

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

XIQIU (“BOB”) FU, an individual,

Plaintiff,

v.

GUO WENGUI (a/k/a MILES KWOK, a/k/a WENGUI GUO, a/k/a MILES GUO, a/k/a HO WAN KWOK), an individual; GTV MEDIA GROUP, INC., a Delaware corporation, SARACA MEDIA GROUP, INC., a Delaware corporation, and VOICE OF GUO MEDIA, INC., a Delaware corporation; and LIHONG WEI LAFRENZ (a/k/a SARA WEI) and DONGNA FANG, individuals,

Defendants.

Civil Action No. 7:20-cv-00257

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT

Plaintiff XIQIU “BOB” FU (Pastor Fu) (or Dr. Fu), by and through his undersigned attorneys, complains and alleges the following:

INTRODUCTION

1. The People’s Republic of China (PRC) commits systematic, ongoing, and egregious violations of fundamental human rights, including religious freedom. Although officially purporting to support religious liberty, the ruling Chinese Communist Party (CCP) allows only certain highly limited activity by faith communities. Chinese adults are permitted to attend worship services only at state-approved – so-called “patriotic” – churches, which are closely monitored and controlled.

2. The CCP is violently hostile to various religious communities. Its treatment of the Uighur Muslim population has spawned widespread international outrage and condemnation. Currently, an estimated one million, if not more, Uighur Muslims are being detained in so-called “re-education camps.” These camps employ political brainwashing sessions in an effort to strip devout Muslims of their identities – including their religion and ethnicity – to be replaced with absolute loyalty to the CCP. Former Uighur Muslim detainees have described brutally oppressive conditions, including solitary confinement, forced labor, and starvation diets.

3. Other groups have likewise faced harsh persecution. Despite Buddhism’s status as an officially approved religion, Tibetan Buddhists — an ethnic minority — have endured harrowing religious persecution. The CCP has outlawed traditional Tibetan Buddhist religious items and threatened action against Buddhist temples that fail to comply. CCP officials have explicitly warned that Tibetan Buddhists may be arrested under the regime’s purported “anti-organized crime” program. In addition, thousands of members of Falun Gong, a quasi-religious movement with millions of adherents, have been harassed, arrested and imprisoned. The CCP maintains a security apparatus to stunt the Falun Gong movement. There have been published allegations and reports of Falun Gong practitioners confined to concentration camps, similar to the inhumane treatment of Uighur Muslims.

4. This barbaric treatment of religious and ethnic groups has been severely criticized by the international community, including the United States. On October 6, 2020, nearly 40 countries denounced China’s human rights policies, including its maltreatment of various minority groups. Specifically noting the CCP’s intrusive surveillance techniques and its harsh treatment of various minority groups, including the Uighur Muslims, the 40 nations condemned China’s severe restrictions on religious liberty and called on China to allow independent observers access to

Xinjiang, the historic home of Uighur Muslims. President Trump, Vice President Pence, Secretary of State Mike Pompeo, Ambassador Terry Branstad, and other U.S. embassy and consulate officials have repeatedly and publicly expressed concerns about the CCP's human rights abuses. In the past, the United States, together with other nations, has issued condemnatory statements, similar to the October 6, 2020 pronouncement, calling on China to cease and desist from its crackdown on faith communities.

5. The U.S. Department of State publishes an annual report on international religious freedom, in which China has been repeatedly criticized for its harsh treatment of religious communities. In its 2020 report, the State Department echoes many of the concerns already identified, including detainment of Uighur Muslims; persecution and torture of other faith communities; and China's religious registration policy; all of which has been followed by sharp criticism from U.S. government leaders. The State Department's most recent report lists numerous examples of China's religious persecution carried out through both official laws and governmental practices. The report further notes that every year since 1999, China has been designated as a "Country of Particular Concern" (CPC) – a category under the International Religious Freedom Act of 1998. CPC serves as an identifier of countries that have engaged in or allowed grievous violations of religious liberty. So too, the U.S. Commission on International Religious Freedom (USCIRF) has recommended that the State Department redesignate China as a CPC in 2021.

6. China's unrelenting opposition to Christianity drives many indigenous churches to worship underground in "house churches." If discovered, these churches are often strictly monitored and, in many instances, forced to close. Underground church leaders and members are often subject to surveillance, harassment, and imprisonment. The recent asylum case of *Ting Xue*

v. Sessions, 138 S. Ct. 420 (2017), presented uncontested allegations demonstrating the cruelty of China’s anti-Christianity regime, including its oppression of the “house church” movement.

7. Despite the grave threats that Chinese Christians face, many boldly stand up to the CCP. Plaintiff, Xiqiu (Bob) Fu, a refugee to America from China, is one of those courageous Christians. For years, he has stood as a bold champion of the underground church and, more generally, as an outspoken defender of religious and political liberty for all, regardless of their faith journey.

8. Pastor Fu first displayed his courage and love of freedom as a student leader in the 1989 Tiananmen Square demonstrations. In May 1989, thousands of unarmed Chinese students and workers gathered at Beijing’s Tiananmen Square to protest peacefully in favor of democracy and improved conditions for China’s working class. On June 4, 1989, China’s communist regime declared the protestors to be “counterrevolutionaries” and ordered the Chinese military to remove them from Tiananmen Square by force, and to execute or arrest those who refused. The military violently removed the unarmed protestors, killing thousands in the process by firing on them with assault rifles and running them over with armored vehicles.

9. Because Pastor Fu organized the participation of his classmates at Tiananmen Square, the CCP declared him leader of an illegal organization. He was subject to months-long forced confession, surveillance, and intimidation tactics by CCP officers. Even after bearing witness to the brutality against Tiananmen Square protestors and experiencing the CCP’s revenge against him, Pastor Fu continued to hold true to and espouse his pro-democracy beliefs.

10. In the months following the Tiananmen Square massacre, Pastor Fu converted to Christianity. He taught English during the day while leading a Beijing house church at night. After years of faithfully adhering to his Christian beliefs, Pastor Fu’s peaceful actions—often labelled

by the CCP as “state subversion”—were discovered by authorities. As a result, Pastor Fu and his wife, Heidi Fu, were imprisoned in Beijing for two months.

11. Along with Heidi and their then-infant son Daniel, Pastor Fu applied for refugee status in the United States and was recognized as an overseas religious refugee fleeing the CCP’s oppressive regime. On June 27, 1997, Pastor Fu and his family escaped – through Hong Kong – to the United States, where their refugee status gained them immediate recognition as lawful permanent residents. Pastor Fu, his wife Heidi, and their son Daniel all became naturalized U.S. citizens in 2003. In his adopted country, Pastor Fu formally trained for Christian ministry at Westminster Theological Seminary in Glenside, Pennsylvania. In 2002 he founded ChinaAid, a nonprofit organization dedicated to promoting international religious freedom. Pastor Fu went on to earn his Ph.D. from St. John’s College, Durham University in the United Kingdom and has been awarded an honorary doctorate in global Christian leadership from Midwest University in St. Louis.

12. For the past eighteen years, Dr. Fu has served in Christian ministry and become an internationally recognized spokesperson decrying the CCP’s freedom-denying policies and practices. By shining the light on human rights abuses in China, and providing spiritual and legal training to Chinese church leaders, Dr. Fu and his organization based in Midland, Texas have been highly effective in promoting the values of religious liberty and human rights.

13. Dr. Fu currently serves as Editor-in-Chief of the Chinese Law and Religion Monitor, a journal focusing on religious freedom and the rule of law in China, and is a guest editor for Chinese Law and Government, a journal published by UCLA. Dr. Fu’s work has earned him numerous distinctions, including the 2020 William Wilberforce Award from The Colson Center and the 2007 John Leland Religious Liberty Award from the Southern Baptist Ethics & Religious

Liberty Commission. Dr. Fu currently serves as a senior fellow on international religious freedom at the Family Research Council; as Adjunct Senior Fellow at the Institute on Religion and Democracy in Washington, D.C.; and is a member of the Task Force on National Security and Foreign Policy for Asian Affairs at the Heritage Foundation.

14. In carrying out ChinaAid's mission, Dr. Fu has testified numerous times before various governmental bodies, including the Tom Lantos Human Rights Commission, the House Foreign Affairs Committee, the Senate Judiciary Committee, the U.S. Commission on International Religious Freedom (USCIRF), and the Congressional-Executive Commission on China (CECC), as well as the United Nations Commission on Human Rights and the Parliaments of the United Kingdom, the Netherlands, the European Union, and Taiwan. He also serves as a member of the Council on Foreign Relations.

15. Despite his decades-long dedication to human rights, democracy, and religious liberty, Dr. Fu has recently come under malicious attack by Defendant Guo Wengui (Guo). Utilizing various media platforms, including those owned or operated by Defendant GTV Media Group, Inc., Defendant Saraca Media Group, Inc., and Defendant Voice of Guo Media, Inc., Guo has maliciously issued numerous false, defamatory, and threatening statements against Pastor Fu and his family. In recent weeks, these utterly unfounded and defamatory provocations have steadily grown worse in their vehemency.

16. After repeatedly and maliciously defaming Dr. Fu and ChinaAid on social media, including platforms owned or operated by Defendant GTV Media Group, Inc., Defendant Saraca Media Group, Inc., and Defendant Voice of Guo Media, Inc., Guo is now openly calling for his hundreds of thousands of followers to "kill" Dr. Fu. As of September 24, 2020, Guo is offering tens of thousands of dollars in cash and securities for anyone who succeeds in "getting rid of" Dr.

Fu. As a result of Defendant Guo's utterly false, maliciously defamatory, and physically threatening attacks, Dr. Fu and his family are no longer able to live in their home. Among other individuals, Defendants Sara Wei and Dongna Fang have actively participated in Guo's campaign of defamation and character assassination against Pastor Fu, including inciting protests outside Dr. Fu's family home in Midland, Texas. At the advice of local and federal law enforcement, the Fu family has been evacuated from their home, separated, and are living in four distinct locations. They continue day after day reasonably to fear for their physical safety.

PARTIES

17. Plaintiff XIQIU (BOB) FU is a naturalized American citizen residing in Midland, Texas. In 1997, Pastor Fu and his wife fled to the United States as religious refugees. In 2002, Pastor Fu founded ChinaAid, a nonprofit Christian ministry and persecution watchdog. Consistent with Christian teaching, Pastor Fu's organization is engaged in promoting human rights in China and around the globe. To that end, Dr. Fu frequently speaks out against the CCP's oppressive policies.

18. Defendant GUO WENGUI, a/k/a MILES KWOK, GUO HAOYUN, MILES GUO, and HO WAN KWOK (hereinafter, "Guo"), is an individual residing in New York, New York County, New York. He may be served with summons at 781 Fifth Avenue, 18th Floor, New York, NY 10022. On information and belief, Guo is a Chinese national and billionaire owner of Beijing Zenith Holdings. On information and belief, Guo is an economic fugitive of China who fled to the United States in 2014 after being accused by Chinese authorities of money laundering, fraud, rape, and other serious crimes. On information and belief, FBI counterintelligence agents have been investigating Guo's business dealings in the United States since at least July of 2020.

19. Defendant Guo made international news recently as the owner of the \$35 million yacht “Lady May,” on which the FBI conducted an early morning raid on August 20, 2020 and arrested well-known political strategist Stephen K. Bannon. Earlier in June 2020, together with Steve Bannon, Guo announced the creation of the “New Federal State of China,” a self-proclaimed pro-democracy movement that is purportedly intended to replace CCP rule.

20. Although holding himself out as an anti-CCP activist, Defendant Guo has been accused by dozens of individuals in the Chinese American community as maintaining a close relationship with the Chinese Ministry of State Security (MSS) and, after entering the United States, having pledged allegiance to Xi Jinping’s regime (*See* Addendum A). On August 26, 2017, Guo appeared in a television interview on Mirror TV, a Chinese language news organization based in New York. In the interview, Guo pledged “to serve under President Xi” and “to contribute to President Xi’s China dream.”

21. Although claiming to support the Chinese pro-democracy movement, Guo employs his vast legal, financial, and corporate resources, together with his robust social media presence, to systematically target pro-democracy and pro-religion activists in the Chinese American community. Since 2018, Guo has attacked Chinese human rights activists and *bona fide* CCP dissidents in the United States with aggressive lawsuits – including actions for defamation – and disparaging comments posted online.

22. This year, Plaintiff Bob Fu became Guo’s latest target. Beginning on or before September 24, 2020, Guo has orchestrated a multi-faceted campaign of character assassination, including malicious statements distributed online and in Midland, Texas, aimed at intimidating Dr. Fu and sullyng his reputation. Recently, Guo’s vicious defamation campaign has extended to include organized protests immediately outside Pastor Fu’s home in Midland, Texas. Utilizing his

vast presence on social media and the internet, including platforms owned or operated by Defendant GTV Media Group, Inc., Defendant Saraca Media Group, Inc., and Defendant Voice of Guo Media, Inc., Guo has issued statements calling for and encouraging continuing protests at the Fu family residence. Guo has also publicly called for actual violence – including threats of death – against Pastor Fu. Guo’s reckless behavior and the severity of his threats prompted this lawsuit.

23. Defendant GTV MEDIA GROUP, INC. is a for-profit corporation and a citizen of Delaware with its principal place of business in New York, New York. Defendant GTV MEDIA GROUP, INC. can be served through its registered agent at Corporate Creations Network, Inc., 3411 Silverside Road, Tatnall Building, Suite 104, Wilmington, New Hanover County, DE 19810. Defendant Voice of Guo Media, Inc. used multiple media platforms, including GTV.org and GNews.org, to feature original, defamatory content regarding Pastor Fu.

24. Defendant SARACA MEDIA GROUP, INC. is for-profit corporation and a citizen of Delaware with its principal place of business in New York, New York. Defendant SARACA MEDIA GROUP, INC., can be served through its registered agent at Corporate Creations Network, Inc., 3411 Silverside Road, Tatnall Building, Suite 104, Wilmington, New Hanover County, DE 19810.

25. Defendant VOICE OF GUO MEDIA, INC. is a for-profit corporation and a citizen of Delaware with its principal place of business in Tucson, Arizona and has appeared in this case. Defendant Voice of Guo Media, Inc. used multiple media platforms, including YouTube and Discord, to feature original, defamatory content regarding Pastor Fu.

26. Defendant LIHONG WEI LAFRENZ (a/k/a SARA WEI) is an individual residing in Tucson, Pima County, Arizona and has appeared in this case. Defendant Wei is President and

Director of Voice of Guo Media, Inc. Defendant Wei is an individual agent of Defendant Guo who has actively participated in Guo's campaign to defame, harass, and commit illegal acts against Dr. Fu. Defendant Wei has personally and repeatedly defamed Pastor Fu, recruited followers to protest outside his home by way of multiple media platforms, and regularly communicated with her co-conspirator Defendant Guo to provide updates on the progress she was making in gathering numerous protesters to descend on Pastor Fu's Midland home.

27. Defendant DONGNA FANG is an individual residing in San Francisco, San Francisco County, CA. She may be served with summons at 21 Maynard St., San Francisco, CA 94112-1505. On information and belief, Defendant Fang is an individual agent of Defendant Guo who has actively participated in Guo's campaign to defame, harass, and commit illegal acts against Dr. Fu.

JURISDICTION AND VENUE

28. This Court has jurisdiction pursuant to 28 U.S.C. § 1332. This is a civil action for stalking, defamation, invasion of privacy, assault, private nuisance, and civil conspiracy. The parties are diverse in citizenship.

29. Plaintiff XIQIU (BOB) FU is a United States citizen who resides in Midland, Texas. The Court has plenary jurisdiction over state-law claims and causes of action asserted by Dr. Fu.

30. Plaintiff XIQIU (BOB) FU seeks damages in excess of \$75,000, thus meeting the requirements of 28 U.S.C. § 1332(a).

31. Defendant GUO WENGUI is a Chinese citizen and resident of the State of New York and is therefore diverse in citizenship to Dr. Fu. *See* 28 U.S.C. § 1332(a)(1).

32. Defendant GTV MEDIA GROUP, INC. is a Delaware for-profit corporation with its principal place of business in New York, New York. *See* 28 U.S.C. § 1332(a)(1), (c);

33. Defendant SARACA MEDIA GROUP, INC. is a Delaware for-profit corporation with its principal place of business in New York, New York. *See* 28 U.S.C. § 1332(a)(1), (c);

34. Defendant VOICE OF GUO MEDIA, INC. is a Delaware for-profit corporation with its principal place of business in Tucson, Arizona. *See* 28 U.S.C. § 1332(a)(1), (c);

35. Defendant DONGNA FANG is a resident of San Francisco, California, and is therefore diverse in citizenship to Dr. Fu. *See* 28 U.S.C. § 1332(a)(1).

36. Defendant LIHONG WEI LAFRENZ (a/k/a SARA WEI) is a resident of Tucson, Arizona, and is therefore diverse in citizenship to Dr. Fu. *See* 28 U.S.C. § 1332(a)(1).

37. This Court may exercise personal jurisdiction over each named Defendant under Texas' long-arm statute, which is coextensive with federal constitutional due process limits. *See* Tex. Civ. Prac. & Rem. Code § 17.042(2).

38. Venue is proper in the Western District of Texas, Midland-Odessa Division. Dr. Fu is a citizen of the United States who resides within the District. *See* 28 U.S.C. § 1391(c)(1). Further, a substantial part of the events giving rise to Dr. Fu's claim occurred and were directed by the Defendant to occur in Midland, Texas. *See* 28 U.S.C. § 1391(b)(2).

STATEMENT OF FACTS

39. Guo Wengui enjoys an enormous following across his social media accounts, websites, and broadcast services. To carry out his campaign of defamation and vilification against Pastor Fu and other innocent Chinese Americans, Guo has employed the assets and resources of Defendant GTV Media Group, Inc., Defendant Saraca Media Group, Inc., and Defendant Voice of Guo Media, Inc. On information and belief, Defendant GTV Media Group, Inc. and Defendant Saraca Media Group, Inc. contribute to the daily operations of Defendant Guo's media platforms including GTV.org and GNews.org.

40. In addition to his corporate assets and resources, Guo aggressively utilizes various social media platforms. Guo's Chinese-language Twitter account has over 30,000 followers. Guo's English-language Twitter account has over 20,000 followers. Guo's YouTube account boasts over 400,000 subscribers. Videos posted on Guo's YouTube account often receive viewership in the hundreds of thousands – sometimes millions.

41. Guo's live broadcasting service "GTV" is delivered via streaming websites such as GTV.org, YouTube, Vimeo, Periscope, and often enjoys a viewership in the hundreds of thousands – sometimes millions. Articles posted on Guo's website, GNews.org, are often viewed by tens of thousands of people who access the site directly. Articles on GNews.org have also been reposted on various websites such as The Drudge Report, which enjoys daily viewership in the millions of people. Taken together, Guo's vast presence on social media and across the internet gives him the capacity to reach millions of people in the Chinese American community and around the world.

42. Guo mounted his public attacks against Pastor Fu in late September 2020 through a series of videos posted on GTV.org, GNews.org, Twitter, and YouTube. These videos expressly called for action against Pastor Fu. In the first video posted on September 24, 2020 (**Video 1**), Guo threatened Dr. Fu with protests only. However, in the second video, posted on September 25, 2020 (**Video 2**), Guo issued his first appeal for his followers to "kill" Bob Fu as part of a larger, international "Kill Cheaters Campaign." In **Video 2**, Guo speaks directly into the camera and falsely accuses Dr. Fu of being a CCP agent, as well as a "threat to all human beings." Referencing a group of individual targets associated with his "Kill Cheaters" initiative, Guo states: "We use our money, time, and courage to deal with them. How can we kill CCP if we cannot kill them first?" Guo further offers to fund the activities of his followers for "however long the campaign lasts."

Screenshot from Video 2 – September 25, 2020:

43. On or around September 25, 2020, Guo released a memorandum to his followers providing additional written information about his “Kill Cheaters” initiative. In translation, the memorandum is entitled *Standards of Action and Headquarters Support for Global “Kill Cheaters” Campaign*. The memorandum offers monetary compensation of up to \$10,000 for followers who participate on a “kill cheaters team.” Detailed instructions are provided, including instructions to organize teams of at least fifty people into “strategic levels” consisting of a fifteen-member “advance troop.” The memorandum suggests that should a campaign conform to these written standards, support in the form of pre-paid expenses and supplies would be provided to participants by Guo’s organization – the “Federation of New China.”

44. The following day, on September 26, 2020, five of Guo’s followers appeared outside Dr. Fu’s residence in Midland, Texas. From the sidewalk, Guo’s followers shouted profanities at Dr. Fu’s house and echoed Guo’s false allegations that Pastor Fu is a disguised CCP spy. At the time, Dr. Fu was in Washington, D.C. participating in the 2020 Prayer March on the National Mall. His wife and children were home alone. Dr. Fu’s family became aware of Guo’s threats and feared for their safety. They promptly contacted local law enforcement. At

approximately 10:00 AM, the Midland Police Department responded to the presence of protestors in connection with Guo's threats. Uniformed and civilian-clothed police officers flooded the area around Dr. Fu's residence. The FBI dispatched a surveillance team to monitor Dr. Fu's residence on a 24-hour basis.

45. Guo was undeterred by the presence of local law enforcement and federal agents. To the contrary, on the following day, September 27, 2020, Guo posted another video on social media (**Video 3**), employing a now-familiar format – wearing sunglasses and speaking directly into the camera. In the video, Guo states in full:

Xiqiu Fu, Bob Fu, stop bluffing! What can you do with the two-dozen people you called in last time? You are nothing in front of us. We will send at least 100 to 200 comrades to your house tomorrow. We will see how much power you have in the U.S. You sound like more powerful than President Trump. That's so scary. We must check it out. Once our comrades get to your house tomorrow, we will never retreat. We will not start another campaign until we are done with you.

Screenshot from Video 3 – September 27, 2020:



The same day, Guo posted another video (**Video 4**) on social media naming "Xiqiu Fu (Bob Fu)" in a list of individuals identified as targets in his "Kill Cheaters" campaign.

Screenshot from Video 4 – September 27, 2020:



In yet another video broadcast on September 27, 2020 (**Video 5**), Guo urges his followers to target the individuals named on his list, insisting, “If you didn’t participate in the global kill cheaters campaign, there’s something wrong with you. You need to take actions. None of those cheaters should be missed. We need to see the result.”

Screenshot from Video 5 – September 27, 2020:



46. Guo's commands – and monetary incentives – prompted his followers to act. By way of example, one of Guo's followers, Wengeng Wang (Wang), promptly traveled to the California residence of an individual named on Guo's hit list, Jianmin Wu. On September 27, 2020, Wang staked out in Mr. Wu's driveway and began shouting challenges at Mr. Wu to "hurry up and kill me" so that Wang could become a "hero for our New Federal State of China." Wang also echoed Guo's threats to "kill" Dr. Fu. Wang filmed the incident and the video was later published online by Guo's various media outlets (**Video 6**). In full, the recordings show Wang shouting the following, in translation:

Come honor my wish to be a hero! I want to be a hero for our New Federal State of China! Hurry up and kill me so that my comrades can build me a monument and donate money to take care of my family! [Laughing] Just kidding. Scumbag Jianmin! And that Bob Fu! Bob Fu, didn't you fucking say you have a gun? Wait for me to kill Jianmin Wu first and you'll be the next ... You dirtbags milk the First Amendment in U.S. for your freedom of speech... I am not afraid of death, let alone your thugs... Hongkuan Li, Bob Fu, Shi Wei and Xianmin Xiong, I will go [sic] your houses one after another. Get your guns ready and have your bullets loaded. You'd better shoot me or you just wait and see.

Screenshot from Video 6 – Guo's Follower Mr. Wang Wengeng Stakes Out the California Residence of Guo's Target Mr. Jianmin Wu – September 27, 2020:



47. Authorities were made aware of Guo's continued threats, now including those against local and federal law enforcement authorities. The following day, September 28, 2020, surveillance by local and federal authorities continued at Dr. Fu's residence. To ensure their physical safety, Dr. Fu's wife and children were transferred to a safe house. At 8:00 AM, the Midland Police Bomb Squad was put on emergency standby. At 11:00 AM, a security detail was formed to meet Dr. Fu at Midland International Airport upon his arrival from Washington, D.C. Meanwhile, Guo posted another video (**Video 7**) threatening Dr. Fu, marking the third consecutive day of threats. In **Video 7**, Guo offers payment to his followers in the form of securities if they "converge to Midland Texas to find Bob Fu and kill him." Translated, Guo states in full:

I'm appealing again to all the comrades and Sara, Biao Lin, Texas cowboy... Connect and converge to Midland Texas to find Bob Fu and kill him. This is the time to test your loyalty and ability. I will reward you with stocks according to your action. All the cheaters' evil deeds must be fully checked and documented. Cheater Doudou is even using a fake name. Whether you are a true comrade or not, we will figure it out from your action.

48. On September 28, 2020, Dr. Fu traveled to the United States Department of State in Washington, D.C. He briefed U.S. Government officials regarding Guo's threats including Dr. Miles Yu, an advisor to U.S. Secretary of State Mike Pompeo for East Asian affairs.

49. That same day, Defendant Wei emerged as a leader and co-conspirator in Defendant Guo's campaign against Dr. Fu. Wei was an administrator on a WhatsApp group message titled "Global farms. Kill cheaters campaign major contributors' group"¹ who used the name "Sara." Defendant Guo used this "Global farms" WhatsApp group to ask Defendant Wei to take a leadership role in organizing the Midland protests. In addition to directly recruiting followers to protest outside Dr. Fu's home through multiple media platforms, Defendant Wei regularly

¹ This message was originally posted in Chinese and has been translated into English.

communicated with Defendant Guo through the WhatsApp group to provide updates on the progress she was making in gathering protesters to respond to the call to descend *en masse* on Midland. Defendants Guo and Wei also conspired in private messages to produce defamatory caricatures of Pastor Fu. Guo specifically instructed Ms. Wei “you need to find the picture of Bob Fu’s employee badge when he worked for the CCP party school.” Subsequently, Defendant GTV Media Group, Inc. utilized the websites GTV.org and GNews.org to distribute defamatory caricatures of Pastor Fu featuring the same content referenced in Wei and Guo’s conversations. The dozens of caricatures containing false and defamatory statements about Pastor Fu are exhibited at length below.

50. On September 29, 2020, an article was posted on GNews.org, re-publishing a live broadcast by Guo originally transmitted on September 27 (**Video 8**). In the broadcast, Guo proceeds to repeat the list of individuals identified as targets in his “Kill Cheaters” campaign, including Dr. Fu. “They deserve to die,” Guo proclaims, “the revolution exposed all these bastards. They are bluffing.” The video features Guo’s own English subtitles, which capture Guo’s threats against Dr. Fu, as well as false accusations that Dr. Fu is a CCP agent who has orchestrated fraudulent asylum claims and laundered millions of dollars through dumpling houses owned by Chinese dissident and U.S. citizen Sasha Gong. Guo’s states in full:

My fellow fighters, let’s get rid of all of the fake democracy activists first. No rush, let’s get rid of them first. ... We must let America and the West see the true color of these people. Bob Fu, stop bluffing. All your pathetic bluffing tricks. What are you going to do with those 20 people of yours? Stop lying around. A pastor from the CCP’s Party School. All your pathetic connections in Texas mean nothing to us at all. You’ve been repeatedly deceiving the American people. But our Whistleblowers’ Movement will unveil your true color. How did you come to America as a CCP member? How many false political asylum cases have you arranged? Where have that several million dollars gone every year? Where did that several million come from? Let alone several millions of dollars, even several

hundreds of thousands or several tens of thousands, would be enough for him to spend the rest of his life in prison. Do you believe it when Bob Fu said his money was all clean? Bob Fu, you just wait and see. In the coming 2, 3 weeks, let's see what tricks you have. All these evil tricks of yours. You've fooled so many people acting as the representative of the Chinese Christianity and Catholic. Who gave you the authority to do so, Bob Fu? Who asked you to be their representative? How did you come to America? Where did your money go? Sasha Gong, an American citizen, owns several dumpling houses. Where did all the money go?

Screenshot from Video 8 – Published on GNews.org on September 29, 2020; originally transmitted on September 27, 2020:



51. On October 4, 2020, Guo's followers went door-to-door in Midland neighborhoods and churches and distributed flyers smearing and defaming Pastor Fu and falsely painting him as a CCP spy. Among other things, the flyers maliciously stated: "Bob Fu: Fake Priest and a CCP Spy." In one instance, a group of four Chinese men arrived in a pick-up truck at Northwestern Baptist Church at 3901 Mockingbird Ln., Midland, Texas. One of the men exited the truck, dropped off one or more defamatory flyers at the church's main office, then promptly returned to the truck and drove away. That same day, one of the congregation members at Northwestern Baptist informed Dr. Fu about the defamatory flyers.

52. On October 5, 2020, a group of approximately 50 protestors arrived on a charter bus near Pastor Fu's residence. At or around 7:30 AM, approximately 20 protestors gathered on the sidewalk immediately in front of Dr. Fu's home. The protestors repeated Guo's false allegations that Dr. Fu is a CCP spy. Protestors held duplicate signs that read "Bob Fu is a CCP Spy;" "Bob Fu: His Money From CCP & Work for CCP;" and "Bob Fu: Fake Priest and CCP Spy." The protestors occasionally chanted in Mandarin and recorded videos on their phones. One protestor was arrested by Midland Police for trespassing on Pastor Fu's property. When asked who organized the protest and provided the bus, protestors falsely claimed that they arrived separately and that they were not part of an organization.

Dr. Fu's Residence – Morning of October 5, 2020:



That morning, Dr. Fu was delivering an address to a virtual conference of the United Nations Human Rights Council (UNHRC), in which he discussed the CCP's violations of the International Covenants on Human Rights with respect to children's rights to religious freedom. At the time, his wife and children were home alone. By late morning, the number of protestors on the sidewalk had swelled to approximately 50 individuals. At or around noon, law enforcement officers

informed Dr. Fu of a credible threat on his and his family's safety. At the direction of law enforcement, Dr. Fu's family were evacuated to a safe house. His youngest daughter, Melissa, was removed from school.

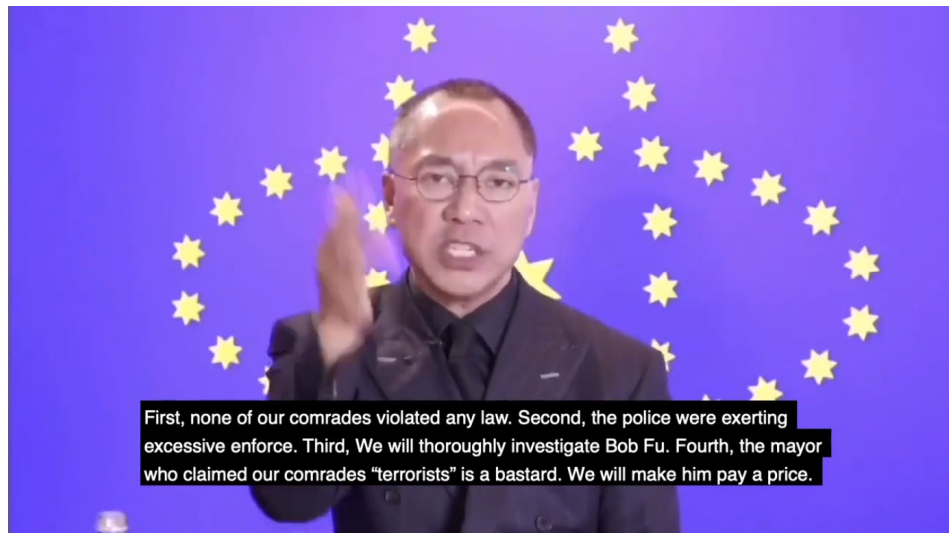
53. At 3:00 PM on October 5, 2020, Midland Mayor Patrick Payton, conducted a press conference to address the unrest caused by protesters outside the Fu family residence. Mayor Payton dismissed as unfounded the protestors' claims that Dr. Fu is a CCP spy or agent. To demonstrate the point, Mayor Payton called on the CCP to release Chinese prisoners of conscience – in China – on behalf of Dr. Fu. Of course, those requests were not fulfilled because Dr. Fu has no affiliation with or influence over the CCP. To the contrary, Dr. Fu fled communist oppression after being arrested by CCP officials for "illegal evangelism." In his role at ChinaAid and as a contributor to numerous pro-democracy and pro-human rights publications, Dr. Fu is well-known as a champion of the underground church and as an outspoken opponent of the CCP's oppressive policies and practices. Mayor Payton communicated his – and the Midland community's – support for Pastor Fu and his organization.

54. Guo promptly responded to Mayor Payton's remarks. On October 7, 2020, Guo held a livestream broadcast on his GTV platform (**Video 9**), in which he continued to press his followers to protest outside Dr. Fu's residence. Guo affirms to his followers, "we will thoroughly investigate Bob Fu." In direct response to Mayor Payton's remarks, Guo fulminated: "The mayor who claimed our comrades are 'terrorists' is a bastard. We will make him pay a price." Guo further referred to Mayor Payton as a "terrorist" and "corrupted." **Video 9** also levies a new allegation against Dr. Fu, falsely claiming that he is responsible for rallying a small militia to intimidate and harass Guo's followers who had descended on Midland. Guo presents no evidence to substantiate these false allegations. Guo states in full:

Bob Fu, we want you to stand out. We want you to show us the dark force behind you. One lawyer and team in Texas just called me one hour ago. They said they found eight rifles nearby our comrades on the scene of our protest. Those rifles were all brought there by rednecks from Bob Fu's church. Eight rifles – I am legally responsible for what I said. Bob Fu, as a pastor, you get ten rednecks to live in our comrades' hotel, threaten them and follow them. What's worse, they brought eight rifles with them. Bob Fu, your time as a pastor is over. We are not afraid of CCP, how could we be afraid of the mayor of the tiny city Midland? Are you kidding me?

Contrary to Guo's assertions, Dr. Fu has never encouraged anyone to threaten, intimidate, or commit acts of violence. To the contrary, Dr. Fu lives and acts according to his long-held Christian faith, which teaches principles of non-violence and love – even for one's enemies.

Screenshot from Video 9 – Livestream Broadcast October 7, 2020:



55. On October 8, 2020, Guo's media outlets began to document the ongoing protests outside Dr. Fu's residence on a daily basis, including live broadcasting from Midland. One livestream service shows that at one juncture on October 8, 2020, some 245,926 people were viewing a live video feed of protests outside of Dr. Fu's home. In the video, Guo's followers are seen chanting in Mandarin and waving signs proclaiming, "Bob Fu is a CCP Spy" and other defamatory statements.



56. Livestreams of the Midland protests were also aired every day on GTV.org and received millions of views. In one case, a video posted on GTV.org containing defamatory caricatures of Pastor Fu received 3.4 million views. As of the present filing, that video, entitled “Global Punishment - Midland, Texas - Xiqiu Bob Fu” remains accessible on GTV.org.



57. In addition to broadcasting live the protests at Pastor Fu's residence, Guo's media outlets including GTV.org also broadcasted images of Pastor Fu smearing his reputation. In one instance, the screen of a live broadcast was split between three images: i) a live feed of the Midland protests, ii) an animated news anchor providing commentary about Pastor Fu, and iii) an image of Pastor Fu presented as a communist devil, complete with menacing horns and long black claws. The caption read, "Everyone deserves truth: Tell the Truth! Bob Fu." These images were made available to Guo's hundreds of thousands of followers on GTV and across his various social media accounts.



58. On October 9, 2020, protests continued on the street outside Dr. Fu's residence; Guo's media outlets including GTV.org continued to broadcast live video of the scene; Guo's media outlets also began conducting and broadcasting live interviews of protestors.



59. On October 9, 2020, an article was published on GNews.org entitled *Miles Guo: Bob Fu, the Fake Pastor Thought He Was Being Clever, But Played Right into Our Hands*. The article provides translation of comments made by Guo the previous day. Guo is quoted as reiterating his false and defamatory accusation that “Bob Fu is a famous fake pastor who is in reality an overseas agent for the CCP in the U.S.” Guo further falsely accuses Dr. Fu of having bribed the Mayor of Midland and violated other laws. According to Guo, the fact Dr. Fu had gained the support of Mayor Payton, as well as the broader Midland community, suggests “the real probability of bribery and unlawful behaviour.” Guo also threatens legal action stating, “We shall see this fake ‘pastor’ in court. Since we are not even afraid of the CCP, can this fake pastor Bob Fu stop us?” Guo also levied new allegations attempting to substantiate his false claims that Dr. Fu is a CCP spy. Guo represented that a “reliable source” had confirmed that Dr. Fu was once a CCP military officer. Guo’s caricature smears Dr. Fu as a danger to American national security, an evil person, and deserving of criminal prosecution:

A reliable source of ours confirmed that Bob Fu once belonged to the 12th branch of the Ministry of Security of CCP in China. Ma Jian, the Deputy Minister, and Director Tao of the Hainan 12th Branch of the Ministry of Security were all Bob Fu’s superiors back then in China. If the United States had one thousand hidden CCP assets such as Bob Fu, it would have a big problem. In the battle

between good and evil, we will bring this fake pastor, Bob Fu to justice in the U.S.

Contrary to Guo's assertions, Dr. Fu has never been affiliated with the Chinese Ministry of State Security. Nor did Dr. Fu bribe Mayor Payton – or anyone else in the Midland community – in order to secure their support.

60. On October 9, 2020, Guo's social media accounts shared a live broadcast of an interview with one of the protestors on the street outside Dr. Fu's home (**Video 10**). The interviewee proceeded to issue suicidal threats against Dr. Fu. Speaking in Mandarin, her words are translated as follows:

I come here today fully prepared that I will not return home. Why? Because I know how evil and brutal Bob Fu can be. I told my child to take good care of his father and our home. I'll fight him to the end. I'll block the bullet with my body when necessary. Bob Fu, you evil old man, come out! I only want an answer from you! You come out, I will fight you to the end.

Screenshot from Video 10 – October 9, 2020:



61. On October 10, 2020, several local and state-wide organizations together with individuals in the Midland community announced their plan to hold a “Stand for Religious Freedom Rally,” where families and community leaders could show support for Pastor Fu. The

rally was scheduled for October 15 by local Christian groups, including the U.S. Pastor Council, the Midland Ministerial Alliance, Watch&Pray International Ministries, and Nehemiah220 Ministries. Advertisements for the rally indicated that it welcomed participation from “pastors, elected officials, community and business leaders, families, and all freedom loving citizens.” Defendant Guo promptly issued a response, doubling down on his attacks against Pastor Fu. On October 10, yet another article was posted on GNews.org, entitled *Religion Rally – Another Maneuver of a Disguised CCP Spy, “Pastor” Bob Fu?* The article once again sought to tarnish Pastor Fu’s reputation by purportedly tying him to the Chinese Communist Party and claiming once again that he had served as an agent for the Chinese Ministry of State Security (MSS):

According to Mr. Guo, this Rally is allegedly a move using one of the ‘11 crisis dealing tactics’ that Fu had learned from the Social Research Division of Ministry of State Security of the People’s Republic of China, aka the 12th division of the MSS. Mr. Guo said Bob Fu must be brought to justice, so the American people will find out who he is, where he came from, why and how he came to the U.S., why he has so much money, from whom the money is given to him, how many asylum frauds he has committed and how many people he has deceived and bullied. Bob Fu might be able to trick or buy a couple of Americans, but surely he can not deceive all.

Contrary to the article’s assertions, Dr. Fu has never worked for the Chinese Ministry of State Security, let alone the specific “Social Research Division” of the MSS referenced in the article. Further, the plan to hold the October 15 rally was not conceived by Dr. Fu, but to the contrary was organized by various local associations in the Midland community. These organizations, listed *supra*, simply planned to exercise their First Amendment right to assemble and express their support for Dr. Fu’s life’s work of advancing religious freedom in China and around the world.

62. On October 11, 2020, Guo’s follower Mr. Wang Wengeng arrived in Midland, Texas to participate in the protests.

63. On October 12, 2020, Guo posted a video on his English-language Twitter account (@VOG_2020) renewing his verbal attacks on Dr. Fu (**Video 11**). First, the caption of the video repeated Guo's false accusations that Dr. Fu is a CCP spy. The caption also levied a new false allegation against Dr. Fu – suggesting that he is currently under investigation by the United States government:

#Miles: BobFu (ChinaAid CEO) is a fake pastor, who immigrated to HongKong as a (CCP) agent. From Oct 16, US government will investigate and find out BobFu's true identity! #TakeDownTheCCP and expose CCP's minions in the USA.

The caption is followed by a video of Guo in his usual format – wearing sunglasses and speaking directly into the camera. Guo's own English subtitles provide translation of his comments made in Mandarin:

You said your resume was included in your book. Is that true? Where did your money come from? How did you get to Hong Kong? Who gave you the Hong Kong ID, Bob Fu? Baba (means shit) Fu? I tell you BaBa (shit) Fu again, the National Intelligence Agency helped you get the HK ID. Everyone, even pigs know that when immigrating to Hong Kong, as long as your have no relatives there, are all intelligence immigrants. No one excluded, no one! ... Bob Fu, tell me, how did you get to Hong Kong? Your HK ID was 100% certified by the national security agency, right? It was easy to get, right?

This message was made available to 21,000 people via Guo's English-language Twitter account alone.

64. On October 13, 2020, Guo disseminated another caricature of Dr. Fu presented as a CCP devil.

Screenshot from Live Broadcast Posted on GTV.org and Guo's Twitter – October 13, 2020:



65. On October 14, 2020, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated yet another caricature of Dr. Fu portrayed as a CCP devil.

Screenshot from Live Broadcast Posted on GTV.org and Guo's Twitter – October 14, 2020:



66. On October 15, 2020, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated a caricature of Dr. Fu presented as a CCP spy, including text reading "Bob Fu CCP Spy." Protests continued on the sidewalk and streets outside Dr. Fu's home.

Guo's broadcasts continued to document the protests with these defamatory caricatures overlaid or displayed side-by-side with the live feed of the protests.

Screenshot from Live Broadcast Posted on GTV.org and Guo's Twitter – October 15, 2020:



Dr. Fu's Residence – October 15, 2020:



67. On October 15, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled "Demonstration against FAKE PASTOR Bob Fu." The video features animated and live news anchors providing commentary with respect to the Midland protests. The video also features caricatures of Dr. Fu portrayed as a communist devil and communist spy,

including the knowingly false and defamatory caption, “Bob Fu CCP SPY.” These images display the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

68. Protests continued outside Dr. Fu’s residence from October 16 through October 18, 2020.

69. On October 16, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Multistreaming with Restream.io.” The video features animated and live news anchors providing commentary with respect to the Midland protests. The video also features caricatures of Dr. Fu portrayed as a communist devil, including the knowingly false and defamatory captions, “Bob Fu CCP SPY” and “Disguised as priest.” These images display the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

70. On October 18, 2020, Defendant Wei posted a video in which she urged Guo’s followers to descend on Midland and join the unfolding protest. In the video, Wei speaks directly into the camera. She is flanked by a blue flag bearing the insignia of the “New Federal State of China,” the supposed pro-democracy organization founded by Defendant Guo and Steve Bannon on June 4, 2020. In the video, Defendant Wei states in part:²

This “Bob fu campaign” really excites us. We are just average Chinese people. All we want to do is go there and tell the truth. We learned who Bob Fu is through Mr. Guo Wengui’s “Whistleblowers’ Movement,” as well as our own cognition. We call on supporters to go to Midland, Texas voluntarily, and share the truth about him among residents of his community.

The video was later reposted to GNews and GTV.

² While Defendant Wei spoke in Chinese, this video included English captions.

Screenshot of Defendant Wei's October 2020 video:

71. On October 19, 2020, the protests outside Dr. Fu's home grew larger and more disruptive. Guo continued to broadcast the protests. Live commentators documented the scene. On October 19, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated another caricature of Dr. Fu presented as a CCP spy. In the image, Dr. Fu is portrayed wielding an AK-47 machine gun alongside a communist hammer and sickle. The image is accompanied by the caption "Bob Fu: CCP SPY Disguised as a priest." Pastor Fu does not own or otherwise possess an AK-47.

Screenshot from Live Broadcast Posted on GTV.org and Guo's Twitter – October 15, 2020:

72. On October 20, 2020, the number of protesters outside Dr. Fu's home increased to 62 individuals. On that day or even earlier, Guo began issuing directives to his hundreds of followers through the popular group messaging app "Discord." Guo is the administrator of a Discord server entitled "Voice of Guo," where users interact by sharing text messages and images. Any text message or image that is shared on a Discord server is made available to users who have elected voluntarily to join that server. The "Voice of Guo" Discord server is invite-only, meaning one can only join the server if he or she receives a unique invitation code from someone who is already a member. Guo's various caricatures of Dr. Fu were often shared and re-posted on the Voice of Guo server and seen by hundreds of users. Hyperlinks to watch the live broadcast of protests outside Dr. Fu's residence on GTV.org were also frequently shared. Users often sent text messages echoing Guo's false accusations against Dr. Fu. Many users also indicated that they were on the ground in Midland participating in the protests.

Screenshot from Live Broadcast Posted on GTV.org and Guo's Twitter/Discord – October 20, 2020:



73. On October 20, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled "Demonstration against the CCP SPY Bob Fu. Everyone deserves

truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed as a communist clown, including the knowingly false and defamatory caption, “CCP SPY.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

74. On October 21, 2020, one of Guo’s followers participating in the Voice of Guo Discord server sent a message that translates to “GO, BOMB CCP BANDIT/THIEF.” The message was accompanied by an image of what appears to be a photograph of handheld explosives in the palm of the user’s hand. The message was also distributed among Guo’s followers alongside a caricature of Dr. Fu presented as a CCP clown, displayed above. The Midland Police Bomb Squad was put on emergency standby in response to a “terroristic threat.”

75. On October 21, 2020, the number of protestors outside Dr. Fu’s home increased to an estimated 80 individuals. In concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated another caricature of Dr. Fu portrayed as a CCP spy, accompanied by a caption reading “Religious Quack.” The same day, an article was posted on GNews.org entitled *An Open Letter to Mayor Patrick Payton, Senator Ted Cruz, and Senator Marco Rubio*. The article repeated the accusation that Dr. Fu is a “CCP spy” and a “secret agent” who has “commit[ed] espionage.” The article also repeated the false accusation that Dr. Fu had bribed Mayor Payton in order to gain his support, and falsely suggested that Dr. Fu had done the same with respect to Senators Cruz and Rubio, who had issued public statements condemning the protests. In truth and in fact, Dr. Fu did not bribe anyone.

Screenshot from Live Broadcast Posted on GTV.org and Guo's Twitter/Discord – October 21, 2020:



76. On October 21, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed with bright red eyes alongside the communist hammer and sickle, including the knowingly false and defamatory captions, “CCP SPY” and “Religious Quack.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

77. On October 22, 2020, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated a caricature of Dr. Fu presented alongside a CCP insignia and piles of cash. Protests continued on the sidewalk and nearby streets. Guo’s broadcasts continued to document the protests with these defamatory caricatures overlaid or displayed side-by-side with the live feed of the protests.

Screenshot from Live Broadcast Posted on GTV.org and Guo's Twitter/Discord – October 22, 2020:



78. On October 22, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed with a bright red face emblazoned with the communist hammer and sickle next to a money bag. This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

79. On October 23, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed as a communist vampire, including the knowingly false and defamatory captions, “CCP SPY,” “CCP’s Party School’s lecturer” and “Religious Quack.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

80. Protests continued outside Dr. Fu’s residence on October 23, 2020.

81. On October 24, 2020, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated a caricature of Dr. Fu presented as a CCP officer, including a red CCP armband and uniform labelled “CCP Group.” Protests continued on the sidewalk and streets immediately outside Dr. Fu’s home. Guo’s broadcasts continued to document the protests with these defamatory caricatures overlayed or displayed side-by-side with the live video feed of the protests.

Screenshot from Live Broadcast Posted on GTV.org and Guo’s Twitter/Discord – October 24, 2020:



82. On October 24, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves

truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed in a communist Chinese military uniform, including the knowingly false and defamatory caption associating Dr. Fu with the “CCP Group.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

83. On October 25, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed as a communist devil, including the knowingly false and defamatory caption, “Fake pastor.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

84. On October 26, 2020, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated a caricature of Dr. Fu presented as a CCP hydra, captioned “Bob Fu: CCP Spy.” The Midland protests and daily broadcasts continued.

Screenshot from Live Broadcast Posted on GTV.org and Guo’s Twitter/Discord – October 26, 2020:



85. On October 26, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed as a hydra with a communist tattoo, including the knowingly false and defamatory caption, “CCP SPY.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

86. On October 27, 2020, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated a caricature of Dr. Fu presented as a CCP clown, including now-familiar attacks, “CCP Spy Bob Fu,” “Fake Pastor,” and “Religious Quack.” These daily images were viewed live by Guo’s tens of thousands of followers. For instance, this particular image was seen by over 70,000 people on that day alone. Guo’s broadcasts of the Midland protests continued with multiple news anchors stationed on the sidewalks outside Dr. Fu’s residence. By now, the number of protestors had swelled to over 100 individuals.

Screenshot from Live Broadcast Posted on Guo’s Social Media – October 27, 2020:



Screenshot from Live Broadcast Posted on Guo's Social Media – October 27, 2020:



Screenshot from Live Broadcast Posted on Guo's Social Media – October 27, 2020:



87. At 8:11 PM on October 27, 2020, one of Guo's followers on the Voice of Guo Discord server using the pseudonym "XO Xiao" posted a message declaring, "Bob Fu participating effort for defaming and deporting Mr Guo. Kill Bob Fu." A follow-up message posted by another user using the pseudonym "07" read, "Bob Fu, you are done." Pastor Fu has taken no efforts either to defame or to encourage the deportation of Defendant Guo.

88. At 9:48 PM on October 27, 2020, one of Guo’s followers on the Voice of Guo Discord server using the pseudonym “Xi Guo” posted a message declaring, “Bob Fu has been collaborating with the Biden family trying to deport Mr. Guo. This explains Biden is a foreign agent and Bob Fu is a Big Fish. Warrior Comrades in Texas have been working so hard.” Pastor Fu has never communicated with anyone in the Biden family, nor has he ever attempted to do so.

89. On October 27, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed as a clown holding a communist balloon, including the knowingly false and defamatory captions, “CCP SPY,” “Religious Quack” and “Fake pastor.” These images display the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

90. On October 27, 2020, Defendant Wei posted the following message on Defendant Voice of Guo’s Discord server:³

We Chinese should completely get rid of a kind of deeply imbedded concept which is “it’s better to save trouble [or can be translated to “let sleeping dogs lie”]. Here are reasons why we stand at Midland, TX:

1, It’s imperative that [we] must thoroughly investigate Bob Xiqui Fu, don’t let CCP spy harm America;

2, We absolutely should not confuse right and wrong. Must have mayor [Payton] have dialogue. (We won’t look for him at City Hall, we are not petitioners. That is how CCP country operates);

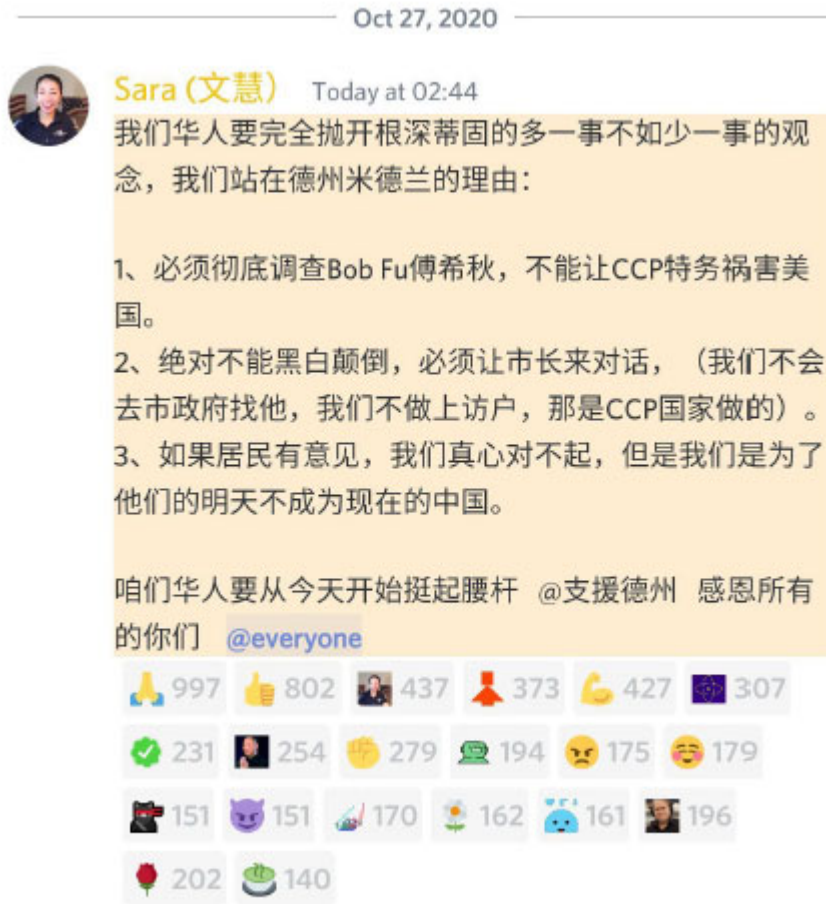
3, If residents have objections, we are sorry from our heart. But what we do is to help prevent their tomorrow from becoming today’s China;

We Chinese should walk straight from today. @SupportTXOperation Thank all of y’all. @everyone

³ Defendant Wei’s message was originally posted in Chinese and has been translated into English.

Defendant Wei's message was seen by at least 5,000 of Guo's followers.

Screenshot of Defendant Wei's October 27, 2020 Discord Message:



91. On October 28, 2020, in concert with GTV Media Group, Inc. and Voice of Guo Media Group, Inc., Guo disseminated a new caricature of Dr. Fu portrayed as a communist devil, including captions, “Pro-democracy imposter,” “CCP SPY,” “CCP’s Party School’s lecturer,” “Phony democracy fighter,” “Religious Quack,” and “Fake pastor.” This particular image was seen by over 296,000 people on GTV.org alone.

Screenshot from Live Broadcast Posted on Guo's Social Media – October 28, 2020:



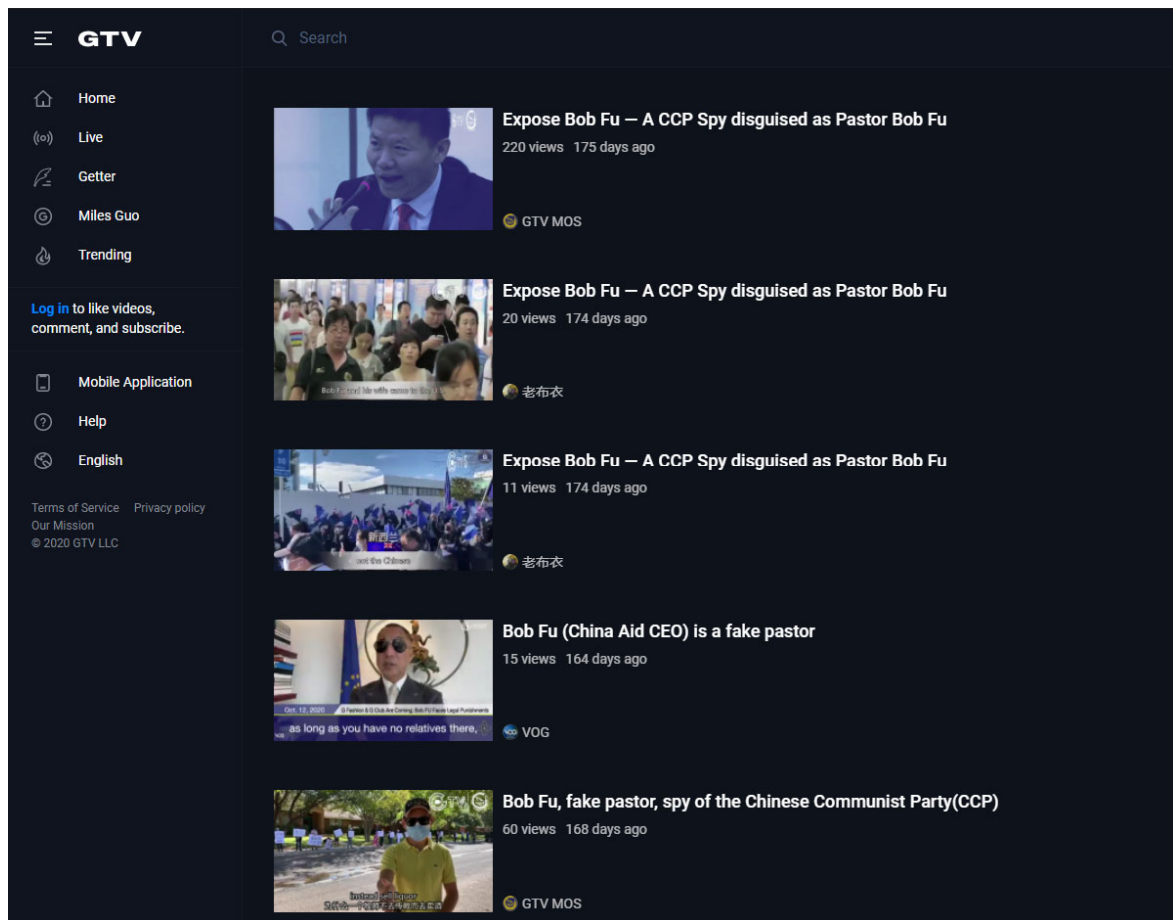
92. On October 28, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video features a news anchor providing live commentary at the Midland protests. The video also features a caricature of Dr. Fu portrayed as a communist devil, including the knowingly false and defamatory captions, “Pro-democracy imposter,” “CCP SPY,” “CCP’s Party School’s lecturer,” “Phony democracy fighter,” “Religious Quack,” and “Fake pastor.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

93. On October 29, 2020, Defendant Voice of Guo Media, Inc. posted a video on its YouTube channel entitled “Demonstration against the CCP SPY Bob Fu. Everyone deserves truth!” The video displays Defendant Guo’s followers outside of Dr. Fu’s home. Various protesters are interviewed about the situation. Some of those same protesters are later arrested. The video also features a caricature of Dr. Fu portrayed as a prisoner with a bloodied face, including the knowingly false and defamatory captions, “Pro-democracy imposter,” “Phony

democracy fighter,” “Religious Quack,” and “Fake pastor.” This image displays the logos of Defendant Voice of Guo Media, Inc. and websites owned or operated by Defendant GTV Media Group, Inc.

94. While Guo’s platforms continued to repost the false and defamatory caricatures amid the ongoing protests, Defendant Guo also conspired with GTV Media Group Inc. to post additional defamatory content online on GTV.org and GNews.org. From September 2020 through March 2021, numerous videos were posted on GTV.org containing false and defamatory content about Pastor Fu.

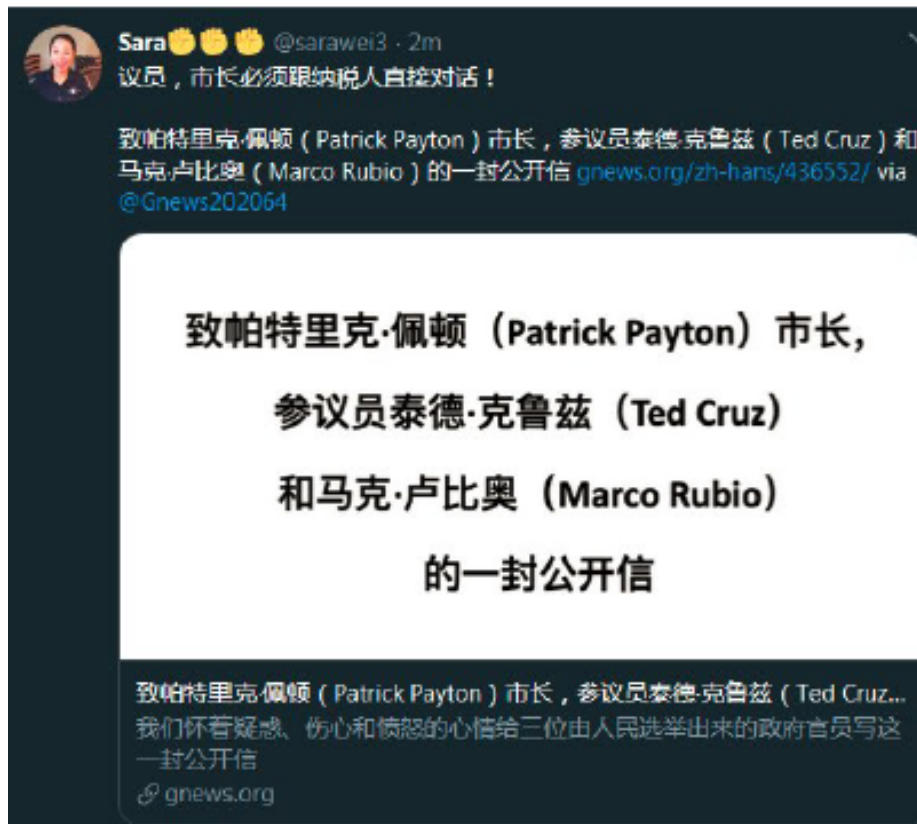
Screenshot of a Sample of Content posted on GTV.org as of March 30, 2021:



95. On October 30, 2020, Defendant Wei tweeted the following: “We wrote this open letter with confusion, sadness and outrage to the three government officials elected by the people.

Patrick Payton, Marco Rubio, and Ted Cruz.” The tweet included a link to an article posted on GNews.org entitled “An Open Letter to Mayor Patrick Payton, Senator Ted Cruz, and Senator Marco Rubio.” The article repeated the accusation that Dr. Fu is a “CCP spy” and a “secret agent” who has “commit[ed] espionage.” The article also included the false accusation that Dr. Fu had bribed Mayor Payton to gain his support and falsely suggested that Dr. Fu had done the same with respect to Senators Cruz and Rubio, who issued public statements condemning the protests.

Screenshot of Defendant Wei’s October 30, 2020 Tweet:



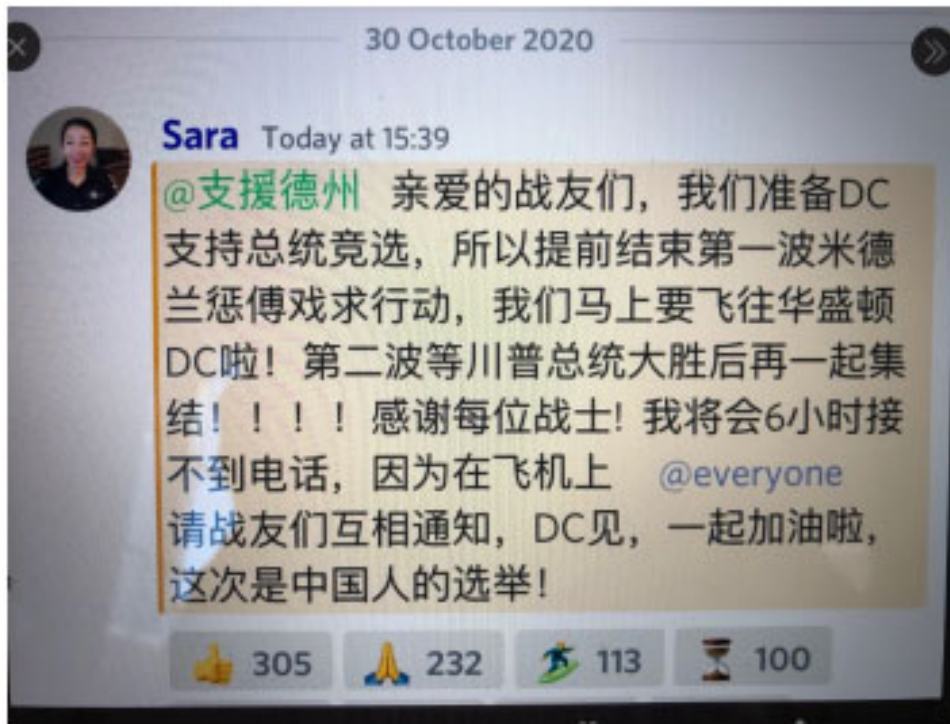
96. On October 30, 2020, Defendant Wei posted the following message on Defendant Voice of Guo’s Discord server:⁴

Dear warriors friends, we are preparing to support the President election in DC. So we terminate in advance the first wave of operation of “Punishing Bob Xiqui Fu in Midland campaign.” We are flying to Washington DC right away! We will

⁴ Defendant Wei’s message was originally posted in Chinese and has been translated into English.

regroup for the second wave of operation after President Trump won the election!!! Thanks to every warrior. I won't pick up any phone calls for six hours because I am in the airplane. @eveyeone. Please each warrior let others know this. See you in DC. Cheer up together. This election is Chinese people's election.

Screenshot of Defendant Wei's October 30, 2020 Discord Message:



97. Despite overwhelming condemnation of the protests by the Midland community, U.S. officials, and various human rights NGOs, Guo continues to incite protests and encourage his hundreds of thousands of followers to thereafter disparage and attack Dr. Fu.

98. On November 6, 2020, Dr. Fu and ChinaAid sent a letter to Defendants Guo, Wei, Fang, Voice of Guo Media, Inc., GTV Media Group, Inc., and Saraca Media Group, Inc. demanding that the defamatory statements regarding Bob Fu and ChinaAid be retracted.

99. As of the filing of Plaintiff's Original Complaint, the Fu family was in exile. At the advice of law enforcement officials, the Fu's were unable to return to their Midland home. Pastor Fu was under law enforcement protection at an undisclosed location, and his family was scattered across four separate locations. Pastor Fu's school-age children did not see their father

for weeks. Pastor Fu’s mother-in-law, who resides in Midland, was hospitalized on October 30, 2020 due to stress brought on by her well-founded fear resulting from Guo’s and his followers’ continual barrage of threats.

100. On December 17, 2020, Defendant Guo livestreamed a video of himself in which he offered his thoughts on the present lawsuit. He praised his “comrade” Sara (Defendant Wei) and stated “[o]ur comrades made great efforts in Texas. They spent 68 days there. They are brilliant warriors and contributors of our New Federal State of China.”

101. On March 10, 2021, Defendant Wei participated in a livestream question and answer session on Defendant Voice of Guo, Inc.’s Discord server, which has since been re-named the “Voice of Good” Discord server. Defendant Wei acknowledged her participation in the campaign against Bob Fu and her role in organizing the protests at his home. She made the following apology:⁵

If there is a chance, I would like to tell Bob Fu that although he has sued me, I have calmly accepted the fact that he hates me. In the court, I will tell the truth about why I participated in the matter. Of course, I didn’t go to his house in person. But we have posted all the details about how I organized people to protest outside his house, as well as Guo Wengui’s audio messages, for the judge to review. Once you tell a lie, you lose all your credit. Then the U.S. Government will no longer trust you, and they will investigate everything. They will not believe what you say.

CLAIMS FOR RELIEF

COUNT I: STALKING – CHAPTER 85, TEXAS CIVIL PRACTICE & REMEDIES CODE.

102. Plaintiff re-alleges and incorporates all other paragraphs in this Complaint as if fully restated herein.

103. Pastor Fu and his family are victims of organized, targeted, and repeated harassing behavior directed specifically at Pastor Fu and his family. Defendant Fang and others, operating

⁵ Defendant Wei’s message was originally posted in Chinese and has been translated into English.

under the direction and control of Defendant Guo, along with local agents of Guo, on more than one occasion in the past five weeks have engaged in threats of serious bodily harm, death, acts of violence, and other harassing behavior actionable under Chapter 85 of the Texas Civil Practice & Remedies Code.

104. As a result of Defendants' wrongful and threatening behavior, Dr. Fu and his family members continue to fear for their respective safety and the safety of each other. Defendants' misconduct and egregious behavior may well lead to violence and bodily injury to Dr. Fu and/or his family, given the events that have arisen from similar "protests" incited by Defendant Guo.

105. Because each Defendant had the apparent ability to carry out each of the threats, Dr. Fu reasonably fears for his own safety and that of his wife and children.

106. Pastor Fu has satisfied all conditions precedent and statutory prerequisites to bring this cause of action. Although Pastor Fu has, through counsel, clearly demanded that each Defendant (and other antagonizers led by Guo) cease and desist from their harassing behavior, each Defendant has continued to engage in such behavior. Pastor Fu has reported the incidents of Defendants' behavior to both the Midland Police Department and the District Attorney as a stalking offense.

107. As a result of Defendants' continued misconduct, threats, assaults, and intentional acts including their harassing behavior, Pastor Fu seeks damages, actual and exemplary, arising from Defendants stalking him and his family.

COUNT II: DEFAMATION PER SE.

108. Plaintiff re-alleges and incorporates all other paragraphs in this Complaint as if fully restated herein.

109. Defendants Guo, Wei, and Voice of Guo Media, Inc. caused substantial damage to Dr. Fu by irreparably harming his reputation through statements that were negligently published, knowingly false, or made with reckless disregard for their truth or falsity. Defendants' false and defamatory statements also caused Dr. Fu mental anguish by the relentless assault, week after week, on Dr. Fu's professional reputation and integrity. Defendants' vicious and knowingly false statements brought Pastor Fu, his entire adult life in ministry, and his commitment to freedom into disrepute.

110. Working in concert, Defendants Guo, Wei, Voice of Guo Media, Inc., and GTV Media Group Inc. repeatedly and systematically smeared the reputation of Dr. Fu with defamatory statements, assigning him knowingly false labels including "fake priest," "fake pastor," "religious quack," "evil," "pro-democracy imposter," "phony democracy fighter" "fake democracy activist," "disguised CCP spy," "CCP minion," "human trafficker," "money launderer," "cheater," "deceiver," "bluffer," "piece of trash," "bully," "a threat to all human beings," and other defamatory statements that were negligently published, knowingly false or made with reckless disregard of the truth.

111. Defendants Guo, Wei, and Voice of Guo Media, Inc., and GTV Media Group, Inc. directed and oversaw the broadcasting of numerous caricatures portraying Dr. Fu as a CCP spy. These false and misleading images were intended to vilify Dr. Fu and encourage protestors outside Dr. Fu's home in Midland, Texas to threaten and intimidate him and his family.

112. Defendant Guo repeatedly and systematically belittled Dr. Fu in the public eye, stating "you are nothing in front of us," and ridiculed Dr. Fu's "pathetic connections in Texas." Guo repeatedly ridiculed Dr. Fu in connection with his profession as a pastor, referring to Pastor Fu as "bastard," "pathetic," "despicable," and "Bob 's***' Fu." More menacingly, Defendant Guo

claimed that Dr. Fu “deserve[s] to die,” and falsely asserted that sufficient evidence exists for Dr. Fu “to spend the rest of his life in prison.”

113. Defendants’ false and defamatory statements were broadcast to a wide audience of individuals in the Chinese American community and around the globe. Utilizing his vast audience on the internet, including platforms owned or operated by Defendant GTV Media Group, Inc., Defendant Saraca Media Group, Inc., and Defendant Voice of Guo Media, Inc., Guo repeatedly encouraged his hundreds of thousands of followers to disparage and malign Dr. Fu’s reputation.

114. In turn, Guo’s followers have referred to Dr. Fu as a “fake priest,” “CCP spy,” “scumbag,” “dirtbag,” and “evil,” among other labels. Defendants are responsible for this sudden explosion of disparaging attacks against Dr. Fu, who until Defendants orchestrated defamatory and threatening assault has received nothing but praise and support from the Midland, Chinese American, and Christian communities. Even in the face of Defendants’ malicious and continuing campaign of false disparagement, Dr. Fu continues to receive moral support from these communities, as well as numerous human rights NGOs, United States Senators, Members of the U.S. House of Representatives, and other U.S. government officials (*See* Addendum B).

115. To advance his defamatory campaign of vilification against Dr. Fu, Defendant Guo directed the provision of financial incentives to encourage his followers to repeat and proliferate his floodtide of false and defamatory smears. To propagate his own attacks on Dr. Fu, Guo directed and oversaw a weeks-long campaign of public protests outside Dr. Fu’s Midland residence. Among other acts, Defendant Guo directed and oversaw the production of flyers, signs, and articles that were distributed electronically over the internet and physically in Midland, Texas. These flyers, signs, and articles, containing knowingly false and defamatory statements, were intended

to discredit Dr. Fu's ministry; destroy his reputation in the Midland community and beyond; and encourage additional protestors to harass, threaten, and intimidate Dr. Fu and his family.

116. Where Defendants did not intentionally mislead the public with slander, libel, and defamatory images, Defendants acted negligently and with reckless disregard for the truth or falsity of their claims about Dr. Fu. By way of example, some of the articles published by Guo (as well as many signs produced for public display for his followers) allege that Dr. Fu is a "CCP Spy" on grounds that Dr. Fu was once employed at a Chinese Communist Party School. While Dr. Fu once taught English in China at a state school, Guo intentionally omits Dr. Fu's long personal history as an outspoken advocate for democracy, freedom of religion, and human rights in China. Here are the true facts: While Dr. Fu taught English in China, he also risked his life and freedom by covertly preaching to the underground Christian Church. It was Dr. Fu's courage practicing his Christian faith and speaking up for the oppressed Chinese people that led – in 1996 – to his arrest and imprisonment by CCP authorities. Then, in the decades since he was granted refugee status in the United States, Dr. Fu has bravely continued to speak out on behalf of the underground church in China through his ministry. Guo's caricatures of Dr. Fu blindly ignore this rich, well-documented history, as well as Dr. Fu's ongoing work to protect, preserve, and defend religious and civil rights in China.

117. Tellingly, much of the evidence upon which Guo bases his false narrative is taken directly from Pastor Fu's autobiography, *God's Double Agent: The True Story of a Chinese Christian's Fight for Freedom*, published by Baker Publishing Group in 2013. In his autobiography, Pastor Fu addresses many (if not all) of the questions that Guo has raised with respect to Dr. Fu's background. Guo's propaganda exploits Pastor Fu's autobiography by selectively omitting key facts in order to paint a profoundly false narrative. As an example, many

of Guo's hit pieces point to an image of Pastor Fu's teacher identification card from the Beijing Administrative College, where Pastor Fu taught from 1993-1996. According to Guo, this is evidence that Pastor Fu is a "CCP spy." Ironically, this image was originally published in Pastor Fu's own autobiography. Dr. Fu's book explains at length how from 1993-1996, he taught English as a day job while evangelizing and ministering at night to college students and the underground Christian church in Beijing. This earned him the nickname that would become the title of his autobiography, "God's double agent." The image taken from Pastor Fu's book, provided below, illustrates Guo's knowingly deceptive omissions:



This was my teacher's ID for my day job at the Communist Party school. In the evenings I organized illegal house churches, earning me the humorous nickname "God's Double Agent." 1993

Heidi and I stand in the center of the campus of the Beijing Party School, where I taught from 1993 to 1996.



An Easter celebration of an underground house church in the hills near Beijing.

After we returned from the Easter celebration, we were followed by PSB officers who were gathering information for our eventual arrest.



As detailed *supra*, Pastor Fu and Heidi Fu were arrested by CCP authorities in 1996 for “illegal evangelism.” They fled China due to the danger of re-arrest by China’s anti-Christian, anti-human rights regime. The Fu’s were also expecting their second child at the time of their arrest. Remaining in China meant the CCP’s coercive family planning policies would have resulted in the forced abortion of their baby. Dr. Fu’s book further recounts how, after deciding to flee to the United States, he was forced to jump from a second story window in order to evade CCP officers. These undisputed facts are all presented in Dr. Fu’s book along with the image of his teacher identification card. Defendants intentionally omit these facts because they do not fit Guo’s false and distorted description of Dr. Fu’s life and career.

118. Defendant Guo and his entities also intentionally omit Pastor Fu’s continued public activism against the CCP’s oppressive policies, including his continual pledges of support for persecuted communities of faith in China. As recently as September 26, 2020, Dr. Fu appeared on the National Mall to pray for Christians in China who are suffering under CCP oppression. His September 26 address was delivered before thousands of individuals participating in the 2020 Prayer March in Washington, D.C., and celebration of the inaugural National Day of Prayer and Return. Other speakers on the National Mall included Franklin Graham, former Arkansas Governor Mike Huckabee, and Vice President Mike Pence. In his address, Dr. Fu stated: “I especially pray for Xi Jinping’s repentance and the collapse of the CCP. May God grant stamina and courage to those who are imprisoned for the sake of righteousness in China... I pray for your imprisoned servants, many hundreds of thousands of them, may You continue to comfort them and strengthen their family members by making them stand firm on the gospel of Jesus Christ.” At the very moment Pastor Fu was offering this invocation for oppressed religious minorities in

China, Defendant Guo and his cabal were organizing protests to intimidate Pastor Fu's wife and children and paint him as a "CCP spy" and "fake pastor."

119. If anyone desires to learn about Dr. Fu's history; his escape from the oppressive Chinese Communist regime; or his life as a pastor and father in Midland, Texas; that information is widely available and easily accessible. Dr. Fu's autobiography has been widely distributed. His credibility has been endorsed by public figures including former First Lady Laura Bush and Vice President Pence. Pastor Fu is a well-known figure in the Midland, Chinese American, and Christian communities across the nation. Nevertheless, Guo's attacks distort Pastor Fu's character and present him as someone he is not. Guo's glaring omissions and outrageous distortion of the truth about Dr. Fu's life demonstrate the willful and malicious intent behind his vicious campaign to ruin Dr. Fu's good name.

COUNT III: INVASION OF PRIVACY – INTRUSION UPON SECLUSION.

120. Plaintiff re-alleges and incorporates all other paragraphs in this Complaint as if fully restated herein.

121. Invasion of privacy is a "willful tort which constitutes a legal injury." *Billings v. Atkinson*, 489 S.W.2d 858, 861 (Tex. 1973). Texas courts recognize three distinct causes of action for invasion of privacy: (1) intrusion upon one's seclusion or solitude or into one's private affairs, (2) public disclosure of embarrassing private facts, and (3) wrongful appropriation of one's name or likeness. *Texas Comptroller of Public Accounts v. Attorney General of Texas*, 244 S.W.3d 629 (Tex. 2008), citing *Cain v. Hearst Corp.*, 878 S.W.2d 577, 578 (Tex. 1994); *Industrial Found of the South v. Texas Indus. Accident Bd.*, 540 S.W.2d 668, 682 (Tex. 1976).

122. Defendants knowingly and intentionally invaded the privacy of Pastor Fu and his family, day after day and week after week, by intruding upon his solitude and private affairs. Guo's

inciting of disruptive protests at the Fu residence and his issuance of credible, violent threats caused a complete and total disruption in the Fu family's otherwise peaceful course of life. This intrusion was intentional in nature, as reflected by the events set forth, *inter alia*, in paragraphs 42-49, 52, 54, 57, 59, 63-73, 77, and 78, *supra*.

123. The continual protests, which ultimately swelled in number to approximately 100 individuals, were carried out outside Dr. Fu's home, the most private of spaces recognized under the Constitution and laws of the United States. The numerous signs and shouts were deeply disturbing to the entire Fu family, especially the children. The resulting injuries flowing from this continued set of demonstrations in a quiet, residential Midland neighborhood included the entire Fu family being evacuated and displaced for their personal security.

124. The targeted protests – day after day and week after week – prompted both local and federal law enforcement officers to expend enormous efforts and resources to protect the family home and surrounding neighborhood. This onslaught of individuals from around the country, spurred into action by Defendant Guo's stream of provocative and defamatory statements, would be grossly offensive to any reasonable person.

COUNT IV: ASSAULT.

125. Plaintiff re-alleges and incorporates all other paragraphs in this Complaint as if fully restated herein.

126. Defendant Guo knowingly and intentionally threatened Dr. Fu through repeated, calculated attacks in articles, live broadcasts, and social media posts. These threats were not isolated or incidental statements. Rather, each was purposefully disseminated across a range of social media platforms owned or operated by Guo and the corporate Defendants. These articles, broadcasts, and posts reached an audience of millions across the world. They also promoted and

incited additional threats of violence against Dr. Fu, including imminent threats by protestors outside his home.

127. Defendant Guo's threats were neither vague nor distant. The threats – sent first over the course of several weeks, then rapidly over the course of several days – are specific and direct. Taken together and read objectively, Guo's statements are interpreted – at best – as communicating a ready willingness to snuff out the life of Pastor Fu. At worst, they may be construed as direct orders for his followers to assassinate Pastor Fu and endanger his family.

128. *First*, each of Defendant Guo's statements was made with respect to a "Kill Cheaters Campaign" ("灭贼行动"), consisting of a list of individual targets including Pastor Fu. On numerous occasions, Pastor Fu was named among this group of individuals whom Guo refers to as "evil cheaters" who should be "灭" ("mie"), which may be construed as "killed," "eliminated," "eradicated," "exterminated," or "made to perish."

129. *Second*, on September 25, 2020, when referring to a list of individuals including Pastor Fu, Guo stated, "How can we kill CCP if we cannot kill them first?"

130. *Third*, on September 27, 2020, after he threatened to send "one hundred to two hundred comrades" to Pastor Fu's house, Guo stated, "once our comrades get to your house tomorrow, we will never retreat. We will not start another campaign until we are done with you."

131. *Fourth*, on September 27, 2020, Guo referred to a list of individuals including Pastor Fu and proclaimed, "they deserve to die."

132. *Fifth*, on September 27, 2020, Guo referenced the list of individuals in his "Kill Cheaters" campaign, in which Pastor Fu is included, and stated, "If you didn't participate in the global kill cheaters campaign, there's something wrong with you. You need to take actions. None of those cheaters should be missed. We need to see the result."

133. *Sixth*, on September 27, 2020 Guo further encouraged his followers to “get rid of” Pastor Fu.

134. *Seventh*, on September 28, 2020, Guo appealed to his followers to “converge to Midland Texas to find Bob Fu and kill him.” Guo offered payment to his followers in the form of securities if they succeeded in this grisly mission.

135. Guo’s menacing statements also prompted his followers in turn to levy substantial threats against the life of Pastor Fu.

136. *First*, Guo’s follower Mr. Wang Wengeng stated on September 27, 2020, “Bob Fu, didn’t you f***** say you have a gun? Wait for me to kill Jianmin Wu first and you’ll be the next [sic]” Mr. Wang also issued a violent threat against a group of four individuals including Pastor Fu, stating “I will go [sic] your houses one after another. Get your guns ready and have your bullets loaded. You’d better shoot me or you just wait and see.” Subsequently, Mr. Wang arrived in Midland on October 11, 2020 to participate in the ongoing protests outside Pastor Fu’s home.

137. *Second*, an unnamed follower of Guo, interviewed outside Pastor Fu’s home on October 10, 2020, made additional threats on Pastor Fu’s life, stating “I told my child to take good care of his father and our home. I’ll fight him to the end. I’ll block the bullet with my body when necessary. Bob Fu, you evil old man, come out!”

138. The combination of specific threats of imminent harm and the arrival of dozens of Defendant Guo’s followers at Dr. Fu’s home created a reasonable and extreme fear of harm in Dr. Fu and his family. As a result, local and federal law enforcement cooperatively ensured that Dr. Fu and his family were placed in secure locations to protect them from credible threats posed by Defendant Guo and his followers.

139. Guo's violent threats caused actual and substantial damage to Dr. Fu. As a result of Defendant Guo's extreme threats of bodily harm, Dr. Fu was placed under continuous law enforcement protection at an undisclosed, secure location. Resultingly, Dr. Fu was unable to fully perform his duties as president of his nonprofit organization, ChinaAid, which maintains its headquarters in Midland, Texas.

140. Dr. Fu also suffered severe emotional distress as a result of Guo's death threats. Guo's followers first appeared at Dr. Fu's home on September 26, 2020, when Dr. Fu's wife and children were alone at the home. Because he was in Washington D.C. at the time, Dr. Fu was powerless to protect the safety of his family and his property.

141. The gravity – and credibility – of Defendant Guo's threats is further evidenced by the rapid and overwhelming response of law enforcement in working to ensure the safety of Dr. Fu's family and his home. As detailed above, local and federal authorities cooperatively deployed significant assets to ensure the safety of Dr. Fu and his property, including dozens of police officers, FBI agents, and the Midland Police Department Bomb Squad.

COUNT V: PRIVATE NUISANCE.

142. Plaintiff re-alleges and incorporates all other paragraphs in this Complaint as if fully restated herein.

143. The Supreme Court of Texas has clarified the definition of "nuisance" in the civil context: "Taking this opportunity to clarify the law, we hold that the term 'nuisance' refers not to a defendant's conduct or to a legal claim or cause of action but to a type of legal injury involving interference with the use and enjoyment of real property. We further clarify that a defendant can be liable for causing a nuisance if the defendant intentionally causes it, negligently causes it, or—in limited circumstances—causes it by engaging in abnormally dangerous or ultra-hazardous

activities.” *Crosstex North Texas Pipeline, L.P. n/k/a Enlink North Texas Pipeline LP v. Gardiner*, 505 S.W.3d 580 (Tex. 2016).

144. Over the course of several weeks, Defendant Guo intentionally and maliciously orchestrated protests on the sidewalks and street immediately outside Dr. Fu’s residence. Dozens of individuals gathered pursuant to Guo’s instructions and offers of monetary compensation. As a result, Dr. Fu and his family were unable to go about their lives at their family home, which was under the protection of local and federal agents. Dr. Fu’s family members were moved to secure locations and, at the direction of law enforcement, were advised not to return home.

145. Defendant Guo’s statements and actions caused a substantial interference in Dr. Fu’s and his family’s regular use and enjoyment of their property. The nature of the protests organized by Guo in terms of their content, physical proximity, and timetable constitute a nuisance to Dr. Fu’s property – and his livelihood – that Dr. Fu believes would shock the conscience of any person of ordinary sensibilities.

COUNT VI: CIVIL CONSPIRACY.

146. Plaintiff re-alleges and incorporates all other paragraphs in this Complaint as if fully restated herein.

147. The Texas Supreme Court has instructed: “An action for civil conspiracy has five elements: (1) a combination of two or more persons; (2) the persons seek to accomplish an object or course of action; (3) the persons reach a meeting of the minds on the object or course of action; (4) one or more unlawful, overt acts are taken in pursuance of the object or course of action; and (5) damages occur as a proximate result.” *First United Pentecostal Church of Beaumont v. Parker*, 514 S.W.3d 214 (Tex. 2017).

148. Defendant Guo designed and orchestrated a conspiracy to commit illegal acts of assault against Dr. Fu. These acts were executed by Guo and his co-conspirator, Defendant Wei with the knowing purpose of harming Dr. Fu.

149. Across several forms of media including video recordings, live broadcasts, and written documents, Defendant Guo offered or promised securities, pre-payment of travel expenses, physical materials including signs, flyers and articles, and various other financial incentives of monetary value for the purpose of inciting protests and violence against Dr. Fu.

150. Defendant Guo followed through with these promises by busing in dozens of protestors to Midland and offering compensation for their participation in protests outside Dr. Fu's residence. These incentives encouraged dozens of individuals to travel to Midland, to stake out Dr. Fu's house, to harass his wife and children, to distribute slanderous articles, posters, and other materials throughout the Midland community, and to engage in other overt acts intended to harm Dr. Fu. In carrying out this campaign, Guo utilized the assets and resources of Defendants GTV Media Group, Inc. and Saraca Media Group, Inc.

151. Defendant Guo played a central and supervisory role in orchestrating this months-long campaign of character assassination against Dr. Fu. Guo's actions caused actual harm to Dr. Fu by impugning his reputation and inflicting him with emotional distress.

152. Defendant Wei took on a leadership role in Guo's conspiracy against Dr. Fu by organizing, encouraging, and providing updates on the Midland protests.

153. The combination of specific threats of imminent harm and the arrival of dozens of Defendant Guo's followers at Dr. Fu's home created a reasonable and extreme fear of harm in Dr. Fu and his family. As a result, local and federal law enforcement cooperatively ensured that Dr.

Fu and his family were placed in secure locations to protect them from credible threats posed by Defendant Guo and his followers.

RELIEF SOUGHT

154. Defendant Guo Wengui caused substantial and irreversible harm to Pastor Fu, his wife Heidi, and their young children, detailed above. To remedy the grievous wrongs caused by Guo's unlawful campaign of defamation and character assassination, his inciting of protests, his disruption of the regular enjoyment of a family home, his threats of violence, and his other dangerous provocations against the life of Pastor Fu, Pastor Fu is entitled to compensatory damages.

155. Pastor Fu is also entitled to punitive damages because he sustained injuries as a result of misconduct by Defendant Guo that was knowing, intentional, malicious, reckless, or some combination thereof.

156. To serve the ends of justice, Pastor Fu also seeks a comprehensive and efficacious set of equitable remedies, including but not limited to preliminary and permanent injunctive relief.

157. Dr. Fu ultimately seeks injunctive relief that permanently protects him, his family, guests of his home, and his property from irreparable harm caused and threatened by the Defendants. Because Pastor Fu has no adequate remedy at law, he seeks equitable relief that this Court may grant to halt the illegal and wrongful acts repeatedly directed at Dr. Fu and at his Midland residence.

158. Defendants' organized and repeated weeks of "protests" targeting Dr. Fu at his home and broadcasts made across numerous media platforms constitute intentional acts of harassment, stalking, and unlawful invasion of Pastor Fu's and his family's right to privacy, rendering the harm to them irreparable. Losses of privacy, security, and tranquility cannot be

rectified by monetary recovery. However, this Court can restore to Pastor Fu the peaceful sanctuary to which he and his family enjoyed and were entitled before Defendants arrived and caused them reasonably to fear for their physical safety and flee their home.

159. On balance, Dr. Fu seeks the protection that restores his and his family's safety and prevents future invasions of his home privacy so that Defendants' alleged protests no longer overrun Dr. Fu's rights. Dr. Fu seeks appropriate restrictions (time, place, and manner) that will preserve all parties' constitutional rights, in his forthcoming application for a permanent injunction, and that will eventually lead to permanent protections.

160. As evidenced by the voluminous acts of Defendants' misconduct chronicled above, Pastor Fu has a substantial likelihood of success on the merits of his causes of action against each Defendant, such that the injunctive relief requested is warranted.

161. Pastor Fu is also entitled to a permanent injunction sufficient to protect Dr. Fu and provide he and his family the safety and solace to which they are entitled from the outrages misconduct and dangerous acts instigated and executed by Defendants, including credible threats of violence and bodily harm.

WHEREFORE Pastor Fu respectfully demands:

a) That the Court find that Defendants engaged in repeated and continual unlawful conduct, including that which violates the Tex. Civ. Prac. & Rem. Code § 83.001 et seq., and provide immediate injunctive relief by granting Plaintiffs' forthcoming application for a permanent injunction to prevent Defendant Guo, his media companies and platforms including Defendant GTV Media Group, Inc., Defendant Saraca Media Group, Inc., and Defendant Voice of Guo Media, Inc., and his individual agents including Defendant Fang and Defendant Wei, from causing

further injury or mental anguish to Pastor Fu, his family, and his property, or issuing any additional threats or provocative statements as to the same;

b) That judgment be entered against Defendants Guo *et al.* for substantial compensatory damages in an amount shown by the evidence to be reasonable and just to compensate Pastor Fu for the harms they have caused Pastor Fu;

c) That judgment be entered against Defendants Guo *et al.* for punitive damages in an amount shown by the evidence to be reasonable and just to punish the Defendants for the harms they have caused Pastor Fu, and to deter the Defendants from further participating in these unlawful actions against Pastor Fu;

d) That the court grant Pastor Fu reasonable attorney's fees and costs he has incurred and will incur in prosecution of his claims against Defendants Guo *et al.*;

e) That the Court grant not only the relief requested above, but all such other and further relief to which Pastor Fu is entitled, whether by law or equity.

Respectfully submitted this 1st day of April, 2021.

By:

[Signature Blocks on Next Page]

/s/ Lawrence P. Wilson

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on all counsel of record via the Court's electronic filing system on April 1, 2021.

/s/ Lawrence P. Wilson
Lawrence P. Wilson