

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT  
IN AND FOR ST. JOHNS COUNTY, FLORIDA  
Civil Division

MICHAEL T. FLYNN, )

*Plaintiff,* )

v. )

EVERETT STERN )  
243 Falcon Ridge Road )  
St. Augustine, Florida 32084 )

*Defendant.* )

Case No.: CA23-2052

COMPLAINT

Demand for a Jury Trial

1. Defendant Everett Stern is a fabulist grifter who poses as an intelligence operative—calling himself the “Intelligence Director” of his own “private CIA,” despite having no military, intelligence, or law enforcement experience—who spreads lies on the internet about prominent companies and public figures to drive up his social media engagement and generate income for his company. His targets have included HSBC and Senator Pat Toomey. Defendant appears to be particularly obsessed with smearing Lt. Gen. Michael T. Flynn, U.S. Army (ret.) (“General Flynn”), a decorated American hero.

2. From January 6, 2023, to present, Defendant has posted on X (formerly Twitter) about General Flynn no fewer than 175 times and has published multiple podcasts and videos repeating his smears. Defendant lies about General Flynn *ad nauseam*, accusing him of blackmail, extortion, treason, and of being part of a domestic terrorism plot. Defendant’s newest smear is to accuse General Flynn of

making threats against his family and being involved in a supposedly criminal enterprise, stealing credit card and financial information.

3. General Flynn now seeks to hold Defendant accountable for his malicious and knowing lies.

### **Parties**

4. Lt. Gen. Michael T. Flynn, U.S. Army (ret.) is an individual who is a citizen of Florida and resides in Sarasota County.

5. Defendant Everett Stern is an individual who is a citizen of Florida and resides in St. Johns County.

### **Jurisdiction & Venue**

6. This Court has subject matter jurisdiction over this cause of action pursuant to Fla. Stat. § 26.012 as it is a civil action with damages exceeding \$50,000.

7. Venue for this action is properly in St. Johns County, Florida as Defendant resides in St. Johns County.

### **Factual Background**

#### **Background of General Flynn**

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8. General Flynn has dedicated his life to serving and protecting the United States. He served more than thirty-three (33) years in the United States Army, rising to the rank of Lieutenant General.

9. On April 17, 2012, President Barack Obama nominated General Flynn as the Director of the Defense Intelligence Agency (“DIA”), and the United States Senate subsequently confirmed that appointment. In this role, General Flynn was

responsible for overseeing the DIA's mission to provide military intelligence to warfighters, defense policymakers, and force planners in the Department of Defense and the United States' broader Intelligence Community in support of United States military planning and operations and weapon systems acquisition.

10. General Flynn served as DIA Director until stepping down from that role on August 7, 2014, and subsequently retiring from the Army on September 30, 2014. Admiral Mike Rogers, then the director of the NSA, praised General Flynn as “the best intelligence officer of the past 20 years.”

11. In 2016, General Flynn became a foreign policy advisor to then-Republican presidential candidate Donald J. Trump. General Flynn continued to serve in this role through the election and on the transition team when it was announced that he would be incoming President Trump's selection for National Security Advisor (“NSA”).

12. In the leadup to the 2016 election, the FBI targeted General Flynn because of his affiliation with President Trump. Shortly after the election, although there was no basis for investigating General Flynn, much less President Trump, the FBI sent two agents to interview General Flynn about a conversation he had with Russian Ambassador Kislyak. The FBI possessed the transcript and knew that there was nothing problematic about the call, and General Flynn's statements about the call—weeks later, and in the middle of the transition when he was having multiple conversations with foreign diplomats—were vague, and only arguably false. Despite

this, General Flynn was charged with lying to the FBI. He initially agreed to plead guilty only after the DOJ threatened his son with prosecution.

13. Prior to sentencing, however, General Flynn became aware of improperly withheld *Brady* material that showed his innocence—particularly internal FBI documents showing that there was no basis to conduct the interview as the FBI had already cleared General Flynn of connections with Russia, a handwritten note of FBI Assistant Deputy Director Bill Priestap indicating that the real purpose of the interview was not to get to the truth but to “get [Flynn] to lie,” and notes of the interviewing agents showing that they thought General Flynn believed he was telling the truth. Put simply—and as the DOJ recognized in its motion to dismiss the charge, fully vindicating General Flynn—nothing that he said during the interview, even if false, could possibly have been material to any investigation, and they had no evidence of an intentional misstatement.

14. After years of wrongful prosecution by the FBI and DOJ, crushing legal bills, and finally clearing his name, General Flynn has returned to public life as a staunch advocate for the preservation of American values and election integrity, and the fight against human trafficking.

*Defendant’s history of fabrications and targeting of General Flynn*

15. Defendant made a name for himself by repeatedly—and falsely—claiming to be the HSBC “whistleblower” whose insider “intelligence” caused HSBC to be fined \$1.92 billion in 2012.

16. In reality, Defendant was nothing more than an entry-level associate, straight out of school, who worked at HSBC for one year. He had nothing to do with the HSBC investigation, which entirely predated his employment. Defendant admitted this in a “Government Submission” he filed with the Federal Reserve in his first attempt to smear a prominent company and boost his own public profile.

17. Defendant fabricated a public persona as the whistleblower who took down HSBC, including the idea that he worked with the CIA to do so. He titled himself the “Intelligence Director” of his company, which he advertised as a “Private Intelligence Agency” and “the real Private CIA,” that conducts “intelligence operations,” and utilizes “CIA intelligence methodologies and tradecraft.”

18. Defendant has parlayed his HSBC lies into media appearances and interviews—portraying himself as a private spy who dismantled terrorist financing operations—a book, and several runs for political office, including seeking the Republican nomination for U.S. Senate in Pennsylvania. Indeed, Defendant has publicly stated his intent to run for U.S. Senate again in 2024, this time as a Democrat in Florida. While Defendant has never won an election or primary, or even come close, he utilizes these failed runs as credentials—like his supposed credential as a “whistleblower”—to pad his resume, sell books, and attract business to his “Private Intelligence Agency.”

19. Over the years, Defendant has shown a pattern of making outrageous and unsubstantiated allegations to attract headlines and attention, and to generate business for his company.

20. On October 30, 2021, Defendant publicly began such a campaign against General Flynn, holding a “press conference” at which he made outrageous and false allegations that General Flynn was involved in a domestic terrorism plot and that General Flynn was “committing treason against the United States.”<sup>1</sup>

21. In his written YouTube post that accompanied the video of this “press conference,” Defendant proclaimed himself to be “considered a hero by many” and once again repeated the lie that he was “the HSBC whistleblower who, in 2012, uncovered evidence that his employer HSBC was laundering money for several major international terrorist and drug cartel financing operations around the world” and that his “whistleblowing actions resulted in a \$1.92 billion fine.”<sup>2</sup>

22. In the press conference, and in subsequent statements, Defendant fabricates a story about two supposed “Flynn Operatives” he met at a political rally who tried to recruit him into a blackmail and extortion scheme to dig up dirt on Pennsylvania politicians and pressure them into supporting election audits, and that they would accomplish this “mission” by use of “domestic terrorism.” He went on to claim that he was required to pass a “test” by giving a speech at a Lancaster, Pennsylvania event, before they would fully trust him and provide him with “targets.”

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<sup>1</sup> Everett Stern, *New Evidence of Ongoing Domestic Terror Threat Links to General Michael T. Flynn*, YOUTUBE (Oct. 30, 2021), <https://www.youtube.com/watch?v=0hJxwENx468>.

<sup>2</sup> It is noteworthy that 2012 was a year after Defendant had already left HSBC.

23. Defendant's story was false in every material respect. While Defendant did meet two grassroots activists at the rally, Velma Ann Ruth and Mark Still, they did not work for and never claimed to work for General Flynn. Ruth was wearing a "★★★ General Flynn #JusticeForAll" tank-top and baseball cap, as depicted below.<sup>3</sup> At some later point, Defendant also met a man named Ivan Raiklin, who Defendant falsely claims is General Flynn's attorney. Raiklin is not and has never been an attorney for General Flynn, nor is General Flynn affiliated with him.



24. Ruth and Still never tried to recruit Defendant for anything. Quite the contrary, after meeting them at the Republican event and exchanging information, Defendant called Ruth, aggressively trying to sell her on the services of his “private

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<sup>3</sup> Given that Defendant described the tank top as “paramilitary gear” and a “paramilitary uniform,” it is unsurprising that he would also falsely claim that a person wearing a t-shirt in support of General Flynn was a “Flynn Operative.”

intelligence agency.” He made allegations of corruption about Senator Pat Toomey and Congressman Brian Fitzpatrick, involving campaign finance and donations from financial institutions, which Ruth and Still believed were irresponsible and inflammatory.<sup>4</sup> Because Defendant was then running in the Republican primary for U.S. Senate, Ruth was worried about him making unsubstantiated accusations publicly, so she agreed to meet with him at an upcoming event in Lancaster to hear him out and try to assuage his concerns. Prior to the meeting, Ruth performed her own research on Defendant’s allegations, confirming her initial reaction that they lacked merit.

25. In the interim, Defendant messaged with Ruth in a paranoid and nervous tone, asking about “targets,” demanding to know the identity of other participants in group texts, and asking to meet in person. Contrary to his claim of being required to give a speech in Lancaster to pass a “test,” the text messages show that Defendant *asked Ruth for permission* to give a speech in Lancaster. She

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<sup>4</sup> Defendant has a long history of making such allegations about Senator Toomey, although Ruth and Still were not aware at the time. During the 2016 Pennsylvania primary for U.S. Senate, Defendant authored a petition, calling for the resignation of Senator Toomey and accusing him of “Continuing Ethics Violations”. Everett Stern, *Petition: The Resignation of Senator Pat Toomey*, CHANGE.ORG, archived at INTERNET ARCHIVE WAYBACK MACHINE (last visited Nov. 3, 2023), *available at* <https://web.archive.org/web/20220324075509/https://www.change.org/p/u-s-senate-the-resignation-of-senator-pat-toomey>. Defendant—who identified himself in the petition as “United States Senate Candidate” and “the HSBC Whistleblower”—suggested that Senator Toomey accepted campaign contributions from HSBC as a corrupt *quid pro quo* for lenience in the government investigation of HSBC and implied a connection between Senator Toomey and terrorist financing. In 2017, Defendant sat for an interview with Russia Today, in which he claimed that he was going to “throw [Senator Toomey] in jail for being a traitor to an enemy bank.”



responded that she was not responsible for the event and recommended that he reach out to the organizers. Defendant, unsatisfied, asked Ruth:

*May you please reach out to them for me* or provide the organizers number. It would be an honor to speak and they would like to hear what I have to say. (emphasis added)

Ruth politely declined to speak on his behalf but provided Defendant with the phone number for one of the event organizers. No one invited or asked Defendant to speak.

26. When Ruth met Defendant at the Lancaster event, she advised him that his claims of corruption against Toomey and Fitzpatrick appeared to be unsubstantiated and that the donations they received from financial institutions appeared perfectly legal. She told Defendant that if he did not have evidence of corruption, he should stop making irresponsible allegations, and that if Defendant did substantiate his claims, he should handle the issue more professionally. From that point on, Ruth ceased contact with Defendant.

27. At no point did Ruth, Still, or anyone affiliated with them or their grassroots organization, Patriot Caucus, hire or attempt to hire Defendant or his company. They never provided Defendant with “targets,” never asked him to research or get “dirt” on anyone, and never suggested committing “domestic terrorism.” Moreover, and more importantly, none of this had *anything* to do with General Flynn.

28. In spite of this, Defendant repeated *ad nauseam* his fabrications that General Flynn was involved in a non-existent blackmail, extortion, and domestic terrorist plot, on Twitter, in YouTube videos, and even in a book.

29. In May 2022, General Flynn filed a defamation lawsuit against Defendant in the United States District Court for the Middle District of Florida for

his lies.<sup>5</sup> That lawsuit settled on January 5, 2023. Unfortunately, Defendant has not stopped defaming General Flynn.

*Defendant continues to defame General Flynn after settlement.*

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30. Since January 6, 2023, Defendant has posted on X (formerly Twitter) about General Flynn no fewer than 175 times. Ironically, in his first statement of this post-settlement timeline, Defendant claims that he is “going back off social media.”

31. It did not take long for Defendant to get back on social media and resume his baseless attacks. On January 24, 2023, Defendant stated that he was “desperate to take Flynn down,” and falsely claimed that a “Flynn Operative” told him, “We will accomplish the mission by any means necessary, including the use of domestic terrorism!”:



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<sup>5</sup> *Flynn v. Stern*, No. 8:22-cv-1250-TBS (M.D. Fla., docketed May 31, 2022).

32. Defendant followed that up with another post, calling General Flynn a “real deadly enemy”:



33. On January 28, 2023, Defendant stated that he was preparing for “another fight” with General Flynn, and that “next time I will win”:



34. On February 19, 2023, Defendant stated that he was “livid and beyond angry” about General Flynn receiving a settlement in the prior defamation lawsuit, calling it “disgusting.” He then falsely states that he witnessed crimes for which General Flynn “will go to jail,” including “Domestic Terrorism and interference with our elections!!!”

35. On April 6, 2023, Defendant reposted the full video of his October 31, 2021, press conference, described above, in which he falsely alleged that General Flynn was involved in a domestic terrorism plot and that General Flynn was

“committing treason against the United States” and that he was creating “paramilitary operations” in various states.<sup>6</sup>

36. On June 9, 2023, Defendant falsely stated that General Flynn had conspired to “overturn the 2020 election in favor of Trump through extortion and blackmail.” Defendant also adds on a new lie at this point, falsely asserting that General Flynn “created” the QAnon movement:



37. On June 25, 2023, Defendant falsely stated that he “witnessed the Flynn blackmail extortion plot”:



38. On June 26, 2023, Defendant published a video podcast (the “Podcast”) in which he repeats his fabrication about General Flynn being involved in a blackmail and extortion plot.<sup>7</sup> He then stammers between several conspiracy theories, falsely

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<sup>6</sup> @EverettStern1, X (Feb. 19, 2023, 5:53 p.m.), <https://twitter.com/EverettStern1/status/1627441145356730369>.

<sup>7</sup> Everett Stern, *New intelligence and explanation into General Flynn, Trump, Fmr. FBI Counterintelligence Chief Charles McGonigal*, THE STERN TRUTH PODCAST (Jun.

implying that General Flynn is a traitor and working for Russia. Defendant falsely states that “Flynn was in jail, in federal prison with, with Roger Stone, uh, a couple of guys from Blackwater” and that General Flynn in fact committed the crime of lying to the FBI.

39. On July 7, 2023, Defendant posted a YouTube video clip from the Podcast, which includes his false accusations that General Flynn was involved in a blackmail, extortion, and domestic terrorism scheme<sup>8</sup>:



40. On July 31, 2023, Defendant made new and bizarre allegations, claiming that “[t]he General Flynn situation is escalating rapidly. I am not being left alone by

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26, 2023), available at <https://podcasts.apple.com/us/podcast/the-stern-truth-podcast/id1693400449>.

<sup>8</sup> @EverettStern1, X (Jul. 7, 2023, 8:49 a.m.), <https://twitter.com/EverettStern1/status/1677298725113266176>.

his people.” Defendant then falsely accuses General Flynn of threatening him and his family:



41. On October 12, 2023, Defendant begins a flurry of paranoid and defamatory X posts, each post in reply to the prior post (collectively and colloquially known as a “thread”), falsely alleging without any basis that General Flynn is utilizing a “dangerous group” called the Aracari project to conduct illegal actions “against Americans and Democracy.” **Exhibit 1.** In the thread, Defendant falsely alleges:

- a. that a “Flynn Operative” “posted a target photo of [Defendant’s] wife”;
- b. that Aracari Project is “a Flynn backed organization” that is “running man in the middle operations against Americans stealing credit card information”;
- c. that General Flynn is “using foreign spies to harm American Democracy”;

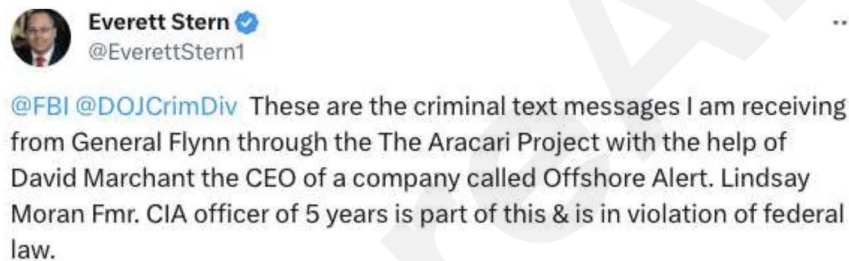
- d. that General Flynn utilized Aracari Project to target, threaten, and attack Defendant's family;
- e. that General Flynn is an "extortionist";
- f. that General Flynn is involved in a "Criminal Collaboration";
- g. that Defendant received "disgusting, threatening, and extortionary text messages" from General Flynn.


42. On October 18, 2023, Defendant posted a lengthy rant on Substack, titled "Criminal Collaboration: General Flynn, Offshore Alert & Aracari Project" in which he repeats the same false allegations about General Flynn as he did in the X thread described above. **Exhibit 2.** In the Substack post, Defendant falsely alleges:

- a. that General Flynn "collaborate[s]" with Aracari Project, which he describes as a criminal organization that "jeopardizes national security" and that this collaboration "constitutes criminal activity";
- b. that General Flynn hired Aracari Project and directed them to post personal photos of Defendant's family members on social media and make "veiled [sic] threats of violence" against them;
- c. that "[t]his partnership between a disinformation agent, a cybercriminal, and a disgraced former general poses a clear threat to the national security of the United States";
- d. that General Flynn threatened "innocent individuals with cyber attacks and disseminating false information".

43. On October 19, 2023, as part of the X thread described above, Defendant posted images of a hostile text message exchange between Defendant and someone who identifies himself as Chris, but whom Defendant addresses as Will. Defendant claims that he received these “threatening” and “extortionary” texts from General Flynn. **Exhibit 3.** The texts are, on their face, not from General Flynn, nor were they sent by anyone affiliated with, on behalf of, or at the direction of General Flynn.

44. On October 20, 2023, Defendant posted on X, directing the message at the FBI and DOJ Criminal Division, falsely claiming that General Flynn sent him “criminal text messages” via the Aracari Project:



**Everett Stern**    
@EverettStern1

[@FBI @DOJCrDiv](#) These are the criminal text messages I am receiving from General Flynn through the The Aracari Project with the help of David Marchant the CEO of a company called Offshore Alert. Lindsay Moran Fmr. CIA officer of 5 years is part of this & is in violation of federal law.



**Everett Stern**  @EverettStern1 · Oct 19  
Replying to @EverettStern1

I am now going to post the disgusting, threatening, and extortionary text messages I have received from The Aracari Project including General Flynn @GenFlynn, Lindsay Moran @LindsayMoran, William B. Ruzich, and Keyson Uteley. I warn everyone that they are disturbing.



The collage shows a text conversation with the following messages:

- Green bubble: "What's the mission here Will"
- Grey bubble: "You will have to ask will"
- Green bubble: "What's mission objective"
- Grey bubble: "But we want you to come to DC and go on capital hill and admit your full of shit"
- Green bubble: "What's the new scam Will"
- Grey bubble: "Haha . Flynn was right about you"
- Green bubble: "How's that Will?"
- Grey bubble: "Let's just clear this up right now ! My name is not will . It's Chris , but Flynn told me that for years you were harassing him on we are watching you you fat fuck lol"
- Green bubble: "That dog if yours people send money"
- Grey bubble: "It is pathetic"
- Green bubble: "What's the new fraud?"
- Grey bubble: "How are your bubble arm threading you"
- Green bubble: "What's the new criminal activity"
- Grey bubble: "Is that was you call those rabbits ?"

11:59 AM · Oct 20, 2023 · 328 Views



45. The statements described above, from Paragraphs 30 through 44 are collectively referred to as the “Defamatory Statements.”

46. Just like his prior accusations about General Flynn being involved in a “domestic terror” plot, Defendant’s new accusations about General Flynn being involved in Aracari Project—threatening and extorting Defendant and stealing financial information—are entirely fabricated. General Flynn has no idea who or what the Aracari Project is, nor is he familiar with any of the people involved in it. Defendant has zero basis to assert otherwise. To claim that this is a “Flynn backed organization” or that General Flynn has anything to do with the criminal activities allegedly being committed by the Aracari Project or its people is knowingly or recklessly false. Given Defendant’s *modus operandi*, it is almost a certainty that Defendant’s underlying allegations about Aracari Project and its people are similarly fabricated, or, at best, wildly exaggerated.

47. Defendant does not attempt to conceal his malice toward General Flynn, openly stating his hatred and his desire to see General Flynn and even his family members prosecuted for imagined and invented crimes.

48. Defendant claims to have “lost everything” and that his business “went under” because of General Flynn. Defendant has described General Flynn as “pure evil,” and stated that he can “burn in hell.” Defendant has said that he is disgusted and “livid” at General Flynn.

49. Defendant has repeatedly described being at “war” with General Flynn. He has said that he is “going after” General Flynn’s businesses and his brother, Joe

Flynn, and that he is “desperate to take down Flynn.” Indeed, Defendant repeatedly sends his false accusations to the FBI and DOJ, in a malicious attempt to have General Flynn investigated and prosecuted.

50. Defendant’s Defamatory Statements about General Flynn are knowingly and recklessly false. He is following an old pattern, making outrageous and baseless allegations in his attempt to degrade General Flynn, a man who has honorably served this country for 33 years.

51. Defendant does this to prop himself up and pose once again as a hero. In reality, Defendant is a liar, driven by spite, jealousy, and base greed, whose malicious lies cannot go unanswered.

**COUNT I**  
Defamation and Defamation *per se*

52. General Flynn realleges and incorporates the paragraphs above.

53. From January 6, 2023, and continuing to the present, Defendant has engaged in a nonstop smear campaign against General Flynn, repeatedly asserting what he knows to be false, including the following allegations:

- a. that General Flynn committed treason and sedition against the United States—a crime punishable by death;
- b. that General Flynn has committed or attempted to commit the crime of extortion and blackmail against elected officials;
- c. that Defendant witnessed crimes for which General Flynn will go to prison, including domestic terrorism and interference with elections;

- d. that General Flynn was setting up paramilitary operations in the United States;
- e. that General Flynn created the QAnon movement;
- f. that General Flynn spent time in jail or federal prison;
- g. that General Flynn committed the crime of lying to the FBI;
- h. that General Flynn, or operatives of General Flynn, threatened Defendant's family;
- i. that General Flynn or agents of General Flynn have committed crimes involving the theft of financial information.

54. All of these allegations and Defendant's Defamatory Statements are categorically false, and Defendant knew them to be false, or he made them with reckless disregard for the truth.

55. Defendant published his Defamatory Statements to tens of thousands of people on the internet, including via X, YouTube, Substack, and Apple podcast. Defendant's postings, as intended by Defendant, have been reposted and reshared online to thousands more.

56. Defendant's Defamatory Statements are reasonably understood to be statements of fact, rather than hyperbole or opinion, as demonstrated not only by the language used by Defendant, but by the reactions and comments of hundreds of individuals who responded to and reposted Defendant's statements.

57. The Defamatory Statements have directly and proximately caused General Flynn to suffer significant damages, including direct damages, damages to

his reputation, humiliation, embarrassment, mental anguish, anxiety, and fear for his safety and the safety of his family members, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendant.

58. Defendant, therefore, is liable for compensatory damages.

59. Defendant is also liable for punitive damages because of the wanton and outrageous nature of the defamation. Because Defendant had a specific intent to harm General Flynn and because Defendant's Defamatory Statements did harm General Flynn, there is no statutory cap on such damages.

60. The Defamatory Statements are also defamatory *per se*. Defendant outright accuses and implies that General Flynn committed one of the most serious crimes imaginable for a three-star general: treason against his country. Defendant accuses General Flynn of committing or attempting other infamous crimes, including blackmail, extortion, domestic terrorism, interference with elections, theft of financial information, and lying to the FBI. The Defamatory Statements subject General Flynn to hatred, ridicule, contempt, or disgrace. Such accusations impute to General Flynn conduct that would make him unfit to properly exercise his lawful businesses of promoting election integrity and transparency, of promoting pro-America policies, organizations, and political candidates, and of raising money for non-profit organizations. The Defamatory Statements are inherently injurious.

61. Defendant acted with actual malice and reckless disregard for the truth, as demonstrated by Defendant's extreme antipathy, ill-will, and desire to inflict harm

on General Flynn, his blatant fabrications, his actual knowledge of the falsity of many of his statements, and his reckless disregard for truth regarding many others.

**COUNT II**  
Injurious Falsehood

62. General Flynn realleges and incorporates the paragraphs above.

63. General Flynn is currently engaged in the business of promoting election integrity and reform.

64. Defendant's Defamatory Statements, accusing General Flynn of being a traitor, of participating in domestic terrorism and sedition, and of committing or attempting to commit the crimes of extortion, blackmail, election interference, and financial crimes, directly concern General Flynn's business.

65. Defendant intended for his Defamatory Statements to destroy General Flynn's reputation, to ruin his ability to participate in politics, elections, and policy advocacy, and to harm him financially. Defendant reasonably recognized and intended that the publication of his Defamatory Statements about General Flynn would result in pecuniary loss.

66. Defendant has explicitly stated his intent to damage General Flynn's pecuniary interests and to target his businesses.

67. General Flynn has suffered direct pecuniary losses as a result of Defendant's Defamatory Statements, including costs associated with lost business opportunities and money spent to defend his own reputation, in an amount to be proven at trial.

**Prayer for Relief**

WHEREFORE, Plaintiff Michael T. Flynn demands judgment against Defendant Everett Stern as follows:

- a. An award of compensatory, special, and punitive damages, as well as disgorgement of any and all income Defendant has made off of his lies about General Flynn, in an amount to be proven at trial, but no less than ten million dollars (\$10,000,000.00);
- b. Injunctive relief prohibiting the publication or republication of the Defamatory Statements;
- c. An award of Plaintiff's costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiff's rights and interests.

**Demand for Jury Trial**

Plaintiff demands a trial by jury on all issues so triable.

Dated: December 5, 2023

MICHAEL T. FLYNN  
*By Counsel*

Respectfully submitted,

/s/ Jared Roberts

Jared J. Roberts  
(Fl. Bar No. 1036550)  
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*Counsel for Plaintiff*



Everett Stern @EverettStern1

@FBI General Flynn is using a firm called The Aracari Project to work against Americans and Democracy. They state on their twitter "We reject the notion that all problems require a lawful solution." This is a dangerous group conducting illegal activities against Americans.

### The Aracari Project

@AracariProject

The Aracari (ärə'kärē) Project is a British-American Private Intelligence Agency. Here, we reject the notion that all problems require a lawful solution.

Professional Services London, United Kingdom aracariproject.co.uk  
Joined November 2022

162 Following 7 Followers

Not followed by anyone you're following

10:44 PM · Oct 12, 2023 · 22K Views

27 333 587 26



Post your reply

Reply



Everett Stern @EverettStern1 · Oct 12

@LindsayMoran It states on the Aracari Project website that you are the director of HUMINT intelligence operations. Is this true? Are you having your resume Hijacked or are you really affiliated with a group working against our democracy and promoting illegal activities?

1 32 74 2.9K



Everett Stern @EverettStern1 · Oct 12

@OffshoreAlert Why are you promoting the Aracari Project when they clearly state "they reject the notion that all problems require a lawful solution." Why are you having a Flynn backed organization working against American Democracy at your conference?

1 34 71 3.1K



Everett Stern @EverettStern1 · Oct 12

I want to know why William B. Ruzich who is a Flynn Operative that posted a target photo of my wife on twitter is running a "Private Intel Agency" stating that they reject the lawful solutions of problems. I also want to know why a fmr. CIA Officer is on the Aracari Project site?

1 23 77 2.2K





**Everett Stern** @EverettStern1 · Oct 12

The @CIA Inspector General needs to take a look as to why a fmr. CIA officer @LindsayMoran is on a foreign website "Private Intel Agency" that states they do not believe in the lawful solutions to problems. Why is General Flynn using foreign spies to harm American Democracy?

3 33 89 2.3K



**Everett Stern** @EverettStern1 · Oct 12

@SPYSCAPE1 @spymuseum Did you receive calls from foreign spies & cyber criminals to remove me from your lineup & take down the True Spies Podcast? I have evidence you did. You caved under the pressure of General Flynn. Are you siding with Trump & Flynn?

1 14 35 2K



**Everett Stern** @EverettStern1 · Oct 12

Anyone and I mean anyone associated with The Aracari Project is going to end up in jail. The group is running man in the middle operations against Americans stealing credit card information.

1 21 54 2.8K



**Everett Stern** @EverettStern1 · Oct 12

@Genflynn Did you or did you not hire The Aracari Project using William B. Ruzich to target my family and work against Democracy? Are you using foreign intelligence officers to accomplish your domestic terrorism mission?

2 22 44 2.3K



**Everett Stern** @EverettStern1 · Oct 13

@FBI @DOJCrImDiv This is what Aracari Project says on LinkedIn. I would check out their employees...

### About

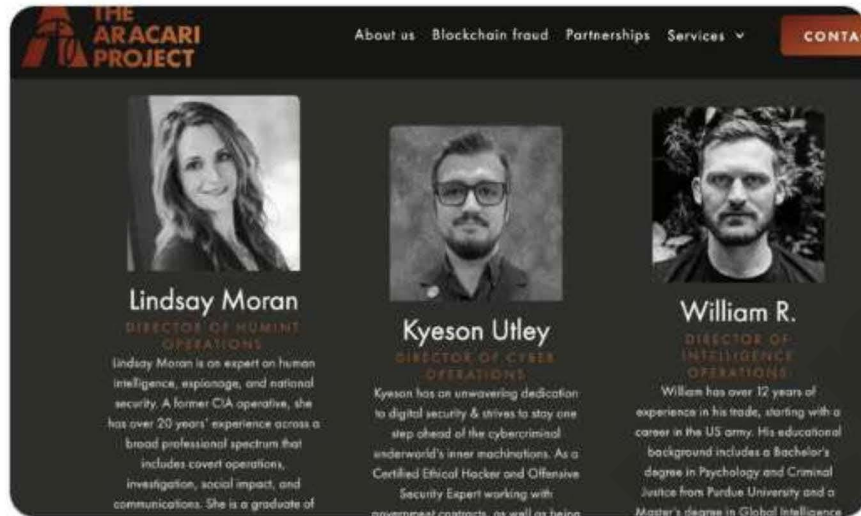
The Aracari (ära'särë) Project is a British-American Private Intelligence Agency, or PIA, with offices in both The United Kingdom & The United States. Here, we reject the notion that all problems require a lawful solution. Your adversaries don't play by the rules, & neither do we. We are strictly results driven.

We at The Aracari Project launch complex intelligence operations that are custom tailored to your unique situation. Our methods employ CIA & MI6 tradecraft to provide the most precise accuracy when carrying out our operations. We offer free consultations so that you can tell us about your situation and ask us any questions you may have so that we may address your concerns to the fullest.

3 24 46 3.1K



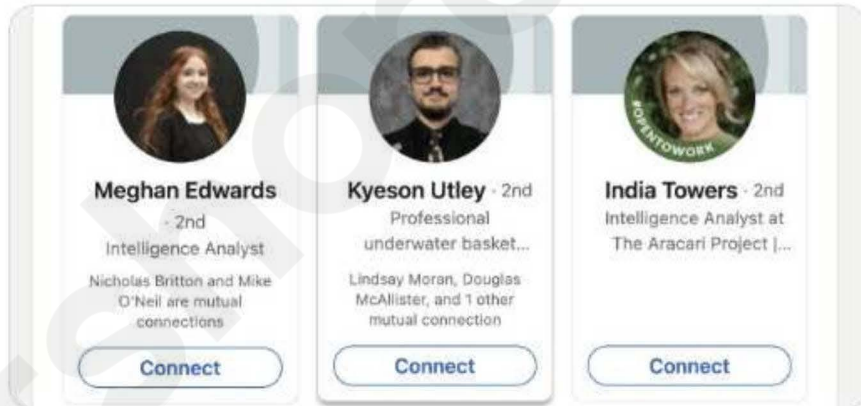
Everett Stern [@EverettStern1](#) · Oct 13  
[@FBI](#)



1 22 27 2.1K



Everett Stern [@EverettStern1](#) · Oct 13  
[@FBI](#) These are some of the employees of The Aracari Project that is using foreign spies to work against America and Democracy. Aracari Project clearly states on LinkedIn and Twitter that they believe it is okay to commit illegal acts to accomplish their mission.



3 31 39 2.1K



Everett Stern [@EverettStern1](#) · Oct 13  
[@spyscape](#) Why is Spyscape Entertainment listening to Flynn & Trump's people to remove me. I have evidence The Aracari Project called them & filed numerous false complaints against me. It is also interesting that Spyscape is promoting fmr. KGB & Russian Spies now.

1 4 16 963



**Everett Stern** @EverettStern1 · Oct 13

...

My legal team is exploring options with a Federal Lawsuit against The Aracari Project because they admit to criminal activity & they have gone after my wife and 12 year old son. I will not stand for any "Intelligence Org" especially a Flynn backed one from harming Americans.

2 12 56 2.5K



**Everett Stern** @EverettStern1 · Oct 13

...

@LindsayMoran you are a former CIA officer listed on a cyber criminals website. This group is working against Americans with possible ties to Russia. If they are just using your resume then you need to make a public statement denouncing the group. Otherwise, you are with them.

1 10 33 2.4K



**Everett Stern** @EverettStern1 · Oct 13

...

@LindsayMoran did you take part as head of HUMINT intelligence according to The Aracari project website in threatening my wife & 12-year-old son? Are you with this group or not? If you are with this group then I look forward to seeing you in Federal Court.

1 13 23 2.1K



**Everett Stern** @EverettStern1 · Oct 14

...

@OffshoreAlert Is promoting the Aracari project at their annual conference therefore promoting criminal activity. The CEO of Offshore Alert was notified that the Aracari project is Flynn-backed & clearly states that they do not believe in following the law. CEO does not care...

1 12 16 1.6K



**Everett Stern** @EverettStern1 · Oct 14

...

Boycott the @OffshoreAlert annual conference and the company. Investigate the Aracari Project and Offshore Alert. Do not support a company that promotes Flynn and criminal activity. Support companies that believe in protecting Democracy.

1 10 30 1.7K



**Everett Stern** @EverettStern1 · Oct 14

...

I sincerely urge and ask the OSINT community to research The Aracari Project and Offshore Alert. There is something very wrong going on.

1 13 24 1.3K



**Everett Stern** @EverettStern1 · Oct 14

The CEO of Offshore Alert is David Marchant @DEM\_Offshore He is with the people threatening my wife & 12 year old son? Look him up and see what he is involved in. He is promoting Flynn & William B. Ruzich at his @OffshoreAlert conference.

3 10 18 1.2K



**Everett Stern** @EverettStern1 · Oct 14

@FBI @DOJCrDiv David Marchant and his company Offshore Alert. Please take a closer look...

2 9 16 1.8K



**Everett Stern** @EverettStern1 · Oct 14

@FBI @DOJCrDiv David Marchant - the Owner of Offshore Alert and connected to The Aracari Project.



hackmd.io

The Dark Side Of David Marchant: The Story Behin...

# The Dark Side Of David Marchant: The Story Behind His Blog # Johnny Burris David Marchant is...

1 2 14 2K



**Everett Stern** @EverettStern1 · Oct 14

I will not allow my family to be attacked by Flynn via The Aracari Project and then promoted by David Marchant the owner of a company called Offshore Alert.

2 6 34 1.9K



**Everett Stern** @EverettStern1 · Oct 14

David Marchant is apparently an extortionist like Flynn.



1 8 24 2.2K



**Everett Stern** @EverettStern1 · Oct 14

I am wondering how much money David Marchant the CEO of offshore alert is being paid by Flynn?

1 1 16 1.5K



**Everett Stern** @EverettStern1 · Oct 18

Criminal Collaboration: General Flynn, Offshore Alert & Aracari Project, by [@EverettStern1 open.substack.com/pub/everettste...](#)

2 4 10 1.5K



**Everett Stern** @EverettStern1 · Oct 18

[@FBI @DOJCrimDiv](#) Criminal Collaboration: General Flynn, Offshore Alert & Aracari Project [open.substack.com/pub/everettste...](#)



1 2 11 1.7K



**Everett Stern** ✓ @EverettStern1 · Oct 18

Offshore Alert CEO David Marchant has sparked controversy due to alleged dissemination of disinformation & false narratives. Marchant, who poses as a journalist targets individuals and organizations he disapproves of, resorting to intimidation, extortion, and abuse.



1 7 14 2.9K



**Everett Stern** ✓ @EverettStern1 · Oct 18

@LindsayMoran why are you targeting me and my family? Why are you part of a group that admits openly that they commit crimes against Americans? Why is @spymuseum @SPYSCAPE1 promoting @LindsayMoran when she is part of a criminal group?

1 4 10 1.9K



**Everett Stern** ✓ @EverettStern1 · Oct 19

Since posting this thread the Aracari project founders Lindsay Moran, Keyson Uteley, and William B. Ruzich have changed their social media & site. Take a look at Spooky Good LLC & Orange Jungle Studio LLC. How does the @FBI allow for a company to advertise criminal activity?

2 6 19 1.9K



**Everett Stern** @EverettStern1 · Oct 19

...

I am now going to post the disgusting, threatening, and extortionary text messages I have received from The Aracari Project including General Flynn @GenFlynn, Lindsay Moran @LindsayMoran, William B. Ruzich, and Keyson Uteley. I warn everyone that they are disturbing.



2 19 29 2.5K



**Everett Stern** @EverettStern1 · Oct 19

...

@FBI In these text messages, it is admitted to that a conversation took place with General Flynn. The Aracari Project is Flynn-backed and has been targeting me and my family since the Flynn v. Stern Federal Lawsuit.

1 8 15 998



[Redacted] · Oct 13

...

Old enough to remember when actions like these would end up in a Loong jail sentence. Now we are truly on our own. Feels like a ticking time bomb.

2 1 165



**Everett Stern** @EverettStern1 · Oct 13

...

I am warning Americans & already filed formal complaints with the USG. This is a dangerous situation for a group to be helping Flynn spread disinformation and work against Americans. I know for a fact they are running man-in-the-middle operations to steal financial info.

2 6 190

# Criminal Collaboration: General Flynn, Offshore Alert & Aracari Project



EVERETT A. STERN

OCT 18, 2023



3



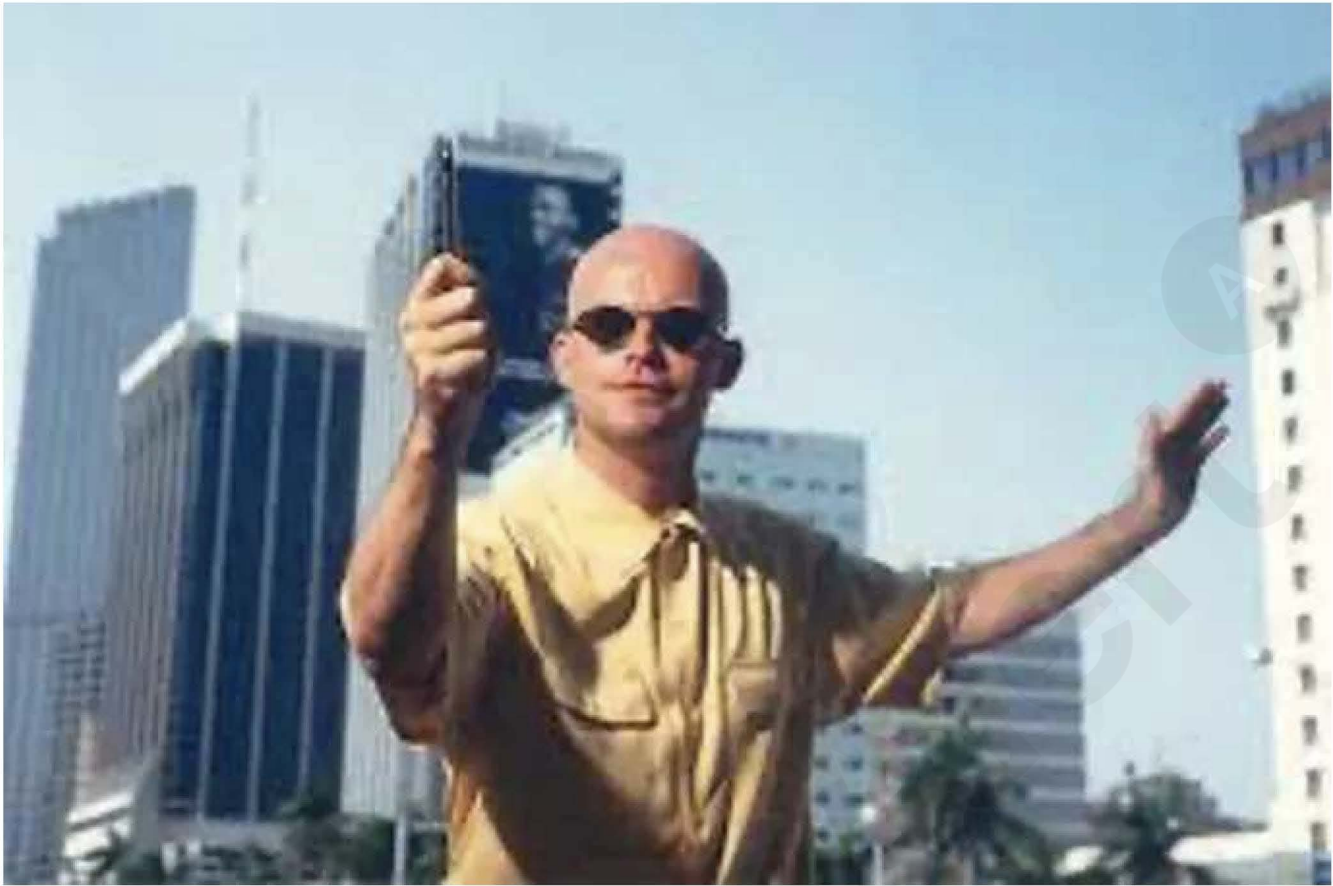
Share

Offshore Alert has gained notoriety for fabricating stories, extorting, and targeting individuals and organizations it holds animosity towards. Under the leadership of CEO David Marchant, Offshore Alert shamelessly exploits people's fears and spreads misinformation for personal gain. Marchant even fled England for Miami to avoid prosecution by those he victimized. As if that weren't enough, they have now joined forces with Aracari Project, a self-proclaimed "private intelligence company" openly admitting to engaging in illegal activities for financial gain. This collaboration, featuring a team including former Central Intelligence Agency (CIA) operative Lindsay Moran, cyber actor Kyeson Utley, and Intelligence Director William Ruzich, poses a significant threat to national security and the general public. Their dangerous tactics, which include harassment, intimidation, and unlawful actions, have prompted reports to the FBI and Inspector General, raising concerns about the impact on American national security.

## Stay alert! Offshores is Off-base

David Marchant serves as the CEO of Offshore Alert, a website and Twitter account that has sparked controversy due to alleged dissemination of disinformation and false narratives. Marchant, who poses as a journalist, exploits Offshore Alert as a platform to target individuals and organizations he disapproves of, resorting to intimidation, extortion, and abuse. His tactics have earned him a dubious reputation by leveraging people's fears and promoting his individual hubris, causing many to question the authenticity of his information.





Marchant actively endorsed members of the Aracari Project, a self-proclaimed "private intelligence company" that openly rejects lawful solutions to problems. This collaboration underscores their lack of moral compass, as the Aracari Project openly admits to engaging in illegal activities and profiting from them. With an absence of restraint and a penchant for questionable practices, the Aracari Project not only jeopardizes national security but also poses a potential danger to the public.

It is worth noting that Marchant relocated from England to Miami, seemingly in an effort to evade prosecution by those he allegedly victimized. This aspect further fuels skepticism surrounding his activities and underscores the questionable nature of his business endeavors. Ultimately, the association between Offshore Alert, the Aracari Project, and Marchant himself raises concerns about their potential detrimental impact on both national security and the general public.

### **Aracari Project and their Rejection of Lawful Solutions**

The Aracari Project is an organization that openly embraces unlawful methods to achieve its objectives. This may explain why General Flynn has chosen to collaborate with them. He seeks individuals who prioritize personal gain over the Constitution and our legal system all too willing to take a profit at the cost of our democracy. The organization has a brief history marred by a disregard for the rule of law and a willingness to engage in illegal activities for their own benefit.

The origins of the Aracari Project can be traced back to its founders' desire to operate outside the boundaries of conventional laws and regulations. They proudly advertise the rejection of lawful solutions, resorting instead to personal attacks, threats, and a willingness to operate in the realm of illegality.

The founding members of the group are Lindsay Moran, Kyeson Utley, and William R. Ruzich. Lindsay Moran has self-proclaimed experience in human intelligence, espionage, and national security, although she was unable to maintain her cover as a CIA operative. Kyeson Utley is in the trusted position of a licensed private investigator focused on cyber security, while being accused of engaging in man-in-the-middle attacks to steal personal and credit card information from American citizens. William R. Ruzich, the director of intelligence, has been involved in highly concerning operations, including making threats towards my family on social media. He has a history of betrayal releasing illegally hacked highly confidential material to spearhead a denigration campaign.

Not only has the Aracari Project been built upon a foundation of willingness to partake in illegal activities, but they have also monetized these operations, further highlighting their disregard for the rule of law. It is likely that they have expanded their activities to foreign territories. It is crucial to recognize the potential consequences of such behavior. The Aracari Project, by indulging in illegal activities and seeking monetary gains, not only poses a threat to national security but also endangers the general public. Their actions set a dangerous precedent and underscore the need for vigilant oversight and intervention from law enforcement agencies.

The time has come to take a firm stance against the Aracari Project and its blatant disregard for the rule of law. As an organization, they have operated with impunity due to their secrecy and willingness to employ unethical means. However, their actions have

not gone unnoticed; they have been identified and are now being reported to various government agencies.

### **William B. Ruzich is involved in unauthorized activities**

William Ruzich is involved in a campaign of harassment and illegal activities, specifically through the reprehensible practice of spoofing phone numbers. This unethical behavior has targeted numerous individuals, causing immense distress and posing a serious threat to their safety and privacy. His association as an agent for General Flynn and a keynote speaker for Offshore raises alarm bells, speaking volumes about the nature and intentions of Ruzich's activities.



It is evident that Ruzich operates without any moral or ethical boundaries, as his actions have been involved in numerous incidents of harassment, leaving victims with unsettling experiences. By maliciously spoofing phone numbers, he creates an illusion that the calls originate from trusted sources, instilling fear and confusion in the targeted individuals.

Moreover, Ruzich's use of spoofed phone numbers empowers him to carry out vindictive actions, such as publicly sharing personal information and photos of individuals' loved

ones on social media platforms. This invasive and disturbing behavior leaves victims vulnerable and exposed to potential harm.

These incidents of harassment and the use of spoofed phone numbers by Ruzich have had a detrimental impact on the targeted individuals and their families. They not only endure extreme emotional distress but also face the risk of physical harm due to the public exposure of their personal details. This abhorrent behavior demonstrates a complete disregard for the well-being of others and reveals the dangerous extent to which Ruzich is willing to go in his quest to intimidate and threaten.

### **The Criminal Nature of the Collaboration between Marchant, Ruzich, and Flynn**

The collaboration involving David Marchant, William R. Ruzich, and General Flynn not only promotes unethical behavior but also constitutes criminal activity. Their collective actions and intentions reveal a flagrant disregard for the law, posing a significant threat to national security.

Marchant, the CEO of Offshore Alert, has a history of targeting individuals and organizations he dislikes, exploiting his platform to intimidate and mistreat others. He manipulates people's fears and curiosity for personal gain, operating a fraudulent website to propagate false narratives. It is evident that Marchant's actions aim to exploit innocent individuals.

Ruzich, the director of intelligence for the Aracari Project, has engaged in a malicious operation to intimidate the writer's family. This operation involves posting personal photos of family members on social media and veiled threats of violence. The direction for these actions comes from their client, General Flynn. Ruzich has a history of misrepresentation, extortion attempts, and veiled threats. He illegally obtained confidential information through cyber hacking. In the past, Ruzich has also unfairly targeted CIA officers, further emphasizing his criminal behavior.

General Flynn's involvement in this collaboration only exacerbates the gravity of the situation. By aligning himself with a known disseminator of disinformation and engaging in illegal activities, Flynn undermines the integrity of national security and the principles of justice. All while making inexplicable petitions to supports to donate “pennies, nickels, dimes, quarters” to help him fight his subpoenas.

The criminal collaboration involving Marchant, Ruzich, and General Flynn has been officially reported to both the FBI and the inspector general. It is crucial that authorities conduct a thorough investigation and enforce accountability for their unlawful actions. Additionally, it is imperative to ensure that none of these individuals possess or maintain a security clearance. Given that the national security of America is at stake, it is of utmost importance to promptly address this issue in a comprehensive manner, upholding the highest standards of integrity and justice.

### **Conclusion:**

In conclusion, the actions of David Marchant, William R. Ruzich, and General Flynn in their collaboration with the Aracari Project raise serious concerns about their integrity and commitment to the rule of law. Their involvement is highly troubling, as it brings into question their ethical conduct and fidelity to the principles that govern our society.

David Marchant, the CEO of Offshore Alert, has a long history of targeting individuals and organizations he dislikes, using his website to spread false information. His tactics of intimidation and abuse are not only unethical but also detrimental to those who become victims of his slanderous campaigns. Marchant's actions are driven by personal vendettas rather than a genuine pursuit of truth.

William R. Ruzich, as the director of intelligence for the Aracari Project, plays a pivotal role in orchestrating illegal activities and engaging in cyber threats. His alleged involvement in man-in-the-middle attacks on American citizens is both morally reprehensible and criminal. Furthermore, Ruzich's previous targeting of CIA officers raises serious concerns about his suitability for any role involving national security.

The involvement of General Flynn further exemplifies the dangerous nature of this collaboration. As a former national security advisor, Flynn should be upholding the principles of national security, not engaging in illegal activities and exploiting innocent individuals. This partnership between a disinformation agent, a cybercriminal, and a disgraced former general poses a clear threat to the national security of the United States.

It is imperative that authorities take immediate action to address the illegal and unethical behaviors displayed by Marchant, Ruzich, and Flynn. These actions

undermine the fabric of our society and jeopardize the safety and well-being of our citizens. Only through a swift and thorough investigation can we ensure that justice is served and our national security is protected.

It is time for the government to swiftly and decisively take action against David Marchant, William Ruzich, and General Flynn for their participation in this criminal collaboration. Not only have they acted against the law by threatening innocent individuals with cyber attacks and disseminating false information, but they have also undermined the values of our country. By engaging in such activities, these three individuals have demonstrated a complete disregard for the safety of our citizens and the principles of justice. We must hold them accountable and ensure that justice is served.



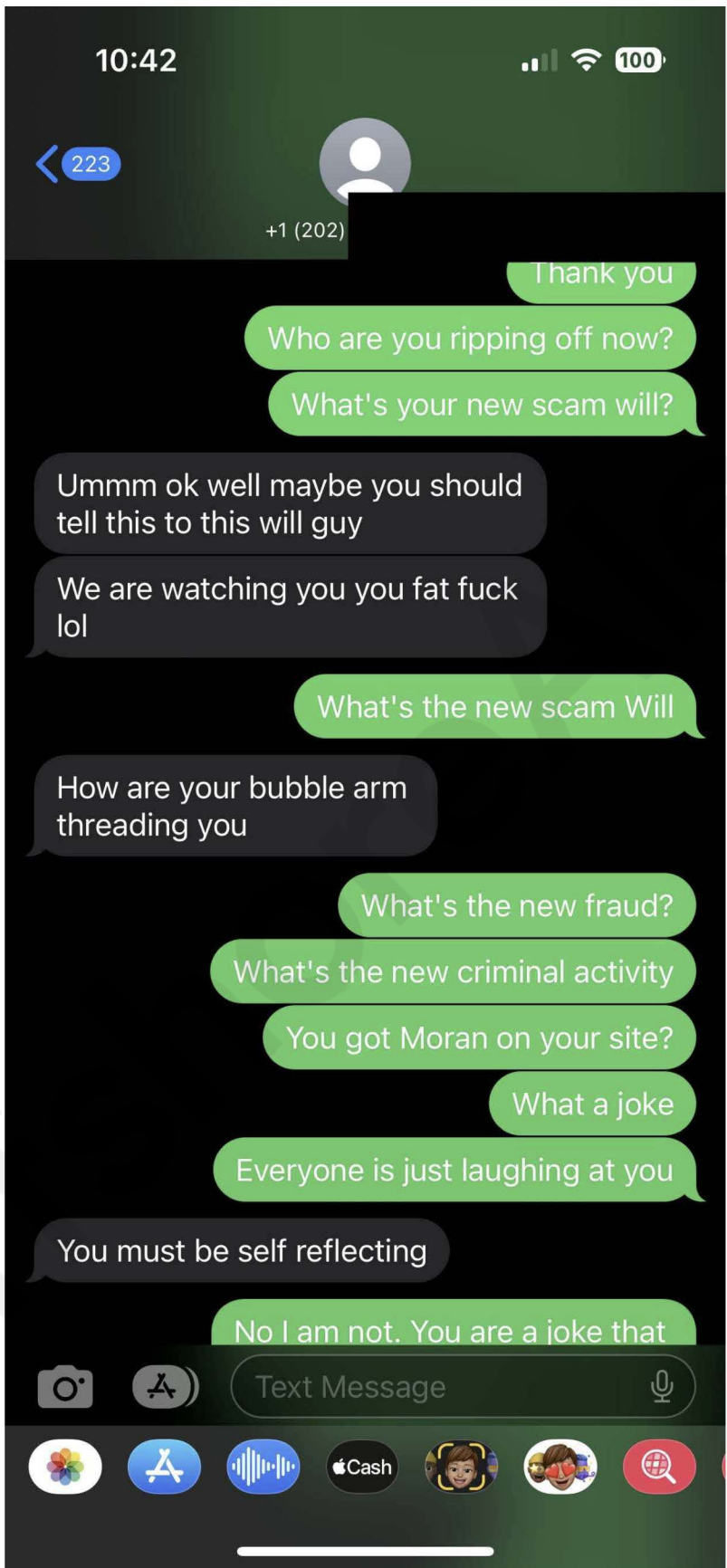
3 Likes

## Comments



Write a comment...

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[Substack](#) is the home for great writing



10:42

Signal strength, Wi-Fi, and 100% battery icons

< 223



+1 (202)

Thank you

Who are you ripping off now?

What's your new scam will?

Ummm ok well maybe you should tell this to this will guy

We are watching you you fat fuck lol

What's the new scam Will

How are your bubble arm threading you

What's the new fraud?

What's the new criminal activity

You got Moran on your site?

What a joke

Everyone is just laughing at you

You must be self reflecting

No I am not. You are a joke that

Text Message input area with camera, keyboard, and microphone icons





10:42

📶 100

< 223

+1 (202) [REDACTED]

money from your mistress dog.

Is a dog still supporting you?

What dog. Is this a dog you fuck every night

I know you like to have sex with weird animals especially those bunnies

You know what I am talking about

That dog if yours people send money

It is pathetic

Is that was you call those rabbits ?

You are just a fly

Or Jenny

Or wait her son

Omg you fuck her son like a dog

You sick fat fuck



Text Message



10:43

100

< 223

+1 (202)

You can't do a thing to me and you have zero influence

Are you sure you are not mentally ill

You are just a limp duck

Dick

Haha . Flynn was right about you

How's that Will?

Let's just clear this up right now !  
My name is not will . It's Chris ,  
but Flynn told me that for years  
you were harassing him on  
LinkedIn so this seems to be your  
MO

Lol

Ok Will

Sooooooooo mr stern you need to  
stop being a bitch and just admit  
when it over



Text Message



10:43

📶 100

< 223



+1 (202)

Soooooooo mr stern you need to stop being a bitch and just admit when it over

What do you want now?

What is it you want

What's the mission here Will

You will have to ask will

What's mission objective

But we want you to come to DC and go on capital hill and admit your full of shit

Lol

If you don't we will continue to release stuff about you

Ok

Laugh

Full of shit about what



Text Message

