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

ROME	IN 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

ANTHONY F. SABATINI, ESQ.

FL BAR No. 1018163

SABATINI LAW FIRM, P.A.

411 N DONNELLY ST, STE #313

MOUNT DORA, FL 32757

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T: (352)-455-2928 anthony@sabatinilegal.com Attorney for Plaintiff P.O. Box 471 Tallahassee, FL 32302





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Why are CHILSE 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

Date	Anount	Contributor Name	City State Zip	Date	Anount	Contributor Name	City State Zip
03/24/2023		A ONE-STANDARD REMODELING INC.	HOFFMAN ESTATES, IL 68169	00/10/2023		ENREGTT JOANNE FRESH WORLD MARKET IN, LLC	NOBLESVILLE, IN 46862 WEST LAFAYETTE, IN 47986
12/11/2023		ADAM'EE STEVEN BRESNAHAN-HANNER MARY	CHICAGO, IL 68642 HIGHLAND PARK, IL 68835	01/30/2024 04/28/2023	1,000.00	GAD YG	FORT WAYNE. IN 46885
1/10/2024	500.00	CALL CHRISTOPHER CES NATIONATOR	CHICAGO, IL 68625 HODGKINS, IL 68525	04/01/2023 03/24/2023		GUD LIN LIU JUN	CARMEL, IN 46032 ZIONSVILLE, IN 46077
6/29/2023 4/26/2023	1,000.00	CHINESE FRESH CHICKEN	CHICAGO, IL 60616 CHICAGO, IL 60616	83/28/2024	1,000.00	RCH PROPERTIES, LLC	LAFAVETTE, IN 47902
3/29/2023 13/24/2023	1,000.00	CHONG ZHAGJIA	CHICAGO, IL 68616 CHICAGO, IL 68616	03/26/2023 04/01/2023		WU QINGHUI YANG REN	CARMEL, IN 46832 CARMEL, IN 46832
3/29/2023	1,000.00	COLE JIE	CHICAGO, IL 68616	-	-		
3/15/2023 1/02/2023	1,000.00	DM AUTO SHARE FEIDA BAKERY	MORRIS, IL 60450 CHICAGO, IL 60608	Totals	7,100.00		
1/23/2024	1,000.00	FRESH INTERNATIONAL AUSTIN CORP.	SCHALMBURG, IL 60173				
2/22/2024 3/20/2023	1,000.00	FRESH INTERNATIONAL SCHALMBURG, LLC GATOR CHEF	SCHALMBURG, IL 60173 LISLE, IL 60532	Dete	Amount	Contributor Name	City State Zip
1/20/2023	100.00	GERLACH NELMUT	BARRINGTON, IL 60018	03/31/2023	1,000.00	CHEN CAYDEN	EDISON, NJ 08817
9/08/2023	1,000.00	GERSTNER JEFF GETECH LAW LLC	CHICAGO, IL 60601	03/13/2023 03/23/2023	1,000.00	CHEN CHAO CHEN ZUKUI	PRINCETON, NJ 88548 SOUTH BRUNSWICK TOWNSHIP.
3/16/2023	58.88	HE XT HEUNG SENG CORP.	CHICAGO, IL 60657 CHICAGO, IL 60601 CHICAGO, IL 60654 CHICAGO, IL 60699	03/16/2023	1,000.00	CHENG MICHELLE	PLAINSBORD TOWNSHIP, NJ 8
12/26/2023	1,000.00	HONGKONG MARKET CORPORATION	SCHALPEURG, IL 001/3	03/21/2023 03/31/2023	1,000.00	CHENG WILLIAM	EDISON, NJ 08817 PRINCETON, NJ 08540
3/38/2823	500.00	HU XTAOLI HUANG CHRIS	CHICAGO, IL 68647 CHICAGO, IL 68689	03/26/2023	1,000.00	LIU HONGMEI	PRINCETON, NJ 08548
3/26/2023 4/26/2023	1,000.04	JOYMAY GROUP INC	SCHALMBURG, IL 60193	03/29/2023 03/15/2023	1,000.00	LIU SAMMEI ZHANG CUIWEN	WEST WINDSOR TOWNSHIP, NJ HOLMOEL, NJ 87733
3/30/2023 3/25/2023	1,000.00	KONG TAT LAM THOMAS	CHICAGO, IL 68616 CHICAGO, IL 68616	83/15/2023	1,000.00	ZHANG LINGJIE	BERKELEY TOWNSHIP, NJ 0872
3/29/2023	1,000.00	LIANG YUESHENG	CHICAGO, IL 58646	03/27/2023	1,000.00	ZHANG YICHEN	HARRISON, NJ 87829
4/03/2023	1,000.00	LIN DEREK LIN KENGLI	CHICAGO, IL 68689 SCHAUMBURG, IL 60193	Total:	11,000.00		
6/83/2023	25.00	LIN PATRICK	CHICAGO, IL 68609 CHICAGO, IL 68609				
3/29/2023 1/23/2023	1,000.00	LIN YU LIU YANG	INVERNESS, IL 60067	Date	Amount	Contributor Name	City State Zip
2/15/2023	50.00	LU JEAN	URBANA, IL 61802	*********			
4/01/2023 3/30/2023	1,000.00		LIBERTYVILLE, IL 60848 CHICAGO, IL 60616	02/18/2024 03/19/2023		BLACKMAN FAYE CAI TINGLI	JACKSON, MI 49201 ANN ARBOR, HI 48105
3/31/2023	1,000.00	MENG YU	CHICAGO, IL 60616 CHICAGO, IL 60611	04/29/2023	500.00	CHEN ZHENGANG	EAST LANSING, MI 48823
1/30/2024 3/31/2023	1,000.00	NEW WORLD MARKET, LLC QA PRINTS	CHAMPAIGN, IL 61828 CHICAGO, IL 68688	03/27/2023 04/01/2023	1,000.00	LI TED	LIVONIA, MI 48150 SUPERIOR CHARTER TOWNSHIP,
3/27/2023	50.00	QIAN JOSEPH	PALATINE, IL 68867	01/30/2024 06/05/2023	1,000.00	NEW ORIENTAL MART, LLC NEWSONE GARY	EAST LANSING, MI 48823 LANSING, MI 48911
3/13/2023 3/31/2023		RSL DELUXE LLC SEA PERFECTION AMERICA CORPORATION	CHICAGO, IL 60605 CHICAGO, IL 60600	03/29/2023		NG SUSAN	GRAND BLANC, MI 48439
3/19/2023	100.00	SHI XIN	CHAMPAIGN, IL 51822	03/26/2024 03/13/2023	5.00	POWSER NANCY TREBESH HONG	YALE, MI 48097 DKENOS, MI 48864
14/21/2023 13/21/2023		SHIPLEY ROBERT SHIPLEY LAW GROUP, LTD.	CHICAGO, IL 60605 CHICAGO, IL 60602	03/16/2023		YU DANNA	TOWNSHIP OF NORTHVILLE, MI
3/21/2023 6/22/2023	100.00	SITU FENGXIN SITU FENGXIN	CHICAGO, IL 60616 CHICAGO, IL 60616	Total:	3,930.00		
88/89/2023	1,000.00	SUNG WET YAO	NAPERVILLE, IL 60564 NAPERVILLE, IL 60563	101011	3,130.00		
04/06/2023 03/26/2023		WANG CHINCHAD	NAPERVILLE, IL 60563	180			
3/14/2023	1,000.00	WANG LU	NAPERVILLE, IL 60563 NAPERVILLE, IL 60563	Date	Amount	Contributor Name	City State Zip
05/29/2023 03/30/2023		WONG JAMES WONG SHARON	PLAINFIELD, IL 60585 CHICAGO, IL 60616	03/31/2023	1,000.00	CAT VT	KATY, TX 77458
03/13/2023	1,000.00	XU TIANCHAO	SCHAUMBURG, IL 60194	05/28/2023	1.000.00	CHEN JASON	PEARLAND, TX 77584
03/30/2023 04/13/2023		YU JUDI YZ TURO LLC	CHICAGO, IL 60616 CHICAGO, IL 60616	03/30/2023	1,000.00	HU YINAN LI MELODY	CHANNEL VIEW TX 77530
03/21/2023	1,000.00	ZHAO SHIRLEY	NAPERVILLE, IL 60563	84/10/2023 83/25/2024	1,000.00	LIU CHIEN HUNG	CHANNELVIEW, TX 77530 HOUSTON, TX 77836
12/10/2023 03/19/2023		ZHOU RICHARD ZHU LIJIE	CHICAGO, IL 60632 HOFFMAN ESTATE, IL 60169	11/18/2023 04/25/2023	1,000.00	PROPNEX REALTY SU ZHAOGUANG	KATY, TX 77494 KATY, TX 77493
83/13/2823	100.00	70U KE	SCHAUMBURG, IL 60173	85/27/2823	200.00	WANG JIAQIN	FULSHEAR, TX 77441 FULSHEAR, TX 77441 FULSHEAR, TX 77441 FULSHEAR, TX 77441 FLUSHEAR, TX 77441
84/27/2023	1,000.00	ZYPHER LIMO LLC ZYPHER	CHICAGO, IL 60616	03/30/2023 05/31/2023	1,000.00	WANG JIAQIN WANG JIAQIN	FULSHEAR, TX 77441 FULSHEAR, TX 77441
Total:	44,975.00			06/03/2023	200.00	WLURE, LLC	FLUSHEAR, TX 77441
Date	Amount	Contributor Mame	City State Zip	12/13/2023 03/19/2023	1.000.00	YU DINGHAI ZENITH CAPITAL LLC	ROUND ROCK, TX 78681 KATY, TX 77494
			CITY OF INDUSTRY, CA 91746	05/27/2023	1,000.00	ZHU HENRY	CONROE, TX 77384
06/25/2023 03/25/2023	1,000.00	1ST HOME CONSTRUCTION CORP. CAO YANGLONG	HAYWARD, CA 94545	Total:	9,988.88		
04/28/2023 04/28/2023	1,000.00	CHANG CHING I CHEN LI MIN	VERNON, CA 90058 ROWLAND HEIGHTS, CA 91748				
13/20/2023	1,000.00	CHEN LUPIN	SAN DIEGO, CA 92130	Date	Amount	Contributor Name	City State Zip
83/18/2823 83/24/2823		EXCELSION EXPRESS INC. FAN DONG	MALNUT, CA 91789 BALDWIN PARK, CA 91786			EISENRAEMER ANNIE	FUGAY-VARINA, NC 27526
03/19/2023	260.00	GEE JASON	MILLBRAE, CA 94030	05/30/2023 03/19/2023	1,000.00	LI CHUER	WAXHAW, NC 28173
83/24/2023 86/83/2023	1,000.00	GOLDEN SPRING TRANSPORTATION INC. GUD JIN	RANCHO PALOS VERDES, CA 902 SUNNYVALE, CA 94086	05/02/2023 03/30/2023	1,000.00	LIN FEI SHAD HANYU	YOUNGSVILLE, NC 27596 HIGH POINT, NC 27265
06/03/2023	25.00	GUO JIN	SUNNYVALE, CA 94086 SUNNYVALE, CA 94086	10/11/2023	100.00	SIT ROYLE	CARY, NC 27519
06/03/2023 04/28/2023	1,000.00	GUO JIN HCEL TRADING, LLC	SOUTH PASADENA, CA 91030	12/11/2023 03/19/2023		SONG DANGI YANG XIULIN	CARY, NC 27513 WAXHAW, NC 28173
03/21/2023	1,000.00	HU DI	IRVINE, CA 92618 LOS ANGELES, CA 98858	12/10/2023	25.00	ZHOU FENGSHUAN	CARY, NC 27519
83/26/2023 83/16/2023	1,000.00	INGRAM LIU JIA KEZHENG	SAN JOSE, CA 95127	Total:	4,475.00		
03/28/2023	1,000.00	KUIYI INTERNATIONAL INC.	SAN JOSE, CA 95127 ONTARIO, CA 91761 DIAMOND BAR, CA 91765	10001	1, 1, 31.00		
86/86/2823 83/28/2823	500.00	LEE EDWARD LIEN CHRISTOPHER	FOUNTAIN VALLEY, CA 92788				
83/16/2023	1,000.00	LONGWAY INC.	HALMUT, CA 91789	Date	Amount	Contributor Name	City State Zip
83/15/2823 83/15/2823	1,000.00	MENG XIANNEI	IRVINE, CA 92618	03/25/2023	1,000.00	APOLLO FOOD INTERNATIONAL INC.	COLLAGE POINT, NY 11356
83/15/2023 83/28/2023	288 88	ONELINK SOLUTIONS, INC. PENG LIYU	SAN FRÂNCISCO, CA 94108 CHINO HILLS, CA 91769	03/25/2023	1.000.00	CHEN HAIPING	EAST MEADOW, NY 11554
83/16/2823	100.00	QIAD FENG	SAN JOSE, CA 95148	83/25/2823 83/24/2823	200.00	CHEN ZHUOWEN CHEUNG ELINNA	BROOKLYN, NY 11231 BROOKLYN, NY 11286
12/04/2023	1.000.00	TOM J. ROGERS TSENG ELISMA J	SAN DIEGO, CA 92101 MORENO VALLEY, CA 92557	03/30/2023	1,000.00	GUAN XIN	FLUSHING, NY 11354
83/16/2823	1.000.00	UPBLOCK LLC	SANTA CLARA, CA 95854	03/30/2023 03/25/2023	1,000.00	GX HVAC LAKETIAN, INC.	FLUSHING, NY 11354 FARMINGDALE, NY 11735
85/31/2023 83/13/2023	1,666,66	VIN SANH TRADING CORP. WANG LI	CITY OF INDUSTRY, CA 91746 IRVINE, CA 92618	84/30/2023	1,000.00	LIN JACKY	MELVILLE, NY 11747
3/13/2023	986.88	WANG LI	IRVINE, CA 92618	03/18/2023 03/31/2023	1,000.00	LIN RICHARD LIU CHUANG	GLEN COVE, NY 11542 FLUSHING, NY 11355
83/27/2023 86/25/2023	1,000.00	MU CHUKIONG XPRO CONSTRUCTION, INC.	LOS ANGELES, CA 90005 POMONA, CA 91768	03/27/2023	1,000.00	LIU NINA LU CHUN	MASPETH, NY 11378
86/25/2023	1,000.00	XYZ SECURITY CORP.	CITY OF INDUSTRY, CA 91746	06/03/2023 03/31/2024	500.00	MA SHENGJUN	MASPETH, NY 11378 FLUSHING, NY 11354
83/31/2023 89/21/2023	25.00		OAKLAND, CA 94611 IRVINE, CA 92612	05/31/2023	1.000.00	POON WALLY	MASPETH, NY 11378
87/28/2823 84/27/2823	1,000.00	ZHANG LEI ZHANG XIAOHONG	ROSENEAD, CA 91770	84/28/2823 83/25/2823	1,000.00	STORMING CRAB TIAN YUAN	JERICHO, NY 11753 WOODBURY, NY 11797
83/28/2823	1,666.00	ZHANG YANYAN	WEST COVINA, CA 91792 IRVINE, CA 92614	03/15/2023	566.00	TRUBESTUSA INC. WU XINFANG	COLLEGE POINT, NY 11356
03/15/2023 03/24/2023	1,000.00	ZHAD JIAN ZHOU WENDY	IRVINE, CA 92682	93/39/2023 95/31/2023	1,000,00	XU MADDONG	ALBERTSON, NY 11507 NEW YORK, NY 10018
83/24/2023	268.88	ZHU VIVIAN	SAN FRANCISCO, CA 94131 LA PUENTE, CA 91748	83/26/2023	1,000.00	ZHANG TONY ZHANG ZHIGANG	BROOKLYN, NY 11228 PORT WASHINGTON, NY 11050
84/26/2023	500.00	ZHU ZHEWEI	IRVINE, CA 92618	84/26/2023		AUTHO ANAUNIU	. On anditablion, NI 11030
Totals		1 100	And the second section of the second second	Total:	17,700.00	The second secon	
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Paid political advertisement paid for by the Florida Republican Senatorial Campaign Committee, P.O. Box 471, Tallahassee, FL 32302.
The Florida Republican Senatorial Campaign Committee endorses and urges you to vote for Keith Truenow, Tom Leek, and Ben Albritton.
Approved by Keith Truenow, Tom Leek, and Ben Albritton, Republicans, for State Senate.