

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT,  
IN AND FOR LAKE COUNTY, FLORIDA**

BOWEN KOU, a Republican candidate,  
Plaintiff,

vs.

CASE NO:

FLORIDA REPUBLICAN SENATORIAL  
CAMPAIGN COMMITTEE, INC., and  
BEN ALBRITTON, in his capacity as  
Chairman of the Florida Republican  
Senatorial Campaign Committee,  
Defendants.

**COMPLAINT FOR DEFAMATION**

Plaintiff BOWEN KOU sues defendants FLORIDA REPUBLICAN SENATORIAL  
CAMPAIGN COMMITTEE, INC. ("FRSCC") and BEN ALBRITTON, in his capacity as  
Chairman of FRSCC and states:

**JURISDICTION AND VENUE**

1. This is an action for damages that exceed \$50,000.
2. Venue is proper in Lake County under Fla. Stat. § 47.011 because it is where the cause of action accrued.

**PARTIES**

3. Plaintiff Bowen Kou is a conservative American businessman and a Republican candidate for the Florida Senate, District 13.
4. Defendant FRSCC is a dark money political committee financed by special interests in Tallahassee, Florida that specializes in false and defamatory "attack ads" against conservative Republicans in primary elections. Defendant BEN ALBRITTON is the Chairman of FRSCC.

## LIBEL

5. On or about June 26, 2024, Defendant FRSCC published and sent a false and defamatory mass political mail letter to tens of thousands of Republican voters in Lake County, communicating that Plaintiff Bowen Kou is controlled by the Chinese Communist Party (“CCP”) and takes money from China. See **Exhibit A**.
6. The mailer is false and defames Plaintiff by misleading voters into believing that Mr. Kou has received political donations from China. Plaintiff Bowen Kou has never received political donations from China, Chinese citizens, or members of the Chinese Communist Party.
7. The mailer falsely states that the American Republicans of Chinese descent who have donated to Mr. Kou are living in China and are members of the Chinese Communist Party. The mailer does so by displaying a large arrow pointing to the nation of China on a map with an overlaying flag of China, a nation ruled solely by the Chinese Communist Party. The arrow is connected to and points from the following false words: “80% of Kou’s donations are from outside of Florida”
8. That statement is false and made with actual malice for two reasons: First, because Mr. Kou has never taken money from China or Members of the Chinese Communist Party; Second, because over 90% of Mr. Kou’s donations have come from himself. Since he lives in Florida, over 90% of his donations have therefore come from his home state of Florida. Defendant FRSCC knows this and deliberately stated otherwise with malice.
9. Defendant FRSCC made the defamatory statement with the requisite intent of malice, which is known because Defendant FRSCC has previously endorsed Mr. Kou’s

primary election opponent, Keith Truenow, and it has stated that it is working to defeat Mr. Kou in the election. Further malice is shown by the deliberately false images attempting to depict Mr. Kou as a non-citizen. Lastly, Defendant FRSCC deliberately attached a headline from the publication *Politico* stating, "The Absolute Explosion of Foreign Interference In US Politics," although the article has nothing to do with Mr. Kou or his race. It was included to falsely imply that Mr. Kou is taking foreign money.

10. Plaintiff has suffered damages. The statements made by Defendant are false, and degrade and injure plaintiff in his good name and reputation and expose him to distrust, hatred, contempt and obloquy in the community.

11. As a result of these false and defamatory published statements, Plaintiff was and is injured in his good name and reputation and brought into public scandal, and his political campaign and his personal businesses have been significantly harmed due to the false and defamatory attack ads. Voters are telling Mr. Kou that they believe this false and defamatory mailer is true, despite its falsity. Lastly, Plaintiffs close friends and associates feel threatened by the mailer, which accuses of them of being foreign assets, and are likely to be the target of harm.

**WHEREFORE** Plaintiff demands judgment against Defendants for damages of \$1,000,000 and a trial by jury.

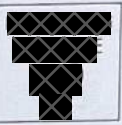
**DATED:** June 28, 2024.

Respectfully submitted,

*/s/ Anthony F. Sabatini*  
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*Why are*  
**CHINESE  
DONORS**

(from all over the country)

**FLOODING BOWEN KOU**

(Lake County State Senate Race)

**WITH CASH?**

**“THE ‘ABSOLUTE EXPLOSION’ OF  
FOREIGN INTERFERENCE IN U.S. POLITICS”**

POLITICO Nightly, 6/17/2024

