

IN THE COURT OF COMMON PLEAS
OF LACKAWANNA COUNTY

MAURI B. KELLY
LACKAWANNA COUNTY
2024 MAR 19 P 3:04
CLERK OF JUDICIAL
RECORDS CIVIL DIVISION

PHILIP GODLEWSKI,

Plaintiff

vs.

CHRIS KELLY, et al.

Defendants

No.: 2021-CV-2195

DEFENDANTS' REPLY BRIEF TO PLAINTIFF'S BRIEF IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

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**DEFENDANTS' REPLY BRIEF TO PLAINTIFF'S BRIEF IN OPPOSITION OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants, Chris Kelly (hereinafter ("Kelly") and The Scranton Times, L.P. (collectively referred to herein as "Defendants"), by and through their counsel, hereby file this Reply Brief and state as follows:

I. ARGUMENT

(a) As a matter of law, Plaintiff has failed to prove Defendants published any defamatory statements about Plaintiff with actual malice.

Plaintiff claims the article defamed him by "a. asserting that Godlewski admitted to having a sexual relationship with a minor and that Godlewski pled guilty to an offense involving that sexual relationship; b. impugning Godlewski's fitness as a realtor; and c. associating Godlewski with the January 6 insurrection at the Capitol." (Plaintiff's Brief, p. 8.)

As to b. above, Godlewski refers to the article's headline "QAnon Realtor has a deal for gullible" and the first sentence of the article which states "[O]ne of the QAnon movement's most devoted dead-enders in a Clarks Summit based Realtor . . ." (Plaintiff's Brief, p. 9.) Plaintiff admits he was a realtor and a QAnon movement influencer/broadcaster. (See **Exhibit "2"** from Defendants' Brief, pp. 209-210 and 35-38.) The truth is not defamation. *Graboff v. Colleran Firm*, 744 F.3d 128, 136 (3rd Cir. 2014). The article includes a statement in paragraph 35 that states Godlewski "traffic[s] in lies." (See **Exhibit "2"** from Defendants Brief, pp. 33-34.) The only statements in the article about Plaintiff being a realtor are that he is a Clarks Summit-based realtor who sells homes for a national real estate franchise. (See **Exhibit "1"** from Defendants' Brief, ¶¶ 1 and 2.) These statements are completely true. The article also identifies Plaintiff as being a popular broadcaster for the QAnon movement. The article includes Kelly's opinion that Godlewski spreads lies on the internet. This assertion has not been countered by Plaintiff in his

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brief.

The article (See **Exhibit "1"** from Defendants' Brief) states in paragraph 1 that Godlewski broadcasts "Donald Trump is still president and working behind the scenes to depose Joe Biden, impose martial law and bring final justice to elected Democrats and other satanic child sex traffickers." Plaintiff has presented no evidence these factual statements are false or made with actual malice. Plaintiff does not dispute the truth of the article's statements that he "sells QAnonsense to thousands of followers around the globe" or that he had more than 26,000 subscribers to his You-Tube channel. (See **Exhibit "1"** from Defendants' Brief, ¶ 2.) The article states there were many Q followers in the mob of domestic terrorists who ransacked the Capitol on January 6" based on Kelly's viewing of the second impeachment trial of Donald Trump. (See **Exhibit "1"** from Defendants' Brief, ¶ 4.) That trial included numerous hours of video coverage showing the riot at the U.S. Capitol. Plaintiff has presented no evidence to indicate these factual statements are false or made with actual malice. The article includes Kelly's opinions that Godlewski spreads "poison" on the internet as a broadcaster for the Q movement. This is just another way of stating he spreads lies. Plaintiff's 31-page brief opposing the motion for summary judgment provides no evidence disputing the article's assertions that Godlewski is prominent QAnon broadcaster who spread lies and false conspiracy theories.

The article, paragraph 12 (See **Exhibit "1"** from Defendants' Brief), states as fact: "There is no room for doubt in the QAnon cult, Adherents believe that "Q" is a mysterious Individual (or group of them) with a high-level security clearance. Q is privy to a "plan" by Trump to round up and execute the Satanic vampire pedophiles in a sweeping cataclysm called "The Storm" which will lead to a "Great Awakening." Godlewski admitted these facts are true in his deposition. He testified that "the cabal is a global group of elites such as high-ranking

government officials, high-ranking CEOs and presidents of Companies, central bankers worldwide and other billionaires that control the world without any of its citizens knowing it.” (See **Exhibit “2”** from Defendants’ Brief, p. 172.) Godlewski believes the government is controlled by a cabal which operates a global child sex-trafficking ring to harvest adrenochrome and for sex purposes. (See **Exhibit “2”** from Defendants’ Brief, pp. 180-181.) Godlewski has done broadcasts about the coming “Storm” when the world-wide military patriots will set humanity free from the Cabal’s rule. (See **Exhibit “2”** from Defendants’ Brief, p. 183.)

Godlewski’s role in the QAnon movement is to provide grassroots dissemination of information of what is happening and to expose the lies of the mainstream media. (See **Exhibit “2”** from Defendants’ Brief, p. 183.) He describes himself as a highly ranked person in the Q movement. (See **Exhibit “2”** from Defendants’ Brief, pp. 35-36.) Godlewski became prominent in the Q movement right after the November 3, 2020 election. (See **Exhibit “2”** from Defendants’ Brief, pp. 222-223.) Godlewski broadcasted that Hillary Clinton and her Chief of Staff Huma Abedin molested children so adrenochrome could be extracted from them. (See **Exhibit “2”** from Defendants’ Brief, p. 174.) Hillary Clinton was then executed at Guantanamo Bay on December 31, 2018 after a military tribunal. (See **Exhibit “2”** from Defendants’ Brief, pp. 163-166.) Donald Trump was present for the execution. (See **Exhibit “2”** from Defendants’ Brief, p. 166.) Joe Biden was also executed in 2019 after a military tribunal for crimes against humanity. (See **Exhibit “2”** from Defendants’ Brief, p. 167.)

A public figure must prove actual malice—which is defined as knowledge that the publications were false or a reckless disregard of whether they were true or false—by clear and convincing evidence. See *New York Times Co. v. Sullivan*, 376 U.S. at 279-80; *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 14 (1990). Although the concept of “reckless disregard” cannot

be fully encompassed in one infallible definition, the U.S. Supreme Court has made it clear the defendant must have made the false publication with a “high degree of awareness of . . . probable falsity,” or must have “entertained serious doubts as to the truth of his publication.” *Garrison v. Louisiana*, 379 U.S. 64, 74 (1964); *St. Amant v. Thompson*, 390 U.S. 727, at 731 (1968), *Harte-Hanks Commc'ns v. Connaughton*, 491 U.S. 657, 667 (1989). The Supreme Court wrote in *Curtis Publishing Co. v. Butts*, 388 U.S. 130, 153 (1967), that evidence of either deliberate falsification or reckless publication “despite the publisher’s awareness of probable falsity” was essential to recovery by public officials in defamation actions.

“The burden of proof imposed is substantial, as the actual malice standard goes so far as to forbid imposition of liability even in those instances where the defendant negligently publishes false, defamatory statements about a public figure or public official.” *Blackwell v. Eskin*, 916 A.2d 1123, 1125 (Pa. Super. 2007) (quoting in part *Norton v. Glenn*, 860 A.2d 48, 56 (Pa. 2004)). “[E]ven an extreme departure from professional standards, without more, will not support a finding of actual malice.” *Tucker v. Fischbein*, 237 F.3d 275, 286 (3d Cir. 2001) (citing *Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 665, 109 S. Ct. 2678, 105 L. Ed. 2d 562 (1989). To establish that a defendant acted with reckless disregard for the truth, “[t]here must be sufficient evidence to permit the conclusion that the defendant in fact entertained serious doubts as to the truth of his publication.” *Norton*, 860 A.2d at 55. This standard requires evidence “so clear, direct, weighty, and convincing as to enable the trier of fact to come to a clear conviction, without hesitancy of the trust of the precise facts in issue.” *Bartlett v. Bradford Publ'g, Inc.*, 885 A.2d 562 at 566 (Pa. Super. 2005).

“The requirement that the plaintiff be able to show actual malice by clear and convincing evidence is initially a matter of law.” *Tucker*, 848 A.2d at 128 (citing *Milkovich v. Lorain*

Journal Co., 497 U.S. 1, 17 (1990). The important role the court serves in determining this threshold issue of actual malice as a matter of law is well-documented:

This rule is not simply premised on common-law tradition, but on the unique character of the interest protected by the actual malice standard. Our profound national commitment to the free exchange of ideas, as enshrined in the First Amendment, demands that the law of libel carve out an area of breathing space so that protected speech is not discouraged ... Most fundamentally, the rule is premised on the recognition that judges, as expositors of the Constitution, have a duty to independently decide whether the evidence in the record is sufficient to cross the constitutional threshold that bars the entry of any judgment that is not supported by clear and convincing proof of actual malice.

Tucker, 848 A.2d at 128 (emphasis in original) (quoting *Harte-Hanks Communications, Inc. v. Connaughton*, 491 U.S. 657, 685 (1989)).

Plaintiff testified he has no idea as to Kelly's state of mind when he wrote the article. (See **Exhibit "2"** from Defendants' Brief, pp. 297 and 300.) According to Plaintiff, if Kelly didn't know what he was writing was false, "he should have." (See **Exhibit "2"** from Defendants' Brief, p. 298.) Godlewski believes Kelly didn't "investigate good enough." (See **Exhibit "2"** from Defendants' Brief, pp. 298-299.) "I think he [Kelly] relied upon his own Scranton Times article "[the 2011 article by Denis O'Malley Exhibit "3"] and "he stopped right there, I think." (See **Exhibit "2"** from Defendants' Brief, p. 301.)

Kelly's investigation into whether Godlewski had a sexual relationship with a 15-year-old girl included his review of archived news articles at the Times-Tribune and court documents from the criminal case. (See **Exhibit "44"** from Defendant's Brief, p. 42-43.) (See **Exhibit "45"** and **Exhibit "3"** from Defendants' Brief.) Kelly specifically reviewed the 2011 article by Denis O'Malley under the headline: "Ex-baseball coach sentenced for sex with girl, 15." (**Exhibit "44"**, p. 45.) He thinks he also reviewed the criminal court case affidavit and Godlewski's guilty plea colloquy. (See **Exhibit "44"** from Defendants' Brief, pp. 45-46 and 53.) Kelly also talked to people in law enforcement who corroborated the statements made in the article. (See **Exhibit**

“44” from Defendants’ Brief, pp. 62-63.) There is no evidence Kelly *subjectively* entertained serious doubts about the truth or falsity of his statements in the article.

Plaintiff contends Defendants acted with “reckless disregard” by claiming Defendants deviated from acceptable journalistic standard to a degree demonstrating reckless conduct. (Plaintiff’s Brief, p. 25.) Plaintiff recorded the deposition of the Times-Tribune’s Executive Editor Larry Holeva during discovery. Mr. Holeva had no involvement in investigating facts for the article, writing the article or editing the article. (See **Exhibit “1”** from Plaintiff’s Brief, pp. 10, 25-37, 38-39.) Plaintiff’s counsel did not depose any of the editors who were actually involved in editing the article.

Plaintiff’s brief asserts every reporter should examine the Criminal Complaint, the Information charging document, the Guilty Plea Colloquy and all documents listed in a criminal case when writing an article relating to a criminal proceeding. (Plaintiff’s Brief, p. 26.) Plaintiff claims that Chris Kelly reviewed only the Criminal Complaint and Guilty Plea Colloquy and not the Information. (Plaintiff’s Brief, p. 26.) Kelly testified he does not recall whether he reviewed the Information or not before writing the article. (See **Exhibit “44”** from Defendants’ Brief, pp. 50-51.) Plaintiff then makes the argument that because the criminal complaint, guilty plea colloquy and Information do not include an explicit admission by Godlewski that he had sex with the minor and pled guilty to the corruption charge because of a sexual relationship with the minor, it never happened. (Plaintiff’s Brief, pp. 26-27.) At best, Plaintiff is attempting to make out a negligence claim against Defendants for a less than complete investigation. Holeva’s testimony which discusses general journalism concepts does not demonstrate an extreme departure from journalism standards. Plaintiff has not produced an expert report from any journalism expert.

Plaintiff's brief also states: "Kelly was well aware, from his text discussions with Godlewski, that Godlewski denied having had sex with DuBorgel while she was a minor and that he denied pleading guilty to doing so." (Plaintiff's Brief, p. 27.) Significantly, Plaintiff's brief contains no citation to the evidentiary record to support the assertion. That is because it did not happen. (The text messages between Godlewski and Kelly are attached hereto and marked as **Exhibit "A"**.) The text messages between Godlewski and Kelly contain no denial from Godlewski. Plaintiff has not produced any evidence from the criminal case file with the Clerk of Courts proving he pled guilty for non-sexual conduct. The criminal complaint clearly alleges Godlewski had sexual intercourse with a minor. The Information, which was prepared to get Plaintiff's guilty plea deal in front of a Court of Common Pleas Judge, is vague. It just says Plaintiff had "inappropriate text messages and contact with a minor." (See **Exhibit "18"** from Defendants' Brief.) The Information document does not describe the "contact." This does not prove he did not have sexual contact with the minor or that he did not plead guilty to corruption due to sexual contact. Plaintiff's story about why he pled guilty (Defendants' Brief, pp. 20-21.) is a farce. No one would believe it. It describes no "contact" by him with the minor. It only describes communications. His testimony that he pled guilty to corruption because he should not have had "consoling-type conversations" with the minor is incredible.

In his guilty plea colloquy Plaintiff admitted he did the thing he was charged with. (See **Exhibit "2"** from Defendants' Brief, pp. 235-241, specifically p. 240.) Kelly relied upon criminal court records and the archived news articles from the Times-Tribune reporter who covered Godlewski's guilty plea hearing and he spoke to people in law enforcement who corroborated the information in the article. (See **Exhibit "44"**, from Defendants' Brief, page 60-63.) There is no evidence, let alone clear and convincing evidence, that Defendants subjectively

entertained serious doubts about whether Godlewski had sex with a minor or that his sexual contact caused him to plead guilty. There are no verifiable denials from Godlewski prior to publication of the article. There is a factual basis to support Kelly's statements about the 2010-2011 criminal case in the article. One need only look at the affidavit of probable cause attached to the criminal complaint and the 2011 article written by Denis O'Malley which was archived at the Times-Tribune. (See Exhibits "3" and "12" (pages marked ST 620-622) from Defendants' Brief.) Kelly testified he read both these documents pre-publication. There are no unexplained distortions in the article. There is no evidence of departures from acceptable journalism procedures. There is no evidence of failure to employ affective editorial review. The actual editor's involvement in the article is even mentioned in the body of the article. (See Exhibit "1" from Defendants' Brief, ¶ 21.) Plaintiff neglected to depose any of the editors involved in the article.

Plaintiff has the burden of proof since he is a public figure. His proof is woefully inadequate to continue this case to trial. At this juncture it is in the Court's hands as the expositors of the Constitution to independently decide whether the evidence in the record presents clear and convincing evidence of actual malice. Plaintiff has not met this heavy burden of proof and therefore judgment should be entered for Defendants on all of Plaintiff's defamation claims and on his right to privacy claim.

(b) As a matter of law, Defendants' statements that Plaintiff is a "purveyor of a poison" and "calls out the cadence" for the Q movement are protected opinions or not defamatory

Plaintiff's brief asserts Kelly's article "makes numerous assertions of fact or implies the existence of undisclosed facts" and therefore the opinion defense is unavailable to Defendants. (Plaintiff's Brief, p. 10.) Plaintiff claims the article links him to January 6th riot at the Capital.

(Plaintiff's Brief, pp. 9-10.) In truth, the article links Plaintiff to Q-Anon and states QAnon followers were present at the Capitol on January 6th. (See **Exhibit "1"** from Defendants' Brief, ¶ 4.) The article specifically includes Godlewski's statement that he was not at the Capitol on January 6th. (See **Exhibit "1"** from Defendants' Brief, ¶ 7.) The basic premise of the article is contained in paragraphs 35 and 36 which reads:

"And if you hold yourself up as a "patriot reporter" who tells truths that can't be found anywhere else, don't traffic in lies. Godlewski's lies have consequences beyond his immediate family. Millions of Americans have lost parents, grandparents, siblings, children and friends to the QAnon cult. They watched in helpless horror as their loved ones were led down rabbit holes from which they may never return."

The statements about Godlewski's lies having consequences is clearly Kelly's opinion. Plaintiff has not presented any evidence countering Kelly's opinions or the facts upon which they are based. He has failed to prove this opinion is false as required by *Phila. Newspapers v. Hepps*, 475 U.S. 767, 770 (1986) or that Kelly entertained serious doubts about the truth of his opinion. Furthermore, a simple expression of opinion based on disclosed or assumed nondefamatory facts is not itself sufficient for an action of defamation, no matter how unjustified and unreasonable the opinion may be or how derogatory it is. *Meyers v. Certified Guar. Co., LLC*, 221 A.3d 662, 671 (Pa. Super. 2019) A pure expression an opinion "is actionable only if it may reasonably be understood to imply the existence of undisclosed defamatory facts justifying the opinion." *Kurowski v. Burroughs*, 994 A.2d 611, 618 (Pa. Super. 2010). When the facts underlying the opinion are both true and fully disclosed, the opinion is not defamatory as a matter of law, regardless of whether the opinion is "annoying and embarrassing" to the plaintiff. *Id.* (citing *Neish v. Beaver Newspapers, Inc.*, 581 A.2d 619, 622-24 (Pa. Super. 1990). Kelly's opinion about the damage caused to people in the QAnon cult is subject to the full protection of the law as his legally-protected opinion.

(c) Plaintiff's defamation claims must be dismissed since Plaintiff has failed to produce any evidence of harm to his reputation

The Plaintiff must demonstrate whether the statements in the article tend to so harm his reputation of another as to lower him in the estimation of the community or to deter third parties from associating or dealing with him. *Tucker v. Philadelphia Daily News*, 377 Pa. 598, 615, 848 A.2d 113, 124 (2004). The Pennsylvania Supreme Court has held, "it is not enough that the victim of the [statements] . . . be embarrassed or annoyed, he must have suffered the kind of harm which has grievously fractured his standing in the community of respectable society." *Id.* However, as the Pennsylvania Superior Court has declared, "Injury to reputation is judged by the reaction of other persons in the community and not by the *party's self-estimation.*" *Dougherty v. Boyertown Times*, 547 A.2d 778, 783 (Pa. Super. 1988) (emphasis added).

Godlewski has not identified anybody who read the article, believed the alleged false statements about him and treated him negatively. (See **Exhibit "2"** from Defendant's Brief, p. 312.) Godlewski simply claims his damages are "unquantifiable" and he is suing for the harm to his family and his potential loss of business. (See **Exhibit "2"** from Defendants' Brief, p. 208.) He has lost sight of the fact that all his claims for economic damages have already been dismissed and none of his family members are parties in this case. The Pennsylvania Defamation Statute, 42 Pa.C.S.A. § 8343 (a), mandates that Plaintiff prove recipients of the alleged defamatory statement understood its defamatory meaning. Pa.C.S.A. § 8343 (a)(4). Incredibly, Plaintiff's counsel makes the following erroneous statement in his brief:

"There is no genuine dispute of material fact that recipients understood, or could understand the content of the column to be defamatory as the content accuses Godlewski of having illicit sex with a minor, implies his unfitness to be a realtor, and asserts that Godlewski bears responsibility for the January 6 insurrection and has ruined the lives of countless people." (Plaintiff's Brief, p. 13.)

Defendants' motion for summary judgment is based in part on Plaintiff's lack of any proof about harm to his reputation. (Defendants' Brief, pp. 52-57.) Plaintiff has failed to produce any evidence that third parties thought less of him after reading the article or stopped associating or dealing with him after reading the article. He has not produced any evidence he has suffered the kind of harm which has "grievously fractured" his standing in the community as required by law. (Defendants' Brief, p. 44.).

Notably, there were multiple news articles and television news reports that publicized the criminal sex charges filed against Godlewski and his guilty plea on the corruption of minor's charge prior to the 2021 article. Plaintiff also testified that a local real estate agent and her husband sent a packet of articles, his arrest photo, and a hand written letter calling him a pedophile to every resident in Lackawanna County in 2015. (See **Exhibit "2"** from Defendants' Brief, p. 270-272.) Plaintiff needs to prove the article in question damaged his reputation from the viewpoint of third persons. It is conceivable the article did not change anybody's mind about Godlewski. He has not provided any evidence indicating what third parties thought of him after reading this article. Plaintiff himself circulated the Kelly article to thousands of people on social media the day it was published along with a message that stated Kelly "took the bait." (See **Exhibit "B"** from Defendants Motion for Summary Judgment.) Plaintiff used the article to gain followers on social media.

II. Conclusion

Plaintiff's brief in opposition to the motion for summary judgment contains not one word about the bribe Godlewski offered to the minor victim during the time this lawsuit was pending. (Defendants' Brief, p. 29.) His defense remains "deny, deny, deny." Plaintiff wrote to his followers on social media he will prove "beyond a shadow of a doubt in court" the text messages produced by the DA's office were not sent by him. (See **Exhibit "28"** from Defendants Brief.) Defendants produced the victim's mother's phone bills which contain a time entry for each text

message produced by the DA's office. (See **Exhibit "23"** from Defendants' Brief.) They match perfectly. Godlewski's phone number is all over the text messages produced by the DA's office.

In a depraved effort to manipulate the minor victim, Godlewski sent her the following texts on May 28, 2022 during this lawsuit:

Phil: I agree. ***But it's a very delicate situation***, and unless it's handled properly by both of us, we stand to benefit absolutely nothing. And there is a ***financial windfall here***, if handled properly. That's all I can really say through text. I don't trust those motherfuckers and I am literally foaming at the mouth to take them down once and for all. (See ST 1468)

Phil: You're a good person, Brie. You don't deserve anything that's happened to you since we met all of those years ago. And I think it's time ***to set the record straight***, and ***shove our collective middle fingers directly up their fucking assholes*** (See ST 1469)

(See **Exhibit "4"** from Defendants' Brief.)

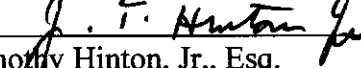
Godlewski actually tried to get the victim to think he was bringing the lawsuit for her benefit claiming the article somehow harmed her. He actually was soliciting her to commit a crime – perjury. This type of control worked for him in 2011 when the victim was a minor. It did not work this time. The victim is now 30 years old. Plaintiff committed perjury at the Court hearing on February 6, 2023 when he claimed these texts had nothing to do with The Scranton Times or his lawsuit. Plaintiff's depravity is on full display in black and white in his 2021-2022 text messages with the victim. He admits he sent these messages. They did not come from him in discovery. He deleted them from his phone, even though the lawsuit was pending and Defendants had requested them in discovery. Furthermore, a preservation of evidence demand letter was sent to Plaintiff's counsel at the commencement of the case. Plaintiff should have immediately discontinued the lawsuit when the victim provided the text messages to defense counsel.

Most public figure/public official cases are dismissed prior to trial due to the rigorous actual malice burden of proof on the plaintiff. Defendants have cited to a litany of such cases in their main brief. (Defendants' Brief, pp. 38-40.) The statements of fact and opinion in the article are all subject to the actual malice standard. Plaintiff has not offered clear and convincing evidence to satisfy his burden of proof that Defendants published false and defamatory statements about him with actual malice. Furthermore, Kelly's opinions in the article are entitled to "opinion" protection under the law. Finally, Plaintiff's self-estimation of the "unquantifiable" damage to his reputation from the article is insufficient to prove his claims as a matter of law. For the reasons stated herein and in Defendants' main brief, Plaintiff's case should be dismissed.

RESPECTFULLY SUBMITTED,

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CERTIFICATE OF COMPLIANCE

I hereby certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

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UNIFIED JUDICIAL SYSTEM
RECORDS CIVIL DIVISION

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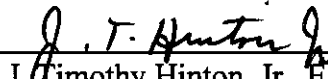
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CERTIFICATE OF SERVICE
.....

I hereby certify that on this 19th day of March 2024, I caused to be served by electronic mail, a true and correct copy of the foregoing Defendants' Reply Brief to Plaintiff's Opposition of Defendants' Motion for Summary Judgment upon all parties:

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Thursday, Feb 11 • 4:24 PM

Texting with Phil (SMS/MMS)

Phil Godlewski, your mailbox is full. This is Chris Kelly from The Times-Tribune. I'm hoping to chat with you about your prominence in the QAnon community and where you think it's heading now that the Storm fizzled out.

P Sorry Chris, no comment. Thanks for reaching out 👍

That's disappointing. I just watched your latest video and I'm intrigued by some of the things you said. Please reconsider.

P I don't like how the Tribune spins stories to their liking. You guys take words and phrases out of context. If even for 1 second I thought my words & beliefs would be accurately articulated, I would be happy to interview. But I know that's not going to happen. Sorry man.



That's a copout, but suit yourself.



That's a copout, but suit yourself. Andrew Torba recorded our conversation. You can too. Either way, I'm writing about this for Sunday.

P

Yeah I heard the Torba interview. Thanks for bringing the Q movement to local reporting. Good luck with the article 👍

If you talk to me, I won't need luck. I'm offering you an opportunity to bring the movement to local reporting and my consent to record the interview. How can you pass that up?

P

Because I fully believe your article will somehow be a purposeful attempt to cast a negative light on the movement, just as the rest of MSM has done in recent months. All of the things I say will be dissected into oblivion, and only the "crazy sounding" things will make the article. It'll ultimately be painted to make me look insane, and my family will ultimately suffer in the future. I can't take that chance.

Fine. Let me know if you change your mind. And  whine if you don't like how it turns out.

Because I fully believe your article will somehow be a purposeful attempt to cast a negative light on the movement, just as the rest of MSM has done in recent months. All of the things I say will be dissected into oblivion, and only the "crazy sounding" things will make the article. It'll ultimately be painted to make me look insane, and my family will ultimately suffer in the future. I can't take that chance.

P

Fine. Let me know if you change your mind. And don't whine if you don't like how it turns out.

P

I won't. Thanks man

Do yourself a favor. You'll sound smarter than the average MSM reporter.

Stop using the term "QAnon". There is no such thing as "QAnon". There is Q, and then there are Anons (followers). The movement is called "The Great Awakening". The term QAnon immediately makes you sound like you have no idea what you're talking about, right out the gate.

P



Text message



← Phil Godlewski Team    

Friday, Feb 12 • 9:08 AM

I've been watching your videos and I have to ask: Do you really believe the things you say, or are you just in it for the attention? If the former, why not defend your beliefs on the record? If the latter, why pass on an opportunity to showcase yourself?

I couldn't care less about attention. The reporting I do is because the average American Citizen can no longer get true information from the Main Stream Media. Between all platforms, I have over 75,000 followers that are depending on me for information that they can no longer get from their regular sources. I'm not the only citizen reporter. There are dozens of people like me, if not hundreds. If I wanted to "showcase myself" in your words (not mine), I would have jumped at the opportunity to do your interview. It's not about that. It's about the truth.

Again, Chris, no disrespect to you, but I know you're following an agenda. The theme of your article is already set for you. You can't go against the MSM (negative with your reporting, because you'll either 1.)



Text message



4:12



63%

← Phil Godlewski Team    

I couldn't care less about attention. The reporting I do is because the average American Citizen can no longer get true information from the Main Stream Media. Between all platforms, I have over 75,000 followers that are depending on me for information that they can no longer get from their regular sources. I'm not the only citizen reporter. There are dozens of people like me, if not hundreds. If I wanted to "showcase myself", in your words (not mine), I would have jumped at the opportunity to do your interview. It's not about that. It's about the truth.

Again, Chris, no disrespect to you, but I know you're following an agenda. The theme of your article is already set for you. You can't go against the MSM narrative with your reporting, because you'll either 1.) get fired, or 2.) lose credibility with what the Tribune (or you) think is their "primary audience". Little do you know, your primary focus on subscribers should be people like me, who seek the truth and no longer listen to the garbage MSM narrative. The focus shouldn't be on the ones the Tribune wants your article to appeal to. Understand that's not your job, but that's the reason I cannot do the interview. Your



Text message



← Phil Godlewski Team

When did you graduate Harvard?
What is your degree?

I just stumbled onto your legal troubles -- the underage girl and the Marriott check thing. They speak to your credibility and will likely be in my column. Didn't want to blindside you.

That shows your character as a journalist. Take care Chris. You just lost all respect and credibility with me.



Understood.

Friday, Feb 12 • 12:48 PM

Were you at the Capitol on Jan. 6?

No I wasn't but Chris, please stop messaging me. Bringing up my past only serves you, and your company. It will cause turmoil for my young children and my family. I don't want to hear from you again. Go continue your self serving nature. Karma always has a way when it comes to people that do [down arrow] and of stuff to me



Text message



Friday, Feb 12 • 12:46 PM

Were you at the Capitol on Jan. 6?



No I wasn't but Chris, please stop messaging me. Bringing up my past only serves you, and your company. It will cause turmoil for my young children and my family. I don't want to hear from you again. Go continue your self serving nature. Karma always has a way when it comes to people that do that kind of stuff to me

Sunday, Feb 14 • 10:55 AM



I'm sure you've realized this by now, but your article today is already having the reverse affect of what you intended. You slandered me in that article, and I'll be suing both you personally, as well as Times Shamrock, for Libel.

My attorney is Lin Wood. My 100,000+ followers are funding my legal costs.

Great job, Chris. I warned you about that Karma thing. You started an unnecessary battle that you can't win.

Feb 14, 10:55 AM



Text message

