

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF ALEXANDRIA

JOHN DOE,)
)
 Plaintiff,)
)
 v.)
)
 MATTHEW A. SCHLAPP)
 [REDACTED])
)
 -and-)
)
 MERCEDES V. SCHLAPP,)
 [REDACTED])
)
 Defendants.)

Civil Action No. CL 23001055

Jury Trial Demanded

FILED
 CLERK OF COURTS
 CITY OF ALEXANDRIA
 2023 JAN 17 AM 10:08
 J. GREG PARKS / CLERK
 BY [Signature] / DEPUTY CLERK

COMPLAINT

COMES NOW the plaintiff, John Doe (“Mr. Doe”),¹ by counsel, and for his complaint states the following:

Nature of the Case

1. This action arises from a sexual battery committed by defendant Matthew A. Schlapp (“Mr. Schlapp”) upon John Doe on October 19, 2022, and subsequent dishonest efforts by Mr. Schlapp, his wife, defendant Mercedes V. Schlapp (“Ms. Schlapp”), and others associated and acting in concert with them, to discredit Mr. Doe.

¹ Mr. Doe is bringing this action under a pseudonym, in accordance with Va. Code § 8.01-15.1. The basis for doing so is set forth in paragraph 9, *infra*.

Parties

2. Mr. Doe is a natural person who resides and is domiciled in the State of North Carolina. At the time Mr. Schlapp committed the sexual battery of him, Mr. Doe was working in the State of Georgia as a staff member on the campaign of Herschel Walker for the United States Senate.

3. Mr. Schlapp is a natural person who resides and is domiciled in the Commonwealth of Virginia, in the City of Alexandria. Mr. Schlapp is and has been for more than 8 years the Chairman of the American Conservative Union, which describes itself as the “oldest and largest grassroots conservative organization in the nation.” Mr. Schlapp is also the Chairman of the Conservative Political Action Coalition, a large, well-known advocacy organization active in Republican and conservative political circles which hosts the annual Conservative Political Action Conference (“CPAC”), which it describes as “the largest and most influential gathering of conservatives in the world.” Mr. Schlapp is married to Ms. Schlapp.

4. Ms. Schlapp is a natural person who resides and is domiciled in the Commonwealth of Virginia, in the City of Alexandria. Ms. Schlapp is a television host, and held a senior-level position in the White House in the administration of President George W. Bush, was Senior Advisor for Strategic Communications for the Trump/Pence campaign, and was the White House Director of Strategic Communications during the Trump administration.

Jurisdiction and Venue

5. This Court has jurisdiction over this case pursuant to Virginia Code § 17.1-513.

6. Mr. Schlapp is subject to personal jurisdiction in this Court because he is a resident and domiciliary of the Commonwealth of Virginia and will receive service of process in the Commonwealth of Virginia, and pursuant to Va. Code § 8.01-328.1(A)(3 & 4) and Va. Code § 8.01-328.1(B).

7. Ms. Schlapp is subject to personal jurisdiction in this Court because she is a resident and domiciliary of the Commonwealth of Virginia and will receive service of process in the Commonwealth of Virginia, and pursuant to Va. Code § 8.01-328.1(A)(3 & 4), and Va. Code § 8.01-328.1(B).

8. Venue is appropriate in this Court pursuant to Va. Code § 8.01-262.

Basis for Anonymous Filing

9. There exist special circumstances such that the need for anonymity outweighs the public's interest in knowing Mr. Doe's identity and such need outweighs any prejudice to any other party. Mr. Doe's anonymity is not intended merely to avoid the annoyance and criticism that may attend litigation. Instead, it is intended to preserve the privacy of the victim of a sexual battery. In addition, because Mr. Schlapp and Ms. Schlapp are well known, and in some quarters revered, amongst a portion of the population that has demonstrated a proclivity for threatening violence against those with whom they disagree, the identification of Mr. Doe poses an unusual risk of retaliatory physical or mental harm to Mr. Doe. Mr. Schlapp and

Ms. Schlapp will not suffer any unfairness as a result of Mr. Doe's anonymity, because they have actual knowledge of Mr. Doe's identity.

10. Mr. Doe's identity is known to many persons in the media and the political world, and was further revealed in Twitter posts by Caroline Wren ("Ms. Wren"). However, because Mr. Doe was the victim of a sexual battery, his name has not been widely published in the media.

Facts

The Senate Campaign

11. In 2022, elections were conducted for the United States House of Representatives, and certain seats in the United States Senate. One of the Senate seats up for election was for the State of Georgia. Herschel Walker was the Republican Party's candidate for the Georgia Senate seat.

12. Mr. Doe is and has since 2012 been involved in conservative and Republican Party politics. He has served political campaigns and political committees as a field coordinator, field director, grassroots director, and political director, among other positions, in several states. In 2022, Mr. Doe joined the Herschel Walker campaign (the "Walker Campaign") as a mid-level staffer. When working on campaigns, Mr. Doe attends and provides assistance at campaign events.

13. At many campaign events, prominent speakers are invited to attend to motivate voters and to speak favorably of the candidate. Mr. Schlapp, because of his

prominence in conservative and Republican Party politics, attended and spoke at a number of Republican campaign events leading up to the 2022 elections.²

14. On October 19, 2022, the Walker Campaign held an event in Perry, Georgia. Perry is approximately 2 driving hours from Atlanta. Mr. Doe attended and assisted at the event.

15. Mr. Schlapp was invited to and did attend the event in Perry, where he spoke on behalf of the Walker Campaign.

16. After the event in Perry, Mr. Schlapp was to return to Atlanta. Because Mr. Doe was then residing in Atlanta, he was tasked by the Walker Campaign to drive Mr. Schlapp back to Atlanta. Mr. Doe drove Mr. Schlapp back to Atlanta, and delivered Mr. Schlapp to his hotel, a Hilton Garden Inn (the “Hotel”), between approximately 2:00 p.m. and 3:00 p.m.

The Afternoon and Evening of October 19, 2022

17. Mr. Schlapp was scheduled to attend a Walker Campaign event the following day in Macon, Georgia, which is approximately a 2-hour drive from Atlanta. It was agreed that Mr. Doe would pick Mr. Schlapp up at the Hotel at approximately 7:30 a.m. on October 20, 2022, and would drive him to Macon. To that end, and to

² See <https://www.conservative.org/2022/10/07/midterms-tour/> (“CPAC Chairman Matt Schlapp will be hitting the campaign trail in support of Republican candidates during the final 30-day push to build the big red wave. Chairman Schlapp will be traveling to support Kansas GOP gubernatorial candidate Derek Schmidt, Arizona gubernatorial candidate Kari Lake, Georgia senate candidate Herschel Walker, and North Carolina senate candidate Ted Budd. Additional trips will be announced.”).

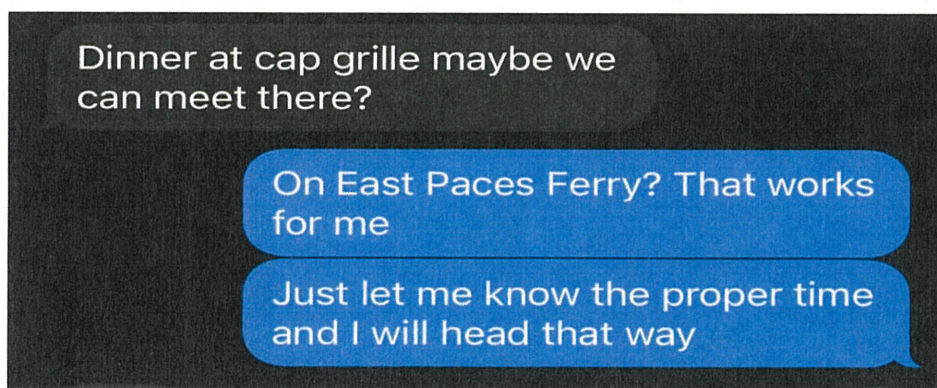
ensure they could communicate the following morning, Mr. Doe and Mr. Schlapp exchanged telephone numbers.

18. Shortly after Mr. Doe delivered Mr. Schlapp at the Hotel after the drive from Perry, at approximately 3:14 p.m., Mr. Schlapp initiated the following text message exchange with Mr. Doe (Mr. Doe's responses being right-justified):



19. Mr. Doe accepted Mr. Schlapp's invitation because Mr. Schlapp is a very prominent and well-connected person in conservative politics, and Mr. Doe was eager to make a connection that might further his career and connections in the conservative political movement.

20. At approximately 5:31 p.m., Mr. Schlapp initiated another text message exchange with Mr. Doe:



21. Mr. Doe arrived at the restaurant, where Mr. Schlapp was meeting with a donor, while Mr. Schlapp was still at dinner. While Mr. Schlapp finished his dinner with the donor, Mr. Doe, a sports fan, sat at the restaurant's bar, and watched a portion of a National Basketball Association game between the Memphis Grizzlies and the New York Knicks. Mr. Schlapp eventually joined Mr. Doe at the bar.

22. The bar at the restaurant was quiet and uncrowded. Mr. Schlapp and Mr. Doe spoke generally about sports and made other small talk. Mr. Schlapp made clear that he wanted to go to a livelier place.

23. In response to Mr. Schlapp's desire to go elsewhere, Mr. Doe suggested Manuel's Tavern, an historic bar in Atlanta with deep political connections, which he believed that Mr. Schlapp would find interesting. Mr. Doe drove Mr. Schlapp to Manuel's Tavern.

24. At Manuel's Tavern, Mr. Schlapp sat unusually close to Mr. Doe, such that his leg repeatedly contacted and was in almost constant contact with Mr. Doe's leg. Mr. Schlapp was so close to Mr. Doe that he bumped into Mr. Doe's torso where Mr. Doe had a Sig Sauer handgun holstered, asked about it, and professed an unfamiliarity with this weapon and firearms generally. Mr. Schlapp also encouraged Mr. Doe to have more drinks, despite the fact that Mr. Doe was driving. Mr. Schlapp's behavior made Mr. Doe uncomfortable, and Mr. Doe sought to create distance between he and Mr. Schlapp. Mr. Doe turned his attention to a television broadcast of a Major League Baseball playoff game between the New York Yankees and the

Houston Astros to avoid Mr. Schlapp's seeming advance. Mr. Schlapp noticed Mr. Doe's discomfort, and ask Mr. Doe why he would not look at him.

25. After Mr. Schlapp persisted in his uncomfortably close contact with Mr. Doe, to escape the situation, Mr. Doe pointed out that they had to leave early in the morning for Macon, and offered to return Mr. Schlapp to the Hotel.

26. On the drive from Manuel's Tavern to the Hotel, Mr. Schlapp placed his hand on Mr. Doe's leg. Mr. Doe was frozen with shock, mortification, and fear from what was happening, particularly given Mr. Schlapp's power and status in conservative political circles.

27. Mr. Doe did not consent to Mr. Schlapp placing his hand on Mr. Doe's leg.

28. Then, Mr. Schlapp moved his hand and began aggressively fondling Mr. Doe's genital area in a sustained fashion. Again, Mr. Doe was frozen with fear and panic from what was happening.

29. Mr. Doe did not consent to Mr. Schlapp's fondling of his genital area.

30. When they reached the Hotel, Mr. Schlapp invited Mr. Doe to come to his hotel room. Mr. Doe declined the invitation.

31. In the late night hours of October 19, 2022, and into the early morning hours on October 20, 2022, Mr. Doe informed several trusted persons about what had occurred. He also recorded a video recounting the events.

The Morning of October 20, 2022

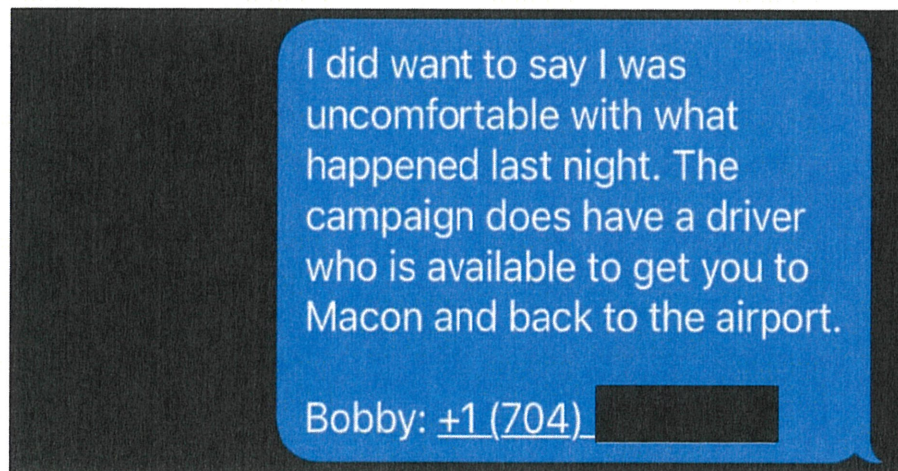
32. Shortly after Mr. Doe left Mr. Schlapp at the Hotel, at approximately 12:06 a.m. on October 20, 2022, and while Mr. Doe was enroute home, Mr. Schlapp called Mr. Doe, ostensibly to confirm that the arrangements for Mr. Doe to pick Mr. Schlapp up for the drive to Macon.

33. Mr. Doe returned, alone, to his home in Atlanta. He was shocked, mortified, horrified, and devastated by Mr. Schlapp's advances and unwanted and non-consensual touching and fondling.

34. Also on the morning of October 20, 2022, Mr. Doe informed senior officials with the Walker Campaign about what had transpired with Mr. Schlapp. Walker Campaign officials made arrangements for Mr. Schlapp to be transported to Macon by someone other than Mr. Doe, and otherwise provided support to Mr. Doe.

35. Just before the time at which Mr. Doe was expected to pick up Mr. Schlapp for the drive to Macon, at approximately 7:26 a.m., Mr. Schlapp sent Mr. Doe a text message stating "I'm in the lobby."

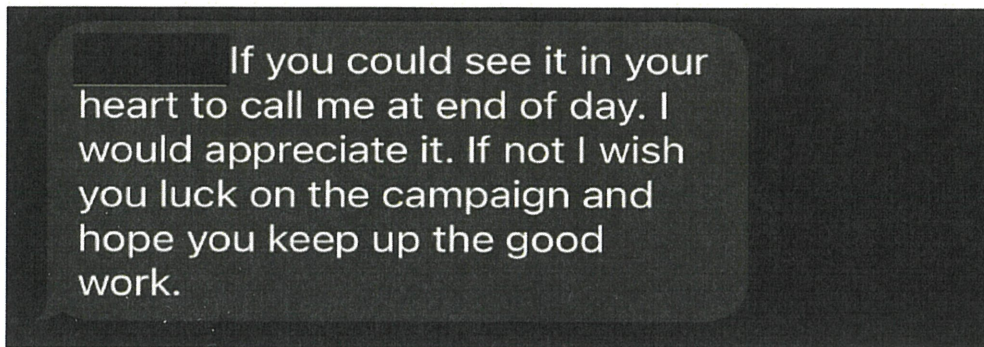
36. Mr. Doe responded to this text message:



37. Mr. Schlapp immediately responded by sending a text message asking Mr. Doe to “Pls give me a call.” Mr. Doe did not call Mr. Schlapp.

38. Then, Mr. Schlapp attempted twice to call Mr. Doe at approximately 7:53 a.m. Mr. Doe did not answer these calls. Mr. Schlapp attempted a third call to Mr. Doe at approximately 8:09 a.m. Mr. Doe did not answer this call either.

39. Mr. Schlapp attempted one further time on October 20, 2022 to communicate with Mr. Doe, by text message sent at approximately 12:12 p.m.:³



40. Mr. Doe did not respond to this text message.

41. Upon information and belief, Mr. Schlapp did not attend the Walker Campaign event in Macon as planned.

January 2023

42. On January 5, 2023, the *Daily Beast* published an article about Mr. Schlapp’s sexual battery of Mr. Doe, titled “Herschel Walker Staffer: Matt Schlapp ‘Groped’ My Crotch.” See www.thedailybeast.com/herschel-walker-staffer-matt-schlapp-groped-my-crotch?ref=wrap.

³ Mr. Doe’s first name is redacted.

43. After the *Daily Beast* article was published, other news outlets, large and small, picked up the story; some parroting the *Daily Beast* story, and others including additional corroboration and facts.

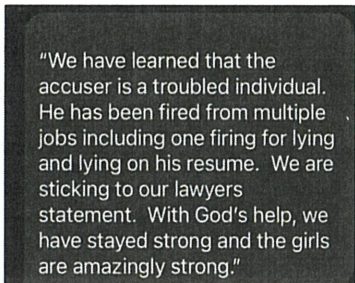
44. Much of the reporting on and user comments regarding the reporting pointed out that Mr. Schlapp and Ms. Schlapp had made virulently anti-homosexual comments in the past, and accordingly painted them as hypocrites. *See, e.g.*, <https://www.newsweek.com/matt-schlapp-blasted-hypocrite-after-report-he-groped-male-staffer-1771897/>.

45. In response to the barrage of criticism that Mr. Schlapp and Ms. Schlapp received as a result Mr. Schlapp's sexual battery of Mr. Doe, and the media storm related thereto, Mr. Schlapp and Ms. Schlapp – Mr. Schlapp through the use of lawyers and hired guns, and Ms. Schlapp directly – began a campaign to impugn Mr. Doe's character.

46. Shortly before publication of the *Daily Beast* article, a lawyer purporting to speak for Mr. Schlapp, Charles Spies, stated to the *Daily Beast* reporter that Mr. Doe's allegations were an "attack" and the "attack is false." Mr. Spies' statement on behalf of Mr. Schlapp was false, as the *Daily Beast* article accurately recounted, in all material respects, the facts surrounding Mr. Schlapp's sexual battery of Mr. Doe.

47. Mr. Spies' statement on behalf of Mr. Schlapp was therefore false and defamatory.

48. Ms. Schlapp joined in making false statements designed to falsely impugn Mr. Doe's reputation. On or about January 7, 2023, to a neighborhood group chat or text, Ms. Schlapp posted the following:

A screenshot of a text message on a dark background. The text is white and reads: "We have learned that the accuser is a troubled individual. He has been fired from multiple jobs including one firing for lying and lying on his resume. We are sticking to our lawyers statement. With God's help, we have stayed strong and the girls are amazingly strong."

"We have learned that the accuser is a troubled individual. He has been fired from multiple jobs including one firing for lying and lying on his resume. We are sticking to our lawyers statement. With God's help, we have stayed strong and the girls are amazingly strong."

49. Mr. Doe never has been fired for lying or lying on his resume, and Ms. Schlapp's statement was false and defamatory.

50. Confederates of Mr. Schlapp and Ms. Schlapp also joined with them in seeking to impugn Mr. Doe's reputation. One such confederate, who upon information and belief was acting in concert with Mr. Schlapp and Ms. Schlapp, was Ms. Wren, an organizer of the January 6, 2021 "Stop the Steal" rally that led to the attempted insurrection at the United States Capitol. Ms. Wren posted largely false information about Mr. Doe on Twitter, and peddled that false information to reporters.

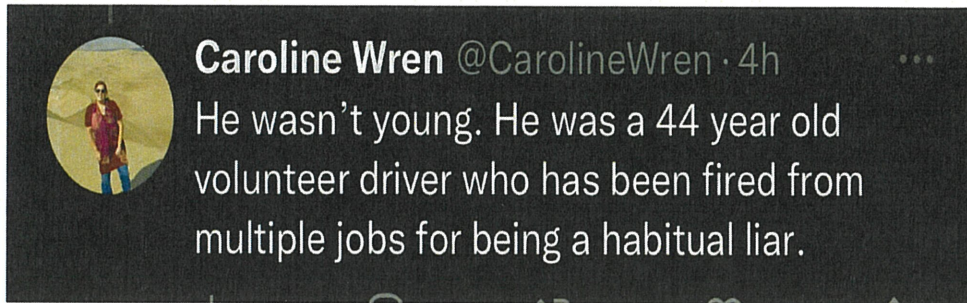
51. For instance, on January 11, 2023, Ms. Wren posted on Twitter with respect to a CNN report discussing Mr. Schlapp's sexual battery of Mr. Doe:

A screenshot of a Twitter post. On the left is a circular profile picture of a woman in a red shirt and blue pants standing on a beach. To the right of the picture, the text reads: "Caroline Wren @CarolineWren · 1h 'the republican strategist alleges'. He's not a 'strategist', he was a 39 yr old volunteer driver who had been fired from multiple campaigns for lying and unethical behavior. @jamiangel knew this, chose not to print it, and is now reporting her lies on television. Shame on her."

Caroline Wren @CarolineWren · 1h
"the republican strategist alleges". He's not a "strategist", he was a 39 yr old volunteer driver who had been fired from multiple campaigns for lying and unethical behavior. @jamiangel knew this, chose not to print it, and is now reporting her lies on television. Shame on her.

52. Mr. Doe was not a volunteer driver. Nor was Mr. Doe “fired from multiple campaigns for lying and unethical behavior.” Both statements are false, and the latter statement is false and defamatory.

53. Also on January 11, 2023, Ms. Wren posted on Twitter:



54. Mr. Doe is not 44 years old. He was not a volunteer driver. Nor was Mr. Doe “fired from multiple jobs for being a habitual liar.” All three statements are false, and the latter statement is false and defamatory.

COUNT 1
(Battery – Mr. Schlapp)

55. The allegations contained in paragraphs 1 through 54 are incorporated herein as if fully set forth.

56. Mr. Schlapp, by placing his hand on Mr. Doe’s leg on the drive from Manuel’s Tavern to the Hotel, unlawfully and offensively touched Mr. Doe.

57. Mr. Schlapp’s placing of his hand on Mr. Doe’s leg on the drive from Manuel’s Tavern to the Hotel proceeded from rudeness and/or lust.

58. Mr. Schlapp, by aggressively fondling Mr. Doe’s genital area in a sustained fashion unlawfully and offensively touched Mr. Doe.

59. Mr. Schlapp’s aggressive fondling of Mr. Doe’s genital area in a sustained fashion proceeded from rudeness and/or lust.

60. The foregoing constitute battery by Mr. Schlapp upon Mr. Doe.

61. As a direct and proximate result of Mr. Schlapp's battery upon Mr. Doe, Mr. Doe suffered damages, including without limitation shock, mortification, horror, humiliation, and distress.

62. In committing the battery upon Mr. Doe, Mr. Schlapp acted under circumstances amounting to a willful and wanton disregard of Mr. Doe's rights, justifying an award of punitive damages.

COUNT 2
(Defamation – Mr. Schlapp)

63. The allegations contained in paragraphs 1 through 54 are incorporated herein as if fully set forth.

64. Mr. Schlapp, himself, has never publicly denied (because he cannot truthfully do so) Mr. Doe's account of the evening of October 19, 2022.

65. In the aftermath of the *Daily Beast* article and other news reports, Mr. Schlapp was desperate to try to discredit Mr. Doe's account of Mr. Schlapp's sexual battery.

66. To that end, Mr. Schlapp employed Mr. Spies and others to coordinate a campaign to discredit Mr. Doe.

67. The *Daily Beast* and other press accounts of Mr. Schlapp's sexual battery have been based almost entirely on Mr. Doe's account of Mr. Schlapp's behavior, corroborated by contemporaneous documentary and videographic evidence.

68. Nonetheless, Mr. Spies, acting as agent and attorney for Mr. Schlapp, made the following statement to the *Daily Beast* and other media outlets:

This appears to be now the twelfth Daily Beast piece with personal attacks on Matt Schlapp and his family. The attack is false and Mr. Schlapp denies any improper behavior. We are evaluating legal options for response.

69. By stating that the *Daily Beast* article was a “personal attack” and that the “attack is false,” Mr. Spies, acting for Mr. Schlapp, necessarily meant to impart and did impart that Mr. Doe’s account of the sexual battery by Mr. Schlapp is a fabrication and lie.

70. Mr. Schlapp has actual knowledge that his sexual battery of Mr. Doe actually occurred, and his knowledge of the battery is superior to the knowledge of all other persons excepting Mr. Doe.

71. Mr. Schlapp’s statement through Mr. Spies has a precise meaning – that Mr. Doe’s allegations are a fabrication – which is readily understood to any reader.

72. Mr. Schlapp’s statement through Mr. Spies is capable of being proven true or false.

73. The context of Mr. Schlapp’s statement through Mr. Spies makes it unlikely or impossible to believe the statement to be one of mere opinion.

74. Mr. Schlapp’s statement through Mr. Spies is false and defamatory.

75. Mr. Schlapp’s false and defamatory statement is defamatory *per se* in that it accuses Mr. Doe of dishonesty, which in turn would impute to Mr. Doe an unfitness to perform the duties of an office or employment of profit, and a want of integrity in the discharge of the duties of such an office or employment, and prejudice Mr. Doe in his profession and trade.

76. As a direct and proximate result of Mr. Schlapp's false and defamatory statement, Mr. Doe suffered damages, including without limitation embarrassment, humiliation, distress, and reputational harm.

77. Mr. Schlapp's false and defamatory statement through Mr. Spies was made with knowledge by Mr. Schlapp that the statement was false or with a reckless disregard for the truth, so as to justify an award of punitive damages.

78. Mr. Schlapp's statement was not privileged.

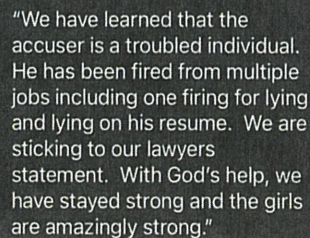
**COUNT 3
(Defamation – Ms. Schlapp)**

79. The allegations contained in paragraphs 1 through 54 are incorporated herein as if fully set forth.

80. In the aftermath of the *Daily Beast* article and other news reports, Ms. Schlapp was desperate to try to discredit Mr. Doe's account of Mr. Schlapp's sexual battery.

81. To that end, Ms. Schlapp embarked in an attempt to harm Mr. Doe's reputation by making false statements about him.

82. In the wake of the news reports about her husband's sexual battery of Mr. Doe, Ms. Schlapp stated to certain of her neighbors:



"We have learned that the accuser is a troubled individual. He has been fired from multiple jobs including one firing for lying and lying on his resume. We are sticking to our lawyers statement. With God's help, we have stayed strong and the girls are amazingly strong."

83. Mr. Doe has not been fired from a job for lying.

84. Mr. Doe has not been fired from a job for lying on his resume.

85. Ms. Schlapp's statements are capable of being proven true or false.

86. The context of Ms. Schlapp's statements makes it unlikely or impossible to believe either of the statements to be one of mere opinion.

87. Ms. Schlapp's statements are false and defamatory.

88. Ms. Schlapp's false and defamatory statements are defamatory *per se* in that they accuse Mr. Doe of dishonesty, which in turn would impute to Mr. Doe an unfitness to perform the duties of an office or employment of profit, and a want of integrity in the discharge of the duties of such an office or employment, and prejudice Mr. Doe in his profession and trade.

89. As a direct and proximate result of Ms. Schlapp's false and defamatory statements, Mr. Doe suffered damages, including without limitation embarrassment, humiliation, distress, and reputational harm.

90. Ms. Schlapp's false and defamatory statement was made by Ms. Schlapp with a reckless disregard for the truth, so as to justify an award of punitive damages.

91. Ms. Schlapp's statements were not privileged.

**COUNT 4
(Conspiracy)**

92. The allegations contained in paragraphs 1 through 91 are incorporated herein as if fully set forth.

93. Mr. Schlapp and Ms. Schlapp acted in concert and together, and upon information and belief in concert with Ms. Wren, to accomplish the defamation of Mr.

Doe by making the same false statements in various fora, in an effort to impugn and damage Mr. Doe.

94. Mr. Schlapp acted in furtherance of the conspiracy by making, through Mr. Spies, the false and defamatory statement set forth in paragraph 46, *supra*.

95. Ms. Schlapp acted in furtherance of the conspiracy by making the false and defamatory statements set forth in paragraph 48, *supra*.

96. Ms. Wren acted in furtherance of the conspiracy by making the false and defamatory statements set forth in paragraphs 51 and 53, *supra*.

97. As a direct and proximate result of Mr. Schlapp's and Ms. Schlapp's conspiracy between themselves and others, Mr. Doe suffered damages, including without limitation embarrassment, humiliation, distress, and reputational harm.

98. The conspiracy and the defamatory statements made in furtherance thereof were made with knowing falsity or with a reckless disregard for the truth, so as to justify an award of punitive damages.

WHEREFORE, Mr. Doe requests the following relief:

A. With respect to Count 1, that judgment be entered in his favor, and against Mr. Schlapp, in the amount of \$3,500,000, plus punitive damages in the amount of \$350,000, plus prejudgment and post-judgment interest, plus his costs;

B. With respect to Count 2, that judgment be entered in his favor, and against Mr. Schlapp, in the amount of \$1,500,000, plus punitive damages in the amount of \$350,000, plus prejudgment and post-judgment interest, plus his costs;

C. With respect to Count 3, that judgment be entered in his favor, and against Ms. Schlapp, in the amount of \$1,500,000, plus punitive damages in the amount of \$350,000, plus prejudgment and post-judgment interest, plus his costs;

D. With respect to Count 4, that judgment be entered in his favor, and against Mr. Schlapp and Ms. Schlapp, jointly and severally, in the amount of \$1,500,000, plus punitive damages in the amount of \$350,000, plus prejudgment and post-judgment interest, plus his costs; and

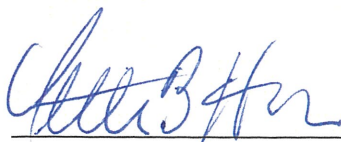
E. That Mr. Doe be awarded such other and further relief as the Court may deem appropriate.

Jury Demand

Pursuant to Rule 3:21(b), Mr. Doe demands a trial by jury as to all issues so triable.

Respectfully submitted,

JOHN DOE
By Counsel



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