

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

PATRICK NATHANIEL REED,
c/o 22 Philbrook Way
Woodlands, TX, 77382

And

835 Golden Bear Drive
Kissimmee, FL, 34747

Plaintiff,

v.

BRANDEL EUGENE CHAMBLEE,
1800 E Cactus Rd, Unit 32
Scottsdale, AZ, 85259

And

TGC, LLC
d/b/a Golf Channel
1 Blachley Road
Stamford, CT, 06902

And

DAMON HACK
1 Blachley Road
Stamford, CT, 06902

And

BENJAMIN SHANE BACON
1 Blachley Road
Stamford, CT, 06902

And

EAMON LYNCH
1 Blachley Road
Stamford, CT, 06902

COMPLAINT

And

GOLFWEEK
1000 Legion Place, Suite 725
Orlando, FL 32801

And

GANNETT CO., INC
7950 Jones Branch Drive
McLean, Virginia 22107

Defendants.

I. INTRODUCTION

Plaintiff PATRICK NATHANIEL REED (“Mr. Reed”) or (“Plaintiff”) brings this action against Defendants BRANDEL EUGENE CHAMBLEE (“Chamblee”), DAMON HACK (“Hack”), BENJAMIN SHANE BACON (“Bacon”), TGC, LLC d/b/a GOLF CHANNEL (“Golf Channel”), EAMON LYNCH (“Lynch”), GOLFWEEK, and GANNETT CO., INC (“Gannett”) acting in concert as joint tortfeasors, jointly and severally, in this civil action for general defamation, defamation per se, defamation by implication and civil conspiracy, injurious falsehoods, and tortious interference as a result of Defendants’ causing actual damages, compensatory damages, and giving rise to punitive damages, including continuing and aggravated harm to Mr. Reed’s professional, business, and personal reputation and livelihood. As grounds therefore, Mr. Reed alleges as follows:

II. JURISDICTION AND VENUE

1. This Court has diversity jurisdiction over this case pursuant to 28 U.S.C. § 1332, as the parties are completely diverse in citizenship and the amount in controversy exceeds \$75,000.

2. Venue is proper pursuant to 28 U.S.C. § 1391(b)(3) in that this is a district in which a substantial part of the events or omissions giving rise to Plaintiff's claim occurred, as a significant portion of the defamatory statements at issue were made on a podcast hosted by Horace Langley, and which featured Defendant Chamblee, which was recorded in and broadcast from Ponte Vedra, Florida in this district.

III. PARTIES

3. Mr. Reed is an individual, natural person who is a citizen of the state of Texas and a resident of both Florida and Texas. He has residences in both in Kissimmee, Florida and The Woodlands, Texas.

4. Defendant Chamblee is an individual, natural person who is on information and belief a citizen of the state of Arizona.

5. Defendant Hack is an individual, natural person who is on information and belief a citizen of the state of Connecticut.

6. Defendant Bacon is an individual, natural person who is on information and belief a citizen of the state of Connecticut.

7. Defendant Lynch is an individual, natural person who is on information and belief a citizen of the state of Connecticut.

8. Golf Channel is a limited liability corporation incorporated under the laws of Delaware and with its headquarters in the states of Connecticut and Florida.

9. Golfweek is a subsidiary of Gannett and is headquartered in Orlando, Florida.

10. Gannett is Golfweek's parent company and is headquartered in McLean, Virginia.

IV. STANDING

11. Mr. Reed has standing to bring this action because he has been directly affected and victimized by the unlawful conduct complained herein. His injuries are proximately related to the intentional and malicious conduct of Defendants, each and every one of them acting in concert jointly and severally, as joint tortfeasors.

V. FACTS

BACKGROUND FACTS

12. Mr. Reed is a professional golfer who began his career after winning back-to-back NCAA Championships at Augusta State University and started his professional career by “Monday-qualifying” for PGA Tour events in 2012 with his then fiancé and now wife caddying for him. The duo earned Mr. Reed his PGA Tour Card through qualifying school (q-school) for the PGA Tour in 2012. Together, they won their first PGA tournament in their first season on the PGA Tour at The Wyndham Championship in 2013 at Sedgefield Country Club in North Carolina. Mr. Reed was 23 years old. Since his first win, Mr. Reed has gone on to win a total of 9 PGA Tournaments, including his first major championship victory in 2018, at The Masters in Augusta, Georgia, at the age of 27. He became a dual member of the PGA Tour and the European Tour in 2015 and successfully made it to each tour’s grand finale for the best players in the world, The Tour Championship and the Race to Dubai. He is not only a Masters Champion, but also a 9-Time PGA Tour champion, an eight-time United States Team member, an Honorary Lifetime Member of the DP World Tour, and has had a very successful playing career, having just turned 32 years-old. He also started The Team Reed Foundation which serves many local and nationwide charities and foundations in the Houston area as well as nationwide. He hosts the Patrick Reed American Junior Golf Association’s (“AJGA”) Tournament every year in The Woodlands, Texas and his AJGA Tournament is the most heavily-awarded event in

AJGA history. He also supports and gives to the APGA which helps support African American and other minority golfers to compete and win at the highest level of professional golf and helps support up-and-coming golfers by providing custom golf equipment through grindworksUSA and the Team Reed Foundation. He was a voting member on the PGA Tour and consistently made it to the Tour Championship every year from 2014 through 2021. Mr. Reed has been the only American to play on both the DP World Tour (“European Tour”) and the PGA Tour since 2015. He is also the only 2-Time American Olympian Golfer for the United States, having competed in the 2016 Rio De Janeiro Olympic Games and the 2020 (2021) Olympic Games in Japan. Mr. Reed is a global professional golfer and, to sum it all up, his 9 PGA Tour wins consist of: Two World Golf Championships, two FedEx Cup Play-Off Events, and a major championship at the 2018 Masters Tournament. Mr. Reed is currently one of the most successful and accomplished professional golfers in the world since beginning his career at age 22. He was ranked as high as six (6) in the Official World Golf Ranking as late as 2020 and has remained a top player in the world since earning his PGA Tour card in 2013 and has continued to proudly represent the United States worldwide on team events and individually since 2014.

13. And to put this all in perspective, Mr. Reed is the youngest World Golf Champion ever, beating out Tiger Woods’ record by 26 days. Mr. Reed won in his debut World Golf Championship event at Trump International’s “Blue Monster” in Doral, Florida at the age of 23. Last, but hardly least, Mr. Reed is also only the fourth American golfer to receive an Honorary Lifetime Membership on the European Tour, the previous three Americans to receive such an honor were the late Arnold Palmer, Jack Nicklaus, and Tom Watson. Reed also holds three PGA Tour records.

14. Mr. Reed has represented the United States of America eight (8) times in the Ryder Cup, Presidents Cup and the Olympic Games. In 2014 and 2016, Mr. Reed was the leading point scorer for the American Ryder Cup team, which earned him the nickname “Captain America.”

15. Despite his exceptional world-class golfing achievements, in June of 2022, Mr. Reed was constructively terminated as a member of the PGA Tour, as a result of threats made and actions taken by its Commissioner Jay Monahan (“Monahan”) and the PGA Tour and he later signed with LIV Golf.

16. To compound matters, both before and in furtherance of the threats made and actions taken by the PGA Tour and Monahan to constructively terminate Mr. Reed, Defendants have conspired as joint tortfeasors for and with the PGA Tour, its executives, and Monahan to engage in a pattern and practice of defaming Mr. Reed, misreporting information with actual knowledge of falsity and/or reckless disregard of the truth, that is with actual and constitutional malice, purposely omitting pertinent key material facts to mislead the public, and actively targeting Mr. Reed since he was 23 years old, to destroy his reputation, create hate, and a hostile work environment for him, with the intention to discredit his name and accomplishments as a young, elite, world-class golfer, and the good and caring person, husband and father of two children that he is. It is well-known on tour that Mr. Reed has been abused and endured more than any other golfer from fans or spectators who have been allowed to scream obscenities, only to be glorified by Defendant Golf Channel for doing so, because it gets the Defendants “clicks”, viewership, ratings and increased revenue. For Defendants, it does not matter how badly they destroy someone’s name and life, so long as they rake in more dollars and profit.

17. These calculated, malicious, false and/or reckless attacks have had a direct effect on Mr. Reed's and his family's livelihood and he has suffered major damages through the loss of not just one, but multiple multi-million dollar sponsorship deals and his business endeavors as set forth below, as a result of the continuous harm that Defendants have inflicted and continue to inflict upon Mr. Reed with defamatory publications that are false and/or made with a reckless disregard for the truth.

18. As a direct and proximate result of the lies and defamatory statements set forth below, Mr. Reed has lost existing sponsorship deals, and has had numerous prospective sponsorship and business deals not come to fruition due to the severe damage to his reputation intentionally and maliciously caused by the Defendants.

19. As evidence of this, Mr. Reed has far fewer sponsorships now than he had prior to the Defendants' concerted attack on his reputation, and far fewer sponsorships than other golfers who have reached his level of professional success, which is detailed above.

20. Furthermore, Mr. Reed and his wife, Justine Reed ("Mrs. Reed"), own and manage grindworksUSA, which is the domestic distributor for grindworks, a Japanese golf equipment company. The sales of grindworksUSA's golf clubs and accessories are based on Mr. Reed's reputation and success as one of the top professional golf players in the world. The clubs are named after Mr. Reed and his children, so consumers know that Mr. Reed is intricately connected with grindworksUSA's clubs, their designs, and accessories. Thus, when the Defendants destroy Mr. Reed's reputation with lies, defamatory statements and injurious falsehoods as set forth below, they are also intentionally and maliciously destroying the sales of grindworksUSA's products.

21. Since the malicious lies and defamatory statements and other illegal acts set forth in this Complaint were made and perpetrated by Defendants, grindworksUSA has experienced a decline in current and prospective sales.

22. Mr. Reed and Mrs. Reed also own and manage Team Reed Enterprises, Inc., which provides marketing and business services in the golf industry, including but not limited to endorsement contracts, appearance fees, operating the Team Reed Foundation and fundraising, branding and marketing, as well as logistics, accounting services, performance statistics, and consulting services in the golf industry. Again, since the malicious lies, defamatory statements and other illegal acts as set forth in the Complaint were made and perpetrated by Defendants, Team Reed Enterprises, Inc has suffered reputational and monetary damages accordingly.

23. Because Mr. Reed's name and identity are so closely intertwined with grindworksUSA and Team Reed Enterprises, Inc., statements denigrating, disparaging, and defaming, and other illegal acts as pled herein concerning Mr. Reed are also necessarily statements and illegal acts of and concerning grindworksUSA and Team Reed Enterprises, Inc.'s goods and services and are maliciously designed to severely damage and harm not just Mr. Reed's, but also the businesses he and his wife own and operate.

24. Mr. Reed has always sought to, and continues to seek to, avail himself and his businesses to Florida, which is a huge golf market for future sales and services.

25. In this regard, Defendant Chamblee, a former professional golfer, who fell far short of ever rising to the accomplished level of Mr. Reed, and the primary current analyst for Golf Channel, has become Golf Channel's mouthpiece and agent to push this defamatory and other illegal agenda as pled herein, and inflict severe damage to Mr. Reed, LIV, and other golfers signed with LIV.

26. Golf Channel is firmly ensconced as the PGA Tour's and the DP World Tour's co-conspiratorial agent and admitted "partner" in the words of PGA Tour Commissioner Monahan as recently at the 2022 President's Cup, to push its anticompetitive agenda and message to the public.

27. This was admitted by Monahan in a recent appearance on none other than Golf Channel, where he referred to the "partnership" between the PGA Tour and Golf Channel, stating that he was "really proud of the partnership that we [the PGA Tour and the Golf Channel] share."¹

28. Defendants are acting in concert as joint tortfeasors with and as agents on behalf of the PGA Tour and DP World Tour, which views LIV as its primary competitor. Thus, Defendants and the PGA Tour and the DP World Tour are defaming and smearing and harming with other illegal acts as pled herein anyone associated with LIV—including Mr. Reed, one of its most prominent athletes—in order to try to maintain their monopolistic hold on professional golf, and therefore continue to substantially profit, to the tune of an estimated \$1.522 billion in revenue for the PGA Tour alone in 2022.² Thus, Defendants literally have billions of reasons to continue to maliciously defame Mr. Reed, LIV, and other golfers signed with LIV, particularly since Golf Channel has highly lucrative contracts with the PGA Tour and DP World Tour and Defendants are fearful that another major network, such as Fox Sports, will acquire the rights to broadcast and cover LIV tournaments and events and compete with Golf Channel, drawing away advertising and substantial revenue.

¹ *Jay Monahan doesn't expect peace between PGA Tour, LIV, Golf Channel*, Sep. 21, 2022, YouTube, available at: <https://www.youtube.com/watch?v=7wmZVDzlWRo>

² See Mike Purkey, *The PGA Tour Is On a Spending Spree and We Know Who's Going to Get the Bill*, Sports Illustrated, Dec. 21, 2021, available at: <https://www.si.com/golf/news/the-pga-tour-is-on-a-spending-spree-and-we-know-whos-gonna-get-the-bill>

29. As a result, Defendants, conspiring and acting in concert as joint tortfeasors to defame and harm through injurious falsehoods and tortious interference Mr. Reed and his companies, colleagues, family and other professional and personal relationships, have set out to destroy LIV along with its golf professionals, such as Mr. Reed, by damaging them financially and in terms of their good will, reputation and standing in the golfing community, professionally and personally, as well as their advancement through competing in Major Championships and World Golf Championships.³

30. As a direct and proximate result of the defamation and other illegal acts set forth below and herein, Defendants, acting in concert as joint tortfeasors with the PGA Tour and the DP World Tour and their commissioners, as well as other agents, surrogates and assigns, have maliciously caused a hostile workplace environment for Mr. Reed, spilling over to, endangering and harming his colleagues and family. This hostile workplace, which has been made to occur in the tournaments and events which Mr. Reed attends and participates in to earn a living for

³ The Official World Golf Ranking board (“OWGR”), which in conjunction with Defendants has conspired to restrain trade on behalf of the PGA Tour and DP World Tour, was put the question in 2015 if the OWGR was biased, after three years of the PGA Tour and DP World Tour fighting not to change the system. As a result, a new system was conjured up and rolled out the week of August 14, 2022, by creating a world ranking system that depletes the amount of DP World Tour points by 33 percent and Asian Tour Official World Ranking points awarded (OWGR) by 66%. Yet the PGA Tour doesn’t even stand to lose one percent in the new OWGR system, making itself the most powerful tour and thus weakening every other tour. Jay Monahan sits on the board of the OWGR (which is a major conflict of interest) and has voting rights on decisions for OWGR to award world ranking points. The LIV Golf Tour lacks the ability to award OWGR points to their players. These OWGR points effectively determine which players qualify for major and world golf championships, for those players not otherwise exempt. Thus, the PGA Tour’s effective ability to earn and award OWGR points to its players would be significantly impacted if LIV players received the points they should be awarded by a fair, unbiased panel. Because if LIV players did receive the points they should earn for their strength of field, it would reduce the PGA Tour’s and DP World Tour’s competitive advantage, monopoly power and monopoly over professional golf.

himself and his family, has been manifested, only in part, by induced personal attacks on him, his colleagues and his family by persons attending these tournaments and events. These induced personal attacks have in turn harmed Mr. Reed's health and performance at tournaments and events, where he has to be escorted and protected by at least two professional bodyguards, despite his excellent if not unsurpassed record, which record would be even much greater without the disruption and emotional distress caused by these personal attacks to him, his colleagues and his family.

31. These induced and continuing personal attacks include, but are not limited to: "Now on the tee the excavator!," "You suck!," "You f.... ing suck!," "You jackass!," "You coward!," "Shovel!," "Why don't you dig a grave and bury yourself in it!," "You piece of shit!," "No one likes you!," "Everyone hates you Reed!," "Good luck digging yourself out of this one!," "Where are your parents coward?!", "You cheater!," "Cheat!," "Everyone hates you cheater!," "You're going to miss this you cheater!," "You cheat in college and on tour and you're a piece of shit!," "Beat the cheater's ass!," "Sorry Webb for having to play with the cheat! Who did you piss off?!", "Why don't you introduce your children to their grandparents you ungrateful bitch?!" This is just a sampling of what Defendants maliciously and intentionally caused and furthered with actual malice. These personal attacks occur frequently while Mr. Reed is actively preparing to make his golf shot, or during the golf shot, much less thereafter as he is walking to his next golf shot, as well as lining up and making putts on the green, which putts require a high degree of concentration.

32. Again, it has gotten so bad that Mr. Reed is forced to use security guards to protect himself and his family when in public and at LIV Golf Tournaments, where he is assigned two professional security guards before, during and after each round.

FACTS PERTAINING TO LIV AND ITS COMPETITORS

33. LIV is a professional golf tour operating company which is financially backed by the Public Investment Fund of Saudi Arabia (“PIF”). LIV has its principal place of business in West Palm Beach, Florida, and is seeking to compete against the PGA Tour and DP World Tour both domestically and abroad.

34. LIV’s CEO, Greg Norman has publicly stated, “[w]e are not a political organization. We are here to play golf, serve fans, grow the game, and give additional opportunities to players. I also have seen firsthand the good that golf can do around the world, and Saudi Arabia is no different.”

35. In addition to LIV, the PIF invests in numerous corporations domestically and worldwide, including but not limited to, Uber, Boeing, Facebook, Citigroup, Disney, Bank of America, Capcom, Nexon, Electronic Arts, Take-Two Interactive, Activision Blizzard, and Berkshire Hathaway.

36. The PIF also purchased Newcastle United F.C. on the English Premier League in 2021.

37. LIV held its inaugural professional golf tournament from June 9-11, 2022 at the Centurion Club in Hertfordshire, England, as well as another tournament from June 30 - July 2, 2022 at Pumpkin Ridge Golf Club in Portland, Oregon, and a tournament at Trump National Golf Club Bedminster on from July 29 -31, 2022. More tournaments have taken place in Boston, Massachusetts from September 2 – 4, 2022 and Chicago, Illinois from September 16 – 18, 2022, and others are scheduled for 2022, 2023 and beyond. The final event for 2022 will take place in Florida at Trump National Golf Club Doral from October 27 – 30, 2022.

38. Clearly viewing LIV as a substantial threat, both the PGA Tour and the DP World tour have taken adverse anti-competitive actions against golfers who participated in LIV tournaments.

39. For instance, on or around June 9, 2022, the PGA Tour announced the suspension of seventeen (17) of its own professional golfers who participated in the LIV Golf's inaugural tournament.

40. On June 24, 2022, the DP World Tour, the PGA Tour's joint venture partner, announced that it was fining each of its own professional golfers who participated in the LIV's inaugural golf tournament in the amount of approximately \$125,000 and banned them from the Scottish Open, Barbasol Championship, and the Barracuda Championship, with more sanctions to follow for any other golfer who joins LIV in the future. This ban was later temporarily enjoined

41. As a result of this anticompetitive and illegal conduct by the PGA Tour and DP World Tour and their commissioners Monahan and Pelley, many professional golfers were essentially forced into a choice between whether to play on the LIV Tour or on the PGA Tour and DP World Tour.

42. For a litany of reasons—whether it be Mr. Reed's constructive termination as result of threats by the PGA Tour and Monahan, dissatisfaction with the policies of the PGA Tour and DP World Tour, the PGA Tour's failure to support Mr. Reed and his colleagues and family against defamation, injurious falsehoods, tortious interference and threats, financial benefit, as or even as simple as plain personal preference for themselves and their families—Mr. Reed, and many top professional golfers, including but not limited to, Phil Mickelson, Brooks Koepka, Dustin Johnson, Bryson DeChambeau, Patrick Reed, Cameron Smith, Kevin Na,

Charles Schwartzel, Ian Poulter, Lee Westwood, and Sergio Garcia, to name just a few world class golfers, have decided to join LIV.

FACTS PERTAINING TO DEFENDANTS' DEFAMATION AND OTHER CAUSES OF ACTION

43. In retaliation for Mr. Reed's decision to sign with LIV, Defendants, conspiring and acting in concert as joint tortfeasors with the PGA Tour, DP World Tour, and OWGR, have engaged in a pattern and practice of maliciously defaming, engaging in injurious falsehoods and tortious interference of and concerning Mr. Reed, as well as LIV and other golfers who signed with LIV.

44. On information and belief, this pattern and practice of malicious defamation and other actionable wrongs as pled herein by the Defendants has been done at the behest of, and at the direction of the PGA Tour and DP World Tour, in order to try to eliminate LIV and its golfers as competitors so that the PGA Tour and Golf Channel can continue to rake in billions of dollars in revenue.

45. It is clear that where the Defendants are making false and misleading statements regarding LIV and its players, it is reasonably understood by an objective viewer/listener that the Defendants are making these statements of and concerning Mr. Reed, as well as other golfers signed to LIV.

46. Indeed, Mr. Reed has become, not by choice but due to media-driven narrative, a "lightning rod" and therefore a frequent target of the Defendants and others in the media in order to defame, disparage and harm LIV's other golfers and LIV as a whole.

47. The Defendants know that if they can destroy the reputation of Mr. Reed, which they themselves have inserted as the face of the "controversy" surrounding LIV, they can destroy the reputations and financial and other well-being of each and every golfer signed with LIV, and

therefore LIV itself. This will allow them to achieve their goal of removing LIV as a competitor so that they can continue to profit obscenely.

48. Each and every one of the defamatory publications, injurious falsehoods and tortious interference set forth below were intentionally published and perpetrated by the Defendants in the state of Florida, where the offending acts were accessed, read, opened, and viewed by numerous third-party Florida residents and citizens. Florida and this district are in effect the capitol of professional golf and golf in general for the United States. Its year-round warm climate, and the fact that Florida is the third largest state, with a huge media market in the golf industry make the Sunshine State a prime target for Defendants' defamatory and other illegal acts in their effort to destroy Mr. Reed, other LIV players and LIV in general. Indeed, the last LIV tournament for 2022 will take place at Trump National in Doral, Florida, and a myriad of PGA Tour events also take place in this district and Florida in general. Thus, the PGA Tour and LIV are going head-to-head in the Sunshine State.

49. In sum, each and every one the Defendants have engaged in "continuous and systematic" activities in Florida, as they are all members of golf media. Florida is considered to be the golf capital of the United States. Furthermore, as the Complaint has alleged that the Defendants were acting in concert with and at the direction of the PGA Tour, their "continuous and systematic" contacts with Florida are even more evident given that the PGA Tour is headquartered in Ponte Vedra, Florida, in this judicial district.

50. Defendants Chamblee, Bacon, Lynch, and Hack regularly travel to Florida, and specifically this judicial district, to provide media coverage for golf events being held in the Ponte Vedra area and elsewhere in Florida.

51. Defendants Golf Channel, Golfweek, and Gannet heavily circulate their media and do substantial business in Florida, and specifically this judicial district. They have deliberately exploited this judicial district, since it is one of the golf capitals of the United States and the world, and where the PGA Tour headquarters is located.

Defamatory Publication #1 – Horace Langley’s Podcast

52. In a video published on June 14, 2022, Defendant Chamblee, at the direction of and as an agent of Golf Channel and PGA Tour and DP World Tour, appeared on a podcast with Horace Langley, who goes by the name “Froggy,” where he published the following numerous malicious and defamatory statements of and concerning Mr. Reed.⁴ This podcast was filmed and broadcasted into and from this district by Defendant Chamblee in and from Ponte Vedra, Florida.

53. *First*, Chamblee states, “ **So if they’re aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he’s doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot,**” [Froggy] “**would you have played for Putin?**” [Chamblee in agreement] “**would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.**”

54. This statement is false, malicious, and defamatory on its face because it accuses Mr. Reed of aligning himself with a “tyrannical, murderous (sportswashing) leader.” Chamblee goes even further and states that LIV players such as Mr. Reed would have no problem playing golf for Stalin, Hitler, Mao Zedong, Pol Pot, and Vladimir Putin. This statement is false because Mr. Reed never aligned himself with a “tyrannical, murderous leader.” He is playing golf for

⁴ *Brandel Chamblee Thoughts of the LIV Golf Tour*, YouTube, Jun. 14, 2022, available at: <https://www.youtube.com/watch?v=xXxnqWJdWhI&t=339s>

LIV, which simply happens to be financed by the PIF, which has invested in and financed some of the nation's and the world's largest and respected corporations.

55. This would be akin to stating that LeBron James has aligned himself with a “tyrannical, murderous leader” because he plays in the National Basketball Association (“NBA”) which has intricate ties to the People's Republic of China⁵, whose government is accused of a current and ongoing genocide against the Muslim Uyghur people.⁶

56. *Second*, Chamblee states, **“I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...”**

57. This statement is false, malicious, and defamatory of and concerning Mr. Reed because it states that he is “destroying the professional game [of golf]” and that he has “tainted [his] legacy.in an irreparable way....” Mr. Reed is not destroying the game of golf—he simply chose to play for another league. Mr. Reed's legacy is also not tainted simply because he chose to play for another league. Professional athletes do this all the time. For instance, when Cristiano Ronaldo left Real Madrid in Spain for Juventus in Italy, his legacy was not tarnished or diminished in any way.

⁵ Mark Rainaru-Wada, Steve Fainaru, *ESPN analysis: NBA owners, mum on China relationship, have more than \$10 billion invested there*, ESPN, May 19, 2022, available at: <https://abcnews.go.com/Sports/espn-analysis-nba-owners-mum-china-relationship-10/story?id=84831238>.

⁶ Lorraine Boissoneault, *Is China Committing Genocide Against the Uyghurs?* Smithsonian Mag. Feb. 2, 2022, available at: <https://www.smithsonianmag.com/history/is-china-committing-genocide-against-the-uyghurs-180979490/>.

58. This statement, as well as other published statements set forth in the Complaint, are of and concerning Mr. Reed because it is clear to the objective listener and viewer that Chamblee is referring to all golfers who had signed with LIV, including Mr. Reed.

59. *Third*, Chamblee states that Mr. Reed is “**over there purely playing for blood money.**”

Defamatory Publication # 2 – Chamblee Article on Golf Channel

60. In a February 5, 2022 article written by Chamblee and published widely by Golf Channel titled “*Mickelson’s statements inaccurate and ironic: Obnoxious greed? Et tu, Phil?*” where Chamblee writes “[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players.” This published statement applies to and thus is of and concerning all LIV golfers, including Mr. Reed.

61. These related statements are false, malicious, and defamatory on their face, and falsely stating that someone is playing for blood money is patently and plainly defamatory because it creates the false implication that Mr. Reed is supporting acts of terrorism and/or human rights violations. This is false. Mr. Reed is simply playing golf, and he is being paid to do so by LIV. Mr. Reed has never accepted “blood money,” and in no way supports terrorism and/or human rights violations, or murder.

62. Again, these statements were meant to apply to and are of and concerning Mr. Reed because they apply to all golfers who have signed with LIV, including Mr. Reed.

63. Chamblee repeats the defamatory message in the prior statements by stating that Mr. Reed’s money is “**coming from the wrong place**” and that its “**good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail.**”

64. This statement is again false, malicious, and defamatory on its face, since it reiterates the “blood money” acceptance of Mr. Reed’s deal with LIV and furthers the completely false implication that Mr. Reed has aligned with a “tyrannical, murderous leader,” as set forth above. Chamblee takes this many steps further by calling Mr. Reed “evil,” simply for choosing to play golf for a competing league, which is not only patently false, but completely malicious and defamatory.

Defamatory Publication # 3 – Sky Sports News

65. Next, in a broadcast on Sky Sports News on or around June 10, 2022, Chamblee also made further false, malicious, and defamatory published statements of and concerning Mr. Reed.⁷

66. *First*, Chamblee stated, “[t]his is one of the saddest days in the history of golf. **Watching these players come together for money and show to the world...they are showing us that they are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.**”

67. This statement is false, malicious, and defamatory because it accuses and labels Mr. Reed, as well as other golfers who chose to sign with LIV, of being greedy, self-serving, and willfully blind. It creates the implication that Mr. Reed is greedy and solely driven by money and is willing to sacrifice everything he stands for in order to make money.

68. This is completely and utterly false with regard to Mr. Reed, as the primary reason that he chose to leave the PGA Tour was to be able to spend more time with his family and because he felt the PGA Tour made a conscious decision to ignore player requests and

⁷ Jason Daniels, *It makes me want to puke’ – Chamblee rips LIV Golf stars in scathing attack*, Golf WRX, Jun. 10, 2022, available at: <https://www.golfwrx.com/678264/it-makes-me-want-to-puke-chamblee-rips-liv-golf-stars-in-scathing-attack/>

suggestions over the years, while lining the pockets of its leadership such as its Commissioner Jay Monahan. The PGA Tour also willfully failed and refused to take actions to police those who would defame and seek to harm Mr. Reed at golf tournaments, as set forth above.

69. *Second*, Chamblee states, “[s]o when I hear these players say that they are ‘growing the game’... it makes me want to puke. They’re destroying the game. And they are destroying their reputations.”

70. Chamblee repeats and reiterates that defamatory message set forth above that LIV players such as Mr. Reed are “destroying” the game of golf simply by choosing to go play in a competing league. This creates the false impression that Mr. Reed and other golfers who signed to LIV do not care about the game of golf and are driven solely by the desire to make money and are therefore willing to destroy the game of golf to do so. Perhaps ironically, it is Chamblee and Golf Channel, in concert as joint tortfeasors and at the direction of PGA Tour and DP World Tour, who have shown that they only care about their financial “bottom line,” in trying to destroy Mr. Reed, LIV, and other golfers signed with LIV.

71. Defendants Chamblee and Golf Channel’s motive with regard to defaming Mr. Reed and other LIV golfers is to destroy the new league in its infancy to further Golf Channel’s highly lucrative broadcast contracts with the PGA Tour and DP World Tour.

Defamatory Publication # 4 – Chamblee on Golf Channel

72. Chamblee and Golf Channel have a long history of targeting Mr. Reed with their defamatory attacks, one of the most prominent examples of which occurred in 2021 when Chamblee falsely, and without any evidence, falsely accused Mr. Reed of intentionally cheating at the Farmers Insurance Open when Mr. Reed claimed embedded ball relief.

73. On or about February 1, 2021, Chamblee, appearing on Golf Channel made the following false, malicious, and defamatory statements of and concerning Mr. Reed.

74. Despite the fact that Mr. Reed was cleared to take a free drop and was absolved of any wrongdoing by PGA Tour officials, Chamblee publicly stated on Golf Channel **“I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.”**⁸

75. Chamblee stated that Mr. Reed **“violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.”** Thus, Chamblee accuses Mr. Reed of cheating and violating the code that golfers adhere to.

76. Chamblee even went so far as to defame and smear Mr. Reed’s morals and ethics over this incident, stating **“In the same way that there is a distinction between law and morality, there is a mark distinction, in this case, between what he was legally allowed to do and what he ethically appeared to be doing.”**

77. Lastly, as is Chamblee’s go-to theme in maliciously defaming Mr. Reed, he again accused Mr. Reed of destroying the game of golf, **“Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.”** Mr. Reed won the 2021 Farmers Insurance Open by a commanding 5 five shot victory at Torrey Pines, a Major Championship Golf Course, but Chamblee refused to talk about Mr. Reed’s great

⁸ Ryan Crombie, *Brandel Chamblee slaughters Patrick Reed over rules row*, Bunkered, Feb. 1, 2021, available at: <https://www.bunkered.co.uk/golf-news/brandel-chamblee-slaughters-patrick-reed-over-rules-row>

performance, using the opportunity to defame him even more, on a larger platform, after winning at one of the most iconic places in golf.

78. These statements are clearly malicious and defamatory because the matter simply involved an interpretation of a rule, and PGA Tour officials cleared Mr. Reed of any wrongdoing. To falsely state that Mr. Reed lacks ethics or morals, and that he is destroying the game of golf over this is clearly not only false, but completely and patently defamatory as well.

Defamatory Publication #5 – Hack and Bacon on Golf Channel

79. Similarly, on or about January 31, 2021, Hack and Bacon appeared on Golf Channel and made further false, malicious, and defamatory statements of and concerning Mr. Reed regarding the embedded ball incident at the 2021 Farmers Insurance Open.⁹

80. *First*, Hack says:

“I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.”

81. This statement is clearly malicious and defamatory because it is indisputable that Mr. Reed did nothing wrong, and he was unequivocally cleared by a PGA rules official of any wrongdoing. In an interview, the rules official stated, “[Mr. Reed] did everything he was entitled to do under the rules” and with regard to moving the ball, “The player is entitled to do that. He did call for a referee after the fact. But the player is entitled to do that. He did nothing wrong. Like I said, he marked it, he lifted it, and then he called for a ruling.” Thus, there is no room for

⁹Patrick Reed has lost the benefit of the doubt after another controversy, YouTube, Jan. 31, 2021 <https://www.youtube.com/watch?v=aIKObXgWpRY>

“interpretation” or even debate. It is indisputable that Mr. Reed followed the rules, so there is no “smoke,” as Hack falsely published.

82. *Second*, Bacon says, **“To me, this looks bad for Patrick Reed, a guy that has history of doing these things.”** This is absolutely false, malicious, and defamatory. Mr. Reed has never been found to have cheated. To say that he has a “history” of “doing these things”—which would clearly be interpreted as an accusation of cheating by any objective listener—is completely false, malicious, and defamatory. This statement is especially harmful because it falsely accuses Mr. Reed of being a habitual cheater.

83. *Third*, Hack repeats Bacon’s defamatory message, saying:

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

84. These statements are highly false, malicious, and defamatory, at a minimum by implication, because Hack is trying to portray Mr. Reed as a habitual cheater. However, with regard to the 2019 Hero World Challenge in the Bahamas, what the taped video of this matter showed was an unintentional error by Mr. Reed and he was not even in a sand trap but a waste area instead, which the PGA Tour also believed to be the case as evidenced by the fact the Mr. Reed was only assessed a two-stroke penalty and not disqualified from the tournament. Thus, there was never any finding of misconduct or cheating. And, even worse, Hack implies that Mr. Reed was kicked off the Georgia golf team for cheating, which is completely false, as there have

been public statements from 2015 from Mr. Reed's coaches at Georgia that they were completely unaware of any evidence of cheating by Mr. Reed.

Defamatory Publications #6 – Chamblee Twitter

85. In a widely published statement on Twitter, following the denial of a motion for temporary restraining order sought by LIV against the PGA Tour, on or about August 10, 2022, Defendant Chamblee again viciously defamed Mr. Reed and other LIV golfers, stating: **“Golf won today. Murderers lost.”** Consistent with his prior statements of and concerning Mr. Reed on Golf Channel and elsewhere, Defendant Chamblee defamed Mr. Reed as a “murderer” simply because he now plays on the LIV Golf Tour.

86. Chamblee doubled down on and compounded this defamatory statement of and concerning Mr. Reed in a tweet on or around June 26, 2022 saying, **“...either way, whether the money is against or in addition to guarantees its still blood money and you're still complicit in sportswashing.”**

87. Then, on September 2, 2022, Chamblee tweeted, **“[t]hese thugs are directed by the people who fund LIV golf...but LIV will pretend this video and so many others depicting human rights atrocities don't exist, but will happily post video of a golf event in Boston meant to sportwash these atrocities.”** This is again false, malicious, and defamatory because he directly calls Mr. Reed (and other LIV players) a “thug” simply because he plays golf for LIV. Chamblee also falsely raises the implication that Mr. Reed is complicit in “sportswashing” human rights atrocities.

88. On September 13, 2022, Chamblee tweeted, **“[b]y defectors I mean those who have turned their backs on the meritocracy of professional golf. I mean those who have sold their independence to a murderous dictator and those who have sued their fellow**

professionals so they can benefit from the tours they are trying to ruin.” This is false, malicious, and defamatory because Mr. Reed and the other LIV players did not sell their independence to a murderous dictator. Mr. Reed is also not trying to ruin the PGA Tour and DP World Tour. He is simply playing golf somewhere else.

89. On August 28, 2022, Chamblee tweeted, **“No. Wrong. But when they murdered, butchered and dismembered a dissenting journalists [sic] they began to care. Those same people behind that murder run this tour.”** This statement is false, malicious, and defamatory because Chamblee implies in a manner of and concerning Mr. Reed that Mr. Reed is complicit in the murder of dissenting journalists. He is not. He just plays golf.

90. On August 28, 2022, Chamblee tweeted **“[t]he IOC decides where the Olympics go...and there is a big difference between doing business in a country and directly for a murderous regime as LIV golfers are.”** This statement is false, malicious, and defamatory because Chamblee implies of and concerning Mr. Reed that Mr. Reed has chosen to work directly for a “murderous regime.” This is false. Mr. Reed works for LIV golf, which is a professional golf league that has never murdered anyone.

91. On August 30, 2022, Chamblee tweeted **“I can understand [Mohammed bin Salman Al Saud’s] regime wanting to become more than a petro[l] country & corporate interest to serve that part of the world. I can’t understand an individual working for him.”** This statement is false, malicious, and defamatory because Chamblee implies that Mr. Reed and Mr. Reed and other LIV players have chosen to work directly for a Mohammed bin Salman Al Saud’s regime This is false. Mr. Reed works for LIV golf, which is a professional golf league.

92. On September 2, 2022, Chamblee tweeted **“LIV golf is about hiding [the Saudi Arabian regime’s] human atrocities.”** This statement is false, malicious, and defamatory

because Chamblee implies of and concerning Mr. Reed that Mr. Reed is complicit in hiding human atrocities. Again, Mr. Reed just plays golf. He has never been complicit in hiding human atrocities, nor is it even possible to hide human atrocities through golf. The two are unrelated.

93. On August 28, 2022, Chamblee tweeted “[t]he criticism of LIV defectors is not that they are doing it for the money, that is easily understood, what is not so easily understood is why they would directly work for a regime that has such a reprehensible record on human rights.” This statement is false, malicious, and defamatory because Chamblee implies of and concerning Mr. Reed that Mr. Reed has chosen to work directly for a Mohammed bin Salman Al Saud’s regime This is false. Mr. Reed plays for LIV golf, which is a professional golf league.

94. On September 15, 2022, Chamblee tweeted “[t]he sportwashing paid to turn a blind eye to atrocities, the blight of LIV.” This is again false, malicious, and defamatory because it falsely raises the implication that of and concerning Mr. Reed he is complicit in “sportwashing” human rights atrocities.

Defamatory Publication # 7 – Eamon Lynch Article

95. Defendant Lynch, also a golf analyst on Golf Channel, acting in concert as joint tortfeasors with his co-Defendants to maliciously defame LIV players such as Mr. Reed, wrote an article titled *Lynch: PGA Tour’s war with LIV Golf enters ‘Return of the Jedi’ phase*¹⁰ that was published on August 24, 2022 and which contained numerous false, malicious, and defamatory statements of and concerning Mr. Reed.

¹⁰ Eamon Lynch, *Lynch: PGA Tour’s war with LIV Golf enters ‘Return of the Jedi’ phase*, Aug. 24, 2022, Golfweek, available at: <https://golfweek.usatoday.com/2022/08/24/lynch-pga-tour-news-liv-golf-leverage/>

96. This article was published on Defendant Golfweek’s website. Defendant Golfweek is owned in whole by Defendant Gannett.

97. These false, malicious, and defamatory statements include, but are not limited to 1) accusing LIV, and its golfers, prominently including Mr. Reed, as being the **“evil empire’s...Death Star,”** (2) accusing Mr. Reed and other LIV golfers of **“opt[ing] to cut and run for Saudi money,”** and (3) publishing that Mr. Reed and other LIV golfers had endured **“reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”**

98. These statements are all false, malicious, and defamatory, as set forth above, as they are the same “talking points” from which Chamblee and Golf Channel have already maliciously defamed Mr. Reed.

99. In addition to being an employee and contributor to Golfweek, Lynch not coincidentally is an employee of and contributor to Golf Channel, and co-hosts “Golf Today” on Golf Channel.

100. Thus, Lynch was acting in concert as joint tortfeasors with and at the direction of his co-Defendants.

Defamatory Publication #8 – Chamblee on Golf Channel September 20, 2022

101. On or about September 20, 2022, Chamblee appeared on Golf Channel to “discuss” whether LIV golfers should receive OWGR points. During this appearance, he made numerous further malicious and defamatory attacks on Mr. Reed and other golfers signed to LIV.¹¹

¹¹ *Should LIV Golf get world ranking points?*, Sep. 20, 2022, YouTube, available at: https://www.youtube.com/watch?v=olI_xayeEBE

102. First, Chamblee states, **“They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.”**

103. This is completely false, malicious, and defamatory because it creates the implication that Mr. Reed and other golfers signed to LIV are complicit and “in bed” with a government that has committed human rights violations and atrocities on the scale of South African apartheid. This is completely false. Mr. Reed simply plays golf for LIV.

104. *Second*, Chamblee repeatedly makes the statement that Mr. Reed, and other LIV golfers are “**bought**,” creating the false implication that Mr. Reed and other LIV golfers chose LIV solely for the money. As set forth above, this is flat out untrue, as there are numerous other reasons to sign with LIV, such as lifestyle or simple personal preference.

**FACTS PERTAINING TO DEFENDANTS’ CONTINUED MODUS OPERANDI AND
ILLEGAL COURSE OF CONDUCT**

105. Chamblee and Golf Channel have indeed engaged in a longstanding pattern and practice of maliciously defaming Mr. Reed, with a prominent example occurring in 2019 at the Hero World Challenge, with going so far as to publicly state on Golf Channel that “to defend what Patrick Reed did is defending cheating.”

106. In this same segment, Chamblee, appearing on the Golf Channel, also said:

- “The specter of having in their midst somebody who so flagrantly broke the rules; look, they made a deal with the devil when they put Patrick Reed on this team.”
- “They thought that whatever darkness he would bring to the team would be offset by his competitive fire. When was the last time a teammate stabbed everybody in the back as soon as the event was over? It was the last time there was a team event, and it was Patrick Reed.”

- “This was flagrant. No way, no camera angle you could look at. Anybody in the world of golf who watched this, it was repugnant video to anybody in the world of golf. ... As far back as this game goes, at its inception, is that you do not improve your lie. It’s not a new rule. It’s been a long time, I don’t care what camera angle, he will have known he’s improving his lie.”
- “The fact that he thinks there is no intent. I think his ego is as big as Jupiter. Ego monsters are irritated by facts, but they’re not moved aside from them. They think their ignorance of the facts, or their version, of what happened is greater than the truth.”
- “This is going to follow him around like the video of Nixon saying ‘I’m not a crook.’”

107. However, what the tape of this matter showed was an unintentional error by Mr. Reed, which the PGA Tour also believed to be the case as evidenced by the fact the Mr. Reed was only assessed a two-stroke penalty and not disqualified from the tournament.

108. In the same segment, Chamblee, appearing on the Golf Channel went even further and knowingly and/or recklessly falsely alleged that Mr. Reed engaged in improper and dishonest conduct in the past:

The echoes of his past which he hoped that the media members wouldn’t pen or use a keyboard, he just did with a wrecking ball. He did that. And his teammates going back to the University of Georgia. His coach going back to the University of Georgia. Augusta. They all talked about how they didn’t view him as a good teammate, and that he played loose and fast with the rules.

109. This statement was clearly both false and malicious, as Chamblee and Golf Channel had access to and knew of public sworn statements by Mr. Reed’s college coach, Josh Gregory, and USA golf team coach, Chris Haack, from 2015 that they were completely unaware of even a modicum of evidence that Mr. Reed had cheated.

110. This even forced Mr. Reed’s counsel at the time to issue a cease-and-desist letter to Chamblee to warn him to stop maliciously defaming Mr. Reed—a message that Chamblee and his conspirators at Golf Channel and the PGA Tour and DP World Tour have clearly ignored to their peril.

111. As a direct and proximate result of Chamblee and Golf Channel's bizarre if not jealous and sick fixation on destroying Mr. Reed's reputation by trying to fabricate the story that he is somehow a "cheater," Mr. Reed and his family have been subjected to a never-ending barrage of abuse at not only golf tournaments, but even in their everyday lives. Mr. Reed's children have even been tormented and bullied due to the Defendants' campaign to destroy his reputation, good will, and him financially and personally.

112. This is because Chamblee and Golf Channel's reach is enormous, and every time Chamblee does one of his defamatory "hot takes" for attention, notoriety, and profit, it is republished by many of the largest publications in the world.

113. Indeed, even a quick Google search of Chamblee's history of making defamatory statements of and concerning Mr. Reed results in pages and pages of republications from some of the largest names not only in sports—as just a few examples, Sports Illustrated, ESPN, Bleacher Report—but also in traditional mainstream news media, such as The Washington Post, Reuters, Newsweek, CNN, and Fox News. This is notwithstanding the fact that nearly every single golf-centered website also republishes these statements, thereby collectively resulting in millions upon millions of people who view Chamblee's and Golf Channel's false, malicious, and defamatory statements each time that they are made.

114. For instance, as reported by Fox Sports, US Senator Dick Durban of Illinois tweeted a republication of the Defendants' defamatory message, "This weekend, a golf glove will try and cover a blood-stained hand as the LIV golf tournament comes to Chicago in the Saudi government's continued, desperate attempt to clean up its image."¹²

¹² *Rising golf star Will Zalatoris drops \$10m LIV truth bomb as Bryson floats bold golf 'Super Bowl' idea*, Fox Sports, Sep. 17, 2022, available at: <https://www.foxsports.com.au/golf/liv-golf->

115. It is clear what Chamblee is doing. He has shown himself to be a disciple of the “Skip Bayless” school of sports analysis—the fundamental tenet of which is that it is more important to be loud than it is to be correct and truthful. Chamblee has followed this false “playbook” religiously, down to fabricating a feud with an athlete at the top of their game—in Bayless’ case, LeBron James, and in Chamblee’s case, first Tiger Woods, and then Mr. Reed—in order to leech attention, notoriety, and fame from those who were able to achieve far more than he ever did as a golfer, which is probably the driving force behind his bitter personal animus and bias leveled against Mr. Reed.

116. Chamblee’s exploitative *modus operandi* was shown as early as in 2013, when he also outrageously accused Tiger Woods of cheating, without any basis in fact to do so.¹³ In a scathing article in the Bleacher Report, Chamblee was eviscerated for his ego-driven, attention hungry conduct by Woods’ agent:

“With virtually no evidence except for what may be in his mind, Chamblee deserves his own “F” for calling Tiger a cheater.”

“In an effort to raise his own profile, Chamblee has become strident and attacking, eschewing the basic principles of journalism. While singling out Tiger with his unfounded criticism and innuendo, Chamblee sounds like he is auditioning for an anchor position on Fox News.”

“In a sophomoric display of ego, [Chamblee] compared Tiger’s fallibility to his own cheating experience while a fourth grader.”

“Tiger’s penalties came under a lot of scrutiny. But scrutiny is not the same as character assassination, and since he is Tiger Woods and not Joe Woods, he gets called the worst possible name you can call a golfer. Golf is a gentleman’s sport,

2022-chicago-invitational-scoreboard-results-prize-money-will-zalatoris-bryson-dechambeau/news-story/f74760ef86a1bc42673e26a93ec43cef

¹³ Richard Leivenberg, *Is Brandel Chamblee Labeling Tiger Woods a Cheater Fair or Foul?*, Bleacher Report, Oct. 19, 2013, available at: <https://bleacherreport.com/articles/1817394-is-brandel-chamblee-labeling-tiger-woods-a-cheater-fair-or-foul>

and Chamblee—with his biased approach to Tiger—has shown he is no gentleman.”

117. Chamblee’s outrageous statements even precipitated threat of legal action from Mr. Woods’ camp:

There's nothing you can call a golfer worse than a cheater," Steinberg said. "This is the most deplorable thing I have seen. I'm not one for hyperbole, but this is absolutely disgusting. Calling him a cheater? I'll be shocked, stunned if something is not done about this. Something has to be done.

"There are certainly things that just don't go without response. It's atrocious. I'm not sure if there isn't legal action to be taken. I have to give some thought to legal action."¹⁴

118. On information and belief, based on all of the direct and circumstantial evidence, during early to September 2022, these co-conspirator and joint tortfeasor Defendants, in conjunction with the PGA Tour and DP World Tour and their leadership, including but not limited to Jay Monahan and Keith Pelley, have enlisted and directed PGA Tour pros such as David Love III, Rory McIlroy, Fred Couples, Billy Horschel, Joel Dahmen, Justin Thomas and a host of others as their agents and surrogates, and elsewhere, to smear and defame Mr. Reed and the other LIV golfers on Golf Channel, falsely claiming that the recent lawsuit that LIV brought against the PGA Tour, which is a non-profit 510(c)(6) corporation, is a personal lawsuit against all PGA Tour players individually. In truth, the LIV antitrust suit was simply crafted to ensure free competition between the PGA Tour and LIV and was not against the PGA Tour players themselves. This is simply false, as not one PGA Tour pro has been sued, and Mr. Reed wishes none of them any ill will, but instead wishes them well, and considers them his friends and colleagues. This is a cynical dishonest and deceitful effort to pit golfer against golfer, defame

¹⁴ Matt Yoder, *Tiger Woods camp threatens lawsuit against Golf Channel's Brandel Chamblee*, Awful Announcing, Oct. 22, 2013, available at: <http://amp.awfulannouncing.com/2013/tiger-woods-camp-threatens-lawsuit-against-golf-channel-s-brandel-chamblee.html>

Mr. Reed and other LIV players and to harm their reputations, good will, livelihood and well-being with the golfing public and elsewhere in the public domain, as well as to incite violence against them and their families. This paragraph will be supplemented as more evidence comes to light and is also gathered in discovery.

119. The bottom line is that Defendants, each and every one of them, acting in concert as co-conspirators and joint tortfeasors as set forth above, have on numerous occasions crossed the line of what is legitimate and acceptable criticism and analysis of Mr. Reed' golfing ability and instead made numerous false, malicious, and defamatory widely published and damaging statements of and concerning Mr. Reed that are not intended to be golf analysis, but instead are targeted vicious attacks on Mr. Reed's character and reputation related to his trade and profession and personally, causing huge financial and emotional damage to him, his business relationships, his businesses, colleagues and his family. This malicious defamatory conduct must be compelled to stop, and Defendants, each and every one of them as co-conspirators and joint tortfeasors, must be held to account for the irreparable harm and damage that has already been done to Mr. Reed, his business relationships, his businesses, his colleagues and his family.

120. Pursuant to Fla. Stat. § 770.01, the undersigned counsel has demanded correction or retraction from the Defendants at least five (5) days to the filing of this Complaint, and Defendants have arrogantly refused to do so, further ratifying and condoning the defamatory statements set forth herein. Defendants believe and act as if they are above the law and that there is no consequence for their actions and have enlisted and continue to enlist third parties to belittle and defame Mr. Reed for asserting his legal rights, as well as his wife and family, for their own financial gain and other nefarious purposes.

VI. CAUSES OF ACTION

FIRST CAUSE OF ACTION

Defamation

Defendant Chamblee

121. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

122. Defendant Chamblee, acting together with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

123. These statements, made on Horace Langley's podcast, Golf Channel, Sky Sports News and Twitter, include but are not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are 'growing the game'... it makes me want to puke. They're destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

Golf won today. Murderers lost.

...either way, whether the money is against or in addition to guarantees its still blood money and you're still complicit in sportswashing.

[t]hese thugs are directed by the people who fund LIV golf...but LIV will pretend this video and so many others depicting human rights atrocities don't exist, but will happily post video of a golf event in Boston meant to sportswash these atrocities.

[b]y defectors I mean those who have turned their backs on the meritocracy of professional golf. I mean those who have sold their independence to a murderous dictator and those who have sued their fellow professionals so they can benefit from the tours they are trying to ruin.

No. Wrong. But when they murdered, butchered and dismembered a dissenting journalists [sic] they began to care. Those same people behind that murder run this tour.

[t]he IOC decides where the Olympics go...and there is a big difference between doing business in a country and directly for a murderous regime as LIV golfers are.

I can understand [Mohammed bin Salman Al Saud's] regime wanting to become more than a petro[il] country & corporate interest to serve that part of the world. I can't understand an individual working for him.

LIV golf is about hiding [the Saudi Arabia regime's] human atrocities.

[t]he criticism of LIV defectors is not that they are doing it for the money, that is easily understood, what is not so easily understood is why they would directly work for a regime that has such a reprehensible record on human rights.

[t]he sportwashing paid to turn a blind eye to atrocities, the blight of LIV.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.

Mr. Reed was “bought” by LIV.

124. Defendant Chamblee's defamatory publications are not privileged in any way or manner.

125. The false, defamatory and misleading publications of and concerning Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

126. Defendant Chamblee knew or had reason to know that the publications were false and misleading.

127. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

SECOND CAUSE OF ACTION

***Defamation by Implication
Defendant Chamblee***

128. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

129. Defendant Chamblee, acting together with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

130. These statements, made on Horace Langley's podcast, Golf Channel, Sky Sports News and Twitter, include, but are not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are 'growing the game'... it makes me want to puke. They're destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

Golf won today. Murderers lost.

...either way, whether the money is against or in addition to guarantees its still blood money and you're still complicit in sportswashing.

[t]hese thugs are directed by the people who fund LIV golf...but LIV will pretend this video and so many others depicting human rights atrocities don't exist, but will happily post video of a golf event in Boston meant to sportswash these atrocities.

[b]y defectors I mean those who have turned their backs on the meritocracy of professional golf. I mean those who have sold their independence to a murderous dictator and those who have sued their fellow professionals so they can benefit from the tours they are trying to ruin.

No. Wrong. But when they murdered, butchered and dismembered a dissenting journalists [sic] they began to care. Those same people behind that murder run this tour.

[t]he IOC decides where the Olympics go...and there is a big difference between doing business in a country and directly for a murderous regime as LIV golfers are.

I can understand [Mohammed bin Salman Al Saud's] regime wanting to become more than a petro[l] country & corporate interest to serve that part of the world. I can't understand an individual working for him.

LIV golf is about hiding [the Saudi Arabia regime's] human atrocities.

[t]he criticism of LIV defectors is not that they are doing it for the money, that is easily understood, what is not so easily understood is why they would directly work for a regime that has such a reprehensible record on human rights.

[t]he sportswashing paid to turn a blind eye to atrocities, the blight of LIV.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.

Mr. Reed was “bought” by LIV.

131. Defendant Chamblee’s defamatory publications of and concerning Mr. Reed are not privileged in any way or manner.

132. Defendant Chamblee, acting together with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, published false statements of and concerning Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

133. Defendant Chamblee, acting together with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

134. A reasonable person would understand Defendant Chamblee’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

135. Defendant Chamblee, acting together with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created, and these false, defamatory and misleading statements were made with actual malice.

136. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally,

THIRD CAUSE OF ACTION
Defamation Per Se
Defendant Chamblee

137. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

138. Defendant Chamblee, acting together with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

139. These statements, made on Horace Langley's podcast, Golf Channel, Sky Sports News and Twitter, include, but are not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they

are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are ‘growing the game’... it makes me want to puke. They’re destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

Golf won today. Murderers lost.

...either way, whether the money is against or in addition to guarantees its still blood money and you’re still complicit in sportswashing.

[t]hese thugs are directed by the people who fund LIV golf...but LIV will pretend this video and so many others depicting human rights atrocities don’t exist, but will happily post video of a golf event in Boston meant to sportswash these atrocities.

[b]y defectors I mean those who have turned their backs on the meritocracy of professional golf. I mean those who have sold their independence to a murderous dictator and those who have sued their fellow professionals so they can benefit from the tours they are trying to ruin.

No. Wrong. But when they murdered, butchered and dismembered a dissenting journalists [sic] they began to care. Those same people behind that murder run this tour.

[t]he IOC decides where the Olympics go...and there is a big difference between doing business in a country and directly for a murderous regime as LIV golfers are.

I can understand [Mohammed bin Salman Al Saud’s] regime wanting to become more than a petro[l] country & corporate interest to serve that part of the world. I can’t understand an individual working for him.

LIV golf is about hiding [the Saudi Arabia regime's] human atrocities.

[t]he criticism of LIV defectors is not that they are doing it for the money, that is easily understood, what is not so easily understood is why they would directly work for a regime that has such a reprehensible record on human rights.

[t]he sportwashing paid to turn a blind eye to atrocities, the blight of LIV.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.

Mr. Reed was “bought” by LIV.

140. Defendant Chamblee's defamatory publications are not privileged in any way or manner.

141. The false, defamatory and misleading nature of Defendant Chamblee's publications of and concerning Plaintiff caused Mr. Reed ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

142. The false, defamatory and misleading publications were made with actual malice.

143. Defendant Chamblee knew or had reason to know that the publications were false and misleading.

144. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer and businessman and personally.

FOURTH CAUSE OF ACTION

***Civil Conspiracy
Defendant Chamblee***

145. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

146. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

147. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

148. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

149. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

FIFTH CAUSE OF ACTION

Defamation

Defendant Golf Channel

150. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

151. Defendant Golf Channel, acting together with its co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

152. These statements made by Chamblee, Bacon, and Hack include, but are not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are 'growing the game'... it makes me want to puke. They're destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing -- at the time it was called the South African tour under apartheid -- tournaments played there to accumulate world ranking points.

Mr. Reed was "bought" by LIV.

153. Defendant Golf Channel's defamatory publications of and concerning Mr. Reed are not privileged in any way or manner.

154. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

155. Defendant Golf Channel knew or had reason to know that the publications were false and misleading.

156. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

SIXTH CAUSE OF ACTION

***Defamation by Implication
Defendant Golf Channel***

157. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

158. Defendant Golf Channel, acting together with its co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

159. These statements made by Chamblee, Bacon, and Hack include, but are not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are 'growing the game'... it makes me want to puke. They're destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.

Mr. Reed was “bought” by LIV.

160. Defendant Golf Channel’s defamatory publications are not privileged in any way or manner.

161. Defendant Golf Channel, acting together with its co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, published false statements of and concerning Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

162. Defendant Golf Channel, acting together with its co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

163. A reasonable person would understand Defendant Golf Channel’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

164. Defendant Golf Channel, acting together with its co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

165. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

SEVENTH CAUSE OF ACTION

Defamation Per Se
Defendant Golf Channel

166. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

167. Defendant Golf Channel, acting together with its co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

168. These statements made by Chamblee, Bacon, and Hack include, but are not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are 'growing the game'... it makes me want to puke. They're destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.

Mr. Reed was “bought” by LIV.

169. Defendant Golf Channel’s defamatory publications are not privileged in any way or manner.

170. The false, defamatory and misleading nature of Defendant Golf Channel’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer

171. The false, defamatory and misleading publications were made with actual malice.

172. Defendant Golf Channel knew or had reason to know that the publications were false and misleading.

173. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

EIGHTH CAUSE OF ACTION
Civil Conspiracy
Defendant Golf Channel

174. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

175. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

176. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

177. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

178. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

NINTH CAUSE OF ACTION

***Defamation
Defendant Hack***

179. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

180. Defendant Hack, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

181. These statements made on Golf Channel include, but are not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

182. Defendant Hack's defamatory publications are not privileged in any way or manner.

183. To establish general defamation, a plaintiff need only show that a person or entity (1) published a false statement; (2) about another person; (3) to a third party; and (4) the falsity of the statement caused injury to the other person.

184. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

185. Defendant Hack knew or had reason to know that the publications were false and misleading.

186. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TENTH CAUSE OF ACTION
Defamation by Implication
Defendant Hack

187. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

188. Defendant Hack, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

189. These statements made on Golf Channel include, but are not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at

this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

190. Defendant Hack's defamatory publications are not privileged in any way or manner.

191. Defendant Hack, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

192. Defendant Hack, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

193. A reasonable person would understand Defendant Hack's statements to impart the false innuendo, which would be highly offensive to a reasonable person.

194. Defendant Hack, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

195. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

ELEVENTH CAUSE OF ACTION

Defamation Per Se
Defendant Hack

196. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

197. Defendant Hack, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

198. These statements made on Golf Channel include, but are not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

199. Defendant Hack's defamatory publications are not privileged in any way or manner.

200. The false, defamatory and misleading nature of Defendant Hack's publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

201. The false, defamatory and misleading publications were made with actual malice.

202. Defendant Hack knew or had reason to know that the publications were false and misleading.

203. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWELFTH CAUSE OF ACTION

Civil Conspiracy
Defendant Hack

204. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

205. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and

other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

206. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

207. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

208. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

THIRTEENTH CAUSE OF ACTION

***Defamation
Defendant Bacon***

209. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

210. Defendant Bacon, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or

negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

211. These statements made on Golf Channel include, but are not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

212. Defendant Bacon's defamatory publications are not privileged in any way or manner.

213. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

214. Defendant Bacon knew or had reason to know that the publications were false and misleading.

215. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

FOURTEENTH CAUSE OF ACTION
Defamation by Implication
Defendant Bacon

216. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

217. Defendant Bacon, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

218. These statements made on Golf Channel include, but are not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we

have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

219. Defendant Bacon's defamatory publications are not privileged in any way or manner.

220. Defendant Bacon, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

221. Defendant Bacon, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

222. A reasonable person would understand Defendant Bacon's statements to impart the false innuendo, which would be highly offensive to a reasonable person.

223. Defendant Bacon, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

224. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

FIFTEENTH CAUSE OF ACTION
Defamation Per Se

Defendant Bacon

225. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

226. Defendant Bacon, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

227. These statements made on Golf Channel include, but are not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

228. Defendant Bacon's defamatory publications are not privileged in any way or manner.

229. The false, defamatory and misleading nature of Defendant Bacon's publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

230. The false, defamatory and misleading publications were made with actual malice.

231. Defendant Bacon knew or had reason to know that the publications were false and misleading.

232. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

SIXTEENTH CAUSE OF ACTION

Civil Conspiracy
Defendant Bacon

233. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

234. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

235. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

236. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

237. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

SEVENTEENTH CAUSE OF ACTION

***Defamation
Defendant Lynch***

238. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

239. Defendant Lynch, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

240. These statements made on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

241. Defendant Lynch 's defamatory publications are not privileged in any way or manner.

242. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

243. Defendant Lynch knew or had reason to know that the publications were false and misleading.

244. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

EIGHTEENTH CAUSE OF ACTION
Defamation by Implication
Defendant Lynch

245. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

246. Defendant Lynch, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

247. These statements made on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

248. Defendant Lynch’s defamatory publications are not privileged in any way or manner.

249. Defendant Lynch, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

250. Defendant Lynch, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

251. A reasonable person would understand Defendant Lynch’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

252. Defendant Lynch, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

253. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

NINETEENTH CAUSE OF ACTION

***Defamation Per Se
Defendant Lynch***

254. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

255. Defendant Lynch, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

256. These statements made on Golfweek, which is owned by Gannett , include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

257. Defendant Lynch’s defamatory publications are not privileged in any way or manner.

258. The false, defamatory and misleading nature of Defendant Lynch’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

259. The false, defamatory and misleading publications were made with actual malice.

260. Defendant Lynch knew or had reason to know that the publications were false and misleading.

261. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWENTIETH CAUSE OF ACTION

Civil Conspiracy

Defendant Lynch

262. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

263. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

264. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

265. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

266. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

TWENTY-FIRSTS CAUSE OF ACTION

Defamation
Defendant Golfweek

267. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

268. Defendant Golfweek, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

269. These statements made by Lynch on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

270. Defendant Golfweek’s defamatory publications are not privileged in any way or manner.

271. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

272. Defendant Golfweek knew or had reason to know that the publications were false and misleading.

273. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWENTY-SECOND CAUSE OF ACTION
Defamation by Implication
Defendant Golfweek

274. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

275. Defendant Golfweek, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

276. These statements made by Lynch on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

277. Defendant Golfweek’s defamatory publications are not privileged in any way or manner.

278. Defendant Golfweek, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually,

published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

279. Defendant Golfweek, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

280. A reasonable person would understand Defendant Golfweek's statements to impart the false innuendo, which would be highly offensive to a reasonable person.

281. Defendant Golfweek, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

282. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWENTY-THIRD CAUSE OF ACTION

***Defamation Per Se
Defendant Golfweek***

283. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

284. Defendant Golfweek, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or

negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

285. These statements made by Lynch on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

286. Defendant Golfweek’s defamatory publications are not privileged in any way or manner.

287. The false, defamatory and misleading nature of Defendant Golfweek’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

288. The false, defamatory and misleading publications were made with actual malice.

289. Defendant Golfweek knew or had reason to know that the publications were false and misleading.

290. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWENTY-FOURTH CAUSE OF ACTION
Civil Conspiracy
Defendant Golfweek

291. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

292. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

293. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

294. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

295. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

TWENTY-FIFTH CAUSE OF ACTION

***Defamation
Defendant Gannett***

296. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

297. Defendant Gannett, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

298. These statements made by Lynch on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

299. Defendant Gannett’s defamatory publications are not privileged in any way or manner.

300. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

301. Defendant Gannett knew or had reason to know that the publications were false and misleading.

302. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWENTY-SIXTH CAUSE OF ACTION

Defamation by Implication

Defendant Gannett

303. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

304. Defendant Gannett, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning the Plaintiff which they knew or should have known to be false and misleading.

305. These statements made by Lynch on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

306. Defendant Gannett’s defamatory publications are not privileged in any way or manner.

307. Defendant Gannett, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

308. Defendant Gannett, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the

alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

309. A reasonable person would understand Defendant Gannett's statements to impart the false innuendo, which would be highly offensive to a reasonable person.

310. Defendant Gannett, acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

311. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWENTY- SEVENTH CAUSE OF ACTION

***Defamation Per Se
Defendant Gannett***

312. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

313. Defendant Gannett acting together in concert as joint tortfeasors with his co-Defendants, acting in concert as joint tortfeasors, jointly and severally, and individually, have defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements of and concerning Mr. Reed which they knew or should have known to be false and misleading.

314. These statements made by Lynch on Golfweek, which is owned by Gannett, include but are not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the "evil empire's...Death Star,"

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

315. Defendant Gannett’s defamatory publications are not privileged in any way or manner.

316. The false, defamatory and misleading nature of Defendant Gannett’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

317. The false, defamatory and misleading publications were made with actual malice.

318. Defendant Gannett knew or had reason to know that the publications were false and misleading.

319. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, as a businessman, and personally.

TWENTY-EIGHTH CAUSE OF ACTION

***Civil Conspiracy
Defendant Gannett***

320. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

321. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed’s goods and services.

322. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

323. Defendants acting together in concert as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

324. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

TWENTY-NINTH CAUSE OF ACTION

Injurious Falsehoods
Defendant Chamblee

325. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

326. Defendant Chamblee has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are 'growing the game'... it makes me want to puke. They're destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

Golf won today. Murderers lost.

...either way, whether the money is against or in addition to guarantees its still blood money and you're still complicit in sportswashing.

[t]hese thugs are directed by the people who fund LIV golf...but LIV will pretend this video and so many others depicting human rights atrocities don't exist, but will happily post video of a golf event in Boston meant to sportswash these atrocities.

[b]y defectors I mean those who have turned their backs on the meritocracy of professional golf. I mean those who have sold their independence to a murderous dictator and those who have sued their fellow professionals so they can benefit from the tours they are trying to ruin.

No. Wrong. But when they murdered, butchered and dismembered a dissenting journalists [sic] they began to care. Those same people behind that murder run this tour.

[t]he IOC decides where the Olympics go...and there is a big difference between doing business in a country and directly for a murderous regime as LIV golfers are.

I can understand [Mohammed bin Salman Al Saud's] regime wanting to become more than a petro[l] country & corporate interest to serve that part of the world. I can't understand an individual working for him.

LIV golf is about hiding [the Saudi Arabia regime's] human atrocities.

[t]he criticism of LIV defectors is not that they are doing it for the money, that is easily understood, what is not so easily understood is why they would directly work for a regime that has such a reprehensible record on human rights.

[t]he sportwashing paid to turn a blind eye to atrocities, the blight of LIV.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.

Mr. Reed was “bought” by LIV

327. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

328. Defendant Chamblee knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

329. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

THIRTIETH CAUSE OF ACTION
Injurious Falsehoods
Defendant TGC

330. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

331. Defendant Golf Channel has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

So if they're aligning themselves with a tyrannical, murderous leader... look if you if you look at who MBS is... centralizing power, committing all these atrocities, you look at what he's doing to the citizens of his... of his country ask yourself I mean would you have played for Stalin would you have played for Hitler would you have played for Mao would you play for Pol Pot," [Froggy] "would you have played for Putin?" [Chamblee in agreement] "would you have played for Putin... which... and this who this guy is. He settles disputes with bonesaws.

I think there's a reason for that...they're destroying the professional game they were they been put in the Hall of Fame because of their accomplishments and because of their legacy well they've tainted their legacy in an irreparable way so I think both of them should be kicked out of the Hall of Fame I really do...

Mr. Reed is "over there purely playing for blood money."

[n]ow he has continued his subterfuge by saying the PGA Tour could end any threat, presumably from the Saudi blood money funding a proposed Super Golf League, by just handing back the media rights to the players

Mr. Reed's money is "coming from the wrong place" and that its "good [PGA Tour] versus evil [Mr. Reed and LIV] ...evil usually fails. So, it will fail."

[t]his is one of the saddest days in the history of golf. Watching these players come together for money and show to the world...they are showing us that they

are the greediest, most self-serving, self-interested, willfully blind players in the world of golf today.

[s]o when I hear these players say that they are 'growing the game'... it makes me want to puke. They're destroying the game. And they are destroying their reputations.

I either messaged or talked to 15 to 20 current and past tour players, some of them Hall of Fame members, over the past 24 hours and not a single player is in defense of what Patrick Reed did.

violated that [unwritten] code in so many ways that even the rules officials themselves were sort of stammering as to how to address it.

Ask yourself this: if everybody in the field were to conduct themselves around a golf ball in this manner, would it be good for the game of golf? It would not be. It would call into question every single movement or drop that every single player would be making. It would cause an uproar on the PGA Tour.

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

They would not like to see a tour funded by a government with such a discriminatory practice by that government. This would be at least in my view

akin to allowing – at the time it was called the South African tour under apartheid – tournaments played there to accumulate world ranking points.

Mr. Reed was “bought” by LIV

332. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

333. Defendant Golf Channel knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed’s line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

334. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

THIRTY-FIRST CAUSE OF ACTION

Injurious Falsehoods

Defendant Hack

335. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

336. Defendant Hack has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

337. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

338. Defendant Hack knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

339. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

THIRTY-SECOND CAUSE OF ACTION
Injurious Falsehoods
Defendant Bacon

340. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

341. Defendant Bacon has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

I'm just not comfortable with Patrick's behavior around the ball. You know, I always thought that the golf ball -- you treat it like the Hope Diamond. You treat it like a Fabergé egg, especially when it comes to an unclear situation. So right here we're seeing Patrick kind of hovering over where he says the ball was embedded and it's just hard to know what he's doing. Like where is the official at this point? You know, we're supposed to take him at his word, but there's -- there just seems to be smoke.

To me, this looks bad for Patrick Reed, a guy that has history of doing these things.

So now we have to lean on the fact that Patrick Reed does have a history. I go back to 2019 in the Bahamas, the Par 5, 11th hole where he, you know, has the brushing away of the sand; and then later says, "Well, it's my word against their word." And he says that "When I get in the sand" -- he says, "I'm afraid of getting close to the cup hole." That's his direct quote. "I'm afraid." "Every time I get in the bunker, I'm scared to even get my club close to it." He's close to it, Shane Bacon. He's not just close to it. He's sweeping it away. When you tell me that high-level players can tell me the difference between two clubs that weigh a .01 ounce difference. He's not feeling that? So we already have this situation. And we have the smoking mirrors about his time in Georgia where he was kicked off of the team and had to transfer to Augusta State. So he does have a history and now we have another situation.

342. These falsehoods were published widely to third parties in this judicial district, nationwide, and world wide.

343. Defendant Bacon knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

344. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships not receiving new sponsorship opportunities at the same rate prior to these

falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

THIRTY-THIRD CAUSE OF ACTION

Injurious Falsehoods

Defendant Lynch

345. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

346. Defendant Lynch has published numerous falsehoods on Golfweek, which is owned by Gannett, of and concerning Mr. Reed, including but not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

347. These falsehoods were published widely to third parties in this judicial district, nationwide, and world wide.

348. Defendant Lynch knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed’s line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

349. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

THIRTY-FOURTH CAUSE OF ACTION

Injurious Falsehoods

Defendant Golfweek

350. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

351. Defendant Golfweek has published numerous falsehoods by Lynch of and concerning Mr. Reed, including but not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

352. These falsehoods were published widely to third parties in this judicial district, nationwide, and world wide.

353. Defendant Golfweek knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed’s line of golf clubs, grindworksUSA.

354. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

THIRTY-FIFTH CAUSE OF ACTION

Injurious Falsehoods

Defendant Gannett

355. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

356. Defendant Gannet, which owns Golfweek, has published numerous falsehoods by Lynch of and concerning Mr. Reed, including but not limited to:

accusing LIV, and its golfers, prominently including Mr. Reed, as being the “evil empire’s...Death Star,”

accusing Mr. Reed and other LIV golfers of “opt[ing] to cut and run for Saudi money,”

admitting that Mr. Reed and other LIV golfers had endured “reputational harm that comes with taking guaranteed cash to sportswash Saudi atrocities.”

357. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

358. Defendant Lynch knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed’s line of golf clubs, grindworksUSA.

359. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

THIRTY-SIXTH CAUSE OF ACTION

Tortious Interference

Defendant Chamblee

360. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

361. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

362. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

363. Defendants knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

364. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

365. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

THIRTY-SEVENTH CAUSE OF ACTION

Tortious Interference
Defendant Golf Channel

366. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

367. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

368. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

369. Defendants knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

370. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

371. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

THIRTY-EIGHTH CAUSE OF ACTION

Tortious Interference

Defendant Hack

372. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

373. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

374. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

375. Defendants knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

376. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

377. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

THIRTY-NINTH CAUSE OF ACTION

Tortious Interference

Defendant Bacon

378. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

379. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

380. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

381. Defendants knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

382. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

383. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

FOURTIETH CAUSE OF ACTION

Tortious Interference

Defendant Lynch

384. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

385. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

386. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

387. Defendants knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

388. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

389. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

FOURTY-FIRST CAUSE OF ACTION

Tortious Interference

Defendant Golfweek

390. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

391. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

392. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

393. Defendants knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

394. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

395. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

FOURTY-SECOND CAUSE OF ACTION

Tortious Interference

Defendant Gannett

396. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

397. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

398. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

399. Defendants knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

400. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

401. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief and judgment against each Defendant, jointly and severally, as joint tortfeasors as follows:

(a) For general (non-economic), special (economic), actual and compensatory damages in an amount to be determined by the jury in an amount in excess of \$750,000,000.00 U.S. dollars, as well as injunctive relief;

(b) For consequential damages in a sum reasonable to a jury;

(c) For punitive damages in an amount to be determined by the jury to punish and impress upon Defendants the seriousness of their conduct and to deter similar conduct in the future;

(d) For attorneys' fees, expenses and costs of this action, and;

(e) For such further relief as this Court deems necessary, just and proper.

DEMAND FOR TRIAL BY JURY

Plaintiff Patrick Nathaniel Reed demands a trial by jury on all counts as to all issues so triable.

Dated: September 28, 2022

Respectfully submitted,

/s/ Larry Klayman, Esq.
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