

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANTHONY BOBULINSKI,

Plaintiff,

v.

DANIEL GOLDMAN,

Defendant.

Case No.: _____

DEMAND FOR A JURY
TRIAL

COMPLAINT

1. Defendant, Daniel Goldman, has repeatedly lied about Plaintiff, Anthony Bobulinski, saying that Mr. Bobulinski has used a Trump campaign-paid lawyer to lie since October 2020, spreads Russian disinformation, and is a Trump campaign plant. Defendant lied solely to serve his political agenda by deliberately besmirching the character of Mr. Bobulinski and to protect Joseph Biden. Defendant's assertions are unequivocally false and defamatory. Mr. Bobulinski demanded a complete retraction and deletion of his posts made on X (formerly Twitter) on March 26, 2024, which Defendant wholly ignored. Accordingly, Mr. Bobulinski seeks to hold Defendant accountable for his malicious and knowing lies.

PARTIES AND JURISDICTION

2. Plaintiff Anthony Bobulinski is an individual who is not a resident or citizen of the State of New York or Washington, D.C.

3. Defendant Dan Goldman is an individual who is a resident and citizen of the State of New York, and is employed in Washington, D.C.

4. This Court has subject matter jurisdiction over this cause of action pursuant to 28 U.S.C. § 1332 as there is complete diversity of citizenship, and the amount in controversy exceeds \$75,000.

FACTUAL BACKGROUND

Background of Mr. Bobulinski

5. Mr. Bobulinski is a decorated Navy veteran and successful businessman.

6. For over six years, Mr. Bobulinski was an officer in the United States Navy's elite Naval Nuclear Power Training Command ("NNPTC") as a decorated Master Training Specialist Instructor. He later served as the Command's Chief Technology Officer where he held a Q security clearance from the Department of Energy and from the National Security Agency. When he left NNPTC, Mr. Bobulinski was the top-ranked Direct Input Officer ("DIO") in the entire Command, as is documented in his final Navy Fitness Report ("FITREP").

7. Mr. Bobulinski's awards and decorations include the Navy/Marine Corps Commendation Medal, the Navy/Marine Corps Achievement Medal, and the National Defense Service Medal.



8. After his military service, Mr. Bobulinski became involved in business ventures and eventually met Joseph Biden in May 2017. Hunter Biden subsequently engaged Mr. Bobulinski as his business partner to serve as the CEO of SinoHawk Holdings, a company designed to find investments in the United States. Ultimately, a partnership was formed between the Chinese Communist Party/Chairman Ye through their surrogate, China Energy Company Limited (“CEFC”), a CCP-linked Chinese energy conglomerate, and the Biden Family.

9. Leaked emails eventually raised questions about whether Hunter Biden was profiting off his father’s name when he was Vice President of the United States.

10. The emails showed that Joseph Biden was aware of Hunter’s business dealings with foreign nations and even personally benefited from them. They contradicted Joseph Biden’s several prior assertions that he had no awareness of, or involvement with, his son’s business dealings.

11. An email dated May 13, 2017, discussed remuneration packages regarding a business deal with a now-bankrupt Chinese company proposing an equity split of “20” for “H” and “10 held by H for the big guy?”

12. The reference to “the big guy” was used by James Gilliar to refer to Joseph Biden in emails to maintain confidentiality. Hunter Biden referred to his father as “my chairman.”

13. Mr. Bobulinski, who considers himself to be a political moderate and previously donated to members of the Democratic Party, decided to put principles above political party. He confirmed the veracity of the emails to the United States

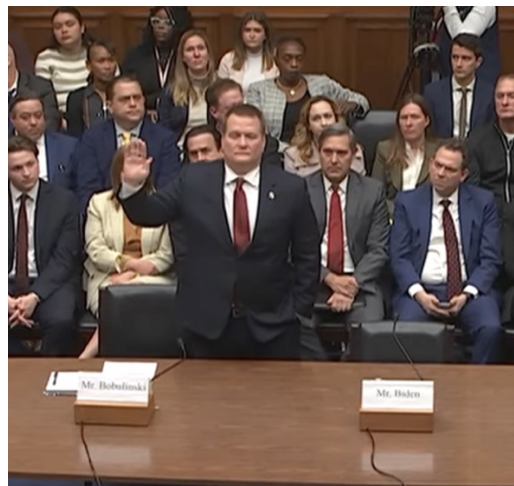
Senate and that Joseph Biden was aware of, and involved with, his son's business dealings with foreign nations, and that the Biden family, including Joseph Biden, accepted money from foreign nations.

14. Indeed, Mr. Bobulinski came forward because of the lies Joseph Biden was telling, and continues to tell today, about his involvement with, and financial benefit from, his son's business dealings.

15. Mr. Bobulinski confirmed that he saw, firsthand, that Hunter Biden would frequently go to his father for his approval or advice for various business deals.

16. Additionally, during the course of their business relationship, Mr. Bobulinski grew concerned that Hunter Biden was using the Chinese company as his "personal piggy bank," and Mr. Bobulinski needed to take certain steps at the board level to minimize that risk.

17. On March 20, 2024, Mr. Bobulinski was sworn in to testify before the United States House of Representatives Committee on Oversight and Accountability as to the conduct he witnessed by Joseph Biden, Hunter Biden, and Biden Family business associates. A photograph of that moment is depicted below.



Defendant's History

18. Defendant is a Democratic congressman in the United States House of Representatives from New York's 10th congressional district.

19. Defendant comes from one of the wealthiest families in America. He is the heir to the Levi Strauss & Co. fortune and is currently one of the wealthiest members of Congress.

20. Elected to office in 2022, Defendant's campaign raised millions of dollars and received maximum contributions from multiple billionaires, which Defendant leveraged to effectively squash his competition.

21. Defendant is also a lawyer, having graduated from law school in 2005.

22. Prior to running for Congress, Defendant served as lead counsel for the House impeachment managers during the Senate trial of President Trump, in which he was ultimately acquitted.

23. Defendant serves on the United States House of Representatives Committee on Oversight and Accountability. Mr. Bobulinski had been interviewed by the Committee prior to publicly testifying before the Committee on March 20, 2024. Mr. Bobulinski agreed to do so, in part, to accommodate Mr. Hunter Biden's prior dramatic demands to testify before the Committee publicly as well as to answer any and all questions about the truth of the corruption within the Biden Family. The Committee then scheduled a public hearing. Notwithstanding, Hunter Biden failed to appear. His empty chair is shown in the above photograph.

Defendant's Lies

24. On March 21, 2024, shortly after Mr. Bobulinski's most recent appearance before the United States House of Representatives Committee on Oversight and Accountability, Defendant posted on X, "Tony Bobulinski has used a Trump campaign-paid lawyer to make false allegations since October 2020."

25. Defendant also wrote on March 21, 2024, that Mr. Bobulinski's testimony was "Russian disinformation."

26. On February 14, 2024, Defendant directed a post to Oversight Chairman, James Comer, while discussing Mr. Bobulinski, writing, "You brought in a Trump campaign plant to peddle your same lies."

27. Each of the statements is unequivocally false.

28. It is a matter of fact that since 2020, when Mr. Bobulinski first started speaking publicly against the Biden Family's corruption, he has spent over \$500,000 of his own money on legal fees. Neither President Trump, nor any Trump affiliated entities, have ever paid for Mr. Bobulinski's legal fees. Rather, he did because of his strong sense of civic duty.

29. Further, Mr. Bobulinski is not affiliated with the Trump campaign in any way. He has never lied to Congress, or anyone else, from the inception of when he first started speaking publicly in 2020 about Biden Family improprieties with the Chinese Communist Party and affiliated organizations. Mr. Bobulinski's testimony, despite Defendant's delusional assertion, is not "Russian disinformation,"—the ever-present garbage so often used by Democrats invariably reflecting their lack of any

substantive support based in reality. Rather, Mr. Bobulinski is a patriotic American. He is neither a Republican, nor a Trump campaign plant, and is most definitely not working with the Russians to spread disinformation and lie to the American people.

30. Defendant deliberately and maliciously made these statements, outside the scope of his employment, in an attempt to discredit Mr. Bobulinski's testimony and to besmirch Mr. Bobulinski's character. It was a mistake for Defendant to believe he was cloaked with immunity for his defamatory statements.

31. Defendant made these statements impromptu on X, outside of Congress, and used none of Congress' resources. He did so not to inform the public with facts, but rather, for the unforeseeable act to attack Mr. Bobulinski with lies to try and repair the image of Joseph Biden in the wake of evidence of corruption presented against the Biden Family. Defendant's conduct was solely to achieve his personal vendetta against Mr. Bobulinski for speaking out against the Biden family. Defendant's post of February 14, 2024, was even made outside of work hours, made at 8:03 AM.

32. By letter dated March 26, 2024, attached as Exhibit A, counsel for Mr. Bobulinski demanded that Defendant retract and delete his defamatory comments.

33. Defendant neither responded to, nor complied with, Mr. Bobulinski's demand.

34. Defendant was aware at the time he made these false statements that they would inflame a segment of the country against Mr. Bobulinski and would falsely cause persons to disbelieve Mr. Bobulinski's sworn testimony.

35. As a member of the Committee on Oversight and Accountability, Defendant was acutely aware that Mr. Bobulinski has not accepted money from President Trump, or any persons or entities affiliated with President Trump, to pay his legal bills. Defendant was further aware Plaintiff has not told any lies, is not a Trump campaign plant, and is certainly not spreading Russian disinformation. Notwithstanding, Defendant has been working in tag-team fashion with fellow Oversight Committee member, Rep. Jamie Raskin, in a social media blitz of defamatory posts deliberately and maliciously besmirching the character of Mr. Bobulinski.

36. Defendant made these lies against Mr. Bobulinski to defame and discredit his character and punish anyone who dared speak up against the Biden Family for its many improprieties with the Chinese Communist Party and affiliated organizations.

CAUSES OF ACTION
COUNT I
(Defamation and Defamation *Per Se*)

37. Plaintiff incorporates by reference the above paragraphs as though set forth fully herein.

38. Defendant has repeatedly defamed Mr. Bobulinski on X, outside the scope of his employment, by claiming that Mr. Bobulinski uses a Trump campaign-paid lawyer to lie and make false allegations, that he has lied about the Bidens since October 2020, that his sworn testimony is Russian disinformation, and that he is a Trump campaign plant.

39. Defendant's assertions are categorically false.

40. Defendant published the defamatory statements on X, knowing that they were false or with reckless disregard for the truth. Given Defendant's employment, and position with the Democratic party, he knew Mr. Bobulinski was telling the truth and knew Mr. Bobulinski was doing so for the benefit of the American people. Defendant deliberately acted with reckless disregard for those truths.

41. The defamatory statements constitute defamation *per se* because by claiming that Mr. Bobulinski lied and made false allegations, Defendant accused Mr. Bobulinski of committing perjury and violating 18 U.S.C. § 1001, for lying to Congress. Further, by claiming that Mr. Bobulinski is spreading Russian disinformation, and is a Trump campaign plant, while using a Trump campaign-paid lawyer, Defendant sought to destroy Mr. Bobulinski's credibility, and it subjected him to hatred, distrust, ridicule, contempt, and/or disgrace by a certain segment of America and the world which lives in an alternate reality. The statement inherently causes people to view Mr. Bobulinski as untrustworthy by negatively implying that his testimony is bought and paid for without the assistance of any extrinsic evidence.

42. The defamatory statements have directly and proximately caused Mr. Bobulinski to suffer significant damages, including damage to his reputation, humiliation, embarrassment, and mental anguish, as well as to his business ventures, and profession. These damages were foreseeable, are long-lasting, and ongoing, and will be suffered in the future.

43. Defendant published the defamatory statements knowingly, intentionally, willfully, wantonly, and maliciously, with intent to harm Mr. Bobulinski, or in blatant disregard for the substantial likelihood of causing him harm and were part of a well-established malicious pattern by Defendant, thereby entitling Plaintiff to an award of punitive damages.

44. As a direct and proximate result of the misconduct of Defendant, Mr. Bobulinski is entitled to compensatory, special, and punitive damages, in the sum of \$10,000,000.00, or such greater amount as is determined by the jury.

COUNT II
(Defamation by Implication)

45. Plaintiff incorporates by reference the above paragraphs as though set forth fully herein.

46. On March 21, 2024, Defendant wrote, “Tony Bobulinski has used a Trump campaign-paid lawyer to make false allegations since October 2020.”

47. In doing so, Defendant intentionally omitted important context that neither President Trump, nor any entities affiliated with President Trump, are paying for Mr. Bobulinski’s legal fees at all, and certainly not to lie.

48. Indeed, Defendant intentionally omitted this context in an attempt to discredit Mr. Bobulinski by nonsensically trying to tie together a true fact that a PAC has paid his lawyer’s firm, Elections LLC, in the past for work completely unrelated to his lawyer’s representation of Mr. Bobulinski, in an attempt to imply defamatory innuendo and an understanding that President Trump is paying for Mr. Bobulinski’s

testimony before congress. In so doing, Defendant's defamation by implication sought to discredit Mr. Bobulinski.

49. Defendant's omission of this context left a reasonable viewer with the impression that President Trump or his campaign is paying for Mr. Bobulinski's legal fees, and ultimately, his testimony.

50. Defendant intentionally created this inference to salvage his political party to the detriment of Mr. Bobulinski and his pursuit to expose the truth of the Biden Family corruption.

51. The inference made is defamatory as it leads to hatred, distrust, ridicule, contempt, and/or disgrace for Mr. Bobulinski. Indeed, it caused not only a large segment of the nation which despises all things Trump regardless of reality, but also rational and reasonable viewers, not to trust or find credibility with Plaintiffs.

52. Defendant made the statement with malice. He intended and endorsed the inference because he wanted to continue to discredit Mr. Bobulinski in order to serve Defendant's personal political agenda.

53. As a direct and proximate result of the misconduct of Defendant, Mr. Bobulinski is entitled to compensatory, special, and punitive damages, in the sum of \$10,000,000.00 or such greater amount as is determined by the jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Anthony Bobulinski respectfully requests this Court to enter a judgment in his favor and grant relief against Defendant as follows:

- a. An award of compensatory, special, and punitive damages of twenty million dollars (\$20,000,000.00);
- b. An award of Plaintiff's costs associated with this action, including but not limited to their reasonable attorneys' fees and expenses; and
- c. Such other and further relief as the Court deems just and appropriate to protect Plaintiff's rights and interests.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Dated: April 5, 2024

ANTHONY BOBULINSKI
By Counsel

Respectfully submitted,

/s/ Jesse Binnall
Jesse R. Binnall (Bar VA022)
John C. Sullivan (*pro hac vice*)
Jared J. Roberts (*pro hac vice*)
BINNALL LAW GROUP, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
Phone: (703) 888-1943
Fax: (703) 888-1930
Email: jesse@binnall.com
jcs@binnall.com
jared@binnall.com

Counsel for Plaintiff

Exhibit A



**BINNALL
LAW GROUP**

P: 703-888-1943 • F: 703-888-1930
717 King Street, Suite 200 • Alexandria, VA 22314

Jesse R. Binnall
PARTNER

D: 571-467-6566
E: jesse@binnall.com

March 26, 2024

BY ELECTRONIC MAIL

The Honorable Daniel S. Goldman
United States House of Representatives
245 Cannon House Office Building
Washington, D.C. 20515
Email: daniel.goldman@mail.house.gov

***Re: Anthony Bobulinski – RETRACTION DEMAND AND PRESERVATION
NOTICE***

Dear Representative Goldman,

This firm represents Anthony Bobulinski. You are hereby given notice that litigation is imminent due to recent defamatory comments you made about Mr. Bobulinski on X (formerly Twitter). Accordingly, you should identify and preserve all hard copy and electronic documents and data that relate, in any way, to the subject matter of this dispute.

Specifically, on March 21, 2024, you wrote, “Tony Bobulinski has used a Trump campaign-paid lawyer to make false allegations since October 2020.” To be clear, as you are well aware given your position, Mr. Bobulinski has not told any lies about his firsthand knowledge of the Biden family. Your statement, as though it were a matter of fact, that Mr. Bobulinski has lied to federal investigators, as well as Congress, is defamatory per se and will not be tolerated. Further, President Trump’s campaign has never paid Mr. Bobulinski’s legal fees. In fact, Mr. Bobulinski has paid over \$500,000, in legal fees to numerous lawyers in law firms out of his own pocket since 2020. If you do not immediately delete the post from X and publicly retract your statement on X within five days of receiving this letter, we will file suit against you.

You are not entitled to any immunity for this defamatory statement. The Speech and Debate Clause comes from Article I, Section 6, Clause 1 of the United States Constitution, and it includes in relevant part: “for any Speech or Debate in either House, they shall not be questioned in any other Place.” U.S.C.A. CONST. art. I, § 6, cl. 1.

While the courts has been careful to interpret this clause “broadly to effectuate its purposes,” *United States v. Johnson*, 383 U.S. 169, 180 (1966), and expanded its protections to include anything “generally done in a session of the House by one of its members in

Retraction Demand and Preservation Notice

March 26, 2024

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relation to the business before it,” *Kilbourn v. Thompson*, 103 U.S. 168, 204 (1880) (*see Johnson*, 383 U.S. at 179), they have been careful to provide defined contours for the outer boundaries of the scope of the privilege. *See Chastain v. Sundquist*, 833 F.2d 311, 314 (D.C. Cir. 1987) (“The Speech or Debate Clause protects all lawmaking activities undertaken in the House and Senate, but affords no constitutional immunity beyond its carefully defined scope.”).

The focus of the Speech or Debate clause is to “protect[] only ‘purely legislative activities,’—i.e., acts inherent in the legislative process. *Chastain v. Sundquist*, 833 F.2d 311, 314 (D.C. Cir. 1987) (citing *United States v. Brewster*, 408 U.S. 501, 512, 92 S. Ct. 2531, 2537, 33 L.Ed.2d 507 (1972)). Therefore, anything that is not a legislative activity will not be protected.

In *Hutchinson v. Proxmire*, 443 U.S. 111 (1979), the Supreme Court determined that “the transmittal of ... information by individual Members in order to inform the public ... is not a part of the legislative function or the deliberations that make up the legislative process.” *Chastain*, 833 F.2d at 314 (citing *Hutchinson*, 443 U.S. at 133). Indeed, the D.C. Circuit has found that a Member of Congress that publishes “even an exact copy of a speech delivered in Congress” loses his constitutional protection. *Chastain*, 833 F.2d at 314 (citing *Hutchinson*, 443 U.S. at 133) (press releases are “primarily means of informing those outside the legislative forum”).

Here, you chose to publish an excerpt of a congressional proceeding with your own defamatory commentary. This republication and especially the commentary are not protected because they are not within the scope of the Speech or Debate clause, nor are they protected opinion of a fair report of the proceedings. Rather, your statement is a derogatory falsehood, rendering it legally actionable. Accordingly, Mr. Bobulinski demands an immediate retraction in a new post on X and deletion of the above referenced post from X. Your pattern of maliciously defaming Mr. Bobulinski is well established and will not be tolerated.

This demand is not intended to be a complete recitation of all applicable law and/or facts underlying Mr. Bobulinski’s claims against you and shall not be deemed to constitute a waiver or relinquishment of any of Mr. Bobulinski’s rights or remedies, whether legal or equitable, all of which are hereby expressly reserved, including but not limited to the recovery of costs and attorneys’ fees.

You are required to identify, preserve, and hold in compliance with current legal standards all hard copy and electronically stored information, documents, and data. In this context, “documents and data” is used in the broadest sense and means all hard copy and electronically stored writings, information (including emails and text messages), spreadsheets, drawings, graphs, charts, photographs, and other retrievable data (whether recorded, taped, or coded electronically, electrostatically, electromagnetically or otherwise),

Retraction Demand and Preservation Notice

March 26, 2024

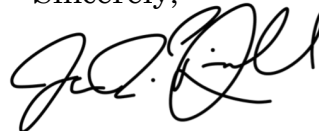
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including the original and any non-identical copy and every draft and proposed draft of all correspondence (including emails and text messages), memoranda, notes of meetings, facsimiles, voice mail, reports, transcripts or notes of telephone conversations, notebooks, minutes, notes, tests, reports, analyses and studies, all together with any attachments and enclosures.

Documents and data of any type that relate to the potential litigation arising from your statements, whether hard copy or electronic, draft, or final, should not be discarded, destroyed, modified, or altered in any way and should be held and preserved in their current format until this litigation is resolved. Normal document retention policies must be suspended. If there is any question about whether any hard copy or electronic document, data or file is related to this lawsuit, for the sake of good order, you should assume the broadest possible application of this hold to your materials mandated by current legal standards of preservation such that you should identify, hold, and preserve it.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jesse R. Binnall", written in a cursive style.

Jesse R. Binnall

JS-44 (Rev. 11/2020 DC)

I. (a) PLAINTIFFS Anthony Bobulinski (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF 88888 (EXCEPT IN U.S. PLAINTIFF CASES)	DEFENDANTS Daniel Goldman COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small>
(c) ATTORNEYS (FIRMNAME, ADDRESS, AND TELEPHONE NUMBER) Jesse R. Binnall, Binnall Law Group, PLLC 717 King Street, Suite 200, Alexandria, VA 22314 (703) 888-1943	ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)	III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY!																												
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IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<input type="radio"/> A. Antitrust <input type="checkbox"/> 410 Antitrust	<input checked="" type="radio"/> B. Personal Injury/Malpractice <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> C. Administrative Agency Review <input type="checkbox"/> 151 Medicare Act <u>Social Security</u> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction Any nature of suit from any category may be selected for this category of case assignment. *(If Antitrust, then A governs)*
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<u>Real Property</u> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <u>Personal Property</u> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement <u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)	<u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 <u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <u>Other Statutes</u> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA) <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="radio"/> I. FOIA/Privacy Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)	
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)	
V. ORIGIN <input checked="" type="radio"/> 1 Original Proceeding <input type="radio"/> 2 Removed from State Court <input type="radio"/> 3 Remanded from Appellate Court <input type="radio"/> 4 Reinstated or Reopened <input type="radio"/> 5 Transferred from another district (specify) <input type="radio"/> 6 Multi-district Litigation <input type="radio"/> 7 Appeal to District Judge from Mag. Judge <input type="radio"/> 8 Multi-district Litigation – Direct File				
VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.) Defamation and Defamation Per Se, Defamation by Implication				
VII. REQUESTED IN COMPLAINT		<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ 20,000,000 JURY DEMAND:	Check YES only if demanded in complaint YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
VIII. RELATED CASE(S) IF ANY		(See instruction)	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If yes, please complete related case form
DATE: 04/05/2024		SIGNATURE OF ATTORNEY OF RECORD: /s/ Jesse R. Binnall		

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil coversheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia



ANTHONY BOBULINSKI

Plaintiff(s)

v.

DANIEL GOLDMAN

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

Daniel Goldman
United States House of Representatives
245 Cannon House Office Building
Washington, D.C. 20515

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jesse R. Binnall
Binnal Law Group, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

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

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset