CONFIDENTIAL LEGAL COMMUNICATION NOT FOR PUBLICATION.

Julian Assange has published the largest leaks in the history of the CIA, State Department, Pentagon, the U.S. Democratic Party, and the government of Saudi Arabia, among many others, as well as saving Edward Snowden from arrest. Predictably, numerous falsehoods have been subsequently spread about WikiLeaks and its publisher.

Falsehoods have also been spread by third parties: media competitors, click-bait sites, political party loyalists, and by those linked to the governments WikiLeaks or Julian Assange are litigating or have litigated (U.K., U.S., Ecuador, Sweden), which seek his arrest (U.S., U.K.), expulsion (Ecuador), or who have formal criminal investigations (U.S., Saudi Arabia, Australia), or who have banned or censored WikiLeaks (Saudi Arabia, Turkey, China).

Since Mr. Assange's unlawful isolation and gagging on March 28, 2018, the publication of false and defamatory claims about him has accelerated, perhaps because of an incorrect view that Mr. Assange, due to his grave personal circumstances, can no longer defend his reputation.

These defamation efforts have reached a new nadir with the recent front page fabrication by Guardian newspaper, which falsely claimed that Julian Assange had multiple secret meetings with Trump campaign manager Paul Manafort, right down to a made up description of latter's pants at the fabricated meetings ("sandy coloured chinos") [see <a href="https://theintercept.com/2019/01/02/five-weeks-after-the-guardians-viral-blockbuster-assangemanafort-scoop-no-evidence-has-emerged-just-stonewalling/].

It is clear that there is a pervasive climate of inaccurate claims about WikiLeaks and Julian Assange, including purposeful fabrications planted in otherwise 'reputable' media outlets. In several instances these fabrications appear to have the intent of creating political cover for his censorship, isolation, expulsion, arrest, extradition and imprisonment.

Mr. Assange's isolation, ongoing proceedings and pending extradition also increase the legal and ethical burden on journalists, publishers and others to get their facts straight. Consequently journalists and publishers have a clear responsibility to carefully fact-check from primary sources and to consult the following list of defamations to ensure they do not spread and have not spread falsehoods about WikiLeaks or Julian Assange. The purpose of this list is to aid the honest and accurate and to put the dishonest and inaccurate on notice.

Defamation List v1.3 the absense of any claim from this list does not imply that the claim is not false or defamatory

It is false and defamatory to suggest that Julian Assange is, or has ever been, charged with an offence by the United Kingdom or Sweden [see https://defend.wikileaks.org/about-julian/].

It is false and defamatory to suggest that Julian Assange is, or has ever been, an agent or officer of any intelligence service [see https://defend.wikileaks.org/].

It is false and defamatory to suggest that WikiLeaks is, or has ever been alleged by the U.S. government to be, a State "foreign intelligence service".

It is false and defamatory to suggest that WikiLeaks or Julian Assange has ever been contacted by the Mueller investigation.

It is false and defamatory to suggest that there is any evidence that the U.S. charges against Julian Assange relate to the Mueller investigation.

It is false and defamatory to suggest that Julian Assange or Wikileaks is, or has ever been alleged by the U.S. government to be: Russian, Russian owned, a Russian subsidiary, contracted by Russia, Russian staffed, based in Russia, "in league" with Russia, an "arm of Russia" or a "Russian cutout" [see <u>https://</u> <u>defend.wikileaks.org/</u>].

It is false and defamatory to suggest that the U.S. government claims that Julian Assange or WikiLeaks directed, conspired, colluded or otherwise engaged in a crime, to obtain information from the Democratic National Committee or John Podesta [in fact, the government has made no such claim].

It is false and defamatory to suggest that the Democratic National Committee has claimed that Julian Assange directed, conspired, or colluded to hack the Democratic National Committee or John Podesta [in fact, the DNC makes no such claim: <u>https://</u> <u>www.courthousenews.com/wp-content/uploads/2018/12/</u> <u>WikiLeaksDNC.pdf</u>].

It is false and defamatory to suggest that WikiLeaks was alone in publishing allegedly hacked Democratic Party materials in 2016 [in fact, most U.S. media organizations did so: Politico, the Hill, The Intercept, Facebook, Wordpress and Twitter, and every major press outlet, including CNN and the New York Times, republished, see <u>https://www.courthousenews.com/wp-content/</u> uploads/2018/12/WikiLeaksDNC.pdf].

It is false and defamatory to suggest that Julian Assange has ever met or communicated with Paul Manafort [see <a href="https://theintercept.com/2019/01/02/five-weeks-after-the-guardians-viral-blockbuster-assangemanafort-scoop-no-evidence-has-emerged-just-stonewalling/].

It is false and defamatory to suggest that Julian Assange has ever met or communicated with George Cottrell [see <u>https://</u> <u>twitter.com/wikileaks/status/1068475150314676225</u>].

It is false and defamatory to suggest that WikiLeaks or Julian Assange privately provided information about its then pending 2016 U.S. election-related publications to any outside party, including Nigel Farage, Roger Stone, Jerome Corsi, Donald Trump Jr., Michael Flynn, Michael Flynn Jr., Cambridge Analytica, or Rebecca Mercer [it is defamatory because it falsely imputes that Julian Assange acted without integrity in his role as the editor of WikiLeaks, associates with criminals, or has committed a crime].

It is false and defamatory to suggest that Julian Assange or WikiLeaks has ever colluded with or conspired with, or compromised the integrity of its journalism for, any political campaign or State [in fact, published communication records show WikiLeaks doing exactly the opposite: rejecting approaches by Cambridge Analytica and the Trump campaign for information on its pending publications, see https://defend.wikileaks.org/].

It is false and defamatory to suggest that Julian Assange was in communication with Roger J. Stone during, or prior to, the U.S. 2016 presidential election [in fact, the only message sent from WikiLeaks was a demand that Mr. Stone cease falsely stating that he had "communicated" with Julian Assange]. It is false and defamatory to suggest that there was a "back channel" between Julian Assange and Roger J. Stone during, or prior to, the U.S. 2016 presidential election.

It is false and defamatory to suggest that Nigel Farage met with Julian Assange during, or prior to, the U.S. 2016 presidential election.

It is false and defamatory to suggest that the purpose of Nigel Farage's meeting with Julian Assange in 2017, after the U.S. election, was in any way improper or not journalistic.

It is false and defamatory to suggest that WikiLeaks or Julian Assange timed the publication of its series on John Podesta to conceal the Access Hollywood "grab them by the pussy" video of Donald Trump [in fact, it is well documented that the video release was moved forward three days to be on the day of WikiLeaks' publication, see <u>https://consortiumnews.com/</u> <u>2018/07/19/inside-wikileaks-working-with-the-publisher-that-</u> changed-the-world/].

It is false and defamatory to suggest that Julian Assange is "anti-American" or "anti-U.S." [in fact, he has an abiding love for the United States, see https://www.washingtonpost.com/ opinions/julian-assange-wikileaks-has-the-same-mission-as-thepost-and-the-times/2017/04/11/23f03dd8-1d4d-11e7a0a7-8b2a45e3dc84 story.html].

It is false and defamatory to suggest that Julian Assange and WikiLeaks have not published critical information on Russia, Syria or Donald Trump [in fact, WikiLeaks has published hundreds of thousands of documents on Russia, millions on Syria, and thousands on Donald Trump, see <u>https://wikileaks.org/spyfiles/ russia/, https://search.wikileaks.org/?</u> <u>query=russia%7Cputin%7Cmoscow#results, https://wikileaks.org/</u> <u>syria-files/ & https://search.wikileaks.org/?</u> <u>query=trump#results</u>].

It is false and defamatory to suggest that Julian Assange has ever worked for, or has ever been employed by "Russia Today", "RT" or the Russian government.

It is false and defamatory to suggest that Julian Assange was "given a show", "made a host", or "hosted a show" on RT [in fact, in 2012, he and two British companies, Dartmouth Films and Journeyman Pictures conceived, produced and distributed "The World Tomorrow", which was licensed to a dozen broadcasters and newspapers, only one of which was RT].

It is false and defamatory to suggest that WikiLeaks "works with RT" or "works with Russian State media" [in fact, only once, for one publication in 2012, was RT part of a consortium of nearly two dozen re-publishers of WikiLeaks' series on the private surveillance industry, the SpyFiles].

It is false and defamatory to suggest that Julian Assange or WikiLeaks arranged for Edward Snowden to go to Russia [in fact, WikiLeaks gave legal assistance to Mr. Snowden to obtain asylum in Ecuador, but the U.S. government cancelled Mr. Snowden's passport mid-flight, stranding him in a Moscow transit lounge for 40 days [see https://edwardsnowden.com/].

It is false and defamatory to suggest that Julian Assange applied for a Russian visa in 2010 or obtained a Russian visa in the year 2010 or subsequently.

It is false and defamatory to suggest that there was a "Russian plan" to "smuggle", or to otherwise remove, Julian Assange from the Ecuadorian embassy in London or that Fidel Narvaez, or anyone else, was in contact with the Russian embassy in London in relation to such a claimed plan [see <u>https://therealnews.com/</u> <u>stories/ecuadorian-ex-diplomat-report-claiming-assange-met-</u> <u>manafort-is-false</u>].

It is false and defamatory to suggest that Julian Assange was made an Ecuadorian diplomat to Russia [in fact, his diplomatic credentials were lodged to the government of the United Kingdom and he was appointed as an Ecuadorian diplomat to the United Kingdom; at no point were they lodged with Russia].

It is false and defamatory to suggest that WikiLeaks or Julian Assange claimed that any person or entity was their source for WikiLeaks' 2016 U.S. election publications [it is defamatory because Julian Assange's professional reputation is substantially based on source protection].

It is false and defamatory to suggest that WikiLeaks does not have a perfect record of accurately verifying its publications.

It is false and defamatory to suggest that the U.S. government has ever denied the authenticity of a WikiLeaks publication. It is false and defamatory to deny that DNC Chair Donna Brazile and Senator Elizabeth Warren admitted that Julian Assange was, in fact, correct and that the DNC had indeed "rigged" the 2016 primary election in favour of Hillary Clinton [see <u>https://</u> <u>twitter.com/wikileaks/status/926250463594516480</u> and <u>https://</u> <u>twitter.com/wikileaks/status/926094515261378561</u>].

It is false and defamatory to suggest that John Podesta or Donna Brazile deny the authenticity of emails about them published by WikiLeaks [in fact, Brazile confessed that WikiLeaks was correct and she had indeed shared debate questions with the Hillary Clinton campaign <u>https://twitter.com/wikileaks/status/</u> 843216277225308161].

It is false and defamatory to suggest that the French government found that "MacronLeaks" were hacked by Russia [in fact, the head of the French cyber-security agency, ANSSI, said that they did not have evidence connecting the hack with Russia, see https://wikileaks.org/macron-emails/].

It is false and defamatory to suggest that WikiLeaks "targetted" the French presidential election of 2017 and published "MacronLeaks" during that election [in fact, WikiLeaks published MacronLeaks after the election].

It is false and defamatory to suggest any of the MacronLeaks published by WikiLeaks are inauthentic or that President Macron attempted to make such a claim after the publication by WikiLeaks.

It is false and defamatory to suggest that Julian Assange or WikiLeaks has ever stated that Russia was not behind the attempted murder of former Russian spy Sergei Skripal [in fact, Julian Assange stated that it was "reasonable" to view Russia as "the leading suspect"].

It is false and defamatory to suggest that Julian Assange or WikiLeaks has ever stated it was not appropriate to expel Russian diplomats and spies over the attempted murder of Sergei Skripal.

It is false and defamatory to suggest that Ecuador isolated and gagged Mr. Assange due to his comments on Sergei Skripal [in fact, he was isolated over his refusal to delete a factually accurate tweet about the arrest of the president of Catalonia by Spain in Germany, along with U.S. debt pressure on Ecuador. The president of Ecuador Lenin Moreno admitted that these two countries were the issue, see <u>https://defend.wikileaks.org/</u> <u>about-julian/</u>].

It is false and defamatory to suggest that Julian Assange does not have political asylum or is merely "seeking asylum" [in fact, he won his asylum case in relation to U.S. government moves to prosecute him on August 16, 2012 and was granted formal refugee status under the 1951 Refugee Convention, see <u>https://</u> <u>defend.wikileaks.org/about-julian/</u>].

It is false and defamatory to suggest that Julian Assange "fled" to the Embassy of Ecuador [in fact, he walked into the embassy and lodged an asylum claim; it was not until 10 days later that the UK government issued a warrant for his arrest. see https://defend.wikileaks.org/about-julian/].

It is false and defamatory to suggest that Julian Assange is, or has been, "hiding" in the embassy [in fact, his location is well known and his formal legal status is "political refugee"; it is incorrect to suggest that refugees, by virtue of being in the jurisdiction of refuge, are "hiding"].

It is false and defamatory to deny that Julian Assange has been formally investigated since 2010 and charged by the U.S. federal government over his publishing work [it is defamatory because such a claim falsely imputes that Mr. Assange's asylum is a sham and that he is a liar, see <u>https://defend.wikileaks.org/</u>]. - It is false and defamatory to suggest that such U.S. charges have not been confirmed [in fact, they have, most recently by Associated Press (AP) and the Washington Post in November 2018]. - It is false and defamatory to suggest that the U.S. government denies the existence of such charges.

- It is false and defamatory to suggest that Julian Assange is not wanted for extradition by the U.S. government [in fact, public records from the Department of Justice show that the U.S. government says it had been intentionally concealing its charges against Mr. Assange from the public specifically to decrease his ability to "avoid arrest and extradition"].

- It is false and defamatory to suggest that the U.S. government has not publicly confirmed that it has an active grand jury, or

pending or prospective proceedings, against Julian Assange or WikiLeaks, each year since 2010.

It is false and defamatory to suggest that Julian Assange's asylum is "self-imposed" or that he is "free to walk out any time he likes" [in fact, the UK government states that he will be immediately arrested, the U.S. government seeks his extradition and the exits to the embassy are under 24-hour surveillance; it is self-evident that refugees, having been compelled by the risk of persecution to seek asylum are not "free" to return to the area of risk, any more than one is free to leave a house with a bear on the porch, see https://defend.wikileaks.org].

It is false and defamatory to suggest that Julian Assange applied for political asylum over "sex allegations" or "extradition to Sweden" or to "avoid questioning" [in fact, he formally applied for and received political asylum over the U.S. grand jury proceedings against him; the UN and the Swedish courts found that Sweden was improperly refusing to question him, not the other way around, see <u>https://defend.wikileaks.org/</u> about-julian/].

It is false and defamatory to suggest that Julian Assange is merely a "guest" of the embassy and does not have refugee status, including under the 1951 Refugee Convention, or that the UK is not a party to the Convention, or that Julian Assange received only "diplomatic asylum" or that his refugee status is, in any sense, improper or incomplete [it is defamatory because it suggests that Julian Assange committed a crime by applying for asylum, which is false, see https://defned.wikileaks.org/].

It is false and defamatory to suggest that Julian Assange, as a political refugee, does not have the right to voice his political opinions or a right to communicate them [it is defamatory because it falsely suggests Mr. Assange is a liar when he states he has never agreed to be gagged and when he asserts that it is a fact that refugees have the legal right to express political opinions and because his reputation is to a significant degree based on the accuracy of his statements and in being the world's best-known free speech proponent and practitioner].

It is false and defamatory to suggest that Julian Assange did not have the right to apply for asylum or committed an offence in doing so [in fact, he has not been charged with an offence in the UK at any time and a "reasonable excuse" is a complete defence against any hypothetical future charge of "failing to surrender" under UK law and there has been no legal finding that his defence is invalid, see <u>https://defend.wikileaks.org/about-</u> julian/].

It is false and defamatory to suggest that the terminated Swedish preliminary investigation started prior to the U.S. grand jury proceedings [in fact, the U.S. grand jury proceedings started in June 2010, three months before the Swedish preliminary investigation].

It is false and defmatory to suggest that the dropped Swedish preliminary investigation against Julian Assange ever had any legitimacy whatsoever [in fact, already by August 2010, the Chief Prosecutor of Stockholm found that "no crime at all" had been committed, and SMS messages from the alleged complainant showed that she "did not want to accuse Assange of anything", that she felt "railroaded by police and others around her", and that "police made up the charges"; documents from the UK government prove serious impropriety by the State, and the United Nations Working Group on Arbitrary Detention (UN WGAD)found Sweden's conduct to be illegal, see <u>https://</u> defend.wikileaks.org/about-julian/].

It is false and potentially defamatory to suggest that the UN WGAD decision finding Julian Assange to be unlawfully detained in the UK is not legally binding [in fact, the UN has released two statements in response to such false reporting, stating that the decision is "legally binding" <u>https://twitter.com/</u> UN SPExperts/status/1076107846629158914].

It is false and defamatory to suggest that Julian Assange has ever been charged with, or committed, an offence in the United Kingdom.

It is false and defamatory to suggest that Julian Assange has ever "breached his bail", "jumped bail", absconded, fled an arrest warrant, or that he has ever been charged with such at any time.

It is false and defamatory to suggest that Julian Assange has a sentence to serve or has ever avoided serving a sentence.

It is false and defamatory to suggest that Julian Assange fled Sweden [in fact, the State prosecutor granted him permission to leave, he was not wanted for arrest or charged with an offence at the time he left Sweden, and he left for a publicly scheduled talk in Geneva, see https://defend.wikileaks.org/about-julian/].

It is false and defamatory to suggest that Julian Assange has been accused by any person of raping them [in fact, both socalled Swedish "complainants", who were falsely reported to have made such an accusation, denied that they had been raped, see https://defend.wikileaks.org/about-julian/].

It is false and defamatory to suggest that the Swedish preliminary investigation was closed due to an inability to proceed caused by Mr. Assange or a statute of limitations [in fact, the prosecution abandoned the entire preliminary investigation, the arrest warrant was dropped, and the file closed and destroyed as the direct result of Julian Assange filing a case against the government of Sweden for its abuse of legal due process; the UN WGAD also twice found that Sweden had acted unlawfully, see <u>https://defend.wikileaks.org/about-</u> julian/].

It is false and defamatory to suggest that Julian Assange was never interviewed by Swedish officials or has ever attempted to avoid being interviewed by Swedish officials [see <u>https://</u> <u>defend.wikileaks.org/about-julian/</u>].

It is false and defamatory to suggest that there was ever a charge, case or prosecution against Julian Assange in Sweden [in fact, the matter never reached beyond the "preliminary investigation" stage].

It is false and defamatory to deny that WikiLeaks is a media organization [in fact, WikiLeaks has won many media awards, is registered as a media organization, has been repeatedly found to be a "media organization" by the UK courts, and employs top journalists who (including Julian Assange) are members of their respective media unions, see https://defend.wikileaks.org/].

It is false and defamatory to deny that Julian Assange is an award-winning editor, journalist, publisher, author and documentary maker who has won the highest journalism award in his country, among many others. [https://defend.wikileaks.org/about-julian/]

It is false and defamatory to suggest that Julian Assange or WikiLeaks has ever, through intent or negligence, revealed a source [in fact, in the case of alleged source Chelsea Manning, the allegation by the State is that Manning spoke, in a knowing breach of WikiLeaks' security rules, to a reseacher for Wired magazine, Adrian Lamo, who promised him journalistic confidentiality, only to then inform on him to the FBI].

It is false and defamatory to suggest that WikiLeaks is a "group", that it has "members" or that Julian Assange is a "member" of WikiLeaks [in fact, WikiLeaks is a publication and a publishing organization; it has a highly accomplished salaried staff, not members; it is not al-Qaeda].

It is false and defamatory to suggest that Julian Assange or WikiLeaks has ever directed, conspired, or colluded in a criminal manner with its sources.

It is false and defamatory to suggest that Julian Assange claimed "informants deserve to die" [in fact, Der Spiegel signed a statement refuting a false claim that he did, see https://twitter.com/wikileaks/status/762711823216996352].

It is false and defamatory to suggest that WikiLeaks or Julian Assange has asserted that the Syrian government did not conduct chemical attacks during the war in Syria [in fact, WikiLeaks has published millions of documents from the Syrian government, including Bashar al-Assad's personal emails <u>https://</u> wikileaks.org/syria-files/].

It is false and defamatory to suggest that WikiLeaks publications have caused deaths [in fact, the Pentagon's General Robert Carr, who was assigned to look at their impact, admitted under oath in the trial of Chelsea Manning that the U.S. government had not been able to find any such incidents].

It is false and defamatory to suggest that Julian Assange or WikiLeaks recklessly published unredacted U.S. diplomatic cables [see https://wikileaks.org/Guardian-journalist- negligently.html].

It is false and defamatory to suggest that any of WikiLeaks' claims about its 2017 CIA leak, Vault 7, "were later retracted" [the series had no retractions].

It is false and defamatory to suggest that WikiLeaks or Julian Assange ever published millions of records about female voters in Turkey [see https://wikileaks.org/10years/distorted-facts.html].

It is false and defamatory to suggest that Julian Assange is not an Australian citizen.

It is false and defamatory to suggest that Julian Assange is a "hacker".

It is false and defamatory to suggest that Julian Assange was charged with an offence at any time by Bermuda.

It is false and defamatory to suggest that Julian Assange has ever extorted the United States government.

It is false and defamatory to suggest that Julian Assange filed a lawsuit against Ecuador over trivialities [in fact, he filed an injunction to force the state to cease illegally gagging and isolating him since March 28, 2018 and moving to void his asylum after his publication of the largest leak in CIA history. Contrary to false reports, his cat hasn't even been at embassy since well before the inunction was filed, see <u>https://</u> justice4assange.com/Protection-Action.html and <u>https://</u> defend.wikileaks.org/].

It is false and defamatory to suggest that Julian Assange has ever neglected an animal or has ever been asked by a state to take "better care" of an animal [see <u>https://</u> justice4assange.com/Protection-Action.html].

It is false and defamatory to suggest that Julian Assange has ever called to overthrow the Spanish state by calling for the independence of Catalonia [in fact, he never called for the independence of Catalonia].

It is false and defamatory to suggest that Julian Assange's reporting on the violence and censorship inflicted against Catalans in any way connected to Russia [in fact, the managing editor of El Pais, David Alandete, was fired for spreading this false claim]. It is false and defamatory to suggest that the Catalan government, or any other entity, paid Julian Assange to report on the violence and censorship inflicted against Spain's Catalan minority, or to otherwise support their right to selfdetermination [in fact, Spanish prosecutors confirmed that there were no records of Mr. Assange receiving such payments contrary to what had been falsely reported].

It is false and defamatory to suggest that Julian Assange is "far right".

It is false and defamatory to suggest that Julian Assange is a racist.

It is false and defamatory to suggest that Julian Assange is a paedophile.

It is false and defamatory to suggest that Julian Assange is a rapist.

It is false and defamatory to suggest that Julian Assange is a murderer.

It is false and defamatory to suggest that Julian Assange is a member of the Muslim Brotherhood.

It is false and defamatory to suggest that Julian Assange has ever proposed that he not publish, censor or delay a publication in exchange for any thing.

It is false and defamatory to suggest that Julian Assange has ever agreed to do anything or to not do anything as a condition of his asylum.

It is false and defamatory to suggest that the administration of President Rafael Correa imposed any conditions in exchange for his refugee status or asylum.

It is false and defamatory to suggest that Julian Assange is a criminal or has a criminal record [in fact, his convictions for offences as a teenager in Australia have been expunged].

It is false and defamatory to suggest that Julian Assange called the Panama Papers "a Soros-funded attack against Putin" [see https://twitter.com/wikileaks/status/717810984673484800]. It is false and defamatory to suggest that WikiLeaks or Julian Assange has ever published, uttered or tried to promote a "conspiracy theory".

It is false and defamatory to suggest that WikiLeaks or Julian Assange has ever suppressed materials critical of Israel, Russia or any other State.

It is false and defamatory to suggest that WikiLeaks possessed unpublished leaked material on the Trump campaign or the GOP or Russia and surpressed it.

It is false and defamatory to suggest that Julian Assange has ever hacked the state of Ecuador.

Other important facts and corrections to false reporting can be found at https://defend.wikileaks.org/, https://wikileaks.org/, https://wikileaks.org/, https://twitter.com/assangedefence/, https://twitter.com/assangedefence/, https://twitter.com/assangedefence/, https://twitter.com/assangelegal and https://twitter.com/