

**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'S VOICE, BRENDON LESLIE,
in his capacity as CEO of Florida's Voice,
and STEVE CRIM,
Defendants.

COMPLAINT FOR DEFAMATION

Plaintiff BOWEN KOU sues FLORIDA'S VOICE, BRENDON LESLIE, in his capacity as CEO of Florida's Voice, and STEVE CRIM 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 FLORIDA'S VOICE is a "pay for play" website that specializes in political "hit pieces" disguised as news coverage and acts at the direction of its donors.
5. BRENDON LESLIE is the CEO of Florida's Voice.
6. STEVE CRIM is the president of Common Sense America, a 501c4.

LIBEL

7. On or about June 28, 2024, Defendants published and posted an article containing the false statement that Plaintiff Kou is a "Chinese National." See **Exhibit A**.

8. The article is false and defames Plaintiff by including the statement by Defendant Steve Crim calling Mr. Kou is a foreign citizen. The statement is published approvingly by Defendant Florida Voice and its Defendant CEO Brendon Leslie. Plaintiff Kou is an American and has no ties to foreign communist governments, nor has he accepted money from foreign communist governments.

9. The article also contains the following false words: “Currently, a Chinese national running for a Florida State Senate seat has raised many questions about whether he has ongoing ties with the communist nation.”¹ See **Exhibit A**. Further it states that “Bowen Kou, a state Senate candidate, potentially having connections and being funded by the foreign power...”. Id. No evidence is presented to validate these false claims.

10. These statements are false and made with actual malice. Actual malice is present because all Defendants know Mr. Bowen Kou is an American citizen and not a citizen of China. They also know or should have known that Mr. Kou has never taken money from China or Members of the Chinese Communist Party. Defendants Florida’s Voice and Brendon Leslie have coordinated this attack and work at the direction of various political interests in Florida. The goal of the political interests guiding Florida’s Voice and the false and defamatory article is to damage Plaintiff Bowen Kou in his upcoming Republican primary election. Defendants have committed defamation through direct statements and defamation by implication by juxtaposing a series of facts so as to imply a defamatory connection between them; namely, by connecting information about the Americans of Chinese ethnicity that have donated to Plaintiff Bowen Kou in order imply that he is accepting money from *foreign* citizens.

¹ Article: <https://flvoicenews.com/common-sense-america-urges-florida-to-address-chinese-influence-warns-of-infiltration-in-state-senate/>

11. All Defendants made and published the defamatory statement with the requisite intent of malice, which is known because they know that Mr. Kou is an American citizen, and no evidence exists showing that he is influenced by the foreign communist government of China.

12. 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.

13. 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 article. Voters are telling Mr. Kou that they believe this false and defamatory mailer is true, despite its falsity. Lastly, Plaintiffs close friends and business associates feel threatened by the article, which falsely accuses him and his American donors of being foreign assets, which will make Mr. Kou and his friends the target of harm.

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

DATED: June 29, 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
T: (352)-455-2928
anthony@sabatinilegal.com