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Via Email

Examining Doug Wilson & Moscow
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Re: Christ Church and Pastor Douglas Wilson

To the administrators of *Examining Doug Wilson & Moscow*:

As you know, our firm is defamation counsel to Christ Church of Moscow, Idaho. We have thoroughly reviewed, analyzed, and archived hundreds of social-media posts on Facebook, Instagram, and X pages you administer (collectively, “*Examining Doug Wilson*”). It hardly bears stating that nearly all of them—and, really, your webpages as a whole—are actionably defamatory. In particular, your “reporting” on alleged sexual abuses at Christ Church and Logos School is littered with falsehoods and, in some cases, complete fabrications. And, having conspired with media outlets and reporters bent on destroying Christ Church, you acted with actual malice. Any doubt as to your malice is resolved by the fact that you insist on posting anonymously, cowering away from your own claims. Given the sheer volume of maliciously defamatory posts—and the fact that your very existence is devoted to defaming Christ Church and Pastor Douglas Wilson—we see no path to reconciliation except for you to summarily retract all your posts and to cease operating.¹

For over ten years, you have harassed our clients, dredging up—and in some cases, outright manufacturing—false reports of every variety. Your mission has never been to uncover or expose truth; it has been to destroy Pastor Wilson and anyone affiliated with him.² This has enslaved you

¹ This letter constitutes a retraction demand under all applicable law, as to every statement on your websites regarding or related to Pastor Wilson, Christ Church, Logos School, any member of Pastor Wilson’s family, and any other person affiliated with Pastor Wilson.

Because you have written at great length about Christ Church’s retention of Clare Locke LLP, we fully anticipate that you may publish this letter. If you choose to do so, however, we demand that you post it in its entirety.

² This includes even Ms. Locke. Upon learning of Christ Church’s retention of our firm, you attacked her personally in several X posts, stating, among other things, “Perhaps Doug Wilson will hand Libby Locke an apron and explain to her what he expects of her.” Examining Doug Wilson, X (Jan. 9, 2024),

to a preconceived, false narrative regarding your enemies.³ And it has resulted in immense damage spanning several years.

While the full scope of your defamatory reporting is nearly impossible to catalogue, four specific accusations are particularly egregious.⁴ First, since Saturday, February 10, 2024, you have repeatedly accused a sophomore basketball player for Logos School of sexually assaulting other players. You have posted on the subject over 40 times, stating directly that this player has committed several crimes.⁵ But video footage—including the very footage on which your false accounts rest—demonstrates that the physical contact in question was completely incidental and that your characterizations of it are baseless. You similarly go to great lengths to connect this manufactured scandal with Christ Church and Pastor Wilson, writing that “[u]nwanted sexual touching seems to be a feature not a bug in the organizations (such as Logos, and others) that are affiliated with Doug Wilson.”⁶ This, too, is actionably false. Needless to say, neither Pastor Wilson nor Christ Church has anything to do with Logos players’ garden-variety rebounding techniques. And both entities categorically, publicly condemn sexual harassment of every variety.

Second, *Examining Doug Wilson* has accused Pastor Wilson of covering up sexual assault against Emilie Paige Dye. He did no such thing. The teacher who abused Ms. Dye was fired from Logos and removed as a Christ Church elder within days of the discovery of an unprofessional online message. When, two years after the fact, Pastor Wilson and Logos learned for the first time that the relationship between the student and teacher may have involved illegal contact, it was Pastor Wilson himself who reported it to law enforcement. And even then, Ms. Dye categorically denied any potentially illegal contact to police.

You knew this was the case when you published your accusations. Indeed, *Examining Doug Wilson* has plainly acknowledged that Ms. Dye’s teacher was fired as soon as evidence of an

<https://twitter.com/ExaminingMoscow/status/1744752563218436191>. Your condescension speaks for itself. Doubly so, given that *Examining Doug Wilson* holds itself out as an advocate for women. Suffice it to say, as an accomplished trial lawyer and a founder of the most important defamation law firm in the country—not to mention a proud wife and mother—Ms. Locke is perfectly capable of advocating for herself and her clients without your help or protection. And, as you know from his myriad writings on the topic, Pastor Wilson celebrates the achievements of women within and outside the home. See, e.g., Douglas Wilson, *Thanksgiving Leftovers*, Blog & Mablog (Nov. 27, 2023), <https://dougwils.com/books-and-culture/s7-engaging-the-culture/a-miscellany.html> (praising women in Pastor Wilson’s family for writing books, “teaching seminars,” “running successful podcasts,” and “featuring in documentaries”). To use Pastor Wilson’s words, if he is a misogynist, he is “the worst misogynist ever.” *Id.* Your implication otherwise is false and defamatory.

³ See, e.g., *Harris v. City of Seattle*, 152 Fed. App’x 565, 568 (9th Cir. 2005) (“[E]vidence that a defendant conceived a story line in advance of an investigation and then consciously set out to make the evidence conform to the preconceived story is evidence of actual malice, and may often prove to be quite powerful evidence.”); *Celle v. Filipino Reporter Enterprises Inc.*, 209 F.3d 163, 183 (2d Cir. 2000) (“Evidence of ill will combined with other circumstantial evidence indicating that the defendant acted with reckless disregard of the truth or falsity of a defamatory statement may also support a finding of actual malice.”).

⁴ Our listing of these four lies should not be construed to exclude the rest of your defamatory assertions.

⁵ See, e.g., *Siercke v. Siercke*, 476 P.3d 376, 386–87 (Idaho 2020) (statements are defamatory *per se* when they falsely impute criminal conduct that is either punishable by imprisonment in any state or federal institution or involves moral turpitude); *Irish v. Hall*, 416 P.3d 975, 982 (Idaho 2018) (“a statement may be defamatory *per se* if it alleges a person has engaged in conduct constituting a criminal offense”); Restatement (Second) of Torts § 571 (1977) (accusations of a crime constitute defamation *per se*).

⁶ *Examining Doug Wilson & Moscow*, Idaho, Facebook (Jan. 31, 2023), https://www.facebook.com/watch/?v=506849911564682&extid=CL-UNK-UNK-UNK-IOS_GKOT-GKIC&ref=sharing.

inappropriate relationship came to light; that Pastor Wilson himself informed law enforcement as soon as he (or anyone at Logos) became aware of any sexual, physical contact; and that the police concluded that any such physical contact occurred after the student was an adult.⁷ It appears from numerous X posts⁸ that you reviewed a 2017 police report detailing all of this and therefore knew the full, true accounting of Ms. Dye’s situation. Your knowledge of these facts demonstrates that your lies were not accidental; instead, they were made with actual malice.⁹

Third, *Examining Doug Wilson* republished accusations that Pastor Wilson and his wife, Nancy Wilson, pried into the sex lives of minors at Logos School.¹⁰ This, too, is demonstrably untrue. The only inquiries the Wilsons have ever made into anyone’s sexual relationships are those that are necessary to protect the health and wellbeing of their students and parishioners. Moreover, had Pastor Wilson failed to inquire appropriately into whether sexual misconduct had occurred in these instances, you would no doubt accuse him of treating that misconduct with insufficient urgency and engaging in a “coverup.” That is precisely what you have accused Pastor Wilson of doing with respect to Ms. Dye.¹¹ There, you chastise Pastor Wilson for not inquiring enough; yet, when he inquires elsewhere, you accuse him of voyeurism.

Fourth, you mischaracterize Pastor Wilson’s theological positions on sexual morality and marriage. *Examining Doug Wilson* repeatedly writes that Pastor Wilson’s teachings “encourage[] marital rape.”¹² Despite some recent statements that Pastor Wilson’s teachings merely “encourage” or “set[] up conditions for marital rape to occur,”¹³ your implication is intentional and plain: that Pastor Wilson’s doctrinal teachings permit—indeed, *encourage*—marital rape.¹⁴ The truth is precisely

⁷ See, e.g., @ExaminingMoscow, X (Dec. 1, 2023), <https://x.com/ExaminingMoscow/status/1730684001508024579?s=20>.

⁸ See, e.g., @ExaminingMoscow, X (Dec. 12, 2023), <https://x.com/ExaminingMoscow/status/1734621292270059776?s=20> (stating falsely that “[w]hat Doug Wilson says differs greatly from the witness testimonies, police reports, court documents and sworn affidavits” in response to a post concerning allegations against Jim Nance, among others); @ExaminingMoscow, X (Dec. 1, 2023) <https://x.com/ExaminingMoscow/status/1730684492753277117?s=20> (responding to a post indicating that the “police concluded that the immoral behavior occurred after she turned 18,” demonstrating awareness of the contents of the police report); @ExaminingMoscow, X (Nov. 17, 2023), <https://x.com/ExaminingMoscow/status/1725524866789470373?s=20> (responding to a post discussing key details of the police report, showing that you were aware of the contents of the report).

⁹ See *Goldwater v. Ginzburg*, 414 F.2d 324, 337 (2d Cir. 1969) (ignoring contradictory evidence in pursuit of a preconceived storyline is evidence of actual malice); *Eramo v. Rolling Stone, LLC*, 209 F. Supp. 3d 862, 872–76 (W.D. Va. 2016) (“[E]vidence that a defendant conceived a story line in advance of an investigation and then consciously set out to make the evidence conform to the preconceived story is evidence of actual malice.”).

¹⁰ See @ExaminingMoscow, X (Oct. 25, 2023), <https://x.com/ExaminingMoscow/status/1717207286475575586?s=20>.

¹¹ @ExaminingMoscow, X (Nov. 11, 2023), <https://x.com/ExaminingMoscow/status/1723537469344239622?s=20> (falsely accusing Pastor Wilson of engaging in a “cover-up of James Nance’s sexual abuse of Emilie Paige”).

¹² @ExaminingMoscow, X (Sept. 18, 2022), <https://x.com/ExaminingMoscow/status/1571701786880131073?s=20>; @ExaminingMoscow, X (Dec. 2, 2023), <https://x.com/ExaminingMoscow/status/1731011318126158142?s=20>; @ExaminingMoscow, X (May 19, 2022), <https://x.com/ExaminingMoscow/status/1527378814250012685?s=20>; @ExaminingMoscow, X (Nov. 8, 2022), <https://x.com/ExaminingMoscow/status/1590036525504659456?s=20>; @ExaminingMoscow, X (Aug. 8, 2022), <https://x.com/ExaminingMoscow/status/1556695546181582848?s=20>.

¹³ @ExaminingMoscow, X (Dec. 2, 2023), <https://x.com/ExaminingMoscow/status/1731011318126158142?s=20>; @ExaminingMoscow, X (Sept. 18, 2022), <https://x.com/ExaminingMoscow/status/1571701786880131073?s=20>.

¹⁴ *Celle v. Filipino Reporter Enterprises, Inc.*, 209 F.3d 163, 177–78 (2d Cir. 2000) (“It is the meaning reasonably attributable to the intended reader that controls.”).

the opposite: Pastor Wilson condemns sexual assault, including marital rape, in the strongest possible terms. Once again, you published these statements with actual malice, knowing that Pastor Wilson’s teachings categorically condemn marital rape. Many of your posts cite Pastor Wilson’s book, *Fidelity*,¹⁵ which contains a forceful screed against the pervasiveness of rape and “rape fantasies” in contemporary culture.¹⁶ That passage lies mere pages away from a quote you frequently refer to as proof of your ludicrous claims. It beggars belief that, given your obsessive fixation on Pastor Wilson, you failed to read the book in its entirety. You thus knew that your representations of Pastor Wilson’s positions were false. You made them anyway, out of contempt.

You refuse to attach your own names to your propaganda. But your anonymity will not protect you forever. You have implored “victims” to contact you for “legal recommendations,”¹⁷ apparently without realizing that civil or criminal legal proceedings involving *Examining Doug Wilson* would subject all of you and your coconspirators to unmasking (not to mention potential liability). It would take very little effort for a litigant to subpoena X, Meta, Google, GoDaddy, and any other host to retrieve your real names, IP addresses, and contact information.¹⁸ And, because *Examining Doug Wilson* is not incorporated and is not a limited-liability entity, each of your authors and administrators is individually, fully liable for all of the site’s content.¹⁹

I. *Examining Doug Wilson* has falsely accused a student at Logos School of sexual assault.

The latest manufactured controversy at Logos School has pulled you to new depths: attacking a high-school sophomore and accusing him of criminal sexual misconduct. Under the heading, “Are the Logos Knights basketball players from Moscow, Idaho inappropriately grabbing the genitals of opposing players in order to gain an advantage?,” you write that a Logos basketball player—who you have expressly identified²⁰—“was witnessed grabbing the genitals of the players of the opposing team.”²¹ You then reproduce in full an Idaho criminal statute regarding sexual battery. You instruct “concerned parents” to contact the Idaho High School Activities Association, “a lawyer specializing in sexual assault/battery,” and local media. You then link to a defamatory Change.org petition

¹⁵ E.g., @ExaminingMoscow, X (Aug. 13, 2022), <https://x.com/ExaminingMoscow/status/1558434445375447042?s=20>.

¹⁶ Douglas J. Wilson, *Fidelity* 89 (Canon Press 2012); see also Pastor Douglas Wilson, *Fifty Shades of Prey*, Huffpost (July 22, 2012), https://www.huffpost.com/entry/fifty-shades-women_b_1693138/amp.

¹⁷ @ExaminingMoscow, X (Jan. 27, 2024), <https://x.com/ExaminingMoscow/status/1751244762781208829?s=20>.

¹⁸ See, e.g., *hey, inc. v. Twitter, Inc.*, 2023 WL 3874022, at *7 (N.D. Cal. June 6, 2023) (ordering disclosure of anonymous user’s identity in defamation action); *Bloomberg, L.P. v. John Does 1-4*, 2013 WK 4780036, at *2-3 (S.D.N.Y. June 26, 2013); *AmerisourceBergen Corp. v. Does*, 81 A.3d 921 (Pa. Super. 2013) (permitting disclosure of identity of anonymous posters); see also *Proxima Beta Pte Limited v. Martin*, 2021 WL 4776703 (C.D. Cal. Apr. 20, 2021); *Xcentric Ventures, LLC v. Arden*, 2010 WL 424444 (N.D. Cal. Jan. 27, 2010).

¹⁹ See, e.g., *Fast v. Kahan*, 481 P.2d 958 (Kan. 1971) (holding individual member liable for the acts of association); *Weese v. Stoddard*, 312 P.2d 545, 547 (N.M. 1956) (“The members of an unincorporated association are liable for the torts committed by the association’s agent”); *Golden v. Wilder*, 4 S.W.2d 140, 143-44 (Tex. Ct. App. 1928) (holding individual members of non-profit association individually liable for torts of the association).

²⁰ Your X post links to a January 31, 2023, Facebook post in which you write that the student “has the same last name as the assistant coach.” *Examining Doug Wilson & Moscow, Idaho*, Facebook (Jan. 31, 2023), https://www.facebook.com/watch/?v=506849911564682&extid=CL-UNK-UNK-UNK-IO5_GKOT-GKIC&ref=sharing; see also @ExaminingMoscow, X (Feb. 10, 2024), <https://twitter.com/ExaminingMoscow/status/1756505422976971263> (linking to same).

²¹ *Examining Doug Wilson & Moscow, Idaho*, Facebook (Feb. 11, 2024), https://www.facebook.com/story.php?story_fbid=410368734838422&id=100075958973541.

containing the same false accusations.²² You quickly repeated these statements on X,²³ republishing²⁴ a Facebook post that claims the player “grabb[ed]” his opponent “by the crotch and then lift[ed] him with a closed hand, violently enough to lift him up and his shorts up.”²⁵ The same post claims to be based on live footage of the incident, footage that you have either reviewed or intentionally ignored in republishing this claim.²⁶

All footage of the interactions to which you refer shows that your accounts are false. High-resolution footage of one skirmish shows, at most, a fraction of a second of contact between the alleged assailant and another player.²⁷ The other interaction—during which the Logos player is alleged to have “grabb[ed]” his opponent “by the crotch and then lift[ed] him with a closed hand”—similarly involved only passing contact.²⁸ In fact, even the specific footage on which that claim was based²⁹ shows that player pulling his arm free from his opponent. The conduct you label assaultive is no more invasive or less incidental than is routine in high-school, college, and professional basketball.³⁰ Moreover, your posts clearly and repeatedly accuse the player of committing a crime. You cite specific criminal statutes you allege the student violated, and you invite parents and others to contact attorneys specializing in sexual assault.³¹ In addition to being false and highly damaging, your posts are thus actionably defamatory.³²

Your mischaracterizations of this event were not accidents. They were the latest in a years-long string of attacks against anyone related to Pastor Wilson, Christ Church, and Logos School. Moreover, the Facebook post you republished claims to be based on footage that simply does not show what you say it does.³³ In republishing the post, you either reviewed that footage for yourselves or failed to investigate a claim that was too good to be fact-checked. In either event, your posts were

²² Examining Doug Wilson & Moscow, Idaho, Facebook (Feb. 11, 2024), https://www.facebook.com/story.php?story_fbid=410368734838422&id=100075958973541.

²³ @ExaminingMoscow, X (Feb. 10, 2024), <https://twitter.com/ExaminingMoscow/status/1756504591007412329>.

²⁴ See Restatement (Second) of Torts § 578 (“[O]ne who repeats or otherwise republishes defamatory matter is subject to liability as if he had originally published it.”).

²⁵ Robert Millage, Facebook (Feb. 10, 2024), <https://www.facebook.com/1593142397/posts/pfbid0Z9r96xUxZEyhyhgbdnmKzZzyH6qB6njHMFfuincJaqlvjMmttgAvyDehrUcYEnMyl/>.

²⁶ *Id.*

²⁷ See Complaint 1 – High-Definition, Rumble (Feb. 14, 2024), <https://rumble.com/v4dkfn9-complaint-1-high-definition.html>.

²⁸ See Complaint 2 – High-Definition, Rumble (Feb. 14, 2024), <https://rumble.com/v4dkfs9-complaint-2-high-definition.html>.

²⁹ See Complaint 2 – Phone Footage, Rumble (Feb. 14, 2024), <https://rumble.com/v4dg8c0-complaint-2-phone-footage.html>.

³⁰ See Montage – Whitepine League, NCAA, and NBA, Rumble (Feb. 14, 2024), <https://rumble.com/v4dghe3-montage-whitepine-league-ncaa-and-nba.html>; see also *Avila v. Citrus Cmty. Coll. Dist.*, 38 Cal. 4th 148, 166 (2006) (“One who enters into a sport, game or contest may be taken to consent to physical contacts consistent with the understood rules of the game.” (citation omitted)); *Marchetti v. Kalish*, 53 Ohio St. 3d 95, 97 (1990) (“In denying recovery, the courts have often explained that a person who participates in a sport assumes the risk that he or she may be injured.” (citation omitted)).

³¹ Examining Doug Wilson & Moscow, Idaho, Facebook (Feb. 11, 2024), https://www.facebook.com/story.php?story_fbid=410368734838422&id=100075958973541.

³² See *supra* n.5.

³³ Robert Millage, Facebook (Feb. 10, 2024), <https://www.facebook.com/1593142397/posts/pfbid0Z9r96xUxZEyhyhgbdnmKzZzyH6qB6njHMFfuincJaqlvjMmttgAvyDehrUcYEnMyl/>.

motivated by actual malice.³⁴ That they were directed toward an innocent child further demonstrates the depth of your malice.³⁵

True to your mission, you are quick to tie this non-incident to Pastor Wilson and Christ Church. You write on Facebook that the event was “Doug Wilson’s fault” because he “found[ed] Logos School, install[ed] his son as a coach, and speak[s] contemptuously of unbelievers (presumably all public high school students and parents).” You also accuse Pastor Wilson of “telling his followers from Christ Church and Logos that it is acceptable to deceive in order to defeat anyone seen as the enemy.”³⁶ You similarly note in an earlier post that “Logos was founded by Doug Wilson” and that “Nate Wilson, son of controversial local pastor Doug Wilson, is the team’s coach.” You go even further, writing that “[u]nwanted sexual touching seems to be a feature not a bug in the organizations (such as Logos, and others) that are affiliated with Doug Wilson.”³⁷

Each of these statements is directly or impliedly defamatory. Neither Pastor Wilson nor his son—let alone Logos—has ever encouraged or enabled any form of sexual harassment. Nor has Pastor Wilson ever told “his followers” or anyone else to lie about simple historical events to achieve their ends, outside times of extreme crisis.³⁸ Finally, your statement that Logos and other organizations affiliated with Pastor Wilson invite “[u]nwanted sexual touching” has no possible basis in evidence. As explained at greater length below, Pastor Wilson, Christ Church, and Logos School have always categorically condemned sexual harassment of any kind.

None of this could stop you from capitalizing on the latest excuse to attack Pastor Wilson, Christ Church, and Logos School. But this incident crosses a Rubicon, even for you: attacking a child. With no regard to the facts or the law, you have deluded your audience into thinking a high-school sophomore was somehow groomed into sexually harassing his athletic opponents. In addition to being defamatory, your behavior is morally indefensible.

A final note: No doubt because of Christ Church’s retention of our firm, you have begun posing some of your defamatory assertions as questions (e.g., “Are the Logos Knights basketball players from Moscow, Idaho inappropriately grabbing the genitals of opposing players in order to

³⁴ See, e.g., *Compuware Corp. v. Moody's Inv. Servs., Inc.*, 499 F.3d 520, 526 (6th Cir. 2007) (noting that “the ‘purposeful avoidance of the truth is in a different category’ and may be sufficient to establish actual malice”); *Zerangue v. TSP Newspapers, Inc.*, 814 F.2d 1066, 1071 (5th Cir. 1987) (“[C]ourts have upheld findings of actual malice when a defendant failed to investigate a story weakened by inherent improbability, internal inconsistency, or apparently reliable contradictory information.”); *Babb v. Minder*, 806 F.2d 749, 755 (7th Cir. 1986) (“[R]eckless conduct may be evidenced in part by failure to investigate thoroughly and verify the facts ... particularly where the material is peculiarly harmful or damaging to the plaintiff’s reputation or good name.”); *Quigley v. Rosenthal*, 43 F. Supp. 2d 1163, 1180 (D. Colo. 1999) (“Failure to investigate obvious sources of refutation or corroboration of statements, especially when there is no time-pressure on their publication, may indicate not only negligence, but the higher standard of actual malice.”); see also *Palin v. N.Y. Times Co.*, 940 F.3d 804, 815 (2d Cir. 2019) (holding that “inclusion of . . . hyperlinked article” may “give rise to . . . [a] plausible inference” of actual malice sufficient to defeat summary judgment).

³⁵ Cf. *Armenta v. G/O Media, Inc., D/B/A Deadspin*, No. N24C-02-051 SPL, Dkt. 1, at 12–13, ¶ 26 (Del. Sup. Ct. Feb. 6, 2024).

³⁶ Examining Doug Wilson & Moscow, Idaho, Facebook (Feb. 11, 2024), https://www.facebook.com/story.php?story_fbid=410368734838422&id=100075958973541.

³⁷ Examining Doug Wilson & Moscow, Idaho, Facebook (Jan. 31, 2023), https://www.facebook.com/watch/?v=506849911564682&extid=CL-UNK-UNK-UNK-IO-OS_GKOT-GKIC&ref=sharing.

³⁸ See, e.g., Douglas Wilson, *On Not Fitting In at Their Missile Parade*, Blog & Mablog (Dec. 14, 2016), <https://dougwils.com/books-and-culture/s7-engaging-the-culture/not-fitting-missile-parade.html> (“If the Gestapo ask you if you have Jews hidden in a secret room in your basement, and you *do*, you do not have to thank them for the opportunity to come clean.”).

gain an advantage?") and inserting tepid qualifiers into your defamatory statements (e.g., "a basketball player from Logos High School of Moscow, Idaho allegedly groped the genitals of opposing players during games"). Obviously, posing assertions as questions and inserting the word "allegedly" every few lines is not a shield against liability for defamation and harassment.³⁹ Your posts still directly and impliedly accuse a minor of sexual assault, despite clear, contrary evidence. Moreover, you restate these same assertions elsewhere without any qualifying language, making the implication of your message explicit. For instance, on Facebook, you have referred simply to "Logos high school students grabbing the genitals of opponents during games" and added that "this is legally classified as sexual assault/battery."⁴⁰ Your concern for potential liability is not misplaced. But the methods with which you are mitigating this risk are wholly insufficient. You would be better off simply retracting your defamatory statements and ceasing production of new ones.

II. Pastor Wilson, Christ Church, and Logos School did not attack Emilie Dye or cover up for her abuser.

Examining Doug Wilson repeatedly accuses Pastor Wilson of covering up sex abuse at Logos School by failing to timely report it to law enforcement. In numerous posts across a plethora of social media accounts, you write that Pastor Wilson learned that student Emilie Paige Dye was engaged in "immoral behavior" when she was under 18 years old with her teacher, Jim Nance, at Logos School.⁴¹ According to your accounts, Pastor Wilson did not contact law enforcement despite knowing that Dye and Nance were engaged in "immoral behavior."⁴² And you state that Pastor Wilson deliberately misled Ms. Dye's family and others as to what contact he had with law enforcement.⁴³

Your narrative ignores the truth and instead is designed to promote your distorted portrait of Pastor Wilson. The reality is this: In the fall of 2014, when Ms. Dye was in 12th grade at Logos School, a school parent who was a part-time school secretary reported to Logos' superintendent that Ms. Dye and Mr. Nance seemed overly friendly with one another on a school trip the parent chaperoned. Within a few days, the superintendent and principal formally warned Mr. Nance about maintaining professionalism and adhering to school policy. Then, in December 2014, Ms. Dye's parents informed the school of an unprofessional Facebook message Mr. Nance sent Ms. Dye. The matter reached Logos' school board, and, notwithstanding the Dyes' wishes that the school *not* fire Mr. Nance, the board immediately and unanimously voted to fire him. When Christ Church

³⁹ See, e.g., *Celle v. Filipino Reporter Enterprises, Inc.*, 209 F.3d 163, 177-78 (2d Cir. 2000) ("It is the meaning reasonably attributable to the intended reader that controls.").

⁴⁰ Examining Doug Wilson & Moscow, Idaho, Facebook (Feb. 11, 2024), https://www.facebook.com/story.php?story_fbid=408637361678226&id=100075958973541.

⁴¹ See, e.g., @ExaminingMoscow, X (Dec. 1, 2023), <https://x.com/ExaminingMoscow/status/1730684492753277117?s=20>; @ExaminingMoscow, X (Nov. 25, 2023), <https://x.com/ExaminingMoscow/status/1728543674244456684?s=20>; @ExaminingMoscow, X (Dec. 3, 2023), <https://x.com/ExaminingMoscow/status/1731446580656365798?s=20>.

⁴² See, e.g., @ExaminingMoscow, X (Dec. 3, 2023), <https://x.com/ExaminingMoscow/status/1731446580656365798?s=20>; @ExaminingMoscow, X (Dec. 1, 2023), <https://x.com/ExaminingMoscow/status/1730684001508024579?s=20>; @ExaminingMoscow, X (Dec. 7, 2023), <https://x.com/ExaminingMoscow/status/1732822825965158537?s=20>.

⁴³ @ExaminingMoscow, X (Dec. 3, 2023), <https://x.com/ExaminingMoscow/status/1731442769577550027?s=20>; @ExaminingMoscow, X (Nov. 28, 2023), <https://x.com/ExaminingMoscow/status/1729627605014356226?s=20>.

became aware of Mr. Nance’s conduct, it removed him as a church elder.⁴⁴ At this point, neither Logos nor Christ Church (including Pastor Wilson) had encountered any indication of any physical or actionable abuse.

Two years later, on January 1, 2017, while Ms. Dye was visiting on Christmas Break from college, a Christ Church elder observed Mr. Nance and Ms. Dye conversing at church. The elder pulled Mr. Nance aside and chastised him, accusing him of concealing his relationship with Ms. Dye. The elder reported the confrontation to Pastor Wilson the same day.

On January 3, 2017, Mr. Nance confessed to Pastor Wilson that his relationship with Ms. Dye had become physical while she was an adult and in college. Pastor Wilson probed to determine if there had been more to the relationship while Ms. Dye was a student at Logos, and only then did Mr. Nance confess that in 2015, he had kissed her and touched her sexually. Pastor Wilson informed the new superintendent of Logos, and the two immediately contacted the Moscow Police Department. A January 5, 2017, police report indicates that Ms. Dye told the reporting officer that “the relationship became sexual while she was in college,” not when she was a student at Logos, and that she “denied anything happening while she was under 18,” including Mr. Nance’s assertion that he had touched her sexually in 2015. Because Ms. Dye’s eighteenth birthday was in August of 2014, and the disputed incident would have occurred in 2015, the police had nothing to investigate, and the matter came to an end.

Your account of this incident defames Pastor Wilson. You falsely allege that Pastor Wilson “lied” to Ms. Dye’s family (and potentially others) to make them believe that Pastor Wilson contacted law enforcement in 2014.⁴⁵ But the 2017 police report makes clear that Pastor Wilson did not learn of any potentially criminal conduct until mere days before the police report was filed—over two years later, and only after he encountered additional information suggesting a *physical* relationship that *might* have begun before her eighteenth birthday. Here, again, given your decade-long obsession with our client and your cozy relationship with media figures who have cited the 2017 police report,⁴⁶ it is nearly impossible to believe that you have not previously read the report.

Your own posts make clear that you knew that Pastor Wilson did not have all the facts after the relationship was initially disclosed. On December 2, 2023, an X user posted: “The school fired the teacher [Jim Nance] in spite [of] the parents asking not to fire him. Why were the parents speaking against the firing of the teacher?”⁴⁷ You responded only that Pastor Wilson and Logos knew that “*something* had transpired between Emilie and Nance.”⁴⁸ Put differently: you tacitly admit that Pastor Wilson’s and Logos’s knowledge was limited because all they knew was that “something” had transpired. Based on Emilie’s contemporaneous testimony, Pastor Wilson and Logos ultimately reached the conclusion that nothing physical or illegal had occurred—and that there was therefore no reason to contact the police. Indeed, no one contests that Ms. Dye did not reveal the full extent of her relationship with Mr. Nance, even when she had ample opportunity to do so. Even Pastor Wilson’s reporting, two years after Mr. Nance’s firing, was out of an abundance of

⁴⁴ After the full scope of Mr. Nance’s abuse was revealed, Canon Press exercised a moral turpitude clause in its contract with Mr. Nance, stripped him of copyrights on logic curricula he cowrote, and canceled an extensive video curriculum he produced, incurring extraordinary expenses to produce a replacement.

⁴⁵ @ExaminingMoscow, X (Dec. 3, 2023), <https://x.com/ExaminingMoscow/status/1731442769577550027?s=20> (“Doug Wilson lied to her parents that he had contacted the police. But he hadn’t.”).

⁴⁶ See *infra* n.54.

⁴⁷ @annagconrad, X (Dec. 2, 2023), <https://x.com/annagconrad/status/1731160283991699666?s=20>.

⁴⁸ @ExaminingMoscow, X (Dec. 3, 2023), <https://twitter.com/ExaminingMoscow/status/1731446123154268371>.

caution, as all evidence indicates that the only sexual, physical contact occurred *after* Ms. Dye turned 18.⁴⁹

Finally, you have repeatedly posted false accusations that Pastor Wilson or his wife accused Ms. Dye of being complicit in Mr. Nance’s assault, of being a “slut,” or of seducing Nance.⁵⁰ In truth, the Wilsons have never attacked Ms. Dye or accused her of seducing Mr. Nance. No one in Christ Church leadership—including, of course, the Wilsons—ever exhibited anything but kindness and compassion toward Ms. Dye. In fact, the very day Mr. Nance confessed to sexual contact with Ms. Dye, Mrs. Wilson emailed Ms. Dye, offering her love, prayers, and “someone to talk to.” Mrs. Wilson continued to reach out through the spring of 2017, offering encouragement, prayers, and support. Ms. Dye was never reprimanded, punished, or disciplined in any way—instead, countless steps were taken to protect her and respect her privacy.

Your lies to the contrary are the result of malice. There is no doubt that your disregard for the truth is born out of ill will toward Pastor Wilson and Christ Church.⁵¹ More importantly, your posts demonstrate either that you have actual knowledge of the facts or that you have purposefully avoided learning the truth—despite having the facts readily available to you in numerous fora.⁵² You have conspired with media figures to give your defamatory statements a greater platform,⁵³ without any regard to those figures’ demonstrated dishonesty or the contempt they have for Christianity as a whole.⁵⁴ And you have done so with the intent to harm Christ Church and Pastor Wilson.

⁴⁹ See Douglas J. Wilson, *The Jim Nance Timeline*, Blog & Mablog (Jan. 7, 2017), <https://dougwils.com/the-church/a-jim-nance-timeline.html>. We find it difficult to believe that you have not reviewed the forgoing post, given your close coverage of the matter. This is, of course, additional evidence of actual malice.

⁵⁰ See, e.g., @ExaminingMoscow, X (Dec. 1, 2023), <https://x.com/ExaminingMoscow/status/1730684492753277117?s=20>; @ExaminingMoscow, X (Dec. 3, 2023), <https://x.com/ExaminingMoscow/status/1731446580656365798?s=20>; @ExaminingMoscow, X (Dec. 7, 2023), <https://x.com/ExaminingMoscow/status/1732822825965158537?s=20>; @ExaminingMoscow, X (Jan. 9, 2024), <https://x.com/ExaminingMoscow/status/1744765709345812652?s=20>; @ExaminingMoscow, X (Jan. 27, 2024), <https://x.com/ExaminingMoscow/status/1751374651702284335?s=20>.

⁵¹ See, e.g., *Enigma Software Grp. USA, LLC v. Bleeping Computer LLC*, 194 F. Supp. 3d 263, 288 (S.D.N.Y. 2016); *Lieberman v. Gelstein*, 605 N.E.2d 344, 352 (N.Y. 1992) (evidence that defendant was motivated to make false statements about plaintiff out of spite, bias, or ill will tends to support a finding of actual malice); *Diorio v. Ossining Union Free Sch. Dist.*, 946 N.Y.S.2d 195, 198 (N.Y. App. Div. 2012) (same); see also *Brown v. Petrolite Corp.*, 965 F.2d 38, 47 (5th Cir. 1992) (evidence of ill-will can bolster an inference of actual malice); *Spirito v. Peninsula Airport Comm’n*, 350 F. Supp. 3d 471, 481 (E.D. Va. 2018) (same).

⁵² *Harte-Hanks Communications, Inc. v. Connaughton*, 491 U.S. 657, 692 (1989) (“Although failure to investigate will not alone support a finding of actual malice, the purposeful avoidance of the truth is in a different category.” (cleaned up)).

⁵³ Examining Doug Wilson & Moscow, Idaho, Facebook (Feb. 11, 2024), https://www.facebook.com/story.php?story_fbid=410368734838422&id=100075958973541 (referring to your correspondence with media outlets and soliciting media contacts).

⁵⁴ See, e.g., Sarah Stankorb, *Inside the Church That Preaches ‘Wives Need to Be Led with a Firm Hand’*, Vice (Sept. 28, 2021), <https://www.vice.com/en/article/m7ezwx/inside-the-church-that-preaches-wives-need-to-be-led-with-a-firm-hand>; Sarah Stankorb, *Disobedient Women: How a Small Group of Faithful Women Exposed Abuse, Brought Down Powerful Pastors, and Ignited an Evangelical Reckoning* (Hachette Book Group 2023); Sarah Stankorb, *The Women Exposing Abuse at Their Churches*, Vice (Oct. 25, 2023), <https://www.vice.com/en/article/m7bxgp/disobedient-women-book-excerpt-ohio-churches-abuse>; Sarah Stankorb, *That Moscow Mood: How much culture war is too much, for American evangelicals?*, Slate (Dec. 2, 2023), <https://slate.com/human-interest/2023/12/evangelical-church-doug-wilson-idaho-culture-war-no-quarter-november.html>.

III. Neither Pastor Wilson nor Mrs. Wilson has ever asked inappropriate questions about anyone's sexual behavior.

You falsely accuse Pastor Wilson of asking students at Logos School to share “graphic detail” of sexual acts in which they have engaged.⁵⁵ This is a distortion. In reality, Pastor Wilson asks only questions that are necessary for him to fulfill his responsibility for his parishioners' health, wellbeing, and legal protection. The same is true of Mrs. Wilson, who, in addition to offering informal counseling to parishioners, was a teacher at Logos School at relevant times.

You have written specifically of two former Logos students, Helen Shores and Kamilla Niska. In one post, you write that Pastor Wilson asked Ms. Shores to “tell him in detail[] everything that happened when” she had sex with her boyfriend.⁵⁶ In another post, you write that Ms. Niska heard that Pastor Wilson and his wife were “asking multiple students about their sexual activity” and that Pastor Wilson “just wants to sit there and listen to everything that transpired between these two teen lovers, like all the graphic detail.”⁵⁷

Neither Pastor Wilson nor Mrs. Wilson has ever sought to learn “graphic detail” of the sexual relationships of “teen lovers” or anyone else. Any questions either of them has asked in such contexts have been aimed at discrete and legitimate goals. For example, it is necessary to determine whether a minor who has engaged in sexual interactions was ever forced to do anything against her will or had a sexual encounter with an adult. This can include the extent of sexual conduct, such as the details of touching and sexual penetration, which are predicates to certain crimes subject to mandatory reporting. For these purposes, asking uncomfortable questions is the only way to determine what must be done to protect victims. Had Pastor Wilson failed to ask these difficult questions to determine whether sexual misconduct had occurred, you surely would use that failure as additional support for your (false) claim that Pastor Wilson ignores and downplays sexual assaults.

Ms. Shores, for instance, was 16 years old when she had sex with a classmate. This makes the acts in which the two engaged relevant for many purposes. For example, asking whether the couple used contraceptives, including condoms, would be reasonable and necessary. Medical care and counseling may become urgently necessary, and the extent of her physical contact may also indicate whether she had been sexually abused. Ms. Niska, too, was engaging in a covert relationship at school. Her teacher, Mrs. Wilson, heard as much, and asked her on one occasion whether it was true.⁵⁸ The truth of that rumor could have had enormous implications for Ms. Niska's health and wellbeing. And here, again, you would have used the failure to inquire as proof positive of the Wilsons' alleged negligence. Your posts concerning Ms. Shores and Ms. Niska reveal your motive is not to discover the truth but to smear the Wilson family.

⁵⁵ @ExaminingMoscow, X (Oct. 25, 2023), <https://x.com/ExaminingMoscow/status/1717207298253131961?s=20>.

⁵⁶ @ExaminingMoscow, X (Oct. 25, 2023), <https://x.com/ExaminingMoscow/status/1717207286475575586?s=20>.

⁵⁷ @ExaminingMoscow, X (Oct. 25, 2023), <https://x.com/ExaminingMoscow/status/1717207298253131961?s=20>.

⁵⁸ Mrs. Wilson has never initiated any conversations with students about their sexual experiences. When students sought her advice on relationships or other private matters, Mrs. Wilson's policy was to seek parents' permission before giving students advice.

IV. Christ Church and Pastor Wilson condemn sexual assault, including marital rape, in the strongest possible terms.

You have also made a point of blasting our client for his teachings about sexual mores, which, on your account, “encourage marital rape.”⁵⁹ This is nonsense. Pastor Wilson has written extensively on the marital relationship, and, in his writings, he repeatedly condemns sexual misconduct—in all forms and in all relationships—in the harshest terms. For example, Pastor Wilson wrote in *Fidelity*—with jarring honesty—that the Biblical penalty for the sexual abuse of young children is *death*.⁶⁰ He has also written to condemn of rape and “rape fantasies” in contemporary culture.⁶¹ In short, Pastor Wilson has publicly and repeatedly condemned rape and sexual abuse, including in the context of marriage.

You were aware of this at the time that you published your false claims, having read *Fidelity* and other writings of Pastor Wilson that make the same points. As mentioned above, the quote from *Fidelity* you typically cite comes only a few pages after Pastor Wilson concludes a lengthy condemnation of rape and its pervasiveness in modern culture.⁶² And it is far from alone. As you know from your attentive following of Pastor Wilson’s writing, Pastor Wilson has firmly and frequently spoken out against sexual abuse within marriage.

* * *

These four lies barely scratch the surface of your defamatory work; a full catalogue would span hundreds if not thousands of pages. Indeed, *Examining Doug Wilson*’s whole being is devoted to manufacturing, republishing, and spreading lies about Pastor Wilson, Christ Church, and Logos School. You apparently know no boundaries, attacking even a high-schooler for the crime of attending Logos.

This harassment has gone on long enough. You portray Pastor Wilson and anyone affiliated with him as predators who view women and children as servile playthings for men’s sexual desires. What began as petty, internecine sparring from those who have nothing better to do with their time has led Christians to become bedfellows with a dishonest media driven by contempt for the Church, its servants, and the Christian faith. The media have deceived you into thinking you are doing more good than harm by participating in their efforts to dismantle Christianity in the public realm. But the objects of your vitriol want only to proclaim the Gospel of Jesus Christ and to serve God and man in their community. They never invited this, and they have stayed peaceful and prayerful throughout. Christ Church will no longer sit idly by while it is maligned by a group protected from scrutiny by its anonymity— anonymity that will disappear in the context of any litigation. We demand a complete retraction of each of your accounts and a prompt, public apology to Christ Church, Logos School, Pastor Wilson, and Pastor Wilson’s family.

⁵⁹ @ExaminingMoscow, X (Sept. 18, 2022), <https://x.com/ExaminingMoscow/status/1571701786880131073?s=20>; @ExaminingMoscow, X (Dec. 2, 2023), <https://x.com/ExaminingMoscow/status/1731011318126158142?s=20>; @ExaminingMoscow, X (May 19, 2022), <https://x.com/ExaminingMoscow/status/1527378814250012685?s=20>; @ExaminingMoscow, X (Nov. 8, 2022), <https://x.com/ExaminingMoscow/status/1590036525504659456?s=20>; @ExaminingMoscow, X (Aug. 8, 2022), <https://x.com/ExaminingMoscow/status/1556695546181582848?s=20>.

⁶⁰ Wilson, *supra* n.16, at 87.

⁶¹ *Id.* at 89.

⁶² *Id.*

This is not a full statement of Christ Church's or Pastor Wilson's rights and remedies, which are expressly reserved.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth M. Locke, P.C." in a cursive style.

Elizabeth M. Locke, P.C.

A handwritten signature in black ink that reads "Eric D. Hageman" in a cursive style.

Eric D. Hageman