

October 15, 2012

Ha



Hulk Hogan
@HulkHogan

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Now my actions will speak louder than my words. HH

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8:49 AM - 15 Oct 2012



liam gillett @scousewrestling

15 Oct 2012

@HulkHogan yet to watch bound for glory with me being a brit but wednesday sitting right in front of the telly and watching it

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Joey Phee@JoeyPhee

15 Oct 2012

@HulkHogan u got that right terry- u left ur real hulkamaniacs (the less fortunate kind) behind and now they will leave u behind becuz of it

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~PStar~ @PStarFreder2010

15 Oct 2012

@HulkHogan yeah saw ur vid clip smh if u were videotaped against your knowledge fully seek prosecution to extent of the law

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Joey Phee@JoeyPhee

15 Oct 2012

@HulkHogan the reason y ur fans will leave u behind is becuz u left the Truth Team (OBAMA/BIDEN) they stand up & fight for what's right

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Ande Parks@andeparks

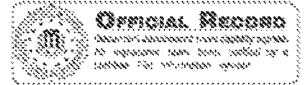
15 Oct 2012

@HulkHogan Rock on, brother! Keep your dick out of all your friend's wives!

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Don't miss any updates from Hulk Hogan

UNCLASSIFIED



FEDERAL BUREAU OF INVESTIGATION

Electronic Communication

Title: (U) Opening EC

Date: 10/16/2012

From: TAMPA

TP-PRA

Contact: Jason R. Shearn, [REDACTED]

Approved By: SSRA [REDACTED]

Drafted By: Jason R. Shearn

b6 -1
b7C -1
b7E -2

Case ID #: 9B-TP-2534791

(U) KEITH DAVIDSON;
TERRY BOLLEA (VICTIM);
EXTORTION - ALL OTHER NONAGGRAVATED
THREATS

Synopsis: (U) [REDACTED]
attorney Keith Davidson.

Details:

On October 3, 2012 Gawker Media released a one minute video on their website of a sex tape involving Terry Bollea (aka Hulk Hogan) and Heather Clem, former wife of local radio station host Todd Clem (aka Bubba The Love Sponge). During multiple media appearances, Bollea denied knowledge of the original filming of the sex tapes and further denied consent to be filmed. Gawker Media has contested that Bollea has no reasonable expectation of privacy, refused to remove the video from their website and has refused to comply with a cease and desist letter. Further, the website TMZ reported that they transcribed the tape and Todd Clem, on camera, is heard saying words to the effect that if he ever wanted to retire, he had his retirement fund (referring to the sex tape).

On October 15, 2012, after contacting local law enforcement, Bollea and his attorney David Houston made an in-person complaint at the Tampa Division Pinellas Resident Agency (PRA). Bollea denied any

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GAWKER-1

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Title: (U) Opening EC
Re: 9B-TP-2534791, 10/16/2012

knowledge of the tapes as well as denied providing consent to Todd or Heather Clem to tape him during the sex act.

Houston advised PRA Agents that Attorney Keith Davidson, from Beverly Hills, CA initially contacted him on several occasions between October 10, 2012 through October 12, 2012. During these conversations and e-mail exchanges, Davidson stated that he represents the possessor of additional sex tapes involving Bollea and Heather Clem. Davidson further stated that he was willing to negotiate a price for Bollea to purchase the copyrights of the tapes. Additionally, Davidson stated that Bollea used racial epithets in one of the tapes and, if released, would damage Bollea's career.

When questioned by PRA Agents, Bollea stated he had sexual intercourse with Clem approximately three to four times but did not know he was being filmed and did not consent to the filming.

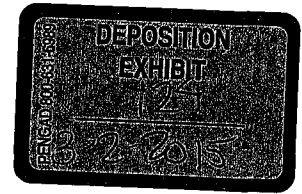
On October 16, 2012 AUSA Sara Sweeney concurred with opening an extortion investigation into this incident. As such, it is requested that Tampa Division open a 9B Extortion investigation. This matter will be assigned to Case Agent SA Jason Shearn and Co-case Agent SA

b6 -1
b7C -1

[REDACTED]

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Terry Bollea (Hulk Hogan) files two civil lawsuits in regards to release of tape

For immediate release

October 15, 2012 – Tampa, Florida

Terry Gene Bollea professionally known as “Hulk Hogan,” filed two lawsuits today in Tampa, Florida in connection with the recording of Mr. Bollea, without his knowledge or consent, engaged in private consensual intimate relations in a private bedroom. The video was posted on the Internet earlier this month.

The first lawsuit, filed in the Florida State Court for Pinellas County, is against Heather Clem aka Heather Cole and her ex-husband, Bubba the Love Sponge Clem aka Todd Alan Clem. It alleges claims of invasion of privacy, public disclosure of private facts, intentional and negligent infliction of emotional distress, and violation of the Florida statute prohibiting the taping of another person without their knowledge. According to the allegations in the Complaint, the Clems created the videotape of Mr. Bollea approximately six years ago, without his knowledge or consent, and has been demanding the removal and destruction of the videotape since he learned of its existence.

The second lawsuit was filed in the United States District Court for the Middle District of Florida against Gawker Media, its owner Nick Denton, and affiliated entities and individuals. According to the Complaint, such entities and persons were involved in posting excerpts of the video at their website and refused to remove them after Mr. Bollea’s legal counsel sent cease and desist demands for their removal and destruction.

The lawsuit against Gawker Media, Denton and their affiliates seeks **\$100 million** in monetary damages, plus punitive damages, a temporary restraining order, and a preliminary and permanent injunction to force Gawker Media to remove all content of the video from their websites. That complaint alleges claims for invasion of privacy, public disclosure of private facts, common law violation of right of publicity, intentional infliction of emotional distress, and negligent infliction of emotional distress.

“The invasion of privacy that occurred is illegal, outrageous, and exceeds the bounds of human decency,” stated Mr. Bollea’s lead litigation counsel, Charles J. Harder of Wolf Rifkin Shapiro Schulman & Rabkin LLP in Los Angeles. “We will see these lawsuits through to a successful conclusion, and will not stop until all persons involved in these

TRAUB 0031

Dep124-001

egregious violations of Mr. Bollea's privacy rights have been prosecuted to the fullest extent of the law."

Mr. Bollea's personal litigation attorney, David R. Houston of Reno, Nevada, added: "There is a criminal aspect to this case as well. We believe that crimes were committed by those who secretly created and publicly broadcast this tape, and we will ensure that all crimes are prosecuted to the fullest extent of the law."

Mr. Bollea stated: "I am fortunate to have a supportive family during this process, and look forward to prevailing in court."

For further information, please contact:

Elizabeth Rosenthal Traub, Publicist, EJ Media Group LLC, New York, NY, elizabeth@ejmediagroup.com, Tel. 212-518-4771, x105.

Charles J. Harder, Esq., Wolf Rifkin Shapiro Schulman & Rabkin LLP, Los Angeles, California, www.WRSlawyers.com, Tel. 310-478-4100.

David R. Houston, Reno, Nevada, www.DavidHoustonLaw.com, Tel. 775-786-4188.

TRAUB 0032

Dep124-002

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

12 OCT 15 PM 3:42
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

TERRY GENE BOLLEA professionally
known as HULK HOGAN,

Plaintiff,

v.

GAWKER MEDIA, LLC aka GAWKER
MEDIA; GAWKER MEDIA GROUP, INC.
aka GAWKER MEDIA; GAWKER
ENTERTAINMENT, LLC; GAWKER
TECHNOLOGY, LLC; GAWKER SALES,
LLC; NICK DENTON; A.J. DAULERIO;
KATE BENNERT, BLOGWIRE HUNGARY
SZELLEMI ALKOTAST HASZNOSITO
KFT aka GAWKER MEDIA

Defendants.

Case No. 8:12CV2348-27TBM

**COMPLAINT AND DEMAND FOR
JURY TRIAL WITH INJUNCTIVE RELIEF SOUGHT**

Plaintiff Terry Gene Bollea (“Plaintiff” or “Bollea”), professionally known as “Hulk Hogan,” sues defendants Gawker Media, LLC aka Gawker Media, Gawker Media Group, Inc. aka Gawker Media, Gawker Entertainment, LLC, Gawker Technology, LLC, Gawker Sales, LLC, Nick Denton, A.J. Daulerio, Kate Bennert, Blogwire Hungary Szellemi Alkotast Hasznosito KFT aka Gawker Media (collectively, “Defendants”) and alleges as follows:

TDA-13727
#350

PRAYER FOR RELIEF

WHEREFORE, plaintiff Terry Gene Bollea prays for judgment against defendants Gawker Media, LLC aka Gawker Media; Gawker Media Group, Inc. aka Gawker Media; Gawker Entertainment, LLC; Gawker Technology, LLC; Gawker Sales, LLC; Nick Denton; A.J. Daulerio; Kate Bennert, Blogwire Hungary Szellemi Alkotast Hasznosito KFT aka Gawker Media, and each of them, jointly and severally, as follows:

AS TO THE FIRST THROUGH FOURTH CAUSES OF ACTION

1. For an award of general and special damages in an amount not less than One Hundred Million Dollars (\$100,000,000.00), together with interest thereon at the maximum legal rate;

2. For exemplary and punitive damages in an amount appropriate to punish and set an example of Defendants, and to deter such conduct in the future, the exact amount of such damages is subject to proof at trial;

AS TO ALL CAUSES OF ACTION

3. For a preliminary and permanent injunction against Defendants, and all persons acting on their behalf or under their control, from any and all activity that would cause or have the effect of distributing, disseminating, publishing, displaying, posting for view or access on or through the Internet or any other manner or media outlet, broadcasting, transferring, licensing, selling, offering to sell or license, or otherwise using, exploiting or attempting to exploit, the Video or any portions or content thereof or any copies thereof,

including without limitation the Video Excerpts, in any and all formats and media, including all electronic and physical media;

4. For a Judgment and Order transferring to Plaintiff any and all of Defendants' right, title and interest in and to the Video, and all portions and content thereof, including without limitation the Video Excerpts,;

5. For a Judgment and Order requiring the delivery to Plaintiff all copies of the Video, and all portions and content thereof, including without limitation the Video Excerpts, in all formats and all forms of media, including electronic and physical media, within Defendants' possession, custody or control, including without limitation turning over to Plaintiff any and all storage devices (such as CDs, DVDs, hard drives, flash drives, tapes, and disks) containing same;

6. For a Judgment and Order requiring Defendants to turn over to Plaintiff all information pertaining to the Video and Video Excerpts, including without limitation, all activity by all persons and entities related to the creation, storage, transportation, editing, distributing, disseminating, publishing, displaying, posting for view or access on or through the Internet or any other manner or media outlet, broadcasting, transferring, licensing, selling, offering to sell or license, or otherwise using, exploiting or attempting to exploit, the Video or any portions or content thereof or any copies thereof, including without limitation the Video Excerpts, in any and all formats and media, including all electronic and physical media.

7. For a constructive trust to be placed upon Defendants and all persons acting on their behalf or under their direction or control, as to all revenues and profits received by

any such individuals, including Defendants, to be held for the benefit of Plaintiff, and to be disgorged in their entirety to Plaintiff.

8. For such other and further relief as to this court may deem and proper.

DEMAND FOR JURY TRIAL

Pursuant to Fed.R.Civ.P. Rule 38 and the Seventh Amendment to the United States Constitution, plaintiff Terry Gene Bollea hereby demands a trial by jury on all issues so triable.

DATED: October 15, 2012

Respectfully Submitted,


/s/ E. Colin Thompson

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Attorneys for Plaintiff

DATED: October 15, 2012

/s/ Charles J. Harder

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DATED: October 15, 2012

/s/ David R. Houston

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Hulk Hogan press conference

Reality TV star and former pro wrestler Hulk Hogan is suing a Tampa Bay-based disc jockey, the DJ's ex-wife and a New York media group over a sex tape

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Investigating charity claims



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Hulk Hogan Press Conference, WTSP.com, October 15, 2012

REGINALD ROUNDTREE: And we've got some breaking news in the Hulk Hogan sex-tape case that's going on. Hulk Hogan has filed a lawsuit against his friend Bubba the Love Sponge. But Bubba's estranged wife; and Gawker, the Internet site, the blog that released the sex tape – "10 News" reporter Tammie Fields is covering Hillsborough County from the courthouse this afternoon where Hulk and his lawyers are talking about the suits. Let's listen in to the press conference now.

CHARLES HARDER: (In progress) – that he had never consented to any aspect of that video. And after he and his legal counsel demanded repeatedly that Gawker remove that video from its website, Gawker refused to do so. And it continued to post that video. The acts of Gawker Media are illegal, outrageous and exceed the bounds of human decency. The lawsuit against Gawker seeks damages in the amount of \$100 million.

The two lawsuits also seek an order transferring all rights to that video to Mr. Hogan and compelling all copies, all excerpts, all content to be delivered to Mr. Hogan's legal counsel so that it can be destroyed. The actions of the defendants cannot be tolerated by a civil society. Hulk Hogan will take all reasonable steps necessary to ensure that all persons and entities who were involved in this are punished to the fullest extent of the law.

I'm now going to turn this over to attorney David Houston, who has some additional remarks.

DAVID HOUSTON: Good afternoon, everybody. My name is David Houston, and thank you for being here.

I have been Hulk Hogan's personal litigation counsel for a little over five years. As a consequence I've come to know Hulk very well. He is not someone that is going to allow himself to be victimized without taking the opportunity to exercise every possible angle as it concerns law enforcement to stop the individuals who have set upon this path of what I consider to be a sincere invasion of his privacy and an attempt to destroy his life.

The civil lawsuits filed today are the first step. We are also investigating criminal prosecution both on the state level and on the federal level as it concerns those individuals responsible not only for the creation of this video but as well its dissemination. And for those people that may be out there, we had issued a warning initially that we would come for you if you published this video.

And I'm hopeful today it sends the message very clearly to any other entities out there that might be considering posting all or part of this video or for that matter any other – (inaudible) – we will – (inaudible) –

MR. ROUNDTREE: You're looking at a live press conference in front of the Hillsborough County Courthouse, attorney Houston who represents Hulk Hogan in this sex-tape scandal. Hulk is suing Bubba the Love Sponge and his ex-wife and the Gawker blog for releasing the sex tape. We will get back to this. This is breaking news that's going on. We'll get back to this because we believe that Hulk Hogan may also make a statement during this press conference. We'll come back to it when we see that Hulk is talking.