

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Fort Worth Division

JOHN SABAL)	
)	
Plaintiff,)	
)	
v.)	Case No. <u>4:23-cv-551</u>
)	
LIN WOOD)	TRIAL BY JURY
)	IS DEMANDED
Defendant.)	
_____)	

COMPLAINT

Plaintiff, John Sabal (“Plaintiff” or “Sabal”), by counsel, files the following Complaint against Defendant, Lin Wood (“Wood”).

Plaintiff seeks (a) compensatory damages and punitive damages in the sum of **\$10,000,000.00** or such greater amount as is determined by the Jury, (b) prejudgment interest on the principal sum awarded by the Jury from June 1, 2022 to the date of Judgment, and (c) court costs – arising out of Defendant’s defamation.

I. PARTIES

1. Sabal is a citizen of Texas. He lives in Southlake (Tarrant County). John is a Christian business man, social influencer and conservative event promoter. He owns *The Patriot Voice* (“TPV”), a grassroots organization that showcases pertinent and dynamic speakers, whose messages are timely and relevant. Sabal organizes events for patriots who love God and this country. TPV’s events have featured conservative speakers, including Lieutenant General (Retired) Michael T. Flynn (“General Flynn”),

Texas attorney Sidney Powell, and legendary American recording artist Aaron Lewis. The qualities disparaged by Wood and #FightBack – Sabal’s reputation for truthfulness, honesty, veracity, integrity, ethics, devotion to God and loyalty to country – are peculiarly valuable to Sabal and are absolutely necessary in his business. Wood and #FightBack ascribed to Sabal conduct, characteristics and conditions, including the commission of multiple crimes, that adversely affected Sabal’s fitness to be a Christian influencer and conservative event organizer.

2. Wood is a citizen of Georgia. He was a prominent attorney, who appeared as counsel many times in Texas Federal and State Courts.¹ Wood and #FightBack Foundation, Inc. (“FightBack”) operate a channel on the cloud-based social messaging application Telegram called **@linwoodspeakstruth**. The channel has 385,000+ subscribers, many of whom live and work in Texas. #Fightback is a Texas 501(c)(4) organization, whose mission it is to “#FightBack against the corrupt court systems that further political and personal agendas. We stand up to the tyrants who have transformed our once impartial judiciary into a travesty of the rule of law.” Wood uses Telegram and

¹ In 2021, Wood was sanctioned by the United States District Court for the Eastern District of Michigan for filing a lawsuit that “represents a historic and profound abuse of the judicial process” and an attempt to “deceiv[e] a federal court and the American people into believing that rights were infringed, without regard to whether any laws or rights were in fact violated.” The District Court ruled that Wood and his co-counsel “scorned their oath, flouted the rules, and attempted to undermine the integrity of the judiciary along the way.” And even after the Court issued its decision finding plaintiffs’ claims barred under multiple legal theories, their counsel “brazenly assert[ed] that they ‘would file the same complaints again.’ [Plaintiffs’ attorneys] ma[de] this assertion even after witnessing the events of January 6 and the dangers posed by narratives like the one counsel crafted here.” The Court found sanctions necessary to deter such “dangerous behavior” in the future. *King v. Whitmer*, 2021 WL 5711102, at * 9 (E.D. Mich. 2021). In addition to Michigan, Wood faces disbarment proceedings in Georgia. *See Wood v. Frederick*, 2022 WL 1742953 (11th Cir. 2022).

#FightBack solicit donations from Texans. Wood is Chairman of the Board and CEO of #FightBack. [<https://www.fightback.law/l-lin-wood>].

II. JURISDICTION AND VENUE

3. The United States District Court for the Northern District of Texas has subject matter jurisdiction over this action pursuant to Title 28 U.S.C. § 1332 (Diversity). The parties are citizens of different States. The amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

4. Wood is at home in Texas and is subject to general personal jurisdiction and specific personal jurisdiction in Texas.

5. Venue is proper in this Court pursuant to Title 18 U.S.C. §§ 1391(b)(1) and (b)(2). The statements at issue targeted a Texas citizen and were intentionally published and republished throughout Texas, including in the Northern District, where Sabal suffered substantial injury.

III. STATEMENT OF MATERIAL FACTS

6. Within the past year, Wood and #FightBack published the following false and defamatory statements and implications about Sabal:

- “QAnon John Sabal is a Mike Flynn minion. ★★ ★ That means that ★★ ★ John is liable for Flynn’s acts of blackmailing, threatening, and intimidating my children. You missed in your Deep State efforts to cut me down, ★★ ★ John. I pray that you confess and repent ★★ ★ John. Otherwise, God is going to cut you down, ★★ ★ John. I pray for you, ★★ ★ John. I don’t want anyone to spend eternity in hell, ★★ ★ John. Not even my enemies, ★★ ★ John.”²

² Accompanying Wood’s June 1, 2022 Telegram post was a link to the official music video of Johnny Cash’s song “**God’s Gonna Cut You Down**”. [<https://www.youtube.com/watch?app=desktop&v=eJIN9jdQFSc>]. The post’s defamatory implication is clear: Sabal is a “long tongue liar”, a sinner, working in the dark against his fellow man.

- “You feeling the love, ★★John??? WATCH OUT!!! You may soon be feeling the heat, ★★ John!!! REAL Patriots are not stupid, ★★ John. They know who your [sic] are, ★★ John. I wish you good luck, ★★ John. I pray for my enemies, ★★ John. I even pray for communists, ★★ John. I pray for you, ★★ John.”
- “I have had my eyes on Ol’ QAnon John from the very beginning. He thought he was playing me. I was playing him to expose him as a FAKE Patriot.”
- “Deep State operatives are communists. Consistent with communism, they are masters of deceit and disguise. Many are disguised as ‘Patriots’ but are in fact FAKE Patriots. They are communist infiltrators ... I am not creating ‘division,’ I am identifying communists. Communists are the enemy within. They are Godless. They are snakes. I do not want to be united with communists ... Go back and research who I have exposed over the past many months. Make a list. They are ALL communists. Communists are ALL Godless. This is THE battle between good v. evil, the Holy Spirit v. the spirit of the anti-Christ, God v. the devil.”
- “I called out this FAKE Patriot below when he postponed a ‘Patriot’ event but kept collecting registration fees for weeks without telling the TRUTH about the ‘alleged; postponement of the event. Then he delayed refunds and many REAL Patriots have still not received their money back. Fraud. I also knew this FAKE Patriot created the illusion of a ‘break’ from Fraud Flynn to try to curry my favor and build his ‘followers’ off my reputation as a REAL Patriot which I am ... I guess this FAKE Patriot resents President Trump because of his wealth which is light years higher than mine. This FAKE Patriot lives off of scamming REAL Patriots. Shout him down and shun him.”
- “I usually do not ‘make fun’ of my enemy. Even when I do, I still pray for my enemy. But I know for a fact that David ‘Deep State Flim Flam Flynn Operative’ Hancock has been involved in blackmailing, intimidating, and threatening my children. And my former law colleagues. Fraudcock works under the direction of Mike ‘Flim Flam’ Flynn. And so do all the other Disney characters. They are all responsible for the acts of the conspiracy even if their roles were relatively minor. Like the roles of QAnon John and Amy of The Patriot Voice. When you mess with my relationship with my children and keep me from seeing them and my grandson for 2+ years, and cause them to live in fear, I am hot-blooded. And I will be relentless in taking those reprobates down.”

- “Who is REALLY trying to ruin my reputation, silence my voice, damage me financially, and prevent me from practicing law??? The State Bar of Georgia or Flim Flam Flynn and his comrades??? Or both??? State Bar of Georgia + Flim Flam Flynn = Deep State. Deep State members and operatives are communists. Do the research. Connect the dots.”
- “To say that ‘the devil is inside’ of someone is blasphemy. That person is saying that he or she knows what only God knows. That person is equating himself or herself to God. So I pray for John Sabal of The Patriot Voice ... I don’t want anyone to spend eternity in hell. These people really do not know of what they do. The devil is always trying to suppress the speech of someone who speaks TRUTH and shares Jesus Christ with others. We do not battle flesh and blood. Pray for these people. They are lost. I pray they will be found.”
- “Oh no!!! ‘Believe me.’ Did anyone believe John Sabal when he posted on social media that I was ‘satan???’ QAnon John needs to read the Holy Bible to learn about the REAL PERMANENT BLACKLIST. That blacklist is ETERNAL. Pray for John and Amy. I do.”

Wood, #FightBack and agents enlisted by Wood (pseudo anonymous accounts called “Buck Nasty Exposed” and “The Breb Room”³) repeatedly accused Sabal of committing fraud and stealing from his supporters. They went so far as to dox Sabal and his wife’s work address. In a June 4, 2022 Telegram post, Wood and #FightBack stated “good luck on getting your money back from Qanon John. A Deep State grifter is a Deep State grifter.⁴ Always has been. Always will be.” In a July 11, 2022 Telegram post, Wood and #FightBack accused Sabal of fraud and embezzlement:

³ The Breb Room republished virtually every one of Wood and #FightBack’s Statements. The Breb Room called Sabal a “con” man.

⁴ Readers of Wood and #FightBack’s social media posts could reasonably find that Wood and #FightBack were attempting to communicate a true statement of fact, *i.e.*, that Sabal stole from his donors and supporters, gained his funds illicitly, and/or that he is a scam artist who has engaged in fraud or trickery to obtain money or goods from people. *See Meyers v. Tempesta*, 2013 WL 93025, at * 8 (Cal. App. 4th DCA 2013) (accusation that plaintiff is a “grifter” could have been construed by a reasonable reader to suggest a provably true fact).

Did you refund ALL the people you ripped off in connection with your last "event" for which you continued to collect fees weeks after you knew it would be postponed (or never happen)???

Or did you buy another Elon Musk Tesla???

In a September 26, 2022 Telegram post, Wood and #FightBack stated that:

It is against the law to misappropriate someone's name or likeness for your own personal benefit.

Surely you have enough legal problems now and coming in the future.

Isn't enough always enough, TPV Jon???

I pray for my enemies, TPV Jon.

Wood used his high-profile status to amplify the Statements and publish them to a vast audience, including prospective supporters, donors and beneficiaries of #FightBack in Texas. Wood and #FightBack's Telegram posts of or concerning Sabal held Sabal up to distrust, public ridicule and contempt:

Simple TRUTH: "If someone cheats or scams you on one thing, that person is a cheater and a scammer. You cannot trust that person going forward. That person will cheat you and scam you again and again. Cheating and scamming are addictive until the cheater and scammer is caught and punished."

Moral: Make sure you demand an immediate refund for any amount paid for a "Patriot" event that is rescheduled after you paid your registration fee. If not refunded promptly, ask your **credit card** company to reverse the charges. If the cheater and scammer gets enough requests for reversal, the **credit card** company will cancel the cheater and scammer.

Remember, until your money is returned, the cheater and scammer has use of YOUR money.

Just sayin.!

Lin 🙏❤️🇺🇸

www.FightBack.law

👁 67.6K 9:46 PM

(each of the above is a “Statement” and together they are the “Statements”).

COUNT I – DEFAMATION

7. Sabal restates paragraphs 1 through 6 of this Complaint, and incorporates them herein by reference.

8. Wood made, published and republished numerous false factual Statements of and concerning Sabal. These false Statements are detailed verbatim above in paragraph 6. Wood published the false statements without privilege of any kind.

9. The Statements constitute defamation or defamation by implication. The Statements accuse and impute to Sabal multiple crimes, an unfitness to perform the duties of an office or employment for profit and want of integrity in the discharge of those duties, including lack of integrity, immorality, ethical improprieties, dishonesty, deception, lying and fraud. The Statements severely prejudice Sabal in his profession and employment.

10. Wood’s false and defamatory Statements harmed Sabal and his reputation, causing special damages, including loss of donors and supporters, presumed damages and actual damages.

11. Prior to filing this action, Sabal complied with the Texas Defamation Mitigation Act (the “DMA”). *Tex. Civ. Prac. & Rem. Code § 73.051 et seq.* Sabal served on Wood at the place of publication a written notice specifying the Statements that are defamatory and demanding, *inter alia*, that those statements be retracted and/or corrected and removed from the Internet. Wood failed or refused to retract and correct the false and defamatory Statements.

12. Wood published the Statements with actual knowledge that they were false or with reckless disregard for the truth. Wood fabricated facts about Sabal out of whole cloth in retaliation for Sabal exposing Wood's hypocrisy on Telegram. Wood publicly declared war on Sabal with the intent to inflict harm on Sabal's reputation through injurious falsehoods. Wood did not hide his extreme bias, hatred, ill-will for Sabal. Wood deliberately targeted Sabal's conservative, pro-Trump donors and followers, by painting a picture that Sabal was a communist who promoted an anti-Trump agenda. On May 19, 2022, for instance, Wood published the following statements to his 385,000 subscribers on Telegram:

“Sorry to vent but I do not like it when Deep State operatives drag my children into their political attacks on me to further their communist, anti-Trump agenda. Hey, QAnon John, come back to Tomotley⁵ for another visit. You loved me when you came here to use me to line your grifter pockets. I knew who you were from then [sic] beginning. I know who you are now, Johnny Boy. You will not come back to Tomotley because you are a coward. I pray for my enemies. I do not want anyone to spend eternity in hell. Not a good place. And I forgive them. In order to be forgiven, we must forgive. But that does not mean that I must sit quietly on the sidelines when they spew their venomous lies and involve my family. I have the right to speak TRUTH and set the record straight. I have the right to tell it like it is.”

Wood and #FightBack agents “Buck Nasty” and The Breb Room falsely accused Sabal of being a Federal agent, and falsely stated that Sabal had a “Pedo-smile”. For his part, Wood implied that Sabal was a member of “Mossod [sic]” or a member of the “CIA”. Wood defamed and disparaged Sabal for months. On May 29, 2022 at 2:59 a.m., Wood threatened Sabal via text message:

⁵ “Tomotley” is a reference to Wood's plantation estate in South Carolina. “Tomotley Talks” is a podcast produced and broadcast in Texas by Wood and #FightBack. [<https://www.buzzsprout.com/1931646>].

May 29, 2022 at 2:59 AM

Sleeping well these nights, John?
How about Mike Flynn, your co-
conspirator, John? Asking for a
Friend, John. A Friend you do not
know, John. My Friend knows
everything, John. WATCH OUT, John.
Conspiracies have consequences,
John. My Friend will be watching your
"interview" with Fraudcock, John.
Better re-think what you are doing,
John. My Friend is powerful, John. I
pray for you, John. - Lin 🙏❤️🇺🇸

The "Friend" Wood referred to in the text (fraudulently) was President Trump.

13. As a direct result of Wood's defamation, Sabal suffered special damages, presumed damages and actual damages, including, but not limited to, loss of income and future earning capacity, insult, pain, embarrassment, humiliation, mental anguish (present and future), injury to his reputation (present and future), costs and other out-of-pocket expenses, in the sum of \$10,000,000.00 or such greater amount as is determined by the Jury.

Sabal alleges the foregoing based upon personal knowledge, public statements of others, and records in his possession. Sabal believes that substantial additional evidentiary support, which is in the exclusive possession of Wood and #FightBack, their agents and other third-parties, will exist for the allegations and claims set forth above after a reasonable opportunity for discovery.

Sabal reserves his right to amend this Complaint upon discovery of additional instances of Wood's wrongdoing.

CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the Court to enter Judgment against Wood as follows:

- A. Compensatory damages in the amount of \$10,000,000.00;
- B. Punitive damages in an amount to be determined by the Jury;
- C. Prejudgment interest on the principal sum awarded by the Jury at the maximum rate allowed by law;
- D. Postjudgment interest at the maximum rate allowed by law;
- E. Costs and other recoverable amounts as allowed by law;
- F. Such other relief as is just and proper.

TRIAL BY JURY IS DEMANDED

DATED: June 1, 2023

JOHN SABAL

By: /s/ Madhu S. Sekharan

Madhu S. Sekharan, Esquire

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(Motion for Admission Pro Hac Vice

To be Filed)

Counsel for the Plaintiff

CIVIL COVER SHEET

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

I. (a) PLAINTIFFS

JOHN SABAL

(b) County of Residence of First Listed Plaintiff Tarrant County, TX (EXCEPT IN U.S. PLAINTIFF CASES)

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

Madhu S. Sekharan (Texas Bar No. 24072332) 16614 Radiant Lilac Trail, Cypress, TX 77433 (281-304-6369)

DEFENDANTS

LIN WOOD

County of Residence of First Listed Defendant Georgia (IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

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

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

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

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, 1 1, 2 2, 3 3, 4 4, 5 5, 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes codes like 110 Insurance, 310 Airplane, 365 Personal Injury, etc.

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

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

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. Section 1332. Brief description of cause: Defamation

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 10,000,000. CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 06/01/2023 SIGNATURE OF ATTORNEY OF RECORD /s/ Madhu S. Sekharan

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE