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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION**

PAUL BONDAR,)

Plaintiff,)

v.)

NEXSTAR MEDIA GROUP, INC.,)

GANNETT CO., INC., AMERICANS 4)

SECURITY, INC., and ABC NEWS,)

INC.)

Defendants.)

Case No.: 2024L010583

COMPLAINT

NOW COMES the Plaintiff, Paul Bondar (“Plaintiff”) by and through his attorneys, Brown, Udell, Pomerantz & Delrahim, Ltd., and for his Complaint against the Defendants Nexstar Media Group, Inc. (“Nexstar”), Gannett Co. Inc. (“Gannett”), Americans 4 Security, Inc. (“Americans 4 Security”) and ABC News, Inc. (“ABC” and collectively with Nexstar, Gannett, and Americans 4 Security, “Defendants”), states as follows:

INTRODUCTION

1. This is an action against the Defendants for defamation, invasion of privacy-false light, and tortious interference arising out of Defendants’ outrageous, false, and defamatory statements regarding Plaintiff, which false and defamatory statements severely negatively impacted Plaintiff’s political campaign to represent Oklahoma’s Fourth Congressional District in the United States House of Representatives, as well as Plaintiff’s business interests. Indeed, Defendants’ false and defamatory statements included claims that Plaintiff has ties to Vladimir Putin, and that Plaintiff was not a resident of Oklahoma (which claim, if true, would have

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disqualified him as a candidate). As a result of these false and defamatory statements, Plaintiff lost his primary election, lost approximately \$6,000,000.00 that he personally invested in his political campaign, and suffered substantial reputational damages, in addition to other damages

PARTIES AND JURISDICTION

2. Plaintiff is an Oklahoma resident who owns property and a home in the state of Illinois and does significant business in the State of Illinois.

3. On information and belief, Defendant Nexstar is a Texas corporation that does business in the state of Illinois.

4. On information and belief, Defendant Gannett is a Delaware corporation that does business in the state of Illinois.

5. On information and belief, Defendant Americans 4 Security is a Wisconsin corporation that does business in the state of Illinois.

6. On information and belief, Defendant ABC is a Delaware corporation that does business in the state of Illinois.

7. Venue is proper in this Court pursuant to Section 2-101 of the Illinois Code of Civil Procedure as this county in which some part of Plaintiff's cause of action arose or occurred.

GENERAL ALLEGATIONS

8. Plaintiff is an experienced and successful businessman, having founded Illinois based Bondar Insurance Group, Inc. ("Bondar Insurance"), an insurance company specializing in providing insurance to the trucking industry. Plaintiff built Bondar Insurance and served as its President for 13 years.

9. In 2021, before the launch of his political campaign, Plaintiff entered into an agreement to sell Bondar Insurance to a third-party buyer, Alera Group, and under said agreement, continues to serve as its Managing Partner.

10. In 2024, Plaintiff declared as a candidate for the Republican party's nomination to represent Oklahoma's Fourth Congressional District in the United States House of Representatives.

11. During the course of Plaintiff's campaign, Defendants published numerous false and defamatory statements regarding Plaintiff, including, but not limited to:

- a. On or about May 11, 2024 KFOR News ("KFOR"), owned by Defendant Nexstar and based in Oklahoma City, OK, falsely reported that it was unable to confirm if Plaintiff was an Oklahoma resident, and repeated US Rep. Tom Cole's false statement that "***Bondar doesn't live in Oklahoma at all,***"
- b. On or about May 20, 2024, Defendant Nexstar, which is the owner of Chicago-based WGN-TV, likewise falsely reported that it was unable to confirm if Plaintiff was an Oklahoma resident.
- c. On or about June 7, 2024, the Oklahoman, owned by Defendant Gannett and based in Oklahoma City, Oklahoma, published a story in which it falsely stated "***Texan seeking Rep. Cole's seat leasing condo owned by Russian singer tied to Putin, records show***" and "***A condominium leased by the Texas millionaire trying to unseat Rep. Tom Cole is owned by the family of a Russian pop star with ties to Russian President Vladimir Putin, documents obtained The Oklahoman show,***" amongst other false statements. (A true and

correct copy of the Oklahoman's June 7, 2024 article is attached hereto as Exhibit A.)

- d. Similarly, on June 18, 2024, ABC, a national news organization, published a story in which it falsely repeated allegations of ***"ties between Bondar and people connected to Russian President Vladimir Putin"***.
- e. Finally, in or about May-June 2024, Defendant Americans 4 Security nationally published commercials/ads repeating the false claims that Plaintiff owned no property in Oklahoma and had ties to Vladimir Putin. (See attached screen shot from video aired online, attached hereto as Exhibit B.)

(collectively, the "Defamatory Statements").

12. The Defamatory Statements are false, as Plaintiff is indeed a resident of Oklahoma, and has never had any ties to Vladimir Putin.

13. As a result of the Defamatory Statements, Plaintiff suffered significant harm, including the loss of approximately \$6,000,000.00 that he personally invested in his political campaign, which culminated in a second place finish in the June 18, 2024 Oklahoma Republican Party primary.

14. Further, as a result of WGN-TV's reporting regarding Plaintiff as well as Defendant Americans 4 Security's commercials, Alera threatened to terminate its relationship with Plaintiff and to rescind a portion of the prior sale because of the false and negative media reporting and the resulting public relations fallout and effect on Alera's stock price. Plaintiff suffered severe mental and emotional distress as a result of the same, as well as damage to his business reputation, and Plaintiff's business relationship with Alera was significantly damaged as a result of the Defamatory Statements.

COUNT I
DEFAMATION PER SE

15. Plaintiff repeats and realleges paragraphs 1 through 14 as and for his paragraph 15 herein.

16. Defendants made false and defamatory statements regarding Plaintiff to the public at large, in form of the Defamatory Statements.

17. The Defamatory Statements made by the Defendants were directly related to Plaintiff's business.

18. The Defamatory Statements made by the Defendants were unprivileged statements that were made, upon information and belief, with malice and with the intent to harm Plaintiff's reputation.

19. Defendants' Defamatory Statements concerned Plaintiff's business and called into question his reputation and trustworthiness within his professional community.

20. As a direct and proximate result of the foregoing, Plaintiff has suffered excessive monetary damages as well as damage to his reputation.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment against Defendants Nexstar, Gannett, Americans 4 Security and ABC, awarding:

- A. Compensatory, presumed, and punitive damages to Plaintiff, in an amount in excess of \$10,000,000.00, resulting from Defendants' defamatory statements and actions;
- B. Costs to Plaintiff, in an amount to be proven at trial; and
- C. Such other and further relief this Court may deem just and equitable.

COUNT II

DEFAMATION

21. Plaintiff repeats and realleges paragraphs 1 through 14 as and for his paragraph 21 herein.

22. Defendants made false and defamatory statements regarding Plaintiff to the public at large, in form of the Defamatory Statements.

23. The Defamatory Statements made by the Defendants were directly related to Plaintiff's business.

24. The Defamatory Statements made by the Defendants were unprivileged statements that were made, upon information and belief, with malice and with the intent to harm Plaintiff's reputation.

25. As a direct and proximate result of the foregoing, Plaintiff has suffered excessive monetary damages as well as damage to their reputations.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment against Defendants Nexstar, Gannett, Americans 4 Security, and ABC, awarding:

- A. Compensatory and punitive damages to Plaintiff, in an amount in excess of \$10,000,000.00, resulting from Defendants' defamatory statements and actions;
- B. Costs to Plaintiff, in an amount to be proven at trial; and
- C. Such other and further relief this Court may deem just and equitable.

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

26. Plaintiff repeats and realleges paragraphs 1 through 14 of the General Allegations as and for his paragraph 26 herein.

27. Defendants' Defamatory Statements placed Plaintiff in a false light before the public.

28. Upon information and belief, the false light placed upon Plaintiff by the Defendants would be highly offensive to a reasonable person.

29. Upon information and belief, the Defendants acted with actual malice in placing Plaintiff in a false light before the public.

30. Defendants knew or should have known that making such statements to the public at large would cause any recipient of the Defamatory Statements to view Plaintiffs in a false light.

31. As a direct and proximate result of the foregoing, Plaintiff has suffered excessive monetary damages as well as damage to their reputations.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment against Defendants Nexstar, Gannett, Americans 4 Security and ABC, awarding:

- A. Compensatory and punitive damages to Plaintiff, in an amount in excess of \$10,000,000.00;
- B. Costs to Plaintiff, in an amount to be proven at trial; and
- C. Such other and further relief this Court may deem just and equitable.

COUNT IV
TORTIOUS INTERFERENCE PROSPECTIVE ECONOMIC ADVANTAGE
(Against Defendant Americans 4 Security)

32. Plaintiff repeats and realleges paragraphs 1 through 14 of the General Allegations as and for his paragraph 32 herein.

33. Plaintiff and Alera had an existing valid business relationship after the sale of Bondar Insurance, with the parties agreeing that Plaintiff would continue to serve as Bondar Insurance's Managing Partner.

34. Defendant Americans 4 Security was aware of Plaintiff's relationship with Alera.

35. In 2024, Defendant Americans 4 Security ran a series of ads and commercials which, among other things, targeted Plaintiff's relationship with Alera.

36. As a result of the actions of Americans 4 Security, and the underlying Defamatory Statements, Plaintiff's relationship with Alera was significantly damaged.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter judgment against Defendant Americans 4 Security awarding:

- A. Compensatory damages to Plaintiff, in an amount in excess of \$10,000,000.00;
- B. Costs to Plaintiff, in an amount to be proven at trial; and
- C. Such other and further relief this Court may deem just and equitable.

Respectfully submitted,

PAUL BONDAR

By: /s/ Glenn M. Kanter
One of his attorneys

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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in Plaintiff's Complaint are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Paul Bondar

EXHIBIT A

GOVERNMENT

Texan seeking Rep. Cole's seat leasing condo owned by Russian singer tied to Putin, records show



M. Scott Carter

The Oklahoman

Published 6:02 a.m. CT June 7, 2024 | Updated 6:02 a.m. CT June 7, 2024



A condominium leased by the Texas millionaire trying to unseat Rep. Tom Cole is owned by the family of a Russian pop star with ties to Russian President Vladimir Putin, documents obtained The Oklahoman show. The revelation comes at the same time many right-wing Republicans are criticizing Cole for his support of the Ukrainian government's effort to fight the Russian invasion.

Information on the Bondar Insurance Group's website lists an office in Hallandale Beach, Florida, at 1945 S Ocean Drive, unit 12. That condo is leased by Paul Bondar and his wife, Jennifer. Bondar is the Texas millionaire seeking to unseat Cole.

Records from the Broward County appraiser's office show the Florida condo is owned by Muza Marin Inc. The company's registered agent is Lioudmila Issakovitch. Issakovitch and her husband, Valerii Leontiev, are Russian pop stars with close ties to Putin.

Bondar's campaign said Bondar has no connection with Issakovitch or Leontiev. "There is no business connection," campaign spokeswoman Lisa Liebl said. "Mr. and Mrs. Bondar have no business connection with, nor even heard of, the individuals from Russia. They don't know these people."

Liebl said the business partner of Bondar's who used the Florida location has since moved out of the condo and into a different place. She said the Bondars have a contractor/business partner in a development project, which is 1212 Atlantic Properties LLC.

"The business partner leased (lives and works) from 1945 S Ocean Drive, hence why that is the address listed for the LLC. However, they lease an office space in the same building, which is the No. C12 listed on their website," Liebl said. "The contractor no longer lives in unit No. 1212 and moved to another unit last year."

Leontiev has received numerous awards from Putin

Lioudmila Issakovitch and Valerii Leontiev, whose first names are often spelled differently, recently received the Order of Friendship from Russian President Putin. Leontiev has received multiple awards from Putin including the Order of the Fatherland in 2022.

In 2020, the New York Daily News reported that Leontiev — which the paper described as "a shaggy-haired Russian pop crooner" — once sang a duet with Putin and is one of the few recipients of the Kremlin's highest civilian honor. Leontiev performed at a Trump-branded property in Florida on New Year's Eve in 2020.

Bondar's campaign mostly self-financed

Bondar's television advertising has criticized Cole for supporting Ukraine in its fight against Russia. "Congressman Tom Cole has voted to send more than \$160 billion to Ukraine. Paul Bondar opposes new Ukraine spending and wants to spend the money to seal the southern border," Bondar's television ad said.

Bondar has launched a largely self-financed campaign against Cole. While Federal Election Commission records show Bondar only raising about \$30,000 for first reporting period, other FEC and Federal Communication Commission records show that Bondar is spending more than \$3.3 million on television advertising in the Oklahoma City; Ada; and Wichita Falls, Texas, media markets.

Bondar told the political news service Roll Call that even if he was defeated in this race, he would be back.

"Regardless of this outcome, I am going to run a reelection campaign in 2026," Bondar said in the Roll Call interview. "Tom is 75 years old. I think people are going to quickly understand that, at some point, either really soon or not too far off, I will be the next congressman of this district, based on my level of commitment to this state."

Cole, unlike others in his party, has been a staunch backer of sustaining military aid for Ukraine and has long supported Ukrainian efforts to stop the Russian army.

Cole: Primary like a bar fight

Cole told Roll Call, the primary was similar "to an old-fashioned bar fight."

"The guy who wins a bar fight isn't the guy with the most money, it's the guy with the most friends. And I have a lot of friends in that district," Cole told Roll Call.

Bondar, echoing the GOP's far-right wing, has opposed aid to Ukraine, saying the money should be spent on more border security.

Florida records show the property is the home to myriad business and limited liability corporations.

For example, Jennifer Bondar is registered as the manager of 1212 Atlantic Properties LLC, which lists its principal address as 1945 S. Ocean Dr. Unit No. 1212 Hallandale Beach, FL 33009. 1212 Atlantic Properties LLC was formed in 2022.

In addition, there are at least six other limited liability corporations registered at the same address as Bondar Insurance Group and 1212 Atlantic Properties.

Bondar, a self-described patriot and family man from Texas, announced that he was seeking the nomination for Oklahoma's 4th Congressional District seat earlier this year. Bondar said he now lives in Oklahoma. Bondar, who grew up in Wisconsin, spent his adult life in Illinois. He owned the Bondar Insurance Group in Oak Brook, Illinois, and moved to Texas in 2020.

Records show that Bondar holds a Texas driver's license and voted as recently as March 5 in a Texas election. His transition to Oklahoma has been quick and seems to parallel to the 2024 election cycle.

Bondar was not listed as a registered voter in Oklahoma until April 3. His Oklahoma voter registration is listed in Pontotoc County. On April 4, Bondar filed a Declaration of Candidacy with the Oklahoma Election Board, listing the

state's 4th Congressional District seat. One day later, on April 5, Bondar was issued an Oklahoma driver's license.

EXHIBIT B



BONDAR DOESN'T OWN *ANYTHING* IN OKLAHOMA

RIGHT NOW

CLINTON



56°

OKLAHOMA CITY



72°

ENID



62°

6:27 | 72°



TRAFFIC

I-35 SB FROM 2ND ST IN EDMOND TO KILPATRICK TURNPIKE

3 MIN