

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
(NASHVILLE DIVISION)**

**BRIAN HARPOLE,**

**JURY DEMAND**

Plaintiff,

v.

**CANDACE OWENS,  
CANDACE OWENS LLC,  
GEORGETOM, INC., &  
MITCHELL SNOW**

Defendants.

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**COMPLAINT**

Plaintiff Brian Harpole hereby sues Defendants Candace Owens, Candace Owens LLC, GeorgeTom, Inc., and Mitchell Snow for defamation and conspiracy to defame.

*Introduction*

1. Candace Owens – a wealthy, influential, and well-known conspiracy theorist with a massive social media following – falsely accused Brian Harpole of conspiring to assassinate Charlie Kirk. She did so in coordination with Mitchell Snow, who fed Owens a completely and obviously fabricated story that Brian Harpole met with Army intelligence officers and Erika Kirk, Charlie’s now widow, at Fort Huachuca to plan the murder. Unsurprisingly, this lawsuit follows.

### *Jurisdiction & Venue*

2. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) because there is complete diversity of citizenship between the Parties, and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

3. Venue is proper in this Court under 28 U.S.C. § 1391(b)(1) and (c)(2) because Defendants Owens, Candace Owens, LLC and GeorgeTom, Inc. reside in this judicial district and this is where the defamation occurred. Venue is also proper under 28 U.S.C. § 1391(b)(2) because “a substantial part of the events or omissions giving rise to the claim” occurred within this judicial district.

### *Parties*

4. Plaintiff Brian Harpole is a citizen and resident of Texas. He is the founder and head of Integrity Security Solutions, a private security firm. In or around 2018, Harpole began working for the late Charlie Kirk, with Integrity Solutions providing security for Turning Point USA and protective services for Kirk from 2022 to 2025. Integrity Solutions provided these services for Turning Point USA and Charlie Kirk at Utah Valley University on September 10, 2025, where Kirk was fatally shot. Harpole seeks damages in excess of \$75,000.00 on his behalf and on behalf of his closely held company, Integrity Solutions.

5. Defendant Candace Owens is a citizen and resident of Williamson County, Tennessee. She is a public commentator, podcaster, and social media influencer with a

substantial following on platforms including X (formerly Twitter) and YouTube. She is neither a journalist nor a reporter. She publishes content through her podcast and X account @RealCandaceO. Owens is the host of her podcast *Candace*, which is published in video form on platforms such as YouTube (@RealCandaceO), Rumble (rumble.com/c/RealCandaceO), and her website, CandaceOwens.com. *Candace* is also available in an audio only format on Apple Podcasts, Spotify, and other platforms where podcasts are available. This Court has personal jurisdiction over Owens because she is domiciled in Tennessee.

6. Defendant Candace Owens LLC is a Delaware limited liability company with its principal place of business in Tennessee. Owens is the sole member and manager of Candace Owens LLC and resides in Williamson County, Tennessee. She has exclusive control over the LLC. Candace Owens LLC manages Owens's social media accounts and controls all content that is posted to Owens's social media accounts, including X, Facebook, and Instagram. Owens disseminated her false and defamatory statements through Candace Owens LLC. Candace Owens LLC is liable to the same extent as Candace Owens because it publishes her content. This Court has personal jurisdiction over the LLC because its sole member is a citizen of Tennessee. Candace Owens LLC owns, operates, and controls the @RealCandaceO X account which published several defamatory posts about Harpole.

7. Defendant GeorgeTom, Inc. is a Delaware corporation with its principal place of business in Tennessee. Owens made false and defamatory statements on her podcast, *Candace* which, in addition to publishing on YouTube, she also published to her website, CandaceOwens.com, which is operated by GeorgeTom, Inc. Owens oversees and directs all content that GeorgeTom, Inc., publishes on CandaceOwens.com. Owens is the sole or majority shareholder of GeorgeTom, Inc., and has primary control over the management of GeorgeTom, Inc. Whereas Candace Owens LLC handles Owens's social media, GeorgeTom, Inc. manages podcast production, website content, and related media operations. GeorgeTom, Inc. is liable to the same extent as Candace Owens because it publishes her content. This Court has jurisdiction over GeorgeTom, Inc. because its principal place of business is located in Tennessee. GeorgeTom, Inc. owns, operates, and controls candaceowens.com, Owens's website which hosts the episodes of her podcast which contain defamatory statements regarding Harpole.

8. Defendant Mitchell Snow is a resident of Washington State. The Court has personal jurisdiction over him because he purposefully availed himself of the laws of Tennessee on at least three separate occasions: (1) on December 8, 2025, Snow spoke with Owens, a Tennessee resident, fed her a false story that Harpole was involved in a top secret meeting with high-ranking military officials involving a plot to assassinate Charlie Kirk, and authorized Owens to tell his false story on her podcast, which is filmed and recorded in Tennessee; (2) at some point after December 9, 2025, but before December 18,

2025, Snow and Owens communicated a second time for the purpose of scheduling and coordinating Snow's December 18, 2025, appearance on Owens's Tennessee-based podcast; and (3) on December 18, 2025, Snow appeared Owens's Tennessee-based podcast. As a direct result of his appearance on Owens's podcast, Snow caused Harpole reputational and other injury in Tennessee. Moreover, exercising jurisdiction over Snow does not offend traditional notions of fair and play and substantial justice because he could have and reasonably should have foreseen being hauled into a Tennessee federal court after he communicated with Owens, a Tennessee resident, and appeared on her Tennessee-based podcast for the sole purpose of spreading a fabricated story regarding Harpole.

9. Alternatively, even if Snow's direct, individual contacts with Tennessee are deemed insufficient on their own, this Court possesses personal jurisdiction over Snow under a theory of specific personal jurisdiction based on conspiracy liability. Tennessee law recognizes that, "an out-of-state defendant involved in a conspiracy who lacks sufficient 'minimum contacts' may nevertheless be subject to jurisdiction because of a co-conspirator's contacts with the forum." *Chenault v. Walker*, 36 S.W.3d 45, 47 (Tenn. 2001). Under this doctrine, the in-state acts of a co-conspirator are imputed to the out-of-state defendant, thereby satisfying the constitutional requirements of minimum contacts. As further alleged herein, Snow entered into a conspiracy with Owens for the express purpose of engaging in a coordinated and deliberate campaign designed to defame

Harpole and ruin his reputation. Owens and Snow agreed that Owens would use her network — including her podcast, website, and social media accounts (all of which are controlled by either Candace Owens LLC or GeorgeTom Inc.) — to promote and publish Snow’s fallacious narrative that Harpole was involved in a plan with the United States to have Kirk assassinated. Crucially, Snow knew, or had reason to know, that substantial acts in furtherance of the agreed-upon conspiracy would occur in Tennessee as Owens is a Tennessee resident, her podcast is recorded and broadcast from Tennessee, and her website and social media accounts are operated from entities whose principal places of business are in Tennessee. Furthermore, Owens’s acts in furtherance of the conspiracy — specifically, recording and publishing defamatory remarks from Tennessee — are tortious acts. These acts are a type, which, if committed directly by Snow as a non-resident, would independently subject him to personal jurisdiction under Tennessee’s long-arm statute. Because Snow conspired with Owens, who he knew to be a resident of Tennessee, to utilize a Tennessee-based media apparatus to effectuate a defamatory campaign, the State of Tennessee has a substantial connection to the conspiracy. Accordingly, Owens’s acts are properly imputed to Snow, and this Court has personal jurisdiction over Snow.

### *Facts*

#### *Candace Owens’s Backstory*

10. Candace Owens is an entertainer. In recent years, her brand has been to use her sizable social media platform to spread salacious and mostly baseless stories to her

millions of followers. These platforms are monetized – the more followers she has and the more views her content receives, the more money she makes. She is not subject to any editing or oversight or professional ethics. The accuracy of her statements is irrelevant to her income, *i.e.*, she monetizes the defamation she slings.

11. Throughout her career, Owens has demonstrated a pattern of seeking public attention and media exposure. In an apparent effort to maintain relevance and increase engagement on her platform, Owens repeatedly makes inflammatory and highly controversial statements. For example, Owens has been publicly quoted as stating, “Jewish people were the ones that were trading us [black people]. Jewish people were in control of the slave trade”<sup>1</sup> and that Mengele’s twin experiments were actually “bizarre propaganda.”<sup>2</sup>

12. In 2019, Owens hosted a podcast on PragerU’s YouTube channel where she interviewed conservative figures and provided commentary on current events.

13. From 2021 to 2024, Owens hosted her show *Candace* on The Daily Wire, but in 2024, The Daily Wire terminated its relationship with Owens following months of controversy arising from anti-Semitic remarks she made on the program.

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<sup>1</sup> Candace Owens, *What Does Ben Shapiro Know About Erika Kirk and Fort Huachuca?* | *Candace Ep 283* [26:46], (YouTube, Dec. 19, 2025), [https://www.youtube.com/watch?v=w1oqQbR\\_bYs](https://www.youtube.com/watch?v=w1oqQbR_bYs).

<sup>2</sup> Candace Owens, *Literally Hitler. Why Can’t We Talk About Him?* | *Candace Ep 17* [11:56], (YouTube, July 2, 2024), <https://www.youtube.com/watch?v=qhLXcvxdIyw>.

14. After Owens's departure from The Daily Wire, she started her own independent podcast, *Candace*. The format of *Candace* is similar to her predecessor podcast. A typical episode of *Candace* involves Owens discussing and providing her own thoughts and commentary on current events and other trending topics. Occasionally, Owens's podcast will depart from its normal format, and she will interview a guest.

15. Owens livestreams her podcast every weekday to her almost 6 million YouTube subscribers and approximately 523,000 Rumble followers. Owens posts her podcast in video form to her X (formerly Twitter) account, @RealCandaceO, for her 7.8 million followers. Her podcast can also be found in audio form on other podcast services such as Apple Podcast and Spotify where they are listened to millions more times. Each episode of her podcast is viewed or listened to by tens of millions of people.

16. Her podcast discussions are presented in a manner designed to maximize attention regardless of the verifiable falsity of many of her claims.

17. Owens describes herself as an "investigative journalist," though her work primarily consists of commentary, interviews, and opinion-driven content rather than investigative reporting. Owens is nothing more than an entertainer, and not an "investigative journalist" like she claims.

18. Owens regularly uses her podcast, as well as her X account, to promote and discuss conspiracy theories, often selecting topics that are controversial or trending, to attract views and increase engagement.

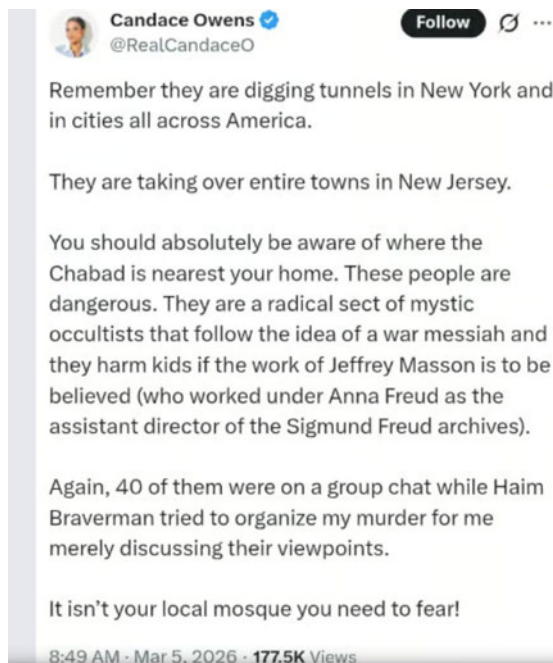
19. For example, Owens has used her podcast and social media accounts to platform baseless and malicious conspiracies such as: (1) Brigitte Macron, the First Lady of France, is secretly transgender;<sup>3</sup> (2) the moon landing was fake;<sup>4</sup> and (3) a slew of antisemitic conspiracy theories including, but not limited to, that Chabad Lubavitch, a sect of Hasidic Jewry, is “dangerous,” responsible for the Iran war, and is building secret tunnels throughout the United States, and that Israeli Prime Minister Bibi Netanyahu was responsible for the attacks of September 11, 2011, as well as general Holocaust denial in the form of downplaying and questioning the extent of the Third Reich’s eradication of the Jewish people. This is only a small sample of the erroneous and malicious rhetoric Owens advances.<sup>5</sup> She also expands her reach by retweeting other conspiracy theorists and those who otherwise monetize hate and malice.

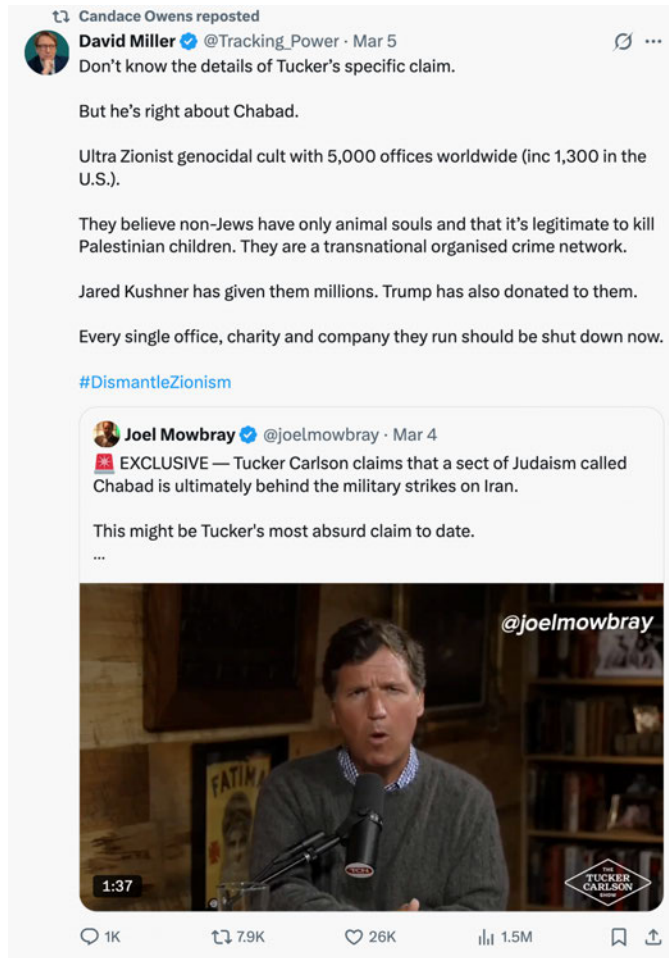
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<sup>3</sup> Candace Owens, *So...Is Brigitte Macron A Man?*, (YouTube, Jun. 17, 2024), <https://www.youtube.com/watch?v=N62cHLtceqs>.

<sup>4</sup> Candace Owens, *How We Faked The Moon Landing With Bart Sibrel* | *Candace Ep 124*, (YouTube, Dec. 19, 2024), <https://www.youtube.com/watch?v=PlIP0o41rqE>.

<sup>5</sup> See, e.g., Candace Owens, *Literally Hitler. Why Can't We Talk About Him?* | *Candace Ep 17*, (YouTube, July 2, 2024), <https://www.youtube.com/watch?v=qhLXcvxdIyw>.





*Owens Targets Harpole*

20. On September 10, 2025, Charlie Kirk was assassinated while speaking at Utah Valley University in Orem, Utah (“UVU”). Law enforcement identified Tyler Robinson as the assassin, and he is currently facing capital murder charges. To this day, neither law enforcement nor any other serious person has suggested that Robinson acted on behalf of or in connection with any other person or entity.

21. On the day of the assassination, Harpole and his company Integrity Solutions were responsible for providing security for Charlie Kirk. Neither Harpole nor

his company Integrity Security Solutions had foreknowledge of, were involved in, acted negligently with respect to, or participated in any cover-up of the assassination.

22. The lack of evidence indicating foul play did not stop commentators from crafting their own conspiracy theories surrounding the assassination. Commonly spread theories included: (1) the existence of a second shooter who utilized a trapdoor and tunnel system to gain access to Kirk's speaking engagement; (2) Kirk was killed by a small explosive device instead of a bullet; (3) UVU's quick deconstruction of the crime scene was done to cover-up a larger conspiracy; and (4) the United States government intended to assassinate Kirk, with Harpole involved in the alleged scheme. Owens is the most high-profile spreader of baseless Charlie Kirk conspiracy theories, but she is not the only one. Her actions have encouraged and emboldened and otherwise given cover to other people to jump on the Charlie Kirk conspiracy bandwagon.



**Blake** @BlakeBednarz · 3d  
Replying to @TPUSA and @KidRock

His name is BRIAN HARPOLE



18 48 549 6.3K



**Blake** @BlakeBednarz · 10h

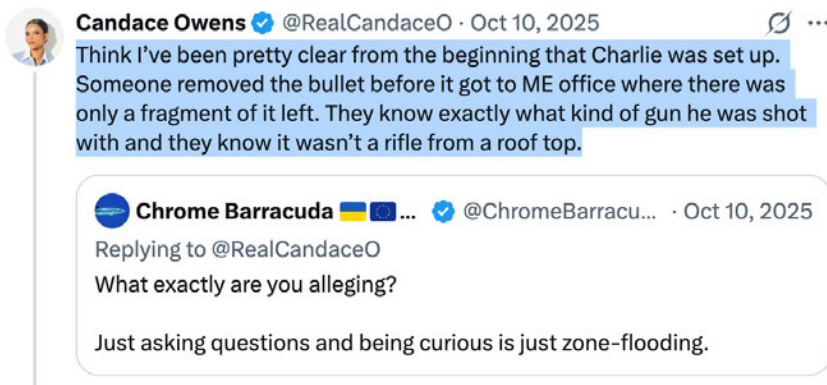
Watch the guy in the Blue shirt (Brian Harpole). \*Now, cross your own arms & position your own hands EXACTLY like he is doing & \*comment below how natural it feels. For me it's NOT natural at all! (His right hand is gripping the explosive trigger which is concealed under his shirt)



51 61 363 29K

23. Shortly after the assassination, Owens began disseminating content asserting that Kirk was betrayed by individuals close to him, that the government orchestrated a cover-up of the assassination, that Turning Point USA was implicated in the event, and advancing numerous additional conspiracy theories suggesting that somebody other than Tyler Robinson was involved in the murder.

24. For example, on October 10, 2025, Owens posted to X: “Think I’ve been pretty clear from the beginning that Charlie was set up. Someone removed the bullet before it got to ME office where there was only a fragment of it left. They know exactly what kind of gun he was shot with and they know it wasn’t a rifle from a roof top.”



25. As further alleged herein, what began as Owens’s generalized conspiracy theories about the assassination quickly escalated into a sustained campaign to publish and disseminate dozens of social media posts and YouTube videos falsely implicating Harpole in Kirk’s assassination.

26. On her October 27, 2025, podcast episode (“Charlie’s Angels or Demons?”), Owens’s highlighted actions by Kirk’s team members, (e.g., the camera man taking a selfie

video shortly after the shooting and walking away), and questioned how they “kn[ew] Charlie Kirk was dead” before confirmation, implying their insider knowledge or complicity.<sup>6</sup> A few weeks later, Owens said, “in real life, when you spend millions of dollars on security, on your security detail, they don't have you sitting like a sitting duck and forget to have an ambulance behind you.”<sup>7</sup>

27. Owens has likewise labeled the post-shooting behavior of Kirk's security team as “shady.” She remarked: “[T]hey then put down pavers almost immediately and re-leveled that area ... I do find that to be quite shady; I don't know what they were doing.”<sup>8</sup>

28. On November 17, 2025, after Owens and other conspiracy theorists had already implicated Harpole and his team in the assassination, Harpole appeared on the Shawn Ryan Show solely to respond to and rebut the defamatory statements. On or about November 25, 2025, Harpole was interviewed by Gary Milton with Paramount Tactical for the purpose of rebutting more defamatory statements. As of the date of this

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<sup>6</sup> Candace Owens, *Charlie's Angels or Demons? Disturbing Footage Emerges* | Candace Ep 252, [26:25], (YouTube, Oct. 27, 2025), <https://www.youtube.com/watch?v=c5BcKF91iec>.

<sup>7</sup> Candace Owens, *Why Is Everyone Crashing Out Over The Charlie Kirk Investigation?* | Candace Ep 262 [36:05], (YouTube, Nov. 10, 2025), [https://www.youtube.com/watch?v=YaZfwLQ7vrI&list=PLPW2eH9z9CUt\\_PUXytKzBf9ZJQKMVIjOI&index=28](https://www.youtube.com/watch?v=YaZfwLQ7vrI&list=PLPW2eH9z9CUt_PUXytKzBf9ZJQKMVIjOI&index=28).

<sup>8</sup> Candace Owens, *What Did Charlie Kirk Discover Near The End?* | Candace Ep 264, [56:40], (YouTube, Nov. 13, 2025), [https://www.youtube.com/watch?v=yAlb-NuUh\\_U&list=PLPW2eH9z9CUt\\_PUXytKzBf9ZJQKMVIjOI&index=30](https://www.youtube.com/watch?v=yAlb-NuUh_U&list=PLPW2eH9z9CUt_PUXytKzBf9ZJQKMVIjOI&index=30).

Complaint, the two podcast appearances remain isolated responses undertaken by him to defend his reputation in response to defamatory statements made by others.

29. Despite his two podcast appearances, Harpole remains a private individual and not a limited-purpose public figure. He has social media accounts that he does not use for posting content. He has no public platforms to effectively rebut or counteract statements, and his involvement in the controversy is limited to two defensive appearances. He did not seek publicity or attempt to influence public debate, and his participation in the controversy was limited to defending himself against statements directed at him. Two podcast appearances to respond to allegations does not meet Tennessee's standard for limited-purpose public figure status. *See, e.g., Charles v. McQueen*, 693 S.W.3d 262 (Tenn. 2024); *Trigg v. The Elk Valley Times*, 720 S.W.2d 69 (1986). Should the Defendants claim Harpole is a public figure or a public figure for a limited purpose, Harpole expressly preserves his right to allege and prove actual malice.

30. Harpole's attempt to rebut Owens's defamatory statements soon proved fruitless as the very next day, Owens stated on her podcast that Harpole should be fired due to his purported failure to ensure adequate perimeter security during Kirk's speech. She additionally claimed that after the shooting, Harpole ran over to Kirk with his small

“supposed to be” medical bag, and that he lied about drone availability, with Owens asking, “[i]s this how these assassinations happen?”<sup>9</sup>

31. Later in the episode, Owens explained that prior to the event on September 9, 2025, Harpole corresponded with a “Chief Long” about securing rooftop access. She then accused Harpole of criminal negligence, asserting that he did not follow up with “Chief Long” about securing the roof. She then stated: “[Harpole] should have followed up because it’s your job and Charlie paid you millions of dollars to not pass the buck...Also, you ask the police chief an ‘either or’ question...And he said he got you covered, what does that mean?. . . . No follow up? ... That’s what Charlie was paying for?...That’s obviously absurd. That’s not an answer that should be accepted by anyone.... On the basis of that answer, you [Harpole and his team] should all be fired.” Owens would repeat multiple times throughout the episode that Harpole should be fired because of his alleged failure to protect Kirk on September 10, 2025.<sup>10</sup> This is false, as all communications with Chief Long were handled by Dan Flood; Harpole was not involved.

32. The following day, on Owens’s November 19, 2025, podcast episode (“Charlie Kirk and the Crossing of the Delaware”) she repeated her accusations that

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<sup>9</sup> Candace Owens, *The Great Exodus From Utah? Where Did The “Egyptians” Go On 9/10?* | Candace Ep 267 [24:42], (YouTube, Nov. 18, 2025), [https://www.youtube.com/watch?v=581dILVcEE4&list=PLPW2eH9z9CUt\\_PUXytKzBf9ZJQKMVijOI&index=33](https://www.youtube.com/watch?v=581dILVcEE4&list=PLPW2eH9z9CUt_PUXytKzBf9ZJQKMVijOI&index=33).

<sup>10</sup> *Id.*

Harpole and his team misrepresented the availability of drones, claiming he was “not convincing at all” during his appearance on the Shawn Ryan podcast and alleging that the federal government is using him to spread falsehoods, including the claim that Kirk was shot with a different, smaller-caliber weapon.<sup>11</sup>

33. Like before, Owens did not produce evidence that Harpole acted negligently in the lead-up to Kirk’s assassination or that he was dishonest in his interview with Shawn Ryan.

34. Up to this point, Owens’s attacks were primarily confined to Harpole’s alleged job failures. But beginning with the December 9, 2025, episode of her podcast, Owens began accusing Harpole of direct involvement in the assassination.

35. On Owens’s December 9, 2025, podcast episode, (“Charlie Kirk’s Last Trip to Asia...”), Owens opened by teasing that she had uncovered new evidence regarding Kirk’s assassination: “Well, what I’m about to tell you guys today is going to positively blow your mind. I just cannot see how this would lead to anything other than a full confession from the government about the military’s involvement in [Charlie Kirk’s] assassination but I’m just going to deliver the facts and see where they land.”<sup>12</sup>

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<sup>11</sup> Candace Owens, *Charlie Kirk And The Crossing Of The Delaware* | Candace Ep. 268 [30:56], (YouTube, Nov. 19, 2025), <https://www.youtube.com/watch?v=SKGUzGHymc>.

<sup>12</sup> Candace Owens, *Charlie Kirk’s Last Trip To Asia...* | Candace Ep 277, [0:33], (Dec. 9, 2025), [https://www.youtube.com/watch?v=t4U7NjnUEgc&list=PLPW2eH9z9CUt\\_PUXytKzBf9ZJQKMVijOI&index=43](https://www.youtube.com/watch?v=t4U7NjnUEgc&list=PLPW2eH9z9CUt_PUXytKzBf9ZJQKMVijOI&index=43).

36. In this episode Owens claimed that on December 8, 2025, she received a “credible” tip from a former military member – first referred to by Owens as “Harry Meyers” but later identified as Defendant Mitch Snow – claiming that he inadvertently entered a classified meeting at Fort Huachuca on September 9, 2025, the day before Charlie Kirk’s assassination, observed senior government officers in attendance, and that following the assassination, identified Harpole as one of the individuals present for the meeting. (It is unclear how someone can “inadvertently” enter a classified meeting at a U.S. Army base where the government was secretly plotting to kill a prominent political activist, but Snow claims to have pulled it off.). Upon information and belief, it was during this December 8, 2025, conversations that Owens and Snow agreed to enter into a conspiracy to defame Harpole by using Owens’s network, including her podcast, social media accounts, and websites, to spread this maliciously false theory.

37. Although Owens asserted that she had “fact-checked” Snow’s account and that the facts are “one-hundred percent honest,” she provided no explanation of how this was done or what indicia of credibility supported her conclusion.<sup>13</sup> The purpose of these statements was to assert by implication that there was a government conspiracy to assassinate Kirk and that Harpole was a part of this conspiracy.

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<sup>13</sup>*Id.* at 3:50.

38. According to Snow, as relayed and published by Owens, there were about “twelve lieutenant colonels” participating in a “pretty important meeting,” at Fort Huachuca on September 9, 2025. The meeting was described as the type that is typically held “ahead of an operation.” Owens reported that Snow told her: “When an operation is being confirmed, you have these final meetings, and they involve all the higher-ups and you are trying to do this in a very isolated location where you know people are not going to accidentally happen upon you[.]”<sup>14</sup>

39. Owens then reported that Snow told her that he is confident he saw Harpole walking out of the meeting with the military officials, reiterating that she believed Snow and his story were “very credible.” Again, she did not explain why she believed the story to be credible.

40. Importantly, the description of the episode reads: “After today, I do not know how this leads to anything other than a full confession from the government about their [sic] involvement in Charlie Kirk’s assassination.” The description, read within the context of the content of the episode, clearly sends the message that Snow witnessed Harpole leaving a meeting where he was conspiring with the military and/or federal government to have Charlie Kirk assassinated.

41. Owens advertised this episode on X writing, “Today on the show: I received SHOCKING information which puts Charlie’s last trip to Asia in a new light. And it

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<sup>14</sup>*Id.* at 25:49.

involves his security detail, Brian Harpole. This will shock your senses but I feel this information must be presented. Join us LIVE,” and then linked the episode.



42. The claim that Harpole was present at Fort Huachuca on September 9, 2025, for an alleged meeting is verifiably false—as Harpole’s travel records plainly place him in Dallas, Texas. There would also be records showing Harpole’s access to the base. Owens had access to these records, but dismissed them without any investigation, claiming they did not provide an alibi for when the meeting concluded. To avoid any uncertainty, Brian Harpole has never been to Fort Huachuca. Not ever. Additionally, there is no evidence that such a meeting even took place, with or without Harpole.

43. Despite the verifiable falsity of her statements, Owens’s viewers and supporters understood, via responses, that she was claiming that Harpole conspired with the Trump Administration to assassinate Charlie Kirk:



**Oliver Janich** @OliverJanich · Dec 9, 2025



Let's not forget that Brian Harpole is the guy who did not secure the staircase to the roof and told us that Dan Flood did not make any hand signs although he clearly did. The vry same guy who allegedly got the text message from Charlie, that they are going to kill him. If Harpole would have had a good explanation what these hand signals mean, then it would not be suspicious, But denying it, is. [x.com/make\\_metal/sta...](https://x.com/make_metal/sta...)  
[x.com/JohnMcCloy/sta...](https://x.com/JohnMcCloy/sta...)  
[x.com/Squigglybitch1...](https://x.com/Squigglybitch1...)



18

1K



**Ali from Cali** @AliRoland · Dec 9, 2025



Brian Harpole made a mistake advising they did not use call signs 9/10. Even Shawn Ryan who I don't fully trust was taken aback because he assumed what he was looking at were active call signs....lol and Shawn is the expert.



11

632



**Jennifer Freedom** @JenEllen773 · Dec 9, 2025



Charlie's camp was full of bad actors. I find it hard to believe he kept company with these fools. And that he paid top dollar for his security detail!



10

689



Repost



**Louise Trump** @Louisetump · Dec 9, 2025



Why was Brian Harpole leaving a military operation meeting days before Charlie assassination? This is absolutely wild and it needs answers.



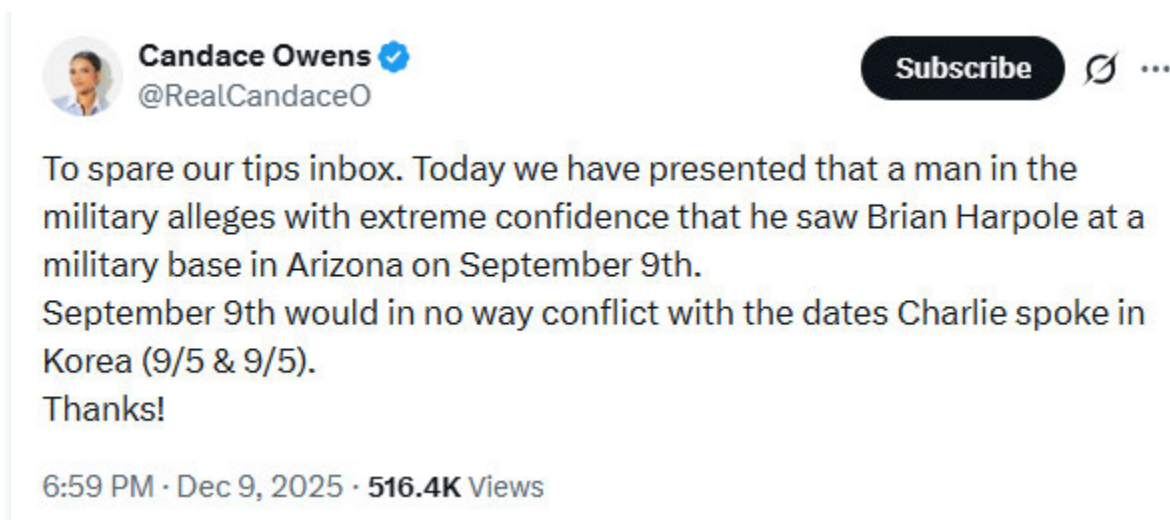
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44. Following the December 9, 2025, episode of her show, Owens made the following X post:



45. On December 12, 2025, Owens posted to X that "Brian Harpole has already been caught lying about what transpired on that day. Did he also lie about having placed a 911 call? Did no one from their team call 911 after Charlie was shot?" In reality, Harpole did not lie about the events of the day, placing a 911 call, or anything else.



**Candace Owens** @RealCandaceO · Dec 12, 2025



This is a perfect example of a public question that Turning Point can easily answer.

Brian Harpole has already been caught lying about what transpired on that day.

Did he also lie about having placed a 911 call? Did no one from their team call 911 after Charlie was shot?



**Sam Parker** @BasedSamParker · Dec 12, 2025

**CHARLIE KIRK & THE MYSTERIOUS MISSING 911 CALL**

Brian Harpole claims they called 911 on the way to the hospital. But, when they arrived, he says the hospital didn't know they were coming.

I GRAMA requested all the 911 calls from September 10th & Utah sent ...

**ALL TWENTY 911 CALLS RELEASED UNDER GRAMA REQUEST**

|              |                |
|--------------|----------------|
| 12:24:26-911 | 12:31:37-911   |
| 12:24:32-911 | 12:31:56-911   |
| 12:24:35-911 | 12:35:20-911   |
| 12:26:09-911 | 12:35:29-911   |
| 12:26:17-911 | 12:35:53-PD/FD |
| 12:27:17-911 | 12:37:40-PD/FD |
| 12:29:43-911 | 12:39:05-911   |
| 12:30:00-911 | 12:45:08-911   |
| 12:30:14-911 | 12:46:23-911   |
| 12:31:32-911 | 12:57:06-911   |

**18 CALLS WENT TO CENTRAL UTAH 911 DISPATCH, 2 WERE ROUTED TO OREM POLICE & FIRE DISPATCH**

8:28

@BasedSamParker @SamParkerSenate

1K

2.2K

12K

912K



46. Despite accusing Harpole of lying, Owens failed to specify any statements by Harpole that were allegedly false and presented no evidence to support her conclusion that Harpole lied about the events of September 10, 2025.

47. On December 16, 2025, Owens retweeted an X post which asked, “who is Brian Harpole?” Responding to the question of “who is Brian Harpole,” Owens responded that Harpole was “Charlie Kirk’s security officer that didn’t do so much as pack his wound after he was shot.” The implication here is that Harpole intentionally let Kirk bleed out and die from his gunshot wound instead of rendering aid.

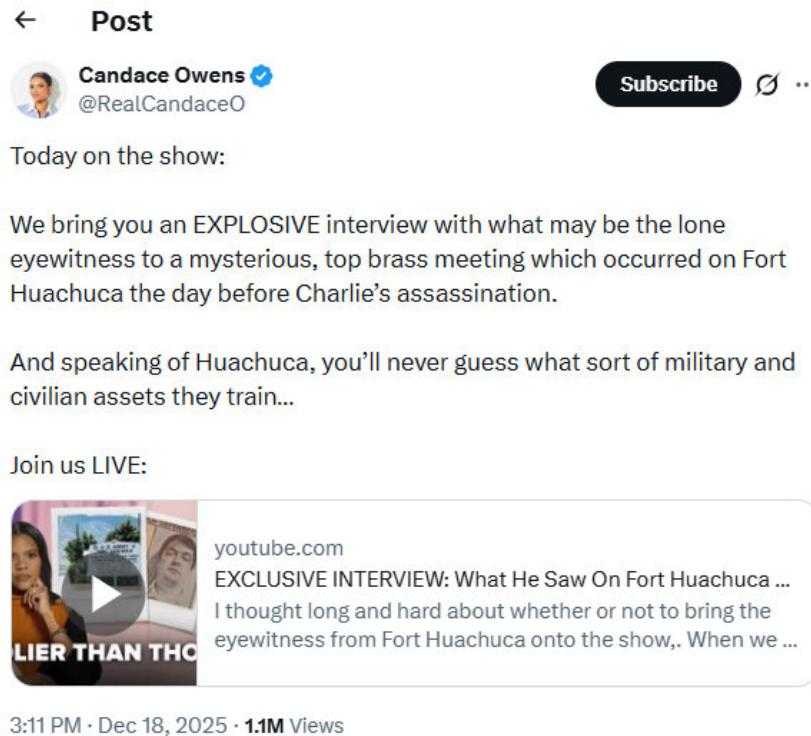


48. On Owens’s December 16, 2025, podcast episode (“Erika And I Sat Down. Here’s What Happened”), Owens brazenly stated that she had not received a cease-and-desist letter from Kirk’s security team and that the team has no basis to sue her: “I mean the audacity that you’re filing a lawsuit and someone got murdered on your watch.” Upon information and belief, Defendant made the foregoing statement with the intent to provoke or challenge Plaintiff into taking legal action against her.<sup>15</sup>

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<sup>15</sup> Candace Owens, *Erika And I Sat Down. Here’s What Happened.* | Candace Ep 280, [47:34] (YouTube, Dec. 16, 2025), [https://www.youtube.com/watch?v=es7PWdFGoFI&list=PLPW2eH9z9CUt\\_PUXytKzBf9ZJQKMVIjOI&index=46](https://www.youtube.com/watch?v=es7PWdFGoFI&list=PLPW2eH9z9CUt_PUXytKzBf9ZJQKMVIjOI&index=46).

49. On December 18, 2025, Owens, using X to advertise her upcoming podcast episode, wrote “We bring you an EXPLOSIVE interview with what may be the lone eyewitness to a mysterious, top brass meeting which occurred on Fort Huachuca the day before Charlie’s assassination....”



50. The “lone eyewitness” Owens was referring to was Mitch Snow (whom she had referred to as “Harry Meyers” in the December 9, 2025 episode of the podcast). The interview aired on the December 18, 2025 episode of Defendant’s podcast, (“EXCLUSIVE INTERVIEW: What he Saw on Fort Huachuca the Day Before Charlie Died”). Much of

the interview reiterated, and republished, the same story that Owens previously told on the December 9, 2025 episode of her podcast.<sup>16</sup>

51. Notably, during the December 18, 2025, interview, Snow stated that he saw a congressman walking out of Fort Huachuca with several people, including multiple “high-ranking” military officials. Later, Snow stated, “the head of security there [Brian Harpole] he was one of the people walking out with the Congressman.” According to Snow, he claimed he knew it was Harpole because he has “a gift for recognizing people.” Snow said he saw “someone with the same mannerisms, same crick in his neck, face, waxy look on his face, hand gestures, uh, shoulder shrug, gait, approximate height, [and] haircut” as Brian Harpole “definitely walked past me.”

52. Owens then asked Snow how certain he was that he saw Harpole at the Fort Huachuca meeting. Snow responded that he was “95 to 99” percent certain that he saw Harpole leaving the “high ranking” military meeting the morning of September 9, 2025.<sup>17</sup> Owens expressly adopted and endorsed Snow’s statements, affirming their purported truth and representing that she would assist him by fundraising and supporting his efforts to pursue and publicize these fallacious claims. Owens explicitly agreed with Snow, stating his “instincts [were] right” that he walked in on the end of an important

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<sup>16</sup> Candace Owens, *EXCLUSIVE INTERVIEW: What He Saw On Fort Huachuca The Day Before Charlie Died.* | Candace Ep 282, (YouTube, Dec. 18, 2025), [https://www.youtube.com/watch?v=ewBzjVe3LNO&list=PLPW2eH9z9CUt\\_PUXytKzBf9ZJQKMVIjOI&index=48](https://www.youtube.com/watch?v=ewBzjVe3LNO&list=PLPW2eH9z9CUt_PUXytKzBf9ZJQKMVIjOI&index=48).

<sup>17</sup>*Id.* at 56:57.

meeting. During the episode, Owens claimed to have evidence confirming that Snow witnessed the end of this meeting but has since failed to produce said evidence because it does not exist.

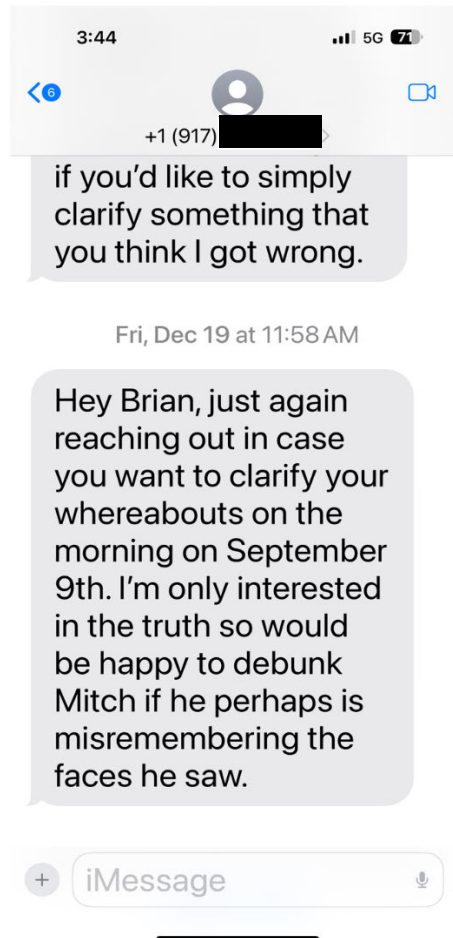
53. These statements are verifiably false. Harpole was in Dallas, Texas the morning of September 9, 2025, and therefore could not have possibly attended a meeting in Arizona. Owens had access to Harpole's flight records and knew it was impossible for Harpole to have been at Fort Huachuca on September 9, 2025.

54. On December 17, 2025, apparently fearing a lawsuit, Owens reached out to Harpole, asking if he wanted to "have an off the record discussion." Harpole did not respond.



55. Owens then used Harpole’s silence to further defame him. On the December 19, 2025, episode of her podcast (“What Does Ben Shapiro Know About Erika Kirk and Fort Huachuca?”), Owens implied Harpole’s failure to respond to her text message as suspicious. In the same podcast, Owens again placed Harpole at Fort Huachuca, characterizing the alleged meeting as a form of planning or coordination related to the assassination of Kirk. She stated that she found Snow’s narrative to be “compelling” because she had been “given travel logs for Brian Harpole and it is entirely possible that Brian Harpole could have made it for that meeting. I can tell you that

definitively. Brian Harpole could have made it to that base for that early morning meeting.”<sup>18</sup> This is blatantly false.



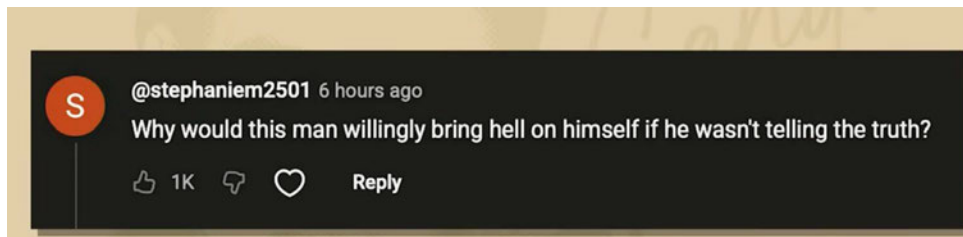
56. To this day, Owens has still not produced the alleged “travel logs” she referred to in this episode to give false credibility to the defamatory assertion she was promoting that Harpole had been part of an assassination conspiracy meeting at Fort

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<sup>18</sup> Candace Owens, *What Does Ben Shapiro Know About Erika Kirk And Fort Huachuca?* | *Candace Ep 283* [37:35], (YouTube, Dec. 19, 2025), [https://www.youtube.com/watch?v=w1oqQbR\\_bYs](https://www.youtube.com/watch?v=w1oqQbR_bYs).

Huachuca. She has never produced them because she knows that they demonstrate that Harpole was in Dallas, Texas at the time of the Fort Huachuca meeting.

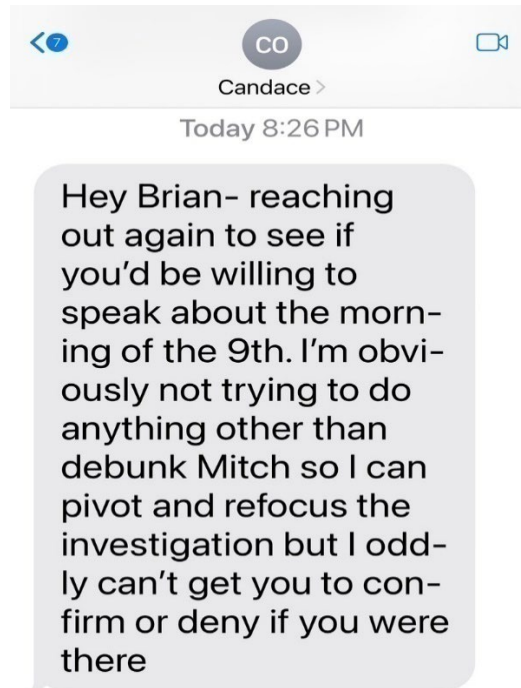
57. At the end of her video, she reads some of the comments her viewers left on recent videos. Owens specifically brought attention to and boosted one comment which expressed support for Snow and his false story:







58. Comments like the one above demonstrate that Owens's followers understood her episodes to mean that Snow really had seen Harpole at Fort Huachuca on September 9, 2025, leaving the alleged "top brass" meeting.

59. Owens soon texted Harpole a third time, asking him again if he would like to speak about the events that transpired on the morning of September 9, 2025. Owens concluded her text message by stating that she found it "odd" she could not get Harpole "to confirm or deny" his location on the morning of September 9th. Owens already knew why Harpole did not respond. Her repeated texts to Harpole to get him to respond to the defamatory conspiracy theories that she had been promoting present a cynical attempt to profit from a situation she had manufactured. By spreading defamatory lies about Harpole and then cajoling him to give her the "exclusive content" of a response, she

stood to profit from increased attention and viewership to her platform at Harpole's expense.



60. On December 22, 2025, Owens confirmed on X that she had viewed Harpole's flight records and she incorrectly stated that they do not provide an alibi for him at 7:30am—which is when the alleged meeting concluded at Fort Huachuca.

**Candace Owens**  [@RealCandaceO](#)   

Alex is just revealing himself. I already had Brian Harpole's flights and confirmed to my audience that they DO NOT provide an alibi for 7:30am —which is when the meeting CONCLUDED at Fort Huachuca.

I also texted Brian Harpole and offered him a chance to give me any response, before our latest episode. I was looking to simply debunk that it was him because I am open to the possibility that it may have just been a lookalike.

But everyone out here panicking and Amodעי fumbling his schedule is definitely making things more interesting...



61. Owens’s post confirms that by the time she had recorded and published her podcast episodes, she had already viewed Harpole’s flight records. Accordingly, she knew that it was physically impossible for Harpole to have attended the alleged meeting on September 9, 2025. She nonetheless published the false and defamatory remarks accusing Harpole of attending the alleged meeting.

62. Owens’s campaign of misinformation should have ended as soon as she admitted that she viewed Harpole’s flight records. But it did not. Instead, Owens tripled down on her support for Snow’s false story.

63. On December 23, 2025, Owens posted to X: “🚨 Fort Huachuca Confirmed 🚨”. The body of the post claimed that she had proof that Snow was telling

the truth about Harpole and contained a screenshot of what Owens claims to be the incident report from Snow's visit to Fort Huachuca.



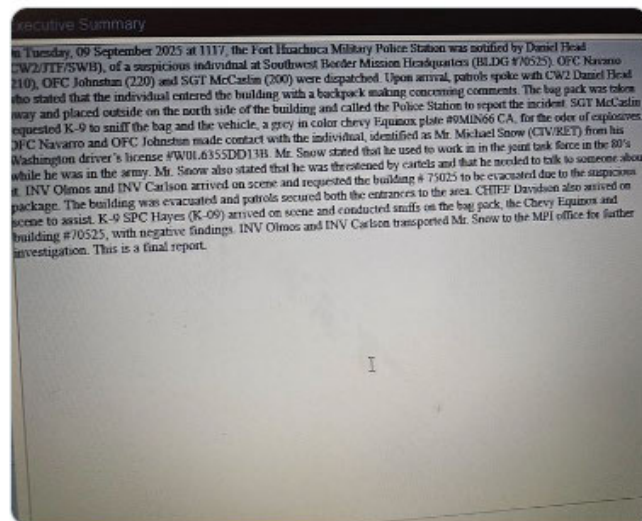
Find your favorite podcaster who joined the psychological operation to convince you Mitch was lying about having been at Fort Huachuca on 9/9 because I have just received the incident report. Remember: Mitch said he was at first taken outside by Captain Neff and questioned for a long time. After a long while, they made a decision to call the military police and report him as a possible bomb threat. As Mitch maintained, at that stage, there is of course a paper trail and here we have it. Bomb dogs were called at 11:17am.

I always believed Mitch's story of what happened on that morning because he supplied overwhelming evidence with metadata and time stamps. Now we have the incident report. What we cannot confirm as of yet, is his memory of who he is convinced he saw coming out of that early morning meeting.

We continue to focus our investigation on those points and remain open to the possibility that the people he believed he saw, may have been misidentified.

But this morning meeting is clearly important. They are sending out EVERYONE to try to delegitimize it.

Email us: [moretips@candaceowens.com](mailto:moretips@candaceowens.com) if you have more information.



2:17 PM · Dec 23, 2025 · 2.4M Views

64. Owens published this post and the attached screenshot to bolster Snow's story. However, a closer inspection of the screenshot reveals that it does not confirm the

existence of a meeting, let alone state anything about Harpole's whereabouts. This screenshot does not place Harpole at Fort Huachuca and clearly depicts a cursor on the screen, indicating that the screenshot was taken as the text was being typed. Upon information and belief, this cannot possibly be a true and authenticated "incident report," as Owens claimed it was.

65. Despite having clear evidence that Harpole was not at Fort Huachuca on September 9, 2025, Owens continued to claim that Snow's story was true. On December 28, 2025, Owens posted to X that Snow's story regarding Fort Huachuca had been legitimized by his estranged son. That same day, she also posted that the Fort Huachuca story has been "confirmed" by others. This is all false – Harpole attended no such meeting and there is no evidence suggesting such a meeting even took place.

**Candace Owens** @RealCandaceO · Dec 28, 2025  
Beyond parody...  
They were so desperate to delegitimize Mitch's testimony at Fort Huachuca that they found an estranged son who he hasn't spoken to in 20 years—who accidentally CONFIRMS Mitch's story on September 9th. 🤔👤

**Project Constitution** @ProjectConstitu · Dec 28, 2025  
🚨 EPIC FAIL: Youtuber Gary Melton's "GOTCHA INTERVIEW" With Mitch's Estranged SON Just EPICALLY BACKFIRED – His Own "Expose" CONFIRMS Mitch's STORY IS REAL 🚨  
Gary brings on Mitch's estranged son (hasn't spoken in 20 years) ...



971 2.1K 14K 680K

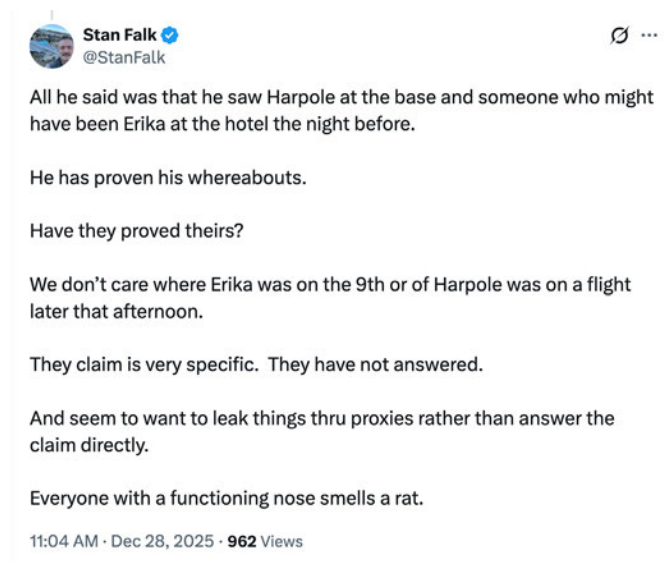
**Candace Owens** @RealCandaceO · Dec 28, 2025  
He has put in a lot of work to confirm the Fort Huachuca story and for that, we thank him.

**Baron Coleman** @baroncoleman · Dec 28, 2025  
Has anyone done more the past few days to support the story @RealCandaceO is putting forward than Gary from @paramounttactcl?  
First, he confirmed Andrew Kolvet is directing the coordinated fed slop response, and the next day confirmed Mitch Snow was at Ft Huachuc...

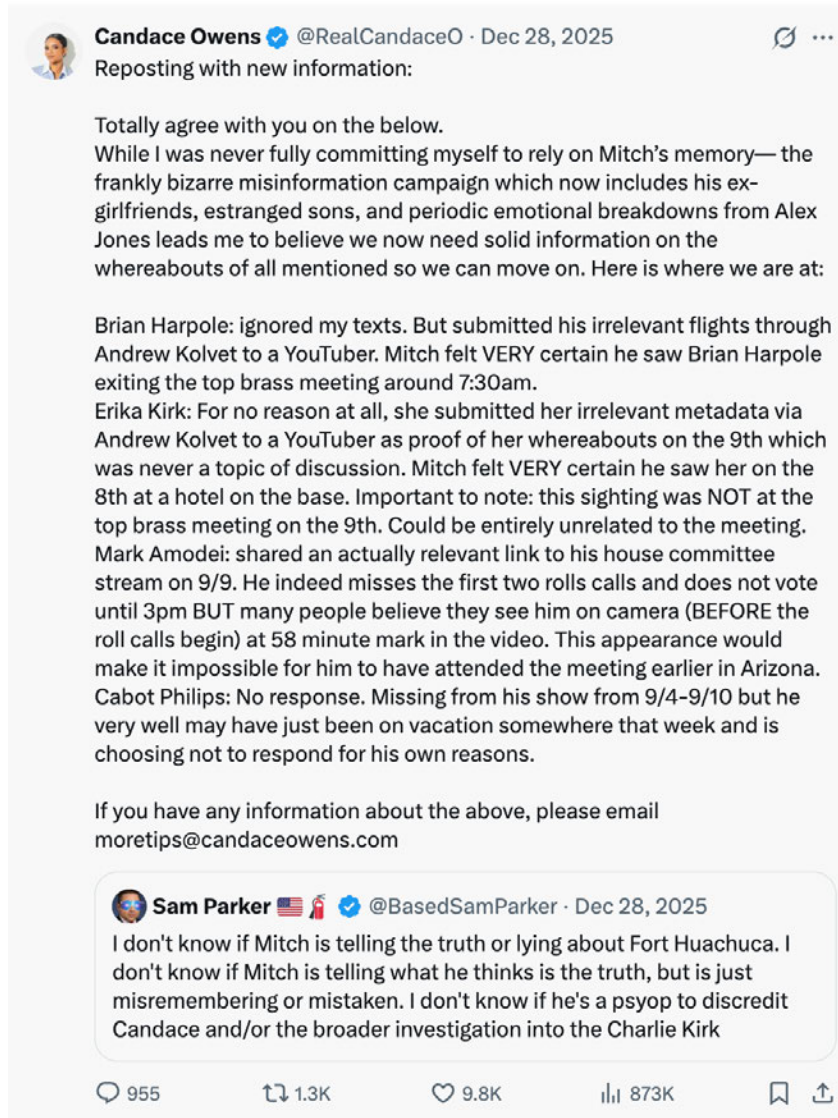
495 1K 11K 625K

66. The “evidence” Owens published did not in any way corroborate the existence of a government conspiracy to assassinate Kirk, let alone Harpole’s presence at Fort Huachuca or involvement in such a conspiracy.

67. Despite confirming that she had viewed Harpole’s flight records, Owens’s followers clearly understood her post to mean that Harpole had been at Fort Huachuca and involved in a conspiracy to assassinate Kirk:



68. Also on December 28, 2025, Owens posted to her X account that Brian Harpole ignored her texts but “submitted his irrelevant flights . . . Mitch felt very certain he saw Brian Harpole exiting the top brass meeting around 7:30am.”



69. Owens once again admitted that she viewed Harpole's flight logs, but nevertheless reaffirmed Snow's claim that he "felt very certain he saw Brian Harpole" at Fort Huachuca on September 9, 2025.

70. Sensing that her Fort Huachuca theory was slowly falling apart, Owens pivoted back to spreading misinformation regarding Harpole's fitness as Kirk's head of security and his role in Kirk's assassination.

71. On the January 8, 2026, episode of her podcast, (“The Past is Prologue: Why Charlie Kirk Was Murdered”), Owens opened the episode by stating, “we have to revisit Brian Harpole’s story about how far in advance they typically plan security because someone has leaked me another glaring oddity in this security protocol.” She then played a clip of Harpole’s lone podcast appearance where he explained the process he and his team went through ahead of Kirk’s speaking engagement at UVU. In the clip, Harpole explained that his team began gathering intel and getting permits at least two weeks in advance of Charlie Kirk’s speaking engagement.<sup>19</sup>

72. After the clip finished playing, Owens stated that she had “received a tip from someone that was directly involved with the planning of an event that Charlie Kirk was supposed to attend the following day on September 11” at Charis Bible College in Woodland, Colorado. Despite her confidence in such assertions, Owens provided no name, qualifications, or other proof that this individual was involved in planning Kirk’s security detail for the event at Charis Bible College.

73. According to Owens’s supposed tipster, there was “no security plan in place” at Charis Bible College, claiming it was odd that Harpole’s team planned Kirk’s security strategy for Utah Valley University two weeks in advance but failed to contact

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<sup>19</sup> Candace Owens, *The Past Is Prologue: Why Charlie Kirk Was Murdered* | Candace Ep 287 [0:31], (YouTube, Jan. 8, 2026), [https://www.youtube.com/watch?v=wcD2khO3rOA&list=PLPW2eH9z9CUt\\_PUXytKzBf9ZJQKMVJjOI&index=53](https://www.youtube.com/watch?v=wcD2khO3rOA&list=PLPW2eH9z9CUt_PUXytKzBf9ZJQKMVJjOI&index=53).

the Chief of Police for Woodland, Colorado, to plan security for the Charis Bible College event. Owens specifically asked, “why didn’t Dan Flood and Brian Harpole and Turning Point USA’s security have any coordination with the police departments up in Colorado if this is what they normally do[?]”<sup>20</sup> (Harpole did not coordinate with Charis Bible College nor the Woodland Police Department because he was not advised that Charlie would be visiting the school. It was not uncommon for Charlie to visit universities with only Dan Flood.)

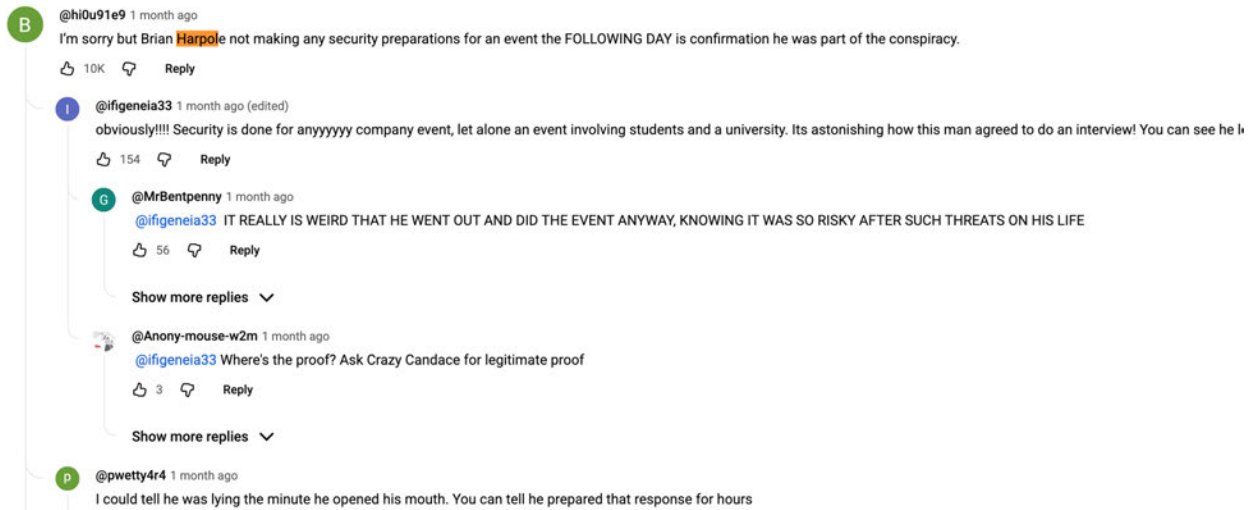
74. Owens then stated: “That's what I mean when you lie a lot and when you're planning things you're not supposed to be planning. You don't think through every detail. Yeah, as in the next day if you expected Charlie to make it to September 11th you would have been communicating about what he was doing um up at the Charis Bible College.”<sup>21</sup>

75. Owens’s followers understood the implication of her statement: The video’s comment section is filled with comments like the ones below, agreeing with Owens’s insinuation that Harpole knew Kirk was going to die on September 10, 2025, and that is why he did not make security arrangements beyond that date.

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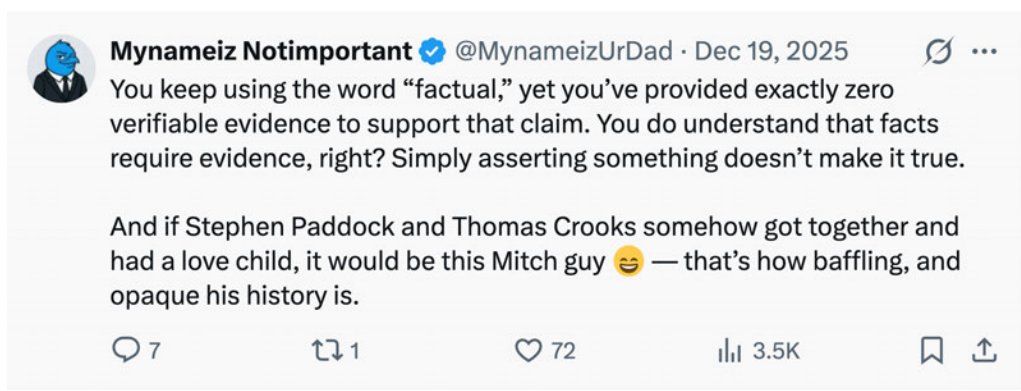
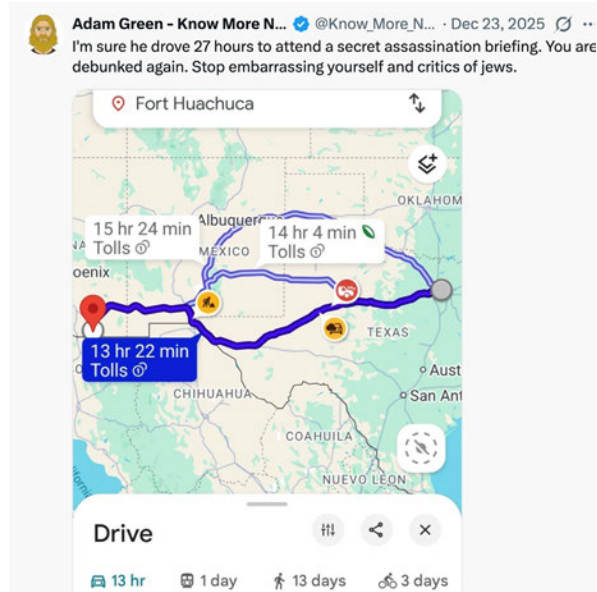
<sup>20</sup>*Id.* at 4:55.

<sup>21</sup>*Id.* at 5:39.



76. While thousands of Owens’s followers supported her efforts to promote unsubstantiated claims, others encouraged her to exercise caution. She ignored their pleas:





77. Other social media users have joined in and amplified the misinformation that has been spread by Owens:



78. Since Charlie Kirk's assassination, Owens has intentionally proliferated a campaign intended to impugn the reputation of Harpole. Without even a modicum of substantiated evidence, she has publicly accused Harpole and Integrity Solutions of foreknowledge, participation in, and cover-up of the assassination of Charlie Kirk, as well

as professional unfitness and criminal negligence. Despite Owens admitting that she had viewed Harpole's flight records, she continued to accuse him of attending a meeting at Fort Huachuca – based solely on unsubstantiated testimony from Defendant Snow. Furthermore, without any evidence that Harpole acted negligently or intentionally with regard to the assassination of Kirk, Owens spread conspiracy theories that he somehow and for some reason intended Kirk to die.

79. As a result of the false and defamatory conspiracy theories spread and published by Defendants Owens, Candace Owens, LLC, GeorgeTom, Inc., and Snow, Harpole's professional and personal reputations have been damaged. Additionally, he has lost out on business opportunities and suffered a great deal of emotional distress.

80. Since Defendants began their campaign to impugn and defame Harpole, he—on a daily basis—has been accused by thousands of people across social media platforms of murdering Charlie Kirk, a beloved and well-regarded podcaster, and a major influential voice amongst conservative Americans. Since Owens began targeting Harpole, he has lost major clients and his reputation in the security industry has plummeted.

81. In light of the above, Harpole is entitled to actual and punitive damages in an amount to be determined at trial. A reasonable award is well into the millions of dollars.

**COUNT I: DEFAMATION**

(Against Owens, Candace Owens, LLC and GeorgeTom, Inc.)

82. Plaintiff incorporates and realleges Paragraphs 1–81 as if fully set forth herein.

83. Beginning in October 2025 and continuing through the filing of this Complaint, Owens, directly and through Candace Owens LLC and GeorgeTom, Inc., has, and continues to, publish defamatory remarks accusing Harpole of foreknowledge of, involvement in, and cover-up of Charlie Kirk’s assassination. These accusations also imply criminal behavior.

84. Between December 9, 2025, and December 28, 2025, Owens, through at least eight separate statements published on X and disseminated via her podcast, falsely and negligently, if not intentionally and with reckless disregard for the truth, alleged that Harpole attended a conspiracy meeting at Fort Huachuca on the day preceding Kirk’s assassination and colluded with the government in connection with that assassination. She therefore also accused him of conspiracy to commit murder, a criminal offense.

85. These statements include, but are not limited to:

- a. Owens’s December 9, 2025, podcast in which she falsely claimed that Mitch Snow, who she describes as “credible,” saw Plaintiff at Fort Huachuca on September 9, 2025, the day before the assassination and that “[w]hen an operation is being confirmed, you have these final meetings, and they involve all the higher-ups and you are trying to do this in a very isolated

location where you know people are not going to accidentally happen upon you[.]”

- b. Owen’s description of her December 9, 2025, podcast, reading, “After today, I do not know how this leads to anything other than a full confession from the government about their [sic] involvement in Charlie Kirk’s assassination”
- c. Owens’s December 18, 2025, X post stating, “We bring you an EXPLOSIVE interview with what may be the lone eyewitness to a mysterious, top brass meeting which occurred on Fort Huachuca the day before Charlie’s assassination....”
- d. Owens’s December 18, 2025, podcast in which she published Mitch Snow’s false account of seeing Plaintiff at Fort Huachuca and claimed to have evidence confirming his narrative.
- e. Owens’s December 19, 2025, podcast in which she stated that she finds Defendant’s Snow’s narrative to be “compelling” because she was “given travel logs for Brian Harpole and it is entirely possible that Brian Harpole could have made it to that meeting.”
- f. Owens’s December 22, 2025, X post in which she stated she viewed Plaintiff’s flight records and confirmed that they did not provide an alibi.

- g. Owens's December 23, 2025, X post ""Fort Huachuca Confirmed" which contains an unsubstantiated incident report.
  - h. Owens's December 28, 2025, X post claiming that the Fort Huachuca story was legitimized by Plaintiff's estranged son.
86. Between October 27, 2025, and the filing of this Complaint, Owens has also falsely and intentionally made at least five separate statements suggesting that Harpole had foreknowledge of the assassination and actively assisted in bringing it out. Owens is falsely accusing Harpole of criminal activity, up to and including murder.
87. These statements include, but are not limited to:
- a. Owens's November 18, 2025, podcast in which she accuses Plaintiff of lying about drone availability, asking is "this how these assassinations happen?", accuses Harpole of failing to secure the UVU rooftops, and statements that Harpole should be fired.
  - b. Owens's November 19, 2025, podcast in which she again accuses Harpole of lying about drone availability.
  - c. Owens's December 12, 2025, post to X where she states, "Brian Harpole has already been caught lying about what transpired on that day. Did he also lie about having placed a 911 call? Did no one from their team call 911 after Charlie was shot?"

- d. Owens's December 16, 2025, X post where she says Brian Harpole did not pack Kirk's wound.
- e. Owens's January 8, 2026, statements that (i) "we have to revisit Brian Harpole's story about how far in advance they typically plan security because someone has leaked me another glaring oddity in this security protocol; (ii) there was "no security plan in place" at Charis Bible College, claiming it odd that Harpole's team planned Kirk's security strategy for Utah Valley University two weeks in advance, but failed to contact the Chief of Police for Woodland, Colorado, to plan security for the Charis Bible College event (iii) "[t]hat's what I mean when you lie a lot and when you're planning things you're not supposed to be planning. Yeah, as in the next day if you expected Charlie to make it to September 11th you would have been communicating about what he was doing um up at the Charis Bible College." (iv) "Why didn't Dan Flood and Brian Harpole and Turning Point USA's security have any coordination with the police departments up in Colorado if this is what they normally do[?];

88. Each of the foregoing statements constitute a separate "publication" because they were communicated to her millions of followers. Each of her statements were published on her podcast, social media accounts, and website, all of which are

controlled by Defendants Owens through her business entities Candace Owens LLC and GeorgeTom, Inc.

89. The defamatory statements were of and concerning Harpole. Owens either referred to Harpole expressly by name or made statements regarding the security team, a group sufficiently small and identifiable such that a reasonable reader or listener would understand the statements to apply to each member, including Harpole. Harpole is a member of that team and was reasonably understood by recipients of the statements to be among those accused. Owens further identified Harpole by name in connection with the same subject matter, such that, in context, a reasonable reader or listener would interpret the statements about the team as referring specifically to Harpole.

90. All of Owens's statements are either false on their face or create a false meaning reasonably conveyed by the published words. They are not protected opinions, rhetorical hyperbole, or questions without defamatory implication. It is simply false that Harpole knew Charlie Kirk was going to die or was involved in the planning, commission, or alleged cover-up of the assassination.

91. Even if some of Owens's statements are technically true, "it is no defense whatever that individual statements . . . [are] literally true when the published statement so distorted the truth as to make the entire [publication] false and defamatory. *Memphis Pub. Co. v. Nichols*, 569 S.W.2d 412, 420 (Tenn. 1978) (internal quotation marks omitted).

92. Owens's words collectively imply to a reasonable reader or viewer that Harpole had foreknowledge of the assassination and was involved in its planning, execution, and cover-up. *See SmileDirectClub, Inc. v. NBCUniversal Media, LLC*, 708 S.W.3d 556, 577 (Ct. App. Tenn. 2024). Taken as a whole, her statements concerning Harpole's presence at Fort Huachuca and his alleged security failures are reasonably understood to convey a defamatory meaning, and have in fact been so understood, as reflected in her followers' responses. The way in which her statements are juxtaposed convey the false impression that, as a matter of fact, Harpole planned for, and deliberately allowed, Kirk to die.

93. Owens published the defamatory statements concerning Harpole negligently, in that Owens failed to exercise reasonable care in verifying the truth or falsity of the statements prior to publication.

94. In addition, or in the alternative, Owens acted with actual malice, in that Defendant knew the statements were false or acted with reckless disregard for their truth or falsity. This is because, Owens, *inter alia*,

- a. Knew Harpole's plane tickets squarely placed him in Texas at the time of the alleged meeting at Fort Huachuca, Arizona.
- b. Acknowledged that Mitch Snow, and only Mitch Snow, claimed Harpole attending the alleged Fort Huachuca meeting.

- c. Treated limited evidence, much of which is of questionable veracity, that Snow was at Fort Huachuca as evidence that Harpole was also there.
  - d. Knew, based on official reports, that the investigation had revealed that Tyler Robinson alone was responsible for the assassination, but insisted that Harpole was involved.
  - e. Ignored the thousands of comments pointing out gaps in her theory alleging Harpole's involvement.
  - f. Ignored the blatant credibility issues with the "incident report," and proliferated the narrative that Harpole was at Fort Huachuca while conceding that she could not verify whether the meeting happened, let alone whether Harpole was there, because she was not in attendance.
  - g. Was aware that even if security was not planned two weeks in advance, this does not translate to foreknowledge or complicity in assassination.
  - h. Knew and conceded that Harpole ran over to Kirk with Harpole's medical bag to provide care after he was shot.
95. Owens intentionally ignored all documents and evidence contradicting her narrative and nevertheless chose to publish such statements. She additionally failed to investigate obvious doubts such as the authenticity of the incidence report.

96. Owens published these false statements on her social media accounts, via Defendants Candace Owens LLC and GeorgeTom, Inc. All three Defendants are jointly and severally liable.

97. Because Defendants published these statements with actual malice, Plaintiff is entitled to punitive damages.

**COUNT II: DEFAMATION REGARDING PROFESSIONAL UNFITNESS**  
(Against Defendants Owens, Candace Owens, LLC and GeorgeTom, Inc.)

98. Plaintiff realleges and reincorporates all prior paragraphs as if fully set forth herein.

99. To the extent this Count is duplicitous to Count I, this Count is pled in the alternative.

100. Beginning in October 2025 and continuing through the filing of this Complaint, Owens, through Defendants Candace Owens LLC, and GeorgeTom, Inc., has, and continues to, publish defamatory remarks accusing Harpole of foreknowledge of, involvement in, and cover-up of Charlie Kirk's assassination. These accusations imply professional unfitness.

101. Owens has made at least six separate statements suggesting that Harpole and his team failed to perform their duties competently, causing the death of Charlie Kirk.

102. These statements include, but are not limited to:

- a. Defendant's November 10, 2025, statement that "in real life, when you spend millions of dollars on security, on your security detail, they don't have you sitting like a sitting duck and forget to have an ambulance behind you."
- b. Defendant's November 18, 2025, statement that Plaintiff did not properly secure the perimeter during Kirk's speech and after the shooting ran over to Kirk with his small, "supposed to be" medical bag,
- c. Defendant's November 18, 2025, statement that Plaintiff lied about drone availability, that Harpole failed to secure the UVU rooftops, and that Harpole should be fired.
- d. Defendant's November 19, 2025, podcast in which she again accuses Harpole of lying about drone availability.
- e. Defendant's December 12, 2025, post to X where she states, "Brian Harpole has already been caught lying about what transpired on that day. Did he also lie about having placed a 911 call? Did no one from their team call 911 after Charlie was shot?"
- f. Defendant's December 16, 2025, X post where she says Brian Harpole did not pack Kirk's wound.

103. These statements are all "publications" as they were posted to Owens's social media platforms. Each of her statements were published on her podcast, social

media accounts, and website, all of which are controlled by Defendants Candace Owens LLC and GeorgeTom, Inc.

104. The defamatory statements were of and concerning Harpole. Owens referred to Harpole expressly by name, except in the November 10, 2025, statement, in which she referenced the security team—a group sufficiently small and identifiable such that a reasonable reader or listener would understand the statements to apply to each member, including Harpole. Harpole is a member of that team – in fact, the head of it – and was reasonably understood by recipients of the statements to be among those accused. Owens subsequently identified Harpole by name in connection with the same subject matter, such that, in context, a reasonable reader or listener would interpret the statements about the team as referring specifically to Harpole.

105. All such statements are either false on their face or create a false meaning reasonably conveyed by the published words.

106. The way in which these statements are juxtaposed convey the false impression that, as a matter of fact, Harpole is professionally unfit.

107. There is no evidence that Harpole was negligent, that he is professionally unfit, or did anything other than exercise reasonable care in discharging the duties owed to Kirk.

108. Taken together, her comments about Harpole’s alleged failure to dress the wound, call emergency personnel, fly drones, and secure rooftop access are capable of

conveying a defamatory meaning, *i.e.*, that Harpole is professionally unfit and allowed a murder to happen on his watch, and have in fact been so understood, as reflected in her followers' comments.

109. These statements, which imply professional unfitness, have harmed, and continue to harm, Harpole's reputation within his field, accuse him of breaching professional standards and the law, and risk ending or severely damaging his career, while exposing him to disgrace and ridicule within his professional community. *See McWhorter v. Barre*, 132 S.W.3d 354, 364 (Ct. App. Tenn. 2003).

110. Owens's statements are not protected opinion or rhetorical hyperbole because, when viewed in context, they convey provably false assertions of fact—specifically, that Harpole is unfit, including allegations that his team failed to call 911 and did not properly treat his wound. These statements would reasonably be understood by readers or listeners as implying verifiable facts. *See Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 20 (1990).

111. Owens published the defamatory statements concerning Harpole negligently, in that Owens failed to exercise reasonable care in verifying the truth or falsity of the statements prior to publication. Owens also acted with actual malice. She was presented with counterevidence, including official reports and thousands of comments pointing out that her assertions are unsubstantiated, but she continued to publish defamatory statements. For example, Owens disregarded the possibility of

technological error in tracking the 911 call, the possibility that Harpole called 911 after the call log was released, the possibility of the 911 records being redacted, the possibility of the call having gone through a different dispatch center, the call having been made from somebody else's phone, or the possibility that the call log sent to her was doctored. She also disregarded that it would have been illegal for Harpole to fly drones in the air space.

112. Owens knew, and conceded that, Harpole ran over to Kirk with Harpole's medical bag after he was shot but nonetheless continued to peddle a theory that Harpole is professionally unfit and should be fired for his failure to respond to the shooting.

113. Owens cherry-picked information to create a narrative that Harpole and his team failed to act during a life-threatening emergency because they were professionally unfit. *See Memphis Pub. Co. v. Nichols*, 569 S.W.2d 412, 420 (Tenn. 1978) (suggesting that the omission of material facts might in some circumstances supply the missing ingredient that would place a literally true communication in the field of implied defamation). Owens knew, and admitted publicly, that Harpole coordinated with local officials, planned security, and ran over to Kirk with a medical bag after he was shot. Nonetheless, she continued to push a narrative that it was his failure as a professional which caused Kirk's death.

114. The statements were not privileged, were not fair reports of official proceedings, and the implications are not substantially true.

115. Owens's statements accusing Harpole of such egregious professional failures has caused actual damages. His professional reputation, as well as the reputation of his company, has been injured, and he has lost business opportunities and income.

116. Additionally, because Owens published the implications maliciously, willfully, wantonly, with common law malice, with actual malice, with a conscious, reckless, and willful indifference to Harpole's rights, and with a desire to cause injury to Harpole, punitive damages are appropriate.

**COUNT III: FALSE LIGHT INVASION OF PRIVACY**

(Against Defendants Owens, Candace Owens, LLC and GeorgeTom, Inc.)

117. Plaintiff realleges and reincorporates the prior paragraphs as if fully set forth herein.

118. To the extent this Count is duplicative of Counts I and II, this Count is pled in the alternative.

119. By consistently and relentlessly painting Brian Harpole as a liar, murderer, and conspirator, and disparaging him to anybody who would listen, Owens has placed him in a highly offensive false light.

120. Such allegations would be highly offensive to any reasonable person.

121. Rather than accepting the official findings that the assassination was an unforeseeable tragedy, Owens has deliberately portrayed Harpole as a perpetrator and central participant in the cover-up of the assassination.

122. Owens intentionally placed Harpole in this false light. She disregarded all official reports, intentionally misrepresented and concealed material facts known to her, failed to investigate claims that were clearly false and misleading, selectively relied on portions of the story that fit her pre-existing narrative, and relied on unsubstantiated tips and rumors even when urged by her own followers to exercise caution.

123. As a direct and proximate result of Owens's actions, Harpole has suffered general and special damages including, without limitation, harm to his reputation, injury to his standing in the community, emotional distress (including but not limited to embarrassment, humiliation, and anxiety), loss of income, loss of business opportunities, and other pecuniary losses. These damages are of the type that normally result from invasions of privacy and false light publicity. *See generally West v. Media General Convergence, Inc.*, 53 S.W.3d 640 (Tenn. 2001).

124. Owens's tortious conduct occurred both directly and indirectly through the corporate Defendants, both of which she owns and controls and which publish her tortious conduct. All Defendants are jointly and severally liable.

**COUNT IV: DEFAMATION**  
(Against Mitch Snow)

125. Plaintiff realleges and reincorporates the prior paragraphs as if fully set forth herein.

126. On at least two separate occasions, Snow published the false and defamatory narrative that Harpole attended a top-secret meeting with "high-ranking"

military members at Fort Huachuca on September 9, 2025, as part of a plot to assassinate Charlie Kirk.

127. On or about December 8, 2025, Owens received an email from a third-party, advising her that her friend had information that she “need[ed] to hear.” Owens then reached out to and spoke with the “friend,” who she referred to as “Harry,” *i.e.* Defendant Snow, on the phone that night. During their conversation, Snow falsely and negligently, if not intentionally and with reckless disregard for the truth, told Owens that Harpole attended a conspiracy meeting at Fort Huachuca on the day preceding Kirk’s assassination and colluded with the federal government in connection with that assassination. He therefore also accused Harpole of conspiracy to commit murder, a criminal offense.

128. Snow told Owens that he saw Harpole at Fort Huachuca on September 9, 2025, the day before Kirk’s assassination, leaving a meeting with “multiple lieutenant colonels.” Snow described the meeting as one held “[w]hen an operation is being confirmed.” He further explained, “you have these final meetings, and they involve all the higher-ups and you are trying to do this in a very isolated location where you know people are not going to accidentally happen upon you[.]” With Snow’s permission, Owens would later publish and broadcast this false narrative on the December 9, 2025, episode of her podcast.

129. On December 18, 2025, Snow appeared on Owens's podcast and directly told Owens's audience his false account of seeing Harpole at Fort Huachuca. During the episode, Snow stated that he saw a congressman walking out of Fort Huachuca with several people, including multiple "high-ranking" military officials. Later, Snow stated, "the head of security there [Brian Harpole] he was one of the people walking out with the Congressman." According to Snow, he knew it was Harpole because he has "a gift for recognizing people." Snow said he saw "someone with the same mannerisms, same crick in his neck, face, waxy look on his face, hand gestures, uh, shoulder shrug, gait, approximate height, [and] haircut" as Brian Harpole "definitely walked past me." Owens then asked Snow to put it at a percentage that he was looking at Brian Harpole, Snow said he "95 to 99" percent certain he saw Harpole.

130. Each of the foregoing statements constitute a separate "publication" because they were communicated to Owens and her millions of followers. Each of her statements were published on her podcast, social media accounts, and website, all of which are controlled by Defendants Owens through her business entities Candace Owens LLC and GeorgeTom, Inc.

131. The defamatory statements were of and concerning Harpole. Snow expressly referred to Harpole and stated he saw "someone with the same mannerisms, same crick in his neck, face, waxy look on his face, hand gestures, uh, shoulder shrug, gait, approximate height, [and] haircut" as Brian Harpole, that Harpole "definitely

walked passed me,” and that he was “95 to 99” percent certain he saw Harpole at Fort Huachuca on September 9, 2025.

132. All of Snow’s statements are either false on their face or create a false meaning reasonably conveyed by the published words. They are not protected opinions, rhetorical hyperbole, or questions without defamatory implication. It is simply false that Harpole was at this alleged meeting, knew Charlie Kirk was going to die or was otherwise involved in the planning, commission, or alleged cover-up of the assassination.

133. Snow’s words collectively imply to a reasonable reader or viewer that Harpole had foreknowledge of the assassination and was involved in its planning, execution, and cover-up. *See SmileDirectClub, Inc. v. NBCUniversal Media, LLC*, 708 S.W.3d 556, 577 (Ct. App. Tenn. 2024). Taken as a whole, Snow’s statements concerning Harpole’s presence at Fort Huachuca are reasonably understood to convey a defamatory meaning, and have in fact been so understood, as reflected in Owens’s followers’ responses. The way in which his statements are juxtaposed convey the false impression that, as a matter of fact, Harpole planned for, and deliberately allowed, Kirk to die.

134. Snow published the defamatory statements concerning Harpole negligently, in that Snow failed to exercise reasonable care in verifying the truth or falsity of the statements prior to publication.

135. In addition, or in the alternative, Snow acted with actual malice, in that he knew the statements were false or acted with reckless disregard for their truth or falsity.

136. Snow published these false statements through direct communication with Owens and through Owens's podcast.

137. Because Snow published these statements with actual malice, Harpole is entitled to punitive damages.

**COUNT V: CIVIL CONSPIRACY TO DEFAME**  
(Against All Defendants)

138. Plaintiff realleges and reincorporates the prior paragraphs as if fully set forth herein.

139. "The elements for a cause of action for civil conspiracy are: (1) a common design between two or more persons, (2) to accomplish by concerted action an unlawful purpose, or a lawful purpose by unlawful means, (3) an overt act in furtherance of the conspiracy, and (4) resulting injury." *Kincaid v. South Trust Bank*, 221 S.W.3d 32, 38 (Tenn. Ct. App. 2006).

140. On or about December 8, 2025, Owens received an email from an unknown third-party recommending that Owens reach out and speak to Snow because he possessed information she "need[ed] to hear."

141. That evening, Owens phoned Snow and spoke with him. During the conversation, Snow conveyed to Owens a fabricated account claiming that Harpole had participated in a conspiracy with the United States to assassinate Kirk, alleging that he had seen Harpole leaving a meeting with senior military officials at Fort Huachuca on September 9, 2025—the day before Kirk was killed.

142. Seeing an opportunity to profit from making headlines and national news, Snow and Owens agreed to and entered a conspiracy to defame Harpole. Owens and Snow agreed that Owens would use her network, including her podcast, website, and social media accounts (all of which are owned and controlled by either Candace Owens, LLC or GeorgeTom, Inc.) to promote and publish Snow's defamatory story that Harpole was involved in a plan with the United States military to have Charlie Kirk assassinated.

143. Owens then acted in furtherance of the conspiracy by recounting Snow's story to her millions of followers on the December 9, 2025, episode of *Candance*. During the episode, Owens informed her audience that Snow witnessed Harpole with "twelve lieutenant colonels" who were participating in a "pretty important meeting," at Fort Huachuca on September 9, 2025. According to Owens, the meeting was described as the type that is typically held "ahead of an operation." Owens reported that Snow told her: "When an operation is being confirmed, you have these final meetings, and they involve all the higher-ups and you are trying to do this in a very isolated location where you know people are not going to accidentally happen upon you[.]"

144. Owens promoted the podcast episode on her X account by posting: "Today on the show: I received SHOCKING information which puts Charlie's last trip to Asia in a new light. And it involves his security detail, Brian Harpole. This will shock your senses but I feel this information must be presented. Join us LIVE."

145. After the December 9, 2025, episode aired, Owens, in furtherance of the conspiracy, used her X account, which is managed and controlled by Candace Owens, LLC, to further spread the conspiracy theory. For example, Owens made a post to her X account which claimed her podcast, “presented that a man in the military [Snow] alleges with extreme confidence that he saw Brian Harpole at a military base in Arizona on September 9th.”

146. Following the December 9, 2025, episode of her podcast, Owens contacted Snow a second time to invite him onto her podcast so that he could directly tell his false story to her millions of followers.

147. On December 18, 2025, Owens uploaded Episode 282 of *Candace*, which consisted of an almost 45-minute interview with Snow. During the interview, Snow stated he saw “someone with the same mannerisms, same crick in his neck, face, waxy look on his face, hand gestures, uh, shoulder shrug, gait, approximate height, [and] haircut” as Brian Harpole “definitely walked passed me” at Fort Huachuca. Owens then asked Snow how certain he was that he saw Harpole at Fort Huachuca on September 9, 2025, and Snow responded that he was “95 to 99” percent certain that he saw Harpole leaving a “top brass” military meeting that morning.

148. Following the December 18, 2025, episode, Owens continued to make posts in support of Snow’s story and claim that Snow’s story was confirmed as true.

149. To this day, Owens has not expressly denied the Fort Huachuca conspiracy theory, nor has she expressed any doubts as to Snow's narrative; in fact, she has tripled down on her support for the false Fort Huachuca theory. Thus, both Owens and Snow are still actively engaged in their conspiracy to defame Harpole.

150. As a direct and proximate cause of the Defendants' tortious actions, Harpole suffered damages to his professional and personal reputations. Additionally, he has lost out on business opportunities and suffered a great deal of emotional distress.

**COUNT VI: AIDING & ABETTING DEFAMATION**

(Against Defendants Owens, Candace Owens, LLC and GeorgeTom, Inc.)

151. Plaintiff realleges and reincorporates the prior paragraphs as if fully set forth herein.

152. As alleged above, on at least two separate occasions, Snow published the false and defamatory narrative that Harpole attended a top-secret meeting with "high-ranking" military members at Fort Huachuca on September 9, 2025, as part of a plot to assassinate Charlie Kirk.

153. Snow spread his fallacious story about Harpole when he told Owens that he saw Harpole leaving a meeting with "multiple lieutenant colonels," which he described as a meeting held "[w]hen an operation is being confirmed." He further explained, "you have these final meetings, and they involve all the higher-ups and you are trying to do this in a very isolated location where you know people are not going to accidentally happen upon you[.]" Snow further defamed Harpole when he appeared on

Owens's podcast and directly told Owens's audience his false account of seeing Harpole at Fort Huachuca. Snow stated, "the head of security there [Brian Harpole] he was one of the people walking out with the Congressman." According to Snow, he knew it was Harpole because he has "a gift for recognizing people." Snow said he saw "someone with the same mannerisms, same crick in his neck, face, waxy look on his face, hand gestures, uh, shoulder shrug, gait, approximate height, [and] haircut" as Brian Harpole "definitely walked past me." Owens then asked Snow to put it at a percentage that he was looking at Brian Harpole, Snow said he "95 to 99" percent certain he saw Harpole.

154. Owens, Candace Owens LLC, and GeorgeTom, Inc. published Snow's defamatory statements concerning Harpole negligently, in that Owens failed to exercise reasonable care in verifying the truth or falsity of the statements prior to publication. Mitch Snow has virtually no reach – he was platformed by Owens. These Defendants aided and abetted Snow's defamation by expanding the reach and impact of the defamation and by providing legitimacy to the defamation.

155. Additionally, Owens acted with actual malice, in that she knew the statements were false or acted with reckless disregard for their truth or falsity because, Owens, *inter alia*:

- a. Knew Harpole's plane tickets squarely placed him in Texas at the time of the alleged meeting at Fort Huachuca, Arizona.

- b. Acknowledged that Mitch Snow, and only Mitch Snow, claimed Harpole attending the alleged Fort Huachuca meeting.
- c. Treated limited evidence, much of which is of questionable veracity, that Snow was at Fort Huachuca as evidence that Harpole was also there.
- d. Ignored the thousands of comments pointing out gaps in her theory alleging Harpole's involvement.
- e. Ignored the blatant credibility issues with the "incident report," and proliferated the narrative that Harpole was at Fort Huachuca while conceding that she could not verify whether the meeting happened, let alone whether Harpole was there, because she was not in attendance.

156. Owens assisted Snow in spreading his defamatory story by using her network, including her podcast, website, and social media accounts (all of which are owned and controlled by either Candace Owens, LLC or GeorgeTom, Inc.) to platform Snow and amplify his fallacious story that Harpole was involved in a conspiracy with the United States military to have Kirk assassinated. But for the involvement of Owens, Candace Owens LLC, and GeorgeTom, Inc., Snow's false Fort Huachuca story would not have reached the millions of people it ultimately did.

157. As a direct and proximate cause of the Defendants' tortious actions, Harpole suffered damages to his professional and personal reputations. Additionally, he lost out on business opportunities and suffered a great deal of emotional distress.

**JURY TRIAL DEMAND**

158. Harpole demands a jury trial on all counts so triable.

**PRAYER FOR RELIEF**

Plaintiff Brian Harpole prays this Court:

- i. Enters judgment in his favor and against, jointly and severally, Defendants Candace Owens, Candace Owens, LLC, GeorgeTom, Inc., and Mitchell Snow;
- ii. Issues a narrowly tailored permanent injunction requiring the removal of the defamatory statements from the Defendants' various social media accounts, and enjoining Defendants from republishing or reposting the deleted media and similar such statements in the future;
- iii. Awards compensatory damages, including economic damages for lost income and non-economic damages for mental anguish, pain, and suffering, in an amount to be proven at trial;
- iv. Awards punitive damages for Defendants' intentional, egregious, and malicious conduct;
- v. Awards taxable costs against all Defendants; and
- vi. Awards any further relief the Court deems necessary and appropriate.

Respectfully submitted,



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*\*Pro hac vice to be filed*