

the public. Specifically, the false statement expresses that the Trump Campaign does not believe the coronavirus pandemic is real. WJFW-NBC's broadcast of the PUSA ad therefore defames the Trump Campaign because the ad contains false and manufactured statements represented to be made on behalf of the Trump Campaign. WJFW-NBC's broadcast of the PUSA ad caused the false and manufactured "hoax" statement to continue to be repeated by the public to disparage the Trump Campaign.

56. WJFW-NBC's broadcast of the PUSA ad has forced, and will continue to force, the Trump Campaign to expend substantial funds on corrective advertisements, and to otherwise publicize the fact that candidate Trump did not refer to the very real and very serious coronavirus pandemic as a "hoax."

57. By broadcasting the PUSA ad after the overwhelming evidence of its falsity and receiving the Cease and Desist Letter, WJFW-NBC knowingly participated in broadcasting fraudulently manufactured, false information about the Trump Campaign. In doing so, WJFW-NBC enabled and accomplished the spread of that fraudulently manufactured, false information. The PUSA ad may be replayed and shared from YouTube and other platforms, and is republished and shared through the Internet by the sharing of the ad throughout social media. In short, the false audio clips of the candidate stating: "The coronavirus, this is their new hoax" quickly became "viral."

58. The PUSA ad contains fraudulently manufactured, false information about the Trump Campaign and the ad was broadcast on WJFW-NBC so that information would be accepted as true and continuously repeated. The PUSA ad, in short, was intended to create, and did create, a "meme," to attribute a position to the Trump Campaign by falsely representing that the candidate made the statement that the coronavirus is a "hoax." This false statement has