

hoax” and about 15 seconds later he refers to his political opponents’ characterization of his response to the coronavirus, saying “this is their new hoax.”

26. The PUSA ad as broadcast by WJFW-NBC falsely pieced together the separate audio clips “The coronavirus” and “this is their new hoax” to create an audio clip of candidate Trump saying those words all together, as one sentence. The PUSA ad compounds this falsity by displaying text representing that these words were said together. While the PUSA ad is playing these pieced-together audio clips, in the background there is a graphic that appears to show the growth of known cases of COVID-19 in the United States between January and March 2020.

27. The PUSA ad also displays subtitles of text that match with the words in the audio clips.

28. In relevant part, the PUSA ad displays the following text: “The coronavirus,” then immediately following, displays the text: “this is their new hoax.” Screenshots of these frames of the PUSA ad are attached hereto as Exhibit A (timestamp 0:01, 0:02, 0:03).

29. The phrase “The coronavirus” begins with a capitalized “T”, the “t” in “this” is lowercase, and the word “hoax” is followed by a period.

30. The PUSA ad intentionally creates a false message by manufacturing fake audio and using such fake audio to create a false, captioned quotation, in both cases to make it appear as though candidate Trump said the phrase “The coronavirus, this is their new hoax.” The pieced-together audio clips thus falsely represent that the candidate stated at a Trump Campaign rally that the coronavirus is a “hoax,” when in fact, “this” refers to the Democrats’ exploitation of a pandemic and related characterization of the candidate’s response to the pandemic as inadequate.