

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Yolanda Orozco

1 Donna Bullock
2 Attorney at Law (SBN 109223)
3 800 W. 6th St., Ste. 1250
4 Los Angeles, CA 90017
5 Tel: (562) 726-0778
6 Fax: (562) 683-0319
7 donnabullockcarrera@yahoo.com

8 Attorney for Plaintiff JOE E. COLLINS III

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF LOS ANGELES
12

13 JOE E. COLLINS III,) Case No: 20STCV37401
14 Plaintiff,) COMPLAINT FOR DAMAGES FOR:
15 Vs.) 1. SLANDER
16) 2. LIBEL
17) 3. VIOLATION OF STATUTE, UNDER
18) PENAL CODE, SECTION 115.2 and
19) CIVIL CODE, SECTION 3344.6
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21) [Unlimited Civil Case]
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Plaintiff JOE E. COLLINS III alleges as follows:

1. Plaintiff JOE E. COLLINS III (“COLLINS”) is an individual, and a candidate for Congress, for the 43rd Congressional District of the State of California. Plaintiff COLLINS was one of three candidates in the primary election and a second-place finisher. Plaintiff qualified as a candidate for the general election on November 3, 2020, for the 43rd Congressional District of the State of California. Plaintiff COLLINS is a resident County of Los Angeles, State of California.
2. Defendant MAXINE WATERS (“WATERS”) is an individual, and the incumbent candidate for the 43rd Congressional District of the State of California. Defendant WATERS won one of the positions in the primary election, qualifying her as a candidate for the

1 general election on November 3, 2020 for the 43rd Congressional District of the State of
2 California. Defendant WATERS is a resident the County of Los Angeles, State of California.

3 3. Plaintiff is informed and believes that Defendant CITIZENS FOR WATERS
4 FEC Identification No. C0016758 (“CFW”), is either a candidate controlled committee as
5 defined in Government Code, Section 82016.5 for which Defendant WATERS is liable for libel
6 or slander of Plaintiff willfully or knowingly directed or permitted by her; or alternatively is a
7 sponsored committee as defined in Government Code, Section 82048.7 for which all sponsors
8 are liable for libel or slander of Plaintiff willfully or knowing directed or permitted by said
9 sponsor(s), as hereinafter alleged.

10 4. Plaintiff is ignorant of the true names and capacities of defendants sued herein
11 as DOES 1-200, inclusive, and therefore sues these defendants by such fictitious names.
12 Plaintiff is informed and believes that the Defendants sued as DOES 1-5, inclusive, are radio
13 stations broadcasting or committing republication of the defamatory statements of Defendant
14 WATERS as hereinafter alleged. Plaintiff is informed and believes that the Defendants named
15 herein as DOES 6 to 20, are the sponsors of any sponsored committee, including but not limited
16 to Defendant CFW who willfully or knowingly directed or permitted the libel or slander of
17 Plaintiff as hereinafter alleged. Plaintiff is further informed and believes that the Defendants
18 sued as DOES 21 to 200, inclusive are individuals who are committing publication, republication
19 or rebroadcast of the defamatory statements of Defendant WATERS as hereinafter alleged.
20 Plaintiff will amend this complaint to allege the true names and capacities of each Defendant
21 herein named as a DOE when ascertained. Plaintiff is informed and believes and thereon alleges
22 that each of the fictitiously named defendants is responsible in some manner for the occurrences
23 herein alleged, and that plaintiff’s damages as herein alleged were proximately caused by their
24 conduct.

25 5. Plaintiff is further informed and believes that Defendants DOES 6 to 200,
26 inclusive, are either persons or entities liable for libel or slander of Plaintiff COLLIN, by or on
27 behalf of Defendant WATERS and/or Defendant CFW under Civil Code, Section 43 et seq.,
28 made applicable under Elections Code, Section 20500, 20501 and related authority.

1 6. Defendants WATERS, CFW and DOES 1 to 200, inclusive, at all times
2 herein mentioned were the agents and employees of their codefendants and in doing the things
3 hereinafter alleged were acting within the course and scope of such agency and the permission
4 and consent of their codefendants.

5 7. At all times herein mentioned, Plaintiff COLLINS was, and now is, a
6 candidate for the 43rd Congressional District seat. Plaintiff COLLINS is a decorated Navy
7 veteran with 13.5 years in service having served in combat in Iraq. Plaintiff has enjoyed, at all
8 times except concerning the conduct of Defendants alleged herein, a generally good reputation in
9 the community at large. While serving in the Navy, Plaintiff COLLINS was an Aviation
10 Machinists Mate, First Class, and his last date in military service was October 27, 2017. Plaintiff
11 COLLINS served honorably in the United States Navy before he separated from service by
12 discharge, the character of which was UNDER HONORABLE CONDITIONS (GENERAL).
13 Plaintiff COLLINS' DD-214, which constitutes an official public document of the United States
14 Navy determinative of the conditions of Plaintiff COLLINS' separation from military service, is
15 attached hereto, marked as Exhibit "A" and a true and correct copy of which is incorporated
16 herein by this reference as though set forth in full at this point.

17 8. Plaintiff COLLINS served honorably for his entire 13.5 years in the United
18 States Navy, receiving decorations and commendations as follows:

- 19 a. Navy/MC Achievement Medal. The Navy & Marine Corps Achievement
20 Medal (NAM) is a decoration presented by the United States Department of
21 the Navy to service members of the U.S. Navy and Marine Corps who have
22 performed commendably in routine duties or exceptional achievements, that
23 have not been recognized by a higher award.
- 24 b. Navy/MC Commendation Medal. The Commendation Medal is a mid-level
25 United States military decoration presented for sustained act heroism or
26 meritorious service.
- 27 c. Navy "E" RBN 3. The Navy "E" Ribbon denotes permanent duty on U.S.
28 Navy ships, squadrons, or units (including construction battalions) that have
won a battle efficiency competition (Battle "E") after July 1, 1974

- 1 d. Navy Expeditionary Medal. The Navy Expeditionary medal is awarded to
2 the officers and enlisted men of the Navy who have actually landed on
3 foreign territory and engaged in operations against armed opposition, or
4 operated under circumstances which, after full consideration, shall be
5 deemed to merit special recognition and for which service no campaign
6 medal has been awarded.
- 7 e. National Defense Service Medal. The National Defense Service Medal
8 (NDSM) is a service award of the United States Armed Forces awarded to
9 every member of the US Armed Forces who have served during any one of
10 four specified periods of armed conflict or national emergency from 1950 to
11 the present.
- 12 f. Navy Recruiting Service Medal. The Navy Recruiting Service Ribbon is
13 awarded for the purpose of recognizing members of the United States Navy
14 who have served in one of the Navy's Major Recruiting Commands. The
15 award is presented after the completion of a successful 3 year tour of
16 service.
- 17 g. Rifle Expert Medal. The Navy Expert Rifle Medal is the highest award that
18 a Sailor can receive for a rifle qualification, upon the recipient having
19 achieved "expert" status with a qualified service weapon.
- 20 h. Pistol Shot Expert Medal. The Navy Expert Pistol Shot Medal is the
21 highest award that a Sailor can receive for a pistol qualification, upon the
22 recipient having achieved "expert" status with a qualified service weapon.
- 23 i. Enlisted Aviation Specialist Warfare Insignia. The Enlisted Aviation
24 Warfare Specialist (EAWS) insignia is a warfare badge of the US Navy, to
25 recognize those members of the Navy's enlisted force who have acquired
26 the specific professional skills, knowledge, and military experience that
27 result in qualification for service in the aviation activities of the Navy.

28 9. Plaintiff COLLINS separated from service with the United States Navy as a
decorated veteran, upon a General Discharge under Honorable Conditions. Plaintiff COLLINS

1 so separated to run for public office, which is not permitted while in active service. At no time,
2 was Plaintiff COLLINS “dishonorably discharged.” Plaintiff was given his military benefits and
3 has never been subject to court martial concerning his General Discharge under Honorable
4 Conditions from the United States Navy.

5
6 FIRST CAUSE OF ACTION

7 (LIBEL against Defendants WATERS, CFW and DOES 1 TO 200, Inclusive)

8 10. Plaintiff COLLINS refers to and incorporated by reference paragraphs 1 to 9
9 above, as though set forth in full at this point.

10 11. On or about September 17, 2020, in advance of the November 3, 2020 election for
11 the 43rd Congressional District seat between Plaintiff COLLINS and Defendant WATERS,
12 Defendants WATERS, CFW and DOES 1 to 200, inclusive, published a two sided piece of
13 campaign literature (the “Hit Piece”) in a colored card format, containing false and defamatory
14 statements about Plaintiff COLLINS military separation, a true and correct copy of which is
15 attached hereto as Exhibit “B” and incorporated herein by this reference, stating as follows:

16 “REPUBLICAN CANDIDATE JOE COLLINS was dishonorably discharged, played
17 politics, and sued the U.S. Military.

18 He doesn’t deserve military dog tags or your support.”

19 * *

20 (There is an unflattering picture of Plaintiff COLLINS, below which is a picture of
21 apparent military dog tags containing the following language):

22 “Republican Candidate Joe E. Collins III Dishonorably discharged from the U.S.
23 Navy”

24 12. On the reverse side of the Hit Piece is a flattering picture of Defendant WATERS
25 purporting to claim that she “continued . . . to fight in Washington to make sure our veterans
26 aren’t left behind. Veterans deserve the best this country has to offer, I’ll never stop fighting on
27 their behalf.” Defendant WATERS purports to support veterans while attacking Plaintiff
28 COLLINS by falsely stating he was “dishonorably discharged” defaming Plaintiff COLLINS,
who is a disabled combat Veteran.

1 13. All statements by Defendants WATERS, CFW and DOES 1 to 200 inclusive,
2 stating that Plaintiff COLLINS was dishonorably discharged from his military service are false
3 as it pertains to the Plaintiff. Plaintiff COLLINS is informed and believes, and thereon alleges,
4 that Defendant WATERS knew that this statement that Plaintiff COLLINS was “dishonorably
5 discharged” was false.

6 14. In or about 2018, Plaintiff COLLINS had sought the assistance from the office of
7 Congressperson Defendant WATERS for his own veterans’ benefits, and was ignored by the
8 staff and office of Defendant WATERS. Plaintiff COLLINS sued for his disability benefits, for
9 a 100% service-related injury as was the required procedure, was given a general discharge
10 under honorable conditions as stated in his DD-214 (Exhibit “A” hereto) and was given his
11 Veteran’s disability benefits and healthcare.

12 15. In or about 2018, Plaintiff COLLINS had met with the office members of Defendant
13 WATERS and provided actual direct information about his discharge status to Defendant
14 WATERS or those acting on her behalf in her official capacity as Congressperson for the 43rd
15 Congressional District. Defendant WATERS directly, or through her agents, employees and
16 those participating in her election campaign, knew from Plaintiff COLLINS request for
17 assistance with his veterans benefits from Defendant WATERS’ office and staff that he was not
18 “dishonorably discharged.” Defendants WATERS, CFW and DOES 1 to 200, inclusive, knew
19 Plaintiff COLLINS could not have been “dishonorably discharged” because Defendant
20 WATERS had admitted that she knew Plaintiff COLLINS received his veterans’ healthcare and
21 disability benefits, (See Second Cause of Action for Slander, wherein Defendant WATERS
22 admits personal knowledge that Plaintiff received his Veterans’ medical insurance benefits).
23 Medical benefits for Veterans are never given to persons “dishonorably discharged” from
24 military service. As Defendant WATERS personally knew Plaintiff COLLINS received
25 medical coverage from the Veterans’ Administration, Defendant WATERS knew or should have
26 known that Plaintiff COLLINS had never been “dishonorably discharged.” Defendant WATERS
27 made this false statement knowing it was false, or with actual malice in reckless disregard to
28 whether this statement was true or false.

1 16. Plaintiff COLLINS herein alleges, upon information and belief, that Defendant
2 WATERS, CFW and DOES 1 TO 200, inclusive, made these statements with actual malice. The
3 fact that Plaintiff COLLINS did not have a “dishonorable discharge” from military service is a
4 fact that is the subject of public record, available online to the general public. Defendant
5 WATERS is a member of Congress, with access to all military records through her congressional
6 office, and also with access to such records online as a member of the general public. Defendant
7 WATERS has a paid staff for her office, and has persons involved with her campaign, each of
8 whom could or should have verified the defamatory statement that Plaintiff COLLINS was
9 “dishonorably discharged” from official and public records of the United States Navy before the
10 false and defamatory statement was incorporated into the Hit Piece, radio advertisements and
11 other means to publish, or republish the defamatory statement, by direct distribution or mailing
12 to the voters for the 43rd Congressional District or other means of distribution.

13 17. Plaintiff is informed and believes that the Hit Piece was published, distributed
14 and/or directly electronically e-mailed by Defendants WATERS, CFW and DOES 1 to 200,
15 inclusive, to persons who are voters in and around the 43rd Congressional District, for the
16 specific purpose of defaming Plaintiff COLLINS to the general public, to sway the votes away
17 from Plaintiff COLLINS and in favor of Defendant WATERS by use of false representations of
18 the public records of his military discharge, and to deceive the registered voters for the subject
19 November 3, 2020 election. The campaign advertisements, including but not limited to the Hit
20 Piece and radio advertisements, specifically targeted voters who are veterans or in active military
21 service, their families, friends and supporters.

22 18. The statement that Plaintiff COLLINS was “dishonorably discharged” was
23 intended to subject Plaintiff to hatred, contempt, ridicule, and obloquy because it was directed to
24 Veterans, family and friends of Veterans, supporters of Veterans and all voters of the 43rd
25 Congressional District and the general public. Plaintiff COLLINS’ election platform was based
26 upon his commitment to years in military service as a decorated disabled combat Veteran. The
27 defamatory statement that he was “dishonorably discharged” was intended to convince voters
28 with false statements about public records of the Navy, that Plaintiff was purportedly unfit for
public office. Persons in military service or interested therein, know that a dishonorable

1 discharge only occurs after a court martial. A court martial takes place for illegal acts committed
2 during military service. To charge Plaintiff with a dishonorable discharge carries the defamatory
3 meaning to falsely claim that Plaintiff is not fit for public office, falsely charges a dishonest
4 character, falsely accuse Plaintiff of concealing information about said false claim of
5 “dishonorable discharge”, falsely accuses Plaintiff of the commission of bad acts during military
6 service, and is otherwise defamatory per se. Plaintiff was never dishonorably discharged, and
7 Defendant WATERS committed acts of defamation against Plaintiff for the purpose of deceiving
8 voters against voting for Plaintiff COLLINS, with false statements made by Defendants
9 WATERS, CFW and DOES 1 to 200, made with actual malice, or which they knew were false at
10 the time the statements were made.

11 19. The above described publication was not privileged because Defendant WATERS,
12 CFW and DOES 1 to 200, made these statements, directed these statements be made, published
13 and/or republished these statements, or permitted these statements to be made, in direct violation
14 of Penal Code, Section 115.2, which states that “(n)o person shall publish or cause to be
15 published, with actual knowledge, and intent to deceive, any campaign advertisement containing
16 false or fraudulent depictions, or false or fraudulent representations, of official public documents
17 or purported official public documents.” The false statement that Plaintiff COLLINS was
18 dishonorably discharged from the Navy, was a publication made by or on behalf of Defendant
19 WATERS to sway voters away from Plaintiff COLLINS and to Defendant WATERS using false
20 information, about Plaintiff’s military discharge character, in campaign literature, materials,
21 advertisements and communications with voters. Defendants WATERS, CFW and DOES 1 TO
22 200, inclusive, committed criminal violation of Penal Code, Section 115.2 made actionable under
23 Civil Code, Section 3344.6.

24 20. The above-described publication was not privileged because it was unlawful
25 conduct, and/or because Defendants WATERS, CFW and DOES 1 to 200, inclusive, published it
26 with personal animosity, hatred, and/or ill will toward Plaintiff COLLINS to unfairly win the
27 election, and with either the knowledge that it was false or with actual malice having no
28 reasonable grounds for believing that this statement was true and intentionally failing to verify
the public records. The statement that Plaintiff COLLINS was dishonorably discharged, after

1 13.5 years of military service, a decorated disabled Veteran of the war in Iraq, and a candidate
2 for the 43rd Congressional District seat, is defamatory on its face because it falsely charges
3 plaintiff with dishonesty, and falsely infers that he may have committed some crime resulting in
4 a court martial leading to “dishonorable discharge.”

5 21. This false statement that Plaintiff COLLINS was dishonorably discharged has a
6 tendency to injure Plaintiff COLLINS in his occupation of running for political office, because
7 it impugns his character, falsely challenges his commitment to the United States from his lengthy
8 military service, holds him up to hatred and resentment from Veterans and supporters of the
9 military, and falsely charges him with other characteristics intended to convince voters of
10 “unfitness for public office” based upon false statements about his military service record.

11 22. As a proximate result of the above-described publication, Plaintiff COLLINS has
12 suffered loss of his reputation, shame, mortification, and hurt feelings all to his general damage.

13 23. As a further proximate result of the above-described publication, Plaintiff may
14 have suffered special damages from the loss of voters in the upcoming November 3, 2020
15 election, all to his injury.

16 24. The above-described publication was published by the Defendants WATERS,
17 CFW and DOES 1 to 200, inclusive, with malice, oppression and fraud in that Defendants either
18 recklessly made the statement that Plaintiff COLLINS was dishonorably discharged without
19 regard for the truth or falsity of this fact contained in public records of the United States Navy,
20 available online, available to Defendant WATERS with special access to military records as a
21 member of Congress or through her staff or election workers, and thus Plaintiff seeks an award
22 of punitive damages.

23
24 SECOND CAUSE OF ACTION FOR SLANDER

25 (Against Defendant WATERS and DOES 1 to 200, inclusive)

26 25. Plaintiff COLLINS refers to and incorporated by reference paragraphs 1 to 10,
27 inclusive, and Paragraphs 13-24, inclusive, as though set forth in full at this point.

28 26. On or after September 17, 2020, and repeated daily in the ongoing campaign radio
advertisements of Defendant WATERS, done in advance of the November 3, 2020 election,

1 Defendant WATERS as the incumbent candidate, has published through radio broadcast a
2 campaign advertisement, in her own voice, stating as follows, in pertinent part:

3 “ . . . Joe Collins had his health care paid for serving in the Navy. He even tried to run for
4 president while serving in the Navy. Joe Collins was kicked out of the Navy and was
5 given a dishonorable discharge. Oh yes, he was thrown out of the Navy with a
6 dishonorable discharge.

7 Joe Collins is not fit for office and does not deserve to be elected to public office.

8 Please vote for me. You know me. This is Congresswoman Maxine Waters and I
9 approve this message.”

10 27. The above-referenced radio advertisement contains other statements by Defendant
11 WATERS, which are also false and deceptive, but which may be considered as mere political
12 opinion and so not alleged as actionable in this Complaint. Although the rest of the radio
13 advertisement is not accepted or acceptable to Plaintiff COLLINS, this Complaint for defamation
14 is based upon the false factual representation that Plaintiff COLLINS was “dishonorably
15 discharged” from military service directly falsifying the official public records of the United
16 States Navy (See Exhibit “A” hereto, Plaintiff COLLINS’ DD-214).

17 28. In this radio advertisement, Defendant WATERS specifically says that “Joe
18 Collins had his health care paid for serving in the Navy.” This appears to be an admission that
19 Defendant WATERS knew or should have known that Plaintiff COLLINS was not
20 “dishonorably discharged” because Veterans’ health care benefits are not paid by the Navy when
21 an individual is “dishonorably discharged.” As a member of Congress, Defendant WATERS or
22 someone on her staff or in her campaign should have known that the fact that Plaintiff COLLINS
23 has his health care paid for from his Navy service, is prima facie proof that he was never
24 “dishonorably discharged.”

25 29. In the radio advertisement that is currently being published and republished,
26 Defendant WATERS, in her own voice, twice repeats the false and slanderous statement that
27 Plaintiff COLLINS was dishonorably discharged from the Navy to emphasize this false
28 information in the campaign advertisement. However, Defendant WATERS then immediately
states, after twice repeating the false statement, that this information renders Plaintiff COLLINS

1 as “not fit for office” and falsely arguing that he “does not deserve to be elected to public office”
2 based thereon. The defamatory statement is directly presented by Defendant WATERS in this
3 radio advertisement as attempting to convince or sway voters away from voting for Plaintiff
4 COLLINS, imputing to him general disqualification to hold public office.

5 30. The subject radio advertisement has been heard by the general public, and by the
6 voters in the 43rd Congressional District, and many other persons whose names are not currently
7 known to Plaintiff.

8 31. The words in the radio advertisement were slanderous per se under Civil Code,
9 Section 46, because it was a false and unprivileged publication, orally uttered, and
10 communicated by radio to the voters in this election, which (1) falsely charge Plaintiff with some
11 crime, because “dishonorable discharge” can only be by court martial (which never happened)
12 and court martial can only be for a crime (which does not exist); or (3) that statement in the radio
13 advertisement was intended to directly to injure Plaintiff COLLINS in respect to his candidacy
14 and “fitness” for public office in this election for the 43rd Congressional District, by imputing to
15 him general disqualification which Defendant WATERS herself represents in the radio
16 advertisement as a matter which this specific elected office or other public office peculiarly
17 requires.

18 32. The words uttered were a false statement because Plaintiff COLLINS was
19 discharged from the United States Navy by a general discharge under honorable conditions, and
20 not by “dishonorable discharge.”

21 33. The above-described words were spoken by the defendant with malice and/or fraud
22 Defendant WATERS either knew or should have known that this statement was false, had access
23 to the public records concerning Plaintiff COLLINS’ military service discharge and ignored or
24 refused to verify that statement before publishing the false statement in repeated radio
25 advertisements, and thus an award of exemplary and punitive damages is justified.

26 //

27 //

28 //

1 THIRD CAUSE OF ACTION

2 (For Violation of Statute under Penal Code, Section 115.2 and Civil Code, Section 3344.6

3 As against all Defendants)

4 34. Plaintiff COLLINS refers to and incorporated by reference paragraphs 1 to 10,
5 inclusive, and Paragraphs 13-24, inclusive, and 26-33, inclusive, as though set forth in full at this
6 point.

7 35. Plaintiff alleges that misrepresentation of the public records of the Navy is a
8 criminal violation of Penal Code, Section 115.2 and for which civil redress is available under
9 Civil Code, Section 3344.6.

10 WHEREFORE, Plaintiff prays for relief against Defendants, and each of them, as
11 follows:

12 ON THE FIRST AND SECOND CAUSES OF ACTION

- 13 1. For general damages according to proof.
- 14 2. For special damages according to proof.
- 15 3. For punitive damages.

16 ON THE THIRD CAUSE OF ACTION

17 4. For statutory penalties of two (2) times the cost of each false campaign
18 communication but not to exceed fifty thousand dollars (\$50,000) per false statement
19 under Civil Code, Section 3344.6.

20 ON ALL CAUSES OF ACTION

- 21 5. For costs of suit incurred herein.
- 22 6. For such other and further relief as the court may deem proper.

23 Respectfully Submitted,

24
25 Dated: September 30, 2020

By /s/ Donna Bullock

26 DONNA BULLOCK,
27 Attorney for Plaintiff JOE E. COLLINS III
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EXHIBIT 'A'



CAUTION: NOT TO BE USED FOR IDENTIFICATION PURPOSES THIS IS AN IMPORTANT RECORD. SAFEGUARD IT. ANY ALTERATIONS IN SHADED AREAS RENDER FORM VOID

CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY This Report Contains Information Subject to the Privacy Act of 1974, As Amended.

Form fields including: 1. NAME (Last, First, Middle) COLLINS, JOE EDWARD III; 2. DEPARTMENT, COMPONENT AND BRANCH NAVY - USN; 3. SOCIAL SECURITY NUMBER; 4a. GRADE, RATE OR RANK AD; 4b. PAY GRADE E6; 5. DATE OF BIRTH 19851120; 6. RESERVE OBLIGATION TERMINATION DATE NA; 7a. PLACE OF ENTRY INTO ACTIVE DUTY DALLAS MEPS; 7b. HOME OF RECORD AT TIME OF ENTRY; 8a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND HSM 49; 8b. STATION WHERE SEPARATED PSD NORTH ISLAND, CA; 9. COMMAND TO WHICH TRANSFERRED NA; 10. SGLI COVERAGE NONE; 11. PRIMARY SPECIALTY NEC 8841 - F/A-18E/F SYSTEMS ORGANIZATIONAL INITIAL MAINTENANCE TECHNICIAN (12YRS,8MOS); 12. RECORD OF SERVICE table with columns YEAR(S), MONTH(S), DAY(S); 13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED; 14. MILITARY EDUCATION; 15a. COMMISSIONED THROUGH SERVICE ACADEMY; 16. DAYS ACCRUED LEAVE PAID 23.0; 17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION; 18. REMARKS; 19a. MAILING ADDRESS AFTER SEPARATION; 19b. NEAREST RELATIVE; 20. MEMBER REQUESTS COPY 5 BE SENT TO; 21a. MEMBER SIGNATURE; 21b. DATE; 22a. OFFICIAL AUTHORIZED TO SIGN; 22b. DATE.

SPECIAL ADDITIONAL INFORMATION (Use by authorized agencies only) 23. TYPE OF SEPARATION DISCHARGED; 24. CHARACTER OF SERVICE UNDER HONORABLE CONDITIONS (GENERAL); 25. SEPARATION AUTHORITY MILPERSMAN 1010-142; 26. SEPARATION CODE JKO; 27. REENTRY CODE RE-4; 28. NARRATIVE REASON FOR SEPARATION MISCONDUCT (SERIOUS OFFENSE); 29. MEMBER REQUESTS COPY 4

Joe Collins

AUG 30 AT 5:14 PM '09

PREVIOUS EDITION IS OBSOLETE.

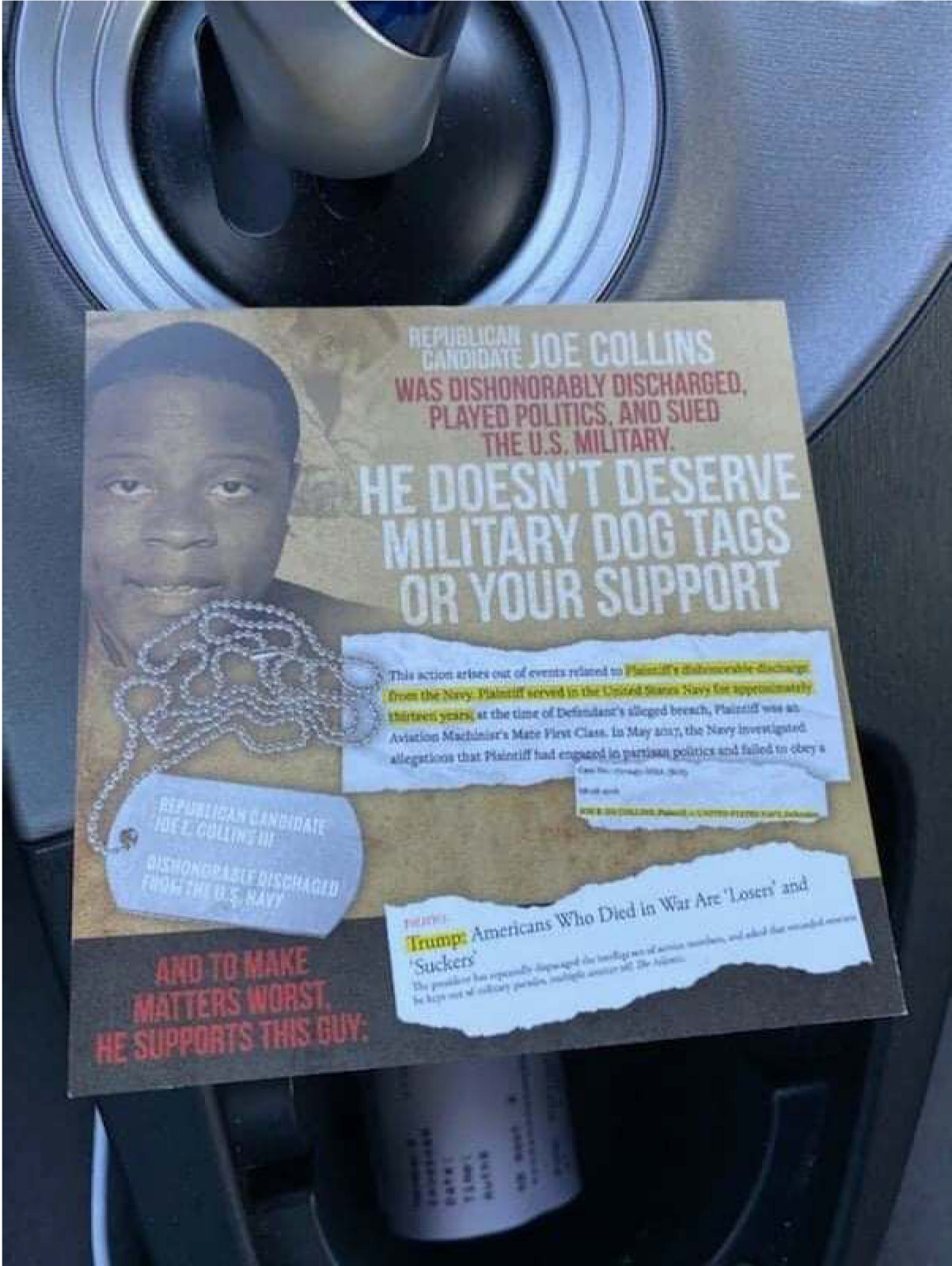
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101 Comments

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EXHIBIT 'B'



REPUBLICAN CANDIDATE **JOE COLLINS**
WAS DISHONORABLY DISCHARGED,
PLAYED POLITICS, AND SUED
THE U.S. MILITARY.

HE DOESN'T DESERVE MILITARY DOG TAGS OR YOUR SUPPORT



This action arises out of events related to Plaintiff's dishonorable discharge from the Navy. Plaintiff served in the United States Navy for approximately thirteen years, at the time of Defendant's alleged breach, Plaintiff was an Aviation Machinist's Mate First Class. In May 2017, the Navy investigated allegations that Plaintiff had engaged in partisan politics and failed to obey a

Case No. 17-cv-00184-UNA-UNA

March 2018

JOE E. COLLINS, Plaintiff, v. UNITED STATES NAVY, Defendant

REPUBLICAN CANDIDATE
JOE E. COLLINS III

DISHONORABLY DISCHARGED
FROM THE U.S. NAVY

TRUMP:

Trump: Americans Who Died in War Are 'Losers' and 'Suckers'

The president has repeatedly disparaged the intelligence of service members, and asked that wounded veterans be kept out of military parades, including across all 50 states.

**AND TO MAKE
MATTERS WORST,
HE SUPPORTS THIS GUY:**

CONGRESSWOMAN

MAXINE WATERS

FIGHTS FOR ALL OF US

Even in the midst of a global healthcare crisis, rise in homelessness, and an attack against the Heroes Act, Congresswoman Waters has continued to fight in Washington to make sure our veterans aren't left behind.

"Veterans deserve the best this country has to offer, I'll never stop fighting on their behalf."

- Congresswoman Maxine Waters

- U.S. House adopts Waters amendment increasing funding for Veterans' Services - **adding an additional \$2 Million.**



Maxine Waters @RepMaxineWaters - Nov 11, 2019

A shoutout to all of our veterans! You are constantly on my radar. My bill, Protect Our Veterans Benefits Act, would ensure veterans' disability benefits can never be taken away! You deserve full support from all elected officials. Thank you for your service to our country!

341

886

4.4K



KEEP OUR CONGRESSWOMAN FIGHTING BY VOTING ON

NOVEMBER 3RD

JOIN THE MOVEMENT AT

MaxineWatersForCongress.com

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AND FOR BY CITING FOR WATERS, P.C. © 2019 WATERS | 360 S. DODD BLVD. SUITE 800 LONG BEACH, CA 90802

Invoice #
Invoice
Date:
Time:
RUTH
US POST &
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