

EXHIBIT A

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
CHARITON COUNTY
STATE OF MISSOURI

FIRECLEAN LLC,)
)
Plaintiff,)
)
vs.)
)
THE FIREARM BLOG;)
)
STEVE JOHNSON;)
)
PHILLIP WHITE;)
)
NATHANIEL FITCH;)
)
SECOND MEDIA INCORPORATED;)
)
Serve at:)
)
David Rudolf, Registered Agent)
2960 Van Ness Avenue, Suite C)
San Francisco, CA 94109)
)
Defendants.)

Case No.: 17CH-CC00018

FIRST AMENDED PETITION

COMES NOW Plaintiff FireClean LLC, through undersigned counsel, and for its Petition against Defendants The Firearm Blog and/or Second Media Inc.; Steve Johnson; Phillip White; and Nathaniel Fitch, states as follows:

The Parties

1. Plaintiff FireClean LLC (“FireClean”) is a privately owned, Virginia Limited Liability Company headquartered in Virginia.

2. Defendant The Firearm Blog (“The Firearm Blog”) is an organization operating a blog and website, with an editorial office located, upon information and belief, in Salisbury,

Missouri, in Chariton County, at all times relevant to the events pleaded in this First Amended Petition.

3. Upon information and belief, Defendant Second Media Inc. ("Second Media") is a San Francisco-based media company that is the owner and/or direct corporate parent of The Firearm Blog.

4. Upon information and belief, Defendant Steve Johnson ("Johnson") is an individual residing in or around Washington, D.C., is the founder and former managing editor of The Firearm Blog, and served as The Firearm Blog's editor at all times relevant to the events pleaded in this First Amended Petition.

5. Upon information and belief, Defendant Phillip White ("White") is an individual residing in Salisbury, Chariton County, Missouri, and is, or previously was, at all times relevant to the events pleaded in this First Amended Petition, an employee and editor of The Firearm Blog.

6. Upon information and belief, Defendant Nathaniel Fitch ("Fitch") is an individual working as an employee who was employed by and/or associated with the editorial office of The Firearm Blog located in Chariton County, Missouri at all times relevant to the events pleaded in this First Amended Petition.

Jurisdiction and Venue

7. A substantial portion of the events and omissions giving rise to the claims made in this Petition, including the editing and posting of the actionable statements detailed herein, took place in Chariton County, Missouri at the editorial office of The Firearm Blog.

8. Defendant White resides in Salisbury, Missouri, in Chariton County, Missouri.

9. The Firearm Blog, which, upon information and belief, is owned by Defendant Second Media, is or was operated, substantially or in part, from Salisbury, Missouri, in Chariton County, Missouri, and, upon information and belief, the statements referenced in this claim were edited and published from The Firearm Blog's offices in Chariton County, Missouri.

10. Defendant Johnson subjected himself to this Court's jurisdiction by, upon information and belief, operating a company and editing a website whose business office and editorial staff is or was located and based in Missouri. §§ 506.500(1); 506.500(3).

11. Defendant Nathaniel Fitch subjected himself to this Court's jurisdiction by virtue of his employment by and submission of articles to a company and website whose business office is or was, upon information and belief, located and based in Missouri, and by submitting articles for editing by a Missouri-based editor and/or editorial staff. §§ 506.500(1); 506.500(3).

12. This case involves one or more claims in controversy that exceed \$25,000.00.

13. As a result, this Court has proper and original jurisdiction over each of the Defendants pursuant to Mo. Rev. Stat. § 508.010.

14. Venue of this action is proper before this Court pursuant to Section 508.010, RSMo.

BACKGROUND FACTS COMMON TO ALL COUNTS

A. The Firearm Blog

15. The Firearm Blog is a website dedicated to all things firearm related, and discusses both consumer firearms and military small arms. The website describes itself as the "authoritative news source" for all individuals with a "passion for firearms."

16. Upon information and belief, the owner and/or direct corporate parent of The Firearm Blog is Second Media. It is unknown to Plaintiff to what extent The Firearm Blog is a separate entity as opposed to a property of Second Media.

17. The Firearm Blog invites, encourages, helps, and authorizes its contributors, readers, users, or business relations to publish statements and articles through www.thefirearmblog.com.

18. Members of the general public may access and read the statements and articles The Firearm Blog invites, encourages, helps, and authorizes its contributors, readers, users, or business relations to publish through the website www.thefirearmblog.com.

19. The Firearm Blog and/or Second Media also keep and maintain accounts on, and utilize, other platforms to maximize audience, including Facebook and other electronic media platforms.

20. The Firearm Blog and/or Second Media control which statements and articles get published, which statements and articles do not get published, which statements and articles get deleted after being published, and which statements and articles do not get deleted after being published onto the website www.thefirearmblog.com.

21. The Firearm Blog and/or Second Media decide which articles will appear or be published on the website www.thefirearmblog.com, and related media accounts and promotes certain articles by placing the articles prominently on the front page of the website.

22. Upon information and belief, as the creator, founder, manager, publisher, and editor-in-chief of The Firearm Blog, Defendant Steve Johnson controlled which statements and articles get published, which statements and articles do not get published, which statements and articles get deleted after being published, and which statements and articles do not get deleted

after being published via www.thefirearmblog.com and on other platforms, during his tenure with The Firearm Blog.

23. Upon information and belief, while acting as manager and editor-in-chief of The Firearm Blog, Defendant Johnson exercised control as both an editor and as a moderator over the article and follow-up commentary posted on www.thefirearmblog.com and on other platforms, as referenced below.

24. Upon information and belief, as the associate editor and moderator of The Firearm Blog, Defendant Phillip White has or had editorial control over which statements and articles get published, which statements and articles do not get published, which statements and articles get modified and deleted after being published, and which statements and articles do not get modified and deleted after being published via www.thefirearmblog.com and on other platforms, including statements and articles authored by The Firearm Blog's employees, contributors, users, readers, or business associates.

25. Upon information and belief, while acting as an editor and moderator of The Firearm Blog, Defendant White exercised control as both an editor and as a moderator over the article and follow-up commentary posted on www.thefirearmblog.com and on other platforms referenced below. Defendant White exercised editorial control over each of the actionable statements in the article referenced below, and moderated many of the comments that were posted on and/or related to the article referenced below.

26. Defendant Fitch is a writer and employee of The Firearm Blog, and wrote the article and actionable statements that were posted on www.thefirearmblog.com and on other platforms, as referenced below.

27. In addition, Defendant Fitch wrote and posted additional actionable statements about Plaintiff as commentary to The Firearm Blog's website, to Facebook, and elsewhere, and in response to comments and criticism made by readers of the article.

28. The Firearm Blog and/or Second Media maintain various social media accounts to promote and direct the general public to the content available at www.thefirearmblog.com, including Facebook, Google+, Instagram, Twitter, and a YouTube video channel entitled "TFB TV" that posts videos with content related to The Firearm Blog.

29. The Firearm Blog and/or Second Media promised to comply with the terms of use agreements, user agreements, acceptable use policies, community standards, or other similar standards of conduct pertaining to third party beneficiaries that all Facebook, Google+, Instagram, and Twitter users promise to comply with when they use these companies' social media services to publish content online.

30. The Firearm Blog and/or Second Media promote certain articles posted onto The Firearm Blog's website by spreading links to the articles through The Firearm Blog's various social media accounts.

31. The Firearm Blog targets a diverse audience of gun and weapon owners, gun oil users, retailers, members of the military, and gun aficionados.

32. The Firearm Blog's target audience includes people who use gun oil; people who have considered using FireClean products; people and organizations who have used FireClean products; and people and organizations who use products that compete with FireClean's products.

33. The Firearm Blog is widely read within this target audience and community.

34. Each of The Firearm Blog's articles and publications get widespread publicity to the public at large.

35. Articles posted on The Firearm Blog's website are often linked to and distributed through various other firearm blogs, websites, forums, and social media accounts, each with similar target audiences in the gun community.

36. Because of The Firearm Blog's ability to reach this target audience, and because of the influence The Firearm Blog has within this target audience, The Firearm Blog is able to sell advertisement space to manufacturers, distributors, and retailers of gun oil.

37. The Firearm Blog and/or Second Media sell advertising space on The Firearm Blog website to various manufacturers and distributors of firearms, firearm accessories, and to other industries related to firearms.

38. The articles and commentary cited are of and concerning the Plaintiff, and identify the Plaintiff and its products by name and/or by direct inference.

B. FIREClean®

39. FireClean was formed in Virginia in May 2012 by David and Edward Sugg (the "Sugg Brothers") to distribute and sell the FIREClean® product.

40. The FIREClean® product functions as a firearm lubricant and cleaner, commonly referred to as gun oil.

41. FIREClean® is a proprietary product that helps prevent and reduce the build-up and adhesion of carbon residue on firearms, thereby improving the reliability and performance of the firearm.

42. When a thin layer of FIREClean® is applied to appropriate areas of a firearm, the product provides a thin protective layer to protect the firearm from carbon and other fouling, and lubricates relevant moving parts of the firearm.

43. The FIREClean® product was developed by the Sugg Brothers, and is not marketed or sold under any other name, label, or brand.

44. The formula for FIREClean® is a trade secret, consisting of a proprietary blend of patent-pending ingredients. A broad range of the potential ingredients of FIREClean®'s formula can be found in FIREClean®'s publicly available patent application. This application was available to the public for two years prior to publication of the "Crisco Article" by Defendants.

45. According to the patent application, WO2013142363A1, a preferred composition consists of a proprietary blend of at least three "natural, non-petroleum, non-synthetic oil[s] derived from a plant, vegetable or fruit or shrub or flower or tree nut, or any combination of natural, non-petroleum, non-synthetic oils derived from a plant, vegetable or fruit or shrub or flower or tree nut," where each oil in the oil composition is "distinct from the other and each [has] a smoke point above 200° F," desirable due to its heat resistance and resultant ability to maintain the integrity and lubricity of the oil even at very high operating temperatures, as often occurs in firearms.

46. The patent application for FIREClean® stipulates a preference for an oil composition that contains at least one high-oleic oil, or highly monounsaturated fatty acid, which is preferred over significantly polyunsaturated fatty acids (as found in common vegetable oils) due to the enhanced temperature range, enhanced storage stability, enhanced performance, and the non-drying and non-gumming nature of high-oleic oils.

47. The fatty acid composition of Crisco-branded oils, on the other hand, consist of significantly higher levels of polyunsaturated fatty acids, a fact which is made readily apparent on Crisco's packaging which is available to any consumer. In fact, every bottle of Crisco sold lists both polyunsaturated and monounsaturated fat levels.

48. FIREClean® is not made from a single type of oil.

49. FIREClean® is not Crisco Canola Oil.

50. FIREClean® is not common canola oil.

51. Crisco Vegetable Oil is, in fact, (common) soybean oil.

52. FIREClean® is not Crisco Vegetable Oil.

53. FIREClean® is not common soybean oil.

54. FIREClean® is not a re-labeled or repackaged pre-existing consumer or retail product.

55. Between its development date in 2012 and September 2015, FIREClean® was a successful product.

56. Since sales of FIREClean® began in 2012, FireClean LLC's revenue increased at a steady rate of twenty to fifty percent annually.

57. In or around July-August-September of 2015, George Fennell ("Fennell") started a false rumor about FIREClean®, falsely claiming that FIREClean® is repackaged generic cooking oil, such as a repackaged Crisco-brand oil.

58. Mr. Fennell is an owner and chief technical operator of Steel Shield Technologies, LLC ("Steel Shield Technologies").

59. Steel Shield Technologies sells a competing gun lubricant and is a direct competitor of FireClean.

60. To increase his profits and to undermine FireClean, Mr. Fennell started a false rumor alleging that FIREClean® is nothing more than a repackaged, Crisco-brand oil that can be purchased in a store at a much cheaper price than FIREClean®.

61. This allegation of Mr. Fennell falsely accused FireClean of illegally or unlawfully deceiving and defrauding the purchasers of FIREClean®.

62. Mr. Fennell enlisted the help of an individual or individuals active in the firearm community to help spread this initial false allegation about FIREClean®.

63. At the bequest of Mr. Fennell, this false allegation about FIREClean® was posted on at least eight known firearm forums or blogs

C. The Spectroscopy Article

64. Mr. Fennell was in direct contact and had a preexisting relationship with Andrew Tuohy (“Tuohy”), a contributor to The Firearm Blog.

65. After having discussions with Mr. Fennell about Mr. Fennell’s FIREClean® allegation, Mr. Tuohy reached out to the Sugg Brothers to ask whether they had a response to competitor claims that FIREClean® was Crisco-brand oil.

66. Mr. Tuohy sent Edward Sugg a Facebook message on August 29, 2015, stating “Ed, do you guys have a response to the claims that FireClean is just Crisco? Andrew.”

67. Edward Sugg replied to the message with the following denial: “Hi Andrew – categorically deny. If you let me know where you are hearing it I would appreciate it. If it’s a competitor it will generate a strong response. Thanks! Ed.”

68. Unknown to FireClean at the time, Mr. Tuohy had been in regular communication with Mr. Fennell prior to sending this message.

69. In fact, in a statement written and posted in January of 2016, Mr. Fennell publicly admitted to having directed Mr. Tuohy's actions and testing regarding FIREClean®.

70. Mr. Tuohy went on to publicize Mr. Fennell's fabrication through postings on Mr. Tuohy's website and Facebook account, where Mr. Tuohy claimed to have commissioned "scientific testing" that showed or implied that FIREClean® is nothing more than Crisco Vegetable Oil or Crisco Canola Oil that could easily be purchased in a grocery store at a much cheaper price than FIREClean®, that FIREClean® was ineffective and not worth its price, and that FireClean and the Sugg Brothers were dishonest and should not be trusted.

71. Mr. Tuohy lacked any educational or vocational basis in science, and any needed qualifications, that would enable him to adequately perform testing and analyze test results on oil compositions.

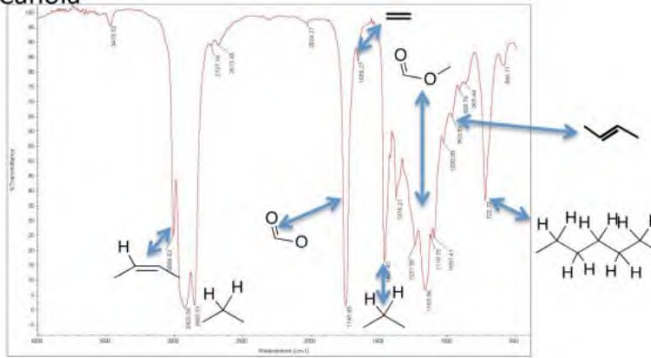
72. Mr. Tuohy used low resolution testing- known to produce "false positive" results- while reaching conclusions only appropriate to high resolution testing. The statements made by Mr. Tuohy could not be supported factually by the FTIR test he claims to have had run.

73. On September 12, 2015, Mr. Tuohy published a blog post onto his blog entitled "Lies Errors and Omissions; Infrared Spectroscopy of FireClean and Crisco Oils" (the "Spectroscopy Article").

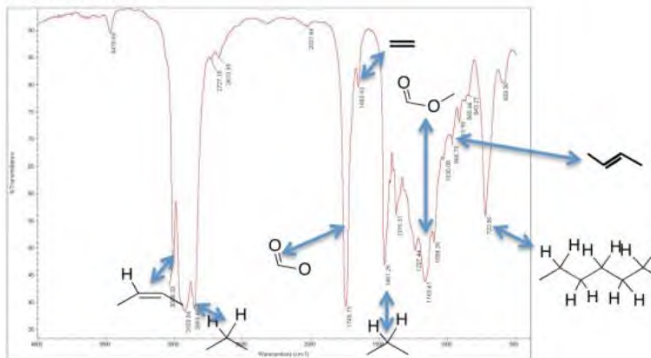
74. The Spectroscopy Article is publicly available at:
<http://www.vuurwapenblog.com/general-opinion/lies-errors-and-omissions/ir-spectra-fireclean-crisco/>.

75. The Spectroscopy Article publishes the following spectra, using different scaling for the charts to accentuate the apparent similarities of entirely different substances:

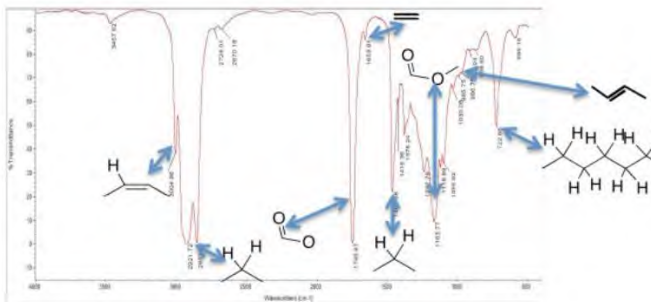
Crisco Pure Canola



Crisco Pure Vegetable oil



Fire Clean



76. The statements in the Spectroscopy Article, alongside the side-by-side spectra comparison, convey the false and disparaging notion that FIREClean® is Crisco Vegetable Oil, Crisco Canola Oil, or otherwise common cooking oil.

77. Because FIREClean®, Crisco Canola Oil, and Crisco Vegetable Oil each contain plant or vegetable-based oils from the same class of triacylglyceride compounds, similar results are expected.

78. A Fourier Transform Infrared Spectroscopy (“FTIR”, “infrared spectroscopy,” or “Spectroscopy”) is not a scientifically suitable testing method for comparing oils from the same class of compounds because it cannot accurately determine the differences between FIREClean® and similar, but different substances, nor can it compare or analyze the fat saturation levels nor unsaturation differences of plant-based oils.

79. An infrared spectroscopy is incapable of adequately resolving or comparing carbon chain lengths and carbon chain structures of the fatty acids or of providing any detailed compositional analysis – each critical attributes when comparing plant-based oils.

80. A wide variety of vegetable-based oils, including olive oils, coconut oils, and almond oils, when subjected to an infrared spectroscopy test, will all give similar test results.

81. Distinctly different substances, with different characteristics, will have essentially identical spectra.

82. The Spectroscopy’s published analysis of FIREClean® is not scientifically sound, did not include any controls, failed to analyze other substances, and failed to evaluate whether many oils or blends would have similar basic patterns.

83. In addition to testing FIREClean®, the infrared spectroscopy performed for and analyzed in the Spectroscopy Article used two different Crisco oils, Crisco Canola Oil and Crisco Vegetable (soybean) Oil. The results of the infrared spectroscopy, as analyzed in the Spectroscopy Article, indicates that these two distinct Crisco oils have effectively identical spectra.

84. Crisco Canola Oil and Crisco Vegetable (soybean) Oil have fatty acid compositions entirely distinct from one another. The compositions of Crisco Vegetable Oil and

Crisco Canola Oil are not trade secrets - the oil profile for each Crisco Oil is published, by law, in plain sight on each bottle of Crisco Oil sold in the United States.

85. The infrared spectroscopy and the Spectroscopy Article analysis' determination that Crisco Canola Oil and Crisco Vegetable Oil had effectively identical spectra should have been an obvious indicator of the unsuitability of FTIR testing for this analysis, and should have given pause to any individual performing, analyzing, or reviewing the test results.

86. The infrared spectroscopy's determination that Crisco Canola Oil and Crisco Vegetable (common soybean) Oil had (effectively) identical spectra should have strongly suggested to any reasonable or careful person reading or analyzing the test results that the FTIR testing method was producing false-positive, erroneous results that could not be adequately relied on to make definitive conclusions.

87. The Spectroscopy Article based its analysis on an unreliable and inadequate testing method, which is known to, and did, give false-positive results. The Spectroscopy Article failed to perform any other number of tests that could have adequately determined whether the oil substances were the same, such as a simple and inexpensive gas chromatography-mass spectrometry test, available at commercial laboratories.

D. The Crisco Article

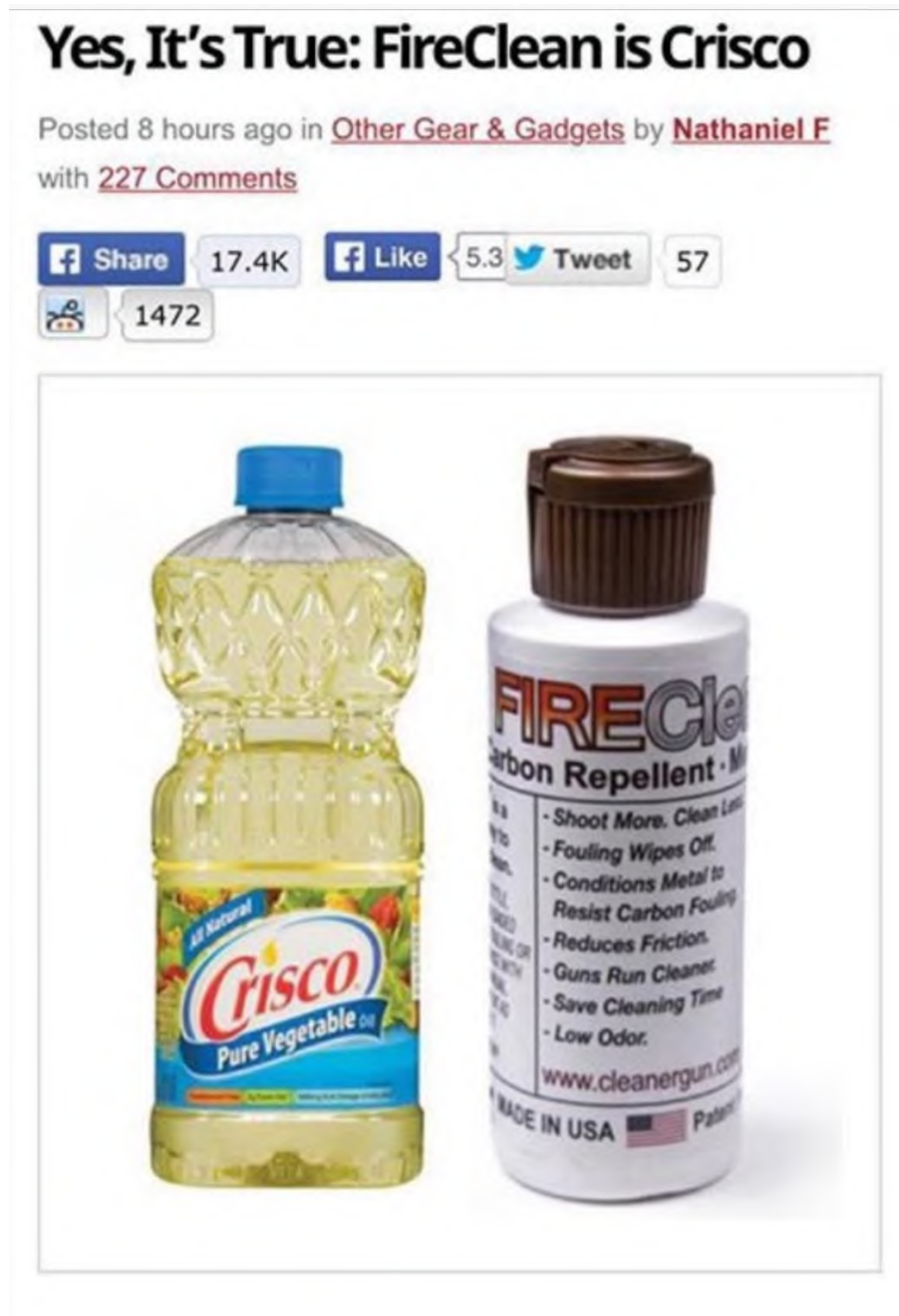
88. The next day, on September 13, 2015, The Firearm Blog posted an article entitled, "Yes, It's True: FireClean is Crisco" ("The Crisco Article").

89. The Crisco Article linked to and promoted the findings of the Spectroscopy Article.

90. The Crisco Article begins with a full-page color picture of a bottle of FIREClean®, at a distorted size, next to a bottle of Crisco oil.

91. The false connotation of The Crisco Article's illustration is that the two products, FIREClean® and Crisco, are equivalent and the same.

92. On the date of initial publication, The Crisco Article appeared on The Firearm Blog's website as follows:



93. The author of The Crisco Article, Defendant Fitch, included a direct link to the Spectroscopy Article in The Crisco Article.

94. The Crisco Article contains includes the following actionable statements (the “Crisco Article Statements”) concerning the FIREClean product which is made and sold by FireClean LLC:

- a. The title of “Yes It’s True: FIREClean is Crisco.”
- b. “I was all but convinced: FIREClean was canola oil, commonly sold under the brand name ‘Crisco.’ Yesterday the inimitable Andrew Tuohy, a contributor to this blog, posted an article (including a link to the Spectroscopy Article) proving to me beyond any doubt that FIREClean is vegetable oil.”
- c. “[T]o the best of my knowledge, FireClean is canola oil.”
- d. “With Andrew’s spectroscopy, this has been realized (referring to the false realization that FIREClean® is repackaged canola oil)”.
- e. “FIREClean, marketed as ‘the real deal’, a revolutionary lubricant that would sweep aside all the snake oils that have plagued the gun market for years, has proved to be nothing more than canola oil at a 10,000% markup.”
- f. “Those who bought into [FIREClean®] may feel cheated, as they undoubtedly were.”
- g. “FIREClean’s reputation should suffer.”

95. The Crisco Article, its imagery, and its actionable statements explicitly and implicitly convey that FireClean is rebranded Crisco oil or otherwise rebranded common soybean or canola oil, and that FireClean dishonestly and intentionally deceived and overcharged its customers.

96. Further, some of the actionable statements in The Crisco Article demonstrate malice, extreme recklessness and/or a reckless disregard for the truth on the part of Defendants, and demonstrate an intent to use the article to damage FIREClean's reputation, such as the statements implying dishonesty and the assertion that "FIREClean's reputation should suffer."

97. By declaring that "Yes, It's True: FireClean is Crisco," The Crisco Article expounded upon, endorsed, and made statements additional to those made in the Spectroscopy Article.

98. By using its headline to declare definitively that "it's true" that "FireClean is Crisco," The Crisco Article stated that FireClean is a rebranded Crisco product; that FireClean is Canola or common soybean oil; and that FireClean was deceiving its customers. Each of these statements is demonstrably false.

99. Despite the obvious potential the publishing of The Crisco Article had to cause grave reputational harm to FireClean, The Firearm Blog made no attempt to communicate with FireClean regarding The Crisco Article, and made no attempt to receive a comment or explanation from FireClean.

100. At the time that the Spectroscopy Article was written and posted, at the time that the Crisco Article was written and posted, and at all other relevant times, FIREClean®'s patent and/or patent application were available and accessible online, describing in detail the potential composition of, and theory behind, FIREClean®.

101. Instead of undertaking to test the statements in the patent and/or patent application, the tests carried out and analyzed in the Spectroscopy Article and The Crisco Article were intended to give results that would create a sensational, "click-bait" headline, and attract viewers to the websites, all to the detriment of FireClean.

102. By using a relatively quick and utterly accurate gas chromatography-mass spectrometry (“GCMS”) test, Defendants could have accurately tested their “theories” and provided useful and truthful information to the firearm community, but failed to do so.

103. Accurate GCMS testing has been performed which proves definitively that FIREClean® has a distinct oil composition, that the statements in FIREClean®’s related patent are accurate, and that the statements and implications in The Crisco Article are provably false.

104. Instead, by utilizing a Fourier-transform infrared spectroscopy (“FTIR”) test, Defendants created, perpetuated, and relied upon a false-positive result and complied with their objective of falsely representing FIREClean and received the test results that they wanted in order to generate views and the broadest possible audience.

105. FTIR testing is a low-resolution testing method known to generate false-positives.

106. Defendants relied upon the low-resolution FTIR test to state that FIREClean® and Crisco Vegetable Oil, which is common soybean oil, were the same.

107. Alternatively, Defendants relied upon the low-resolution FTIR test to state that FIREClean® and Crisco Canola oil were the same.

108. Despite the obvious potential the publishing of The Crisco Article had to cause grave reputational harm to FireClean, upon information and belief, The Firearm Blog and/or Second Media made no attempt to consult with any individual with a technical or scientific background to determine the validity of the testing reproduced in The Crisco Article, and failed to engage in a basic critical review of that testing, which would have revealed improper scaling of the graphs, the fact that the test had revealed two substantially dissimilar control oils with very different published fatty acid levels —soybean and canola—as “the same,” and that the testing

form was not an appropriate method for confirming the similarity or identity of oils due to its high probability of false positives.

109. Defendant Fitch was warned repeatedly by technically savvy readers of The Firearm Blog upon publication that FTIR was a wholly inadequate testing method to support his conclusions.

110. Defendant Fitch not only ignored these warnings, but argued with the readers and stated or implied that he had read FIREClean®'s patent, and that FIREClean®'s patent supported his conclusions.

111. A Facebook user named "Josh Zwez" made a post on The Firearm Blog's Facebook post of The Crisco Article, telling The Firearm Blog that their science was inadequate to support their conclusions, that FIREClean®'s patent proved them wrong, and stating that "The Firearm Blog should be ashamed of not looking into this deeper." Defendant Fitch, posting as "The Firearm Blog," replied "Well I don't feel ashamed – Sorry☺"

112. Defendant White admitted in written, public comments that he knew and understood that the FTIR testing method was inadequate, and that detailed testing offered by other high-resolution testing like the GCMS method would be required to support the conclusions drawn in The Crisco Article.

113. Defendants demonstrated a reckless and utter disregard for the truth by:
- a. Using and promoting a low-resolution test to make conclusive statements of fact;
 - b. Ignoring the obvious warnings, discussed above, that the FTIR testing method was inadequate, erroneous, and likely to generate false-positive results;
 - c. Relying on testing and information provided by Mr. Tuohy, despite the information clearly available that Mr. Tuohy lacked any scientific qualifications,

educational background, or vocational background as would be necessary to enable Mr. Tuohy to adequately perform testing on oil compositions and/or to draw adequate conclusions from that testing.

- d. Failing to engage in any critical review of the testing and information provided by Mr. Tuohy, and publishing those statements, affirming their accuracy and validity with no qualification to do so, and enlarging and embellishing Mr. Tuohy's statements, and making their own statements asserting defamatory facts, as detailed above.

114. Defendants knew, or should have known, that the test results they were spreading, the statements they were publishing, and the conclusions that they were drawing from these test results and spreading, were inaccurate and false.

115. Defendants recklessly disregarded the truth, or were reckless in their disregard of whether their statements were true or not in publishing the statements identified above

116. Defendants espoused, proliferated, and spread their test results, knowing that the results were inaccurate and that their conclusions were erroneous.

117. To promote their test results and conclusions, Defendants claimed or suggested that the cited test results were definitive.

118. Upon information and belief, Mr. Touhy was formerly or currently is a staff writer for The Firearm Blog.

119. Upon information and belief, Mr. Tuohy agreed and conspired with The Firearm Blog, its writers, and/or its editors and others to spread the test results and to proliferate the false allegations against FireClean.

120. Mr. Fennell later took credit for working with others in order to encourage and help them spread the false allegations about FIREClean®.

121. Upon information and belief, Mr. Fennell, a direct competitor of FireClean, worked with Mr. Tuohy to spread the test results and to proliferate the false allegations against FIREClean® in order to damage FireClean.

122. The Crisco Article was widely read on The Firearm Blog's website and elsewhere and the article received over 500 comments on The Firearm Blog's website, such as:

- a. A user named "dshield 55" made a post, stating "I had been contemplating buying FireClean for some time, at Larry Vicker's suggestion, and I would have actually paid full price. Now I'm going to do it immediately, but use Walmart/Great value brand spray on Canola oil anyway."
- b. A user named "jeremy downs" made a post, stating "I look forward to the class action lawsuit (against FireClean)."

123. When The Firearm Blog posted The Crisco Article to its Facebook page, still entitled "Yes It's True: FireClean is Crisco," the article was "shared" and "liked" by hundreds of The Firearm Blog's Facebook followers.

124. At some point after the initial posting of The Crisco Article, The Firearm Blog changed the name of the article to "Yes, It's True: FireClean is Vegetable Oil," but the initial posting with the original title is still available on Facebook, and the article was widely read, shared, and spread with its original title. The false picture of the Crisco Vegetable Oil bottle next to the FIREClean bottle remains- falsely equating FIREClean to common soybean oil in the minds of a vast audience.

125. Followers of The Firearm Blog's Facebook page posted numerous comments and photos on The Firearm Blog's Facebook post of The Crisco Article, mocking FireClean and asserting or insinuating that the FIREClean® product is a scam.

126. The Crisco Article has been posted on various third-party gun discussion blogs and forums.

127. Shortly after its publication, The Crisco Article was shared on social media more than 17,400 times in 8 hours upon publication, and was spread at a "viral" level.

128. The ramification of the widespread falsehoods about FireClean and its product is evident not only from the sharing of The Firearm Blog's posts, but it is also apparent from third-party comments on various online retailers, including Amazon.com.

129. Prior to publication of The Crisco Article on September 13, 2015, FIREClean®'s reviews on Amazon.com were almost uniformly positive, with no reference to FIREClean® allegedly being an equivalent to Crisco

130. Yet, on September 13, 2015, the day the Crisco Article was published by The Firearm Blog, product review comments for FIREClean® turned negative.

131. Dozens of comments and reviews posted on FIREClean®'s product page demonstrate that readers literally believed The Crisco Article to be true, and to be scientifically credible and definitive. These comments and reviews have been made continuously since the initial publication of The Crisco Article, up until the present day.

132. On September 13, 2015, the initial publication date of The Crisco Article, nine negative reviews were posted about FIREClean®, giving the product a one-star rating, the lowest rating Amazon allows. The September 13, 2015 reviews are as follows:

- a. User “Sean Collins” titled a review “Over priced Crisco vegetable oil” and stated, “This is Crisco vegetable oil.”
- b. User “James R. McCain Jr.” titled a review “A sucker born every minute” and stated, “Fire lean is nothing more than canola oil. Crisco, Wesson Oil.”
- c. User “M. Potter” posted a review stating, “I had two 4 ounce bottles of Pure Rapeseed Oil courtesy of the great people at Fire Clean LLC, and it only cost me \$31.49...[t]he banana bread turned out great.”
- d. User “Shawn Cathcart” posted a review titled, “Warning to consumers regarding FIREClean Gun Oil.” The review stated “Warning to consumers: An Infrared Spectroscopy test has proven that FireClean Gun Oil is ‘...a modern unsaturated vegetable oil virtually the same as many oils used for cooking.’”
- e. User “John Freckleson” posted a review titled, “FRAUD.” The review stated, “Recently the product has been chemically analyzed and has been revealed to be rebranded Crisco vegetable oil.”
- f. User “John4315” posted a review titled, “Crisco repackaged and mared up enormously” and stated, “This product has been exposed as nothing but cooking oil. You can get the same results for about 125 times less here.
[http://www.amazon.com/Crisco-Pure-Canola-Oil-48/dp/B00I8G79ES.](http://www.amazon.com/Crisco-Pure-Canola-Oil-48/dp/B00I8G79ES)”
- g. User “Charles W. Story” posted a review quoting The Crisco Article verbatim.
- h. User “robert dorchak” posted a review titled, “Crisco is better.” The review stated, “Shout out to all you fire clean fan boys that have been using Crisco to lube your guns for the past year.”

- i. User “Hodor” posted a review titled, “One Star” and stated, “Great oil but too expensive for daily cooking unless you’re sponsored by them, which explains Larry Vickers’ weight.”

133. Many of these posts and unverified reviews got dozens or hundreds of “likes.”

134. Much of FireClean’s product sales occur over the internet, and Amazon is the largest online marketplace.

135. Because of The Crisco Article, when users of Amazon go to the product page for FIREClean®, they are greeted with an abundance of negative reviews about FIREClean®, including false claims that FIREClean® is merely common soybean or canola oil, that FIREClean® is repackaged Crisco Canola Oil or Crisco Vegetable (soybean) Oil, and multiple posts claiming or implying that the FIREClean® product is a scam. Each of these reviews was inspired and caused directly by The Crisco Article.

136. The negative, one-star reviews about FIREClean® continued to be posted on Amazon up through the end of August 2017.

137. Online reviews and comments about FIREClean® and FireClean confirm that the articles and comments made by The Firearm Blog damaged Plaintiff’s reputation.

138. Because Defendants wrote and posted this false article about FIREClean®, FireClean’s revenues and profits have decreased steadily since September 2015.

139. FireClean’s future revenues and profits will be lower than they would have been because Defendants wrote and published these derogatory articles.

140. After The Firearm Blog published The Crisco Article, FireClean’s revenues fell by over \$25,000.00 per month.

141. The Crisco Article is still currently posted on The Firearm Blog's website, and is the second result to appear when searching for "FIREClean" via the Google search engine.

142. Defendants' creation, endorsement, and proliferation of the false Crisco Article, the incorporated test results statements, and related comments made by Defendants concerning FIREClean® were used to draw attention and drive traffic to The Firearm Blog and its related social media accounts, in order that The Firearm Blog could sell more advertising space, all to the detriment of Plaintiff.

**COUNT I – FALSE ADVERTISING IN
VIOLATION OF 15 U.S.C. § 1125(a)(1)(B) (Lanham Act)**

143. Plaintiff re-alleges and incorporates herein by reference, as though more fully set forth herein, all allegations contained in the above-numbered paragraphs.

144. FireClean markets FIREClean® to gun owners and people who use gun oil.

145. The Firearm Blog markets itself to gun owners and people who use gun oil, and makes advertising money based on the number of viewers it attracts.

146. The Firearm Blog and/or Second Media make advertising money by selling advertising space on The Firearm Blog website to various manufacturers and distributors of firearms and firearm accessories.

147. Upon information and belief, The Firearm Blog and/or Second Media have cooperated and conspired with Mr. Fennell and/or Steel Shield Technologies, Inc., direct competitors of FireClean, either directly or otherwise coordinated through Mr. Tuohy and others.

148. Upon information and belief, The Firearm Blog and/or Second Media have cooperated and conspired with Mr. Tuohy, a former and possibly current contributor to The Firearm Blog.

149. Defendants, through their business dealings, and FireClean, through its business dealings, compete against one another to gain commercial advantages in interstate commerce, each vying for the attention and for a consumer relationship with individuals in the diverse community of gun and weapon owners, gun oil users, retailers, members of the military, and gun aficionados.

150. The Firearm Blog and/or Second Media sell ad space and sponsorships to companies involved in commerce in the firearm community, including dealers and distributors who are competitors of FireClean, and who sell competing gun oil products.

151. Defendant The Firearm Blog and/or Second Media, and Individual Defendants White, Fitch, and Johnson published The Crisco Article and The Crisco Article Statements online, causing each to appear on www.thefirearmblog.com, and also on related media sites, such as Facebook.

152. By publishing The Crisco Article, Defendants wrote and published false and derogatory statements about FireClean and FIREClean® on The Firearm Blog's website so that each would be portrayed in a false and negative light in the marketplace.

153. By publishing The Crisco Article Statements, Defendants deceived their audience and promoted false and misleading information about FireClean.

154. The Crisco Article Statements described specific or absolute characteristics of FIREClean®, and/or included specific, measurable claims of product superiority, product characteristics, and product nature based on product testing and based on allegedly scientific and accurate testing.

155. Each of The Crisco Article Statements were either literally false as a factual matter, or the statements were ambiguous but implicitly conveyed a false impression, were misleading in context, and were likely to deceive consumers.

156. The Crisco Article Statements were made maliciously, with a reckless disregard of the truth, and/or without regard to whether they were true or not.

157. Comments posted on The Firearm Blog's website, Facebook, Amazon, and numerous other firearm related blogs and media sites demonstrate that consumers have been deceived by The Crisco Article.

158. Defendants published the false and derogatory Crisco Article Statements about FireClean and FIREClean® via The Firearm Blog's website, and other media sites such as Facebook, to help them market their website, to help them market their social media sites, to promote themselves, to sell additional advertising space, and to profit, through their relationship with Mr. Fennell or otherwise.

159. Defendants chose the title "Yes it's True: FireClean is Crisco," an objectively false and defamatory "click-bait" headline, in order to attract more viewers to their website and to increase the number of "likes," "shares," and re-postings The Crisco Article would receive across a range of media properties operated by Defendants, as well as media properties Defendants are associated or partnered with.

160. Defendants created and posted an image of an enlarged bottle of FIREClean® next to a bottle of Crisco Vegetable Oil in The Crisco Article in order to attract more buzz to The Crisco Article and to increase the number of "likes," "shares," and re-postings The Crisco Article would receive.

161. Defendants utilized false click-bait headlines and posted false and defamatory statements and images about FireClean in order to attract attention to their website; to attract attention to their other media properties and associated or partner entities; to increase their visibility, good will, and influence amongst the gun community; and to subsequently use that influence and visibility to sell subscriptions and/or additional advertising space to firearm and firearm accessory companies, as well as dealers or distributors of the same.

162. Defendants' use of false, "click-bait" headlines and imagery was successful, causing The Crisco Article to go viral, to be widely shared through social media, and to be shared and spread online to a far greater extent than the average article posted on The Firearm Blog.

163. By doing so, Defendants damaged FireClean's visibility, good will, and influence in the gun community, damaging FireClean's ability to market itself and sell its product to its target community.

164. By using an objectively false headline and posting false and misleading statements about FireClean in order to attract viewers to their website and make more advertising money, Defendants made false statements of fact in a commercial advertisement about FireClean's product.

165. By conspiring with Mr. Fennell, whether directly or through Mr. Tuohy, to spread and promote false information about FireClean in order to damage FireClean to the advantage of Steel Shield Technologies, Defendants made false statements of fact in a commercial advertisement about FireClean's product.

166. Defendants, by publishing false and derogatory stories about FireClean and FIREClean® to help them market their website and/or to advance the interests of Mr. Fennell:

- a. Decreased the value of the goodwill FireClean had accumulated before September 13, 2015; and
- b. Decreased the return on investment FireClean made or will make on money it spent on marketing its brand and its FIREClean® product.

167. The Crisco Article Statements deceived or had the tendency to deceive a substantial segment of the audience of the article.

168. By publishing The Crisco Article Statements online, Defendants caused the false and misleading statements to enter interstate commerce

169. Defendants' deception damaged FireClean's position in the marketplace.

170. Because readers of The Firearm Blog believed The Crisco Article Statements, Defendants harmed FireClean and FIREClean®'s reputations by casting aspersions on FireClean's business and by equating FIREClean® with an inferior product, Crisco oil.

171. Defendant's deception caused FireClean to lose no less than \$400,000; in addition, FireClean's future losses based on Defendant's deception will be in the millions.

WHEREFORE, Plaintiff FireClean requests the Court enter judgment in their favor and against Defendants The Firearm Blog and/or Second Media; Fitch; White; and Johnson in a sum in excess of \$25,000.00, together with applicable interest, for punitive damages, and for costs and expenses incurred herein, and for such other and further relief as this Court may deem just and proper in these circumstances.

COUNT II - DEFAMATION AGAINST DEFENDANT NATHANIEL FITCH

172. Plaintiff re-alleges and incorporates herein by reference, as though more fully set forth herein, all allegations contained in the above-numbered paragraphs.

173. Defendant Fitch authored The Crisco Article.

174. The Crisco Article includes the actionable Crisco Article Statements.

175. The Crisco Article Statements are false.

176. Defendant Fitch authored The Crisco Article Statements without taking any steps to verify the truth of the matters asserted therein.

177. Defendant Fitch failed to contact FireClean or the Sugg Brothers in any way, despite the obvious risk that writing and publishing The Crisco Article could and would cause great reputational harm to FireClean.

178. Defendant Fitch made no effort to critically review or independently verify the adequacy of the FTIR testing results before he stated and caused to be published definitive, erroneous conclusions derived entirely from those results.

179. Upon information and belief, Defendant Nathaniel Fitch wrote The Crisco Article hurriedly in order to attend an out-of-town wedding.

180. Defendant Fitch published the article under a “short, sweet” headline because he knew would be sure to have maximum impact to his intended audience—and make that audience as large as possible.)

181. Defendant Fitch submitted his work to his editor, Defendant White, in Missouri for review and approval prior to publication.

182. Defendant Fitch knew that The Crisco Article Statements were false, had no reason to believe they were true, and/or acted with reckless disregard as to whether they were true or false at a time when he had, or should have had serious doubts that they were true.

183. Defendant Fitch intended to publish The Crisco Article Statements and did cause The Crisco Article Statements to be published.

184. Shortly after its publication, The Crisco Article was shared on social media more than 17,400 times in 8 hours upon publication.

185. The Crisco Article states, “FIREClean’s reputation should suffer”

186. When faced repeatedly with criticisms of his article by technically savvy readers and information that FTIR was a wholly inadequate testing method to support the conclusions drawn by Defendant Fitch in The Crisco Article, Defendant Fitch ignored these warnings and argued with the readers, persisted in defending the article, and alleged that FIREClean®’s patent supported his conclusions.

187. Defendant Nathaniel Fitch intended to harm FireClean’s reputation to the broadest audience and maximum extent possible.

188. Publication of The Crisco Article Statements did harm FireClean’s reputation.

189. FireClean has suffered damage due to the publication of the Crisco Article Statements that includes, but is not limited to, substantial lost sales, loss of good will, and stifled future growth.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment, in an amount in excess of \$25,000.00, in its favor and against Defendant Nathaniel Fitch, plus Plaintiff’s costs and expenses incurred herein, punitive damages, and such other and further relief as the Court may deem just and proper under the circumstances.

COUNT III - DEFAMATION AGAINST DEFENDANTS
THE FIREARM BLOG, SECOND MEDIA, PHILLIP WHITE, AND STEVE JOHNSON

190. Plaintiff re-alleges and incorporates herein by reference, as though more fully set forth herein, all allegations contained in the above-numbered paragraphs.

191. Defendant The Firearm Blog and/or Second Media, and Individual Defendants White and Johnson, knew or should have known that The Crisco Article Statements were false,

had no reason to believe they were true, and/or acted with reckless disregard as to whether they were true or false at a time when they had or should have had serious doubts that they were true.

192. Defendant The Firearm Blog and/or Second Media, and Individual Defendants White and Johnson, intended to publish The Crisco Article Statements and did cause The Crisco Article Statements to be published.

193. Defendant The Firearm Blog and/or Second Media, and Individual Defendants White and Johnson, published The Crisco Article Statements without taking any steps to verify the truth of the matters asserted therein.

194. Defendant The Firearm Blog and/or Second Media, and Independent Defendants White and Johnson, made no attempt to contact FireClean for a comment or explanation prior to publishing the article, despite the enormous and obvious potential that publication of The Crisco Article would cause grave reputational harm to FireClean.

195. Defendant The Firearm Blog and/or Second Media, and Individual Defendants White and Johnson, intended to harm FireClean's reputation.

196. Publication of The Crisco Article Statements did harm FireClean's reputation.

197. FireClean has suffered damage due to the publication of The Crisco Article Statements that includes, but is not limited to, substantial lost sales, loss of goodwill, and stifled future growth.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment, in an amount in excess of \$25,000.00, in its favor and against Defendant The Firearm Blog and/or Second Media, and Individual Defendants White and Johnson, plus Plaintiff's costs and expenses incurred herein, punitive damages, and such other and further relief as the Court may deem just and proper under the circumstances.

COUNT IV – INJURIOUS FALSEHOOD AGAINST ALL DEFENDANTS

198. Plaintiff re-alleges and incorporates herein by reference, as though more fully set forth herein, all allegations contained in the above-numbered paragraphs.

199. In publishing The Crisco Article Statements about FireClean and its product, Defendants White, Fitch, Johnson, and The Firearm Blog and/or Second Media intentionally made disparaging and false statements about FireClean to a vast, third-party audience.

200. The Crisco Article Statements disparaged FireClean by alleging or implying that they are unethical and untrustworthy.

201. The Crisco Article Statements disparaged FIREClean® by alleging or implying that FIREClean® is made of common soybean oil or common canola oil, that FIREClean® is a rebranded Crisco cooking oil, that FIREClean® is a scam, and that FIREClean® is not worth its sale price and should be sold for 1/100th of its price.

202. FIREClean® is not repackaged Crisco oil, common canola oil, or common soybean (“Vegetable”) oil.

203. FireClean has not lied to or misled consumers about FIREClean®’s composition or its applications.

204. The Crisco Article Statements nevertheless state or imply that Plaintiff lied to or otherwise deceived customers.

205. Defendants intended that the publication of the false Crisco Article Statements would injure FireClean, or recognized or should have recognized that publication of The Crisco Article Statements were likely to injure FireClean

206. Defendants, when they wrote and/or published The Crisco Article Statements, knew or should have known that the disparaging statements were false, or acted in reckless disregard of their truth or falsity.

207. Defendants were motivated to publish The Crisco Article Statements out of their own self-interest and their desire to dissuade consumers from doing business with Plaintiff.

208. The Crisco Article Statements caused Plaintiff pecuniary losses, including but not limited to lost sales, loss of customers' business, loss of good will, loss of value of intellectual property belonging to the company, and loss of company value.

209. Numerous consumers and potential consumers of FIREClean® saw and believed The Crisco Article Statements.

210. Readers of The Crisco Article understood the statements in the article as casting doubt on FireClean's trustworthiness, and on the quality of FIREClean®.

211. The Crisco Article Statements were published with malice or evil motives towards FireClean.

WHEREFORE, Plaintiff FireClean requests the Court enter judgment in their favor and against Defendants The Firearm Blog and/or Second Media; Fitch; White; and Johnson in a sum in excess of \$25,000.00, together with applicable interest, for punitive damages, and for costs and expenses incurred herein, and for such other and further relief as this Court may deem just and proper in these circumstances.

**COUNT V – INTENTIONAL INTERFERENCE WITH
BUSINESS EXPECTANCY AGAINST ALL DEFENDANTS**

212. Plaintiff re-alleges and incorporates herein by reference, as though more fully set forth herein, all allegations contained in the above-numbered paragraphs.

213. Prior to September 2015, FireClean was actively engaged in sales of FIREClean®.

214. FireClean had prospective and actual contracts and business expectancies with individual consumers, small retail operations, dealers, government agencies, and larger retailers such as Amazon.com. These consumers and dealers include those in Missouri and elsewhere.

215. Defendants White; Fitch; Johnson; and The Firearm Blog and/or Second Media were aware of FireClean's contracts and business relationships.

216. For example, Defendants knew of FireClean's business relationship with Larry Vickers of Vickers Tactical, with whom FireClean's managers had made a demonstration video published on YouTube.

217. Defendants intentionally interfered with FireClean's contractual and business relationships when they improperly wrote and published the false and disparaging Crisco Article Statements.

218. Defendants actively sought to dissuade current, former, and prospective customers of all types from purchasing FIREClean®.

219. Comments to The Firearm Blog's published articles, The Firearm Blog's Facebook posts, and FIREClean®'s product page on Amazon indicate that current, former, and prospective customers read The Crisco Article's disparagements and decided not to purchase FIREClean®.

220. Defendants knew that The Crisco Article Statements were false before they made them, or were reckless in their disregard of whether their statements were true or not.

221. Defendants did not make their statements in the best interests of anyone other than themselves.

222. Defendants lacked any justification for publishing and spreading false and misleading information about FireClean and its product.

223. Upon information and belief, Defendants likely made some of their statements whether directly or indirectly at the direction or suggestion of one of FireClean's competitors, Mr. Fennell, who took credit for starting the false rumors about FireClean.

224. Numerous consumers and retailers read The Crisco Article Statements and reasonably noted their cautions against FireClean and its product.

225. Prior to Defendants' publication of The Firearm Blog, reviews of FireClean on places such as Amazon.com had been overwhelmingly positive.

226. Since the publication of The Crisco Article Statements, FIREClean® has received over 40 single-star reviews, the lowest review status Amazon allows, many of which are "unverified" by Amazon.

227. The Firearm Blog and/or Second Media broke its promises to comply with the terms of use agreements, user agreements, acceptable use policies, community standards, or other similar standards of conduct for Facebook, Google+, Instagram, and Twitter users when it engaged in tortious conduct that gave rise to this civil action.

228. The Firearm Blog and/or Second Media engaged in improper conduct when it broke its promises to comply with the terms of use agreements, user agreements, acceptable use policies, community standards, or other similar standards of conduct for Facebook, Google+, Instagram, and Twitter users.

229. As previously described, Defendants' actions caused FireClean economic and noneconomic damages.

WHEREFORE, Plaintiff FireClean requests the Court enter judgment in their favor and against Defendants The Firearm Blog and/or Second Media; Fitch; White; and Johnson in a sum in excess of \$25,000.00, together with applicable interest, for punitive damages, and for costs and expenses incurred herein, and for such other and further relief as this Court may deem just and proper in these circumstances.

COUNT VI – CIVIL CONSPIRACY AGAINST ALL DEFENDANTS

230. Plaintiff re-alleges and incorporates herein by reference, as though more fully set forth herein, all allegations contained in the above-numbered paragraphs.

231. As described in this Complaint, Defendants White, Fitch, Johnson, and The Firearm Blog and/or Second Media combined, associated, agreed, mutually undertook, and concerted together and, upon information and belief, with others for the purpose of spreading false information about FIREClean®, and for the purpose of willfully and maliciously injuring FireClean in its reputation, trade, and business by defaming the company.

232. Defendants acted through a mutual plan and undertaking, with a meeting of the minds on the course and object of their actions, to defame FireClean with The Crisco Article.

233. Upon information and belief, Defendants acted in concert with a former and/or current contributor to The Firearm Blog, Mr. Tuohy, and others to spread the slanderous and erroneous test results and conclusions published in The Crisco Article.

234. Upon information and belief, Defendants and/or Mr. Tuohy conspired with Mr. Fennell, a direct competitor of FireClean and the originator of the false allegations about FireClean, to spread the allegations and related erroneous test results alleging that FIREClean® is rebranded Crisco oil.

235. Defendants, as described above, acted intentionally, purposefully, and without lawful justification to injure FireClean.

236. By spreading, propagating, and promoting false information and erroneous and misleading test results, the conspirators took unlawful acts to defame and damage FireClean.

237. As a proximate result of Defendants' concerted and malicious actions, FireClean has been damaged in its business, reputation, and trade.

238. FireClean has suffered substantial damages, including but not limited to lost sales, lost revenues, lost profits, and severe injury to its reputation and goodwill.

239. Defendants' actions were willful, malicious, and intended to harm FireClean.

240. FireClean is entitled to an award of damages against Defendants, including compensatory damages and lost profits, attorneys' fees, costs, and punitive damages, and further relief as the Court deems appropriate.

WHEREFORE, Plaintiff FireClean requests the Court enter judgment in their favor and against Defendants The Firearm Blog and/or Second Media; Fitch; White; and Johnson in a sum in excess of \$25,000.00, together with applicable interest, for punitive damages, and for costs and expenses incurred herein, and for such other and further relief as this Court may deem just and proper in these circumstances.

Respectfully submitted,

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General Information

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