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Case No. N25C-07-194 CLS

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

EMMANUEL MACRON and BRIGITTE MACRON, Plaintiffs, v. CANDACE OWENS, CANDACE OWENS LLC, and GEORGETOM, INC. Defendants.	C.A. No. _____ **JURY TRIAL DEMANDED**

COMPLAINT

1. In March 2024, Candace Owens, a right-wing podcaster, told the world she "would stake [her] entire professional reputation on the fact that Brigitte Macron [the First Lady of France] is in fact a man." Since then, Owens has used this false statement to promote her independent platform, gain notoriety, and make money. Owens disregarded all credible evidence disproving her claim in favor of platforming known conspiracy theorists and proven defamers. And rather than engage with President and Mrs. Macron's attempts to set the record straight, Owens mocked them and used them as additional fodder for her frenzied fan base.

2. Owens did not stop there. Retaliating against the Macrons for the "audacity" of sending her a retraction demand, Owens helmed an eight-part podcast series entitled "Becoming Brigitte" (the "Series") and accompanying X posts. Throughout the Series, Owens and her entities, Candace Owens LLC and

GeorgeTom, Inc., endorsed, repeated, and published a series of verifiably false and devastating lies about the Macrons, on which this complaint is based. These outlandish, defamatory, and far-fetched fictions included that Mrs. Macron was born a man, stole another person's identity, and transitioned to become Brigitte; Mrs. Macron and President Macron are blood relatives committing incest; President Macron was chosen to be the President of France as part of the CIA-operated MKUltra program or a similar mind-control program; and Mrs. Macron and President Macron are committing forgery, fraud, and abuses of power to conceal these secrets.

3. These claims are demonstrably false, and Owens knew they were false when she published them. Yet, she published them anyway. And the reason is clear: it is not the pursuit of truth, but the pursuit of fame. After being fired from The Daily Wire, Owens used these demonstrably false claims to promote her independent podcast, *Candace*. Owens' fan base has grown to 6.9 million followers on X and 4.47 million subscribers on YouTube. The most popular podcasts in the world have discussed her "investigation" into the Macrons' history. She launched a revamped website, CandaceOwens.com, fueled by her desire to make these specific false claims about the Macrons, without adhering to content moderation policies.

4. This is nothing new for Owens. She has built a brand on provocation, not truth. Owens labels herself as an independent "investigative journalist" while

routinely peddling misinformation under the guise of legitimate reporting. She has promoted a range of conspiracy theories, including anti-vaccine falsehoods, long-debunked antisemitic tropes such as blood libel, and Holocaust distortion—going so far as to dismiss the atrocities of Josef Mengele's medical experiments as mere "propaganda." Her content is not intended to inform but to inflame and attract attention through sensationalism and conspiracy theories.

5. Owens published the Series and related X posts with reckless disregard for the truth. Owens was repeatedly presented with credible, verifiable evidence disproving her claims—including documentation, public records, and direct outreach from the Macrons. Instead of correcting the record, she doubled down. At the time, Mrs. Macron had won French defamation claims against others who pushed these same baseless theories, underscoring both their falsity and defamatory sting. Owens knew this. Yet Owens, fully aware of the truth, has not only declined to retract her statements but has actively expanded on them.

6. These lies have caused tremendous damage to the Macrons. Defendants have subjected the Macrons to a campaign of global humiliation, turning their lives into fodder for profit-driven lies. Owens has dissected their appearance, their marriage, their friends, their family, and their personal history—twisting it all into a grotesque narrative designed to inflame and degrade. The result is relentless bullying on a worldwide scale. Every time the Macrons leave their home, they do

so knowing that countless people have heard, and many believe, these vile fabrications. It is invasive, dehumanizing, and deeply unjust.

7. Faced with this relentless and unjustified smear campaign, the Macrons are left with no choice but to seek relief through this Court to set the record straight, prevent further harm, and hold Defendants accountable for their conduct.

PARTIES AND RELEVANT NONPARTIES

8. Plaintiff Emmanuel Macron is a French citizen. President Macron has been the President of France since 2017. Prior to being elected, President Macron served as Minister of Economics, Industry, and Digital Affairs and Deputy Secretary-General to the President. President Macron married Brigitte Macron in 2007.

9. Plaintiff Brigitte Macron is a French citizen, the spouse of the current President of France, and a woman. She was born Brigitte Trogneux in Amiens, France, on April 13, 1953. She is the youngest of six children. She gave birth to three children from her first marriage to André-Louis Auzière. Mrs. Macron is a former teacher. In 2007, she married Emmanuel Macron.

10. Defendant Candace Owens is a citizen of the United States and resident and domiciliary of the state of Tennessee. Through her marriage to George Thomas Stahel Farmer, a British citizen, Owens also holds British citizenship. Owens is considered a political commentator and is a self-described conservative. Owens

hosts a podcast called *Candace*, which is published on Owens' X account by Candace Owens LLC, on CandaceOwens.com by GeorgeTom, Inc., and across various other platforms. Owens is a member and the sole manager of Defendant Candace Owens LLC. Owens maintains control of Defendant GeorgeTom, Inc.

11. Defendant Candace Owens LLC is a limited liability company organized under the laws of the State of Delaware with its headquarters in Nashville, Tennessee. Candace Owens is the sole manager of Candace Owens LLC. The company manages Owens' Facebook and X accounts, and Owens oversees and directs all content published on her social media accounts. She disseminated her false and defamatory statements through Candace Owens LLC. Candace Owens LLC is a pass-through entity named after Owens, which is solely controlled and managed by her. It is the legal entity through which Owens operates and manages her social media accounts. Owens has primary control over the management of Candace Owens LLC.

12. Defendant GeorgeTom, Inc. is a registered for-profit corporation organized under the laws of the State of Delaware, with its headquarters in Nashville, Tennessee. Owens made false and defamatory statements on her podcast, *Candace*, and published them on her website, CandaceOwens.com, which is operated by GeorgeTom, Inc. Owens oversees and directs all content that GeorgeTom, Inc. publishes on CandaceOwens.com. Owens is a member or manager of GeorgeTom,

Inc., and she has primary control over the management of GeorgeTom, Inc.

13. Nonparty Jean-Michel Trogneux is the older brother of Brigitte Macron. Jean-Michel was born in Amiens, France, on February 11, 1945, and he still lives there today.

14. Nonparty Xavier Poussard is an investigative journalist and editor of *La Lettre de Xavier Poussard*. He was a part owner of *Faits et Documents*, a confidential newsletter that published false and defamatory claims regarding Plaintiffs similar to those stated by Defendants. Owens claims the writings by Xavier Poussard inspired her false and defamatory claims. Poussard is Owens' primary source.

15. Nonparty Natacha Rey is an investigative journalist who has also spread the same false and defamatory claims about the Macrons. Rey originated the claims in France. As a result, Mrs. Macron prosecuted a libel case in France against both Natacha Rey and Amandine Roy. Rey is a key source for Owens and Poussard.

16. Nonparty Amandine Roy is a self-proclaimed "spiritual medium" who interviewed Rey in 2021 for a since-deleted YouTube video. In 2021, in a four-hour interview, Roy and Rey broadcast false and defamatory claims regarding Mrs. Macron, which prompted her libel claim in France. Roy is a leading source for Owens and Poussard.

JURISDICTION

17. This court has subject-matter jurisdiction over this civil action, and the venue is proper in this Court under Delaware law.[1]

18. This Court has personal jurisdiction over Defendant Candace Owens under Delaware law and the Due Process Clause of the United States Constitution, because she manages an LLC formed under Delaware law and the claims relate to the business of the limited liability company.[2] Defendant Owens is the manager of Candace Owens LLC and directs, controls, or participates materially in the management of Candace Owens LLC. This Court also has personal jurisdiction over Defendant Owens under Delaware law and the Due Process Clause of the United States Constitution because Plaintiffs' claims against her arise from her and her Delaware entities' actions in causing tortious injury to Plaintiffs by an act or omission outside of Delaware as they regularly do or solicit business, engage in persistent courses of conduct, and derive substantial revenue from services or things used or consumed in the State (including subscriptions and related products and services).[3] Moreover, exercising jurisdiction over Defendant Owens would not offend traditional notions of fair play and substantial justice because she could

[1] *See* Del. Const. art. IV, §§ 1, 7; 10 Del. C. §§ 541-42.

[2] 6 Del. C. § 18-109.

[3] 10 Del. C. § 3104(c)(4).

have—and should have—reasonably foreseen being haled into court in the State of Delaware, where she formed, managed, and controlled entities she used to commit tortious conduct and where her entities regularly transacts business, to account for her tortious conduct against Plaintiffs.

19. This Court has general personal jurisdiction over Defendant Candace Owens LLC under Delaware law and the Due Process Clause of the United States Constitution because it is formed under Delaware law. Exercising jurisdiction over Defendant Candace Owens LLC would not offend traditional notions of fair play and substantial justice because it could have—and should have—reasonably foreseen being haled into court in the State of Delaware, where it is formed and where it transacts business, to account for its tortious conduct against Plaintiffs.

20. This Court has general personal jurisdiction over Defendant GeorgeTom, Inc. under Delaware law and the Due Process Clause of the United States Constitution because it is incorporated in Delaware. Exercising jurisdiction over Defendant GeorgeTom, Inc. would not offend traditional notions of fair play and substantial justice because it could have—and should have—reasonably foreseen being haled into court in the State of Delaware, where it is formed and where it transacts business, to account for its tortious conduct against Plaintiffs.

FACTUAL ALLEGATIONS

President Macron rose to power in France, embodying a modern, dynamic image of leadership that resonates with many citizens.

21. President Macron was born on December 21, 1977, in Amiens, France, to Françoise Noguès, a physician, and Jean-Michel Macron, a neurologist. From an early age, he demonstrated intellectual curiosity and emotional sensitivity, nurtured in large part by his close bond with his maternal grandmother, "Manette," a schoolteacher who introduced him to literature and progressive political ideals.

22. President Macron attended La Providence, a Jesuit high school in Amiens, where he first met Brigitte Macron, a French and drama teacher. At the time, Mrs. Macron was an accomplished educator and mother of three. Their early interactions were centered around academic mentorship and a shared passion for literature and theater.

23. On April 13, 1953, in Amiens, France, Mrs. Macron was born Brigitte Trogneux—a woman. She was the youngest of six children in a prominent chocolate-making family in Amiens. An image of her birth announcement and family photo featuring Mrs. Macron as a child is below.

CARNET MONDAIN

Anne-Marie, Jean-Claude, Maryvonne, Monique et Jean-Michel TROGNEUX ont la grande joie de vous annoncer la naissance de leur petite sœur **Brigitte.**

Amiens, 1, rue Delambre.

24. Mrs. Macron married her first husband, André-Louis Auzière, in 1974 when she was 21. They had three children: Laurence, Sébastien, and Tiphaine. A photo from Mrs. Macron's and Mr. Auzière's wedding is below.

25. Mrs. Macron began her career teaching in Paris and Strasbourg before joining La Providence in the early 1990s. There, she taught French and directed the school's theater workshop.

26. Through the school's theater program, President Macron and Mrs. Macron formed a deeper intellectual connection. During a school production of *Jacques and His Master*, President Macron played the lead role under Mrs. Macron's direction. He later undertook an ambitious rewrite of another play, *The Art of Comedy*, to create roles for more students. Mrs. Macron agreed to guide him, and the two began meeting regularly to collaborate on the project.

27. At all times, the teacher-student relationship between Mrs. Macron and President Macron remained within the bounds of the law. But, when President Macron's parents became aware of his strong feelings for his teacher, they decided to transfer him to Lycée Henri-IV in Paris. Mrs. Macron encouraged him to leave and was confident he would fall in love with a peer. Yet, before his departure, he told her, "Whatever you do, I will marry you."

28. President Macron completed his studies at Lycée Henri-IV and went on to earn a degree in philosophy from Paris Nanterre University, followed by a master's degree in public affairs from Sciences Po. He then attended the prestigious École Nationale d'Administration ("ENA"), which trains France's top civil servants. After graduating, he began his career as a finance inspector at the French Ministry of Economy and Finance.

29. Over the years, President Macron and Mrs. Macron kept in touch, and their love deepened. In 2006, Mrs. Macron divorced her first husband, and in 2007,

she married President Macron. Their relationship has remained strong and supportive, marked by a deep intellectual partnership.

30. In 2008, President Macron joined Rothschild & Cie Banque as an investment banker, where he achieved notable success. His public service career resumed in 2012, when he joined President François Hollande's administration as Deputy Chief of Staff and Economic Advisor. In 2014, he was appointed Minister of the Economy, where he implemented key economic reforms, later known as the "Macron Law."

31. As Hollande's popularity declined amid economic difficulties and rising nationalism, President Macron began distinguishing his platform from that of the sitting administration. He recognized the need for a new centrist movement to address the challenges of the moment. In 2016, he founded the political movement *En Marche!* ("Forward!"), which he described as a "democratic revolution." Later that year, he resigned from his ministerial post and declared his candidacy for president. His campaign emphasized pro-European, centrist policies and quickly gained national momentum.

32. Mrs. Macron joined her husband on the campaign trail, acting as a central figure and key advisor to his campaign. Following the first round of elections in April 2017, President Macron publicly credited Mrs. Macron for his success, saying: "Without her, I wouldn't be me." He went on to win the presidency in May

2017.

33. Upon assuming office, President Macron formally established an official, unpaid role for the First Lady. In this capacity, Mrs. Macron represents France in diplomatic settings, supports charitable causes, and engages in initiatives related to education, health, disability, and child protection. Her responsibilities are supported by an advisory cabinet and two presidential aides.

34. Mrs. Macron is a strong, independent woman who has consistently forged her own path. Throughout her life, she has refused to be confined by societal expectations or limited by traditional roles. As First Lady of France, she has made deliberate, thoughtful choices rooted in conviction and purpose. Far from merely supporting her husband from the sidelines, Mrs. Macron has been an active and engaged partner—respected for her intellect, influence, and refusal to simply do as she is told. Her life and work embody a commitment to education, civic engagement, and personal agency.

Brigitte Macron is the target of a vicious conspiracy crafted by those threatened by her influence.

35. Around March 2021, Natacha Rey—who describes herself as an independent journalist—published on her now-deleted Facebook profile false and defamatory claims alleging that Mrs. Macron is a transgender woman perpetrating identity theft. These baseless allegations initially failed to attract significant public attention. But that changed when Rey began working with Xavier Poussard.

36. In May 2021, Poussard began publishing a multi-issue series entitled "The Mystery of Brigitte Macron." That series recycled and expanded on numerous falsehoods, including the defamatory insinuations regarding Mrs. Macron's alleged biological sex—allegations later amplified and expanded on by Owens.

37. In September 2021, Rey collaborated with Poussard to co-author a publication in *Faits et Documents*, a fringe magazine reportedly influential within far-right circles in France. *Faits et Documents* was founded in 1996 by Emmanuel Ratier, a known figure of the French far-right.

38. On December 10, 2021, Rey appeared on the YouTube channel of Amadine Roy, a self-described spiritual medium. Roy conducted a four-hour interview with Rey, during which Rey reiterated the defamatory claims that Mrs. Macron was, in fact, born as a male named Jean-Michel Trogneux (which is the actual name of Mrs. Macron's brother) who stole the identity of Brigitte Trogneux. They also claimed that Mrs. Macron's first husband never existed and that she did not carry her three children. The video quickly went viral, amassing more than 450,000 views before it was removed by YouTube.

39. In December 2021, the hashtag "#JeanMichelTrogneux" began trending on X,[4] with users pointing to the fact that there are few public photos of

[4] At the time of the posts, X was known as "Twitter."

Mrs. Macron from her youth and that she often "hides her neck" as "proof" she is transgender. From that point forward, the false narrative was amplified by prominent far-right influencers in France.

40. In September 2024, a French court held that Rey and Roy defamed Mrs. Macron for spreading false rumors that Mrs. Macron was born Jean-Michel Trogneux and later stole the identity of Brigitte Trogneux. The defamation suit confirmed that Rey's and Roy's claims that all documents related to Mrs. Macron's birth, marriage, divorce, and childbearing were forged to conceal her actual sex were false. Jean-Michel participated in the trial. Rey and Roy were fined €500 and ordered to pay €8,000 to Mrs. Macron and €5,000 to her brother in civil damages.[5]

41. After multiple victories against Rey and Roy at home in France, the Macrons thought these false claims had been put to bed. But, as discussed below, Owens turned this flame into a fire.

Owens is a far-right conspiracy theorist who thrives on making outrageous claims, prioritizing shock value and follower growth over truth or responsible discourse.

42. Owens did not always espouse extreme right-wing ideals. She was born in White Plains, New York, and raised in Stamford, Connecticut. Owens graduated

[5] An interim appellate court overturned the judgment on July 10, 2025, and the case is now on appeal to France's highest court, the Court of Cassation. Importantly, the appellate court did not overturn the judgment on the basis that the statements were true, but on other grounds. Mrs. Macron firmly believes that all the statements included in that proceeding are false and defamatory, and that the highest court will uphold her claims.

from Stamford High School in 2007 and attended the University of Rhode Island before leaving due to financial issues.

43. Following her departure from university, Owens completed an internship at *Vogue* magazine and was later hired as an administrative assistant at a private equity firm in New York. In 2015, she left the financial sector to start a marketing agency called Degree180. Degree180's website featured a blog that gained notoriety for publishing progressive, anti-conservative, and anti-Trump content—the exact opposite of her current views.

44. That all changed in 2016 when Owens launched SocialAutopsy.com, a website that aimed to expose individuals responsible for online harassment by publishing their identities. The project was widely condemned across the political spectrum, with both conservative and progressive voices expressing concerns over privacy and potential misuse. In retaliation, critics shared Owens' personal information online. Owens attributed the widespread criticism and retaliation efforts to two progressives who had attempted to convince Owens to abandon the project. While Owens was being criticized by those who purportedly shared her beliefs, she received support from prominent figures associated with the far-right. Owens publicly stated that this was the catalyst for her ideological shift, remarking, "I became conservative overnight." In late 2016, she began expressing support for Donald Trump's presidential run.

45. By 2017, Owens had completely flipped political sides, aggressively ramping up her online criticism of liberal ideology and policies through her YouTube channel. She further amplified her voice and newfound point of view to young conservatives through her role as Communications Director of Turning Point USA, a nonprofit organization that advocates for conservative ideals on high school and college campuses nationwide.

46. In 2019, Owens founded the Blexit movement, which encourages Black Americans to leave the Democratic Party. That same year, she launched *The Candace Owens Show*, a podcast on YouTube, where she interviewed conservative figures. In August 2019, she married George Farmer, a British citizen and the son of Lord Michael Farmer, a former treasurer of the Conservative Party. When the couple met in December 2018, George Farmer was chairman of Turning Point UK and later became CEO of Parler, a far-right social media platform.

47. As her visibility grew, Owens also became involved in French far-right politics. She was invited to be the headline speaker at the Convention de la Droite in Paris in September 2019. The Convention was organized by associates of Marion Maréchal, the niece of Marine Le Pen, President Macron's political adversary. During her speech, Owens criticized President Macron, calling him a "weak" leader. Shortly after the event, Owens tagged Maréchal in a comment to an X post showing a video of the two speaking: "In the near future, there will be a deeper alliance

between France and the United States. … Thank you, @MarionMarechal for widening my understanding of the challenges faced by France today." Maréchal replied favorably, thanking Owens for her courage. Owens' criticism of President Macron continued and increased after the 2022 Russian invasion of Ukraine.

48. Over the years, Owens' network has included prominent conservative figures known for extreme or conspiratorial rhetoric, such as Charlie Kirk, Alex Jones, Nigel Farage, and even Kanye West. During Paris Fashion Week in the Fall of 2022, Owens appeared with West wearing controversial "White Lives Matter" t-shirts—a slogan condemned by civil rights groups as a white supremacist response to the Black Lives Matter movement. West posted a photo of him and Owens wearing the shirts with the caption, "Everyone knows that Black Lives Matter was a scam. Now it's over, you're welcome." Around this time, West announced plans to buy Parler, Farmer's company. The deal collapsed shortly after Adidas ended its contract with West for making antisemitic comments.

49. In 2021, Owens joined The Daily Wire, where she hosted her talk show, *Candace Owens*, until her departure in 2024. Owens left The Daily Wire in March 2024 following public clashes with co-founder Ben Shapiro over her increasingly antisemitic rhetoric. In the wake of the October 7 Hamas attacks on Israel, Owens voiced strong pro-Palestinian and anti-Israel sentiments. Her commentary escalated from political criticism to overt antisemitic conspiracy theories. On her talk show,

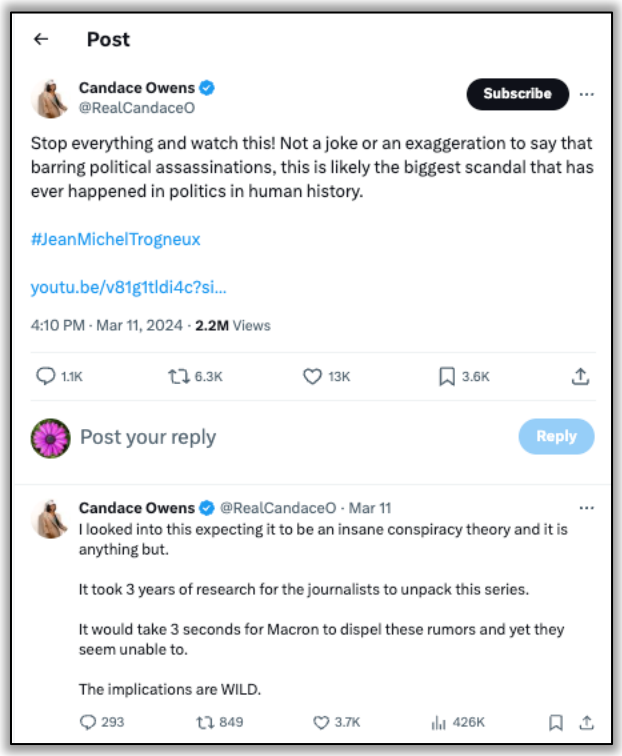
Owens alleged that secret Jewish "gangs" commit "horrific things" in Hollywood, and on social media, she repeated the long-debunked "blood libel" myth that Jewish people drink the blood of Christian children. These comments justifiably received widespread condemnation.

50. Following her departure from The Daily Wire, Owens did not slow down—in fact, she seized the opportunity to become even more extreme. In June 2024, she independently relaunched her talk show under the name *Candace* on YouTube. In September, she posted an interview with Kanye West, during which both claimed that Jewish people control the media. YouTube removed the video and suspended and demonetized her channel for violating hate speech policies. Despite this, Owens persisted in promoting conspiracy theories, including calling Nazi medical experimentation on Jewish people during the Holocaust "bizarre propaganda." These actions led the Australian government to deny her a visa in 2025, citing a risk that her presence could "incite discord" and concluding that "Australia's national interest is best served when Candace Owens is somewhere else."

51. Despite the inflammatory and demonstrably false nature of many of her public statements, Owens' audience has continued to grow. As of July 2025, Owens has over 4.47 million subscribers on YouTube, and her videos have garnered millions of views. She has 6.9 million followers on X.

Owens repeats the outlandish claim that Brigitte Macron was born a man on The Daily Wire precisely because she knew its shock value would boost her visibility.

52. In March 2024, just prior to her departure from The Daily Wire, Owens began promoting the false claim that Mrs. Macron was born a man. On March 11, 2024, Owens published an episode of her The Daily Wire podcast *Candace Owens* titled "INSANE. This Is The BIGGEST Political Scandal In Human History," which reported on the Brigitte Macron conspiracy theory that was making its way through the courts in France. Owens was the first to bring this theory to the U.S. media and to a global audience. That same day, Defendants announced the video in an X post, repeating that it is "the biggest scandal that has ever happened in politics in human history":



53. Owens claimed she learned about this theory from a 2021 debunking story published by Daily Mail.[6] Owens falsely claimed the article was recent, despite it being published more than three years ago, likely to make it appear that she just happened upon this story rather than searching for a salacious conspiracy to increase viewership. Shockingly, Owens claimed "there was no debunking whatsoever."

54. But that is false. The article included multiple photos of Mrs. Macron as a child and informed that separate journalists met both Mrs. Macron's brother, Jean-Michel, and Mrs. Macron's late ex-husband, André-Louis Auzière. Owens omitted these facts.

55. The next day, Owens followed up with another defamatory X post, stating that she "would stake [her] entire professional reputation on the fact that Brigitte Macron is in fact a man."

[6] Paul Bracchi and Peter Allen, *The proof France's First Lady WASN'T born a man: The true story of Brigitte Macron's controversial background is revealed as wicked slur is spread by the French far-Right to damage the election hopes of her husband*, Daily Mail (Dec. 31, 2021, at 18:08 EDT), https://www.dailymail.co.uk/news/article-10359625/The-proof-Frances-Lady-WASNT-born-man.html.

56. On March 13, 2024, Owens released another episode of *Candace Owens* titled "Media Meltdown! France's First Lady Exposed," repeating and expanding on her false claims.

57. From the start, Owens could not keep her story straight. For example, on Owens' March 21, 2024, appearance on the nationally syndicated radio show, *The Breakfast Club* radio show, she said that the Macrons "tried to sell to the press a fake photo which got debunked. It was actually Jean-Michel's daughter."[7] She has never repeated this claim because it is demonstrably false.

58. After Owens was dismissed from The Daily Wire on March 22, 2024, the outlet did the right thing and immediately removed Owens' March 11 and 13

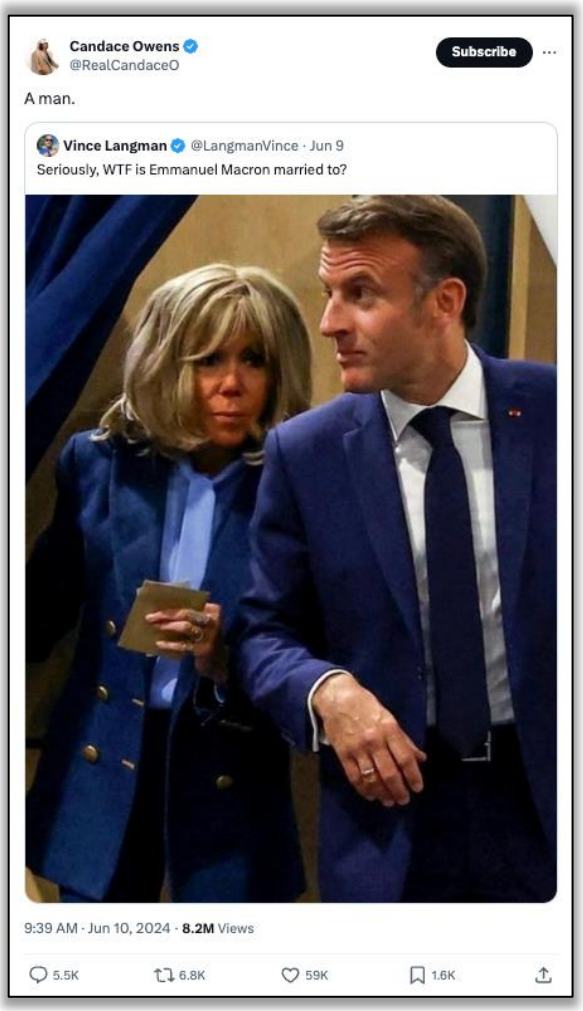
[7] Video posted by The Breakfast Club (@BreakfastClubPower1051FM), YouTube, *Candace Owens On Black America, Congressional Puppets, Donald Trump, Kanye West, T.I. + More* (Mar. 21, 2024), https://www.youtube.com/watch?v=goIrzPIh8yA.

episodes, but each remains available online on other platforms.

Fired from The Daily Wire and faced with clear evidence debunking her claim, Owens continues to push the conspiracy—now from her own podcast.

59. Despite the extensive and publicly available evidence confirming the truth about the Macrons' identities and history, Owens persisted in spreading her false and defamatory allegations. Even after her termination from The Daily Wire—reportedly due, in part, to her repeated dissemination of baseless conspiracy theories—Owens showed no sign of retracting or tempering her allegations. She continued promoting her preconceived narrative, undeterred by professional consequences or contradictory facts.

60. Defendants launched Owens' independent podcast, titled *Candace*, on June 10, 2024. Knowing her false claims about the Macrons had caught fire in March, Owens seized the moment, recycling them starting the very day she premiered *Candace*—Defendants took to X, declaring Mrs. Macron was a man. Fueled by sensational claims, the show quickly gained attention, earning the second spot on Edison Research's list of top new podcasts for 2024.



61. On June 12, 2024, Owens appeared on *Piers Morgan Uncensored* to push more false and defamatory claims about the Macrons—claims even Piers Morgan, known for his provocative style, dismissed as absurd. Owens doubled down the next day by republishing clips from the interview, repeating her false allegations on the June 13 episode of *Candace*.[8]

62. Recognizing that her false claims about the Macrons were drawing

[8] Video posted by Candace Owens (@RealCandaceO), YouTube, *SMACKDOWN! Piers Morgan Tried To Ambush Me...*, Candace Ep. 4 (Jun. 13, 2024), https://www.youtube.com/watch?v=yXyVzAn_EMo.

significant attention, Owens escalated further. On June 17, 2024, Defendants released an episode titled, "So...Is Brigitte Macron A Man?" to repeat the discredited allegations from Owens' March episodes that had since been deleted by The Daily Wire.[9] Seeking to drive traffic to her new venture and expand her claims, Owens opened by warning that the Macrons were "going to come for [her] life." She then repeated the categorically false claim that the Macrons had deployed the secret service to intimidate and detain journalists to hide the truth of Mrs. Macron's transition and identity theft. Finally, she linked these allegations to a broader, equally baseless conspiracy theory: that the world is being run by a gang of Satanic pedophiles masquerading as Jewish people.

63. Projecting, Owens claimed the Macrons were not behaving in ways one does "when you are telling the truth." She claimed there are no photos from the first 30 years of Mrs. Macron's life, but contradicted herself just moments later by admitting that photos of a young Mrs. Macron had been released; she just does not believe they are real.

64. The clicks kept coming, so Owens kept going, seizing every opportunity to promote her salacious claims. Defendants released another episode

[9] Video posted by Candace Owens (@RealCandaceO), YouTube, *So...Is Brigitte Macron A Man?*, Candace Ep. 6 (Jun. 17, 2024), https://www.youtube.com/watch?v=mXGUHYVUZZk.

mentioning the conspiracy on June 26, 2024.[10] On July 1, 2024, Owens repeated her false claims in an episode encouraging viewers to reject scientific findings in favor of following their gut.[11] On July 7, 2024, Owens presented these false claims on *The Jimmy Dore Show*.[12] Jimmy Dore is a stand-up comedian turned political commentator who regularly promotes conspiracy theories.

65. Defendants went so far as to create and sell merchandise to promote these claims. On July 8, 2024, Defendants posted a photo on X of Owens in a t-shirt showcasing a fake *Time Magazine* "Man of the Year" cover featuring Mrs. Macron. The shirt sold out.

[10] Video posted by Candace Owens, (@RealCandaceO), YouTube, *Piers Morgan Caught LYING About Brigitte Macron*, Candace Ep. 13 (Jun. 26, 2024), https://www.youtube.com/watch?v=sTXqHi0lOX8.

[11] Video posted by Candace Owens, (@RealCandaceO), YouTube, *Why I Left This Religion*, Candace Ep. 16 (Jul. 1, 2024), https://www.youtube.com/watch?v=8wlq-Q4YgtM&t=1s. .

[12] Video posted by The Jimmy Dore Show (@therealjimmydoreshow), YouTube, *Candace Owens EXPLOSIVE Take On Macron's Wife Will Blow Your Mind!* (Jul. 7, 2024), https://www.youtube.com/watch?v=81ec0BTdAd0.

66. Owens went so far as to claim the 2024 Olympic opening ceremony—a tribute to Greek mythology—was designed to "honor Brigitte Macron," because she is transgender.[13] This claim is not only absurd, but self-defeating: Owens also insists Mrs. Macron's biological sex is a "state secret," making such a tribute impossible even by her own logic.

[13] Candace: *The Olympics Exposed Brigitte* Macron, Candace Ep. 34 (Apple Podcasts, Jul. 29, 2024), https://podcasts.apple.com/us/podcast/the-olympics-exposed-brigitte-macron-candace-ep-34/id1750591415?i=1000663732510.

67. She then escalated her rhetoric, falsely alleging that the Macrons are part of "a very small group of elite oligarchs who routinely practice homosexuality and pedophilia, believe in Baphomet, and worship a transgender deity"[14] that controls the world. This is yet another baseless, inherently implausible claim—contradicted by public evidence and common sense.

68. Owens bolstered this claim by reposting on X a takedown of the Opening Ceremony and Mrs. Macron by another provocative figure, Archbishop Viganò, who had just been excommunicated from the Catholic Church.[15] Yet again, searching for the most controversial spin, Owens posted on X that "Brigitte Macron is a transvestite," calling it a "demonic state secret" and falsely claiming that Mrs. Macron is a rapist. Owens used the conspicuous tag "#ChristIsKing" to garner even more attention.

69. Continuing to capitalize on the attention of sensational figures and known liars, Owens published a post by Alex Jones—a notorious defamer who owes $1.5 billion to the families of the Sandy Hook shooting victims for his malicious

[14] Baphomet is a Satanic figure depicted as a "winged hermaphrodite with a torch between his horns and a pentagram on his forehead." James Morgan, *Decoding the symbols on Satan's statute*, Aug. 1, 2015, https://www.bbc.com/news/magazine-33682878.

[15] Candace Owens (@RealCandaceO), X (Jul. 29, 2024, at 09:17 ET), https://x.com/RealCandaceO/status/1817912361736392858.

lies—and repeated her false allegations.[16] Jones is one of the most unreliable sources imaginable. Owens stated that "Brigitte Macron was born Jean-Michel Trogneux. He lived as a man for about 30 years before 'transitioning' to Brigitte. While he lived as a man he fathered 3 children." Again, Owens tagged "#ChristIsKing."

70. Yet again aligning with the most controversial figures, Defendants brought on Andrew Tate—a self-proclaimed misogynist charged with rape and human trafficking.[17] Owens proved that no amount of credible evidence would convince her to abandon her preconceived narrative when she platformed Tate's claim that the French election was rigged like the 2020 U.S. election.[18] Owens went further, claiming the Macrons are "being blackmailed and they are being selected for these positions." She dismissed all critics by saying "the matrix" is targeting her for exposing the supposed homosexuality and pedophilia taking place in the world.

71. On August 30, 2024, Owens interviewed Poussard, the publisher of the defamatory *Faits et Documents* series on Mrs. Macron.[19] Poussard became Owens'

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[16] Candace Owens (@RealCandaceO), X (Jul. 29, 2024, at 10:59 ET), https://x.com/RealCandaceO/status/1817937998652023085.

[17] Video posted by Candace Owens (@RealCandaceO), YouTube, *Andrew Tate x Candace Owens*, Candace Ep. 46 (Aug. 15, 2024), https://www.youtube.com/watch?v=iwOXLfVsieA.

[18] This fake news has also been debunked. *US Dominion, Inc. v. Fox News Network, LLC*, No. N21C-03-257 EMD, 2023 WL 2730567, at *21 (Del. Super. Ct. Mar. 31, 2023) ("The evidence developed in this civil proceeding demonstrates that is **CRYSTAL** clear that none of the Statements relating to Dominion about the 2020 election are true.") (emphasis in original).

[19] Candace: *EXCLUSIVE: Meet the Journalist Who EXPOSED Brigitte Macron*, Candace Ep. 56, (Spotify Podcasts, Aug. 30, 2024),

(Continued…)

primary source—quite possibly her only source—for her future reporting. In the interview, Owens and Poussard agreed that the Macrons are perpetrating fraud regarding Mrs. Macron's identity and President Macron's political independence and integrity. They further claimed that Mrs. Macron's nephew resembles President Macron and inferred that the Macrons' relationship was incestuous. Poussard directly accused Mrs. Macron of abuse of a minor, impersonation, and identity theft. Owens endorsed, adopted, and expanded on these claims, linking them to her broader conspiracy theory involving an extensive network of satanic pedophiles.

72. Every time Owens faced consequences for repeating these outrageous allegations, she refused to take responsibility and instead cast herself as the victim and blamed others. For example, on September 11, 2024, Defendants embedded the August 30 episode in an X post claiming that YouTube removed the video for exposing the media's complicity in covering up pedophilia, when the truth is that Owens did not abide by YouTube's content moderation policies, which are designed to guard against misinformation and hate speech.

The Macrons flatly debunk the conspiracy in a retraction demand to Owens—but she mocks their response, ignores the facts, and doubles down with even more reckless claims.

73. The Macrons, through their counsel, sent a detailed retraction demand

https://open.spotify.com/episode/5nn9gkM9XQ3W2RfTsoM2Kz?si=dZthIgVGTIqfShzdYw8UXg.

letter to Owens via email on December 3, 2024. The December Retraction Demand explained the falsity of Owens' defamatory statements and included an abundance of evidence that Mrs. Macron was born a woman named Brigitte Trogneux; that she was not a blood relative of President Macron; and that the Macrons were not being controlled or blackmailed by any group of people. Owens did not respond to the December 3 email.

74. Owens then repeatedly ignored multiple additional attempts by the Macrons to engage. The Macrons sent a follow-up email on December 18, 2024, which went unanswered. On January 8, 2025, the Macrons contacted Owens' former legal counsel to facilitate communication but received no response. Next, the Macrons attempted to personally serve the December Retraction Demand on January 9, 2025, but were first ignored, then blocked by Owens' counsel—who ultimately agreed to accept service by email.

75. The December Retraction Demand explicitly denied each of Owens' claims and presented evidence that conclusively disproved them.

76. The December Retraction Demand reminded Owens that the very Daily Mail article she cited as support for her conspiracies told readers that the *Courrier Picard*, a daily newspaper in Amiens, France (Mrs. Macron's hometown), ***included Mrs. Macron's birth announcement***. The birth announcement states that Brigitte Trogneux was born on April 13, 1953, and that her siblings, "'Anne-Marie, Jean-

Claude, Maryvonne, Monique and Jean-Michel Trogneux, have great joy in announcing the arrival of ***their little sister, Brigitte.***'"

CARNET MONDAIN

Anne-Marie, Jean-Claude, Maryvonne, Monique et Jean-Michel **TROGNEUX** ont la grande joie de vous annoncer la naissance de leur petite sœur **Brigitte.**

Amiens, 1, rue Delambre.

77. Defendants knew this information, but Owens omitted it from her Series precisely because it contradicted the preconceived narrative she intended to tell. This omission was deliberate and is evidence of actual malice.

78. The December Retraction Demand reminded Owens that in addition to a first communion photo and family photo, there are additional publicly available photos of Mrs. Macron as a child. In one such photo, Mrs. Macron is playing in a garden as a young girl. This photo was mentioned in the 2021 Daily Mail debunking article and the December Retraction Demand, but Owens never shared it with her viewers because it does not fit her preconceived narrative.

79. The December Retraction Demand reminded Owens that Mrs. Macron's marriage to André-Louis Auzière and his existence were well documented. The most obvious proof of his existence is the three children he fathered with Mrs. Macron, all of whom have acknowledged him as their father and adopted his last name. Initially, Owens falsely stated that there were no publicly available photos of Mr. Auzière. The December Retraction Demand reminded Owens that a publicly available photo exists of Mr. Auzière from his wedding to Mrs. Macron. Since then, Owens has found at least one additional photo through

her relationship with Xavier Poussard.

80. To discredit this photo, Owens initially claimed that the subjects are not Mr. Auzière and Mrs. Macron, but Jean-Louis Auzière with his first wife, Susan Spray. The December Retraction Demand reminded Owens that Jean-Louis debunked this claim, stating, "[w]hen André-Louis got married, I was 8 years older and I was working in Germany. There may be a slight family resemblance, but that's not to say that we are the same person."[20] Indeed, Jean-Louis has testified in French court that the photo is not of him and won a defamation claim against Rey and Roy on that basis.

81. When Owens was confronted with this information, she changed her

[20] Julien Lagarde, *Trogneux affair: in Normandy, a couple collateral victims of rumors surrounding Brigitte Macron*, Le Pays d'Auge, (May 16, 2022, at 19:23 CEST), https://actu.fr/normandie/lisieux_14366/affaire-trogneux-en-normandie-un-couple-victime-collaterale-des-rumeurs-autour-de-brigitte-macron_50917623.html.

theory, but rather than accept this photo for what it is (an image of Mrs. Macron from her marriage to Mr. Auzière), Owens concocted a new story. She changed course in the Series to claim that Mr. Auzière is in the photo, but that Mrs. Macron is not. Instead, Owens claimed that it was another woman named Brigitte Trogneux and that Mrs. Macron refused to verify that the image was of her. Another lie.

82. Owens initially told her audience that no journalists could find Mr. Auzière, but this is plainly false. The December Retraction Demand reminded Owens that another Daily Mail debunking article explained that "[r]eporters for several outlets, including the Mail, ***tracked André-Louis down to Lille several years ago***," but he declined to comment.[21] That aligns with his family's statements that he was a very private man.

83. The December Retraction Demand stated that Mr. Auzière passed away on December 24, 2019. His and Mrs. Macron's daughter, Tiphaine, spoke about his death afterward and noted that he was buried in "the strictest privacy" and that he was "a nonconformist who valued his anonymity more than anything." Tiphaine ended by stating, "he must be respected." In her earlier reporting, Owens distorted these words and the family's request for privacy into "a warning, a threat almost, not

[21] Guy Adams, *Revealed: Truth behind the conspiracy theory Brigitte Macron is really a MAN - as the Mail unmasks the woman being sued over the viral rumour*, Daily Mail, (Mar. 22, 2024, at 22:12 EDT), https://www.dailymail.co.uk/femail/article-13228445/jolly-clairvoyant-viral-conspiracy-Macron-deny-wife-Brigitte-MAN.html.

to look any further." In the Series, after being confronted with proof of Mr. Auzière's existence through his documented death and funeral, she again changed course and distorted the Auzière family's desire for privacy into a plot to coverup wrongdoing.

84. The December Retraction Demand also informed Owens that Jean-Michel Trogneux is alive and well in Amiens. Emmanuelle Anizon, a journalist for *L'Orbs* magazine, reported having contact with him in Amiens in September 2023. This, too, was included in the Daily Mail's 2024 debunking article.[22] In fact, Ms. Anizon wrote an entire book disproving the disinformation campaign surrounding Mrs. Macron.[23] ***Shockingly, Owens cites Ms. Anizon's book in the Series but fails to tell her viewers it completely disproves her central thesis.***

85. The December Retraction Demand provided evidence that Jean-Michel ***has*** recently appeared in public. He attended President Macron's investitures in 2017 and 2022, and the December Retraction Demand provided links to publicly available videos from those events. Not only was Jean-Michel present, but also in the same frame as Mrs. Macron—conclusive evidence that debunks Owens' demonstrably false claims:

[22] *Id.*

[23] Emmanuelle Anizon, *L'affaire Madame: Le jour où la Première dame est devenue un homme: anatomie d'une fake news* (2024).

2017 Investiture[24]

2022 Investiture[25]

[24] Video posted by BFMTV (@BFMTV), YouTube, *Live Passation de pourvoir Macron/Hollande – Edition Spéciale BFMTV* (May 14, 2017), https://www.youtube.com/watch?v=9tJPSCnIO_U.

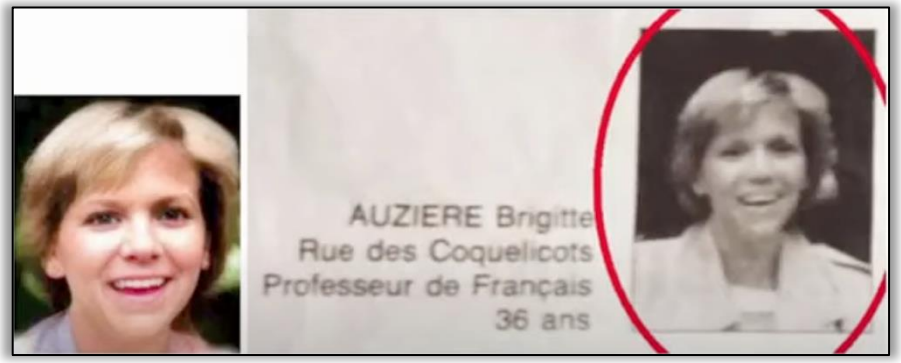
[25] Élysée, *Cérémonie d'investiture du Président de la République.*, (YouTube, May 7, 2022) https://www.youtube.com/watch?v=uuaYB8tIaJk.

86. The December Retraction Demand informed Owens that Jean-Michel's defamation claims against Rey and Roy prove his existence and that he is not Mrs. Macron. At Rey and Roy's June 19, 2024 trial, Jean-Michel's attorney presented both Mrs. Macron's and Jean-Michel's electoral cards to the court, demonstrating that they had both voted in the European Elections on June 9, 2024, in different towns. As a result of that trial, Rey and Roy were ordered to pay Jean-Michel €5,000 in civil damages. This information is also publicly available, but Owens has never informed her audience of these facts, which disprove her claim.

87. The December Retraction Demand explicitly stated that Mrs. Macron is the biological mother of her three children, proving that she was born as woman and has not engaged in identity theft. In her earlier reporting, Owens claimed that Mrs. Macron ***fathered*** her three children with Brigitte Proba-Auzière, whom she falsely claimed was the niece of Jean-Louis Auzière, the uncle of Mrs. Macron's late ex-husband. She accused Jean-Louis of forging the children's birth certificates to hide Mrs. Macron's secret. This is the same Jean-Louis whom she claimed was in the wedding photo of Mrs. Macron and her first husband, and who has successfully sued Rey and Roy for defamation. Owens did not repeat these claims in the Series, but she has never retracted the prior false claims.

88. Further, Owens initially claimed that the photo of Mrs. Macron—in which she is described as a thirty-six-year-old teacher named Brigitte Auizère—is

not actually of her, but rather of the fictitious Brigitte Proba-Auzière. In doing so, Owens recklessly disregarded the facts that the photographed woman in this picture (1) had the same name as Mrs. Macron did at the time; (2) had the same occupation that Mrs. Macron had at the age of thirty-six; and (3) bears a striking resemblance to a younger version of Mrs. Macron. Owens later admitted that this was false but she never removed the episodes including this false claim.



89. When Owens realized her claims about Mrs. Macron's children (i.e., that she ***fathered*** her children with the fictitious Brigitte Proba-Auzière) could not possibly be true, she dropped them—offering no alternative explanation, just a gaping hole. She counted on her audience being too captivated—or too unquestioning—to notice the gap, let alone call her out on it. The reason is clear: Any theory that claims Mrs. Macron is not the mother of her children recklessly disregards the striking resemblance between her and her daughters:

90. The December Retraction Demand reminded Owens that Mrs. Macron, Jean-Michel, and Jean-Louis, along with his wife, Catherine, have sued the originators of this theory, Rey and Roy, for defamation. On September 12, 2024, Rey and Roy were found guilty of defamation and ordered to pay damages to Mrs. Macron and Jean-Michel. Before that, the women were found guilty and fined for lying about Jean-Louis and Catherine. Owens disregarded this credible evidence because it contradicted her preconceived narrative.

Owens responds with ridicule and doubles down.

91. On January 10, 2025, Defendants posted on X that the Macrons had sent Owens a legal letter.[26] That post demonstrated Owens' loose relationship with

[26] Candace Owens (@RealCandaceO), X (Jan. 10, 2025, at 15:29 ET), https://x.com/RealCandaceO/status/1877814980399030350.

the truth. In her X post, Owens claimed that "in mid-November, [she] made contact with a journalist claiming to have a trove of evidence to support the claim that the first lady of France lived as a man named Jean-Michel Trogneux before becoming and transitioning to Brigitte." Owens crafted the post to suggest that she had a new source, but the journalist was actually Poussard, whom she had already met and interviewed. Owens claimed that "just 10 days after [their] initial correspondence," the Macrons sent her a legal letter—proving that Owens saw and ignored the Macrons' initial outreach in early December. Owens claimed the Macrons "demanded [she] not publicize" the letter—in fact, the letter had only a heading stating it was not for publication or attribution, a far cry from the demand she claimed. Most troubling, Owens promised she would publicize the December Retraction Demand, but she never did. And the reason is clear—the 33-page December Retraction Demand conclusively debunked Owens' claims and exposed her lies.

92. Owens knows a media firestorm when she sees one. Sensing an opportunity to amplify her claims and attract more attention, she falsely asserted that Tucker Carlson—a high-profile political commentator—was named in the December Retraction Demand. Defendants tagged Carlson on X, banking on the controversy to draw him in and further spread Owens' false narrative.

93. Once again framing herself as a victim, in Defendants' January 10, 2025 episode of *Candace*, Owens claimed the Macrons attempted to personally serve her with the December Retraction Demand to "intimidate" and "terrify" her.[27] However, she neglected to tell her viewers that, in fact, the Macrons only resorted to personal service after she ignored multiple emails. Owens claimed the Macrons "strenuously requested" that she not publicize the December Retraction Demand and that the letter said "all over it" that it was not to be shared. Another, at best, gross exaggeration—the letter contained only a standard first-page heading: "Confidential – Not For Publication Or Attribution."

94. Owens continued to refuse to meaningfully engage with the December

[27] Video posted by Candace Owens (@RealCandaceO), YouTube, *I Got A Legal Threat From A Sitting President…*, Candace Ep. 130 (Jan. 10, 2025), https://www.youtube.com/watch?v=tJtAUKgkqc0.

Retraction Demand. Instead, she intentionally led her audience to believe that the Macrons refused to say whether Mrs. Macron was born a woman or address Owens' other claims. But Owens knew that the December Retraction Demand addressed each of her claims and proved them to be false. Owens cherry-picked portions of the December Retraction Demand to read to her audience but did not present the evidence against her claims that it contained—because it contradicted her preconceived narrative. Indeed, Owens told her viewers that she had evidence disproving portions of the December Retraction Demand, but she was "not going to tell you that today." Spoiler: She never presented it.

95. Owens leveraged the December Retraction Demand to generate buzz and build anticipation for her upcoming episodes. Again, Owens implied she had a new source with "a trove of evidence," but that source was Poussard, whom she had already presented to her audience. She then falsely claimed that the timing of the December Retraction Demand demonstrated "the communications of the journalist are being monitored," but admitted she had no evidence to support this.

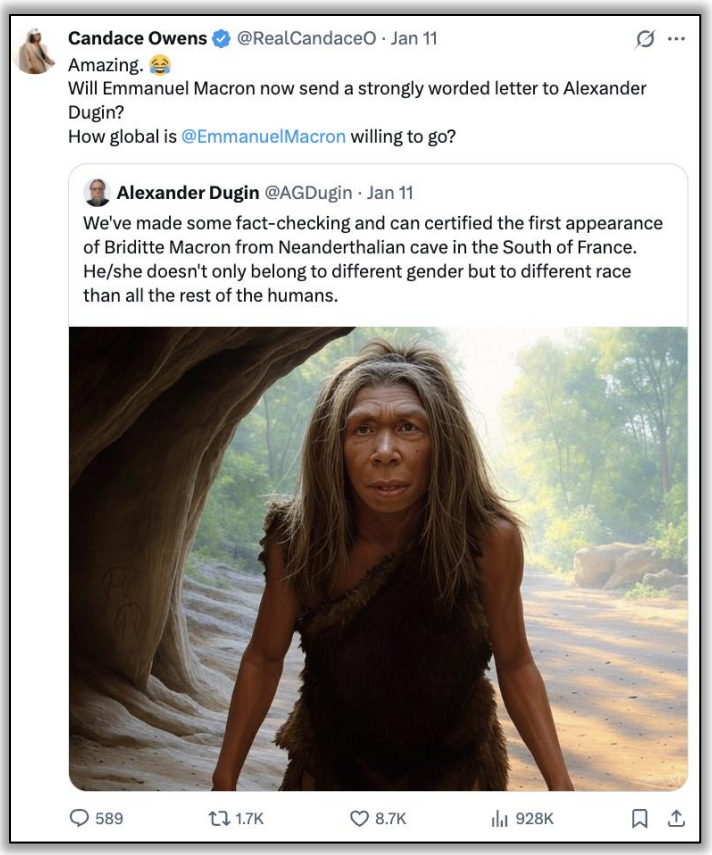
96. Rather than reconsider her false claims, Owens doubled down, blaming the Macrons for her content being removed from YouTube and vowing not to retract what she "deems to be the truth."

97. On January 11, 2025, Defendants posted on X that "all correspondence

between our legal teams will be available for the public to read."[28] Owens has not lived up to this promise because she knows the legal correspondence contradicts her false claims. As with her other false allegations, she promised "strong evidence" that the first communion photo was not Mrs. Macron (but never delivered it). She also pretended the Macrons had not definitively denied her claims—ignoring the clear, contradictory evidence they already provided.

98. Defendants continued to mock the Macrons' attempt to correct the record, demonstrating that Owens was not interested in the truth. She would rather make salacious and false claims to boost her revenue. For example, Defendants reposted and expanded on a post from Alexander Dugin (a far-right Russian philosopher and controversial figure) featuring Mrs. Macron as a Neanderthal and wondering if he, too, would be sent a retraction demand:

[28] Candace Owens (@RealCandaceO), X (Jan. 11, 2025, at 13:41 ET), https://x.com/RealCandaceO/status/1878150320762548707.



99. On January 11, 2025, Defendants reposted on X the false assertion that the December Retraction Demand admitted that Mrs. Macron raped President Macron. This was blatantly false, and Owens knew it. The truth was that the December Retraction Demand pointedly denied that the President was statutorily raped.

100. On January 12, 2025, Defendants again reposted another claim that the December Retraction Demand admitted that Mrs. Macron raped President Macron and agreed it "was indeed the most stunning admission from the letter." Owens repeated this claim on Defendants' January 13, 2025 episode. Again, Owens knew these statements were false when she made them, but the truth did not matter when there were followers to be gained.

101. Owens' response to the December Retraction Demand was picked up by other media outlets, who understood from Owens that the Macrons had not provided any denials or evidence against her false claims, including that the Macrons

were lying about Mrs. Macron's biological sex, just as Owens intended.[29] Those same outlets described Owens as doubling down on all her claims.

102. Defendants prioritized profit over truth and used the December Retraction Demand as fuel for even more content. On January 13, 2025, Defendants posted on X that Owens was sharing her legal response to the Macrons—one that she had not yet sent to them.[30] In Defendants' January 13, 2025 episode, Owens promised to upload her entire response to her Locals page—yet again, she did not follow through.[31]

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[29] *Brigitte Macron was born a man: Candace Owens spreads crazy conspiracy theory about Emanuel Macron's wife*, Times of India (Jan. 13, 2025, at 20:09 IST), https://timesofindia.indiatimes.com/world/europe/brigitte-macron-was-born-a-man-candace-owens-spreads-crazy-conspiracy-theory-about-emanuel-macrons-wife/articleshowprint/117208515.cms; *French President Emmanuel Macron Says His Wife Does Not 'Owe' Candace Owens 'Proof' She Is and 'Always Has Been a Woman' in Stern Legal Letter*, OK! Magazine, (Jan. 10, 2025, at 18:33 ET), https://okmagazine.com/p/emmanuel-macron-legal-letter-wife-doesnt-owe-candace-owens-proof-woman/; Jenel Treza Albuquerque, *Candace Owens says Emmanuel Macron sent her a legal letter after she met a journalist who claimed Brigitte Macron was "born a man"*, Soap Central, (Jan. 12, 2025, at 18:54 ET), https://www.soapcentral.com/entertainment/news-candace-owens-says-emmanuel-macron-sent-legal-letter-met-journalist-claimed-brigitte-macron-born-man; *Candace Owens responds to Emmanuel Macron's legal threat after claiming his wife is transgender*, The Express Tribune, (Jan. 11, 2025), https://tribune.com.pk/story/2521484/candace-owens-responds-to-emmanuel-macrons-legal-threat-after-claiming-his-wife-is-transgender; *President Emmanuel Macron and Wife Brigitte Send Candace Owens Legal Threat Over 'Gender' Report as Far-Right Pundit Laughs it Off —'You're Not Above Critique'*, Radar, (Jan. 10, 2025, at 19:30 ET), https://radaronline.com/p/candace-owens-emmanuel-macron-brigitte-macron-transgender-allegations-letter-legal/.

[30] Candace Owens (@RealCandaceO), X (Jan. 13, 2025, at 15:24 ET), https://x.com/RealCandaceO/status/1878900942986432750.

[31] Video posted by Candace Owens (@RealCandaceO), YouTube, *I Respond To Mr. And Mr. Macron*, Candace Ep. 131 (Jan. 13, 2025), https://www.youtube.com/live/mQoVHeeynNA.

103. At that point, Owens decided to escalate her claims further. In that same episode, Owens falsely implied that the Macrons were responsible for the death of a journalist investigating them. Owens claimed that the Macrons have a "dark side" and "one by one, these independent journalists and researchers begin to suffer." Noting that "this is a true story," Owens told her audience about Isabella Ferreira, who was investigating the Macrons' relationship and "landed upon something bigger" and "two weeks later, this Isabella Ferreira is found dead." The authorities ruled Ferreira's death a suicide, but Owens claimed that was "almost impossible." The intended, unavoidable, and false implication is that Ferreira was killed for investigating the Macrons.

104. Owens repeated that the December Retraction Demand did not "deny that Brigitte is trans" or "explicitly state that Brigitte Macron was born a biological woman." This is false. The December Retraction Demand explicitly stated that the Macrons were not concealing Mrs. Macron's biological sex and that she was born Brigitte Trogneux, a woman.

105. Owens told the Macrons to "bring this lawsuit." She continued, "[d]on't even waste your money on getting a courier to file. I'll file it for you . . . I'll run down to the courthouse and file the lawsuit for you." Owens claimed, "I might even cover your legal expenses." Owens displayed her ill will toward the Macrons, stating, "I am disgusted by your relationship. You make me sick, Brigitte."

106. On January 16, 2025—several days after publicly referencing its contents—Owens finally sent a response to the December Retraction Demand to the Macrons' counsel. Rather than retract her demonstrably false statements, Owens defiantly reaffirmed them. She provided no evidence or justification to support her defamatory claims. Instead, she attempted to trivialize the matter by insisting that the Macrons reframe their denials as responses to 21 questions—an apparent effort to convert her baseless "investigation" into a publicity stunt. Owens then misled her audience by claiming that, because she had posed these questions, the Macrons could never prove actual malice.[32] She failed to disclose, however, that the Macrons had already addressed the substance of her questions within the December Retraction Demand.

Owens releases an eight-part series pushing the conspiracy, packed with false and defamatory claims she knows are blatantly false.

107. On January 31, 2025, Defendants premiered the Series. The Series began with an introductory episode, followed by six chapters, and concluded with an epilogue. Throughout the Series, Owens made the false and defamatory allegations that Mrs. Macron, born a man, stole another person's identity to become Brigitte; Mrs. Macron and President Macron are blood-relatives involved in incest;

[32] Video posted by Candace Owens (@RealCandaceO), YouTube, *OH SNAP! Justin Baldoni Is Now Suing Blake Lively and Ryan Reynolds PERSONALLY*, Candace Ep. 134 (Jan. 16, 2025), https://www.youtube.com/watch?v=gTiobOd9MAM.

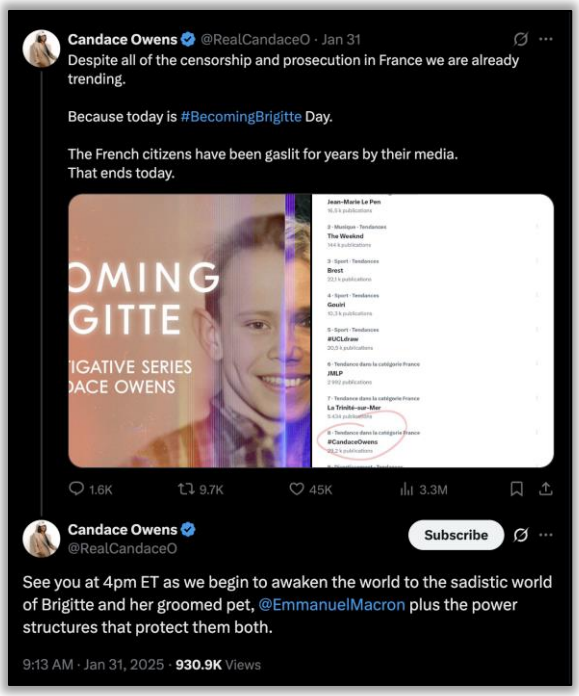
President Macron was chosen to be the President of France as part of MKUltra or a similar mind control program; and Mrs. Macron and President Macron are committing forgery, fraud, and abuses of power to cover up these "facts." These claims are demonstrably false, and Owens knew it when she published them.

An Introduction
January 31, 2025

108. The first installment, titled "An Introduction," premiered on January 31, 2025.[33] Defendants announced the introductory episode on X.[34] The episode can be found on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. A transcript is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

[33] Video posted by Candace Owens (@RealCandace), *Becoming Brigitte: An Introduction*, Candace (Jan. 31, 2025), https://www.youtube.com/watch?v=FDOnxpViQxY&list=PLPW2eH9z9CUvJ0Iiv9AQqq2RVAWFFfNZR&index=8.

[34] Candace Owens (@RealCandaceO), X (Jan. 31, 2025, at 09:13 ET), https://x.com/RealCandaceO/status/1885330518352318558.



109. Just before the premiere of the Introduction, Owens claimed that her website was attacked by a "state level actor" to prevent its publication.[35] The implication was that the Macrons were trying to prevent the Series from premiering. Owens told readers she would provide proof, but she never did.[36] Notwithstanding the lack of proof, Owens repeated these false claims.

110. Throughout the Introduction, Owens made the overarching false claim that the Macrons are surrounded by a syndicate of criminals that helps them conceal their secrets, which proves they themselves must be criminals. Owens made the following specific defamatory claims:

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[35] Candace Owens (@RealCandaceO), X (Jan. 31, 2025, at 14:50 ET), https://x.com/RealCandaceO/status/1885415439611711857.

[36] Candace Owens (@RealCandaceO), X (Jan. 31, 2025, at 15:03 ET), https://x.com/RealCandaceO/status/1885418774561522036.

- . . . Brigitte Macron's alleged brother who [] I believe Brigitte Macron is . . .

- And guys, by the way, you should know that there is this strange case of what happens to every journalist who tries to touch the story. First and foremost, uh, Isabella Ferreira. I think I mentioned this on a past episode. . . . People who began prodding into the story as an independent journalist happened upon some huge information pertaining to the relationship of Emmanuel Macron and Brigitte. Uh, but then she was found dead. She was found dead floating in a river and her friends said that she didn't kill herself, but the media said she most definitely did that.

- . . . there have been people who have been so concerned about like our safety and stuff. We did up on security for this time being after getting the letter from Macron and because of the things that we know about their network and, uh, things that are happening, like I said, to every journalist that has tried to get this out, we, um, are taking that seriously, but also know that at the end of the day, it's not in the security's hands. It is in God's hands. And so we just ask everybody, whether you believe or not, to just pray.

111. The Introduction set the tone for the Series and left no doubt that Owens intended to portray the Macrons as liars and criminals. She told viewers that the Macrons "are in fact lying to the public about Brigitte Macron's past identity," and they would not believe Mrs. Macron was a woman by the time the Series concluded. She promised her viewers that the Series would get more sensational as it went on, noting the Introduction was "the tip of the iceberg," and the Macrons are involved in "pedophilia, [] pederasty, [] incest, lies, and trying to thug people via courts."

112. Owens juxtaposed her claims of criminal activity alongside insinuations of foul play in the case of Isabella Ferreira to intentionally imply that the Macrons were involved in Ferreira's death—a baseless and defamatory

accusation. Owens bolstered and escalated the false claims with concern for her own safety and false accusations of the Macrons weaponizing state institutions to silence critics. Owens solidified her claims of abuses of power and criminal activity by stating that "Brigitte Macron and Emmanuel Macron come from a circle, a syndicate of real power, old power, old money power."

113. Owens painted herself as the victim for her morally superior efforts to "expose what's happening with Brigitte Macron." She claimed that she was the victim of defamation by the media, which is protecting "state criminals" such as the Macrons.

114. On February 3, 2025, after Owens escalated her claims in "An Introduction" and made good on her promise to release a series on the Macrons, the Macrons sent the February Retraction Demand, this time addressing Owens' latest false and defamatory allegations.

115. The Macrons told Owens that her insinuation that they were involved in the death of Ferreira was entirely false. Again, they told Owens that they had not engaged in any criminal behavior. And again, they told Owens that there was no secret group controlling or blackmailing them with evidence of Mrs. Macron being born a man.

116. Owens never wrote back but instead used the demand as content for her Series. Owens chose to publicly deliver her reply to the Macrons' February

Retraction Demand in the next episode of the Series rather than issue a direct reply to the Macrons—further evidence that she prioritized publicity over truth. Unsurprisingly, her response was to once again double-down on her knowingly false and defamatory claims.

Episode 1: Gaslighting The Public
February 4, 2025

117. On February 4, 2025, Defendants released the next episode of the Series titled "Episode 1: Gaslighting The Public."[37] Defendants announced the release of Episode 1 on X.[38] The episode can be found on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. A transcript is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

118. Episode 1 was premised on Owens' false claims that the Macrons have manipulated and controlled the media, even resorting to outright lies and fraud, to conceal their pasts and the nature of their relationship. During Episode 1, Owens made the following specific false and defamatory claims:

- I literally told you that every journalist that tries to touch this story, something happens to. Okay. And it is a fact that Isabella Ferreira was working on the story, had messaged according to her friends saying that she had a bombshell about Emmanuel Macron and appreciate the French press has reported on this. And then she was found dead floating in a river,

[37] Video posted by Candace Owens (@RealCandaceO), YouTube, *Becoming Brigitte: Gaslighting The Public | Ep 1* (Feb. 4, 2025), https://www.youtube.com/watch?v=xIbUXQ5c-oQ&list=PLPW2eH9z9CUvJ0Iiv9AQqq2RVAWFFfNZR&index=7.

[38] Candace Owens (@RealCandaceO), X (Feb. 4, 2025, at 15:58 ET), https://x.com/RealCandaceO/status/1886881989514375318.

okay. Or a pond, whatever it was. And they, the public said that she had drowned and her friends said that she was not suicidal. And the public, the press said that she had maybe taken some pills. I don't remember.

- Like I said, every journalist that tries to get this out. Yes, that is not a lie. That is the truth. We have upped our security because, and we were responding to the chat, people saying, get yourself some good security. And of course, when you have people walking around your property and you have young children and you understand the extent of the stakes that are in this, getting and upping on your security, that is my right.

- I believe Brigitte Macron was born a biological male, okay. And then transitioned into a female. That is my belief. I don't know how many times I can say it.

- . . . and you will never, ever, ever get me to transform my opinion that you were groomed by the person you eventually married in 2007, Brigitte Macron. I believe she's a man.

119. Owens began Episode 1 by doubling down on the claims she made in the Introduction episode about Ferreira and her own safety in response to the February Retraction Demand. Again, these statements unmistakably and intentionally implied criminal culpability on the part of the Macrons and are demonstrably false.

120. Owens supported these claims of violence and criminality with statements that the Macrons are surrounded by criminals, pedophiles, and an "extraordinary syndicate." She claimed that they purposefully hire employees who "will break you down" and use "tactics of blackmail and coercion."

121. These claims are false. The Macrons were not involved in the death of Ferreira, nor would they make any attempt to direct violence against Owens.

122. Turning to focus on the crux of her false theory, Owens detailed Mrs. Macron's life for viewers with an eye toward supporting her baseless claim that Mrs. Macron was born a man. Owens deliberately emphasized the word "allegedly" before recounting details of Mrs. Macron's life to indicate Owens' intent to debunk them. Again, Owens falsely claimed that the December Retraction Demand failed to address "whether or not Brigitte Macron was a man."

123. Owens attempted to bolster her false claim based on Mrs. Macron's clothing. Owens pointed out that Mrs. Macron is dressed by Nicolas Ghesquière, the artistic director of Louis Vuitton women's collections, whom Owens describes as "the main promoter of transgenderism and androgyny in the fashion world" and who "specializes in transgenderism." Owens suggested that this is evidence that Mrs. Macron must be transgender, ignoring the obvious truth that many women appreciate and wear Louis Vuitton. This manufactured meaning is a telling example of the quality of Owens' "evidence."

124. Most shockingly, Owens outright lied about the December Retraction Demand to support her false claims of statutory rape and pedophilia. Twisting facts to fit her preconceived narrative, Owens stated the December Retraction Demand was "an admission that it is statutory rape." This assertion is factually and legally incorrect and further republishes the false allegation of criminal conduct.

125. Owens told the Macrons that no amount of evidence will "ever get [her]

to transform [her] opinion" that President Macron was groomed by Mrs. Macron and that Mrs. Macron was born a man. This flatly refutes her claims that her goal is to inform her audience of the facts.

Episode 2: An Inaccessible Past
February 5, 2025

126. On February 5, 2025, Defendants released the next episode of the Series titled "Episode 2: An Inaccessible Past."[39] Defendants announced the episode on X.[40] The episode can be found on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. A transcript is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

127. Episode 2 was premised on Owens' false claims that both President and Mrs. Macron have intentionally made it impossible for the media to uncover their pasts, thereby hiding the secrets of their identities and relationship. During Episode 2, Owens made the following specific false and defamatory claim:

> He turned to his wife to know what to answer about his sister. I don't know about how you guys are feeling right now, but I'm starting to get a little icky feeling. It's all starting to feel a bit, I don't know, incestuous to me . . .

[39] Video posted by Candace Owens (@RealCandaceO), YouTube, *Becoming Brigitte: An Inaccessible Past | Ep 2*, (Feb. 5, 2025), https://www.youtube.com/watch?v=PTHrK1QviaI&list=PLPW2eH9z9CUvJ0Iiv9AQqq2RVAWFFfNZR&index=6.

[40] Candace Owens (@RealCandaceO), X (Feb. 5, 2025, at 13:29 ET), https://x.com/RealCandaceO/status/1887207022883717284.

128. In a calculated move to mislead viewers into thinking her false claims had multitudes of real evidence behind them, Owens began Episode 2 by telling her audience that she "did not even cover all of the pedophile stories" in Mrs. Macron's past.

129. Throughout Episode 2, Owens remained committed to her preconceived narrative that Mrs. Macron was born a man, interpreting all information as further confirmation. She again highlighted Mrs. Macron's clothing as evidence she transitioned, stating that she wore a lot of scarves as a teacher, and the only plausible explanation was that they were meant to hide signs of feminization surgery.

130. Owens based her theory that Mrs. Macron is her brother, Jean-Michel, on the family photo from her childhood. Owens stated that Mrs. Macron was not the child on the mother's lap, but really the young boy to the left. Owens bolstered this false claim with the equally false evidence that up until the release of the family photo, Jean-Michel was "completely unaccounted for" as a member of Mrs. Macron's family.

131. Owens reinforced her preconceived narrative by lying to her viewers about additional photos from Mrs. Macron's childhood. First, she told her audience that the biographical documentary *Brigitte Macron, un roman français* by Virginie Linhart only contained two photos from Mrs. Macron's childhood, when it contained

more. Second, Owens claimed she was presenting a collage "actually of all the photos" in the documentary, even though she knowingly omitted many images in the documentary. Third, moving the goalposts after being confronted with contradictory evidence, Owens walked back her claim that the first communion photo was "recolorized" but maintained it was still not of Mrs. Macron. Fourth, Owens falsely claimed that Mrs. Macron would not state she was in the first communion photo.

132. Towards the end of Episode 2, Owens turned her gaze towards President Macron to begin seeding her eventual claim that he is a product of MKUltra or a similar government mind control program. MKUltra was a secret CIA program that conducted human experiments to develop mind control techniques using drugs, psychological manipulation, and torture.

133. To encourage suspicion, Owens characterized President Macron's childhood as "a black hole" with very little information available. She suggested that his upbringing may be linked to a clandestine government plot because his father was a psychiatrist and his mother was a pediatrician. Owens referenced the book *Chaos*, about the CIA's MKUltra program, and told viewers that its contents were "relevant as we go along with this series, learning about some government programs, which involved a lot of psychiatrists . . . it all just kind of fits in." Through these statements, Owens promoted the false and defamatory insinuation that President

Macron's family background, childhood, and professional rise are not only suspicious but also orchestrated by covert mind control efforts.

134. This claim is demonstrably false. President Macron has neither participated in nor is he the product of any government mind control programs. There is no evidence to support this outlandish claim. Owens knew this claim was false when she made it.

135. Owens also introduced her false claim that the Macrons are committing incest. Specifically, she distorted President Macron's demeanor during a media interaction to claim, "It's all starting to feel a bit, I don't know, incestuous to me." Owens made it clear that this was a (false) fact by presenting a side-by-side image of Mrs. Macron's "supposed to be nephew," Jean-Jacques, and President Macron—in an effort to convince viewers of an apparent resemblance between the two. Jean-Jacques is the biological son of Mrs. Macron's brother, Jean-Michel Trogneux. Owens intentionally implied that the image was proof President and Mrs. Macron were blood relatives.

136. This claim is demonstrably false. The Macrons are not blood relatives. Owens knew this claim was baseless when she said it. The Macrons explicitly told her they were not blood relatives in the December Retraction Demand.

Episode 3: One Coincidence Too Many
February 7, 2025

137. On February 7, 2025, Defendants premiered the next episode of the

Series, titled "Episode 3: One Coincidence Too Many."[41] Defendants announced the episode on X.[42] The episode can be found on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. A transcript is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

138. Episode 3 was premised on Owens' false claims that any coincidences in the Macrons' lives should be viewed as evidence in support of her theory. Among other things, Owens discussed President Macron's relationship with his grandmother, his parents' professions, and Mrs. Macron's first husband, André-Louis. During Episode 3, Owens made the following specific false and defamatory claims:

- We showed you this side by side of current President Emmanuel Macron and a person who was supposed to be Brigitte's nephew, his wife's nephew. But these two people who are not supposed to be in any way related look way too much alike.

- There is no conspiracy here. The MKUltra was real. The government was obsessed with all of these different programs. Really, the main point of them trying to condition the brain, trying to brainwash people, sometimes through isolation, which it sounds like Emmanuel Macron spent a ton of time isolated throughout his childhood. I mean, he's acknowledging that he lived through books, and his friends are acknowledging, or should be friends are acknowledging that he was kind of a loner and on his own. So they would experiment psychologically through isolation, through drugs,

[41] Video posted by Candace Owens (@RealCandaceO), YouTube, *Becoming Brigitte: One Coincidence Too Many | Ep 3* (Feb. 7, 2025), https://www.youtube.com/watch?v=6Q3BNGd7htE&list=PLPW2eH9z9CUvJ0Iiv9AQqq2RVAWFFfNZR&index=5.

[42] Candace Owens (@RealCandaceO), X (Feb. 7, 2025, at 13:30 ET), https://x.com/RealCandaceO/status/1887932007713321053.

you know, LSD, drugging people to see if they could get them to commit crimes or to commit other acts unwittingly, essentially trying to establish a Manchurian candidate. . . . So we don't know just how global that program went. We don't know every element of that program. . . . And one element of that program was of course, sexual perversions, like committing a sexual assault in order to then establish how it impacts somebody's psyche. Truly evil stuff. Okay. Now earlier I told you that Macron's biological alleged biological parents you see here up on the screen had some interesting jobs just off the bat. His father, Jean-Michel Macron was a psychiatrist. And yes, of course we know for a fact that psychiatrists have done some evil things, some very evil things throughout the years.

- What really happened to André-Louis, who was cremated very quickly, even though his daughter says he was buried? . . . What really happened to André-Louis? . . . Did he actually die? Did he escape with the assistance of the Élysée Palace? Did he try to escape, but the Élysée Palace intervened?

139. Owens opened Episode 3 with one of her most outrageous fabrications: the incest claim. She displayed the side-by-side photo of President Macron and Brigitte Macron's nephew, telling her audience, "These two people who are not supposed to be in any way related look way too much alike." It was a clear and calculated attempt to convince viewers that the Macrons are blood relatives—and that they committed incest. Owens knew the claim was false, but it didn't matter. She recognized the power of exploiting her audience's conspiratorial thinking to boost attention, deepen loyalty, and drive profits.

140. She then pivoted to another familiar tactic: casting doubt on photos of Mrs. Macron to support her broader lie that the Macrons are hiding Brigitte's identity. This time, she targeted a wedding photo of Mrs. Macron and her late

husband, André-Louis Auzière, saying that the bride does not look like Mrs. Macron and asking, "Who is the person in this photo?" Owens posed the question despite acknowledging the existence of a marriage certificate confirming the wedding of Mrs. Macron and Mr. Auzière, and listing the best man as Mrs. Macron's brother, Jean-Michel.

141. Still, Owens kept pushing. She falsely claimed that Mrs. Macron had refused to confirm she was the woman in the wedding photo—even though the December Retraction Demand explicitly identified the woman as Mrs. Macron and noted the photo as one of many photos documenting her life as a woman.

142. With her audience growing, so did Owens' distortions. She cast suspicion on the death of André-Louis Auzière, calling the timing "remarkably convenient" and implying that the Macrons were lying about the circumstances. She asked whether he was cremated too quickly and floated the idea that either his death was faked, or he was silenced by the Élysée Palace. "Did he actually die?" she asked. "Did he escape with the assistance of the Élysée Palace? Did he try to escape, but the Élysée Palace intervened?"

143. Then came the next escalation: Owens invoked MKUltra. She claimed President Macron's grandmother died on April 13—a date she noted also marks Mrs. Macron's birthday and the start of the CIA's MKUltra program—suggesting the connection was not a coincidence but a conspiracy. She alleged that

President Macron was subjected to isolation as a child to become a "Manchurian candidate," and claimed the program included "sexual perversions" such as assault to "impact somebody's psyche."

144. Not stopping there, Owens went after President Macron's parents, implying that their professions were suspicious and asserting without evidence, "We know for a fact that psychiatrists have done some evil things." She capped off the tirade by dragging Jeffrey Epstein into the mix, saying, "There is an Epstein connection in this story. We just haven't gotten to it yet . . . It is all connected."

145. Owens folded President Macron's mother, Dr. Françoise Noguès, into her fabricated narrative by focusing on her professional work with intersex individuals. Owens twisted Dr. Noguès' role—providing medical care and support to intersex patients in France—into supposed proof that the Macron family was well-versed in identity "transformation" and, therefore, part of a coordinated effort to conceal Mrs. Macron's biological sex. The leap is illogical and baseless. There is no connection between Dr. Noguès' work and her daughter-in-law's identity. And Owens ignored the fundamental distinction between being intersex and being transgender. Still, without a shred of supporting evidence, Owens falsely claimed the Macrons "kept this quiet when they got married," deliberately misleading her audience to serve a narrative she knew was false.

Episode 4: Jean-Michel Trogneux
February 11, 2025

146. On February 11, 2025, Defendants released the next episode of the Series titled, "Episode 4: Jean-Michel Trogneux."[43] Defendants announced the episode on X.[44] The episode can be found on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. A transcript is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

147. Episode 4 was premised on Owens' false recount of Jean-Michel's life and "proof" that Mrs. Macron was, in fact, Jean-Michel. Owens intentionally released Episode 4 on Jean-Michel's birthday, saying, "Happy birthday Brigitte." During Episode 4, Owens made the following specific false and defamatory claims:

- Today is Jean-Michel Trogneux's birthday. In other words, happy birthday, Brigitte Macron, the First Lady, Brigitte Macron.
- . . . Macron's immediate family was involved in helping people who had gender issues to become someone else. In other words, they were facilitating the issuing of real government IDs, which allowed people to legally shed themselves of their former identities and their true biological sex. We have to wake up to the fact that that is the reality of the world that we live in today. So what are the implications of that?
- But what we can't tell you is what exactly happened to [André-Louis Auzière]. We cannot ascertain what happened to him based on the

[43] Video posted by Candace Owens (@RealCandaceO), YouTube, *Becoming Brigitte: Jean-Michel Trogneux | Ep 4* (Feb. 11, 2025), https://www.youtube.com/watch?v=yCkFQSceM2Y&list=PLPW2eH9z9CUvJ0Iiv9AQqq2RVAWFFfNZR&index=4.

[44] Candace Owens (@RealCandaceO), X (Feb. 11, 2025, 13:09 ET), https://x.com/RealCandaceO/status/1889376320758411562.

testimony of his first cousin, because it depends on whether or not you believe his partner, the woman who was at his funeral, who claimed that she found tickets to Africa in his pocket, that he had emptied all of his bank accounts. And if you potentially, or you could say, and, or if you believe the journalist from Paris Match, who then wrote that André actually spent the last days of his life in a psychiatric ward being guarded by none other than Alexander Benalla.

- With forgery, extortion, and most importantly, with access to a woman who can facilitate the changing of identities, it is not enough for any person investigating this case to ask questions like, is this Brigitte Trogneux in the wedding photo?

- Because we can confirm that that is indeed a photo of a woman named Brigitte Trogneux in that wedding photo where that Brigitte is. We cannot confirm because the first lady refuses to answer. She has a mother-in-law who helps transgender people get new identities. So you have to essentially understand that you can just take somebody's name. You can take, you can become somebody else at a moment's notice. Now, legally, when you become transgender, okay. This brings us to Jean-Michel Trogneux.

- If it's really you, Brigitte Macron, and you didn't take on the identity of your sister, if it's really you . . .

- The only question that remains is who the hell is Brigitte Macron? And the obvious answer to me, and after you see these photos that you are going to see, one in particular, from when Jean-Michel Trogneux was 18, you're going to fall down like I did when I saw it. It's completely crazy.

- There's no question upon seeing this technology, in my mind, that Jean-Michel Trogneux is Brigitte Macron. The only question that I have is what happened to his sister, Brigitte Trogneux.

148. Owens opened Episode 4 with her central, baseless narrative of identity theft. She declared, "Today is Jean-Michel Trogneux's birthday. In other words, Happy Birthday Brigitte Macron," signaling to her audience that Mrs. Macron and her brother are the same person. She then teased an "explosive"

photo of Jean-Michel to prove this claim but refused to show it. Owens questioned, "Who the hell is Brigitte Macron?" before asserting that the "obvious answer" is Jean-Michel Trogneux. Owens continued, "there's no question . . . that Jean-Michel Trogneux is Brigitte Macron. The only question that I have is what happened to his sister, Brigitte Trogneux." She promised viewers more evidence about what happened to the "real" Brigitte Trogneux, but it never came.

149. To further amplify her identity theft claims, Owens concocted a theory that Mrs. Macron gave an interview under the name "Véronique," an openly transgender individual, in 1977. Owens said the voice was "exactly" the same as Mrs. Macron's according to an AI voice analysis. But Owens admitted she "doesn't know much about these softwares" and provided no evidence that the analysis exists. Owens used this interview to bolster her claim that Jean-Michel transitioned to Mrs. Macron because Jean-Michel was married to a woman named Véronique. Owens described the marriage as only "on paper," implying that it was a front for his transition.

150. To make this claim, not only did Owens ignore publicly available videos and photos of Jean-Michel, including from President Macron's inauguration, but she also ignored facts from her own source. In his book, Poussard admitted the man seen at the inauguration is named Jean-Michel and lives above the Trogneux family shop in Amiens. Owens does not inform her audience of this fact because it

entirely debunks her false narrative.

151. Owens insisted that if Mrs. Macron "didn't take on the identity of [her] sister," she would have answered basic questions—ignoring that those answers were in the December Retraction Demand.

152. Owens closed Episode 4 by continuing to build her false mind-control narrative, citing the book *Chaos* about the Charles Manson murders and the CIA. She claimed these topics are "very relevant" to President Macron's story, reinforcing her defamatory suggestion that his identity and career are products of covert psychological manipulation.

153. Displaying her true motive, Owens justified a request for donations with claims that she is risking her safety "to protect children" from "predatory" people like the Macrons.

Episode 5: Who Created Emmanuel Jean-Michel Macron?
February 13, 2025

154. On February 13, 2025, Defendants premiered the next episode of the Series titled "Episode 5: Who Created Emmanuel Jean-Michel Macron?"[45] Defendants announced the episode on X.[46] The episode can be found on

[45] Video posted by Candace Owens (@RealCandaceO), YouTube, *Becoming Brigitte: Who Created Emmanuel Jean-Michel Macron? | Ep 5* (Feb. 13, 2025), https://www.youtube.com/watch?v=xAiShYLJi5k&list=PLPW2eH9z9CUvJ0Iiv9AQqq2RVAWFFfNZR&index=3.

[46] Candace Owens (@RealCandaceO), X (Feb. 13, 2025, at 15:25 ET), https://x.com/RealCandaceO/status/1890135320332804466.

CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. A transcript is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

155. Episode 5 is premised on Owens' false and defamatory claim that Emmanuel Macron was specially selected and groomed to be the leader of France so that an unknown secret group of elites could control him. During Episode 5, Owens made the following specific false and defamatory claims:

- This is a good time to tell you that most of what you think you even know about Emmanuel Macron thus far, his legacy. Yeah, it's just objectively not true. Emmanuel had a major hand up in life. This guy [is] so private, we don't know much about him. What we do know about him is I would say quite sinister. It's quite sinister. It's making me think, I don't know, of that movie, *The Manchurian Candidate*.

- Brigitte Macron perhaps is Jean-Michel Trogneux.

- Who are you really, and what is your relationship to Emmanuel Macron? What is Emmanuel Macron's relationship to you? What is the relationship between Emmanuel Macron and Jean-Jacques? It's not feeling like a nephew to me.

- He's just a puppet. And he has been groomed from that time that he was a child, but groomed by who, who is his father? Who is his father? . . . he doesn't really seem to have close relations with his parents of these, his doctors, perhaps . . . they can change identities and they can change names. This family has this capacity.

- There are too many similarities between the upbringing of []Emmanuel Macron and as we talked about the upbringing of Kamala Harris, the upbringing of Barack Obama, you know, these people being raised by their grandparents at a time when we know that the MKUltra program was running and there is something very, very wrong there.

156. In Episode 5, Owens doubled down on her most outrageous lies,

painting the Macrons as criminal masterminds propping up a false identity with forged photos and a fabricated past. She opened by claiming the images the public sees "can't be trusted" because they were supposedly manufactured by a French public relations consultant, Mimi Marchand—who, Owens insisted, has "an extensive criminal history," has been accused of "many a forgery, many an extortion," and is "in a lot of trouble right now."

157. Owens embraced the false theory that President Macron is a modern "Manchurian candidate," handpicked and groomed by shadowy elites. Owens stated, "Most of what you think you know about Emmanuel Macron . . . it's just objectively not true," and suggested that his entire life was staged for this role. Speaking directly to him, she said, "You know how to act and pretend that you are the president . . . clearly somebody behind you has been moving you all through life."

158. She tied this alleged grooming to the Rothschild family, a prominent Jewish banking family with historic influence in European finance, which has long been the target of antisemitic conspiracy theories and harmful tropes. She told viewers she would not say much about the Rothschilds "so the episode doesn't get hit on YouTube," but suggested they look up "proven ties to Jeffrey Epstein" and scandals involving "pedophilia and incest" surrounding them.

159. Owens portrayed President Macron as a puppet "groomed from the time

that he was a child," questioning his family ties: "Who is his father? . . . he doesn't really seem to have close relations with his parents or these, his doctors, perhaps . . . they can change identities, and they can change names." She framed his entire biography as part of a global operation steeped in "perversion and pedophilia and grooming." Drawing false parallels with other leaders, she claimed there were "too many similarities between the upbringing of Emmanuel Macron and . . . Kamala Harris, [and] Barack Obama," all supposedly raised during the era of MKUltra mind-control experiments.

160. Owens capped it off by escalating her incest narrative, turning directly to Mrs. Macron: "Who sanctioned these lies in the press? What is Emmanuel Macron's relationship to you? What is the relationship between Emmanuel Macron and Jean-Jacques? It's not feeling like a nephew to me." She then flatly lied: "They won't answer that." In truth, the Macrons unequivocally denied the incest claim in their December Retraction Demand.

Episode 6: Candace Owens x Xavier Poussard
February 17, 2025

161. On February 17, 2025, Defendants launched Episode 6 of the Series, titled "Candace Owens x Xavier Poussard."[47] Defendants announced the episode on

[47] Candace: *Becoming Brigitte: Candace Owens x Xavier Poussard | Ep 6* (CandaceOwens.com, Feb. 17, 2025), https://candaceowens.com/video/becoming-brigitte-candace-owens-x-xavier-poussard-ep-6/.

X.[48] The first twenty minutes of the episode are available on YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, but the remainder is exclusively accessible on CandaceOwens.com, allowing Owens to avoid other platforms' content moderation policies. A transcript of the first 20 minutes is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

162. Episode 6 features an interview by Owens of Poussard, her primary source. Despite knowing that Poussard walked Rey and Roy into defamation liability in France, Owens decided to air Poussard's false claims, not once but twice, to a global audience and expand on them. Owens told the world she was releasing Episode 6 because the Macrons sent her a retraction demand—proving her motive is revenge, not the truth.

163. During Episode 6, Owens made the following specific false and defamatory claim:

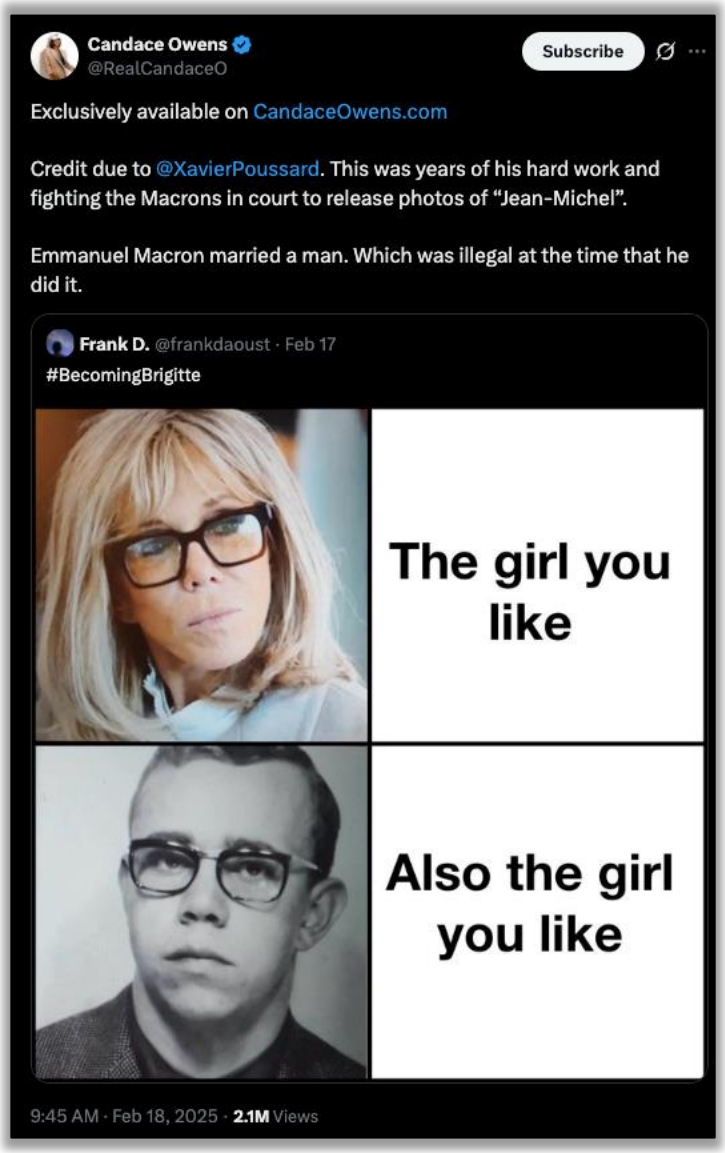
> I think a year from now, most of the world will be awakened to the fact that what I said one year ago is true. I believe that Emmanuel Macron is a homosexual man that was groomed from his youth. I believe the individual who groomed him is now his wife. I believe that his wife was born Jean-Michel Trogneux and transitioned in his early thirties, and I believe that the entire state is colluding to protect that secret. And like I said, I would stake my entire professional career on all of those points.

164. Defendants published several false and defamatory X posts in support

[48] Candace Owens (@RealCandaceO), X (Feb. 17, 2025, at 12:56 ET), https://x.com/RealCandaceO/status/1891547191736475866.

of Episode 6. In those X posts, Owens made the following specific false and defamatory claims:

- Emmanuel Macron married a man. Which was illegal at the time that he did it.[49]



- Why did he send me the legal letter? 1) Because Brigitte can STILL be prosecuted for this crime against a minor up until the end of this year. 2) Because his marriage was an illegal act. Emmanuel Macron broke the law

[49] Candace Owens (@RealCandaceO), X (Feb. 18, 2025, at 9:45 ET), https://x.com/RealCandaceO/status/1891861509975703647.

when he married his groomer.[50]

165. In Episode 6, Owens and Poussard laid out their full conspiracy theory, anchoring their defamatory claims with manufactured evidence. They alleged, without a credible basis, that Mrs. Macron is actually Jean-Michel, born male, who later committed incest with President Macron—who himself, they claim, is a product of a mind-control program and a "Manchurian candidate." They further asserted

[50] Candace Owens (@RealCandaceO), X (Feb. 18, 2025, at 9:47 ET), https://x.com/RealCandaceO/status/1891862093575462960.

that the Macrons conspired to manipulate the media, falsify records, and use state power to suppress the truth. Owens presented this narrative as fact, not opinion, despite knowing its utter falsity.

166. To bolster these outrageous claims, Owens and Poussard obsessed over Mrs. Macron's childhood photos, asserting—without proof—that images were doctored to hide her "true" identity. Poussard claimed a young Jean-Michel was airbrushed out of the family photo, though neither he nor Owens pointed to a single source. Owens dismissed the 2021 Daily Mail debunking article by saying she did not need to understand the theory about Mrs. Macron's biological sex; she could "just see" Mrs. Macron was actually Jean-Michel. When confronted with the first communion photo, which undermines her theory, Owens shrugged off reality, claiming it was "too modern" and had simply been colorized to look older—an assertion she previously contradicted after receiving the December Retraction Demand. Owens further downplayed the wedding photo, claiming it was not of Mrs. Macron without providing an alternative explanation. Her confidence is based not on facts but on a determination to stick to a false but sensational narrative.

167. While discrediting the publicly available photos disproving their thesis, Owens and Poussard alluded to other photos that support their claims without showing them to the audience. Poussard claimed to possess photos that would "prove" Mrs. Macron is Jean-Michel and that the real Brigitte no longer exists—but

he never produced them. They similarly claimed that Jean-Michel is not the man from the inauguration video but never provided their proof or an alternative explanation.

168. Owens asked, "Where is the real Brigitte Trogneux today?" They concocted a fiction that Jean-Michel assumed his sister's identity in 1986 and married President Macron under this false persona, committing "identity theft." Unsurprisingly, despite admitting she "actually existed," neither Owens nor Poussard explained what happened to the "real Brigitte Trogneux."

169. Owens then escalated the rhetoric to claim that France is "run by a deranged homosexual with his child victim," accusing Mrs. Macron of criminal conduct and suggesting that President Macron is the abused child. She pushed further by suggesting that the Macrons are related by blood and committing incest, based on perceived facial resemblances between President Macron and Mrs. Macron's nephew, Jean-Jacques, whom Poussard falsely claimed may be Mrs. Macron's child.

170. Owens and Poussard agreed that there is a secret group of criminal elites controlling President Macron. Poussard stated, "It's time we ask ourselves the question . . . are these young leaders being engineered and controlled by blackmail?" Owens endorsed this claim, telling her audience: "I do think, and this is rather conclusively, that the world is sort of waking up to this concept that leaders are

selected and primed and groomed and sort of inserted into powerful positions." She linked this theory directly to Mrs. Macron, concluding: "This is kind of the same thing with Brigitte Macron." Poussard noted that the Macrons' marriage is fraudulent and that France has "placed in power a couple whose entire identity is based upon a fraudulent construct, forgery, pedophilia, and the abuse of a minor."

171. To explain why this "dark family secret" has remained secret thus far, Owens and Poussard accused the Macrons of abusing the French Secret Service and judiciary to silence critics. Owens even asked whether Poussard fears for his life—suggesting that the Macrons are willing to kill to protect their "fraudulent construct."

The Epilogue
February 20, 2025

172. Defendants released the last episode of the Series, titled "The Epilogue," on February 20, 2025.[51] During the epilogue, Owens told her listeners that in all the previous episodes, she had "stuck strictly to the facts." Defendants announced the episode on X.[52] The episode can be found on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. A transcript is available on YouTube, Spotify, Apple Podcasts, and PodScribe.

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[51] Video posted by Candace Owens (@RealCandaceO), YouTube, *Becoming Brigitte: The Epilogue* (Feb. 20, 2025), https://www.youtube.com/watch?v=Yu1_dhNvLHg&list=PLPW2eH9z9CUvJ0Iiv9AQqq2RVAWFFfNZR&index=1.

[52] Candace Owens (@RealCandaceO), X (Feb. 20, 2025, at 16:00 ET), https://x.com/RealCandaceO/status/1892680741172941033.

173. The Epilogue is premised on Owens' false and defamatory claim that a family member molested President Macron, and that President and Mrs. Macron are committing incest. Owens linked these false and defamatory claims of molestation and incest with equally false claims that the Rothschild, Trogneux, and Macron families are intertwined blood relatives. During the Epilogue, Owens made the following specific false and defamatory claims:

- I know there are so many lingering questions. Is Brigitte Macron, the first lady of France, Emmanuel Macron's biological father? We're hearing that a lot. Where is the real Brigitte Trogneux?

- Okay, so many of you had suspected that these families might all be related. Are the Auzières, the Trogneux, and the Macrons all just from the same family? Is there a chance that Brigitte Macron some of you asked is actually the father of Emmanuel Macron?

- We definitely know and have confirmed like we did in the last episode that he had his hand held through his career by uh, David de Rothschild. A family that is known and is on record as having practiced incest. Okay, why and how did Emmanuel Macron get so close to the Rothschilds? So close that his colleague said this dude didn't even know what EBITDA meant and yet he became the youngest managing partner. We understood that whatever it was David Rothschild was holding his hand. He just couldn't question the power that he was being given and we would laugh at him in meetings because he knew nothing about finance. Why did David Rothschild see to it that Emmanuel had his hand held? Vice is nice, but incest is best because it stays in the family. That is a direct quote from David de Rothschild's cousin Natalie Reams Rothschild . . . . Then there was a biography which was written by author Natalie Livingston, which was entitled "The Women of Rothschild," which sort of revealed the maniacal desire that the Rothschild family had to maintain their fortune and their power in the world. A desire that was so maniacal that they practiced family incest. That is just undeniable. It is a fact. Okay, and allegedly they did this only until it was no longer socially acceptable. Right up until the late 19th century, you guys, right before we get into this

this Trogneux family. It's just amazing. . . .

- Yes, I agree with those of you that are commenting right now that we are looking potentially at incest. That is, that is what in my guts feels it has to be a secret so big that it would make them react in this way because it is a type of violence to treat journalists like this. It is a [] kind of emotional violence to do these sorts of things and they do it as though they know that vice is nice, but incest is best and things should be kept within the family.

174. Defendants published a false and defamatory X post in support of the Epilogue, in which Owens made the following specific false and defamatory claims:[53]

- Is Brigitte Macron [President Macron's] father?
- What happened to the real Brigitte?

175. In the Epilogue, Owens explicitly accused Mrs. Macron of an "identity

[53] *Id.*

swap," falsely claiming that the Élysée Palace refused to confirm recent photos of Jean-Michel Trogneux as the same person pictured in a 1953 family photo from Amiens. This is demonstrably false—the Macrons explicitly confirmed his identity in their December Retraction Demand, a section Owens herself read aloud in Episode 1. Later, while reviewing the inauguration footage, Owens repeated that "they won't answer [] for sure" whether the man shown is Mrs. Macron's brother, ignoring that the Macrons had already provided her with the footage and stills, affirming it is Jean-Michel.

176. She bolstered the identity theft claims by stating the family "could destroy identities and create identities," using shared names to "make it very easy [] to move throughout the family and share identifications." Owens urged viewers to come forward with any information about the "mystery" of Brigitte Trogneux's whereabouts—asking whether she was given a different name or died young after having children.

177. Yet again, Owens raised incest claims precisely because she knew how outrageous and sensational the claims were. She deliberately appealed to prurient interests to draw attention and boost her audience, exploiting shock value to keep viewers engaged. Owens asserted a "key takeaway" from the Series was that Mrs. Macron may be President Macron's father. She speculated that the Rothschild and Trogneux families are connected, explaining President Macron's promotion at

Rothschild Bank, and concluded—without basis—that "we are looking potentially at incest." To reinforce this, she claimed Jean-Jacques Trogneux "looks almost identical to Emmanuel Macron," again implying a hidden family relationship.

178. She declared the Series will remain free "because how could you talk about a story that involves incest and children and the criminal activities of government . . . and put it behind a paywall." Owens promoted Poussard's *Becoming Brigitte* book as containing "way more pedo-criminals" than the Series, indicating to her audience that she has even more evidence against the Macrons—if only they buy the book.

179. Owens took her final jab at President Macron, accusing him of lying about his origins, claiming, "They're not actually his mom and dad." Yet again, she cited his parents' professions—a psychiatrist father and a pediatrician mother—as evidence of deliberate identity manipulation, again pushing the false narrative that President Macron's entire life is staged.

180. Owens ended with a direct, inflammatory call for President Macron's removal: "Emmanuel Macron, you have lied repeatedly to the French people. You have harassed journalists. You are a monster and not a monster of your own doing. You were targeted when you were a child . . . and what you have done is unforgivable as a leader." She dismissed his authority: "It's just ridiculous to pretend that he has any power; whatever shadow is behind you, fly it over so they

can have a conversation with President Trump." Owens concluded, "We know you were created. You are not real. You have no thoughts of your own. You are the Manchurian candidate, and you have absolutely no power." She tied this alleged manipulation back to Mrs. Macron, accusing her of grooming President Macron into a "psychopathic" figure who "enjoyed harming people."

The Macrons send a final retraction demand, putting Defendants on notice of the false and defamatory claims in the Series.

181. Even after the Series concluded, Owens continued to exploit the Macrons for content. As detailed below, she repeated her claims in interviews with other podcasters. She insisted that Mrs. Macron was a man whenever the Macrons appeared in the news. She publicized President Trump's request for her to stop spreading the rumors and falsely claimed that President Macron refused to help end the war in Ukraine until Owens stopped speaking about Mrs. Macron. She falsely tied President Macron to Jeffrey Epstein. Owens was relentless.

182. On July 1, 2025, the Macrons sent the July Retraction Demand, this time addressing the false and defamatory statements from the Series.

183. The July Retraction Demand referenced and incorporated the December and February Retraction Demands and explicitly stated that "Mrs. Macron has always been a woman; she is not President Macron's blood relative; and President Macron was not involved in a mind control program." Furthermore, it stated that these truths completely invalidate Owens' false claims.

184. Yet again, rather than retracting her claims (or simply refraining from commenting), Owens decided to use the July Retraction Demand for content.[54] Owens lied to her audience and stated that the Macrons had never told her they were not blood relatives. She then read her audience the list of false and defamatory statements included in the appendix to the July Retraction Demand. Next, Defendants published the July Retraction Demand and its attached appendix to CandaceOwens.com.

185. Owens made her refusal to retract clear, stating, "We are not getting in line. We've said, 'File your lawsuits, my friend.'"

186. Owens then claimed the July Retraction Demand was the result of the Macrons' "law firm just running up the tab and taking their money and lying to them about what defamation means in America, lying to them . . . maybe it is that law firm being sleazy and running up the tab."

187. The Macrons never received a direct response to the July Retraction Demand.

Defendants published Owens' false and defamatory claims with actual malice—that is, with the knowledge that they were false or with reckless disregard for the truth.

188. Owens published her false and defamatory statements in the Series with

[54] Video posted by Candace Owens (@RealCandaceO), YouTube, *DOUBLE SERVED! Blake Lively And Brigitte Macron.* (Jul. 2, 2025), https://www.youtube.com/watch?v=03DPN8u9mHw.

actual knowledge that they were false or, at a minimum, with reckless disregard for their falsity and of the truth. Indeed, there is substantial evidence that, at an absolute minimum, Owens recklessly disregarded the truth in publishing the defamatory statements.

189. Most egregiously, prior to the release of the Series, the December Retraction Demand squarely addressed the central defamatory themes Owens intended to publish, providing clear, documented evidence that refuted those falsehoods. Rather than engaging with the facts in good faith, Owens willfully ignored the substance of the letter. Instead, she selectively quoted isolated phrases out of context, misleading her viewers by falsely suggesting that these excerpts constituted the entirety of the Macrons' response. Most importantly, Owens informed her audience that the Macrons had not denied any of her allegations—a demonstrable and deliberate lie intended to bolster the credibility of her preconceived narrative. Her conduct reveals not only a reckless disregard for the truth but also a calculated attempt to deceive her audience and defame the Macrons.

190. Even setting aside the multiple retraction demands, there is overwhelming evidence of actual malice. Owens' central claim—that President and Mrs. Macron fabricated their identities, engaged in incest, participated in MKUltra, and are part of a criminal syndicate engaged in identity theft, forgery, fraud, abuses of power, and even murder—is inherently implausible on its face. She relied on

fringe conspiracy theorists and discredited figures as her primary sources while disregarding readily available public records and credible reporting that directly contradicted her narrative. Her refusal to engage with contradictory facts and her deliberate elevation of fabrications over truth demonstrate a reckless disregard for the truth.

191. Owens' repetition, promotion, and endorsement of an inherently improbable conspiracy theory is evidence of actual malice. Although the indisputable facts all point to the conclusion that President and Mrs. Macron have not lied about their identities or history, Owens remains dead set on creating a media circus to build her viewership and wealth by hawking false, inherently improbable, and defamatory claims about the Macrons including identity theft, incest, and mind control, deeply damaging the Macrons' reputations.

192. Owens' sources are facially unreliable. It is baffling that Owens would "stake [her] entire professional reputation" on the word of a so-called clairvoyant (Roy) and amateur detective (Rey). Worse still, Owens chose to repeat and republish their accusations despite Rey and Roy having been found liable for defamation by a French court regarding those very claims. Furthermore, relying on Xavier Poussard—the prior writer for *Faits et Documents*, a newsletter known for its anti-Semitism and conspiracy theories—further discredits these facially ridiculous accusations.

193. Not only are Rey and Roy facially unreliable, but they also display ill will toward the Macrons. Indeed, Rey attempted to influence French policy with these claims, as she stated to Roy that her evidence of the First Lady's transition was in "a sealed envelope deposited with a lawyer whose name is well known" and would be made public "the day vaccines are made obligatory."

194. Roy is biased against President Macron due to an incident where she claims she was not well-treated during a call to the Élysée Palace. This incident allegedly occurred just after President Macron's 2017 election. Roy contacted the palace after experiencing a premonition that terror groups were going to attack a French nuclear power station but was disbelieved for obvious reasons. Indeed, this is not the first unfounded rumor about the Macrons Roy has spread on her YouTube channel. She has often falsely claimed that President Macron is gay, as well as other rumors about the Macrons' private lives.

195. Owens' political bias against President and Mrs. Macron was evident during her July 1, 2024 episode of *Candace*, when she stated she does not "know how long Brigitte Macron is going to be leading the country behind her husband" because "Marine Le Pen's far-right group" was expected to win, which Owens found "extremely promising." Owens further claimed, "Macron has no power . . . Brigitte has been running the show." This political bias, too, is circumstantial evidence of Owens' actual malice, especially where she has read and ignored reliable sources

debunking these falsehoods.

196. Owens has openly demonstrated her ill-will and retaliatory intent toward the Macrons, further evidencing actual malice. In interviews with multiple podcasters, Owens admitted that she initially intended to release only a single episode of the Series. However, upon receiving the December Retraction Demand—which directly refuted her false claims—Owens responded not by reassessing the accuracy of her reporting, but by escalating her defamatory campaign. She stated, "Now we're doing a whole series because how dare you," making clear that the Series was motivated by personal animus rather than any legitimate journalistic purpose. She further warned that if the Macrons were to contact her again regarding her false accusations, she would retaliate by producing a second season. These statements reflect a deliberate intent to harm, not a good-faith effort to report the truth.

197. Owens intentionally disregarded key sources that have forcefully, publicly, and repeatedly debunked her dubious claims. Owens admitted that she reviewed reliable sources debunking the conspiracy—indeed, Owens learned about the allegation from the 2021 Daily Mail debunking article. That article provided substantial evidence of the probable falsity of the allegations. Owens also received three retraction demand letters from the Macrons, which explicitly stated that her claims were false and included evidence to support this. Owens' intentional

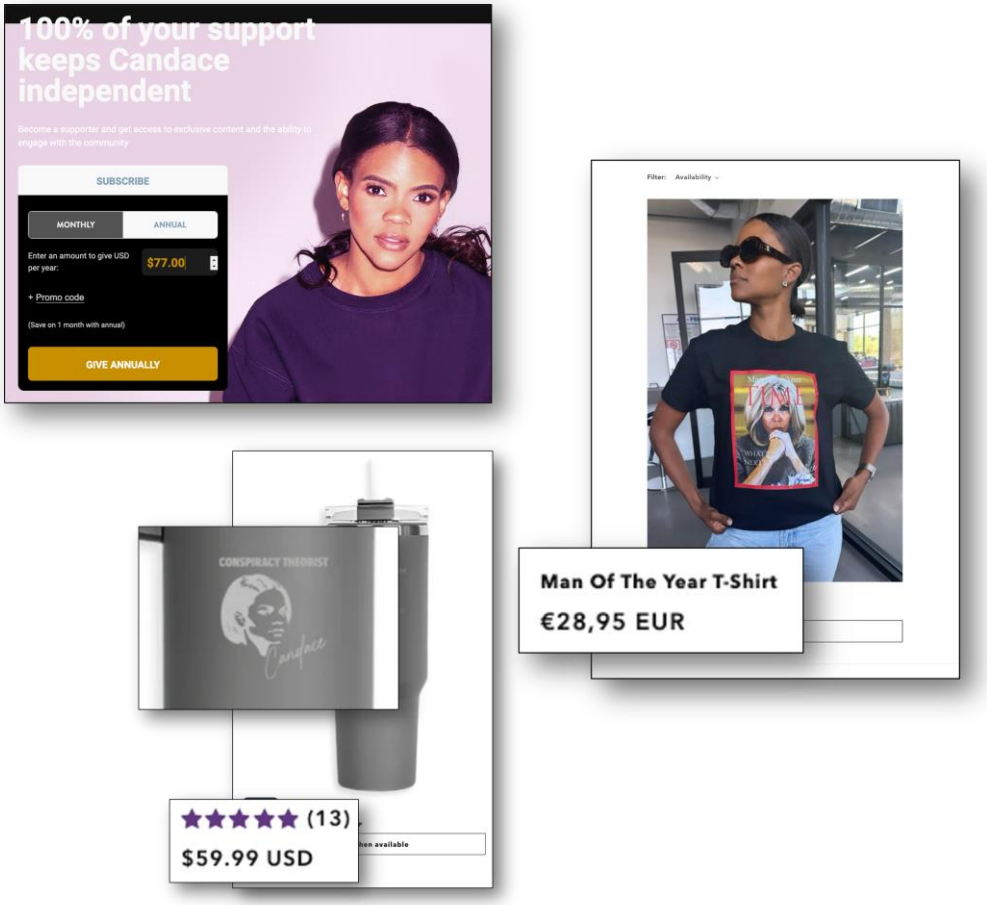
disregard of these sources in favor of her preconceived narrative is evidence of actual malice.

198. There is no doubt that Owens had a preconceived storyline before she began her reporting. In March 2024, she told the world she was staking her entire reputation on Mrs. Macron being a man. Owens made these false accusations because they supported that preconceived storyline, despite the inherent improbability of her accusations and the unreliability of her sources (made even more ludicrous when compared to the credibility of the sources debunking her assertions). This is evident in Owens' refusal to provide her audience with evidence that contradicts her claims and her knowingly false denial that such evidence exists.

199. Owens was also financially motivated to create a scandal. The Series was aggressively monetized and used to solicit donations, promote subscriptions, and elevate her personal brand. Her conduct reveals a clear motive to generate controversy for financial and reputational gain; she will say anything, regardless of how outrageous or unfounded, to attract attention, build her platform, and achieve notoriety.

200. After being fired from The Daily Wire, Owens needed to produce the kind of sensational content that would ignite her followers to contribute financially. Currently, Owens' show appears to rely heavily on funding from audiences and advertisers supportive of her false claims about the Macrons. Owens has tricked

fans into believing she is on a righteous mission rather than a merely profitable one. As evidenced by the merchandise she sells on CandaceOwens.com, she has monetized the "conspiracy theorist" label and profited from her lies about the Macrons:



201. In Owens' September 18, 2024 appearance on *Piers Morgan Uncensored*, she flatly admitted that she relies on fan donations to keep her podcast up-and-running since being demonetized by YouTube. A week earlier, she had claimed in her September 11, 2024 X post that YouTube demonetized her account because she was exposing the global ring of Satanic pedophiles—currently through

the Macron conspiracy theory. In reality, YouTube had demonetized Owens' account for violating its hate speech policies.

202. Owens' financial motives for publishing the Series are clear because she repeatedly solicited donations in every episode. Although YouTube has monetized her channel once again, she has publicly stated that her goal is to become financially independent from the platform. To that end, Defendants have rebuilt Owens' website to host content that she knows would be removed or demonetized under YouTube's content moderation policies—indeed, one episode of the Series is dubbed "Too Hot for Youtube!" on Owens's website.

203. In every episode of the Series, Owens asks her audience to support her work financially. She pairs these requests with assertions that she is engaged in a mission to reveal the truth and that efforts to hold her accountable are part of a broader attempt to suppress free speech and religion. Owens characterizes criticism and fact-checking of her claims as censorship and attacks on her religious beliefs. These appeals reinforce her false narrative and encourage her audience to financially support her despite the lack of credible evidence to substantiate the defamatory claims she promotes. Her financial incentive and motive to make the defamatory accusations further prove actual malice.

204. Taken together, Owens' deliberate misrepresentation and manufacturing of evidence, the inherent improbability of her accusations, her

reliance on facially unreliable sources, her bias and ill-will, her intentional disregard of reliable sources, her preconceived storyline, her financial incentive, and her refusal to retract in the face of contradictory evidence are clear and convincing evidence of actual malice.

Others amplified and republished Owens' false and defamatory statements, increasing their global audience and the reputational and emotional harm to the Macrons.

205. Owens continued promoting her false claims after the conclusion of the Series. On February 21, 2025, Owens again accused Mrs. Macron of lying about her identity and grooming President Macron. Then, egging on the Macrons, Owens said, "Where's your lawsuit? Where's your lawsuit, Brigitte? When are you going to drop it?"[55]

206. Owens' false claims were picked up by other influential podcasters after the conclusion of the Series. This included Joe Rogan, who is widely accepted as the most popular podcaster in the world. Currently, his podcast, *Joe Rogan Experience*, has over 20 million subscribers on YouTube. It is also available on Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. Rogan has 19.9 million followers on Instagram and 15.4 million followers on X. *Joe Rogan Experience* was ranked the number one podcast in the United States as of Q4 2024,

[55] Video posted by Candace Owens (@RealCandaceO), YouTube, *EXCLUSIVE: Taylor Swift Will Be Deposed. | Candace Ep 150* (Feb. 21, 2025), https://www.youtube.com/watch?v=wpTaKI_oUWc.

according to Edison Research.

207. On March 22, 2025, Rogan discussed the Series on the *Joe Rogan Experience*.[56] Rogan said, "Macron's a man. Yeah, Brigitte Macron's a man. [Owens] got me hook, line, and sinker." The March 22 episode has more than 720,000 views.

208. On April 3, 2025, Rogan discussed Owens' popularity on YouTube.[57] Rogan stated, "Candace Owens' show, it's on YouTube . . . it's doing better numbers than any of the shows on cable news. It's phenomenal. . . . She can't be stopped." Rogan highlighted the Series, stating, "She's got a six-hour presentation on how Brigitte Macron is a man . . . I think she's right." In support of that claim, Rogan stated, "[Owens] would be getting sued right now instead of trying to bribe her. Instead of trying to give her money to shut the fuck up, they would sue her."

209. The Macrons have never offered Owens any type of bribe or money settlement to stop speaking about them.

210. Owens endorsed and repeated Rogan's statements by playing the clip from his April 3 episode on the April 7 episode of *Candace*.[58] Owens stated, "He is

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[56] Video posted by Joe Rogan Experience (@joerogan), YouTube, *JRE Fight Companion* (Mar. 22, 2025), https://www.youtube.com/watch?v=Xr-DqSmJEXI.

[57] Video posted by Joe Rogan Experience (@joerogan), YouTube, *Dave Smith #2299* (Apr. 3, 2025), https://www.youtube.com/watch?v=EmNE6yNxruc&t=1037s.

[58] Candace Owens, *Russell Brand Charged | Ryan Reynolds Caught | Ep 172*, Candace, Apr. 7, 2025, https://www.youtube.com/watch?v=VakslzWRcvk.

the biggest podcaster in the world." Owens did not refute the false claim that the Macrons tried to bribe her. Instead, she said, "He is not lying. There is so much that's happening in France right now that I actually said to my team, 'We are going to have to do a *Becoming Brigitte* season two.' The updates that we have in that case, what has come out since, and once again, the things that the mainstream media are completely neglecting to cover." Owens continued, "I have some stories to tell you that I have had to keep my mouth shut about. I really want to tell you guys, and I really am going to tell you eventually, but I'm thinking we're going to have to do a season two of *Becoming Brigitte*."

211. On February 19, 2025, comedians Tom Segura and Christina Pazsitzky discussed Owens on their podcast *Your Mom's House*.[59] *Your Mom's House* has 2.13 million subscribers on YouTube and 130,000 followers on X. Segura has 685,000 subscribers on YouTube and 967,000 followers on X. Pazsitzky has 222,000 subscribers on YouTube and 265,400 followers on X. *Your Mom's House* is available on YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. The February 19 episode has garnered over 500,000 views, and the March 5 episode has surpassed 400,000 views on YouTube alone.

212. Pazsitzky stated the Series is "huge" and Owens has "a ton of

[59] Video posted by YMH Studios (@YMHStudios), YouTube, *Tom's DMT Voyage Ep. 798, Your Mom's House* (Feb. 19, 2025), https://www.youtube.com/watch?v=IWkYo1VBUuw.

evidence." Pazsitzky repeated that Owens is "staking her career on the fact that Brigitte Macron . . . the First Lady of France, is actually a man." Pazsitzky repeated the false claim that Mrs. Macron is actually Jean-Michel.

213. When Segura asked why this is important, Pazsitsky summed up Owens' overarching theory that "It's not just that this woman is a man . . . The implications for this being (a) if this really is a man who transitioned to a woman is because having a relationship with a 14-year-old boy is completely inappropriate and illegal and wrong. Secondly, . . . in the government, they're protecting [pedophiles] because they you know, she believes that this is a [pedophile] culture and they're protecting [pedophiles]. There's also links to the Rothschild family. Brigitte Macron is actually a Rothschild, which is like the biggest banking company in France I know, and they're protecting each other's interests. There's incest. There's all kinds of gross things. Satanic cults."

214. In a subsequent episode on March 5, 2025, Segura and Pazsitsky discussed Owens' pivotal role in making the false claims about the Macrons global.[60] Segura said Owens "is the leader in this story." Pazsitsky agreed, saying, "This is Candace Owens' big moment right now. She has exposed Brigitte Macron." Pazsitsky repeated the false claim that the Macrons are "not even trying to call

[60] Video posted YMH Studios (@YMHStudios), YouTube, *The High and Tight 800th Episode Ep. 800, Your Mom's House* (Mar. 5, 2025), https://www.youtube.com/watch?v=43K9WrmPF7U.

[Owens] out on [the false claims]."

215. On March 5, 2025, Owens appeared on *This Past Weekend with Theo Von* to discuss the Series.[61] Theo Von is a popular comedian and podcaster. He has over 4 million subscribers on YouTube, 1.5 million followers on X, and 8 million followers on Instagram. Von's podcast is available on YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. As of Q4 2024, it was ranked number five in the United States, according to Edison Research. His episode with Owens has 3.4 million views on YouTube alone.

216. In her discussion with Von, Owens claimed that "1000%, [Mrs. Macron] was born a man, lived as a man for 30 years, and then transitioned at some time in the 80s." Von asked Owens whether she was concerned about being sued for her statements, and she replied, "I have welcomed the lawsuit . . . I only presented the facts." In the same clip, Owens falsely stated that President Macron was 14 and Mrs. Macron was 40 when the couple met, and "they don't deny that"—something Owens has repeatedly recognized the Macrons do refute.

217. On March 14, 2025, Tucker Carlson hosted Clayton Morris on *The*

[61] Video posted by Theo Von, *Candace Owens Ep. 566, This Past Weekend with Theo Von* (Mar. 5, 2025), https://www.youtube.com/watch?v=wlHJTDBmZAs.

Tucker Carlson Show.[62] The Tucker Carlson Network (TCN) is a streaming platform launched by Tucker Carlson in December 2023, following his departure from Fox News. TCN broadcasts Carlson's podcast *The Tucker Carlson Show*, which can be viewed on Carlson's website, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. Tucker Carlson has 4.02 million subscribers on YouTube, 16.3 million followers on X, and 4.5 million followers on Instagram. His episode with Morris has 1 million views on YouTube alone.

218. During the episode, Morris gave Owens "full credit . . . for really opening this story up from the French journalists who first broke it." Morris summarized Owens' reporting on Mrs. Macron, stating, "he's a groomer. . . . Emmanuel Macron was a child, and this man takes him under his wing and is a groomer, uses the identity of another human being. . . . Brigitte Macron is a man who groomed Emmanuel Macron." Morris went on to discuss the "mechanism protecting these people" involved in child sex trafficking and stated that "when you have people like Brigitte Macron, who are like groomers of children, it makes sense that they would be protected." Carlson agreed "these elite circles, it's incredibly disgusting."

[62] Video posted by Tucker Carlson (@TuckerCarlson), YouTube, *Clayton Morris: Truth About the USS Liberty, Europe's Self-Destruction, & Is Brigitte Macron a Man?* (Mar. 14, 2025), https://www.youtube.com/watch?v=N2tzUhrW8e0&t=22s.

219. Owens reported on Carlson's coverage of her claims.[63] She played a clip of Carlson and Morris discussing the Series, fully endorsing and repeating their statements, stating, "That's a fact." Owens noted that the Series was going "viral worldwide" and that "The entire world who has watched this series [is] embracing it."

220. In that same episode, Owens said, "I was only going to do one episode on Brigitte. And I went, met with Xavier Poussard, and did that interview with him, I was only going to do one episode. And then my pregnant butt waddled outside, and there was a hundred-page legal letter being served to me. And I was like, game on, let's go to war." Owens told her audience, "When I bring something to you, I hope you have enough trust to know that I would never just say stuff like I wouldn't just say stuff. . . . I don't just say stuff. And that's why I staked my entire professional career on the *Becoming Brigitte* series."

221. On April 3, 2025, Owens discussed President Macron with Ian Carroll, who hosts the *Ian Carroll Show* on YouTube, on an episode of *Candace*.[64] Ian Carroll has 316,000 subscribers on YouTube, 1.2 million followers on X, 653,000

[63] Video posted by Candace Owens (@RealCandaceO), YouTube, *Straight Husbands vs Ryan Reynolds | Tucker Carlson vs Brigitte Macron | Ep 161* (Mar. 17, 2025), https://www.youtube.com/watch?v=zZNTC9qrh2U.

[64] Candace Owens, *Candace Owens x Ian Carroll | Ep 171*, Candace, Apr. 3, 2025, https://www.youtube.com/watch?v=O0DrdlUck1E.

followers on Instagram, and 1.7 million followers on TikTok. Carroll's April 3 appearance on *Candace* has more than 1.3 million views. Owens stated, "Emmanuel Macron was an actor. He had no power. Anybody who has watched my Brigitte Macron series walks away and understands that he has never been in control."

222. On April 7, 2025, Owens appeared on *Keeping It Real with Jillian Michaels*, saying she "only stuck to the facts" on the Series.[65] Jillian Michaels is a popular reality star and podcaster. Michaels has more than 1.5 million followers on Instagram and 1.6 million followers on X. Her podcast has over 550,000 subscribers on YouTube. It is also available on Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. Michaels' April 7 episode with Owens has over 352,000 views.

223. On the podcast with Michaels, Owens boasted that Joe Rogan was "fully convinced" of her claims after two episodes. Owens then repeated her claims to Michaels, starting by exaggerating the Macrons' age difference, saying President Macron was a 14-year-old boy and Mrs. Macron was a 45-year-old woman. Owens then described her claims, saying "[Mrs. Macron's] just a dude. She transitioned when she was in her early thirties, became a teacher, got the Adam's apple surgery, met Macron; I mean, everything they told you about this, this woman was just fictitious, and it was made up because she's connected to a tremendous amount of

[65] Video posted by Keeping it Real with Jillian Michaels (@JillianMichaels), YouTube, *Candace Owens: Raw & Relentless!!* (Apr. 7, 2025), https://www.youtube.com/watch?v=83KhSS19LnU.

power in France." Owens repeated that Mrs. Macron took on "somebody else's identity." Owens then stated President Macron was 14 and Mrs. Macron was 40, contradicting her earlier false claim, stating "it's statutory rape . . . until the end of this year. Brigitte Macron could be tried for this. And this is why they're, they're freaking out. They're arresting journalists, are doing all this stuff. 'Cause it's true."

224. Owens told Michaels that she decided to punish the Macrons for their December Retraction Demand, saying, "I was only going to do one episode, and I said, 'Now we're doing a whole series because how dare you.'" Owens discussed the immense popularity of the Series and called it "the most viral thing we've ever done."

225. Owens leaned into the implication that the Macrons might try to physically harm her for her false claims in an exchange where Michaels stated, "I'm a little worried about you. Are you worried about you?" Owens stated, "I know . . . I just let God worry about me . . . my husband and I have just dedicated ourselves to the truth." Michaels replied, "I appreciate your faith in God, but maybe a really good security service." Owens stated, ". . . I think it's an act of vanity, security. I mean, like, they shot JFK in a moving vehicle . . . if they want you, they're gonna get you, you know, they're gonna get you."

226. On April 7, 2025, Owens also appeared on the *Howie Mandel Does*

Stuff podcast and spoke about Mrs. Macron.[66] Howie Mandel is a Canadian comedian, actor, and television personality. He hosted the game show *Deal or No Deal* and has been a judge on *America's Got Talent* since 2010. Mandel's podcast *Howie Mandel Does Stuff* has more than 286,000 subscribers on YouTube. It is also available on Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. Mandel has 1.2 million followers on Instagram and over 747,000 followers on X. Mandel hosts the podcast with his daughter and co-host, Jackelyn Shultz. Shultz has 104,000 followers on Instagram. The April 7 episode with Owens has more than 430,000 views.

227. Owens responded "100%" when asked if Mrs. Macron had a penis. Owens again boasted that Rogan was convinced of her claims about Mrs. Macron after two episodes of the Series. Owens repeated that Mrs. Macron lived as Jean-Michel before she transitioned and that there are only two photos from her past.

228. Mandel asked, "Did you get offered money, really?" Owens responded, "I got threatened first." Owens falsely claimed that she "hadn't done anything" and "it hadn't even come out" before the Macrons sent the December Retraction Demand. Mandel pressed Owens on whether she was actually offered money, and she begrudgingly admitted she was not. Owens said again that "it was only supposed

[66] Video posted by Howie Mandel Does Stuff (@HowieMandelDoesStuff), YouTube, *Candace Owens Reveals Truths on Russell Brand, Harvey Weinstein & Taylor Swift* (Apr. 7, 2025), https://www.youtube.com/watch?v=pU1ismsKwGw&t=4404s.

to be one episode, then when I got this 100-page letter, I said, 'now we're doing a whole series.'"

229. Owens then explained her central thesis to Mandel's audience, stating, "At the heart of the Macron thing . . . there's an entire pedophile nebula that's around him. . . . People who have worked for him that just keep getting arrested for child pedophilia. . . . Every Élysée Palace scandal regarding pedophilia that's happened since he's been in office, something's not right there." Owens then again falsely stated that "Macron was 14 years old; Brigitte was 40."

230. On April 26, 2025, Owens appeared on *The Tim Dillion Show*.[67] Tim Dillon is an American stand-up comedian, podcaster, and actor. His podcast, *The Tim Dillion Show*, has more than 847,000 subscribers on YouTube. It is also available on Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music. Dillion has over 878,500 followers on X and over 926,000 followers on Instagram. His April 26 episode with Owens has surpassed 1.5 million views.

231. Tim Dillion started the show by telling Owens that he was asked about the Series while checking into a hotel and said it has "blown up." Owens replied, "Oh, everywhere. I mean, it is the most international thing I've ever done." Owens again displayed her ill-will and bias against the Macrons, stating,

[67] Video posted by The Tim Dillon Show (@TimDillonShow), YouTube, *Candace Owens Emergency Podcast | #441* (Apr. 26, 2025), https://www.youtube.com/watch?v=dBZBVNVo754.

> The funny thing is, if Emmanuel Macron had not sent me that letter threat, we were only going to do one episode. Oh, my God. It's like I was so angry. He had the audacity to send a server processor to Nashville, Tennessee. And I'm, you know, I'm a little testy when I'm pregnant. I'll give you that, you know, but someone is going to knock on my front door and say, 'The President of France says you're not allowed to speak, or else.' So, yeah, it's a challenge. I was like, okay, like now we're really doing this thing. I already knew he married a dude, you know, but now we're really doing this thing.

To give credence to her false reporting, Owens continued, "And we just poured hours and hours and hours into just more research, tacking it on."

232. Owens again lied that the Macrons never provided her with evidence that her claims were false. She said, "In order to reach that actual malice standard, you have to show that we acted in reckless disregard for the truth. You refuse to say the truth. And it was just this pompous 100 page, 'We don't have to answer whether or not like Brigitte is a woman or a man.'" As Owens knew, the December Retraction Demand did, in fact, deny and disprove that Mrs. Macron was a man.

233. Owens pretended to have additional evidence to prove her false claims, stating, "And it's so much crazier because there's stuff that I can't say on record just yet. I'll tell you off camera, but it's gotten even crazier."

234. Owens again lied about the age difference between the Macrons, saying, "he's 14; [Mrs. Macron is] 40." Soon after, Owens went even further, saying it's actually "48 and 14." Dillion responded, "it's illegal." Owens repeated that Mrs. Macron engaged in identity theft.

235. Owens further demonstrated her ill-will toward the Macrons, stating,

> Their lawyers are still calling my lawyers. They still asked for us to take down the series because they were afraid when Joe Rogan mentioned it recently. So they made another phone call and were basically like, you know, we could still sue you in the future, but maybe you just want to take it down. . . . Stop with these phone calls. As I said to my lawyer, if they call again, we're doing a season two. Because I left a lot on the table.

236. Dillion discussed MKUltra and similar programs, with Owens describing them as "mind control programs that were in America. They were all over the place. And these were programs that were utilized to turn, um, you know, people into, um, essentially slaves that could be programmed to do things, whether it was assassinate someone and not remember why or who told you to do it. Right. Or be a sex slave. Or perhaps in a Manchurian candidate fashion, run the government, run a country." Owens responded, "that is who Emmanuel Macron is." Owens supported this with false claims that President Macron's test scores were faked, that he did not perform well at Rothschild Bank, and that "he was like [a] protected Rothschild and they needed to kind of create this fake resume for him to make people think he was a genius." Owens said "this is what a Manchurian candidate would look like. These people tend to always be in drama classes."

237. Owens repeated her theory that Mrs. Macron is not only a man who molested President Macron but also his blood relative. She stated, "My sense is [Mrs. Macron is] the missing uncle whose name is Jean-Michel . . . who was the

godfather when Emmanuel Macron got his first communion at school, who's just missing."

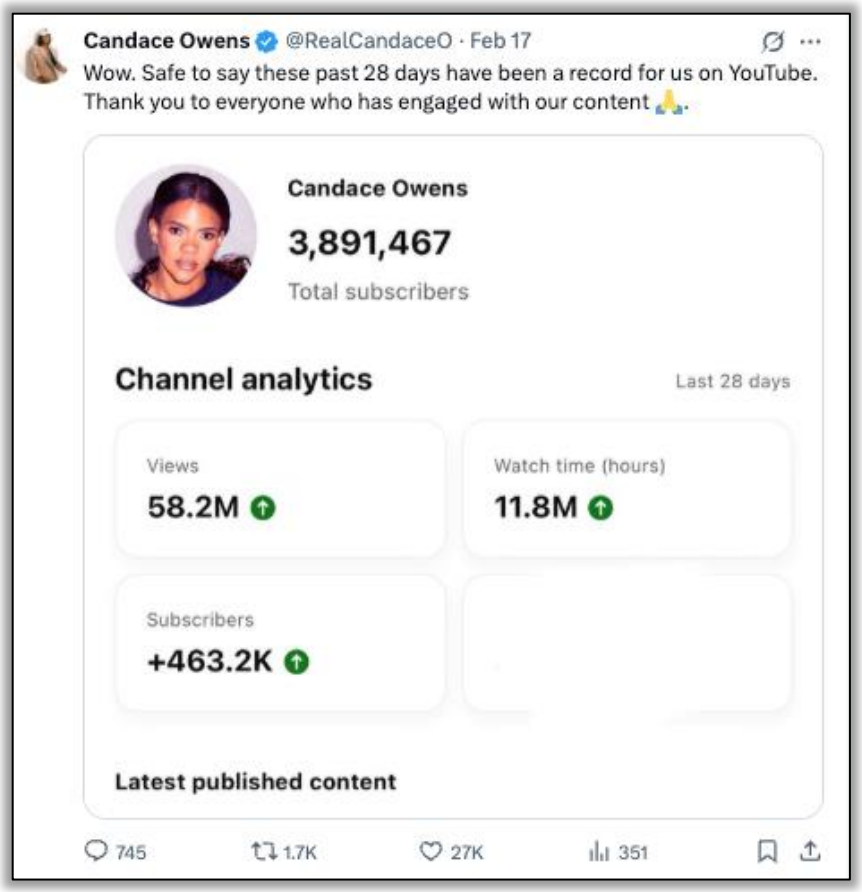
238. Dillon summed up Owens' claims, stating, "So it's your it's your belief that you've got Emmanuel Macron who goes through this program. He's selected at a very young age to basically be some type of Manchurian candidate. And then at some point, Jean-Michel Trogneux becomes Brigitte, who then becomes a teacher." Owens responded, "Yeah. To further groom. He was groomed by Brigitte, there's no question."

Owens' false statements and their reasonably foreseeable republication have harmed the Macrons' reputations.

239. Owens' false and defamatory accusations and implications have caused—and continue to cause—substantial and irreparable damage to the Macrons.

240. Owens' defamatory accusations and implications were widely circulated. Indeed, on February 17, 2025, Defendants posted the level of engagement they had on YouTube—calling it a "record for us"—largely due to the Series.[68]

[68] Candace Owens (@RealCandaceO), X (Feb. 17, 2025, at 12:30 ET), https://x.com/RealCandaceO/status/1891540778695950406.



241. Owens boasted about the widespread reach of the Series. In Defendants' March 17 episode, Owens stated, "now look at the series [*Becoming Brigitte*] everywhere. And the implications are, they're far-reaching. I want you guys to be clear. ***This is not just viral in France, viral in America, viral in the UK, the story, it's even viral in Russia. People are now considering it as a part of their political dialogue and analyses***, judging Emmanuel Macron's current actions . . . Because the world is finding out about the person who groomed him."

242. As discussed above, the Series and its defamatory accusations have been recirculated by other media outlets and podcasters, reaching a massive global

audience. The reputational harm to the Macrons is demonstrated by, among other things, numerous republications of Owens' false claims that have repeated and echoed Defendants' false and defamatory accusations—thereby showing that the people who heard and read Defendants' false and defamatory statements about the Macrons believe them.

243. Defendants' defamatory accusations caused numerous individuals who heard or read them—both those who had held the Macrons in high regard and those who otherwise would have, as well as those with no awareness or opinion of the Macrons—to view them with contempt, to hold them in low regard, and to avoid associating or doing business with them, and to encourage others to avoid associating or doing business with them as well.

244. The Macrons have publicly discussed the emotional harm they have suffered as a result of the conspiracy theories. At an International Women's Day event in Paris in February 2024, President Macron told reporters that "[t]he worst thing is the false information and fabricated scenarios. People eventually believe them and disturb you, even in your intimacy." Defendants—by amplifying these conspiracies on a global scale, and by purveying even more intimate, and even more heinous theories of their own—have greatly exacerbated that harm.

245. As a result of the false and defamatory accusations and implications published by Defendants, the Macrons' reputations have been impugned.

246. As a result of the false and defamatory accusations and implications published by Defendants, the Macrons' relationships with other members of the government, potential political allies, and others have been undermined.

247. As a result of the false and defamatory accusations and implications published by the Defendants, confidence in the Macrons' integrity and fitness as political and governmental leaders has been undermined.

248. In view of the foregoing, the Macrons are entitled to actual, presumed, and punitive damages in an amount to be specifically determined at trial.

COUNT ONE – DEFAMATION
INTRODUCTION EPISODE (JANUARY 31, 2025)

249. Plaintiffs repeat and allege paragraphs 1–248 as if set forth fully herein.

250. Defendants published the following false and defamatory statements of fact on January 31, 2025, during the Introduction episode of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) . . . Brigitte Macron's alleged brother who [] I believe Brigitte Macron is . . .

(b) And guys, by the way, you should know that there is this strange case of what happens to every journalist who tries to touch the story. First and foremost, uh, Isabella Ferreira. I think I mentioned this on a past episode. . . . People who began prodding into the story as an

independent journalist happened upon some huge information pertaining to the relationship of Emmanuel Macron and Brigitte. Uh, but then she was found dead. She was found dead floating in a river and her friends said that she didn't kill herself, but the media said she most definitely did that.

(c) . . . there have been people who have been so concerned about like our safety and stuff. We did up on security for this time being after getting the letter from Macron and because of the things that we know about their network and, uh, things that are happening, like I said, to every journalist that has tried to get this out, we, um, are taking that seriously, but also know that at the end of the day, it's not in the security's hands. It is in God's hands. And so we just ask everybody, whether you believe or not, to just pray.

251. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

252. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron has engaged in identity theft, has lied about her identity, and has perpetrated or directed physical violence against any individual for investigating or reporting on her, including Owens and Isabella Ferreira.

253. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux; she has never lied about her identity; and she has never perpetrated or directed physical violence against any individual for investigating or reporting on her and President Macron, including Owens or Isabella Ferreira.

254. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that President and Mrs. Macron have lied about Mrs. Macron's identity and have perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens and Isabella Ferreira.

255. The Statements are categorically and demonstrably false. President and Mrs. Macron have not lied about Mrs. Macron's identity and have not perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

256. The Statements are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying to the public about Mrs. Macron's identity, perpetrating abuses of power, and engaging in physical violence toward individuals investigating them.

257. The Statements are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and

Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

258. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Statements, which is readily apparent, and, in fact, intended to cause injury to President and Mrs. Macron by making the Statements.

259. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about Mrs. Macron's identity, perpetrated abuses of power, and engaged in physical violence toward individuals investigating them;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

260. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

261. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

262. As a direct and proximate result of Defendants' false Statements President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

263. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

264. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT TWO – FALSE LIGHT
INTRODUCTION EPISODE (JANUARY 31, 2025)

265. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

266. Defendants published the following false statements of fact on January 31, 2025, during the Introduction episode of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) . . . Brigitte Macron's alleged brother who [] I believe Brigitte Macron is . . .

(b) And guys, by the way, you should know that there is this strange case of what happens to every journalist who tries to touch the story. First and foremost, uh, Isabella Ferreira. I think I mentioned this on a past episode. . . . People who began prodding into the story as an independent journalist happened upon some huge information pertaining to the relationship of Emmanuel Macron and Brigitte. Uh, but then she was found dead. She was found dead floating in a river and her friends said that she didn't kill herself, but the media said she most definitely did that.

(c) . . . there have been people who have been so concerned about like our safety and stuff. We did up on security for this time being after getting the letter from Macron and because of the things that we know about their network and, uh, things that are happening, like I said, to every journalist that has tried to get this out, we, um, are taking that seriously, but also know that at the end of the day, it's not in the security's hands. It is in God's hands. And so we just ask everybody, whether you believe or not, to just pray.

267. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

268. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron has engaged in identity theft, lied about her identity, and has perpetrated or directed physical violence against any individual for investigating or reporting on her, including Owens and Isabella Ferreira.

269. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux; she has never lied about her identity; and she has never perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

270. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that President and Mrs. Macron have lied about Mrs. Macron's identity and have perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens and Isabella Ferreira.

271. The Statements are categorically and demonstrably false. President and Mrs. Macron have not lied about Mrs. Macron's identity and have not perpetrated or

directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

272. By publishing the Statements, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

273. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying to the public about Mrs. Macron's identity, perpetrating abuses of power, and engaging in physical violence against individuals investigating them.

274. Defendants knew the Statements would create a false impression about President and Mrs. Macron and intended to cause injury to President and Mrs. Macron by making the Statements.

275. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about Mrs. Macron's identity, perpetrated abuses of power, and engaged in physical violence against individuals investigating them;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

276. Defendants had no applicable privilege or legal authorization to publish the Statements and resulting false impression, or, if they did, they abused that privilege or authorization.

277. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

278. As a direct and proximate result of Defendants' Statements and

resulting false impression, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

279. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

280. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT THREE – DEFAMATION BY IMPLICATION INTRODUCTION EPISODE (JANUARY 31, 2025)

281. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

282. Defendants published the following false and defamatory statements of fact on January 31, 2025, during the Introduction episode of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) And guys, by the way, you should know that there is this strange case of what happens to every journalist who tries to touch the story. First and foremost, uh, Isabella Ferreira. I think I mentioned this on a past episode. . . . People who began prodding into the story as an independent journalist happened upon some huge information pertaining to the relationship of Emmanuel Macron and Brigitte. Uh, but then she was found dead. She was found dead floating in a river and her friends said that she didn't kill herself, but the media said she most definitely did that.

(b) . . . there have been people who have been so concerned about like our safety and stuff. We did up on security for this time being after getting the letter from Macron and because of the things that we know about their network and, uh, things that are happening, like I said, to every journalist that has tried to get this out, we, um, are taking that seriously, but also know that at the end of the day, it's not in the security's hands. It is in God's hands. And so we just ask everybody, whether you believe or not, to just pray.

283. Defendants juxtaposed the Statements to imply a false and defamatory connection between them or otherwise create the false and defamatory implications that President and Mrs. Macron have lied about Mrs. Macron's identity and have perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens and Isabella Ferreira (the **"Implications"**).

284. The Implications are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Implications (and the Statements giving rise to them).

285. The Implications are statements of (false) fact and are reasonably understood as factual—specifically, as assertions that Mrs. Macron has engaged in

identity theft, lied about her identity, and has perpetrated or directed physical violence against any individual for investigating or reporting on her, including Owens and Isabella Ferreira.

286. The Implications are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux; she has never lied about her identity; and she has never perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

287. Additionally, the Implications are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron lied about Mrs. Macron's identity and perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens and Isabella Ferreira.

288. The Implications are categorically and demonstrably false. President and Mrs. Macron have not lied about Mrs. Macron's identity and have not perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

289. The Implications are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and

Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying to the public about Mrs. Macron's identity, perpetrating abuses of power, and engaging in physical violence against individuals investigating them.

290. The Implications are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

291. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Implications, which is readily apparent and, in fact, intended to cause injury to President and Mrs. Macron by making the Implications.

292. For the reasons set forth in detail above, Defendants made the defamatory Implications with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Implications despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Implications as part of a preconceived narrative that President and Mrs. Macron have lied to the public about Mrs. Macron's identity, perpetrated abuses of power, and engaged in physical violence against individuals investigating them;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Implications for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Implications even after being confronted with additional evidence of their falsity.

293. Defendants had no applicable privilege or legal authorization to publish the Implications, or, if they did, they abused that privilege or authorization.

294. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

295. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs

incurred in hiring legal counsel to clear their name in the court of public opinion.

296. Defendants published the Implications maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

297. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT FOUR – DEFAMATION EPISODE 1 (FEBRUARY 4, 2025)

298. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

299. Defendants published the following false and defamatory statements of fact on February 4, 2025 during Episode 1 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) I literally told you that every journalist that tries to touch this story, something happens to. Okay. And it is a fact that Isabella Ferreira was working on the story, had messaged according to her friends saying that she had a bombshell about Emmanuel Macron and appreciate the French press has reported on this. And then she was found dead floating in a river, okay. Or a pond, whatever it was. And they, the public, said that she had drowned and her friends said

that she was not suicidal. And the public, the press said that she had maybe taken some pills. I don't remember.

(b) Like I said, every journalist that tries to get this out. Yes, that is not a lie. That is the truth. We have upped our security because, and we were responding to the chat, people saying, get yourself some good security. And of course, when you have people walking around your property and you have young children and you understand the extent of the stakes that are in this, getting and upping on your security, that is my right.

(c) I believe Brigitte Macron was born a biological male, okay. And then transitioned into a female. That is my belief. I don't know how many times I can say it.

(d) . . . and you will never, ever, ever get me to transform my opinion that you were groomed by the person you eventually married in 2007, Brigitte Macron. I believe she's a man.

300. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

301. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron has engaged in identity theft, lied about her identity, and perpetrated or directed physical violence against individuals investigating or reporting on President Macron or herself, including Owens or Isabella Ferreira.

302. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux; has not lied about her identity; and has not perpetrated or directed physical violence against any individual for investigating

or reporting on President Macron or herself, including Owens or Isabella Ferreira.

303. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that President and Mrs. Macron have lied about Mrs. Macron's identity and perpetrated or directed physical violence against individuals investigating or reporting on them, including Owens or Isabella Ferreira.

304. The Statements are categorically and demonstrably false. President and Mrs. Macron have not lied about Mrs. Macron's identity or perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

305. The Statements are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace, and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying to the public about Mrs. Macron's identity, perpetrating abuses of power, and engaging in physical violence against individuals who are investigating them.

306. The Statements are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic

evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

307. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Statements, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Statements.

308. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about Mrs. Macron's identity, perpetrated abuses of power, and engaged in physical violence against individuals investigating them;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

309. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

310. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

311. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

312. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

313. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT FIVE – FALSE LIGHT
EPISODE 1 (FEBRUARY 4, 2025)

314. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

315. Defendants published the following false and defamatory statements of fact on February 4, 2025 during Episode 1 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) I literally told you that every journalist that tries to touch this story, something happens to. Okay. And it is a fact that Isabella Ferreira was working on the story, had messaged according to her friends saying that she had a bombshell about Emmanuel Macron and appreciate the French press has reported on this. And then she was found dead floating in a river, okay. Or a pond, whatever it was. And they, the public, said that she had drowned and her friends said that she was not suicidal. And the public, the press said that she had maybe taken some pills. I don't remember.

(b) Like I said, every journalist that tries to get this out. Yes, that is not a lie. That is the truth. We have upped our security because, and we were responding to the chat, people saying, get yourself some good security. And of course, when you have people walking around your property and you have young children and you understand the extent of the stakes that are in this, getting and upping on your security, that is my right.

(c) I believe Brigitte Macron was born a biological male, okay. And then transitioned into a female. That is my belief. I don't know how many times I can say it.

(d) . . . and you will never, ever, ever get me to transform my opinion that you were groomed by the person you eventually married in 2007, Brigitte Macron. I believe she's a man.

316. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

317. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron has engaged in identity theft, lied about her identity, and perpetrated or directed physical violence against individuals investigating or reporting on President Macron or herself, including Owens or Isabella Ferreira.

318. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux; has not lied about her identity; and has not perpetrated or directed physical violence against any individual for investigating or reporting on President Macron or herself, including Owens or Isabella Ferreira.

319. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that President and Mrs. Macron have lied about Mrs. Macron's identity and perpetrated or directed physical violence against individuals investigating or reporting on them, including Owens or Isabella Ferreira.

320. The Statements are categorically and demonstrably false. President and Mrs. Macron have not lied about Mrs. Macron's identity or perpetrated or directed physical violence against any individual for investigating or reporting on them,

including Owens or Isabella Ferreira.

321. By publishing the Statements, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

322. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying to the public about Mrs. Macron's identity, perpetrating abuses of power, and engaging in physical violence against individuals who are investigating them.

323. Defendants knew the Statements would create a false impression about President and Mrs. Macron and intended to cause injury to President and Mrs. Macron by making the Statements.

324. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and

available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about Mrs. Macron's identity, perpetrated abuses of power, and engaged in physical violence against individuals investigating them;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

325. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

326. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

327. As a direct and proximate result of Defendants' false Statements, and resulting false impression, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct

the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

328. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

329. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT SIX – DEFAMATION BY IMPLICATION EPISODE 1 (FEBRUARY 4, 2025)

330. Plaintiffs repeat and allege paragraphs 1-240 as if set forth fully herein.

331. Defendants published the following false and defamatory statements of fact on February 4, 2025 during Episode 1 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) I literally told you that every journalist that tries to touch this story, something happens to. Okay. And it is a fact that Isabella Ferreira was working on the story, had messaged according to her friends saying that she had a bombshell about Emmanuel Macron and appreciate the French press has reported on this. And then she was

found dead floating in a river, okay. Or a pond, whatever it was. And they, the public said that she had drowned and her friends said that she was not suicidal. And the public, the press said that she had maybe taken some pills. I don't remember.

(b) Like I said, every journalist that tries to get this out. Yes, that is not a lie. That is the truth. We have upped our security because, and we were responding to the chat, people saying, get yourself some good security. And of course, when you have people walking around your property and you have young children and you understand the extent of the stakes that are in this, getting and upping on your security, that is my right.

332. Defendants juxtaposed the Statements to imply a false and defamatory connection between them, or otherwise create the false and defamatory implications that President and Mrs. Macron have lied about Mrs. Macron's identity and perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira (the **"Implications"**).

333. The Implications are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in, and in connection with, the Implications (and the Statements giving rise to them).

334. The Implications are statements of (false) fact and are reasonably understood as factual assertions that Mrs. Macron has engaged in identity theft, lied about her identity, and perpetrated or directed physical violence against any individual for investigating or reporting on President Macron or herself, including Owens or Isabella Ferreira.

335. The Implications are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux and has not lied about her identity or perpetrated or directed physical violence against any individual for investigating or reporting on President Macron or herself, including Owens or Isabella Ferreira.

336. Additionally, the Implications are statements of (false) fact and are reasonably understood as factual assertions that President and Mrs. Macron have lied about Mrs. Macron's identity and perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

337. The Implications are categorically and demonstrably false. President and Mrs. Macron have not lied about Mrs. Macron's identity or perpetrated or directed physical violence against any individual for investigating or reporting on them, including Owens or Isabella Ferreira.

338. The Implications are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying to the public about Mrs. Macron's

identity, perpetrating abuses of power, and engaging in physical violence against individuals who are investigating them.

339. The Implications are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

340. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Implications, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Implications.

341. For the reasons set forth in detail above, Defendants made the defamatory Implications with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Implications despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Implications as part of a preconceived narrative that President and Mrs. Macron have lied to the public about Mrs. Macron's identity, perpetrated abuses of power, and engaged in physical violence toward individuals investigating them;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Implications for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Implications even after being confronted with additional evidence of their falsity.

342. Defendants had no applicable privilege or legal authorization to publish the Implications, or, if they did, they abused that privilege or authorization.

343. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

344. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

345. Defendants published the Implications maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are

appropriate.

346. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT SEVEN – DEFAMATION EPISODE 2 (FEBRUARY 5, 2025)

347. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

348. Defendants published the following false and defamatory statements of fact on February 5, 2025 during Episode 2 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statement (the **"Statement"**):

> (a) He turned to his wife to know what to answer about his sister. I don't know about how you guys are feeling right now, but I'm starting to get a little icky feeling. It's all starting to feel a bit, I don't know, incestuous to me . . .

349. The Statement is of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statement.

350. The Statement is a statement of (false) fact and is reasonably understood as a statement of (false) fact—specifically, as an assertion that President and Mrs. Macron have committed incest.

351. The Statement is categorically and demonstrably false. President and Mrs. Macron have not committed incest and are not blood relatives.

352. The Statement is defamatory, and people who heard it understood it to be defamatory, because it holds President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of committing incest.

353. The Statement is defamatory *per se*, and people who heard it understood it to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in its plain and obvious meaning, it accuses President and Mrs. Macron of crimes (incest), casts aspersions on their integrity, undercuts their reputations, and has the likely effect of harming them.

354. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Statement, which is readily apparent and, in fact, intended to cause injury to the Macrons by making the Statement.

355. For the reasons set forth in detail above, Defendants made the defamatory Statement with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statement despite having actual knowledge that they were false, including based on evidence in their possession and available

to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statement as part of a preconceived narrative that President and Mrs. Macron have committed incest;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statement for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statement even after being confronted with additional evidence of their falsity.

356. Defendants had no applicable privilege or legal authorization to publish the Statement, or, if they did, they abused that privilege or authorization.

357. As a direct and proximate result of Defendants' false Statement, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

358. As a direct and proximate result of Defendants' false Statement, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs

incurred in hiring legal counsel to clear their name in the court of public opinion.

359. Defendants published the Statement maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

360. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT EIGHT – FALSE LIGHT EPISODE 2 (FEBRUARY 5, 2025)

361. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

362. Defendants published the following false statements of fact on February 5, 2025 during Episode 2 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statement (the **"Statement"**):

> (a) He turned to his wife to know what to answer about his sister. I don't know about how you guys are feeling right now, but I'm starting to get a little icky feeling. It's all starting to feel a bit, I don't know, incestuous to me . . .

363. The Statement is of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name,

including in, and in connection with, the Statement.

364. The Statemen is a statement of (false) fact and is reasonably understood as a statement of (false) fact—specifically, as an assertion that President and Mrs. Macron have committed incest.

365. The Statement is categorically and demonstrably false. President and Mrs. Macron have not committed incest and are not blood relatives.

366. By publishing the Statement, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including incest), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

367. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of committing incest.

368. Defendants knew the Statement would create a false impression about President and Mrs. Macron and intended to cause injury to President and Mrs. Macron by making the Statements.

369. For the reasons set forth in detail above, Defendants made the

defamatory Statement with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statement despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statement as part of a preconceived narrative that President and Mrs. Macron have committed incest;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statement for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statement even after being confronted with additional evidence of their falsity.

370. Defendants had no applicable privilege or legal authorization to publish the Statement, or, if they did, they abused that privilege or authorization.

371. As a direct and proximate result of Defendants' false Statement, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

372. As a direct and proximate result of Defendants' false Statement,

President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

373. Defendants published the Statement maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

374. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT NINE – DEFAMATION
EPISODE 3 (FEBRUARY 7, 2025)

375. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

376. Defendants published the following false and defamatory statements of fact on February 7, 2025 during Episode 3 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) We showed you this side by side of current President Emmanuel Macron and a person who was supposed to be Brigitte's nephew, his wife's nephew. But these two people who are not supposed to be in

any way related look way too much alike.

(b) What really happened to André-Louis, who was cremated very quickly, even though his daughter says he was buried? . . . What really happened to André-Louis? . . . Did he actually die? Did he escape with the assistance of the Élysée Palace? Did he try to escape, but the Élysée Palace intervened?

(c) There is no conspiracy here. The MKUltra was real. The government was obsessed with all of these different programs. Really, the main point of them trying to condition the brain, trying to brainwash people, sometimes through isolation, which it sounds like Emmanuel Macron spent a ton of time isolated throughout his childhood. I mean, he's acknowledging that he lived through books, and his friends are acknowledging, or should be friends are acknowledging that he was kind of a loner and on his own. So they would experiment psychologically through isolation, through drugs, you know, LSD, drugging people to see if they could get them to commit crimes or to commit other acts unwittingly, essentially trying to establish a Manchurian candidate. . . . So we don't know just how global that program went. We don't know every element of that program. . . . And one element of that program was of course, sexual perversions, like committing a sexual assault in order to then establish how it impacts somebody's psyche. Truly evil stuff. Okay. Now earlier I told you that Macron's biological alleged biological parents you see here up on the screen had some interesting jobs just off the bat. His father, Jean-Michel Macron was a psychiatrist. And yes, of course we know for a fact that psychiatrists have done some evil things, some very evil things throughout the years.

377. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

378. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron

committed identity theft, lied about her identity, lied about President Macron's identity and upbringing, committed incest, participated in government mind control programs, perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

379. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity or President Macron's identity or upbringing; committed incest; participated in government mind control programs; or perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

380. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity, lied about his identity, lied about his upbringing, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

381. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity or upbringing; committed incest; participated in mind control programs; or perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

382. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron

have lied about their identities, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

383. The Statements are categorically and demonstrably false. President and Mrs. Macron have not lied about their identities, committed incest, participated in government mind control programs, or perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

384. The Statements are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, committing incest, participating in government mind control programs, and perpetrating or directing physical violence against or faking the death of André-Louis Auzière.

385. The Statements are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely

effect of harming them.

386. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputation from the Statements, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Statements.

387. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

388. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

389. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

390. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

391. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

392. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT TEN – FALSE LIGHT EPISODE 3 (FEBRUARY 7, 2025)

393. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

394. Defendants published the following false statements of fact on February 7, 2025 during Episode 3 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) We showed you this side by side of current President Emmanuel Macron and a person who was supposed to be Brigitte's nephew, his wife's nephew. But these two people who are not supposed to be in any way related look way too much alike.

(b) What really happened to André-Louis, who was cremated very quickly, even though his daughter says he was buried? . . . What really happened to André-Louis? . . . Did he actually die? Did he escape with the assistance of the Élysée Palace? Did he try to escape, but the Élysée Palace intervened?

(c) "There is no conspiracy here. The MKUltra was real. The government was obsessed with all of these different programs. Really, the main point of them trying to condition the brain, trying to brainwash people, sometimes through isolation, which it sounds like Emmanuel Macron spent a ton of time isolated throughout his childhood. I mean, he's acknowledging that he lived through books, and his friends are acknowledging, or should be friends are acknowledging that he was kind of a loner and on his own. So they would experiment psychologically through isolation, through drugs, you know, LSD, drugging people to see if they could get them to commit crimes or to commit other acts unwittingly, essentially trying to establish a Manchurian candidate. . . . So we don't know just how global that program went. We don't know every element of that program. . . . And one element of that program was of course, sexual perversions, like committing a sexual assault in order to then establish how it impacts somebody's psyche. Truly evil stuff. Okay. Now earlier I told you that Macron's biological alleged biological parents you see here up on the screen had some interesting jobs just off the bat. His father, Jean-Michel Macron was a

> psychiatrist. And yes, of course we know for a fact that psychiatrists have done some evil things, some very evil things throughout the years.

395. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

396. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; committed incest; participated in government mind control programs; perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

397. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity or upbringing; committed incest; participated in government mind control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

398. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity; lied about his identity; lied about his upbringing; committed

incest; participated in government mind control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

399. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity or upbringing; committed incest; participated in mind control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

400. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron have lied about their identities, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

401. The Statements are categorically and demonstrably false. President and Mrs. Macron have not lied about their identities, committed incest, participated in government mind control programs, or perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

402. By publishing the Statements, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

403. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, committing incest, participating in government mind control programs, and perpetrating or directing physical violence against or faking the death of André-Louis Auzière.

404. Defendants knew the Statements would create a false impression about President and Mrs. Macron and intended to cause injury to President and Mrs. Macron by making the Statements.

405. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, participated in government mind control programs, and perpetrated or directed

physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

406. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

407. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

408. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

409. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful

indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

410. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT ELEVEN – DEFAMATION BY IMPLICATION EPISODE 3 (FEBRUARY 7, 2025)

411. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

412. Defendants published the following false and defamatory statements of fact on February 7, 2025 during Episode 3 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) We showed you this side by side of current President Emmanuel Macron and a person who was supposed to be Brigitte's nephew, his wife's nephew. But these two people who are not supposed to be in any way related look way too much alike.

(b) What really happened to André-Louis, who was cremated very quickly, even though his daughter says he was buried? . . . What really happened to André-Louis? . . . Did he actually die? Did he escape with the assistance of the Élysée Palace? Did he try to escape, but the Élysée Palace intervened?

(c) There is no conspiracy here. The MKUltra was real. The government was obsessed with all of these different programs. Really, the main point of them trying to condition the brain, trying to brainwash people, sometimes through isolation, which it sounds like Emmanuel Macron spent a ton of time isolated throughout his

> childhood. I mean, he's acknowledging that he lived through books, and his friends are acknowledging, or should be friends are acknowledging that he was kind of a loner and on his own. So they would experiment psychologically through isolation, through drugs, you know, LSD, drugging people to see if they could get them to commit crimes or to commit other acts unwittingly, essentially trying to establish a Manchurian candidate. . . . So we don't know just how global that program went. We don't know every element of that program. . . . And one element of that program was of course, sexual perversions, like committing a sexual assault in order to then establish how it impacts somebody's psyche. Truly evil stuff. Okay. Now earlier I told you that Macron's biological alleged biological parents you see here up on the screen had some interesting jobs just off the bat. His father, Jean-Michel Macron was a psychiatrist. And yes, of course we know for a fact that psychiatrists have done some evil things, some very evil things throughout the years.

413. Defendants juxtaposed the Statements to imply a false and defamatory connection between them or otherwise create the false and defamatory implications that President and Mrs. Macron lied about their identities, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière (the **"Implications"**).

414. The Implications are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in, and in connection with, the Implications (and the Statements giving rise to them).

415. The Implications are statements of (false) fact and are reasonably

understood as factual assertions that Mrs. Macron committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; committed incest; participated in government mind control programs, and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

416. The Implications are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity or upbringing; committed incest; participated in government mind control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

417. Additionally, the Implications are statements of (false) fact and are reasonably understood as factual assertions that President Macron lied about Mrs. Macron's identity; lied about his identity; lied about his upbringing; committed incest; participated in government mind control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

418. The Implications are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity; lied about his upbringing; committed incest; participated in government mind control programs; and perpetrated or directed physical violence against, or faked the death

of, André-Louis Auzière.

419. Additionally, the Implications are statements of (false) fact and are reasonably understood as factual assertions that President and Mrs. Macron lied about their identities, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

420. The Implications are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities, committed incest, participated in government mind control programs, or perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

421. The Implications are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, committing incest, participating in government mind control programs, and perpetrating or directing physical violence against or faking the death of André-Louis Auzière.

422. The Implications are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic

evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

423. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Implications, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Implications.

424. For the reasons set forth in detail above, Defendants made the defamatory Implications with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Implications despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Implications as part of a preconceived narrative that President and Mrs. Macron lied to the public about their identities or upbringing, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Implications for the purpose of generating and obtaining media attention for themselves and their business, to enrich

themselves at the expense of the truth; and

(f) Refused to retract the Implications even after being confronted with additional evidence of their falsity.

425. Defendants had no applicable privilege or legal authorization to publish the Implications, or, if they did, they abused that privilege or authorization.

426. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

427. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

428. Defendants published the Implications maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

429. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at

trial.

COUNT TWELVE – DEFAMATION
EPISODE 4 (FEBRUARY 11, 2025)

430. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

431. Defendants published the following false and defamatory statements of fact on February 11, 2025 during Episode 4 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) Today is Jean-Michel Trogneux's birthday. In other words, happy birthday, Brigitte Macron, the First Lady, Brigitte Macron.

(b) . . . Macron's immediate family was involved in helping people who had gender issues to become someone else. In other words, they were facilitating the issuing of real government IDs, which allowed people to legally shed themselves of their former identities and their true biological sex. We have to wake up to the fact that that is the reality of the world that we live in today. So what are the implications of that?

(c) But what we can't tell you is what exactly happened to [André-Louis Auzière]. We cannot ascertain what happened to him based on the testimony of his first cousin, because it depends on whether or not you believe his partner, the woman who was at his funeral, who claimed that she found tickets to Africa in his pocket, that he had emptied all of his bank accounts. And if you potentially, or you could say, and, or if you believe the journalist from Paris Match, who then wrote that André actually spent the last days of his life in a psychiatric ward being guarded by none other than Alexander Benalla.

(d) With forgery, extortion, and most importantly, with access to a woman who can facilitate the changing of identities, it is not enough

for any person investigating this case to ask questions like, is this Brigitte Trogneux in the wedding photo?

(e) Because we can confirm that that is indeed a photo of a woman named Brigitte Trogneux in that wedding photo where that Brigitte is. We cannot confirm because the first lady refuses to answer. She has a mother-in-law who helps transgender people get new identities. So you have to essentially understand that you can just take somebody's name. You can take, you can become somebody else at a moment's notice. Now, legally, when you become transgender, okay. This brings us to Jean-Michel Trogneux.

(f) If it's really you, Brigitte Macron, and you didn't take on the identity of your sister, if it's really you . . .

(g) The only question that remains is who the hell is Brigitte Macron? And the obvious answer to me, and after you see these photos that you are going to see, one in particular, from when Jean-Michel Trogneux was 18, you're going to fall down like I did when I saw it. It's completely crazy.

(h) There's no question upon seeing this technology, in my mind, that Jean-Michel Trogneux is Brigitte Macron. The only question that I have is what happened to his sister, Brigitte Trogneux.

432. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

433. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

434. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

435. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity; lied about his identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

436. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière .

437. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron lied about their identities and perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

438. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

439. The Statements are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft; lying about President or Mrs. Macron's identities; and perpetrating or directing physical violence against, or faking the death of, André-Louis Auzière.

440. The Statements are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

441. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputation from the Statements, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Statements.

442. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron lied to the public about their identities or upbringing, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

443. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

444. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

445. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have

had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

446. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

447. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT THIRTEEN – FALSE LIGHT
EPISODE 4 (FEBRUARY 11, 2025)

448. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

449. Defendants published the following false statements of fact on February 11, 2025 during Episode 4 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) Today is Jean-Michel Trogneux's birthday. In other words, happy birthday, Brigitte Macron, the First Lady, Brigitte Macron.

(b) . . . Macron's immediate family was involved in helping people who had gender issues to become someone else. In other words, they

were facilitating the issuing of real government IDs, which allowed people to legally shed themselves of their former identities and their true biological sex. We have to wake up to the fact that that is the reality of the world that we live in today. So what are the implications of that?

(c) But what we can't tell you is what exactly happened to [André-Louis Auzière]. We cannot ascertain what happened to him based on the testimony of his first cousin, because it depends on whether or not you believe his partner, the woman who was at his funeral, who claimed that she found tickets to Africa in his pocket, that he had emptied all of his bank accounts. And if you potentially, or you could say, and, or if you believe the journalist from Paris Match, who then wrote that André actually spent the last days of his life in a psychiatric ward being guarded by none other than Alexander Benalla.

(d) With forgery, extortion, and most importantly, with access to a woman who can facilitate the changing of identities, it is not enough for any person investigating this case to ask questions like, is this Brigitte Trogneux in the wedding photo?

(e) Because we can confirm that that is indeed a photo of a woman named Brigitte Trogneux in that wedding photo where that Brigitte is. We cannot confirm because the first lady refuses to answer. She has a mother-in-law who helps transgender people get new identities. So you have to essentially understand that you can just take somebody's name. You can take, you can become somebody else at a moment's notice. Now, legally, when you become transgender, okay. This brings us to Jean-Michel Trogneux.

(f) If it's really you, Brigitte Macron, and you didn't take on the identity of your sister, if it's really you . . .

(g) The only question that remains is who the hell is Brigitte Macron? And the obvious answer to me, and after you see these photos that you are going to see, one in particular, from when Jean-Michel Trogneux was 18, you're going to fall down like I did when I saw it. It's completely crazy.

(h) There's no question upon seeing this technology, in my mind, that

> Jean-Michel Trogneux is Brigitte Macron. The only question that I have is what happened to his sister, Brigitte Trogneux.

450. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in, and in connection with, the Statements.

451. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

452. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

453. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity; lied about his identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

454. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity and

upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

455. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron lied about their identities and perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

456. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

457. By publishing the Statements, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

458. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace, and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about President or Mrs. Macron's identities, and perpetrating or directing physical violence against or faking the death of André-

Louis Auzière.

459. Defendants knew the Statements would create a false impression about President and Mrs. Macron and intended to cause injury to President and Mrs. Macron by making the Statements.

460. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron lied to the public about their identities or upbringing, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

461. Defendants had no applicable privilege or legal authorization to publish

the Statements, or, if they did, they abused that privilege or authorization.

462. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

463. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

464. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

465. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT FOURTEEN – DEFAMATION BY IMPLICATION
EPISODE 4 (FEBRUARY 11, 2025)

466. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

467. Defendants published the following false and defamatory statements of

fact on February 11, 2025 during Episode 4 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) Macron's immediate family was involved in helping people who had gender issues to become someone else. In other words, they were facilitating the issuing of real government IDs, which allowed people to legally shed themselves of their former identities and their true biological sex. We have to wake up to the fact that that is the reality of the world that we live in today. So what are the implications of that?

(b) But what we can't tell you is what exactly happened to [André-Louis Auzière]. We cannot ascertain what happened to him based on the testimony of his first cousin, because it depends on whether or not you believe his partner, the woman who was at his funeral, who claimed that she found tickets to Africa in his pocket that he had emptied all of his bank accounts. And if you potentially, or you could say, and, or if you believe the journalist from Paris Match, who then wrote that André actually spent the last days of his life in a psychiatric ward being guarded by none other than Alexander Benalla.

(c) With forgery, extortion, and most importantly, with access to a woman who can facilitate the changing of identities, it is not enough for any person investigating this case to ask questions like, is this Brigitte Trogneux in the wedding photo?

(d) Because we can confirm that that is indeed a photo of a woman named Brigitte Trogneux in that wedding photo where that Brigitte is. We cannot confirm because the first lady refuses to answer. She has a mother-in-law who helps transgender people get new identities. So you have to essentially understand that you can just take somebody's name. You can take, you can become somebody else at a moment's notice. Now, legally, when you become transgender, okay. This brings us to Jean-Michel Trogneux.

468. Defendants juxtaposed the Statements to imply a false and defamatory connection between them or otherwise create the false and defamatory implications that President and Mrs. Macron have committed identity theft; lied about their identities and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière (the **"Implications"**).

469. The Implications are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Implications (and the Statements giving rise to them).

470. The Implications are statements of (false) fact and are reasonably understood as factual assertions that Mrs. Macron has committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

471. The Implications are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

472. Additionally, the Implications are statements of (false) fact and are

reasonably understood as factual assertions that President Macron lied about Mrs. Macron's identity; lied about his identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

473. The Implications are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity and upbringing; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

474. Additionally, the Implications are statements of (false) fact and are reasonably understood as factual assertions that President and Mrs. Macron have lied about their identities and perpetrated or directed physical violence against or faked the death of André-Louis Auzière.

475. The Implications are categorically and demonstrably false. President and Mrs. Macron have not lied about their identities or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

476. The Implications are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft; lying about their identities; and

perpetrating or directing physical violence against, or faking the death of, André-Louis Auzière.

477. The Implications are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

478. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Implications, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Implications.

479. For the reasons set forth in detail above, Defendants made the defamatory Implications with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Implications despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Implications as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing and perpetrated or directed physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Implications for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Implications even after being confronted with additional evidence of their falsity.

480. Defendants had no applicable privilege or legal authorization to publish the Implications, or, if they did, they abused that privilege or authorization.

481. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

482. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

483. Defendants published the Implications maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are

appropriate.

484. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT FIFTEEN – DEFAMATION
EPISODE 5 (FEBRUARY 13, 2025)

485. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

486. Defendants published the following false and defamatory statements of fact on February 13, 2025 during Episode 5 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) This is a good time to tell you that most of what you think you even know about Emmanuel Macron thus far, his legacy. Yeah, it's just objectively not true. Emmanuel had a major hand up in life. This guy so private, we don't know much about him. What we do know about him is I would say quite sinister. It's quite sinister. It's making me think, I don't know, of that movie, *The Manchurian Candidate*.

(b) Brigitte Macron perhaps is Jean-Michel Trogneux.

(c) Who are you really, and what is your relationship to Emmanuel Macron? What is Emmanuel Macron's relationship to you? What is the relationship between Emmanuel Macron and Jean-Jacques? It's not feeling like a nephew to me.

(d) He's just a puppet. And he has been groomed from that time that he was a child, but groomed by who, who is his father? Who is his father? . . . he doesn't really seem to have close relations with his

parents of these, his doctors, perhaps. . . they can change identities, and they can change names. This family has this capacity.

(e) There are too many similarities between the upbringing of []Emmanuel Macron and as we talked about the upbringing of Kamala Harris, the upbringing of Barack Obama, you know, these people being raised by their grandparents at a time when we know that the MKUltra program was running and there is something very, very wrong there.

487. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

488. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

489. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

490. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity; lied about his identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

491. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

492. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron lied about their identities, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

493. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities, committed incest, participated in government mind control programs, or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

494. The Statements are defamatory, and people who heard them understood

them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft; lying about their identities; committing incest; participating in government mind-control programs; and perpetrating or directing physical violence against, or faking the death of, André-Louis Auzière.

495. The Statements are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

496. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputation from the Statements, which is readily apparent and, in fact, intended to cause injury to the Macrons by making the Statements.

497. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and

available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, participating in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

498. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

499. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

500. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have

had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

501. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

502. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT SIXTEEN – FALSE LIGHT
EPISODE 5 (FEBRUARY 13, 2025)

503. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

504. Defendants published the following false statements of fact on February 13, 2025 during Episode 5 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) This is a good time to tell you that most of what you think you even know about Emmanuel Macron thus far, his legacy. Yeah, it's just objectively not true. Emmanuel had a major hand up in life. This guy so private, we don't know much about him. What we do know about him is I would say quite sinister. It's quite sinister. It's

making me think, I don't know, of that movie, *The Manchurian Candidate*.

(b) Brigitte Macron perhaps is Jean-Michel Trogneux.

(c) Who are you really, and what is your relationship to Emmanuel Macron? What is Emmanuel Macron's relationship to you? What is the relationship between Emmanuel Macron and Jean-Jacques? It's not feeling like a nephew to me.

(d) He's just a puppet. And he has been groomed from that time that he was a child, but groomed by who, who is his father? Who is his father? . . . he doesn't really seem to have close relations with his parents of these, his doctors, perhaps. . . they can change identities, and they can change names. This family has this capacity.

(e) There are too many similarities between the upbringing of []Emmanuel Macron and as we talked about the upbringing of Kamala Harris, the upbringing of Barack Obama, you know, these people being raised by their grandparents at a time when we know that the MKUltra program was running and there is something very, very wrong there.

505. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

506. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

507. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; committed incest; participated in government mind-control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

508. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity; lied about his identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

509. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity and upbringing; committed incest; participated in government mind-control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

510. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron lied about their identities; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the

death, of André-Louis Auzière.

511. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities; committed incest; participated in government mind-control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

512. By publishing the Statements, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

513. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft; lying about their identities; committing incest; participating in government mind-control programs; and perpetrating or directing physical violence against, or faking the death of, André-Louis Auzière.

514. Defendants knew the Statements would create a false impression about President and Mrs. Macron and intended to cause injury to President and

Mrs. Macron by making the Statements.

515. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

516. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

517. As a direct and proximate result of Defendants' false Statements,

President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

518. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

519. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

520. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT SEVENTEEN – DEFAMATION BY IMPLICATION EPISODE 5 (FEBRUARY 13, 2025)

521. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

522. Defendants published the following false and defamatory statements of fact on February 13, 2025 during Episode 5 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple

Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) This is a good time to tell you that most of what you think you even know about Emmanuel Macron thus far, his legacy. Yeah, it's just objectively not true. Emmanuel had a major hand up in life. This guy so private, we don't know much about him. What we do know about him is I would say quite sinister. It's quite sinister. It's making me think, I don't know, of that movie, *The Manchurian Candidate*.

(b) Who are you really, and what is your relationship to Emmanuel Macron? What is Emmanuel Macron's relationship to you? What is the relationship between Emmanuel Macron and Jean-Jacques? It's not feeling like a nephew to me.

(c) He's just a puppet. And he has been groomed from that time that he was a child, but groomed by who, who is his father? Who is his father? . . . he doesn't really seem to have close relations with his parents of these, his doctors, perhaps. . . they can change identities, and they can change names. This family has this capacity.

(d) There are too many similarities between the upbringing of []Emmanuel Macron and as we talked about the upbringing of Kamala Harris, the upbringing of Barack Obama, you know, these people being raised by their grandparents at a time when we know that the MKUltra program was running and there is something very, very wrong there.

523. Defendants juxtaposed the Statements to imply a false and defamatory connection between them, or otherwise create the false and defamatory implications that President and Mrs. Macron lied about their identities and upbringing, committed incest, participated in government mind control programs, and perpetrated or directed physical violence against or faked the death of André-Louis Auzière (the **"Implications"**).

524. The Implications are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Implications (and the Statements giving rise to them).

525. The Implications are statements of (false) fact and are reasonably understood as factual assertions that Mrs. Macron committed identity theft; lied about her identity; lied about President Macron's identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

526. The Implications are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft; lied about her identity; lied about President Macron's identity or upbringing; committed incest; participated in government mind-control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

527. Additionally, the Implications are statements of (false) fact and are reasonably understood factual assertions that President Macron has lied about Mrs. Macron's identity; lied about his identity and upbringing; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

528. The Implications are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity; lied about his identity and upbringing; committed incest; participated in government mind-control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

529. Additionally, the Implications are statements of (false) fact and are reasonably understood as factual assertions that President and Mrs. Macron have lied about their identities; committed incest; participated in government mind-control programs; and perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

530. The Implications are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities; committed incest; participated in government mind-control programs; or perpetrated or directed physical violence against, or faked the death of, André-Louis Auzière.

531. The Implications are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace, and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft; lying about their identities; committing

incest; participating in government mind-control programs; and perpetrating or directing physical violence against, or faking the death of, André-Louis Auzière.

532. The Implications are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, fraud, and murder), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

533. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Implications, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Implications.

534. For the reasons set forth in detail above, Defendants made the defamatory Implications with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Implications despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Implications as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, participated in government mind control programs, and perpetrated or directed

physical violence against or faked the death of André-Louis Auzière;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Implications for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Implications even after being confronted with additional evidence of their falsity.

535. Defendants had no applicable privilege or legal authorization to publish the Implications, or, if they did, they abused that privilege or authorization.

536. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

537. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

538. Defendants published the Implications maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless,

and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

539. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT EIGHTEEN – DEFAMATION EPISODE 6 (FEBRUARY 17, 2025)

540. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

541. Defendants published the following false statements of fact on February 17, 2025 during Episode 6 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

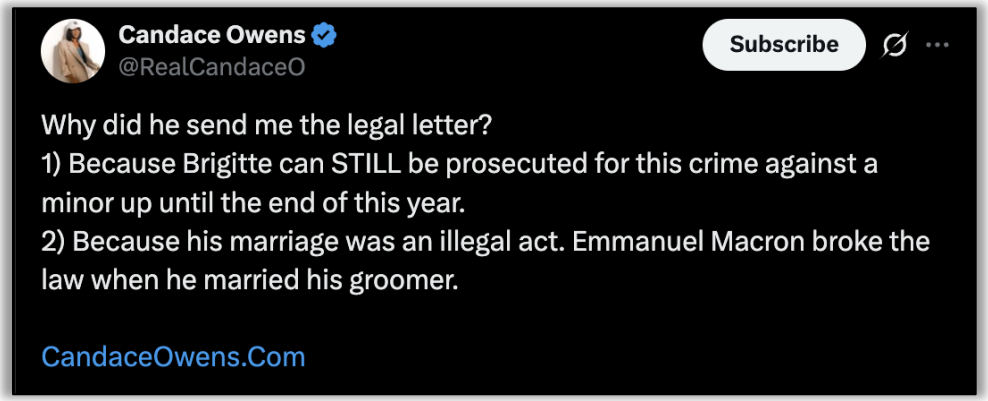
> (a) I think a year from now, most of the world will be awakened to the fact that what I said one year ago is true. I believe that Emmanuel Macron is a homosexual man that was groomed from his youth. I believe the individual who groomed him is now his wife. I believe that his wife was born Jean-Michel Trogneux and transitioned in his early thirties, and I believe that the entire state is colluding to protect that secret. And like I said, I would stake my entire professional career on all of those points.

542. Defendants published several X posts in support of Episode 6. In those X posts, Defendants made, endorsed, and adopted the following false statements (the

"Statements"):

(a) On February 18, 2025, Defendants posted on X: "Emmanuel Macron married a man. Which was illegal at the time that he did it."[69]

(b) On February 18, 2025, Defendants posted on X: "Why did he send me the legal letter? 1) Because Brigitte can STILL be prosecuted for this crime against a minor up until the end of this year. 2) Because his marriage was an illegal act. Emmanuel Macron broke the law when he married his groomer."[70]



543. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name,

[69] Candace Owens (@RealCandaceO), X (Feb. 18, 2025, at 9:45 ET), https://x.com/RealCandaceO/status/1891861509975703647.

[70] Candace Owens (@RealCandaceO), X (Feb. 18, 2025, at 9:47 ET), https://x.com/RealCandaceO/status/1891862093575462960

including in and in connection with the Statements.

544. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft, lied about her identity, lied about President Macron's identity and upbringing, abused state power to cover up such lies, and committed a crime by marrying President Macron.

545. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft, lied about her identity, lied about President Macron's identity or upbringing, abused state power to cover up such lies, or committed a crime by marrying President Macron.

546. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity, lied about his identity and upbringing, abused state power to cover up such lies, and committed a crime by marrying Mrs. Macron.

547. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity, lied about his identity and upbringing, abused state power to cover up such lies, or committed a crime by marrying Mrs. Macron.

548. Additionally, the Statements are statements of (false) fact and are

reasonably understood as statements of (false) fact that President and Mrs. Macron lied about their identities, abused state power to cover up such lies, and committed a crime by getting married.

549. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities, abused state power to cover up such lies, or committed a crime by marrying.

550. The Statements are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, abusing state power to cover up such lies, and committing a crime by marrying.

551. The Statements are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and illegal marriage), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

552. Defendants knew the substantial danger of injury to President and

Mrs. Macron and their reputation from the Statements, which is readily apparent and, in fact, intended to cause injury to the Macrons by making the Statements.

553. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron lied to the public about their identities or upbringing, abused state power to cover up such lies, and committed a crime by marrying;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

554. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

555. As a direct and proximate result of Defendants' false Statements,

President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

556. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

557. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

558. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT NINETEEN – FALSE LIGHT EPISODE 6 (FEBRUARY 17, 2025)

559. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

560. Defendants published the following false statements of fact on February 17, 2025 during Episode 6 of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and

Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) I think a year from now, most of the world will be awakened to the fact that what I said one year ago is true. I believe that Emmanuel Macron is a homosexual man that was groomed from his youth. I believe the individual who groomed him is now his wife. I believe that his wife was born Jean-Michel Trogneux and transitioned in his early thirties, and I believe that the entire state is colluding to protect that secret. And like I said, I would stake my entire professional career on all of those points.

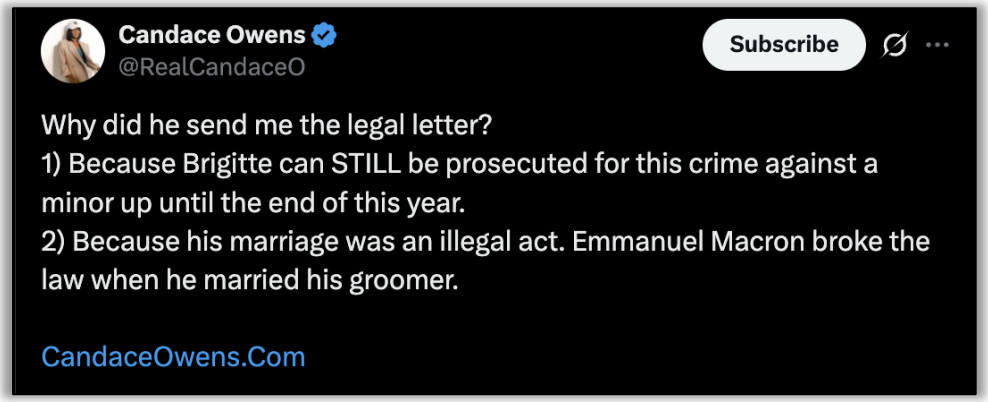
561. Defendants published several X posts in support of Episode 6. In those X posts, Defendants made, endorsed, and adopted the following false statements of fact (the **"Statements"**):

(a) On February 18, 2025, Defendants posted on X: "Emmanuel Macron married a man. Which was illegal at the time that he did it."[71]

(b) On February 18, 2025, Defendants posted on X: "Why did he send me the legal letter? 1) Because Brigitte can STILL be prosecuted for this crime against a minor up until the end of this year. 2) Because his marriage was an illegal act. Emmanuel Macron broke

[71] Candace Owens (@RealCandaceO), X (Feb. 18, 2025, at 9:45 ET), https://x.com/RealCandaceO/status/1891861509975703647.

the law when he married his groomer."[72]



562. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

563. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft, lied about her identity, lied about President Macron's identity and upbringing, abused state power to cover up such lies, and committed a crime by marrying President Macron.

564. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft, lied about her identity, lied about President Macron's identity or upbringing, abused state power to cover up such lies, or committed a crime by marrying President Macron.

[72] Candace Owens (@RealCandaceO), X (Feb. 18, 2025, at 9:47 ET), https://x.com/RealCandaceO/status/1891862093575462960

565. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron lied about Mrs. Macron's identity, lied about his identity and upbringing, abused state power to cover up such lies, and committed a crime by marrying Mrs. Macron.

566. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity, lied about his identity and upbringing, abused state power to cover up such lies, and did not commit a crime by marrying Mrs. Macron.

567. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron have lied about their identities, abused state power to cover up such lies, and committed a crime by getting married.

568. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities, abused state power to cover up such lies, or committed a crime by marrying.

569. By publishing the Statements, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including identity theft, forgery, fraud, and illegal marriage), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

570. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, abusing state power to cover up such lies, and committing a crime by marrying.

571. Defendants knew the Statements would create a false impression about President and Mrs. Macron and intended to cause injury to President and Mrs. Macron by making the Statements.

572. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron lied to the public about their identities or upbringing, abused state power to cover up such lies, and committed a crime by marrying;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the

preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

573. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

574. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

575. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

576. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

577. In view of the foregoing, President and Mrs. Macron are entitled to

actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT TWENTY – DEFAMATION
EPILOGUE (FEBRUARY 20, 2025)

578. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

579. Defendants published the following false and defamatory statements of fact on February 20, 2025, during the Epilogue of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) I know there are so many lingering questions. Is Brigitte Macron, the first First Lady of France, Emmanuel Macron's biological father? We're hearing that a lot. Where is the real Brigitte Trogneux?

(b) Okay, so many of you had suspected that these families might all be related. Are the Auzières, the Trogneux, and the Macrons all just from the same family? Is there a chance that Brigitte Macron some of you asked is actually the father of Emmanuel Macron?

(c) We definitely know and have confirmed like we did in the last episode that he had his hand held through his career by uh, David de Rothschild. A family that is known and is on record as having practiced incest. Okay, why and how did Emmanuel Macron get so close to the Rothschilds? So close that his colleague said this dude didn't even know what EBITDA meant and yet he became the youngest managing partner. We understood that whatever it was David Rothschild was holding his hand. He just couldn't question the power that he was being given and we would laugh at him in meetings because he knew nothing about finance. Why did David Rothschild see to it that Emmanuel had his hand held? Vice is nice, but incest is best because it stays in the family. That is a direct quote

from David de Rothschild's cousin Natalie Reams Rothschild . . . . Then there was a biography which was written by author Natalie Livingston, which was entitled "The Women of Rothschild," which sort of revealed the maniacal desire that the Rothschild family had to maintain their fortune and their power in the world. A desire that was so maniacal that they practiced family incest. That is just undeniable. It is a fact. Okay, and allegedly they did this only until it was no longer socially acceptable. Right up until the late 19th century, you guys, right before we get into this this Trogneux family. It's just amazing. . . .

(d) Yes, I agree with those of you that are commenting right now that we are looking potentially at incest. That is, that is what in my guts feels it has to be a secret so big that it would make them react in this way because it is a type of violence to treat journalists like this. It is a [] kind of emotional violence to do these sorts of things and they do it as though they know that vice is nice, but incest is best and things should be kept within the family.

580. On February 20, 2025, Defendants published an X post in support of the Epilogue of the Series.[73] In that X post, Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) Is Brigitte Macron [President Macron's] father?

(b) What happened to the real Brigitte?

[73] Candace Owens (@RealCandaceO), X (Feb. 20, 2025, at 16:00 ET), https://x.com/RealCandaceO/status/1892680741172941033.

581. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

582. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft, lied about her identity, lied about President Macron’s identity and upbringing, committed incest, and abused state power to cover up such lies.

583. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft, lied about her identity, lied about President Macron’s identity or upbringing, committed incest, or abused state power to cover up such lies.

584. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron has lied about Mrs. Macron's identity, lied about his identity and upbringing, committed incest, and abused state power to cover up such lies.

585. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity, lied about his identity and upbringing, committed incest, or abused state power to cover up such lies.

586. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron lied about their identities, committed incest, and abused state power to cover up such lies.

587. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities, committed incest, or abused state power to cover up such lies.

588. The Statements are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, committing incest, and

abusing state power to cover up such lies.

589. The Statements are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, and fraud), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

590. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputation from the Statements, which is readily apparent and, in fact, intended to cause injury to the Macrons by making the Statements.

591. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who wereobviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, and abused state power to cover up such lies;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the

preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

592. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

593. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

594. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

595. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

596. In view of the foregoing, President and Mrs. Macron are entitled to

actual, presumed, and punitive damages in amounts to be specifically determined at trial.

COUNT TWENTY-ONE – FALSE LIGHT
EPILOGUE (FEBRUARY 20, 2025)

597. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

598. Defendants published the following false statements of fact on February 20, 2025 during the Epilogue of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

(a) I know there are so many lingering questions. Is Brigitte Macron, the First Lady of France, Emmanuel Macron's biological father? We're hearing that a lot. Where is the real Brigitte Trogneux?

(b) Okay, so many of you had suspected that these families might all be related. Are the Auzières, the Trogneux, and the Macrons all just from the same family? Is there a chance that Brigitte Macron some of you asked is actually the father of Emmanuel Macron?

(c) We definitely know and have confirmed like we did in the last episode that he had his hand held through his career by uh, David de Rothschild. A family that is known and is on record as having practiced incest. Okay, why and how did Emmanuel Macron get so close to the Rothschilds? So close that his colleague said this dude didn't even know what EBITDA meant and yet he became the youngest managing partner. We understood that whatever it was David Rothschild was holding his hand. He just couldn't question the power that he was being given and we would laugh at him in meetings because he knew nothing about finance. Why did David Rothschild see to it that Emmanuel had his hand held? Vice is nice, but incest is best because it stays in the family. That is a direct quote from David de Rothschild's cousin Natalie Reams Rothschild . . . .

> Then there was a biography which was written by author Natalie Livingston, which was entitled "The Women of Rothschild," which sort of revealed the maniacal desire that the Rothschild family had to maintain their fortune and their power in the world. A desire that was so maniacal that they practiced family incest. That is just undeniable. It is a fact. Okay, and allegedly they did this only until it was no longer socially acceptable. Right up until the late 19th century, you guys, right before we get into this this Trogneux family. It's just amazing. . . .
>
> (d) Yes, I agree with those of you that are commenting right now that we are looking potentially at incest. That is, that is what in my guts feels it has to be a secret so big that it would make them react in this way because it is a type of violence to treat journalists like this. It is a [] kind of emotional violence to do these sorts of things and they do it as though they know that vice is nice, but incest is best and things should be kept within the family.

599. On February 20, 2025, Defendants published an X post in support of the Epilogue of the Series.[74] In that X post, Defendants made, endorsed, and adopted the following false statements (the **"Statements"**):

> (e) Is Brigitte Macron [President Macron's] father?
>
> (f) What happened to the real Brigitte?

[74] *Id.*

600. The Statements are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Statements.

601. The Statements are statements of (false) fact and are reasonably understood as statements of (false) fact—specifically, as assertions that Mrs. Macron committed identity theft, lied about her identity, lied about President Macron’s identity and upbringing, committed incest, and abused state power to cover up such lies.

602. The Statements are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft, lied about her identity, lied about President Macron’s identity or upbringing, committed incest, or abused state power to cover up such lies.

603. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President Macron has lied about Mrs. Macron's identity, lied about his identity and upbringing, committed incest, and abused state power to cover up such lies.

604. The Statements are categorically and demonstrably false. President Macron has never lied about Mrs. Macron's identity, lied about his identity and upbringing, committed incest, or abused state power to cover up such lies.

605. Additionally, the Statements are statements of (false) fact and are reasonably understood as statements of (false) fact that President and Mrs. Macron lied about their identities, committed incest, and abused state power to cover up such lies.

606. The Statements are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities, committed incest, or abused state power to cover up such lies.

607. By publishing the Statements, Defendants have portrayed President and Mrs. Macron in a false light because they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, and fraud), cast aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

608. The false light created by Defendants would be highly offensive to a reasonable person because they hold President and Mrs. Macron up to public hatred,

contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, committing incest, and abusing state power to cover up such lies.

609. Defendants knew the Statements would create a false impression about President and Mrs. Macron and intended to cause injury to President and Mrs. Macron by making the Statements.

610. For the reasons set forth in detail above, Defendants made the defamatory Statements with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Statements despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Statements as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, and abused state power to cover up such lies;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Statements for the purpose of generating and obtaining

media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Statements even after being confronted with additional evidence of their falsity.

611. Defendants had no applicable privilege or legal authorization to publish the Statements, or, if they did, they abused that privilege or authorization.

612. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

613. As a direct and proximate result of Defendants' false Statements, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

614. Defendants published the Statements maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

615. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at

trial.

COUNT TWENTY-TWO – DEFAMATION BY IMPLICATION
EPILOGUE (FEBRUARY 20, 2025)

616. Plaintiffs repeat and allege paragraphs 1-248 as if set forth fully herein.

617. Defendants published the following false and defamatory statement of fact on February 20, 2025 during the Epilogue of the Series, which Defendants published on CandaceOwens.com, YouTube, Spotify, Audible, iHeartRadio, Apple Podcasts, and Amazon Music, and hyperlinked on X. Defendants made, endorsed, and adopted the following false statement (the **"Statement"**):

> (a) We definitely know and have confirmed like we did in the last episode that he had his hand held through his career by uh, David de Rothschild. A family that is known and is on record as having practiced incest. Okay, why and how did Emmanuel Macron get so close to the Rothschilds? So close that his colleague said this dude didn't even know what EBITDA meant and yet he became the youngest managing partner. We understood that whatever it was David Rothschild was holding his hand. He just couldn't question the power that he was being given and we would laugh at him in meetings because he knew nothing about finance. Why did David Rothschild see to it that Emmanuel had his hand held? Vice is nice, but incest is best because it stays in the family. That is a direct quote from David de Rothschild's cousin Natalie Reams Rothschild . . . . Then there was a biography which was written by author Natalie Livingston, which was entitled "The Women of Rothschild," which sort of revealed the maniacal desire that the Rothschild family had to maintain their fortune and their power in the world. A desire that was so maniacal that they practiced family incest. That is just undeniable. It is a fact. Okay, and allegedly they did this only until it was no longer socially acceptable. Right up until the late 19th century, you guys, right before we get into this this Trogneux family. It's just amazing. . . .

618. Defendants juxtaposed the Statement to create the false and defamatory implications that President and Mrs. Macron have lied about their identities, committed incest, and abused state power to cover up such lies (the **"Implications"**).

619. The Implications are of and concerning President and Mrs. Macron. Indeed, Defendants repeatedly identified President and Mrs. Macron by name, including in and in connection with the Implications (and the Statements giving rise to them).

620. The Implications are statements of (false) fact and are reasonably understood as factual assertions that Mrs. Macron committed identity theft, lied about her identity, lied about President Macron's identity and upbringing, committed incest, and abused state power to cover up such lies.

621. The Implications are categorically and demonstrably false. Mrs. Macron was born a woman named Brigitte Trogneux. Mrs. Macron has never committed identity theft, lied about her identity, lied about President Macron's identity or upbringing, committed incest, or abused state power to cover up such lies.

622. Additionally, the Implications are statements of (false) fact and are reasonably understood as factual assertions that President Macron lied about Mrs. Macron's identity, lied about his identity and upbringing, committed incest, and abused state power to cover up such lies.

623. The Implications are categorically and demonstrably false. President

Macron has never lied about Mrs. Macron's identity, lied about his identity or upbringing, committed incest, or abused state power to cover up such lies.

624. Additionally, the Implications are statements of (false) fact and are reasonably understood as factual assertions that President and Mrs. Macron lied about their identities, committed incest, and abused state power to cover up such lies.

625. The Implications are categorically and demonstrably false. President and Mrs. Macron have never lied about their identities, committed incest, or abused state power to cover up such lies.

626. The Implications are defamatory, and people who heard them understood them to be defamatory, because they hold President and Mrs. Macron up to public hatred, contempt, ridicule, or disgrace and tend to harm President and Mrs. Macron's reputations as to lower them in the estimation of the community or to deter third persons from associating or dealing with them, including by accusing President and Mrs. Macron of identity theft, lying about their identities, committing incest, and abusing state power to cover up such lies.

627. The Implications are defamatory *per se*, and people who heard them understood them to be defamatory *per se*, because, without reference to extrinsic evidence and viewed in their plain and obvious meaning, they accuse President and Mrs. Macron of crimes (including identity theft, incest, forgery, and fraud), cast

aspersions on their integrity, undercut their reputations, and have the likely effect of harming them.

628. Defendants knew the substantial danger of injury to President and Mrs. Macron and their reputations from the Implications, which is readily apparent, and, in fact, intended to cause injury to the Macrons by making the Implications.

629. For the reasons set forth in detail above, Defendants made the defamatory Implications with actual malice, including with actual, subjective awareness of their falsity, as evidenced by the facts that Defendants:

(a) Made the Implications despite having actual knowledge that they were false, including based on evidence in their possession and available to them that they actually reviewed;

(b) Relied on sources who were obviously biased against President and Mrs. Macron and whom Defendants knew to be biased against President and Mrs. Macron;

(c) Made the Implications as part of a preconceived narrative that President and Mrs. Macron have lied to the public about their identities or upbringing, committed incest, and abused state power to cover up such lies;

(d) Deliberately ignored voluminous evidence in their possession and available to them—as detailed above—that contradicted the preconceived narrative they wanted to tell about President and Mrs. Macron;

(e) Made the Implications for the purpose of generating and obtaining media attention for themselves and their business, to enrich themselves at the expense of the truth; and

(f) Refused to retract the Implications even after being confronted with additional evidence of their falsity.

630. Defendants had no applicable privilege or legal authorization to publish the Implications, or, if they did, they abused that privilege or authorization.

631. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial economic damages, including, among other things, loss of future business opportunities and such other compounding and growing losses as will be shown at trial.

632. As a direct and proximate result of Defendants' false Implications, President and Mrs. Macron have suffered substantial reputational damage and have had to spend considerable sums of money to correct the public record about their actions and mitigate the reputational harm they have suffered, including costs incurred in hiring legal counsel to clear their name in the court of public opinion.

633. Defendants published the Implications maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to President and Mrs. Macron's rights, and with a desire to cause injury to President and Mrs. Macron. Accordingly, punitive damages are appropriate.

634. In view of the foregoing, President and Mrs. Macron are entitled to actual, presumed, and punitive damages in amounts to be specifically determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment in Plaintiffs' favor, and against Defendants, jointly and severally, as follows:

(g) awarding the Macrons actual and presumed damages to be specifically determined at trial;

(h) awarding the Macrons punitive and/or exemplary damages;

(i) awarding the Macrons all costs, disbursements, fees, and interest as authorized by law; and

(j) such other and additional remedies as the Court may deem just and proper.

A JURY TRIAL IS DEMANDED.

Dated: July 23, 2025

Respectfully submitted,

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