Letter.pdf>

The information contained in this e-mail, including any attachments, is confidential, intended only for the named recipient(s), and may be legally privileged. If you are not the intended recipient, please delete the e-mail and any attachments, destroy any printouts that you may have made and notify us immediately by return e-mail.

Neither this transmission nor any attachment shall be deemed for any purpose to be a "signature" or "signed" under any electronic transmission acts, unless otherwise specifically stated herein. Thank you.

<Letter to Noah Balch on Cease and Desist Candace Owens.pdf>

EXHIBIT #8



Kimberly Klacik's Post



doings. Until there is proof...actual proof, give it a break!

6h Like Reply Message

1



Donna LaLomia

[Brenda Gray Nelson](#) my thread says rest ????

6h Like Reply Message



Jess Marie

[Candace Owens](#) how much time do u have on your hands that u can scan posts of ppl you don't like and love negative comments against that person ?

Grow up !

5h Like Reply Message

1



Melinda Cutter-Ruth

Andy Pierre have You been to one of those rallies? I was and there are plenty of minorities there.

5h Like Reply Message

Most Relevant is selected, so some replies may have been filtered out.



David Sisson

Jess Marie exactly Candace is even following this post and liking comments that are bashing Kimberly, that seems a little fishy I have pictures of it. That's what got me suspicious. Is Candace just trying to cash in on ratings for her new show. Kimberly redresistance could be cutting into blexit money/donations?

5h Like Reply Message



Jess Marie

[David Sisson](#) is she ? Wow if she is that's extremely childish

5h Like Reply Message

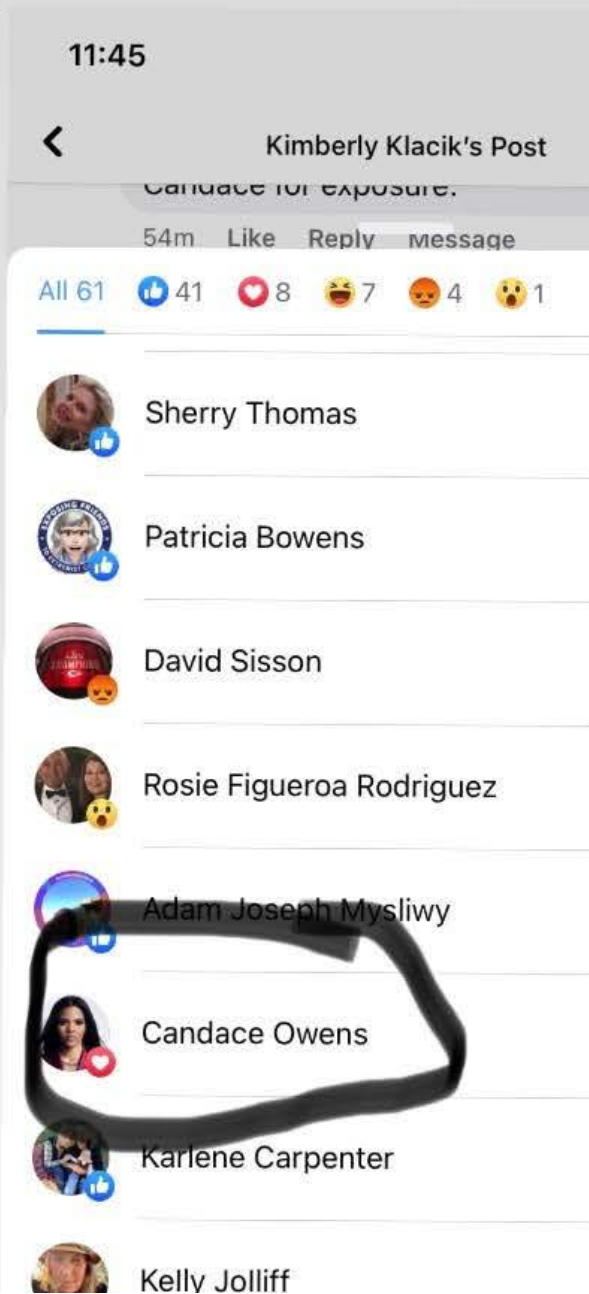
Most Relevant is selected so some replies may

EXHIBIT #9

IMAGINE GOING ON MY FACEBOOK PAGE & LIKING NUMEROUS NASTY COMMENTS THROWN MY WAY DUE TO ALL OF THE FALSE ACCUSATIONS & LIES YOU SPREAD ABOUT ME?

MANY PEOPLE ON FACEBOOK TRULY BELIEVE I STOLE THOUSANDS OF DONOR DOLLARS BECAUSE OF THIS GIRL. WHICH IS A FLAT OUT LIE. I EVEN DECLINED A SALARY.

I HAD NO IDEA
@REALDAILYWIRE "LIKED" HARASSMENT.
@OFFICIALBENSHAPIRO
@MICHAELJKNOWLES THIS YOUR STAR? A WOMAN THIS IMMATURE & MEAN



SPIRITED?

@MYONE82Z



Erin K. Pitts



Cathy Jarrell

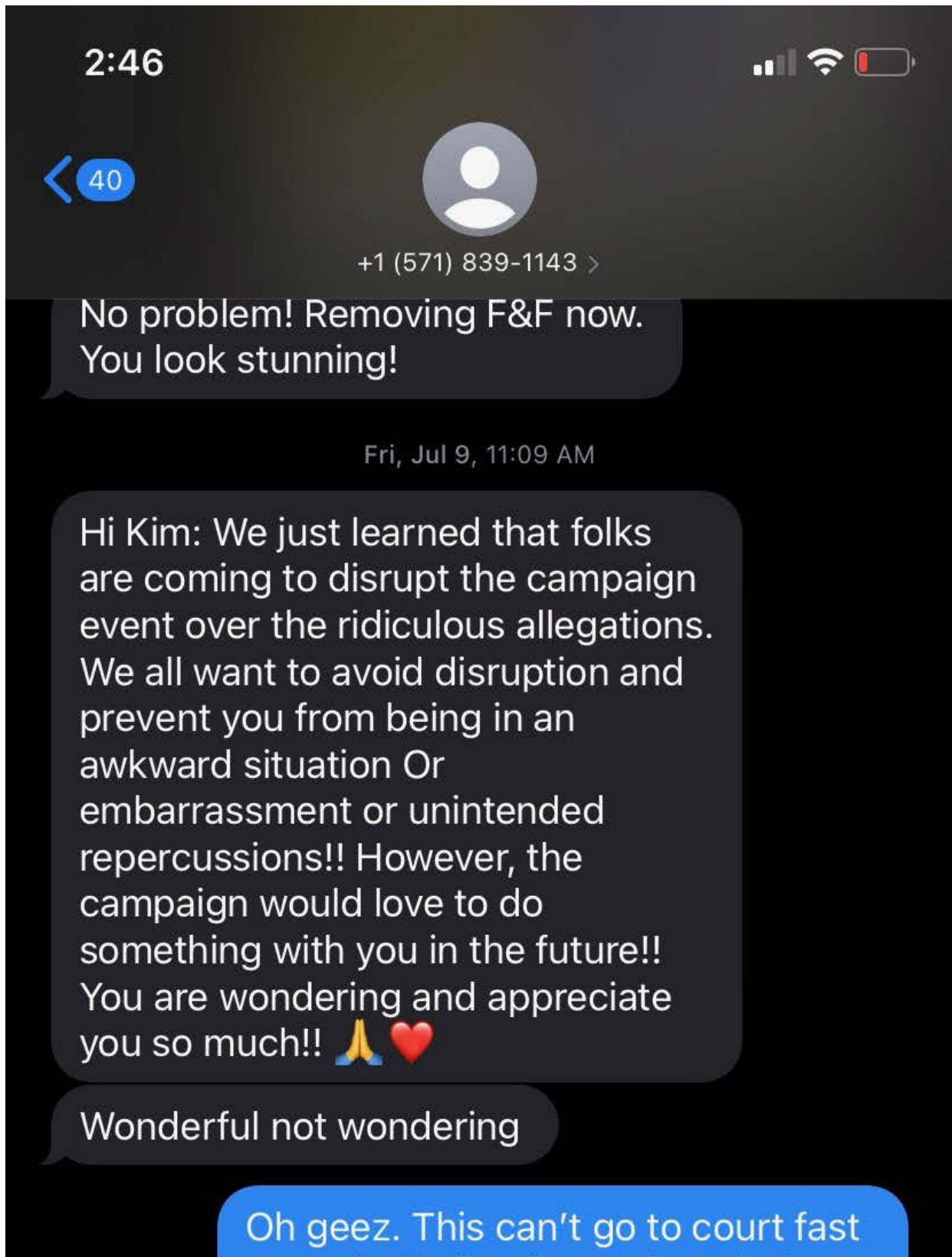


Alirio Martinez Jr

EXHIBIT #10



EXHIBIT # 11



enough. My legal team is on it & we should have a lawsuit against her by next week. I totally understand. It is amazing how someone can make up an entire story and then end it with I can't verify any of it but still push it as fact based. I will sue her for everything she has at this point. Sorry to put you in such a horrible situation.

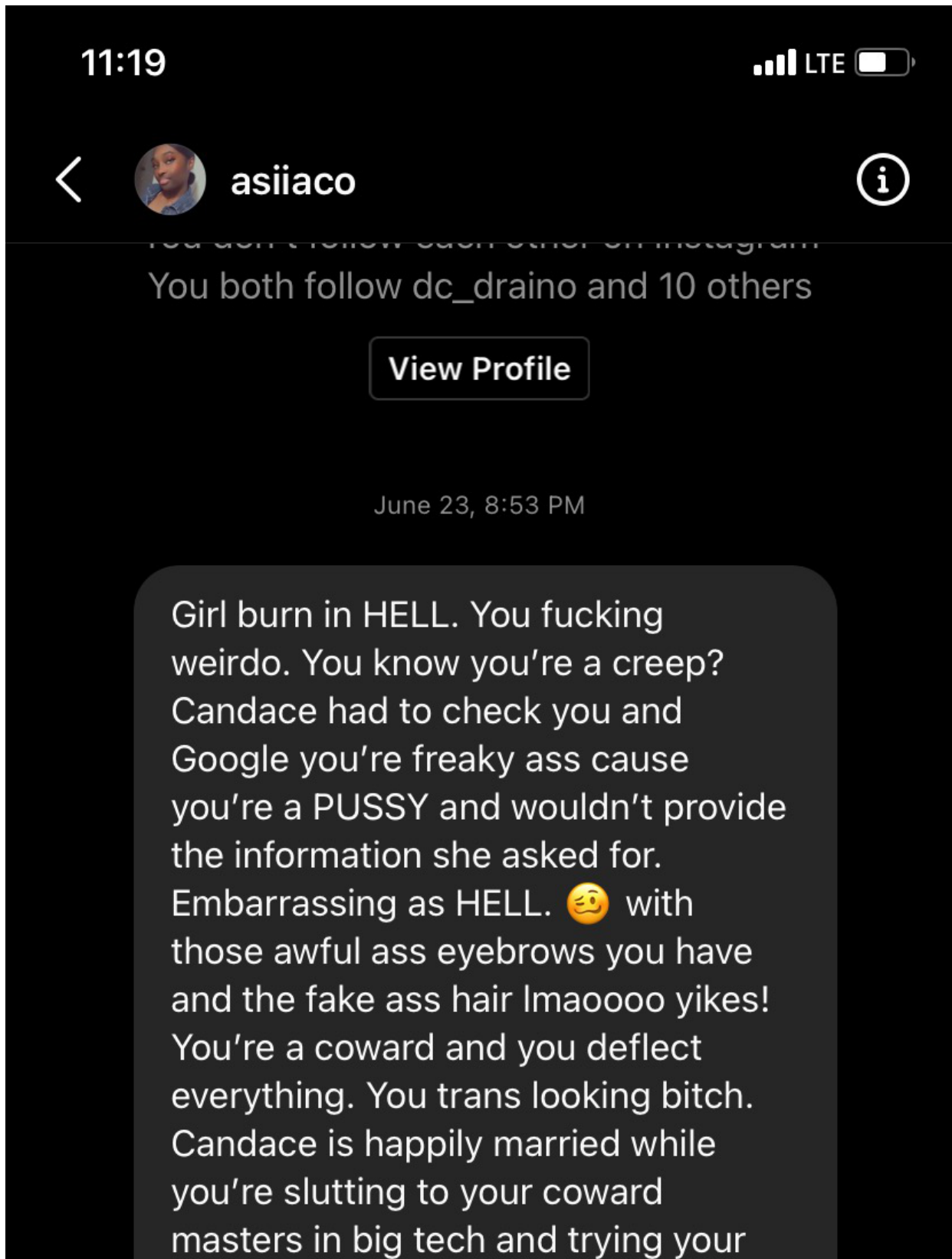
Delivered



iMessage



EXHIBIT #12



best to consume your own delusional lies. Fake ass Conservative you're a Liberal at heart. Candaces' lawyers could buy yours in a heartbeat. Keep it cute Shrek. Fucking disgusting how you treat people who expose your GARBAGE. 😍😍🙌🙌



Accept message request from **asiaco**?

If you accept, members will also be able to call you and see info like your Activity Status and when you've read messages.

Block

Delete

Accept

EXHIBIT #13

From: Facebook <notification@facebookmail.com>
Date: June 22, 2021 at 7:54:03 PM EDT
To: Kimberly Klacik <Kimberly@potential-me.com>
Subject: Arsenal Media Group has stopped working on your business's page
Reply-To: noreply <noreply@facebookmail.com>



Business Manager

Arsenal Media Group has stopped working on the page **Kimberly Klacik**. It will no longer show up in their business and they won't have access to it any more.

[Visit Business Manager](#)

[Manage Notification Preferences](#)

This message was sent to . Facebook, Inc., Attention: Community Support, 1 Facebook Way, Menlo Park, CA 94025

To help keep your account secure, please don't forward this email. [Learn More](#)

EXHIBIT # 14

From: Kim Klacik <kimklacik@gmail.com>
Date: June 22, 2021 at 4:29:38 PM EDT
To: Justin Green <justin@legacyprinthouse.com>
Subject: **Re: Voided: Please DocuSign: Co-Author Agreement - Brave Books, LLC - Kim Klacik.pdf**

Are we not going further?

On Mon, Jun 21, 2021 at 8:34 PM Justin Green via DocuSign
<dse@camail.docusign.net> wrote:

DocuSign



Justin Green voided Please DocuSign: Co-Author Agreement - Brave Books, LLC - Kim Klacik.pdf.

Justin Green
justin@legacyprinthouse.com

Please DocuSign: Co-Author Agreement - Brave Books, LLC - Kim

Klacik.pdf has been voided for the following reason:
Contract void

Envelope ID

07c47917-a77d-4431-ac58-d4b3651320c2

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Kimberly Klacik
KimKForCongress.com
CD7 is getting a makeover!