

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

PATRICK NATHANIEL REED,  
c/o 22 Philbrook Way  
Woodlands, TX, 77382

Plaintiff,

v.

SHANE RYAN,  
2706 Ellen St #3R  
Durham, NC, 27705

And

HACHETTE BOOK GROUP, INC  
1290 6<sup>th</sup> Ave  
New York, NY 10104

And

DOUG FERGUSON  
c/o 1 Riverside Avenue  
Jacksonville, FL, 32202

And

THE ASSOCIATED PRESS  
200 Liberty Street  
New York, NY 10281

And

FOX SPORTS, INC.  
12181 Bluff Creed Dr.  
Playa Vista, CA, 90094

And

NYP HOLDINGS, INC.

**COMPLAINT**

**Related to *Reed v. Chamblee at al*, 3:22-cv-01059-TJC-PBD (M.D. FL.)**

d/b/a The New York Post  
1211 Avenue of the Americas  
New York, NY 10036

And

GAVIN NEWSHAM  
c/o 1211 Avenue of the Americas  
New York, NY 10036

Defendants.

## **I. INTRODUCTION**

Plaintiff PATRICK NATHANIEL REED (“Mr. Reed”) or (“Plaintiff”) brings this action against Defendants SHANE RYAN (“Ryan”), HACHETTE BOOK GROUP, INC (“Hachette”), DOUG FERGUSON (“Ferguson”), THE ASSOCIATED PRESS (“AP”), FOX SPORTS, INC. (“Fox Sports”), NYP HOLDINGS, INC (“New York Post”), and GAVIN NEWSHAM (“Newsham”) acting in concert as joint tortfeasors, jointly and severally, in this civil action for general defamation, defamation per se, defamation by implication, injurious falsehoods, tortious interference and civil conspiracy as a result of Defendants’ causing actual damages, compensatory damages, and giving rise to punitive damages, including continuing and aggravated harm to Mr. Reed’s professional, business and personal reputation and livelihood. As grounds therefore, Mr. Reed alleges as follows:

## **II. JURISDICTION AND VENUE**

1. This Court has diversity jurisdiction over this case pursuant to 28 U.S.C. § 1332, as the parties are completely diverse in citizenship and the amount in controversy exceeds \$75,000.

2. Venue is proper pursuant to 28 U.S.C. § 1391(b)(3) in that this is a district in which a substantial part of the events or omissions giving rise to Plaintiff’s claim occurred, as

this case is related to *Reed v. Chamblee et al*, 3:22-cv-01059 (M.D. Fl.) (the “*Chamblee Case*”) filed in this Court, and Defendant PGA Tour is located in this judicial district.

3. The Court may exercise personal jurisdiction over the Defendants pursuant to Fla. Stat. § 48.193(1)(a)(2) because they committed the tortious act of defamation, injurious falsehoods, tortious interference and civil conspiracy within the state of Florida by broadcasting and publishing their defamatory statements to individuals within Florida, as well as committing the other alleged illegal acts. Further, because Defendants all conduct substantial business regularly in Florida, they have more than sufficient minimum contacts with the state so as to satisfy the due process requirements of the Constitution.

4. Defendant AP is registered with the Florida Secretary of State to do business in Florida.

5. Defendant New York Post, as per their website<sup>1</sup>, lists “most of Florida” as one of the only six geographic areas in the United States where they provide home delivery service, in addition to Boston, Philadelphia, Washington DC, Los Angeles, and Las Vegas. Thus, they conduct substantial business regularly in Florida.

6. Defendant Fox Sports also has a permanent presence in Florida, with an office in Fort Lauderdale, as well as a Florida specific Twitter handle, @FoxSportsFL.

### **III. PARTIES**

7. Mr. Reed is an individual, natural person who is a citizen of the state of Texas and a resident of both Texas and Florida. He has a residences in both TheWoodlands, Texas and Kissimmee, Florida.

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<sup>1</sup> <https://nypost.com/subscription-help/>

8. Defendant Ryan is an individual, natural person who is a citizen of the state of North Carolina.

9. Defendant Hachette is incorporated under the laws of Delaware, with headquarters in New York.

10. Defendant Ferguson is an individual, natural person who is a citizen of Florida, and specifically, this judicial circuit.

11. Defendant AP is incorporated under the laws of New York with headquarters in New York.

12. Defendant Fox Sports is incorporated under the laws of Delaware, with headquarters in California.

13. Defendant New York Post is incorporated under the laws of Delaware, with headquarters in New York.

14. Defendant Newsham is an individual, and on information and belief a citizen and resident of the United Kingdom. On information and belief, he is employed by Defendant New York Post and/or Fox Sports as a writer.

#### **IV. STANDING**

15. Mr. Reed has standing to bring this action because he has been directly affected and victimized by the unlawful conduct complained herein. His injuries are proximately related to the intentional and malicious conduct of Defendants, each and every one of them acting in concert jointly and severally, as joint tortfeasors.

#### **V. FACTS**

##### **BACKGROUND FACTS**

16. Mr. Reed is a professional golfer who began his career after winning back-to-back NCAA Championships at Augusta State University and started his professional career by “Monday-qualifying” for PGA Tour events in 2012 with his then fiancé and now wife caddying for him. The duo earned Mr. Reed his PGA Tour Card through qualifying school (q-school) for the PGA Tour in 2012. Together, they won their first PGA tournament in their first season on the PGA Tour at The Wyndham Championship in 2013 at Sedgefield Country Club in North Carolina. Mr. Reed was 23 years old. Since his first win, Mr. Reed has gone on to win a total of 9 PGA Tournaments, including his first major championship victory in 2018, at The Masters in Augusta, Georgia, at the age of 27. He became a dual member of the PGA Tour and the European Tour in 2015 and successfully made it to each tour’s grand finale for the best players in the world, The Tour Championship and the Race to Dubai. He is not only a Masters Champion, but also a 9-Time PGA Tour champion, an eight-time United States Team member, an Honorary Lifetime Member of the DP World Tour, and has had a very successful playing career, having just turned 32 years-old. He also started The Team Reed Foundation which serves many local and nationwide charities and foundations in the Houston area as well as nationwide. He hosts the Patrick Reed American Junior Golf Association’s (“AJGA”) Tournament every year in The Woodlands, Texas and his AJGA Tournament is the most heavily-awarded event in AJGA history. He also supports and gives to the APGA which helps support African American and other minority golfers to compete and win at the highest level of professional golf and helps support up-and-coming golfers by providing custom golf equipment through grindworksUSA and the Team Reed Foundation. He was a voting member on the PGA Tour and consistently made it to the Tour Championship every year from 2014 through 2021. Mr. Reed has been the only American to play on both the DP World Tour (“European Tour”) and the PGA Tour since

2015. He is also the only 2-Time American Olympian Golfer for the United States, having competed in the 2016 Rio De Janeiro Olympic Games and the 2020 (2021) Olympic Games in Japan. Mr. Reed is a global professional golfer and, to sum it all up, his 9 PGA Tour wins consist of: Two World Golf Championships, two FedEx Cup Play-Off Events, and a major championship at the 2018 Masters Tournament. Mr. Reed is currently one of the most successful and accomplished professional golfers in the world since beginning his career at age 22. He was ranked as high as six (6) in the Official World Golf Ranking as late as 2020 and has remained a top player in the world since earning his PGA Tour card in 2013 and has continued to proudly represent the United States worldwide on team events and individually since 2014.

17. And to put this all in perspective, Mr. Reed is the youngest World Golf Champion ever, beating out Tiger Woods' record by 26 days. Mr. Reed won in his debut World Golf Championship event at Trump International's "Blue Monster" in Doral, Florida at the age of 23. Last, but hardly least, Mr. Reed is also only the fourth American golfer to receive an Honorary Lifetime Membership on the European Tour, the previous three Americans to receive such an honor were the late Arnold Palmer, Jack Nicklaus, and Tom Watson. Reed also holds three PGA Tour records.

18. Mr. Reed has represented the United States of America eight (8) times in the Ryder Cup, Presidents Cup and the Olympic Games. In 2014 and 2016, Mr. Reed was the leading point scorer for the American Ryder Cup team, which earned him the nickname "Captain America."

19. Despite his exceptional world-class golfing achievements, in June of 2022, Mr. Reed was constructively terminated as a member of the PGA Tour, as a result of threats made

and actions taken by the PGA Tour and its Commissioner Jay Monahan (“Monahan”) and he later signed with LIV Golf.

20. To compound matters, both before and in furtherance of the threats made and actions taken by the PGA Tour and Monahan to constructively terminate Mr. Reed, Defendants have conspired as joint tortfeasors for and with the PGA Tour, Monahan, and the Defendants in the *Chamblee* Case to engage in a pattern and practice of defaming Mr. Reed, misreporting information with actual knowledge of falsity and/or reckless disregard of the truth, that is with actual and constitutional malice, purposely omitting pertinent key material facts to mislead the public, as set forth below.

21. These calculated, malicious, false and/or reckless attacks have had a direct effect on Mr. Reed’s, his colleagues and his family’s livelihood and he has suffered major damages through the loss of not just one, but multiple multi-million dollar sponsorship deals and his business endeavors as set forth below, as a result of the continuous harm that Defendants have inflicted and continue to inflict upon Mr. Reed with defamatory publications that are false and/or made with a reckless disregard for the truth.

22. As a direct and proximate result of the lies and defamatory statements set forth below, Mr. Reed has lost existing sponsorship deals, and has had numerous prospective sponsorship and business deals not come to fruition due to the severe damage to his reputation intentionally and maliciously caused by the Defendants.

23. As evidence of this, Mr. Reed has far fewer sponsorships now than he had prior to the Defendants’ concerted attack on his reputation, and far fewer sponsorships than other golfers who have reached his level of professional success, which is detailed above.

24. Furthermore, Mr. Reed and his wife, Justine Reed (“Mrs. Reed”), own and manage grindworksUSA, which is the domestic distributor for grindworks, a Japanese golf equipment company. The sales of grindworksUSA’s golf clubs and accessories are based on Mr. Reed’s reputation and success as one of the top professional golf players in the world. The clubs are named after Mr. Reed and his children, so consumers know that Mr. Reed is intricately connected with grindworksUSA’s clubs, their designs, and accessories. Thus, when the Defendants conspire to destroy Mr. Reed’s reputation with lies, defamatory statements and injurious falsehoods as set forth below, they are also intentionally and maliciously destroying the sales of grindworksUSA’s products.

25. Mr. Reed and Mrs. Reed also own and manage Team Reed Enterprises, Inc., which provides marketing and business services in the golf industry, including but not limited to endorsement contracts, appearance fees, operating the Team Reed Foundation and fundraising, branding and marketing, as well as logistics, business services, performance statistics, and consulting services in the golf industry. Again, since the malicious lies, defamatory statements and other illegal acts as set forth in the Complaint were made and perpetrated by Defendants, Team Reed Enterprises, Inc has suffered reputational and monetary damages accordingly.

26. Because Mr. Reed’s name and identity are so closely intertwined with grindworksUSA and Team Reed Enterprises, Inc., statements denigrating, disparaging, and defaming, and other illegal acts as pled herein concerning Mr. Reed are also necessarily statements and illegal acts of and concerning grindworksUSA and Team Reed Enterprises, Inc.’s goods and services and are maliciously designed to severely damage and harm not just Mr. Reed’s, but also the businesses he and his wife own and operate.

27. Mr. Reed has always sought to, and continues to seek to, avail himself and his businesses in Florida, which is a huge if not the top U.S. golf market for future sales and services.

**FACTS PERTAINING TO DEFENDANTS' CONCERTED ACTION**

28. Ever since rumors began about the formation of what would become LIV – as far back as 2018 - the PGA Tour, Monahan, and its associates have engaged in an ongoing pattern and practice of spreading malicious and defamatory statements of and concerning LIV and its golfers in order to try to eliminate and/or minimize LIV as a possible competitor. This was done so that PGA Tour could continue to substantially profit, to the tune of an estimated \$1.522 billion in revenue for the PGA Tour alone in 2022.<sup>2</sup>

29. In this regard, the PGA Tour has turned to its familiar “mouthpieces” – those members of the golf media who they choose to credential who have had an ongoing relationship with the PGA Tour and its partner media outlet, The Golf Channel (“Golf Channel”), and therefore a vested interest in preserving the status quo of the PGA Tour’s monopolistic hold on professional golf – to spread its malicious and defamatory statements of and concerning LIV and its golfers such as Mr. Reed.

30. The PGA Tour’s “partnership” with Golf Channel was admitted to and boasted about by Monahan in a recent appearance on none other than Golf Channel, where he referred to

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<sup>2</sup> See Mike Purkey, *The PGA Tour Is On a Spending Spree and We Know Who's Going to Get the Bill*, Sports Illustrated, Dec. 21, 2021, available at: <https://www.si.com/golf/news/the-pga-tour-is-on-a-spending-spree-and-we-know-whos-gonna-get-the-bill>

the “partnership” between the PGA Tour and Golf Channel, stating that he was “really proud of the partnership that we [the PGA Tour and the Golf Channel] share.”<sup>3</sup>

31. The PGA Tour’s defamatory pattern and practice gave rise to the *Chamblee* Case, see Comp. ¶ 2, where the PGA Tour and Golf Channel’s known “mouthpieces,” including but not limited to Brandel Chamblee, Damon Hack, Shane Bacon, and Eamon Lynch were sued for publishing malicious and defamatory statements and other illegal acts of and concerning Mr. Reed due to his decision to sign with LIV.

32. In the *Chamblee* Case, it is alleged that the Defendants there conspired to engage in a concerted plan of action to maliciously defame and commit other illegal acts concerning Mr. Reed at the direction of the PGA Tour and its foreign partner, the DP World Tour due to Mr. Reed’s decision to sign with LIV Golf. It is alleged that this concerted defamatory attack was targeted at Mr. Reed because the media has portrayed him as controversial and used him as a “lightning rod,” and the controversial face of LIV, so by attacking him, they are able to attack other golfers signed with LIV and LIV itself. The goal is to eliminate LIV and its golfers as competitors, so that the PGA Tour and DP World Tour can continue to profit in the billions of dollars per year without having to worry about an upstart league taking away their market share and media revenues. The Defendants in the *Chamblee Case* – much like the Defendants here - are all widely known mouthpieces for The Golf Channel, which again, is an admitted partner of the PGA Tour, so they are more than willing to spread false, malicious, and defamatory statements and commit other illegal acts of and concerning Mr. Reed and other LIV golfers because it serves their own interests to ensure that PGA Tour remains by far number one.

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<sup>3</sup> *Jay Monahan doesn’t expect peace between PGA Tour, LIV, Golf Channel*, Sep. 21, 2022, YouTube, available at: <https://www.youtube.com/watch?v=7wmZVDzlWRo>

33. This instant case is a continuation of the *Chamblee* Case, and is therefore related, as it involves further newly discovered false, malicious, and defamatory statements and other alleged illegal acts of and concerning Mr. Reed made by the PGA Tour’s “mouthpieces,” at the direction of the PGA Tour.

34. Indeed, many of the statements at issue in the *Chamblee* Case are republications made with actual knowledge of their falsity and/or a reckless disregard for the truth of the same false allegations of cheating and stealing first manufactured by Defendant Ryan in 2015 in Slaying the Tiger: A Year Inside the Ropes on the New PGA Tour, evidencing the concerted action alleged herein.

35. Indeed, prior to the 2015 release of Slaying the Tiger, the PGA Tour credentialed Defendant Ryan, despite him having no publisher or a real resume in order to give him complete access behind the scenes for an entire year with access to PGA Tour players, including Mr. Reed, and their families’ agents. Defendant Ryan communicated with Mr. Reed via email, portraying his upcoming book as documenting how the “young guns” of golf, including Mr. Reed, were chasing the legends of the game. Mr. Reed even sat for an interview with Defendant Ryan, where Mr. Reed was never once asked about the defamatory statements and injurious falsehoods that came to be published in Slaying the Tiger. These defamatory statements and injurious falsehoods in Slaying the Tiger by Defendant Ryan completely blindsided Mr. Reed.

36. And now, Defendant Ryan has chosen to republish these same malicious, false, and defamatory statements and injurious falsehoods of and concerning Mr. Reed in his new book—right when the LIV controversy is taking center stage. The timing here can only be explained by the fact that these new defamatory and injurious falsehood publications are being made and perpetrated in concert with the *Chamblee* Defendants, Defendant PGA, and DP World

Tour in order to try to further smear, discredit, defame, falsely injure, tortiously interfere and severely damage Mr. Reed and other LIV golfers who have signed with LIV.

37. Defendant Ryan himself is a longtime partner and collaborator with and in effect an agent of the PGA Tour and the Defendants in the *Chamblee Case*, including but not limited to Brandel Chamblee, Damon Hack, Shane Bacon, Eamon Lynch, and The Golf Channel.

38. Defendant Ryan frequently appears on the Golf Channel, often at the same time as the above Defendants in the *Chamblee Case*.

39. Defendant Ryan often travels to Ponte Vedra, Florida – the headquarters of the PGA Tour – to cover golf.

40. Defendant Ryan has recently published, The Cup They Couldn't Lose: America, The Ryder Cup, and The Long Road to Whistling Straits, (hereinafter the “Book”), where he republishes with actual malice and injurious falsehoods of many of the same false, malicious, and defamatory statements set forth in Slaying the Tiger: A Year Inside the Ropes on the New PGA Tour of and concerning Mr. Reed.

41. Similarly, Defendant Newsham is also a frequent partner and collaborator with the PGA Tour and Defendant Ryan and the Defendants in the *Chamblee Case*, including but not limited to Brandel Chamblee, Damon Hack, Shane Bacon, Eamon Lynch, and The Golf Channel.

42. Defendant Newsham has at the direction of the PGA Tour and Ryan, republished with actual malice the false, malicious, and defamatory statements and injurious falsehoods contained in the Book to a much wider audience on Fox Sports and New York Post.

43. Lastly, Defendant Ferguson – a resident of this judicial district and a citizen of Florida - has held a longstanding and continuous grudge and at all material times exhibited animus against Mr. Reed, having with actual malice, defamed and written highly skewed and

negative stories of and concerning Mr. Reed numerous times over the years under the umbrella of the Associated Press. He also chooses to repeat and republish with actual malice the same highly false and defamatory and injurious falsehood attacks initially manufactured by Defendant Ryan in 2015 in Slaying the Tiger: A Year Inside the Ropes on the New PGA Tour concerning Mr. Reed having a reputation for cheating.

44. Similar to Defendants Ryan and Newsham, Defendant Ferguson is a longtime partner, collaborator and “mouthpiece” for the PGA Tour and writes for and is on the editorial staff of Golf Channel and the Associated Press.

45. Thus, each and every defamatory statement and injurious falsehood, as well as tortious interference, as alleged herein below was and were made in concert as part of a conspiracy with the PGA Tour and Defendants in the *Chamblee* case.

46. This was all done in concert with one another and also in large part based on Mr. Reed’s decision to leave the PGA Tour and sign with LIV Golf, an upstart competitor to the PGA Tour and its joint venture partner the DP World Tour.

#### **FACTS PERTAINING TO DEFENDANTS’ DEFAMATION**

47. In retaliation for Mr. Reed’s decision to sign with LIV, Defendants, conspiring and acting in concert as joint tortfeasors with the PGA Tour and its agents, have engaged in a pattern and practice of maliciously defaming, engaging in injurious falsehoods and tortious interference of and concerning Mr. Reed, as well as LIV and other golfers who signed with LIV.

48. On information and belief, this pattern and practice of malicious defamation and other actionable wrongs as pled herein by the Defendants has been done at the behest of, and at the direction of the PGA Tour and DP World Tour, in order to try to eliminate LIV and its

golfers as competitors so that the PGA Tour and Golf Channel can continue to rake in billions of dollars in revenue.

49. It is clear that where the Defendants are making false and misleading statements regarding LIV and its players, it is reasonably understood by an objective viewer/listener that the Defendants are making these statements of and concerning Mr. Reed, as well as other golfers signed to LIV.

50. Indeed, Mr. Reed has become, not by choice but due to media-driven narrative, a “lightning rod” and therefore a frequent target of the Defendants and others in the media in order to defame, disparage and harm LIV’s other golfers and LIV as a whole.

51. The Defendants know that if they can destroy the reputation of Mr. Reed, which they themselves have inserted as the face of the “controversy” surrounding LIV, they can destroy the reputations and financial and other well-being of each and every golfer signed with LIV, just as they have for Mr. Reed for years and therefore LIV itself. This will allow them to achieve their goal of removing LIV as a competitor so that they can continue to profit obscenely.

52. Each and every one of the defamatory publications, injurious falsehoods and tortious interference set forth below were intentionally published and perpetrated by the Defendants in the state of Florida, where the offending acts were accessed, read, opened, and viewed by numerous third-party Florida residents and citizens. Florida and this district in particular are in effect the capitol of professional golf and golf in general for the United States. Its year-round warm climate, and the fact that Florida is the third largest state, with a huge media market in the golf industry, make the Sunshine State a prime target—if not ground zero—for Defendants’ defamatory and other illegal acts in their effort to destroy Mr. Reed, other LIV players and LIV in general. Not coincidentally, LIV’s U.S. headquarters is located in Florida at

222 Lakeview Avenue, West Palm Beach, FL 33401, and its CEO, Greg Norman also resides in Florida. Indeed, the last LIV tournament for 2022 took place at Trump National in Doral, Florida, between October 28-30, 2022, and a myriad of PGA Tour events also take place in this district and Florida in general. Thus, the PGA Tour and LIV are going head-to-head in the Sunshine State. Many more events are scheduled for and will take place in Florida in 2023.

53. In sum, each and every one the Defendants have engaged in “continuous and systematic” activities in Florida, as they are all members of golf media. Florida is considered to be the golf capital of the United States if not the world. Furthermore, as this Complaint alleges the Defendants were conspiring with and acting in concert with and at the direction of the PGA Tour, their “continuous and systematic” contacts with Florida are even more evident given that the PGA Tour is headquartered in Ponte Vedra, Florida, in this judicial district.

54. As set forth above, Defendants Ryan, Newsham, and Ferguson are regularly in Florida, and specifically this judicial district where the PGA Tour is headquartered, to provide media coverage for golf events being held in the Ponte Vedra area and elsewhere in Florida.

55. Defendants Hachette, Fox Sports, New York Post, and AP heavily circulate their golf media and do substantial business in Florida, and specifically this judicial district. They have deliberately exploited this judicial district, since it is one of the golf capitals of the United States and the world, and where the PGA Tour headquarters is located.

56. In sum, each of the Defendants do substantial business in Florida and derive significant revenues from their business in Florida, as it is the third largest media market in the United States and which may soon overtake other media markets giving Florida’s rapid population growth and good economic and social conditions, including but not limited to a lack

of a state personal income tax and other benefits for individuals and businesses that most other states do not offer.

**Ryan and Hachette**

57. Ryan has engaged in a longstanding and continuous pattern and practice of maliciously defaming, falsely injuring and tortiously interfering with Mr. Reed, the latest of which occurred in Ryan's new book, The Cup They Couldn't Lose: America, The Ryder Cup, and The Long Road to Whistling Straits, (hereinafter the "Book") which was published by Hachette. This book was initially published on May 10, 2022.

58. In the Book, Ryan makes numerous malicious, false, and defamatory statements and injurious falsehoods of and concerning Mr. Reed.

59. Ryan and Hachette acted with, at a minimum, a reckless disregard for the truth, since they consciously and willfully chose not to speak with any witnesses who could have and would have refuted the false, malicious, and defamatory statements below, including but not limited to Mr. Reed's college coaches, his college teammates, and PGA Tour officials involved in the "incidents" set forth below.

60. The defamation and injurious falsehoods maliciously commence with the title of Chapter 1 itself, which reads "December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed." It is telling and of great legal significance that the first chapter of the book takes aim at Mr. Reed, who then becomes the focus of more smears, lies and innuendo.

61. This chapter—taken as a whole, including the plainly defamatory title—is defamatory, and at a bare minimum, defamatory by implication.

62. *First*, Ryan writes, “[Mr. Reed had] been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he’d been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.”

63. This statement is false, malicious, and defamatory and falsely injurious on its face because it falsely states that Mr. Reed cheated during his NCAA playing career. Mr. Reed has provided public statements by his coaches – who would have been privy to any cheating accusations – that they were unaware of any cheating accusations against Mr. Reed and importantly that he did not cheat.

64. *Second*, Ryan writes, “When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he’s doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague statements from his coaches, and generally took the path of full denial. The end result was that Reed’s teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.

65. This statement is false, malicious, defamatory and injuriously false because it once again published the falsity that Mr. Reed cheated during his NCAA playing career. Mr. Reed has provided public statements by his coaches – who would have been privy to any cheating accusations – that they were unaware of any cheating accusations against Mr. Reed.

66. It is significant and most telling that Mr. Reed - as a young freshman in college was taking the place of All-American juniors and seniors in qualifying events every single week on the University of Georgia Golf Team- which was the best in the country at that time. Those players didn't like a freshman taking their spots - it embarrassed them, angered them, and in the end - Patrick ended beating all of them in his second team triumph to go back-to-back NCAA Championships, so these group of guys had every reason to get rid of Patrick on the team, and that is what they did.

67. *Third*, Ryan wrote **“Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review.”**

68. This statement is false, malicious, defamatory and injuriously false because it baselessly accuses Mr. Reed of intentionally cheating during the 2019 Hero World Challenge in the Bahamas. What the taped video of this matter showed, at worst, was an unintentional error by Mr. Reed and he was not even in a sand trap but a waste area instead, which the PGA Tour also believed to be the case as evidenced by the fact the Mr. Reed was only assessed a two-stroke penalty and not disqualified from the tournament. Thus, there was never any finding of misconduct or cheating.

69. Furthermore, even the statement that the waste area looked indistinguishable from a sand trap is highly misleading to the public. It implies that Mr. Reed committed a rules infraction in a waste bunker that was “indistinguishable” from a bunker. Professional players know the difference, especially at that specific course- in the Bahamas - the waste areas and bunkers are well known. The players all know difference between a waste bunker (which is a penalty area) and a normal bunker.

70. *Fourth*, Ryan wrote **“Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.”**

71. This statement is false, malicious, defamatory and injuriously false because it baselessly accuses Mr. Reed of intentionally cheating in 2015. This is completely false. It is telling that Mr. Ryan provides his readers with absolutely no specifics as to this alleged cheating incident in 2015, likely to try to hide the fact that this is just a false, malicious, and defamatory targeted attack on Mr. Reed’s reputation, both professional and personal.

72. *Fifth*, Ryan wrote, **“Chamblee went so far as to say that when Tiger added Reed to the team, he “made a deal with the devil.” By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren’t running – with silence, putting their own integrity on the line.”**

73. This statement is false, malicious, defamatory and injuriously false because it baselessly accuses Mr. Reed of intentionally cheating during the 2019 Hero World Challenge in the Bahamas. This is completely false. It further questions the integrity of Mr. Reed, and falsely claims that Mr. Reed forced his teammates to put their own integrity on the line, which is a false exaggeration. Mr. Reed never forced his teammates to say anything, nor could he. They are all adults capable of making their own decisions and saying what they want to say.

74. *Sixth*, Ryan wrote, **“It figured that the first time anyone on Reed’s team had been honest and open with the media, it would be a caddie admitting he’d shoved a fan.”**

75. This statement is false, malicious, defamatory and injuriously false because it published the falsity that Mr. Reed had lied to the media in the past. This is false. It also creates the implication that Mr. Reed’s wife, agents, lawyers, coaches, and anyone associated with Mr. Reed also tells lies and is dishonest.

76. Each and every one of published statements were made with actual malice since they were false and/or made with a reckless disregard for the truth. And, given Ryan’s and his publisher’s demonstrable animus toward and against Mr. Reed, the falsities set forth above also amount to both constitutional and common law malice, as Ryan clearly has a pathological and sick fixation to lie and publish false defamatory statements and injurious falsehoods in his quest to try to destroy Mr. Reed, his wife, his children and family, in order to sell books for profit.

***New York Post, Fox Sports, and Gavin Newsham***

77. Gavin Newsham wrote and published in this judicial district an article that contained false, malicious, and defamatory statements of and concerning Mr. Reed using Ryan and Hachette’s defamatory Book as a credited source (the “Newsham Article”). On September 18, 2022, the Newsham Article was published by Fox Sports under the title, *“Don’t know they’d*

*p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain<sup>4</sup>*” and on September 17, 2022, this same article was published by the New York Post under the title, “*The scandalous truth about Patrick Reed, the bad boy of golf*”.<sup>5</sup> These articles are identical except for the titles.

78. Ryan and Hachette are conspiring and working in concert together with Newsham, Fox Sports, and New York Post as joint tortfeasors in order to further and republish the lies contained in the Book, in order to try to drive sales of the Book.

79. Newsham, New York Post, and Fox Sports acted with, at a minimum, a reckless disregard for the truth, since he consciously and willfully chose not to speak with any witnesses who could have and would have refuted the false, malicious, and defamatory statements below, including but not limited to Mr. Reed’s college coaches, his college teammates, and PGA Tour officials involved in the “incidents” set forth below.

80. Indeed, the two titles given to the Newsham Article defeat any possible assertion that they are “opinion,” as both purport to offer the “truth” about Mr. Reed, and therefore are unequivocally making statements of fact –albeit false – of and concerning Mr. Reed.

81. First, Newsham writes, “Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — **and how he solved the perennial problem of Patrick Reed.**”

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<sup>4</sup> Gavin Newsham, *‘Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain*, Sep. 18, 2022, Fox Sports, available at: <https://www.foxsports.com.au/golf/dont-know-they-p-on-him-if-he-was-on-fire-the-scandalous-truth-of-golfs-biggest-villain/news-story/e7c3b7dd1a5b3d0bbdb0758ccc3960f9>

<sup>5</sup> Gavin Newsham, *The scandalous truth about Patrick Reed, the bad boy of golf*, Sep. 17, 2022, New York Post, available at: <https://nypost.com/2022/09/17/the-scandalous-truth-about-patrick-reed-the-bad-boy-of-golf/>

82. This statement is false, malicious, and defamatory because it accuses Mr. Reed of being a “problem” as part of the U.S. Ryder Cup team. Nothing can be farther from the truth. Mr. Reed simply showed up and played with his teammates and never caused any issues.

83. Second, Newsham writes, **“When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.”**

84. This statement is false, malicious and defamatory because it falsely accuses Mr. Reed and/or implies that Mr. Reed stole from his teammates. This has never been any accusation that this occurred and Mr. Reed never stole from his teammates.

85. Third, Newsham writes, **“During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.”**

86. This statement is false, malicious, and defamatory because it once again published the falsity that Mr. Reed cheated during his NCAA playing career. Mr. Reed has provided public statements by his coaches – who would have been privy to any cheating accusations – that they were unaware of any cheating accusations against Mr. Reed.

87. It is also significant and telling that Mr. Reed - as a young freshman in college was taking the place of All-American juniors and seniors in qualifying events every single week on the University of Georgia Golf Team- which was the best in the country at that time. Those players didn't like a freshman taking their spots - it embarrassed them, angered them, and in the

end - Patrick ended beating all of them in his second team triumph to go back-to-back NCAA Championships, so these group of guys had every reason to get rid of Patrick on the team, and that is what they did.

88. *Fourth*, Newsham writes **“Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.”**

89. This statement is false, malicious, and defamatory because it accuses Mr. Reed of being “the devil,” and specifically, Newsham, lends credence to this assertion by saying, “he was right.” Mr. Reed simply plays golf. Tiger Woods selecting Mr. Reed for the 2019 Presidents Cup match was not making a “deal with the devil.” This creates and reinforces the false implication that Mr. Reed is evil, a terrible human being, a cheater, and a thief. All of this is entirely untrue and highly defamatory.

90. *Fifth* Newsham writes, **“At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

91. This statement is false, malicious, and defamatory because it accuses Mr. Reed of intentionally cheating at the Hero World Classic, which simply did not happen. It was a simple error, and Mr. Reed was only penalized two strokes and not disqualified, which is obviously what would have happened if he had been found to have intentionally cheated. Newsham also repeats Ryan’s defamatory statements about Mr. Reed being “the devil,” which is completely “out of pocket” and defamatory as set forth above.

92. *Sixth*, Newsham writes “**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.”**

93. This statement is false, malicious, and defamatory because it creates the implication that Mr. Reed was solely responsible for causing the U.S. team to not gel, creating petty feuds and egos, and overall being a locker room disruption. This is completely false and misleading and highly damaging to Mr. Reed’s trade and profession as a professional golfer.

**Defendant Ferguson and AP**

94. On or about February 2, 2021, Defendant Ferguson published an article on AP titled Column: Reed’s reputation from Bahamas the ultimate penalty.”<sup>6</sup> (the “Ferguson Article”).

95. The Ferguson Article taken as a whole is completely defamatory, and at a bare minimum defamatory by implication. The entire purpose of the Article is to plant in the reader’s mind that, despite there being absolutely no evidence of cheating, that Mr. Reed is a habitual cheater who has earned a reputation for cheating and who has gotten away with cheating. Specifically, the false, malicious, and defamatory statements include but are hardly limited to:

96. *First*, Defendant Ferguson wrote:

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: “Whoa! What was THAT?”**

**It was Patrick Reed.**

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<sup>6</sup> Doug Ferguson, *Column: Reed’s reputation from Bahamas the ultimate penalty*, Feb. 2, 2021, AP, available at: <https://apnews.com/article/sports-bahamas-patrick-reed-golf-rickie-fowler-8d0fa7ed6f764ddf3195e23e005c53a4>

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

97. This statement is false, malicious, defamatory and an injurious falsehood because it falsely accuses Mr. Reed of being a cheater and having earned a reputation for cheating through his actions. This is completely untrue and baseless. Mr. Reed has never been found to have cheated by anyone.

98. *Second*, Defendant Ferguson wrote: “[m]oving past this one will be almost impossible.”

99. This statement is false, malicious, defamatory and an injurious falsehood because, similar to the above statement, falsely accuses Mr. Reed of being a cheater and having earned a reputation for cheating through his actions, and particularly that his reputation for cheating will always follow Mr. Reed. This is completely untrue and baseless. Mr. Reed has never been found to have cheated by anyone.

100. *Third*, Defendant Ferguson wrote:

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

**He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept**

**probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds.**

**“I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.**

**Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.**

**Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.**

**Free drop.**

101. This statement is false, malicious, defamatory and an injurious falsehood because it creates the false implication that Mr. Reed had somehow gotten away with cheating, despite the fact that Mr. Reed had been completely cleared of any wrongdoing by the PGA. It is included tactically by Ferguson to lend support to the baseless allegations of cheating above.

102. As a direct proximate result of the defamation and injurious falsehoods set forth above, Defendants, have maliciously caused a hostile workplace environment for Mr. Reed, spilling over to his family. This hostile workplace, which has been made to occur in the tournaments and events which Mr. Reed attends and participates in to earn a living for himself and his family, has been manifested, only in part, by induced personal attacks on him and his family by persons attending these tournaments and events. These induced personal attacks have in turn harmed his performance at tournaments and events, despite his excellent record, which record would be even much greater without the disruption and emotional distress caused by these personal attacks.

103. These induced and continuing personal attacks include, but are not limited to: “Now on the tee the excavator!,” “You suck!,” “You f..... ing suck!,” “You jackass!,” “You coward!,” “Shovel!,” “Why don’t you dig a grave and bury yourself in it!,” “You piece of shit!,” “No one likes you!,” “Everyone hates you Reed!,” “Good luck digging yourself out of this one!,”

“Where are your parents coward?!,” “You cheater!,” “Cheat!,” “Everyone hates you cheater!,” “You’re going to miss this you cheater!,” “You cheat in college and on tour and you’re a piece of shit!,” “Beat the cheater’s ass!,” “Sorry Webb for having to play with the cheat! Who did you piss off?!,” “Why don’t you introduce your children to their grandparents you ungrateful bitch?!” This is just a sampling of what Defendants maliciously and intentionally caused and furthered with actual malice. These personal attacks occur frequently while Mr. Reed is actively preparing to make his golf shot, or during the golf shot, much less thereafter as he is walking to his next golf shot, as well as lining up and making putts on the green, which putts require a high degree of concentration

104. Pursuant to Fla. Stat. § 770.01, the undersigned counsel has demanded correction or retraction from the Defendants at least five (5) days to the filing of this Complaint, and Defendants have refused to do so, further ratifying and condoning the defamatory statements set forth herein.

## **VI. CAUSES OF ACTION**

### **FIRST CAUSE OF ACTION**

#### ***Defamation Defendant Ryan***

105. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

106. Defendant Ryan, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

107. These statements include but are not limited to:

He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.

When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.

Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review."

Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.

Chamblee went so far as to say that when Tiger added Reed to the team, he "made a deal with the devil." By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren't running – with silence, putting their own integrity on the line.

It figured that the first time anyone on Reed's team had been honest and open with the media, it would be a caddie admitting he'd shoved a fan.

December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed.

108. Defendant Ryan's defamatory publications are not privileged in any way or manner.

109. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

110. Defendant Ryan knew or had reason to know that the publications were false and misleading.

111. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**SECOND CAUSE OF ACTION**

***Defamation by Implication***

***Defendant Ryan***

112. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

113. Defendant Ryan, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.**

**When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague**

statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.

Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review."

Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.

Chamblee went so far as to say that when Tiger added Reed to the team, he "made a deal with the devil." By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren't running – with silence, putting their own integrity on the line.

It figured that the first time anyone on Reed's team had been honest and open with the media, it would be a caddie admitting he'd shoved a fan.

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115. Defendant Ryan's defamatory publications are not privileged in any way or manner.

116. Defendant Ryan, conspiring to act together with his co-Defendant, in concert as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

117. Defendant Ryan, conspiring to act together with his co-Defendant as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

118. A reasonable person would understand Defendant Ryan's statements to impart the false innuendo, which would be highly offensive to a reasonable person.

119. Defendant Ryan, conspiring to act together with his co-Defendant as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

120. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**THIRD CAUSE OF ACTION**

***Defamation Per Se***  
***Defendant Ryan***

121. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

122. Defendant Ryan, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost**

immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.

When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.

Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review."

Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.

Chamblee went so far as to say that when Tiger added Reed to the team, he "made a deal with the devil." By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren't running – with silence, putting their own integrity on the line.

It figured that the first time anyone on Reed's team had been honest and open with the media, it would be a caddie admitting he'd shoved a fan.

**December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed.**

124. Defendant Ryan's defamatory publications are not privileged in any way or manner.

125. The false, defamatory and misleading nature of Defendant Ryan's publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

126. The false, defamatory and misleading publications were made with actual malice.

127. Defendant Ryan knew or had reason to know that the publications were false and misleading.

128. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer and personally.

#### **FOURTH CAUSE OF ACTION**

##### ***Defamation Defendant Hachette***

129. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

130. Defendant Hachette, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.**

**When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague**

statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.

Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review."

Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.

Chamblee went so far as to say that when Tiger added Reed to the team, he "made a deal with the devil." By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren't running – with silence, putting their own integrity on the line.

It figured that the first time anyone on Reed's team had been honest and open with the media, it would be a caddie admitting he'd shoved a fan.

**December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed.**

132. Defendant Hachette's defamatory publications are not privileged in any way or manner.

133. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

134. Defendant Hachette knew or had reason to know that the publications were false and misleading.

135. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**FIFTH CAUSE OF ACTION**  
***Defamation by Implication***  
***Defendant Hachette***

136. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

137. Defendant Hachette, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.**

**When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.**

**Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera**

**caught him red-handed, and Golf.com’s Dylan Dethier, on the scene, heard Rickie Fowler say, I don’t even know what you have to review.”**

**Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.**

**Chamblee went so far as to say that when Tiger added Reed to the team, he “made a deal with the devil.” By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren’t running – with silence, putting their own integrity on the line.**

**It figured that the first time anyone on Reed’s team had been honest and open with the media, it would be a caddie admitting he’d shoved a fan.**

**December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed.**

139. Defendant Hachette’s defamatory publications are not privileged in any way or manner.

140. Defendant Hachette, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

141. Defendant Hachette, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

142. A reasonable person would understand Defendant Hachette’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

143. Defendant Hachette, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

144. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**SIXTH CAUSE OF ACTION**

***Defamation Per Se***  
***Defendant Hachette***

145. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

146. Defendant Hachette, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.**

**When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.**

**Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review."**

**Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.**

**Chamblee went so far as to say that when Tiger added Reed to the team, he "made a deal with the devil." By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren't running – with silence, putting their own integrity on the line.**

**It figured that the first time anyone on Reed's team had been honest and open with the media, it would be a caddie admitting he'd shoved a fan.**

**December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed.**

148. Defendant Hachette's defamatory publications are not privileged in any way or manner.

149. The false, defamatory and misleading nature of Defendant Hachette's publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer

150. The false, defamatory and misleading publications were made with actual malice.

151. Defendant Hachette knew or had reason to know that the publications were false and misleading.

152. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**SEVENTH CAUSE OF ACTION**

***Defamation***

***Defendant Fox Sports***

153. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

154. Defendant Fox Sports, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with**

the devil is useful only if the devil can give you something important in exchange....”

Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.

**Don't know they'd p\*\*\* [piss] on him if he was on fire': The scandalous truth of golf's biggest villain**

156. Defendant Fox Sports' defamatory publications are not privileged in any way or manner.

157. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

158. Defendant Fox Sports knew or had reason to know that the publications were false and misleading.

159. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**EIGHTH CAUSE OF ACTION**  
***Defamation by Implication***  
***Defendant Fox Sports***

160. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

161. Defendant Fox Sports, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.**

163. Defendant Fox Sports’ defamatory publications are not privileged in any way or manner.

164. Defendant Fox Sports, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

165. Defendant Fox Sports, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

166. A reasonable person would understand Defendant Fox Sports' statements to impart the false innuendo, which would be highly offensive to a reasonable person.

167. Defendant Fox Sports conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

168. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**NINTH CAUSE OF ACTION**  
***Defamation Per Se***  
***Defendant Fox Sports***

169. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

170. Defendant Fox Sports, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.**

172. Defendant Fox Sports’ defamatory publications are not privileged in any way or manner.

173. The false, defamatory and misleading nature of Defendant Fox Sports' publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer

174. The false, defamatory and misleading publications were made with actual malice.

175. Defendant Fox Sports knew or had reason to know that the publications were false and misleading.

176. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**TENTH CAUSE OF ACTION**

***Defamation***

***Defendant New York Post***

177. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

178. Defendant New York Post, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing.**

**It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**The scandalous truth about Patrick Reed, the bad boy of golf.**

180. Defendant New York Post’s defamatory publications are not privileged in any way or manner.

181. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

182. Defendant New York Post knew or had reason to know that the publications were false and misleading.

183. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**ELEVENTH CAUSE OF ACTION**  
***Defamation by Implication***  
***Defendant New York Post***

184. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

185. Defendant New York Post, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanize a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it**

**showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**The scandalous truth about Patrick Reed, the bad boy of golf.**

187. Defendant New York Post’s defamatory publications are not privileged in any way or manner.

188. Defendant New York Post, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

189. Defendant New York Post, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

190. A reasonable person would understand Defendant New York Post’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

191. Defendant New York Post, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

192. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**TWELFTH CAUSE OF ACTION**

***Defamation Per Se***  
***Defendant New York Post***

193. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

194. Defendant New York Post, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it**

**showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**The scandalous truth about Patrick Reed, the bad boy of golf.**

196. Defendant New York Post’s defamatory publications are not privileged in any way or manner.

197. The false, defamatory and misleading nature of Defendant New York Post’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer

198. The false, defamatory and misleading publications were made with actual malice.

199. Defendant New York Post knew or had reason to know that the publications were false and misleading.

200. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**THIRTEENTH CAUSE OF ACTION**

***Defamation  
Defendant Newsham***

201. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

202. Defendant Newsham, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of**

beating their European counterparts — and how he solved the perennial problem of Patrick Reed.

When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.

During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.

Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.

At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”

Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.

**Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.**

**The scandalous truth about Patrick Reed, the bad boy of golf.**

204. Defendant Newsham’s defamatory publications are not privileged in any way or manner.

205. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

206. Defendant Newsham knew or had reason to know that the publications were false and misleading.

207. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**FOURTEENTH CAUSE OF ACTION**  
***Defamation by Implication***  
***Defendant Newsham***

208. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

209. Defendant Newsham, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.**

**The scandalous truth about Patrick Reed, the bad boy of golf.**

211. Defendant Newsham’s defamatory publications are not privileged in any way or manner.

212. Defendant Newsham, conspiring and acting together with his co-Defendants as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

213. Defendant Newsham, conspiring and acting together with his co-Defendants as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

214. A reasonable person would understand Defendant Newsham’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

215. Defendant Newsham, conspiring and acting together with his co-Defendants as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory

inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

216. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**FIFTEENTH CAUSE OF ACTION**

***Defamation Per Se***  
***Defendant Newsham***

217. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

218. Defendant Newsham, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.**

**The scandalous truth about Patrick Reed, the bad boy of golf.**

220. Defendant Newsham’s defamatory publications are not privileged in any way or manner.

221. The false, defamatory and misleading nature of Defendant Newsham’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer

222. The false, defamatory and misleading publications were made with actual malice.

223. Defendant Newsham knew or had reason to know that the publications were false and misleading.

224. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**SIXTEENTH CAUSE OF ACTION**

***Injurious Falsehoods***

***Defendant Ryan***

225. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

226. Defendant Ryan, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

**He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.**

**When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.**

**Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review."**

**Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.**

**Chamblee went so far as to say that when Tiger added Reed to the team, he "made a deal with the devil." By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious**

**violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren't running – with silence, putting their own integrity on the line.**

**It figured that the first time anyone on Reed's team had been honest and open with the media, it would be a caddie admitting he'd shoved a fan.  
December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed.**

227. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

228. Defendant Ryan knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

229. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

**SEVENTEENTH CAUSE OF ACTION**

***Injurious Falsehoods  
Defendant Hachette***

230. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

231. Defendant Hachette, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

He'd been kicked out of Georgia after a year for two alcohol violations, the second of which he tried to hide from his coach, and before that he'd been accused by his teammates of cheating during a qualifying event. Then he went to Augusta State, where he turned the entire team against him almost immediately, and once again he was accused of cheating, this time by shaving strikes in two straight qualifying events. His teammates held a meeting and voted to kick him off the team, but Augusta State coach Josh Gregory reduced it to a two-match suspension.

When the ugly details came out, Reed set to work blundering his way into deeper trouble, which was the start of a PR strategy that he's doggedly stuck to ever since. He went on Golf Channel, produced a couple of vague statements from his coaches, and generally took the path of full denial. The end result was that Reed's teammates, who had previously been silent came out of the woodwork to crucify him further, confirming old details and adding new ones.

Reed found himself in a waste area that looked indistinguishable from a sand trap. The rules, though, are different: in the waste area, a player is allowed to ground his club. Which is exactly what Reed did, but then he proceeded to drag the club backward, sweeping away the sand in front of his ball. Then he resettled the club and did it again. This is blatantly illegal, and nothing about it was ambiguous. Reed had improved his lie by clearing the path to his ball, and when the first effort wasn't satisfactory, he did it again. The TV camera caught him red-handed, and Golf.com's Dylan Dethier, on the scene, heard Rickie Fowler say, I don't even know what you have to review."

Reed was assessed a two-stroke penalty when the round was over, but the bigger problem was the hit to his reputation. Before long, someone dug up a clip of him doing the same exact thing at a 2015 tournament, and for a guy whose credibility was already in the mud, who had been accused of cheating in the past, it was like throwing gas on the flames. He was skewered.

Chamblee went so far as to say that when Tiger added Reed to the team, he "made a deal with the devil." By forcing the Americans to defend him. Reed put them in an impossible situation and forced them to greet an obvious violation – one that would have horrified most of them to commit, in a sport where players frequently call penalties on themselves even when the camera aren't running – with silence, putting their own integrity on the line.

It figured that the first time anyone on Reed's team had been honest and open with the media, it would be a caddie admitting he'd shoved a fan.

December 2019, Melbourne, Australia, Fires Down Under ... The Greatest Escape...The End of the Legend of Patrick Reed.

232. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

233. Defendant Hachette knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

234. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

**EIGHTEENTH CAUSE OF ACTION**

***Injurious Falsehoods***

***Defendant Fox Sports***

235. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

236. Defendant Fox Sports, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.**

237. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

238. Defendant Fox Sports knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed’s line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

239. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

**NINETEENTH CAUSE OF ACTION**

***Injurious Falsehoods***  
***Defendant New York Post***

240. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

241. Defendant New York Post, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with**

the devil is useful only if the devil can give you something important in exchange....”

Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.

Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.

242. These falsehoods were published widely to third parties in this judicial district, nationwide, and world wide.

243. Defendant New York Post knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed’s line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

244. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

**TWENTIETH CAUSE OF ACTION**

***Injurious Falsehoods  
Defendant Newsham***

245. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

246. Defendant Newsham, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

**Detailing the long history of the Ryder Cup, Ryan explains how 2020 US captain Steve Stricker managed to galvanise a team so often incapable of beating their European counterparts — and how he solved the perennial problem of Patrick Reed.**

**When items including a watch, a putter and \$400 went missing from the locker room, teammates suspected it was Reed who had taken them, especially as he turned up the following day with a large wad of cash.**

**During one qualifying round, Reed hit his ball into the rough but when they found it, it was, miraculously, closer to the fairway. Convinced he was cheating, Reed was challenged by his teammates but denied any wrongdoing. It was a similar story when Reed attended Augusta State. This time, he stood accused of shaving strokes off his scorecards and while his teammates voted to kick him off the team, his coach reduced the sanction to a two-match suspension.**

**Golf analyst Brandel Chamblee, meanwhile, suggested that in picking Reed, Woods had ‘made a deal with the devil.’ He was right.**

**At the Hero World Classic in the Bahamas prior to the Presidents Cup, Reed was spotted trying to improve the lie of his ball, not once but twice. Reed blamed it on the angle of the TV cameras making it look worse than it was but he was still penalised two strokes. As Ryan writes: “Making a deal with the devil is useful only if the devil can give you something important in exchange....”**

**Free from the trouble that followed Reed around like a puppy, the US team jelled like never before, coasting to a record win over Europe, winning 19-9. Petty feuds were forgotten, egos left at the locker room door and any chance of disruption had been eradicated. Finally, the US players were a team, not just a dozen millionaire golfers thrown together. And, as Ryan writes, it showed “what happens when American power is no longer stifled by mismanagement, but elevated and ultimately unleashed by a superb captaincy.**

**Don’t know they’d p\*\*\* [piss] on him if he was on fire’: The scandalous truth of golf’s biggest villain.**

247. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

248. Defendant Newsham knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

249. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

**TWENTY-FIRST CAUSE OF ACTION**

***Tortious Interference***

***Defendant Ryan***

250. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

251. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

252. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

253. Defendant Ryan knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and

sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

254. Defendants willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

255. As a direct and proximate result of the Defendants' actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

**TWENTY-SECOND CAUSE OF ACTION**

***Tortious Interference***

***Defendant Hachette***

256. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

257. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

258. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

259. Defendant Hachette knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and

sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

260. Defendant Hachette willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

261. As a direct and proximate result of the Defendant Hachette's actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

**TWENTY-THIRD CAUSE OF ACTION**

***Tortious Interference***

***Defendant Fox Sports***

262. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

263. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

264. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

265. Defendant Fox Sports knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and

sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

266. Defendant Fox Sports willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

267. As a direct and proximate result of the Defendant Fox Sports actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

**THIRTY-FOURTH CAUSE OF ACTION**

*Tortious Interference*  
*Defendant New York Post*

268. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

269. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

270. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

271. Defendant New York Post knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed

and sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

272. Defendant New York Post willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

273. As a direct and proximate result of the Defendant New York Post's actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

**TWENTY-FIFTH CAUSE OF ACTION**

*Tortious Interference*

*Defendant Newsham*

274. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

275. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

276. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

277. Defendant Newsham knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and

sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

278. Defendant Newsham willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

279. As a direct and proximate result of the Defendant Newsham's actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

**TWENTY-SIXTH OF ACTION**

***Defamation***

***Defendant Ferguson***

280. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

281. Defendant Ferguson, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

282. These statements include but are not limited to:

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: "Whoa! What was THAT?"**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

**He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds. “I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.**

**Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.**

**Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.**

**Free drop.**

283. Defendant Ferguson’s defamatory publications are not privileged in any way or manner.

284. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

285. Defendant Ferguson knew or had reason to know that the publications were false and misleading.

286. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**TWENTY- SEVENTH CAUSE OF ACTION**

***Defamation by Implication***

***Defendant Ferguson***

287. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

288. Defendant Ferguson, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: “Whoa! What was THAT?”**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

**He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds.**

**“I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.**

**Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.**

**Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.**

**Free drop.**

290. Defendant Ferguson’s defamatory publications are not privileged in any way or manner.

291. Defendant Ferguson, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

292. Defendant Ferguson, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

293. A reasonable person would understand Defendant Ferguson’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

294. Defendant Ferguson, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

295. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**TWENTH-EIGHTH CAUSE OF ACTION**

***Defamation Per Se***  
***Defendant Ferguson***

296. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

297. Defendant Ferguson, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: “Whoa! What was THAT?”**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds.

“I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.

Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.

Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.

**Free drop.**

299. Defendant Ferguson’s defamatory publications are not privileged in any way or manner.

300. The false, defamatory and misleading nature of Defendant Ferguson’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

301. The false, defamatory and misleading publications were made with actual malice.

302. Defendant Ferguson knew or had reason to know that the publications were false and misleading.

303. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer and personally.

**TWENTY-NINTH CAUSE OF ACTION**

***Injurious Falsehoods***  
***Defendant Ferguson***

304. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

305. Defendant Ferguson, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: “Whoa! What was THAT?”**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

**He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds.**

**“I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.**

**Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.**

**Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.**

**Free drop.**

306. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

307. Defendant Ferguson knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

308. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

**THIRTIETH CAUSE OF ACTION**

*Tortious Interference*

*Defendant Ferguson*

309. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

310. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

311. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

312. Defendant Ferguson knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and

sponsors, as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

313. Defendant Ferguson willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

314. As a direct and proximate result of the Defendant Ferguson's actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

**THIRTY-FIRST CAUSE OF ACTION**

***Defamation  
Defendant AP***

315. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

316. Defendant AP, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

317. These statements include but are not limited to:

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: "Whoa! What was THAT?"**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

**He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds. “I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.**

**Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.**

**Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.**

**Free drop.**

318. Defendant AP’s defamatory publications are not privileged in any way or manner.

319. The false, defamatory and misleading publications about Mr. Reed were widely published and the falsity of the statements caused injury to Mr. Reed.

320. Defendant AP knew or had reason to know that the publications were false and misleading.

321. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**THIRTY-SECOND CAUSE OF ACTION**

***Defamation by Implication***

***Defendant AP***

322. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

323. Defendant AP, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: “Whoa! What was THAT?”**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

**He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds.**

**“I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.**

**Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.**

**Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.**

**Free drop.**

325. Defendant AP’s defamatory publications are not privileged in any way or manner.

326. Defendant AP, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, published false statements about Mr. Reed and these statements were defamatory in that they created a false impression of Mr. Reed.

327. Defendant AP, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, juxtaposed a series of facts so as to imply a defamatory connection between them or, in the alternative, created a defamatory implication by omitting facts when describing the nature and sequence of events.

328. A reasonable person would understand Defendant AP’s statements to impart the false innuendo, which would be highly offensive to a reasonable person.

329. Defendant AP, conspiring and acting together with its co-Defendants as joint tortfeasors, jointly and severally, and individually, intended or endorsed the defamatory inferences that the published statements created and these false, defamatory and misleading statements were made with actual malice.

330. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer, and personally.

**THIRTY-THIRD CAUSE OF ACTION**

*Defamation Per Se*

*Defendant AP*

331. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

332. Defendant AP, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has defamed Mr. Reed by knowingly, intentionally, willfully, recklessly, grossly negligently, and/or negligently publishing statements about the Plaintiff which they knew or should have known to be false and misleading.

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

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: “Whoa! What was THAT?”**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds.

“I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.

Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.

Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.

**Free drop.**

334. Defendant AP’s defamatory publications are not privileged in any way or manner.

335. The false, defamatory and misleading nature of Defendant AP’s publications subjected Plaintiff to ridicule, hatred, disgust and contempt in his trade and profession as a professional golfer.

336. The false, defamatory and misleading publications were made with actual malice.

337. Defendant AP knew or had reason to know that the publications were false and misleading.

338. These false, malicious, and defamatory statements have caused irreparable harm to Mr. Reed, his reputation and his trade and profession as a professional golfer and personally.

**THIRTY-FOURTH CAUSE OF ACTION**

***Injurious Falsehoods***

***Defendant AP***

339. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

340. Defendant AP, conspiring and acting together in concert with his co-Defendants as joint tortfeasors, jointly and severally, and individually, has published numerous falsehoods of and concerning Mr. Reed, including but not limited to:

**The violation was so egregious that Rickie Fowler, glancing at the replay on television, quickly raised his eyebrows and said: “Whoa! What was THAT?”**

**It was Patrick Reed.**

**This was just over a year ago in the Bahamas, the day Reed infamously used the back of his wedge to scoop away sand — twice — from behind his golf ball in a waste bunker, improving his line of play. Only when he was shown video evidence did Reed accept the two-shot penalty, but not before suggesting the camera angle made it look worse than it was.**

**The penalty, as it turns out, was worth more than two shots.**

**There is no greater punishment in golf than being stuck with a reputation for cheating.**

**“[m]oving past this one will be almost impossible.”**

**He pulled his approach from a fairway bunker into thick grass left of the 10th green. Approaching where a volunteer had marked the spot with a tiny flag, Reed asked if the ball bounced. “No, I didn’t see it bounce,” the volunteer replied.**

**He turned to his playing partners, PGA Tour rookie Will Gordon and second-year player Robby Shelton, and told them, “They said it didn’t bounce,” and that he would check for an embedded lie. Crouching over, he marked the spot with a tee, put the ball in the palm of his hand and kept probing the turf for about 5 seconds when he called for an official. And then he poked around for another five seconds.**

**“I believe it broke ground, but I’m going to let you make that call,” Reed told Brad Fabel, the rules official.**

**Fabel didn’t immediately know what he was talking about because Reed had placed the ball about 8 feet away.**

**Reed showed him where the ball was, Fabel poked around and agreed there was a “lip,” meaning the ball had broken the plane of the soil.**

**Free drop.**

341. These falsehoods were published widely to third parties in this judicial district, nationwide, and worldwide.

342. Defendant AP knew that these falsehoods would more than likely cause Mr. Reed to suffer pecuniary harm in the form of his current sponsors dropping him and a significant decrease in the amount of new sponsorship opportunities that Mr. Reed would be presented with, as well as pecuniary harm to Mr. Reed's line of golf clubs, grindworksUSA, and his golf services corporation, Team Reed.

343. These falsehoods played a material and substantial part in Mr. Reed actually losing sponsorships, not receiving new sponsorship opportunities at the same rate prior to these falsehoods being published, as well as a decrease in the sales and other damage to his line of golf clubs, grindworksUSA and his golf services corporation, Team Reed.

**THIRTY-FIFTH CAUSE OF ACTION**  
*Tortious Interference*  
*Defendant AP*

344. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

345. Mr. Reed had ongoing contractual relationships with sponsors whereby Mr. Reed was to promote his sponsor's goods in exchange for financial benefit, as well as prospective contractual relationships with sponsors.

346. Mr. Reed had ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

347. Defendant AP knew of the ongoing business relationships between Mr. Reed and his sponsors as well as the prospective contractual relationships between Mr. Reed and sponsors,

as well as ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc.

348. Defendant AP willfully and intentionally and vindictively interfered with these ongoing business relationships and prospective business relationships and/or contracts by spreading lies of and concerning Mr. Reed in order to destroy his reputation, and to induce sponsors to break their contractual relationships with Mr. Reed.

349. As a direct and proximate result of the Defendant AP's actions, Mr. Reed has had his ongoing contractual relationships with his sponsors terminated, and his prospective contractual relationships with sponsors never came to fruition, and ongoing and prospective contractual relationships through both grindworksUSA and Team Reed Enterprises, Inc. terminated due to this intentional and unjustifiable interference by the Defendants.

**THIRTY-SIXTH CAUSE OF ACTION**

***Civil Conspiracy***

***Defendant Ryan***

350. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

351. Defendant Ryan, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

352. Defendant Ryan, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of

the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

353. Defendant Ryan, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

354. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

**THIRTY-SEVENTH CAUSE OF ACTION**

*Civil Conspiracy*  
*Defendant Hachette*

355. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

356. Defendant Hachette, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

357. Defendant Hachette, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

358. Defendant Hachette, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

359. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

**THIRTY-EIGHTH CAUSE OF ACTION**

*Civil Conspiracy*  
*Defendant Fox Sports*

360. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

361. Defendant Fox Sports conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his

ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

362. Defendant Fox Sports conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

363. Defendant Fox Sports conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

364. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

**THIRTY-NINTH CAUSE OF ACTION**

***Civil Conspiracy***

***Defendant New York Post***

365. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

366. Defendant New York Post conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by

maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

367. Defendant New York Post conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

368. Defendant New York Post conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

369. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

**FORTIETH CAUSE OF ACTION**  
*Civil Conspiracy*  
*Defendant Newsham*

370. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

371. Defendant Newsham, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to

and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

372. Defendant Newsham, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

373. Defendant Newsham, conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

374. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

**FORTY-FIRST CAUSE OF ACTION**

*Civil Conspiracy*  
*Defendant Ferguson*

375. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

376. Defendant Ferguson conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

377. Defendant Ferguson conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

378. Defendant Ferguson conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

379. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

**FORTY-SECOND CAUSE OF ACTION**

***Civil Conspiracy***

***Defendant AP***

380. Mr. Reed hereby reincorporates and realleges the factual allegations set forth above.

381. Defendant AP conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, have agreed to and in fact sought to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

382. Defendant AP conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour, had a meeting of the minds on the plan to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

383. Defendant AP conspiring and acting together in concert with the other Defendants as joint tortfeasors, along with the PGA Tour and DP World Tour have taken numerous overt steps towards trying to eliminate Mr. Reed, LIV, and other golfers signed to LIV as competitors by maliciously defaming them and smearing their reputations in golf, and personally, tortiously interfering with his ongoing and prospective contractual relationships, and publishing injurious falsehoods of and concerning Mr. Reed's goods and services.

384. Mr. Reed has suffered severe damages as a direct and proximate result of this conspiracy.

## **VII. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for relief and judgment against each Defendant, jointly and severally, as joint tortfeasors as follows:

(a) For general (non-economic), special (economic), actual and compensatory damages in an amount to be determined by the jury in an amount in excess of \$250,000,000.00 U.S. dollars, as well as injunctive relief;

(b) For consequential damages in a sum reasonable to a jury;

(c) For punitive damages in an amount to be determined by the jury to punish and impress upon Defendants the seriousness of their conduct and to deter similar conduct in the future;

(d) For attorneys' fees, expenses and costs of this action, and;

(e) For such further relief as this Court deems necessary, just and proper.

**DEMAND FOR TRIAL BY JURY**

Plaintiff Patrick Nathaniel Reed demands a trial by jury on all counts as to all issues so triable.

**Dated:** November 1, 2022

Respectfully submitted,

*/s/ Larry Klayman, Esq.*  
Larry Klayman, Esq.  
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*Counsel for Plaintiff*