

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**BOB HARVIE and BOB HARVIE FOR
CONGRESS,**

Plaintiffs,

v.

**DEFENDING AMERICA PAC, INC. and
CHRIS PACK,**

Defendants.

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CIVIL ACTION

No. 2:26-cv-05544

JURY DEMANDED

COMPLAINT

Plaintiffs Bob Harvie and Bob Harvie for Congress bring this action against Defendants Defending America PAC, Inc. and Chris Pack (together, “Defendants”), arising from Defendants’ sustained campaign to defame Harvie by repeatedly and recklessly publishing false and defamatory statements imputing criminal conduct that go beyond the bounds even of a highly contested political campaign.

INTRODUCTION

1. Plaintiff Bob Harvie is the Democratic Party nominee for Representative in Congress for Pennsylvania’s 1st Congressional District in the November 3, 2026 General Election.

2. Over the past year, Defendants—an out-of-state Super PAC and its out-of-state political consultant—have repeatedly and recklessly published false and defamatory statements calling Harvie an “FBI corruption subject” or “under FBI investigation” on a dedicated website, <http://www.fireharvie.com>, in a produced video, in social media posts, and through an electronic mail list intended to reach Harvie’s community in Pennsylvania’s 1st Congressional District.

3. This is not a mere political attack in a hotly contested campaign. Contrary to the meaning that out-of-state political operatives have endeavored to convey—to convince Harvie’s

community that Harvie is somehow connected to a crime—Harvie is not now and never has been the target of any criminal investigation nor has he ever been charged with a crime.

4. Rather, public reporting makes clear that Harvie appeared before a federal grand jury in 2021 as a witness, as a former Falls Township elected official alongside several other current and former Falls Township officials, in a probe of political donations and union contracts related to the Pennsbury School District in Bucks County, Pennsylvania.

5. But these unscrupulous out-of-state operatives did not stop there. After Harvie's attorney sent a cease-and-desist letter on July 2, 2026, not only have Defendants boldly continued their attacks, but they now peddle outrageous accusations of inappropriate conduct with a county employee without any substantiation.

6. Defendants' allegations are not only provably false, but in their concerted effort to damage Harvie's reputation in his community, Defendants are making their statements based upon undisclosed defamatory facts or with reckless indifference to whether their statements are true or false. Either way, Defendants acted with actual malice, even in a hotly contested political campaign.

7. Defendants' deliberate and ongoing dissemination of these false claims across multiple media platforms—falsely portraying Harvie as the target or subject of a federal criminal investigation despite publicly available reporting putting Defendants on notice otherwise and making baseless accusations of inappropriate conduct with a county employee—is not politics as usual. Instead, these statements give rise to actionable claims for defamation and false light invasion of privacy.

JURISDICTION AND VENUE

8. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332.

9. This civil action is between plaintiffs who are citizens of the Commonwealth of Pennsylvania and defendants who are citizens of States of Georgia and New York.

10. The amount in controversy exceeds \$150,000 exclusive of interest and costs.

11. Venue is proper in this district, which contains Pennsylvania's 1st Congressional District in its entirety, in which a substantial part of the events or omissions giving rise to the claim occurred pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

12. Plaintiff Bob Harvie ("Harvie") is a citizen of the Commonwealth of Pennsylvania.

13. Plaintiff Bob Harvie for Congress is the principal campaign committee authorized by Bob Harvie and registered with the Federal Election Commission in connection with his candidacy for office in the U.S. House of Representatives.

14. Bob Harvie for Congress maintains a registered mailing address of P.O. Box 67, Langhorne, Pennsylvania 19047.

15. Defendant Defending America PAC, Inc. ("Defending America PAC") is an independent expenditure-only political committee, or Super PAC, registered with the Federal Election Commission.

16. Defending America PAC provided on its Statement of Organization filed with the Federal Election Commission an address of 824 South Milledge Avenue, Suite 101, Athens, Georgia 30605.

17. Defending America PAC is incorporated as a New York not-for-profit corporation at an address of 13349 Broadway Street, Alden, New York 14004.

18. Upon information and belief, therefore, Defending America PAC is a citizen of the States of Georgia and New York.

19. Upon information and belief, Defendant Chris Pack is a political operative who developed and/or approved Defending America PAC's publications calling Harvie an "FBI corruption subject" or "under FBI investigation" and its baseless accusations of inappropriate conduct with a county employee.

20. Upon information and belief, Defendant Pack is a citizen of the State of New York residing at 233 Sunset Court, Buffalo, New York 14428.

FACTUAL ALLEGATIONS

Harvie's History of Public Service

21. Harvie is the Democratic Party nominee for Representative in Congress for Pennsylvania's 1st Congressional District in the November 3, 2026 General Election.

22. Born and raised in Bristol Borough, Harvie is a lifelong resident of Bucks County, Pennsylvania.

23. Throughout his life, Harvie has served in roles of public trust because of his reputation in his community. For twenty years, Harvie was a teacher and chair of the Social Studies Department at Bucks County Technical High School.

24. After moving to Falls Township in 1999, Harvie became involved in government, serving on the Falls Township Planning Commission for two years.

25. Harvie served on the Falls Township Board of Supervisors from 2003 to 2019, including as Chair of the Board from 2008 to 2019.

26. Harvie was elected to the Board of Commissioners of Bucks County in 2019 and reelected in 2023.

27. Harvie served as Chair of the Board of Commissioners from 2022 to 2023 and again from 2025 to 2026.

28. Harvie currently serves as Vice-Chair of the Board of Commissioners of Bucks County.

29. Harvie also serves or has served in a number of other roles of public trust, including as a member of the boards of the Southeastern Pennsylvania Transportation Authority (SEPTA), the Pennsylvania Convention Center Authority, the Delaware Valley Regional Finance Authority, the Pennsylvania 911 Advisory Board, and the Pennsylvania Workforce Development Board.

The Public Record Regarding the FBI's Investigation in Bucks County

30. In July 2020, *LevittownNow.com* reported that the FBI was investigating matters “related to local government and politics, unions, contractors, political donations, and recent problems in the Pennsbury School District” in Bucks County.¹

31. The article reported that the FBI’s probe dated back to 2017.²

32. On September 2022, *LevittownNow.com* published another report stating that Harvie had testified as a witness before a federal grand jury in connection with the investigation.³

33. Harvie was never a target of the FBI’s investigation in Bucks County.

34. Harvie understood that he appeared in the capacity of a witness at the time of his grand jury testimony.

¹ Tom Sofield, “Exclusive: FBI, Other Law Enforcement Asking Questions in Area,” *LevittownNow.com* (July 27, 2020), <https://levittownnow.com/2020/07/27/law-enforcement-asking-questions-in-area/>.

² *Id.*

³ Tom Sofield, “Exclusive: County Commissioner Harvie, Other Former & Current Falls Twp. Officials Testify Before Grand Jury,” *LevittownNow.com* (Sept. 13, 2022), <https://levittownnow.com/2022/09/13/exclusive-county-commissioner-harvie-other-former-current-falls-twp-officials-testify-before-grand-jury/> *Testify Before Grand Jury - LevittownNow.com*.

35. The September 13, 2022 article made clear that “no charges have been filed, no indictments handed down, and no accusations of wrongdoing have been made by authorities at this point.”⁴

36. The article also made clear that “[b]eing called to testify before a grand jury does not confirm any involvement in potential crimes and is part of the investigative process in the federal system.”⁵

37. A year later, in September 2023, Harvie’s political opponents, in an attempt to attack him, mischaracterized his involvement in the FBI investigation.

38. Specifically, as Harvie ran for reelection as Bucks County Commissioner, *LevittownNow.com* reported that Harvie’s Republican opponents sent out campaign mailers stating that Harvie was “wrapped up in an FBI investigation.”⁶

39. Harvie immediately and publicly issued a statement, published by *LevittownNow.com*, denying this claim as categorically false: “I am not now and never have been the target of any criminal investigation.”⁷

40. Contemporaneous public reporting corroborated Harvie’s denial: “Sources close to the probe have told *LevittownNow.com* over the past year that they had not seen evidence Harvie was the target of the investigation.”⁸

⁴ *Id.*

⁵ *Id.*

⁶ Tom Sofield, “Commissioner Harvie Says He Wasn’t Target of FBI Investigation,” *LevittownNow.com* (Sept. 30, 2023), <https://levittownnow.com/2023/09/30/commissioner-harvie-says-he-wasnt-target-of-fbi-investigation/>.

⁷ *Id.*

⁸ Tom Sofield, “Union Officials: Candidates Apologized for Mailer,” *LevittownNow.com* (Oct. 6, 2023), <https://newtownpanow.com/2023/10/06/union-backlash-over-gop-mailer-sparks-tensions-in-county-commissioners-race/>.

41. Afterward, the Republican candidates promoted in the campaign mailer “denounced the mailer and apologized,” and Harvie publicly stated that one of the candidates “admitted” to another Bucks County commissioner “that [the candidate] knows these attacks are lies.”⁹

42. Harvie has never been charged with any crime in connection with the FBI’s investigation in Bucks County.

43. Harvie has had no further contact whatsoever with the FBI since testifying as a witness before the federal grand jury.

44. Since 2022, Harvie has not been asked to provide any further testimony, information, or assistance in connection with any FBI investigation in Bucks County or elsewhere.

45. Nevertheless, during Harvie’s current Congressional campaign, Defendants have repeatedly published statements falsely asserting or implying that Harvie was, or is, the “subject of an FBI investigation” and that he appeared before the federal grand jury because he was under criminal investigation.

**Defendants Accuse Harvie of Being an
“FBI Corruption Subject” or “Under FBI Investigation”**

46. In April 2025, Harvie announced his candidacy for the U.S. House of Representatives, and in September 2025, he filed a Statement of Candidacy with the Federal Election Commission for Pennsylvania’s 1st Congressional District, designating Bob Harvie for Congress as his principal campaign committee.

⁹ *Id.*

47. In the May 19, 2026 Primary Election, Harvie won the Democratic Party's nomination for Representative in Congress for Pennsylvania's 1st Congressional District in the November 3, 2026 General Election.

48. Since at least the time that Harvie announced his candidacy for the U.S. House of Representatives, Defendant Defending America PAC has maintained a website titled "Fire Bob Harvie" at <http://www.fireharvie.com>. The disclaimer at the bottom of the website states, "Paid for by Defending America PAC. Not authorized by any candidate or candidates [sic] committee. 824 S Miledge [sic] Avenue, Ste 102, Athens, GA 30605."

49. Pages on the website repeatedly refer to Harvie as "the subject of an FBI corruption investigation" or an "FBI corruption subject" without providing the basis for its statement.

50. For example, on pages about fourth quarter 2025 campaign finance reports,¹⁰ an early Democratic Congressional Campaign Committee's "Red to Blue" list,¹¹ a Bucks County Democratic Committee forum,¹² former Congressman Eric Swalwell,¹³ and campaign websites¹⁴ all state that Harvie "ma[d]e himself the subject of an FBI corruption investigation" or use the label "FBI corruption subject Bob Harvie" without explanation.

¹⁰ "Bob Harvie Is Totally Fu...", *Fire Bob Harvie*, <https://fireharvie.com/bob-harvie-is-totally-fu/> (last accessed Aug. 4, 2026).

¹¹ "House Dem Campaign Arm Bails on Bob Harvie," *Fire Bob Harvie*, <https://fireharvie.com/house-dem-campaign-arm-bails-on-bob-harvie/> (last visited Aug. 4, 2026).

¹² "Plot Twist: Santarsiero Is a Racist AND a Misogynist," *Fire Bob Harvie*, <https://fireharvie.com/plot-twist-santarsiero-is-a-racist-and-a-misogynist/> (last visited Aug. 4, 2026).

¹³ "VIDEO: Bob Harvie Protects Sexual Predators," *Fire Bob Harvie*, <https://fireharvie.com/video-%f0%9f%93%b9-bob-harvie-protects-sexual-predators/> (last visited Aug. 4, 2026); "Harvie Shamed Into Calling Out Sexual Predators," *Fire Bob Harvie*, <https://fireharvie.com/harvie-shamed-into-calling-out-sexual-predators/> (last visited Aug. 3, 2026).

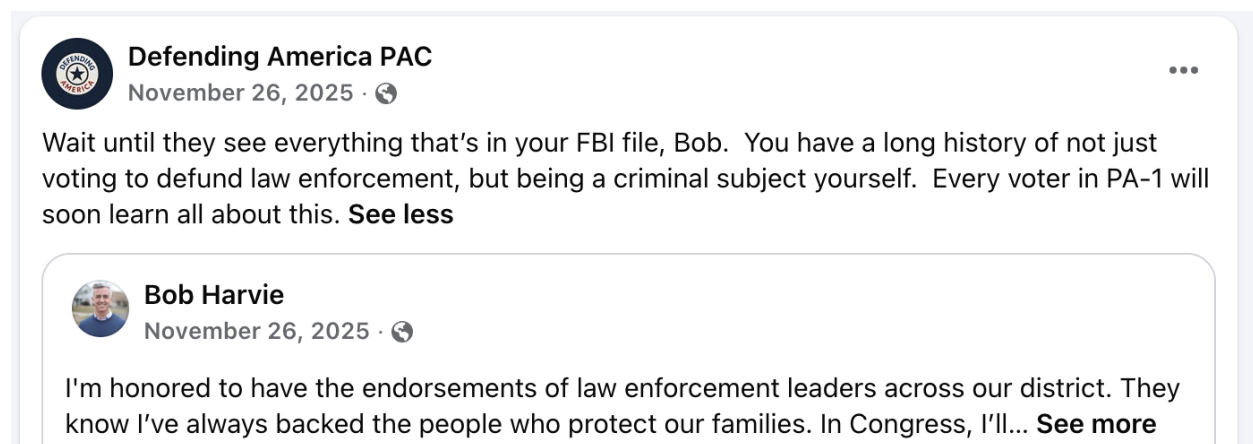
¹⁴ "Bob Harvie Caught Coordinating with Special Interest and Dark Money Groups," *Fire Bob Harvie*, <https://fireharvie.com/bob-harvie-caught-coordinating-with-special-interest-and-dark-money-groups/> (last visited Aug. 4, 2026).

51. None of these pages provide any basis for the labels that it uses to connect Harvie to an FBI corruption investigation particularly when discussing unrelated topics.

52. Upon information and belief, Defending America PAC has used similar language on other pages on the website.

53. In addition, Defending America PAC has referred to Harvie as an “FBI corruption subject” in at least thirty social media posts.

54. For example, when Harvie posted that he was “honored to have the endorsement of law enforcement leaders across our district,” Defending America PAC blatantly suggested that it had undisclosed information and threatened that “[e]very voter in PA-1 will soon learn all about this”:



55. Upon information and belief, Defendant Chris Pack developed and/or approved Defendant America PAC’s sustained campaign of calling Bob Harvie an “FBI corruption subject” or “under FBI investigation.”

56. Campaign finance reports reveal payments by Defending America PAC for “strategy consulting” to Defendant Pack’s firm, Breakwall Group.

57. A recent publication identified Defendant Pack as “President” of Defending America PAC.¹⁵

58. Upon information and belief, Defendant Pack has repeatedly told reporters that Harvie is an FBI corruption subject or under FBI investigation.

59. In addition, Pack has called Harvie an FBI corruption subject or under FBI investigation on his personal accounts on X.com at least twenty-seven times.

60. The term “subject” has a specific meaning in federal criminal investigations. The U.S. Department of Justice Manual defines “‘subject’ of an investigation” as “a person whose conduct is within the scope of the grand jury’s investigation.” JM 9-11.151.

61. The repeated use of the phrase “FBI corruption subject” or “under FBI investigation” by Defendants throughout their communications and across multiple platforms are susceptible to only one reasonable conclusion: that Defendants intend to impute criminal conduct to Harvie.

62. These statements by Defendants convey to residents of Pennsylvania’s 1st Congressional District, in Harvie’s community, that Harvie committed crimes, abused his public office, engaged in public corruption, and was, or is, the subject of an FBI investigation.

Defendants Double Down on Defamation

63. On July 2, 2026, Plaintiffs sent a cease-and-desist letter to Defendants demanding that they “immediately cease and desist from falsely calling Bob an ‘FBI corruption subject,’ remove any such references on websites and social media accounts controlled by Defending

¹⁵ Tom Sofield, “Congressional Candidate Bob Harvie Sends Cease-&-Desist Letter to PAC Over Attack Ads,” *LevittownNow.com* (July 2, 2026), <https://levittownnow.com/2026/07/02/congressional-candidate-bob-harvie-sends-cess-desist-letter-to-pac-over-attack-ads/>.

America PAC or Chris Pack, and issue a public apology to set the record straight for the voters of Pennsylvania’s 1st Congressional District.” Letter from Timothy J. Ford, Esq. to Paul Kilgore & Chris Pack (July 2, 2026) (“Cease-and-Desist Letter”), attached as **Exhibit A**.

64. The Cease-and-Desist Letter further explained that Defendants “cannot easily disclaim awareness of serious doubts as to [the] truth” of Defendants’ baseless allegations when they “republish[] a claim after it has been publicly and specifically denied by its subject, and after press reporting has corroborated the denial.” Cease-and-Desist Letter, Ex. A at 2 (citing *St. Amant v. Thomson*, 390 U.S. 727, 732 (1968)).

65. The Cease-and-Desist Letter further put Defendants on notice of the falsity of their baseless accusations, stating, “And if you somehow had not already been on notice of Bob’s public denials and other statements around the grand jury testimony, this letter now puts you on notice.” Cease-and-Desist Letter, Ex. A at 3.

66. Defendants did not respond directly to Plaintiffs. Instead—despite the Cease-and-Desist Letter’s notice of the falsity of Defendants’ baseless allegations—Defendants doubled down on their false and defamatory statements online.

67. Specifically, Defendant Pack “[a]greed” with the Cease-and-Desist Letter that he made false and defamatory statements, adding that “you’ll need to update” the number of times he called Harvie an FBI corruption subject “to 28”:



68. Most recently, Defending America PAC added a page on its “Fire Bob Harvie” website titled, “Defending America PAC Offers to Pay for FBI Corruption Subject Bob Harvie’s Defamation Lawsuit.”¹⁶

69. The page further stated, “Fast forward to today, and he still hasn’t filed suit *despite us calling him an FBI corruption subject dozens of additional times.*”¹⁷

Without Any Facts, Defendants Make Outrageous Accusations of Inappropriate Conduct

70. Defendants did not stop there. In addition to their admission that they called Harvie “an FBI corruption subject dozens of additional times,” they published a new defamatory statement about “Harvie getting a little too cozy with a county employee” in a post on Defendants’ website titled, “Defending America PAC Offers to Pay for FBI Corruption Subject Bob Harvie’s Defamation Lawsuit.”¹⁸

71. The publication linked to a screenshot of a Facebook post with a picture of Harvie and the text, “I’m Bobbie Harvie and I banged #SaraRisi, a Bucks County Children Children [sic] and Youth Worker while I was married. Did I help her become a supervisor?”¹⁹

72. On July 29, 2026, Defendants also widely published by email to their email list the web post titled “Defending America PAC Offers to Pay for FBI Corruption Subject Bob Harvie’s Defamation Lawsuit,” which included the same defamatory statement referenced in paragraph 70 with a link to a screenshot of the Facebook post referenced in paragraph 71.

¹⁶ “Defending America PAC Offers to Pay for FBI Corruption Subject Bob Harvie’s Defamation Lawsuit,” *Fire Bob Harvie*, <https://fireharvie.com/defending-america-pac-offers-to-pay-for-fbi-corruption-subject-bob-harvies-defamation-lawsuitwhen-can-we-expect-fbi-corruption-subject-bob-harvies-defamation-lawsuit/> (last visited Aug. 4, 2026).

¹⁷ *Id.* (emphasis added).

¹⁸ *Id.*

¹⁹ <https://fireharvie.com/wp-content/uploads/2026/07/DirtyBob.jpeg> (last visited Aug. 4, 2026) (the “Facebook Publication”).

73. Harvie never cheated on his wife and never had sex with a Bucks County employee.

74. Harvie never used his position to influence a decision to promote a Bucks County employee inappropriately.

75. The Facebook Publication directly accuses Harvie of engaging in an extramarital relationship with a Bucks County employee while serving as a Bucks County Commissioner and misusing his public office, in order to destroy his reputation.

76. Upon information and belief, Defendants made no effort to verify the truth of the Facebook publication before uploading a screenshot of the Facebook post to their website, thereby republishing it, and then widely disseminating it by email to their mailing list.

77. It is incorrect, irresponsible, and defamatory for Defendants to take unfounded allegations and republish them without regard for the truth of the allegations.

78. Defendants' reckless disregard for the truth rises to the level of actual malice, even in the context of a hotly contested political campaign.

CLAIMS FOR RELIEF

Count I Defamation

(Plaintiffs Bob Harvie and Bob Harvie for Congress Against All Defendants)

79. Plaintiffs Bob Harvie and Bob Harvie for Congress incorporate by reference the allegations contained in the preceding paragraphs as though fully set forth.

80. Defendants published, and continue to publish, numerous false and defamatory statements concerning Harvie and Bob Harvie for Congress through a dedicated website, social media posts, email communications, and video posts.

81. Defendants have published their false and defamatory statements widely and have been received by Harvie's community in Pennsylvania's 1st Congressional District.

82. Defendants falsely and imply that Harvie was, or is, under FBI investigation, the subject of an FBI criminal investigation, an “FBI Corruption Subject,” or an “FBI Criminal Corruption Subject,” and that he engaged in criminal conduct.

83. Defendants also falsely state and imply that Harvie cheated on his wife, had sex with a Bucks County employee, and used his position to influence a decision to promote a Bucks County employee inappropriately.

84. The statements expressly identify Harvie by name and are understood by their recipients, including Harvie’s community in Pennsylvania’s 1st Congressional District, to refer to Harvie.

85. The statements are false. Harvie has never been charged with any crime in connection with the FBI’s investigation in Bucks County, and he has never engaged in the criminal conduct Defendants attribute to him.

86. Harvie was never a target of the FBI’s investigation.

87. Harvie understood that he provided testimony in grand jury proceedings in the capacity of a witness.

88. In addition, Harvie has never cheated on his wife and never had sex with a Bucks County employee, nor has he ever used his position to influence a decision to promote a Bucks County employee inappropriately.

89. The statements made by Defendants are capable of a defamatory meaning and are understood by recipients, including Harvie’s community in Pennsylvania’s 1st Congressional District, to mean that Harvie committed crimes, abused his public office, engaged in public corruption, and was, or is, under federal criminal investigation.

90. These statements harm Harvie's reputation, expose him to public contempt and ridicule, discourage others from associating with him, and tend to lower him in the estimation of the community.

91. The statements constitute defamation per se because they falsely impute criminal conduct and sexual misconduct incompatible with Harvie's fitness to serve as an elected public official.

92. Under Pennsylvania law, a statement can be defamatory without charging a particular criminal offense by name or description. Restatement (Second) of Torts § 571, cmt. c.

93. Defendants know the statements are false or act with reckless disregard as to their truth or falsity, intending to portray Harvie falsely as corrupt and engaged in criminal conduct.

94. Despite Harvie's repeated public denials and independent media reports directly refuting Defendants' claims that Harvie was, or is, the subject or target of an FBI investigation, Defendants repeatedly publish and republish these false statements.

95. Likewise, Defendants made no effort to verify the truth of a Facebook post that they republished on their website directly accusing Harvie of engaging in an extramarital relationship with a Bucks County employee while serving as a Bucks County Commissioner and misusing his public office to promote a Bucks County employee.

96. Defendants never state the basis for their false and defamatory statements, which imply the existence of undisclosed defamatory facts.

97. As a direct and proximate result of Defendants' defamatory publications, Harvie suffers serious injury to his reputation and standing in the community, including among residents in Bucks County and Pennsylvania's 1st Congressional District, both during and after his campaign for Representative in Congress for Pennsylvania's 1st Congressional District.

98. In Defendants' concerted effort to diminish public confidence in Harvie's integrity and fitness for public office, Defendants' publications have harmed his personal and professional reputation built over more than two decades of public service, caused emotional distress, and caused other damages, in an amount to be determined at trial.

99. As a direct and proximate result of Defendants' defamatory publications, Bob Harvie for Congress has been forced to divert and reallocate campaign resources to respond to Defendants' false and defamatory publications to mitigate their effects and to sustain Harvie's principal campaign committee's mission to elect Harvie as Representative in Congress for Pennsylvania's 1st Congressional District in the November 3, 2026 General Election.

100. Defendants' conduct is not politics as usual. As shown by doubling down on their escalating rhetoric, Defendants' conduct is willful, wanton, malicious, and undertaken with actual malice and reckless indifference to Harvie's rights, thereby entitling Harvie to recover punitive damages.

WHEREFORE, Plaintiffs Bob Harvie and Bob Harvie for Congress respectfully request this Court enter judgment in their favor and against Defendants, and award compensatory damages, presumed damages, punitive damages, and attorney fees in excess of \$150,000 as well as costs of suit, as permitted by law, and such other relief as the Court deems just and proper.

Count II
False Light Invasion of Privacy
(Plaintiffs Bob Harvie and Bob Harvie for Congress Against All Defendants)

101. Plaintiffs Bob Harvie and Bob Harvie for Congress incorporate by reference the allegations contained in the preceding paragraphs as though fully set forth.

102. Defendants give widespread publicity to matters concerning Harvie by publishing and repeatedly republishing statements through a dedicated website, social media posts, email communications, and video.

103. Through those publications, Defendants falsely portray Harvie as corrupt, under an FBI criminal investigation, engaging in an extramarital relationship with a Bucks County employee, and misusing his public office to promote a Bucks County employee.

104. Defendants create this false impression by selectively publicizing portions of the publicly available facts while omitting material facts, including that Harvie appeared before the federal grand jury as a witness, not as the subject or target of the FBI's investigation; no criminal charges were filed against Harvie; no public accusation of wrongdoing was ever made against him; Harvie publicly denied he was under investigation; and independent public reporting continues to confirm that Harvie was not under FBI investigation.

105. By omitting these material facts while repeatedly describing Harvie as the "subject of an FBI investigation," an "FBI corruption subject," an "FBI criminal corruption subject," and otherwise associating him with corruption and criminal wrongdoing, Defendants are intentionally publicizing Harvie in a false light.

106. Likewise, Defendants made no effort to verify the truth of a Facebook post that they republished on their website directly accusing Harvie of engaging in an extramarital relationship with a Bucks County employee while serving as Bucks County Commissioner and misusing his public office to promote a Bucks County employee.

107. The false light in which Defendants place Harvie would be highly offensive to a reasonable person.

108. Defendants know that the false impression created by their publications is false or act with reckless disregard for the falsity of the matters publicized and the false light in which those publications place Harvie.

109. As a direct and proximate result of Defendants' defamatory publications, Harvie suffers serious injury to his reputation and standing in the community, including among residents in Bucks County and Pennsylvania's 1st Congressional District, both during and after his campaign for Representative in Congress for Pennsylvania's 1st Congressional District.

110. In Defendants' concerted effort to diminish public confidence in Harvie's integrity and fitness for public office, Defendants' publications have harmed his personal and professional reputation built over more than two decades of public service, caused emotional distress, and caused other damages, in an amount to be determined at trial.

111. As a direct and proximate result of Defendants' defamatory publications, Bob Harvie for Congress has been forced to divert and reallocate campaign resources to respond to Defendants' false and defamatory publications to mitigate their effects and to sustain Harvie's principal campaign committee's mission to elect Harvie as Representative in Congress for Pennsylvania's 1st Congressional District in the November 3, 2026 General Election.

112. Defendants' conduct is not politics as usual. As shown by doubling down on their escalating rhetoric, Defendants' conduct is willful, wanton, malicious, and undertaken with actual malice and reckless indifference to Harvie's rights, thereby entitling Harvie to recover punitive damages.

WHEREFORE, Plaintiffs Bob Harvie and Bob Harvie for Congress respectfully request this Court enter judgment in their favor and against Defendants, and award compensatory damages,

presumed damages, punitive damages, and attorney fees in excess of \$150,000 as well as costs of suit, as permitted by law, and such other relief as the Court deems just and proper.

Dated: August 5, 2026

Respectfully submitted,

/s/ Timothy J. Ford

Timothy J. Ford (Pa. Id. No. 325290)

Marion Barker Taylor (Pa. Id. No. 332672)

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Plaintiffs demand trial by jury on all issues so triable.

Dated: August 5, 2026

Respectfully submitted,

/s/ Timothy J. Ford

Timothy J. Ford (Pa. Id. No. 325290)

Marion Barker Taylor (Pa. Id. No. 332672)

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