

Massachusetts Trial Court
Superior Court Department
Berkshire Division

Brandon Wynn Navom,

Plaintiff,

v.

Averred Complaint

Boston Mayor Marty Walsh, in his
personal capacity

Defendant

I, BRANDON NAMVOM, hereby testify under pains of perjury that all of the following facts are true or believed to be true, all of the following beliefs are believed to be true, and all of the following statements of law are beliefs believed to be true:¹



Date: October 23, 2017

1. My name is Brandon Navom and my address is and my address is 30 Billerica Street, Lowell, MA 01852.
2. The defendant, Marty Walsh, is currently the Mayor of Boston, but I am suing him in his personal capacity.
3. According to campaign records, Mayor Maltly Walsh's address is 2 Butler Street in Boston, Massachusetts, and that is the address that he is using for his reelection campaign.
4. While I ultimately decided to not join, I was one of the organizers of "The Boston Free Speech Rally," on Saturday, August 19, 2017, which occurred at the Parkman Grandstand on Boston Common.
5. It was well known that I was an organizer because I appeared on the flier and I appeared on television newscast as an event organizer.

¹ While this document is a complaint, it also serves as a supporting affidavit because it is made under pains of perjury.

6. I was also to be speaker at the Boston Free Speech rally, and this too was publically known.
7. The Boston Free Speech Rally garnered tremendous media coverage, and Mayor Marty Walsh's comments were literally heard or read by hundreds of thousands, if not millions of people.
8. Despite fully knowing that none of the speakers were "white supremacists," "hate group members," or "neo-Nazis" or otherwise affiliated with any type of hate group, the Mayor of Boston repetitiously characterized the speakers as such.
9. The Mayor of Boston, Marty Walsh, had spent incredible resources preparing for the event, and clearly did background searches on the organizers, the speakers, and those expected to attend.
10. The Mayor's statements were either knowing lies or reckless false statements--- the false statements were a result of conduct more egregious than mere negligence.
11. While I am not asserting that I am a "limited public figure," the Mayor's statements were made with "actual malice" and meet the standards of malice as required by the First Amendment of the United States Constitution and the free speech provisions of the Massachusetts Constitution for a "limited public figure", because the libelous statements were either knowing lies or made with a reckless disregard for the truth.
12. The information available to anybody who had time to do the most cursory of Google searches at the time of mayor's comments would have indicated that none of the speakers were white supremacist or affiliated with a hate group, and there is no doubt that Mayor Marty Walsh was aware of such information but made his defamatory statements nonetheless with malice and for political gain.
13. Such information that Mayor Marty Walsh was aware of but made his libelous, slanderous or otherwise defamatory comments included, but are not limited to:
 1. On the Anti-Defamation League website, on a statement published August 14, 2017, the Anti-Defamation League stated, "There are significant differences between what happened in Charlottesville and what's scheduled for Boston. Unlike Charlottesville, the Boston event, as currently planned, is not a white supremacist gathering. It has been organized under the auspices of the alt lite, which embraces civic nationalism, rather than the alt right, which advocates white nationalism." The ADL statement continued, "The exception in this case is scheduled speaker Augustus Invictus, who was actively involved in the Charlottesville planning and works closely with the alt right." But the website was updated to read, "Augustus Invictus reports he was 'uninvited' by rally organizers and does not plan to attend." After that, Mayor Marty Walsh knew that nobody associated with the planning and organizing of the Charlottesville event had anything to do with the planning and organizing or were invited speakers at the Boston Free Speech Rally.

2. In information available and known to Mayor Marty Walsh, the Anti-Defamation League provided the following biographies of planned speakers, published on their website on August 13th:

- **“Brandon Navon** is a software engineer who has lived in Massachusetts and New Hampshire. In 2013, he ran for City Council in Lowell, Massachusetts during the preliminary election but was eliminated after finishing in the 21st spot out of 22 candidates. He has identified as a libertarian and attended the Libertarian Party’s nation convention in 2016. In the 2012 presidential campaign, he was a Ron Paul delegate. On his Facebook page, Navon propagates the conspiracy theory that DNC staffer Seth Rich was murdered for political reasons.”
- **Dina Hollister** is the administrator of the Proud Boys’ Girls Facebook page (where women gather to support and talk about Proud Boys). The Proud Boys' motto is: "We are Western chauvinists who refuse to apologize for creating the modern world. The West is Best."
- **Jeremy Herrell** is an ardent Trump supporter based in New Hampshire. In videos, he rails against liberals and progressives. He describes himself as “the Hip Hop Patriot” and has produced two songs: “Build the Wall” and “MAGALikeamofo.” Herrell has been interviewed on Facebook by The Red Elephants, a fledging news organization that attempts to unite all Trump supporters across the spectrum (mainstream, anti-government, alt lite and alt right), seeking to recapture the “like-minded collaboration there once was during President Trump’s campaign.” He broadcasts a live-streaming show on Facebook called “Live in America,” where he discusses politics. On Facebook, Herrell has been promoting MOAR, or the Mother of all Rallies, a pro-Trump event scheduled for September 16, 2017 in Washington, D.C.
- **Joe Biggs** was a contributor to Alex Jones’s InfoWars until he left in 2016 to “pursue other interests.” While working with Jones, Biggs was one the chief promulgators of the “Pizzagate” conspiracy theory, which imagined a child sex trafficking ring out of the basement of a Washington, D.C. pizzeria. Biggs is currently the Chief Operating Officer at Rogue Right Media, which publishes “news” stories about subjects ranging from the low-testosterone epidemic plaguing American men (also one of Jones’s favorite topics) to periodic “censored news” updates on “stories the mainstream media is hiding from you.”
- **Kyle Chapman**, also known as Based Stick Man or the Alt Knight, gained hero status in the world of right-wing activism

when, armed with a stick and wearing a helmet, he confronted anti-fascist (antifa)[sic, Antifa] demonstrators in Berkeley. He has called on members of his recently formed group, the Fraternal Order of the Alt Knights, (described as the “military wing” of the Proud Boys), to battle left-wing groups.

- **Shiva Ayyadurai** is an Indian-born American scientist and a Boston-area political neophyte who has for many years made a widely disputed claim that he invented e-mail. In March 2017, he formerly declared his intention to run for the United States Senate in 2018 and is a favorite on the far right.

14. Not only was this analysis by the Anti-Defamation League up and published on August 13, 2017, it had been widely repeated in numerous media outlets—Mayor Marty Walsh knew of this information when he made slanderous, libelous, or otherwise defamatory statements.

- Even on August 13, 2017, well before the Boston Free Speech Rally of August 19th, on Boston News 7, WHDH, it was reported both on the Internet and on television, that the organizers of the Boston Free Speech Rally had said, ““Libertarians, conservatives, traditionalists, classical liberals, Trump supporters or anyone else who enjoys their right to free speech are encouraged to attend.”” — Mayor Marty Walsh knew of this information when he made slanderous, libelous, or otherwise defamatory statements.
- On August 13, 2017, whdh.com reported that on Facebook, the organizers of the Boston Free Speech Rally wrote in widely reported statements, “In light of the recent attacks on the 1st Amendment of the U.S. Constitution, the New Free Speech Movement is gathering again in Boston to reassert their right to the most basic necessity of civil society. Libertarians, conservatives, traditionalists, classical liberals. Trump supporters or anyone else who enjoys their right to free speech are encouraged to attend.” — Mayor Marty Walsh knew of this information when he made slanderous, libelous, or otherwise defamatory statements⁵.
- On August 13, 2017, Boston Free Speech had a Facebook post which read, “We are not in any way associated with the organizers of the Charlottesville rally. This was a lie and blatant attempt at defamation by Brian Fallon on twitter. There has been threats made against our lives already and we will be contacting Boston

⁵ <http://whdh.com/news/we-dont-want-them-here-mayor-walsh-wants-free-speech-organizers-to-stay-away/>

1 PD.” —Mayor Walsh knew of this information when he made slanderous,
2 libelous, or otherwise defamatory statements.

- 3 d. On Monday, August 14, WWLP, 22 News also reported the statements of the
4 Boston Free Speech organizers, reporting, “Saturday’s rally is billed as the
5 Second Boston Free Speech Rally. On Facebook, the group Boston Free Speech
6 denied association with the Unite The Right group involved in the Virginia rally
7 that led to violent confrontations. ‘We are not in any way associated with the
8 organizers of the Charlottesville rally,’ the group posted to Facebook. The post
9 continued, ‘There has been threats made against our lives already and we will be
10 contacting Boston PD.’” —Mayor Marty Walsh knew of this information when he
11 made slanderous, libelous, or otherwise defamatory statements.
- 12 e. On August 15, 2017, Boston Free Speech had a Facebook post, “This Free Speech
13 Movement is dedicated to peaceful rallies and are in no way affiliated with the
14 Charlottesville rally on 8/12/17. While we maintain that every individual is
15 entitled to their freedom of speech and defend that basic human right, we will not
16 be offering our platform to racism or bigotry. We denounce the politics of
17 supremacy and violence. We denounce the actions, activities, and tactics of the
18 so-called Antifa movement. We denounce the normalization of political violence.

19 We are witnessing an unprecedented move towards sweeping censorship that
20 undermines our democratic system. We are witnessing increasingly regular
21 incidents of political violence being used to silence political opponents. We are
22 witnessing our social media and online communities purging both progressive and
23 conservative content from their networks. We oppose all instances of censorship.
24 We believe that the way to defeat and disarm toxic ideas and ideologies is through
25 dialogue and reason, and that attempting to silence any voice by force of mob or
26 force of law only empowers the radical elements of society and divides us.

27 There is a lot of misinformation in the media slandering our name by likening our
28 organization to those that ran the Charlottesville rally. THIS COULD NOT BE
FURTHER FROM THE TRUTH! “I can tell you the march we had in May... That
group pulled a permit, they worked very well with us” as stated by Boston Police
Commissioner William Evans in a press conference Monday (8/14/17)

We are a coalition of libertarians, progressives, conservatives, and independents
and we welcome all individuals and organizations from any political affiliations
that are willing to peaceably engage in open dialogue about the threats to, and
importance of, free speech and civil liberties. Join us at the Parkman Bandstand
where we will be holding our event. We look forward to this tide-changing
peaceful event that has the potential to be a shining example of how we, in the
city of Boston, can come together for the common goal of preserving freedom of
speech for all and respectfully discussing our differences of opinion without
engaging in violence—Mayor Walsh knew of this information when he made
slanderous, libelous, or otherwise defamatory statements.

- 1 f. On the “Boston Free Speech” Facebook page, on August 18th 2017, there was a
2 post: “There are rumors that a KKK chapter will plan to attend the free speech
3 rally this Saturday uninvited. We remind everyone that we are committed to a
4 peaceful rally and will not allow anyone to attend if they plan to antagonize
5 anyone or display inflammatory imagery. If we are made aware, at any time, that
6 hate groups are attending our rally we will ask them to exercise their free speech
elsewhere. We reserve the right to dismiss anyone we deem antagonistic within
our event...” —Mayor Marty Walsh knew of this information when he made
slanderous, libelous, or otherwise defamatory statements.
- 7 g. The day before the Boston Free Speech Rally, August 18, 2017, NBC News (the
8 national) had reported, “John Medlar, one of the organizers, has told multiple
9 media organizations that the rally is not intended for white supremacists, neo-
10 Nazis or members of the Ku Klux Klan and has made it clear that the ‘Boston
11 Free Speech Rally’ is not for those who attended the protests in Charlottesville.
12 He also claimed the event was for liberals and posted an email he wrote on
Facebook that seems to indicate he invited Black Lives Matter’s Boston chapter to
send a speaker.”⁶ —Mayor Marty Walsh knew of this information when he made
slanderous, libelous, or otherwise defamatory statements.
- 13 h. The day before the rally, on Friday August 18, Fox News reported, “A Boston
14 free-speech member claimed on Facebook that he invited a BLM member to
15 speak.”—Mayor Marty Walsh knew of this information when he made
slanderous, libelous, or otherwise defamatory statements.
- 16 i. WBUR also reported, on Friday, August 18, 2017, “Event organizer John
17 Medlar says he has invited left-wing speakers from groups like Black Lives
18 Matter to take part -- without much success so far.” —Mayor Marty Walsh knew
19 of this information when he made slanderous, libelous, or otherwise defamatory
statements.
- 20 j. The day before the rally, the public radio station WGBH did a piece, which
21 appears on their website, “Boston 'Free Speech Rally' Organizer John Medlar
22 Talks Motive And Goals,” with a transcript that appears on their website and was
published August 18, 2017. Statements of one of the event organizers, John
Medlar stated:
- 23 i. “[T]he alt-right and the alt-light so-called factions don't
24 particularly like each other. The alt-light see themselves as mostly
25 pro-Western but don't have a racial agenda, whereas the alt-right is
26 more of a white identity movement.”

27 ⁶ [https://www.nbcnews.com/news/us-news/after-charlottesville-thousands-](https://www.nbcnews.com/news/us-news/after-charlottesville-thousands-expected-attend-boston-counter-protests-right-wing-n793756)
28 [expected-attend-boston-counter-protests-right-wing-n793756](https://www.nbcnews.com/news/us-news/after-charlottesville-thousands-expected-attend-boston-counter-protests-right-wing-n793756), retrieved
September 21, 2017.

1 ii. At one point in the WGBH interview, John Medlar makes clear
2 that white supremacist were not invited to attend:

- 3 1) **John Medlar:** We did have a lot of people reach out to us
4 and so we talked with them and ... if, you know, we felt like
5 they would be an interesting person to have at our rally
6 who presented a unique point of view, then we extended
7 the invitation to them.
8 2) **Joe Mathieu:** Would white supremacy be among those
9 points of view?
10 3) **John Medlar:** The problem with white supremacy is
11 that they don't extend the same rights to other people.
12 They're happy to use the First Amendment as a shield to
13 protect themselves, but they ... but because they're
14 supremacists, they don't extend the same rights to people of
15 color. And we believe that, you know, the Constitution
16 applies to everyone.

17 iii. At one point in the August 18, 2017 WGBH interview, WGBH
18 actually poses the question that perhaps the Boston Free Speech
19 Rally is not really about free speech since white supremacist were
20 not allowed to speak.

- 21 1) **Joe Mathieu:** Is that a fair point of view or not? Is it fair to
22 suggest that you're not open to free speech if you're not
23 having white supremacists there?
24 2) **John Medlar:** I think that ... well we defend the free
25 speech of everyone, but with free speech also comes
26 freedom of association.
27 3) **Joe Mathieu:** Will there be any racist speakers on
28 Saturday?
1 4) **John Medlar:** We don't believe that any of our speakers
2 are racist. Again, that's another term that gets thrown
3 around out there. The most ... the most controversial views
4 that ... at least ... as what as far as race is concerned, the
5 most controversial views we've mostly heard from people
6 say, like Kyle Chapman or Augustus Invictus, is that
7 bigotry against white people is also wrong, in addition. And
8 we think that bigotry against anybody is wrong—Mayor
9 Marty Walsh knew of this information when he made
10 slanderous, libelous, or otherwise defamatory statements.

11 15. Mayor Marty Walsh had Boston engage in a massive expenditure of resources, engaging
12 in self-serving scare tactics to cause the general public to believe that the following
13 libelous or slanderous statements were true:
14

- a. White supremacist and/or members of hate groups were coming to Boston to be speakers at the Boston Free Speech Rally at the invitation of the organizers of the Boston Free Speech Rally.
- b. White supremacist and/or members of hate groups were invited by the event organizers to come and participate in the Boston Free Speech Rally as attendees.
- c. That white Supremacist and/or members of hate groups would attend the Boston Free Speech Rally.
- d. The organizers of the Boston Free Speech Rally themselves where white supremacist, members of a hate group, and/or were haters and/or bigots.

16. In fact, the truth was:

- a. No white supremacist and/or members of hate groups were to come to Boston to be speakers at the Boston Free Speech Rally at the invitation of the organizers of the Boston Free Speech Rally. (Moreover, no such hate groups did come.)
- b. No white supremacist and/or members of hate groups were invited by the event organizers to come and participate in the Boston Free Speech Rally as attendees.
- c. No openly white supremacist and/or member of hate groups attended the Boston Free Speech Rally. Certainly, no white supremacist group or hate group attended as a group.
- d. The organizers of the Boston Free Speech Rally themselves where *not* white supremacist, nor were they members of a hate group, nor were they haters or bigots.

17. Despite fully knowing that no hate groups were invited to attend, despite knowing that the organizers were not white supremacist or haters (or at the very best made with reckless disregard for the truth thus meeting the “actual malice” standard of *Times v. Sullivan*, 376 U.S. 254 (1964)), purely out of malice and political gain, Boston Mayor Marty Walsh made the following libelous with full knowledge of their falsity (or at minimum recklessness), including:

- a. On Saturday, August 12, 2017, Boston Mayor Marty Walsh stated at an event, “There's no place for the hate that they're spewing,” Mayor Walsh also said at that Saturday, August 12, 2017 event, “It's my understanding that they're scheduled to come to Boston. I know we probably can't stop it because of free speech, but they're spewing hate. We don't need that right now in our country.” The comments were obviously directed at the Boston Speech Rally organizers and expected speakers and the Mayor was characterizing them as members of hate groups.

- 1 b. On Saturday, August 12, 2017, Boston Mayor Marty Walsh during his
2 aforementioned interview with WCVB5, also said, "The whole premise behind
3 what they're doing there—the white supremacist group and the neo-Nazis, I don't
4 quite understand what their message is." The comments were obviously directed
5 at the Boston Speech Rally organizers and expected speakers and the Mayor was
6 characterizing them as "white supremacist" and "neo-Nazis."
- 7 c. On August 21, 2017, two days after the Boston Free Speech Rally and with full
8 knowledge the speakers were not white supremacist and even chanted "love, love,
9 love" and "black lives matter," Mayor Marty Walsh still said, as reported by the
10 Boston Herald, that white supremacists did take part in the rally that drew 40,000
11 counter-protesters to drown out their voices.⁷ The comments were obviously
12 directed at the Boston Speech Rally organizers and the speakers that appeared,
13 and the Mayor was characterizing them as white supremacist.
- 14 d. Mayor Marty Walsh, just hours before the Boston Free Speech Rally on August
15 19, 2017, said "This is a potentially very important moment in time for our
16 country here in Boston, Massachusetts to push back on some of the rhetoric and
17 the hate, the anti-Semitism and the racism that's being talked about and going on
18 in our country. I think Boston can start to turn that tide."⁸ The local Boston CBS
19 television station reported this. The comments were obviously directed at the
20 Boston Speech Rally organizers and expected speakers and the Mayor was
21 characterizing them as members of hate groups.
- 22 e. In a Tweet, hours before the Boston Free Speech Rally on August 19, 2017, at
23 8:17 AM, Marty Walsh tweeted, "I ask everyone to be peaceful today and respect
24 our City. Love, not hate. We stand together against intolerance." This tweet was
25 picked up by media outlets. The comments were obviously directed at the Boston
26 Speech Rally organizers and expected speakers and the Mayor was characterizing
27 them as members of hate groups.
- 28 f. In a Tweet, after the Boston Free Speech Rally on August 19, 2017, at 2:00 PM,
Marty Walsh tweeted, "Today Boston showed there's no place for hate in our
City." The comments were obviously directed at the Boston Speech Rally
organizers and expected speakers and the Mayor was characterizing them as
members of hate groups.
- g. In an interview reported by New York Magazine, titled "The Boston Rally
Exposed the Left's Intolerance of Free Speech", the mayor, Marty Walsh,
shrugged: "Why give attention to people spewing hate?" Mayor Marty Walsh did

⁷ Boston Herald, "Despite outcry from pols, rally participants say they're not racist," published Monday, August 21, 2017.

⁸ Reported in <http://boston.cbslocal.com/2017/08/19/boston-free-speech-rally/>, retrieved Thursday, September 21, 2017.

1 say, “Why give attention to people spewing hate?” and this quote was accurately
2 quoted. The comments were obviously directed at the Boston Speech Rally
3 organizers and expected speakers and the Mayor was characterizing them as
“spewing hate.”

4 h. On August 19, 2017, the day of the Boston Free Speech Rally, Mayor Marty
5 Walsh tweeted at 2:27 PM, “Today, Boston stood for peace and love, not bigotry
6 and hate. We should work to bring people together, not apart.” (He was replying
7 to President Trump’s Tweet.) This tweet was picked up by media outlets. The
8 comments were obviously directed at the Boston Speech Rally organizers and
expected speakers and the Mayor was characterizing them as members of hate
groups.

9 i. On August 19, 2017, at 8:17 AM the day of the Boston Free Speech Rally, Boston
10 Marty Walsh stated, “I ask everyone to be peaceful today and respect our City.
11 Love, not hate. We stand together against intolerance.” The comments were
obviously directed at the Boston Speech Rally organizers and expected speakers
and the Mayor was characterizing them as members of hate groups and intolerant.

12 j. On Friday, August 18, 2017, the day before the Boston Free Speech Rally, Mayor
13 Marty Walsh WBZ news reported “The mayor said he has spoken with the
14 Southern Poverty Law Center for guidance on how to handle events involving
15 white supremacists.” While this is not a direct quote, it is hereby averred that this
16 was an accurate assertion of what the Mayor said at a press conference on Friday,
17 August 18, 2017. The comments were obviously directed at the Boston Speech
Rally organizers and expected speakers and the Mayor was characterizing them as
members of hate groups.

18 k. Mayor Marty Walsh (as reported by WBZ), stated in a press conference on
19 Friday, August 18, 2017, “They [the Southern Poverty Law Center] say that
20 interacting with these groups just gives them a platform to spread their message of
21 hate.” The comments regarding “these groups” were obviously directed at the
Boston Speech Rally organizers and expected speakers and the Mayor was
characterizing them as members of hate groups with a “message of hate.”

22 l. On Friday, August 18, 2017, Boston Mayor Marty Walsh tweeted, “We’ll return
23 hate with love. And we will stand together for peace and unity -- always.
24 #OutOfMany1.” “Hate” was a reference to the event organizers and expected
speakers.

25 m. On Friday, August 18, 2017, Boston Mayor Marty Walsh tweeted, “We have to
26 support those that are targeted, and stand together in unity.” The comments were
27 obviously directed at the Boston Speech Rally organizers and expected speakers
and the Mayor was characterizing them as “targeting” other individuals.

28 n. On Friday, August 18, 2017, Boston Mayor Marty Walsh tweeted, at 9:48 AM,
“Hatred and intimidation are not welcome in Boston or the Commonwealth.”

- 1 o. On August 17, 2017, Mayor Marty Walsh tweeted, "Hatred and intimidation are
2 not welcome in Boston or the Commonwealth." The comments were obviously
3 directed at the Boston Speech Rally organizers and expected speakers. This tweet
4 was picked up by media outlets.
- 5 p. On Monday, August 14, 2017, the AP reported, "Boston Mayor Martin Walsh
6 said Monday that the city stands with Virginia and will not welcome what he
7 described as 'hate groups' who might be thinking of holding a rally in Boston."
8 The comments were obviously directed at the Boston Speech Rally organizers and
9 expected speakers and the Mayor was characterizing them as members of hate
10 groups.
- 11 q. On Monday, August 14, 2017, Mayor Marty Walsh said at a press conference on
12 Boston City Hall Plaza, "We also have a message for the hate groups, especially
13 any who are planning to come to our city this weekend: Boston does not welcome
14 you here. Boston does not want you here. Boston rejects your message." The
15 comments were obviously directed at the Boston Speech Rally organizers and
16 expected speakers and the Mayor was characterizing them as members of hate
17 groups.
- 18 r. At this press conference on Boston City Hall Plaza on August 14, 2017, Marty
19 Walsh said, "Don't hand hatred a megaphone and pretend you can't hear it,"
20 "Leaders call out hate and reject it before it becomes violence. That's why we're
21 here today. That's why this weekend myself and the governor spent nearly about
22 10 or 15 different phone calls talking about how do we reject hate in the
23 commonwealth and the city of Boston." The comments were obviously directed at
24 the Boston Speech Rally organizers and expected speakers and the Mayor was
25 characterizing them haters.
- 26 s. On August 14, 2017, at a 1:00 PM conference, Boston Mayor Marty Walsh was
27 quoted as saying, in an article "Mayor Walsh urges 'free speech' ralliers [sic rally
28 attendees] to stay away after Virginia violence" published by
Saugus.wikedlocal.com, which read, "'Don't hand hatred a megaphone and
pretend you can't hear it,' Walsh said at a press conference on City Hall plaza
surrounded by a diverse group of civic leaders. 'Leaders call out hate and reject it
before it becomes violence. That's why we're here today. That's why this
weekend myself and the governor spent nearly about 10 or 15 different phone
calls talking about how do we reject hate in the commonwealth and the city of
Boston.'" The comments were obviously directed at the Boston Speech Rally
organizers and expected speakers and the Mayor was characterizing them not only
as haters, but haters on the brink of violence.
- t. On August 14, 2017, at 5:00 PM, Boston Mayor Marty Walsh tweeted, "Today &
every day Boston stands up against hate. I'm saddened to see such a despicable
action in this great city. (1/2)" The comments were obviously directed at the
Boston Speech Rally organizers and expected speakers and the Mayor was
characterizing them as haters.

- 1 u. On August 14, 2017, at 5:00 PM, Boston Mayor Marty Walsh tweeted at 12:27
2 PM, a photo of himself at a microphone captioned with his statement, “Don’t
3 hand hatred a microphone and pretend you don’t here it,” which were uttered the
4 same day. The comments were obviously directed at the Boston Speech Rally
5 organizers and expected speakers and the Mayor was characterizing them as
6 haters.
- 7 v. Mayor Marty Walsh said on August 13, 2017, the day after the Charlottesville
8 tragedy, “We don’t need this type of hate,” “So my message is clear to this group.
9 We don’t want you in Boston. We don’t want you on Boston Common. We don’t
10 want you spewing the hate that we saw yesterday, and the loss of life.” The
11 comments were obviously directed at the Boston Speech Rally organizers and
12 expected speakers and the Mayor was characterizing them as haters.
- 13 w. On August 13, 2017, Boston Mayor Marty Walsh said on Twitter at 3:54 PM,
14 “Boston is an inclusive place for all. Hate will not be tolerated in our City.”
15 Attached is an article local Boston.localcbs.com, which is titled, “We don’t want
16 you: Walsh warns of planned Boston Free Speech Rally.” The comments were
17 obviously directed at the Boston Speech Rally organizers and expected speakers
18 and the Mayor was characterizing them as haters.
- 19 x. On August 12, 2017, Boston Mayor Marty Walsh tweeted, “Boston is an inclusive
20 place for all. Hate will not be tolerated in our City.” Beneath the tweet Mayor
21 Marty Walsh put a link to the CBS Boston news piece, “‘We Don’t Want You,’
22 Walsh Warns Ahead Of Planned Boston Free Speech Rally” so it is clear that the
23 comments were directed to organizers, speakers and participants of the Boston
24 Free Speech Rally.
- 25 y. On Saturday, August 12, 2017, Boston Mayor Marty Walsh had an interview with
26 WCVB5 and said, “There is no place in Boston for that type of hate.” The
27 comments were obviously directed at the Boston Speech Rally organizers and
28 expected speakers and the Mayor was characterizing them as members of hate
groups.
18. In the alternative, the above statements constituted libel under Massachusetts common
law, the statements were made negligently, and Mr. Brandon Navom is not a “public
figure” under the *Times v. Sullivan* standard.
19. Mayor Marty Walsh’s libelous statements were large and substantial statements
mischaracterizing the organizers, speakers, and invited attendees as white supremacist,
haters, or members of hate groups—these were not “minor inaccuracies.”
20. As can be seen, Boston Mayor Marty Walsh had been closely monitoring the organizers
of the Boston Free Speech Rally, their invited speakers, and their invited guest.
21. Despite knowing that the organizers, the invited speakers, and the invited guest were not
white supremacist, neo-Nazis, or haters through he and his staffs careful monitoring of
social media and media outlets for information on the Boston Free Speech organizers,

1 speakers and invited guest, Mayor Marty Walsh repetitiously maliciously stated the
2 organizers and their planned guest were white supremacist, neo-Nazis, or members of
3 hate groups.

4 22. While Brandon Navom is not a public figure, Mayor Marty Walsh meets the standard
5 articulated in *New York Times v. Sullivan* by making defamatory statements that he knew
6 were not true, or in the alternative showed a reckless disregard for the truth.

7 23. Mayor Marty Walsh's comments were also malicious in the sense that he patently made
8 them for political gain.

9 24. Mayor Marty Walsh was anticipating an upcoming political campaign in the fall, and
10 used these fabrications of the organizers and speakers being "white supremacist,"
11 "haters," "neo-Nazis" or members of groups that "hate," for photo-ops that portrayed him
12 as a social justice knight attacking white supremacy, anti-Semitism, hate and racism
13 as putatively manifested by the organizers of the Boston Free Speech Rally (such as
14 myself) and the invited speakers.

15 25. I am not a white supremacist; I have never been a member of any hate group; I am not a
16 racist or hold bigoted ideas regarding race, gender, national origin, or sexual orientation.

17 26. I suffered tremendous damages because of Mayor Marty Walsh's defamation including:

- 18 a. Loss of my software-consulting job because of Mayor Marty Walsh's defamatory
19 comments. .
- 20 b. Being called a hater, a member of a hate group, a white supremacist, and a Nazi
21 on the Internet and being cyber-bullied, because of Mayor Marty Walsh's
22 defamatory comments.
- 23 c. Being repetitiously called a hater, a member of a hate group, a white supremacist,
24 and a Nazi because of Mayor Marty Walsh's defamatory comments.
- 25 d. Receiving threats to "expose me" for made-up racism because of Mayor Marty
26 Walsh's defamatory comments.
- 27 e. Terrible horrible things have been said about me online because of the Mayor's
28 comments, which have caused me fear and anxiety because of Mayor Marty
Walsh's defamatory comments.
- f. My reputation has been ruined and I will suffer emotional and economic loss the
rest of my life because of Mayor Marty Walsh's high news profile defamatory
comments and the defamatory comments in his twitter feed.
- g. I was subjected to an Internet hate mob which tracked me down and harassed my
employer until they let me go simply because my name was on the list of
speakers—injuries that I suffered because of Mayor Marty Walsh's defamatory
comments.

1 h. This Internet hate mob exposed my personal information, including my home
2 address, and said they were going to send people to my house, because of Mayor
3 Marty Walsh's defamatory comments.

4 i. I received all sorts of threats caused by the hatred engendered because of Mayor
5 Marty Walsh's defamatory comments.

6 27. I ask for \$50 million in actual damages, \$50 million in punitive damages, attorney fees,
7 cost, a declaration that Mary Walsh's statements were and remain false and defamatory,
8 and any other relief that is just and reasonable.

9 Submitted by his attorney,

10 Dated 10/23/17
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