

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

REPUBLIC OF AZERBAIJAN,

Plaintiff,

v.

CABLE NEWS NETWORK, INC.,

Defendant.

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C.A. No.: 1:26-cv-____ - ____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff, the Republic of Azerbaijan (“Azerbaijan” or “Plaintiff”), by and through its undersigned counsel, brings this defamation complaint against Defendant Cable News Network, Inc. (“CNN” or “Defendant”) for intentionally falsely reporting that Azerbaijan permitted Israel to use its territory to launch attacks against Iran, causing immeasurable reputational harm to Azerbaijan and endangering Azerbaijani civilians.

INTRODUCTION

1. On March 5, 2026, four drones penetrated Azerbaijani airspace and struck several targets. One of the drones exploded near a secondary school, injuring two civilians. Another damaged a terminal at the nearby Nakhchivan Airport.

2. Five days earlier, war had broken out between Iran, on the one hand, and the United States and Israel, on the other (the “Iran War”).

3. Azerbaijan, which shares a border with Iran to the south, is not and has never been a participant in the Iran War.

4. Azerbaijan has not supported military operations by any of the warring nations.

5. Azerbaijan maintains a policy of neutrality and independence. Azerbaijan does not host any foreign military bases on its territory and, as a non-aligned state, maintains a strict official policy and legislative framework against foreign military footprints.

6. But, on June 5, 2026, CNN's reckless reporting threatened to drag Azerbaijan into war.

7. In a CNN World post titled "Exclusive: Israel sent troops to Azerbaijan during Iran war, sources say," CNN falsely claimed that Azerbaijan had allowed Israel to use its territory to launch attacks against Iran.

8. CNN's claims in this regard are demonstrably and knowingly false and recklessly exacerbate geopolitical tensions in an already volatile region.

9. Iran has previously justified attacks against its neighbors as retaliation on the grounds that its neighbors have provided material support to American and Israeli offensive operations.

10. For instance, Ali Larijani, a senior Iranian official, threatened: "The countries of the region must either prevent the use of their soil by America against Iran themselves, or we will."¹

11. Similarly, Iran's Islamic Revolutionary Guard Corps ("IRGC") has issued a press release unambiguously stating that "Countries that host the aggressor American military and have placed their land at the disposal of the aggressor criminals for attacks on Iran should be prepared

¹ *Iranian Official Vows Response to Attacks From US Military Bases* (March 7, 2026), The Hill, <https://thehill.com/policy/international/5773250-iran-vows-response-us-attacks/> (last visited August 16, 2026).

to receive a corresponding response, and should activate their civil defence [sic] units to safeguard the lives of their citizens and move them away from likely targets.”²

12. As the war has progressed, Ebrahim Rezaei, the Iranian Parliament’s Spokesman for National Security and Foreign Policy, has similarly made clear that “[t]he Gulf states that have stood alongside Trump in the Iran-America regime conflict should watch over their oil and gas wells. In defense of the security of the great Iranian nation, we have no red lines.” Iran has followed through on these statements and claimed responsibility for offensive operations against U.S. military targets in Gulf states.

13. Against this backdrop, CNN’s June 5, 2026 post (the “Defamatory Post”) is far more than irresponsible reporting. Instead, CNN’s false claims are precisely calibrated to draw Azerbaijan into a regional war.

14. Azerbaijan does not seek relief from the U.S. judiciary lightly. It has, in fact, made multiple efforts to set the record straight, efforts repeatedly ignored by CNN.

15. First, in early June, Azerbaijani government officials participated in an “on the record” email exchange with CNN, and expressly denied that any staging of Israeli operations took place on Azerbaijani territory.

16. On June 6, 2026, immediately after the Defamatory Post was published, Azerbaijan’s Ambassador to the United States wrote to CNN reiterating that no staging of Israeli forces in Azerbaijani territory was authorized or occurred and demanding a formal retraction.

17. Subsequent retraction requests have since been made through counsel.

18. CNN’s response: a promise to investigate, followed by radio silence.

² IRGC Issues Stern Warning to Arab States Hosting US Bases (July 18, 2026), Iranian University Students News, <https://iusnews.ir/en/news-details/560254/IRGC-issues-stern-warning-to-Arab-states-hosting-US-bases/> (last visited August 16, 2026).

19. Ultimately, CNN has simply ignored Azerbaijan's multiple attempts to resolve this matter by retracting, thereby recklessly endangering Azerbaijan and its people.

20. Accordingly, Azerbaijan has been compelled to file this action in an effort to address CNN's willful misconduct.

PARTIES

21. Plaintiff, the Republic of Azerbaijan, is a sovereign foreign nation.

22. Defendant CNN is an American multinational news media company incorporated in Delaware.

JURISDICTION AND VENUE

23. This Court has jurisdiction pursuant to 28 U.S.C. § 1332. The amount in controversy exceeds \$75,000 and the suit is between a foreign state and a citizen of the United States.

24. This Court has personal jurisdiction over CNN because it is incorporated in Delaware.

25. Venue is proper under 28 U.S.C. § 1391(b)(1) because CNN resides in Delaware.

MATTER OF FIRST IMPRESSION

26. This case presents a novel legal question: whether a foreign sovereign may maintain an action for defamation against an American media organization that falsely reports that the foreign nation secretly facilitated military operations against a foreign state. Neither the Supreme Court, nor courts in this Circuit, have resolved that question.

27. Azerbaijan does not dispute that a domestic governmental entity cannot maintain a defamation action. *See, e.g., City of Chicago v. Trib. Co.*, 307 Ill. 595 (1923). That rule, however, is a creature of the First Amendment's protection of the American public's right to criticize its own government free from the threat of seditious-libel liability. Its rationale has no application to

a foreign sovereign, which is not accountable to the American electorate. No court in this Circuit has extended this rule to bar suit by foreign states.

28. As a sovereign state recognized by the United States and with which the United States maintains peaceful relations, Azerbaijan may sue in U.S. courts; a well-established legal principle dating back centuries. *See The Sapphire*, 78 U.S. 164, 1870 WL 12826, at *3 (1870) (“A foreign sovereign . . . who has a demand of a civil nature against any person here, may prosecute it in our courts.”).

29. Given Azerbaijan’s right to appear as a plaintiff in U.S. courts, personal jurisdiction over CNN, and this Court’s subject matter jurisdiction over the dispute, neither the Constitution nor principles of international comity bar it from seeking redress for reckless reporting threatening its populace.

30. In short, Azerbaijan has a legitimate interest in its international reputation and in the safety and well-being of its people.

31. Allegations that a sovereign state secretly facilitated military operations against a neighboring country are not mere rhetorical criticism or statements of opinion. They are extraordinarily dangerous factual assertions that can and will be disproved at trial.

GENERAL ALLEGATIONS

I. Azerbaijan’s Independence and Policy of Neutrality and Balanced Foreign Relations

32. In 1991, after decades as the Azerbaijan Soviet Socialist Republic, Azerbaijan regained its independence from the Soviet Union.³

³ *Chronology of Events*, USCDORNSIFE: INSTITUTE OF ARMENIAN STUDIES, <https://dornsife.usc.edu/armenian/initiatives/resources-on-karabakh/chronology-of-events/> (last visited August 16, 2026).

33. Once independent, Azerbaijan pursued a deliberate foreign policy to safeguard its sovereignty and maintain balanced relations with the surrounding major powers and other countries.⁴

34. Consistent with this policy, Azerbaijan and Israel developed a mutually beneficial commercial relationship.⁵

35. By various means, Iranian officials openly criticized the deepening partnership between Azerbaijan and the State of Israel, with Iran officially declining to recognize it.⁶

36. By 2025, Azerbaijan's multifaceted foreign policy approach was publicly described as a key pillar of its sovereignty and stability, as Azerbaijan maintained a diverse set of allies while refraining from providing direct military aid.

II. The Iran War and Drone Strikes on Azerbaijani Territory

37. On March 4, 2026, Rahman Moggaddam (who led the IRGC's intelligence division) was killed as part of the joint U.S.—Israel attack.⁷

⁴ *The Azerbaijan-Turkmenistan-Uzbekistan trilateral meeting* (Oct. 10, 2025), NATO DEFENSE COLLEGE FOUNDATION, <https://www.natofoundation.org/central-asia/the-azerbaijan-turkmenistan-uzbekistan-trilateral-meeting/> (last visited August 16, 2026); Vasif Huseynov, *Azerbaijan, Israel, and United States Seek Trilateral Cooperation Format* (Mar. 26, 2025), JAMESTOWN, <https://jamestown.org/azerbaijan-israel-and-united-states-seek-trilateral-cooperation-format/> (last visited August 16, 2026).

⁵ *Azerbaijan and the emerging alliance reshaping the Middle East* (June 19, 2026), EUREPORTER, <https://www.eureporter.co/azerbaijan/2026/06/19/azerbaijan-and-the-emerging-alliance-reshaping-the-middle-east/> (last visited August 16, 2026); Ariel Cohen, *Israel-Azerbaijan Energy Deal Strengthens Strategic Partnership* (Nov. 13, 2023), FORBES, <https://www.forbes.com/sites/arielcohen/2023/11/13/israel-azerbaijan-energy-deal-strengthens-strategic-partnership/> (last visited August 16, 2026).

⁶ Elie Houé, *Alignment and Restraint: Azerbaijan following the 2026 Iran War* (July 7, 2026), THE INSTITUTE FOR NATIONAL SECURITY STUDIES, <https://www.inss.org.il/publication/azerbaijan-iran-war/> (last visited August 16, 2026).

⁷ Shavlev & Lister, *Exclusive: Israel sent troops to Azerbaijan during Iran war as part of secret network across region, sources say* (June 5, 2026), CNN,

38. On March 5, 2026, the very next day, drones penetrated Azerbaijani airspace near both a school in the Babek district and the Nakhchivan International Airport terminal, injuring civilians.⁸

39. Azerbaijan condemned the attack in strictest terms, while Iran denied responsibility and promised investigation.⁹

40. The immediate crisis de-escalated through diplomatic engagement and humanitarian aid shipments to Iran, and the Embassy of Azerbaijan resumed its normal operations in Tehran.¹⁰

III. CNN's Falsely and Recklessly Reports That Azerbaijan Assisted Israeli Strikes Against Iran

41. On June 5, 2026, CNN published the Defamatory Post, attached as Exhibit A, which contained false and misleading statements about Azerbaijan's involvement in the 2026 Iran War.¹¹

42. The Defamatory Post makes and promotes the defamatory assertion that "Israel secretly deployed elite military and intelligence units to Azerbaijan" and that Israel operated from

<https://www.cnn.com/2026/06/05/middleeast/azerbaijan-israel-iran-war-intl> (last visited August 16, 2026).

⁸ Joe Fisher, *Drones strike airport, school in Azerbaijan; Iran denies involvement* (Mar. 5, 2026), UPI, https://www.upi.com/Top_News/World-News/2026/03/05/iran-azerbaijan-airport-drone-strike/4461772722313/ (last visited August 16, 2026).

⁹ *Aliyev calls Iranian drone strike on Azerbaijan's Nakhchivan a 'terrorist act'* (Mar. 6, 2026), THE JERUSALEM POST, <https://www.jpost.com/middle-east/iran-news/article-889075> (last visited August 16, 2026).

¹⁰ Elie Houé, *Alignment and Restraint: Azerbaijan following the 2026 Iran War* (July 7, 2026), THE INSTITUTE FOR NATIONAL SECURITY STUDIES, <https://www.inss.org.il/publication/azerbaijan-iran-war/> (last visited August 16, 2026).

¹¹ *Supra* n. 7.

bases inside Azerbaijan during the war, thereby positioning Azerbaijan as part of a clandestine network facilitating strikes against Iran.¹²

43. The Defamatory Post also falsely reports, citing unnamed sources, that Israel sent troops to Azerbaijan as part of a “secret network,” including special commando deployments for intelligence-gathering and drone operations from “several locations in southern Azerbaijan.”¹³

44. Specifically, CNN’s post states that Israeli special forces “operated out of several locations in southern Azerbaijan” that are “adjacent to Iran’s northern border and, at its closest point, only about 60 miles from the Iranian city of Tabriz”

45. The Defamatory Post also falsely claims that Israel conducted preliminary operations in Azerbaijan to lay the groundwork for further steps by installing listening devices and intelligence equipment in the area.¹⁴

46. In addition, it falsely asserts that a key operation was launched from Azerbaijan: the March 4 killing of Rahman Moghaddam, who led the IRGC’s intelligence division.¹⁵

IV. The Defamatory Post Is Questioned By Experts Yet Widely Disseminated

47. In the aftermath of the Defamatory Post, independent commentators noted fundamental issues with CNN’s reporting. For instance, former IDF Military Intelligence officer Alexander Grinberg noted that the report “rests on claims that cannot be independently verified from the evidence it presents. Its central allegations rely entirely on anonymous sources whose proximity to the alleged operations, institutional affiliations, and possible interests are not

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

disclosed. The result is that readers are asked to accept an exceptionally consequential account largely on the strength of the network's own assurance."¹⁶

48. Nonetheless, precisely because of CNN's reputation as a reliable news source, the Defamatory Post immediately sent waves through diplomatic circles. This was an obvious and foreseeable consequence of its publication. For instance, one commentator noted that the Defamatory Post "gave Iran a valuable instrument with which to reinforce one of its longstanding regional narratives: that Azerbaijan serves as a platform for Israeli military and intelligence operations against the Islamic Republic."¹⁷

49. Iranian and other news sources subsequently amplified CNN's false report. For instance, state and semi-state Iranian publications, such as Mashregh News, Tabnak, and Iranian Labor News Agency, each published Farsi-language articles for domestic audiences accusing Azerbaijan of becoming a secret partner in Israeli operations against Iran.

V. Azerbaijan Repeatedly Demands That CNN to Retract The Defamatory Post

50. Faced with the risk of violence stemming from CNN's false report and wanting to correct the false statements in the Defamatory Post, Azerbaijan immediately sought a retraction from CNN. When retraction demands from its diplomatic staff received no substantive response, Azerbaijan retained counsel and sent multiple letters to CNN seeking correction of CNN's erroneous reporting.

51. On June 23, 2026, counsel for Azerbaijan sent CNN a letter demanding the immediate retraction and correction of CNN's Defamatory Post.

¹⁶ Maj (res.) Alexander Grinberg, *How Iran Turns Western Reporting Into Strategic Validation* (July 29, 2026), Jerusalem Institute for Strategy and Security, <https://jiss.org.il/en/grinberg-how-iran-turns-western-reporting-into-strategic-validation/> (last visited August 16, 2026).

¹⁷ *Id.*

52. The June 23, 2026 demand letter underscores the gravity of the false and reckless assertions in CNN's Defamatory Post, and notes that Azerbaijan was recently struck by drones launched from Iranian territory.

53. It further notes that CNN failed to substantively respond to a formal demand for retraction and correction from the Embassy of Azerbaijan.

54. CNN did not respond to the June 23, 2026 demand letter.

55. On July 2, 2026, Azerbaijan's counsel sent CNN an additional letter demanding the immediate retraction and correction of the Defamatory Post.

56. On July 9, 2026, CNN responded to the July 2 demand letter declining Azerbaijan's demand for retraction.

57. The Defamatory Post is demonstrably false. Azerbaijan does not host any foreign military bases on its territory and, as a non-aligned state, maintains a strict official policy and legislative framework against foreign military footprints.

58. CNN had notice, both before and after publishing the Defamatory Post, that the assertions in the Defamatory Post were false and dangerous, yet chose to publish and refused to retract the Defamatory Post.

59. CNN's Defamatory Post intentionally undermines regional security and puts international relations and the lives of Azerbaijani citizens at risk.¹⁸

¹⁸ Sevil Seymur, *MEDIA: CNN's allegations regarding Azerbaijan are gross information manipulation* (June 5, 2026), REPORT INFORMASIYA AGENTLIYI, <https://report.az/en/domestic-politics/media-cnn-s-disinformation-regarding-azerbaijan-is-political-provocation> (last visited August 16, 2026).

VI. The Defamatory Post Authors Have A History of Biased, False Reporting About Azerbaijan

60. The Defamatory Post was authored by journalists known to CNN to have previously engaged in false reporting about Azerbaijan.

61. Tim Lister, one of the authors of the Defamatory Post, is a regular CNN contributor and producer. He formerly held management positions at CNN as an executive editor and Vice President. During the liberation of the internationally recognized territories of Azerbaijan from the unlawful military occupation of Armenia in 2020, as well as the local counter-terrorism measures aimed at disarming and completely forcing out the remnants of the armed forces of Armenia from Azerbaijan, Lister authored multiple articles falsely framing Azerbaijan as the aggressor and emphasizing criticism of Azerbaijan.¹⁹

62. Lister also falsely accused Azerbaijan of recruiting and hosting Syrian National Army mercenaries on Azeri soil to assist in fighting against Armenia.²⁰ As here, the accusations

¹⁹ See Lister, Chernova, Edwards, & Gigova, *Azerbaijan says it has retaken breakaway Armenian enclave after separatists surrender* (Sept. 21, 2023), CNN, <https://edition.cnn.com/2023/09/20/asia/nagorno-karabakh-russia-ceasefire-intl> (last visited August 16, 2026); Lister, Mezzofiore, Edwards, Chernova & Walsh, *Azerbaijan launches operation against Armenian forces in Nagorno-Karabakh* (Sept. 20, 2023), CNN, <https://www.cnn.com/2023/09/19/asia/armenia-azerbaijan-nagorno-karabakh-bombardment-intl> (last visited August 16, 2026); Tim Lister, *US, France, Russia call for ceasefire as fighting rages in Nagorno Karabakh* (Oct. 5, 2020), CNN, <https://edition.cnn.com/2020/10/05/europe/nagorno-karabakh-ceasefire-call-intl> (last visited August 16, 2026); Lister, Mezzofiore, Edwards, Chernova & Walsh, *Azerbaijan launches operation against Armenian forces in Nagorno-Karabakh* (Sept. 20, 2023), CNN, <https://www.cnn.com/2023/09/19/asia/armenia-azerbaijan-nagorno-karabakh-bombardment-intl> (last visited August 16, 2026); Lister, Chernova, Edwards, & Gigova, *Azerbaijan says it has retaken breakaway Armenian enclave after separatists surrender* (Sept. 21, 2023), CNN, <https://edition.cnn.com/2023/09/20/asia/nagorno-karabakh-russia-ceasefire-intl> (last visited August 16, 2026).

²⁰ Khadder, Tuysuz, & Lister, *Rebels from Syria Recruited to Fight in Conflict between Azerbaijan and Armenia, source says* (Oct. 1, 2020), CNN, <https://www.cnn.com/2020/10/01/middleeast/azerbaijan-armenia-syrian-rebels-intl> (last visited August 16, 2026).

made by Lister were demonstrably false, backed solely by unnamed sources, and designed to inflame tensions in the midst of an international conflict.

63. CNN was and is fully aware of Lister's anti-Azerbaijan bias.

COUNT I
(Defamation)

64. Plaintiff repeats and realleges each and every foregoing allegation as if fully set forth herein.

65. CNN published the Defamatory Post to third parties. The Defamatory Post is of and concerning Azerbaijan: it names Azerbaijan as the state that allowed Israel to use its territory to launch attacks against Iran. A reasonable reader would understand the Defamatory Post's statements as defamatory of Azerbaijan because they assert that Azerbaijan secretly facilitated military operations against a neighboring state in breach of its declared neutrality.

66. False statements of fact in the Defamatory Post include that Israeli forces "operated out of several locations in southern Azerbaijan," "deployed to the location [in Azerbaijan]" and conducted intelligence and drone operations against Iran from there, and that one of the key operations "launched from Azerbaijan" was the March 4 killing of an IRGC intelligence chief.

67. The Defamatory Post was made with actual malice, *i.e.*, with knowledge that its statements were false or with reckless disregard for their truth or falsity. The individuals responsible for authoring, editing, and publishing the Defamatory Post, including Ms. Shalev and Mr. Lister, and CNN editors acted with actual malice. Before publication, Azerbaijan government officials expressly denied that any Israeli operations occurred on Azerbaijani territory. CNN knew that Mr. Lister had previously authored reporting about Azerbaijan that was demonstrably false and sourced solely to unnamed sources. Independent experts identified that the Defamatory Post rested entirely on undisclosed anonymous sources whose reliability could not be verified. Taken

together, these facts establish that those responsible for publishing the Defamatory Post did so with knowledge of, or reckless disregard for, its falsity.

68. CNN's false reporting caused reputational harm to Azerbaijan and threatens tenuous international relations.

COUNT II
(Prima Facie Tort Under Delaware Law)

69. Plaintiff repeats and realleges each and every foregoing allegation as if fully set forth herein.

70. CNN intentionally published the Defamatory Post with the intent to cause harm to Azerbaijan.

71. CNN acted without sufficient justification or excuse in publishing the Defamatory Post after being put on notice of its falsity and the dangers it posed to Azerbaijan's sovereignty and citizenry.

72. CNN's conduct was intended to injure Azerbaijan.

73. As a direct and proximate result of CNN's decision to publish and refusal to retract the Defamatory Post, Azerbaijan has suffered damages, including harm to its international reputation and a demonstrated risk of harm to Azerbaijani civilians.

WHEREFORE, Plaintiff respectfully requests this Court enter judgment in favor of Azerbaijan and against CNN and:

- a. Award damages in an amount to be determined at trial;
- b. Award pre-judgment and post-judgment interest;
- c. Direct CNN to publish a full, conspicuous, and unequivocal retraction of the Defamatory Post;

- d. Direct CNN to remove the Defamatory Post from its website, print editions, social media feeds, and all digital archives under CNN's control; and
- e. Award such further relief as the Court may deem just and proper.

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