

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

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THE INSTITUTE FOR GULF AFFAIRS
P.O. Box 262
McLean, Virginia 22101

and

Civil Action No.: _____

ALI AL-AHMED
P.O. Box 262
McLean, Virginia 22101

Plaintiffs,

-against-

THE SAUDI AMERICAN PUBLIC
RELATION AFFAIRS COMMITTEE
1101 30th Street N.W., Suite 315
Washington, D.C. 20007

and

SALMAN AL-ANSARI
1101 30th Street N.W., Suite 315
Washington, D.C. 20007

Defendants.

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COMPLAINT

Plaintiffs, THE INSTITUTE FOR GULF AFFAIRS (“IGA”) and ALI AL-AHMED (“Al-Ahmed”) (collectively, “Plaintiffs”), by and through their attorneys, Gerstman Schwartz LLP, complaining of the Defendants THE SAUDI AMERICAN PUBLIC RELATION AFFAIRS COMMITTEE (“SAPRAC”) and SALMAN AL-ANSARI (“Al-Ansari”) (collectively, “Defendants”), set forth and alleges as follows:

PRELIMINARY STATEMENT

1. This action arises from the defamatory statements published by Defendants against Plaintiffs during an interview conducted by a blogger named Spencer Tripens with Defendant Al-Ansari, who called Plaintiff Al-Ahmed a “terrorist” and Plaintiff IGA “dangerous” and promoting “[its] own brand of terrorism,” which was then disseminated throughout the world and caused Plaintiffs severe emotional, reputational and financial harm.

2. Although, upon information and belief, actionable defamatory statements were not published prior to June 7, 2018, Defendants have been peddling lies about Plaintiffs for years. On its face, Defendant SAPRAC, under the leadership and control of its founder, Defendant Al-Ansari, claims to be “an organization that aims to further strengthen the historic relationship between Saudi Arabia and the United States, both politically and economically.”¹ When this façade is unmasked however, the purpose of Defendant SAPRAC’s existence is revealed to be solely to advance the interests of Saudi Arabia in controlling the flow of information concerning Saudi Arabia, which, upon information and belief, is a benefactor of Defendant SAPRAC.² To accomplish this goal, Defendants are responsible for delivering content pertaining to Saudi Arabia to audiences through propagandized “academic papers, videos, motion graphics, and short documentaries.” Whether the information that Defendants publish in advancing Saudi Arabia’s public image contains a modicum of truth is not made a priority.

3. Defendants’ ideals have put them in direct conflict with the progressive ideals of Plaintiff Al-Ahmed and the non-partisan organization that he founded, Plaintiff IGA, which “disseminates solid information about the Gulf region and produces thoughtful analyses of Gulf

¹ *About Us*, Saudi American Public Relation Affairs Committee (last visited June 29, 2018), <https://www.saprac.org/about-us.html>.

² Upon information and belief, Defendant SAPRAC is funded by the Crown Prince and First Deputy Prime Minister of Saudi Arabia, Mohammad bin Salman.

politics and international relations.”³ In carrying out this mission, Plaintiffs have published articles to inform people of crises in the Gulf countries, including Saudi Arabia, and have worked with policymakers on figuring out solutions to the issues that plague this volatile sector of the world.

4. Up until, and continuing through the defamatory statements underlying the instant action, Defendants have sought to undermine Plaintiffs and the platforms they represent through a campaign of spewing vitriol about Plaintiffs. The defamatory statements are a culmination of these efforts.

JURISDICTION AND VENUE

5. This Court has subject-matter jurisdiction over all claims alleged herein pursuant to D.C. Code Annotated, 1981 edition, *as amended*, Sec. 11-921(a).

6. This Court has personal jurisdiction over Defendants as to all claims alleged herein pursuant D.C. Code Annotated, 1981 edition, *as amended*, Secs. 13-422 and 13-423(a) as Defendant SAPRAC maintains its principal place of business in the District of Columbia and Defendants caused tortious injury to Plaintiffs by publishing defamatory statements in the District of Columbia.

7. Venue properly lies in this Court because Defendants are located in the District of Columbia and this action concerns Defendants’ activities within the District of Columbia.

PARTIES

8. Plaintiff IGA is a non-partisan organization and independent think tank with its principal place of business in Mclean, Virginia. Plaintiff IGA provides analyses and opinions covering issues surrounding the Gulf countries and relations between the Gulf Region and the

³ *Overview*, Institute for Gulf Affairs (last visited June 29, 2018), <https://www.gulfinstitution.org/about/iga-overview/>.

United States and connects policymakers and the media with reliable analysts on the subject matter.

9. Plaintiff Al-Ahmed is the founder and director of Plaintiff IGA. In this capacity, Plaintiff Al-Ahmed is responsible for personally appearing on television networks and publishing articles that cover major issues surrounding the Gulf Region, including Saudi Arabia.

10. Defendant SAPRAC is a pro-Saudi Arabia lobbying and public relations organization with its principal place of business in Washington, District of Columbia. Defendant SAPRAC seeks to improve the public image of Saudi Arabia by producing written and visual forms of information to a United States-based audience.

11. Defendant Al-Ansari is the founder and president of Defendant SAPRAC. In this capacity, Defendant Al-Ansari has made numerous television appearances and written articles that advance the interests of Defendant SAPRAC and, consequently, Saudi Arabia. In the scope of his duties to Defendant SAPRAC, on June 7, 2018, through Spencer Tripens, Defendant Al-Ansari published defamatory and thoroughly damaging statements, calling Plaintiff Al-Ahmed a terrorist and Plaintiff IGA dangerous through publishing “[its] own brand of terrorism.” Defendant Al-Ansari knew that these preposterous accusations were false, or acted with substantially disregard as to their truth or falsity. There was no evidence supporting these false accusations but this was no concern to Defendant Al-Ansari, whose purpose in publishing these statements was to get revenge against Plaintiffs, while also damaging an organization whose statements concerning Saudi Arabia conflicted with the goals of Defendants.

FACTUAL ALLEGATIONS

12. On May 20, 2018, Plaintiffs published an article titled “Is SAPRAC A Wolf In Sheep’s Clothing?” In this article, Plaintiff Al-Ahmed noted that Defendant SAPRAC has a

“questionable stance on tolerance, especially against Jews and are associated with virulent anti-Semitism.”⁴ Upon information and belief, Defendant Al-Ansari was offended by this article and sought retribution.

13. On or about May 28, 2018, a blogger named Spencer Tripens interviewed Defendant Al-Ansari for an article he was publishing. Upon information and belief, Defendant Al-Ansari decided that during this interview he would enact his revenge against Plaintiffs for their earlier article while also spreading false information about an organization that did not discuss Saudi Arabia in a manner that Defendants approved of.

14. These nefarious goals became clear when, in answering a question from Mr. Tripens, Defendant Al-Ansari stated that Plaintiff Al-Ahmed “is a terrorist himself” who “cares nothing for the sincere shared collective of ideas and cultures, but [Plaintiff Al-Ahmed] will use any means to exterminate the prospects of a peaceful world.”⁵ If that were not enough, Defendant Al-Ansari followed up this entirely false and damaging statement by claiming that “[Plaintiff Al-Ahmed] and his cronies at [Plaintiff IGA] are dangerous - they have much more going on here other than simple written words - they are subversive and will use any destructive means possible to promote their own misguided agenda of their own brand of terrorism.”

15. Finally, Defendant Al-Ansari decided to use Plaintiffs’ May 20, 2018 article against them as a final act of retribution, stating “this is a perfect example of a Wolf in Sheep’s clothing – [Plaintiff Al-Ahmed] might dress in public like a docile Sheep, but, in truth, he is a Wolf - he will destroy anything in his path, even if he has to kill it to get there.”

⁴ *Is SAPRAC A Wolf In Sheep’s Clothing?*, Institute for Gulf Affairs (last visited June 29, 2018), <http://www.gulfinstitutetv.org/is-saprac-a-wolf-in-sheeps-clothing/>.

⁵ *Beyond Rhetoric – Who is a Terrorist?*, Cross.tv (last visited June 29, 2018), <http://www.cross.tv/blog/108681>.

16. On June 7, 2018, Mr. Tripens published these statements in an article titled, “Beyond Rhetoric – Who is a Terrorist?” (annexed hereto as “**Exhibit A**”).

17. These statements describing Plaintiffs could not be further from the truth. Plaintiff Al-Ahmed has never engaged in any activities that would link him to any terrorist organization, nor has he ever condoned any acts of terror. Similarly, Plaintiff IGA has never conducted itself in a way that would lead any person to believe that it engaged in any terrorist activities nor has it ever condoned any acts of terror.

18. Nor was there any basis for Defendant Al-Ansari to believe that Plaintiff Al-Ahmed himself was a terrorist, nor any basis to believe that Plaintiff IGA promoted terrorism. These statements were published to damage the reputation of Plaintiffs in retribution for their earlier article and to lessen the community’s respect for a think tank that shared information casting Saudi Arabia in a negative, but truthful, light.

19. By cause of Defendants’ publication of these defamatory statements that they knew to be untrue and/or published it with a disregard to its truth or falsity, Plaintiffs sustained significant reputational, financial, and emotional damages. In particular, the publishing of these statements caused Plaintiff IGA to lose the respect of the politicians and organizations whose contributions helped it remain upright monetarily, and has caused Plaintiff Al-Ahmed, a man now broken and despised by people worldwide, substantial grief and mental anguish for being allegedly affiliated with terrorist organizations.

FIRST CAUSE OF ACTION

Intentional Tort – Defamation Per Se (As against both Defendants)

20. Plaintiffs repeat, reiterate, and re-allege each and every allegation above as though set forth herein.

21. In order to state a cause of action for defamation, a plaintiff must allege that the defendant published a false and defamatory statement concerning the plaintiff, where the defendant's fault in publishing this statement amounted to at least negligence, and actual or special damages resulting from the publishing of the defamatory statement. When the plaintiff is a public figure, he must also allege that the defamatory statement was made with actual malice, meaning that the party who published the statement knew it was false or acted with reckless disregard to its truth or falsity.

22. Further, a cause of action for defamation per se is stated when the false statements utterly injure a plaintiff in his trade, business, or profession or accuse him of committing a criminal offense. When this occurs, the plaintiff does not need to show that actual damages resulted from the publishing of the defamatory statement.

23. Through their publishing of these statements in the interview with Mr. Tripens, which was then released to an international audience, Defendants published several false and defamatory statements concerning Plaintiffs. In addition, these statements injured Plaintiff IGA in its business as an organization whose success is based in part on connections built with United States policymakers, and accused Plaintiff Al-Ahmed of committing terrorist acts, which is a serious crime.

24. Namely, Defendants published statements calling Plaintiff Al-Ahmed a "terrorist," which was an entirely baseless and salacious accusation, and calling Plaintiff IGA a "dangerous" organization that "will use any destructive means possible to promote [its] own misguided agenda of [its] own brand of terrorism."

25. Defendants knew that these statements were false or acted with reckless disregard in determining whether it was true or false. These statements were published in retribution for Plaintiffs' earlier article and to destroy Plaintiffs' credibility in the global community.

26. By reason of the foregoing acts of Defendants, Plaintiffs sustained, and will continue to sustain, serious economic, financial, reputational, and emotional damages, in particular to their ability to work with policymakers and advertise their platforms and to Plaintiff Al-Ahmed's mental health as an individual being labeled as a "terrorist" in a country where people already conflate the notions of having origins in a Middle East country and working for a terrorist organization.

SECOND CAUSE OF ACTION

Intentional Tort – False Light Invasion of Privacy (As against both Defendants)

27. Plaintiffs repeat, reiterate, and re-allege each and every allegation above as though set forth herein.

28. In order to state a cause of action for false light invasion of privacy, a plaintiff must allege that the defendant publically disclosed a false statement concerning the plaintiff that would be highly offensive to a reasonable person. When the plaintiff is a public figure, he must also allege that the statement was made with actual malice, meaning that the party who published the statement knew it was false or acted with reckless disregard to its truth or falsity.

29. Through their publishing of these statements in the interview with Mr. Tripens, which were then released to an international audience, Defendants publically disclosed false statements concerning Plaintiffs.

30. Namely, Defendants published statements calling Plaintiff Al-Ahmed a “terrorist” and Plaintiff IGA an organization with an agenda of promoting terrorism, which were entirely baseless and salacious accusations.

31. Defendants knew that these statements were false or acted with reckless disregard in determining whether they were true or false. These statements were published by Defendants in order to seek retribution and to destroy Plaintiffs’ credibility in the global community.

32. In addition, a reasonable person would certainly be offended by this statement. The very notion of being labeled a terrorist carries significant implications in this country, as people already conflate the notions of having origins in a Middle East country and working for a terrorist organization.

33. By reason of the foregoing acts of Defendants, Plaintiffs sustained, and will continue to sustain, serious economic, financial, reputational, and emotional damages, in particular to their ability to work with policymakers and advertise their platforms and to Plaintiff Al-Ahmed’s emotional health as an individual being labeled as a “terrorist” in a country where people already conflate the notions of having origins in a Middle East country and working for a terrorist organization.

THIRD CAUSE OF ACTION

Intentional Tort – Intentional Infliction of Emotional Distress (As against both Defendants)

34. Plaintiffs repeat, reiterate, and re-allege each and every allegation above as though set forth herein.

35. In order to state a cause of action for intentional infliction of emotional distress, a plaintiff must allege that the defendant acted extremely and outrageously, which intentionally or recklessly caused the plaintiff severe emotional distress.

36. Through their publishing of these statements that labeled Plaintiff Al-Ahmed as a terrorist and Plaintiff IGA as an organization promoting terrorism, which had no basis in truth and implied that Plaintiffs were guilty of a most heinous crime, Defendants acted extremely and outrageously.

37. Defendants published these statements intentionally in order to seek retribution and to destroy Plaintiffs' credibility in the global community.

38. By reason of the foregoing acts of Defendants, Plaintiffs sustained, and will continue to sustain, severe emotional damages, from the pain of being labeled as a "terrorist" in a country where people already conflate the notions of having origins in a Middle East country and working for a terrorist organization.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, upon all of the facts and circumstances herein alleged, Plaintiffs respectfully request that this Court:

- A. Grant judgment against Defendants on each and every cause of action alleged herein;
- B. Grant an order awarding Plaintiffs damages in an amount to be determined at trial, together with interest and the costs and disbursements of this action, plus reasonable attorneys' fees, punitive damages, as well as any other damages permitted to be recovered by law pursuant to the above causes of action; and

C. Grant any such further relief as the Court deems just, proper, and equitable.

Dated: June 29, 2018
Garden City, New York

GERSTMAN SCHWARTZ LLP

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EXHIBIT A

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BEYOND RHETORIC - WHO IS A TERRORIST ?

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Jun 07, 2018

BY : Spencer Tripens

A firestorm has begun to rage between two competing Mid-East special interests groups.

Ali AlAhmed, a Saudi expert with the Institute of Gulf Affairs <https://www.gulf institute.org> (GULF), recently wrote about his concerns that the leadership of major Jewish organizations and the Washington Institute for Near East Affairs had foolishly allowed the Saudi American Public Relations Affairs Committee (SAPRAC) to be intimately involved in their major policy conference. AlAhmed noted that SAPRAC and its leader, Salmon Al-Ansari, have a "questionable stance on tolerance, especially against Jews and are associated with virulent anti-Semitism".

AlAhmed's pointedly noted that SAPRAC and its leader, AlAhmed, are completely controlled by his father, Abdulrahman Al-Ansari. He stated that Abdulrahman "has an extensive public animosity toward Judaism and in support of violent Islamic intolerance". Amongst other items, AlAhmed, cited Abdulrahman's social media postings admiring Hitler.

In response to AlAhmed's comments, Salmon Al-Ansari proclaimed, "AlAhmed is a terrorist himself". He added, AlAhmed "cares nothing for the sincere shared collective of ideas and cultures, but AlAhmed will use any means to exterminate the prospects of a peaceful world".

Through AlAhmed's words, GULF has called upon SAPRAC to unequivocally publically denounce Abdulrahman. In response, Al-Ansari said, "I will never denounce my father", declaring that "unconditionally, he is a great man and all of his efforts have been courageous." He added, "I won't turn against my great father - we enjoy mutual unconditional support - no matter what he does, I support him".

When asked about his Father's postings related to Hitler, Al-Ansari remarked, "my Father is pure, AlAhmed is a modern day Neo-Nazi".

Al-Ansari went on to declare that, in fact, "AlAhmed and his cronies at GULF are dangerous - they have much more going on here other than simple written words - they are subversive and will use any destructive means possible to promote their own misguided agenda of their own brand of terrorism". When pressed to explain further, AlAhmed remarked, "this is a perfect example of a Wolf in Sheep's clothing - AlAhmed might dress in public like a docile Sheep, but, in truth, he is a Wolf - he will destroy anything in his path, even if he has to kill it to get there".

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