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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

MATTHEW TAIBBI,

Plaintiff,

Civil Action No.:

v.

**COMPLAINT FOR LIBEL  
With Demand for Jury Trial**

SYDNEY KAMLAGER-DOVE,  
Defendant.

\_\_\_\_\_ X

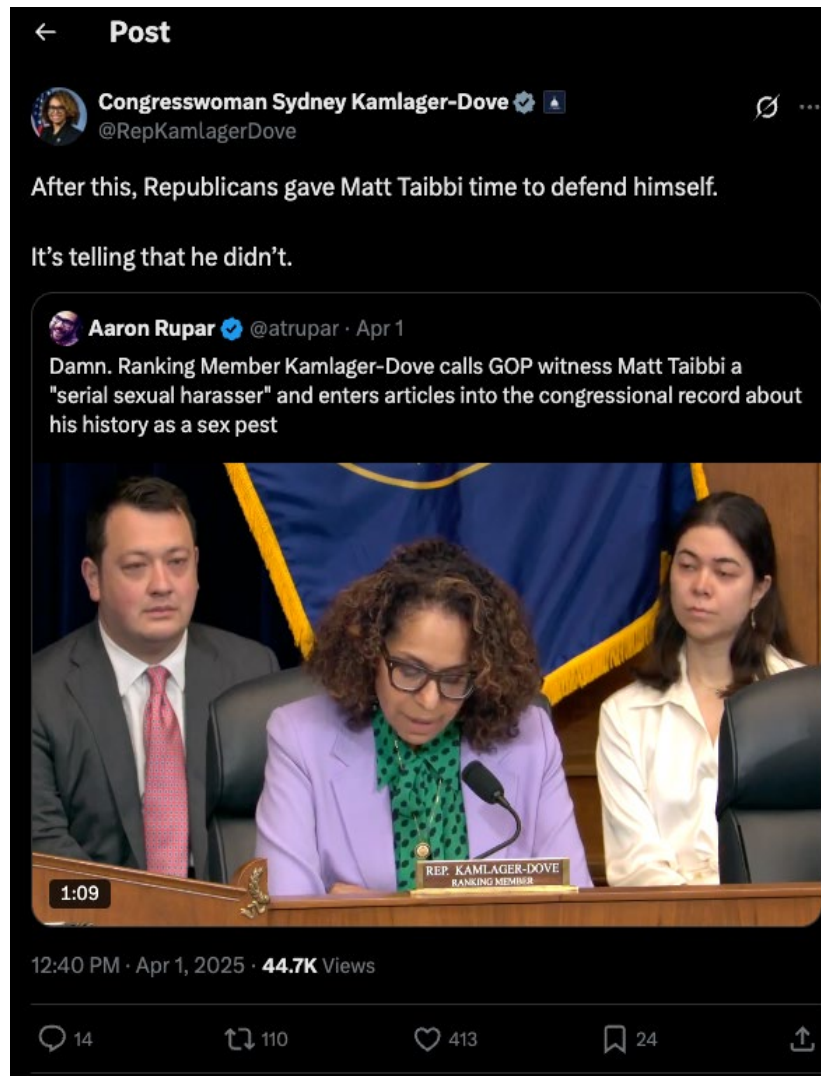
Plaintiff, Matthew Taibbi (“Plaintiff” or “Taibbi”), by and through his attorney of record, allege upon knowledge as to himself and his own actions and allege upon information and belief as to all other matters as follows:

**INTRODUCTION**

1. Plaintiff brings this action against Defendant Sydney Kamlager-Dove (“Defendant” or “Kamlager-Dove”) for libel arising from false statement made during a congressional hearing in Washington, D.C., which became defamatory statements as they were republished by Defendant on April 1,

2025, and republished by Defendant on the social media sites X and BlueSky, and on her official congressional website on the same date.

2. Defendant, a United States Representative for California’s 37th Congressional District, falsely accused Plaintiff, an award-winning journalist, bestselling author, and public figure domiciled in New Jersey, of being a “serial sexual harasser” during a televised hearing, at which Plaintiff had been invited to testify.
3. Defendant then reposted a video of her statements on X at 12:04 PM on April 1, 2025 (<https://x.com/i/status/1907074669712191910>) as shown below:



4. Defendant also posted the video on the social media site BlueSky at 12:42 PM (<https://bsky.app/profile/repkamlagerdove.bsky.social/post/3llrcwyxzmk2t>) as shown below:



**Congresswoman Sydney Kamlager-Dove**  
@repkamlagerdove.bsky.social + Follow

After this, Republicans gave Matt Taibbi time to defend himself.

It's telling that he didn't.



**Aaron Rugar** @atrupar.com · 1d  
Damn. Ranking Member Kamlager-Dove calls GOP witness Matt Taibbi a "serial sexual harasser" and enters articles into the congressional record about his history as a sex pest

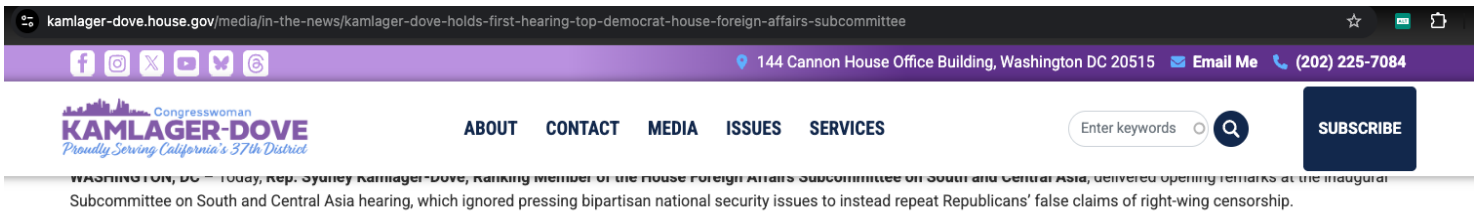


April 1, 2025 at 12:42 PM  Everybody can reply

---

15 reposts 83 likes

5. Defendant also posted a transcript of her statement on her official website <https://kamlager-dove.house.gov/media/in-the-news/kamlager-dove-holds-first-hearing-top-democrat-house-foreign-affairs-subcommitte> together with a link to the video, amplifying the defamation to Plaintiff’s home state and beyond, as shown below:



[Watch the full video here.](#)

Below are **Ranking Member Kamlager-Dove's** remarks, as prepared for delivery, at today's subcommittee hearing:

*Thank you, Mr. Chair, and thank you to our witnesses for being here for our first South and Central Asia Subcommittee hearing. I look forward to working with the Chair in a bipartisan way on the critical issues we are charged with overseeing.*

*Unfortunately, we're not having a hearing about any of those. Instead, this Subcommittee is wasting taxpayer time and resources on the fifth such hearing Republicans have held across multiple committees on the so-called "censorship-industrial complex."*

*The majority is relitigating a made-up conspiracy theory about a part of the State Department that no longer exists to distract from the dumpster fire foreign policy this Administration is pursuing—and elevating a serial sexual harasser as their star witness in the process.*

6. These statements are demonstrably false and were made with actual malice—either with knowledge of their falsity or with reckless disregard for their truth—as required under New Jersey and federal law for a public figure such as Plaintiff.

7. The allegations echo prior false claims that have been the subject of legal action and multiple public corrections, of which Defendant was undoubtedly aware, evidencing her actual malice.
8. The republications on X, BlueSky and Defendant’s website, made outside the scope of her legislative duties, are not protected by the Speech and Debate Clause and are thus actionable.
9. Plaintiff seeks compensatory and punitive damages, as well as injunctive relief, to redress the severe harm to his reputation and livelihood.

**JURISDICTION AND VENUE**

10. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332(a) because there is complete diversity of citizenship between the parties—Plaintiff is domiciled in New Jersey, and Defendant is domiciled in California—and the amount in controversy exceeds \$75,000, exclusive of interest and costs.
11. Venue is proper in this District under 28 U.S.C. § 1391(b)(1) because Plaintiff resides in New Jersey, and a substantial part of the harm caused by Defendant’s defamatory statements—namely, damage to Plaintiff’s reputation and economic interests—occurred in this judicial district, where Plaintiff is domiciled and conducts his professional activities.
12. Venue is also proper under 28 U.S.C. § 1391(b)(2) as Defendant’s republication of the statements on X, BlueSky, and her official website caused them to be disseminated and accessed in this district.

**PARTIES**

13. Plaintiff Matthew Taibbi is an individual domiciled in New Jersey. He is a prominent journalist, author, and commentator known for his investigative reporting, winner of the National Magazine

Award and author of four New York Times bestsellers, and contributions to publications such as Rolling Stone and his newsletter, Racket News.

14. As a widely recognized figure in journalism and public discourse, Plaintiff is a public figure for purposes of defamation law.
15. Defendant Sydney Kamlager-Dove is an individual domiciled in California and a member of the United States House of Representatives, representing California's 37th Congressional District.
16. At all times relevant to this complaint, Defendant conducted official duties in Washington, D.C., and published statements accessible in New Jersey.

#### **FACTUAL ALLEGATIONS**

17. On April 1, 2025, Defendant, as Ranking Member of the South and Central Asia Subcommittee of the House Foreign Affairs Committee, participated in a hearing titled "Censorship Allegations Involving the State Department's Former Global Engagement Center" in Washington, D.C.
18. Plaintiff was one of three witnesses invited to testify regarding his reporting on government censorship and related First Amendment issues.
19. At the outset of the hearing, Defendant addressed Republican Chairman Bill Huizenga and stated: "I look forward to working with the chair on the critical issues we are charged with overseeing. Unfortunately, we are not having a hearing about any of those issues. Instead... To distract from the dumpster fire this administration is pursuing, [the majority is] elevating a serial sexual harasser as their star witness." This statement referred directly to Plaintiff.
20. Defendant then requested unanimous consent to enter two articles into the congressional record: a Chicago Reader article titled "Twenty years ago, in Moscow, Matt Taibbi was a misogynist asshole—and possibly worse" (available at <https://chicagoreader.com/blogs/twenty->

years-ago-in-moscow-matt-taibbi-was-a-misogynistasshole-and-possibly-worse/), and a Washington Post article titled “The two expat bros who terrorized women correspondents in Moscow” ([https://www.washingtonpost.com/outlook/the-two-expat-bros-who-terrorized-womencorrespondents-in-moscow/2017/12/15/91ff338c-ca3c-11e7-8321-481fd63f174d\\_story.html](https://www.washingtonpost.com/outlook/the-two-expat-bros-who-terrorized-womencorrespondents-in-moscow/2017/12/15/91ff338c-ca3c-11e7-8321-481fd63f174d_story.html))

21. The hearing was televised and widely disseminated, including via a YouTube video (<https://youtu.be/ODo2-5DytdA?si=QkvcPlxw8ysQdrG>).
22. Defendant then decided to not only repost the video of her statements by way of X at 12:04 PM on April 1, 2025 (<https://x.com/i/status/1907074669712191910>) but then chose to comment on Plaintiff’s decision not to focus on the subject matter of the hearing rather than making himself the story.
23. Forty minutes later, at 12:42 PM on April 1, 2025, she reposted the video on BlueSky (<https://bsky.app/profile/repkamlagerdove.bsky.social/post/3llrcwyxzmk2t>).
24. Defendant further republished her remarks on her official congressional website <https://kamlager-dove.house.gov/media/in-the-news/kamlager-dove-holds-first-hearing-top-democrat-house-foreign-affairs-subcommittee> on the same date, as making them accessible to Plaintiff’s community and professional network in New Jersey.
25. This reposting under the “Media” and “In The News” sections of her website, were by its own admission a newsletter or a press release. Defendant’s republications on X and her website, occurring outside the scope of her legislative duties, are not protected by the Speech and Debate Clause of the U.S. Constitution (Art. I, § 6, cl. 1), which shields only statements made in the course

of legislative activity, not subsequent public dissemination for political or personal purposes (see *Hutchinson v. Proxmire*, 443 U.S. 111 (1979)).

26. These republications are therefore actionable under New Jersey law.
27. Defendant's accusation that Plaintiff is a "serial sexual harasser" is false.
28. Plaintiff has never been accused by any woman of sexual harassment, nor has he been charged with, convicted of, or found liable for any such conduct.
29. The articles cited by Defendant do not substantiate her claim.
30. Upon information and belief, Defendant was seeking to boost her reputation at the expense of the Plaintiff's.
31. They reference a satirical passage from a book Plaintiff co-authored with Mark Ames, titled "The eXile: Sex, Drugs, and Libel in the New Russia," about their time editing a nightlife guide in Moscow in the late 1990s.
32. In one passage, Ames describes a fictional scene in which an American female co-worker complained about their treatment of Russian female staff, to which Plaintiff allegedly replied, "But... it is funny."
33. Both authors have repeatedly stated this was satirical and invented.
34. Journalist Walker Bragman of Paste Magazine interviewed the women named in the passage— Masha and Sveta.
35. One Masha, a Russian-born American citizen who had a long-term relationship with Plaintiff, stated: "I was never harassed by Matt Taibbi, nor did I see him sexually harass anyone at work or outside work either. It was a ridiculous passage written by Mark."



36. She added that she left “The eXile” because they began dating, and Plaintiff avoided workplace impropriety.

37. The woman identified as “Sveta” confirmed the scene “never happened” and that Plaintiff never behaved inappropriately.

38. The book’s publisher, Grove Atlantic, clarified to The Guardian that its “non-fiction” label was inaccurate, as it combines “exaggerated, invented satire and nonfiction reporting.”

39. These allegations have been the subject of prior legal action and multiple corrections in the public record, of which Defendant was undoubtedly aware.

40. In 2017-2018, following similar false claims, Plaintiff secured settlements with several publications:

i) “The Guardian” amended an article by Jessica Crispin on April 10, 2018, removing references to Plaintiff and noting that the women referred to in “The eXile” “have since said they have never been harassed by Taibbi.”

ii) “The Nation” issued a correction on February 13, 2018, removing an inaccurate statement about Plaintiff and apologizing for the error after a settlement, as reported by the Daily Caller (<https://dailycaller.com/2018/02/15/the-nation-matt-taibbi-settlement/>).

iii) “Newsweek” updated an article on March 23, 2018, removing Plaintiff’s name and clarifying that “The eXile” contained satire, per Grove Atlantic’s 2017 statement.

41. Defendant acted with actual malice in making and republishing these statements.

42. Defendant either knew the statements were false or acted with reckless disregard for their truth, as evidenced by her reliance on unverified, decades-old satirical content that had been widely

discredited by prior legal action and public corrections—corrections of which she, as a public official with access to such information, was undoubtedly aware.

43. Defendant’s decision to republish the statements on X and her website, outside her legislative duties, further demonstrates an intent to harm Plaintiff’s reputation in his home state and beyond, rather than a good-faith engagement in legislative debate.

44. Plaintiff, a husband and father of three with no criminal history, has suffered severe reputational harm, emotional distress, and economic loss in New Jersey, where he resides and works.

45. This harm compounds prior damage in 2017 when he was fired by Random House despite his best-selling record, now exacerbated by Defendant’s actions.

#### **COUNT I: LIBEL**

46. Plaintiff incorporates by reference paragraphs 1 through 45 as if fully set forth herein.

47. Defendant published false and defamatory statements about Plaintiff by republishing and commenting on her statements made in a televised congressional hearing, that he is a “serial sexual harasser,” on X on April 1, 2025, at 12:04 PM (<https://x.com/i/status/1907074669712191910>) making it accessible in New Jersey.

48. Defendant published false and defamatory statements about Plaintiff by republishing and commenting on her statements made in a televised congressional hearing, that he is a “serial sexual harasser,” on BlueSky on April 1, 2025, at 12:42 PM (<https://bsky.app/profile/repkamlagerdove.bsky.social/post/3llrcwyxzmk2t>) making it accessible in New Jersey.

49. Defendant published false and defamatory statements about Plaintiff by republishing her statements made in a televised congressional hearing on her official website (<https://kamlager->

[dove.house.gov/media/in-the-news/kamlager-dove-holds-first-hearing-top-democrat-house-foreign-affairs-subcommittee](https://dove.house.gov/media/in-the-news/kamlager-dove-holds-first-hearing-top-democrat-house-foreign-affairs-subcommittee) ) on the same date, making it accessible in New Jersey.

50. These statements were communicated to third parties, including Plaintiff's professional and personal community in New Jersey, via YouTube, X, BlueSky, and her official website, reaching a vast audience.
51. The statements are defamatory under New Jersey law because they falsely impute criminal conduct and moral turpitude to Plaintiff, damaging his reputation as a public figure.
52. Defendant acted with actual malice, as required for a public figure.
53. Defendant either knew the statements were false or acted with reckless disregard for their truth, ignoring prior legal action and public corrections debunking these allegations—corrections of which she was undoubtedly aware—and republishing the defamation on X, BlueSky and her website, outside the scope of her legislative duties, with intent to harm Plaintiff's reputation.
54. These republications are not protected by the Speech and Debate Clause.
55. As a proximate result of Defendant's libelous statements, Plaintiff has suffered substantial harm in New Jersey, including damage to his reputation, emotional distress, and economic loss, all of which require proof of actual damages as a public figure.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Matthew Taibbi respectfully requests that this Court:

- a. Enter judgment in favor of Plaintiff and against Defendant on Count I for libel;
- b. Award Plaintiff compensatory damages in an amount to be determined at trial, but not less than \$10,000,000, for reputational harm, emotional distress, and economic loss;

- c. Award Plaintiff punitive damages in an amount to be determined at trial, to punish Defendant's malicious conduct and deter similar acts;
- d. Issue an injunction requiring Defendant to retract her defamatory statements publicly, including on X, BlueSky and her official website, and refrain from further false statements about Plaintiff;
- e. Award Plaintiff his costs and reasonable attorneys' fees; and
- f. Grant such other relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

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

DATED: April 3, 2025  
New York, NY

Respectfully submitted,

**Garson Segal  
Steinmetz Fladgate LLP**

/s/ Michael Steinmetz  
Michael Steinmetz (MS-3164)

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305-780-5212  
[rg@gs2law.com](mailto:rg@gs2law.com)

*Counsel for Plaintiff Matthew Taibbi*

**CERTIFICATION PURSUANT TO LOCAL RULE 11.2**

I, Michael Steinmetz, the undersigned attorney of record for Plaintiff, do hereby certify to my own knowledge and based upon information available to me at my office, the matter in controversy is not the subject of any other action now pending in any court or in any arbitration or administrative proceeding.

Dated: April 3, 2025

By: /s/ Michael Steinmetz  
Michael Steinmetz (MS-3164)

# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

**Matthew Taibbi**

**(b)** County of Residence of First Listed Plaintiff Morris, NJ  
*(EXCEPT IN U.S. PLAINTIFF CASES)*

**(c)** Attorneys *(Firm Name, Address, and Telephone Number)*

**Garson, Segal Steinmetz Fladgate LLP, 164 W25th St, 11th Flr  
New York, NY 10001 212-380-3623**

**DEFENDANTS**

**Sydney Kamlager-Dove**

County of Residence of First Listed Defendant Los Angeles, CA  
*(IN U.S. PLAINTIFF CASES ONLY)*

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

**II. BASIS OF JURISDICTION** *(Place an "X" in One Box Only)*

1 U.S. Government Plaintiff

2 U.S. Government Defendant

3 Federal Question *(U.S. Government Not a Party)*

4 Diversity *(Indicate Citizenship of Parties in Item III)*

**III. CITIZENSHIP OF PRINCIPAL PARTIES** *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** *(Place an "X" in One Box Only)* [Click here for: Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN** *(Place an "X" in One Box Only)*

1 Original Proceeding     2 Removed from State Court     3 Remanded from Appellate Court     4 Reinstated or Reopened     5 Transferred from Another District *(specify)*     6 Multidistrict Litigation - Transfer     8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*

Brief description of cause:  
Defamation

**VII. REQUESTED IN COMPLAINT:**     CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    DEMAND \$ 10,000,000    CHECK YES only if demanded in complaint: JURY DEMAND:  Yes     No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):*    JUDGE \_\_\_\_\_    DOCKET NUMBER \_\_\_\_\_

DATE 4/3/2023    SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_