UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PRESIDENT DONALD J. TRUMP, an individual, Plaintiff	)	
v.	)	No. 25-cv-1227
BRITISH BROADCASTING CORP. (a/k/a BBC) Defendant	)	Filed: Nov. 13, 2025

COMPLAINT

1. This action concerns a false, defamatory, deceptive, disparaging, inflammatory, and malicious depiction of President Trump, which was published in a BBC *Panorama* documentary, that was fabricated and aired by the Defendant one week before the 2024 Presidential Election in a brazen attempt to interfere in and influence the Election's outcome to President Trump's detriment.

2. In the BBC *Panorama* documentary titled "Trump: A Second Chance" (the "*Panorama* Documentary" or the "Documentary"),[1] which was first broadcast on October 28, 2024, the BBC intentionally and maliciously sought to fully mislead its viewers around the world by splicing together two entirely separate parts of President Trump's Speech on January 6, 2021 (the "Speech").[2]

* * *

6. As set forth in a damning and recently leaked BBC internal whistleblower document, the BBC intentionally used the *Panorama* Documentary to maliciously, falsely, and defamatorily make it appear that President Trump explicitly called for violent action and rioting, and that he "said something he did not," by splicing together footage from the start of the Speech with a separate quote that he said nearly 55 minutes later, while omitting his statement calling for peace, made less than one minute after his first statement urging supports to cheer their senators and congressmen at the Capitol. Such distortion of the President's speech by the BBC "materially misled viewers."

7. Moreover, concerns about the *Panorama* Documentary were raised internally before its dissemination, but the BBC ignored those concerns and did not take corrective action.

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[1] First published by Defendant on October 28, 2024 with a runtime of 57:54. *See* "Trump: A Second Chance?", BBC (Oct. 28, 2024) (https://www.bbc.co.uk/programmes/m0024h6r).

[2] The Speech was 70:53 in length.

8. Accordingly, President Trump brings this action for compensatory and punitive damages for the extensive reputational harm inflicted upon him by the Defendant.

* * *

Parties

11. Plaintiff, President Trump, is a citizen of the United States and a citizen of the State of Florida. He served as the 45th President of the United States and currently serves as the 47th President of the United States.

12. Defendant, British Broadcasting Company ("BBC), is a British corporation established by royal charter and operating under an agreement with the United Kingdom's Secretary of State for Culture, Media, and Sport, with its principal place of business in London, England. The BBC produced and published the *Panorama* Documentary.

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Jurisdiction and Venue

21. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1332(a)(2). The parties are completely diverse, as President Trump is a citizen of Florida, while Defendant is a citizen of the United Kingdom, and the amount in controversy exceeds $75,000.00, exclusive of interest and costs.

22. Defendant, during the operative period alleged in this Complaint, engaged in substantial and not isolated business activities in Florida, and more specifically in this District. Defendant publishes online news reports, editorials, and other media content at https://www.bbc.com, which are regularly accessed by individuals in Florida.

23. BBC operates in the United States not as an abstract concept but in a constant manner. BBC has a concrete and continuous presence in the United States, including in Florida, where it maintains an office, at 255 Alhambra Circle, Suite 1000, Coral Gables, FL 33134. Non-party BBC Studios Americas Inc., a BBC subsidiary, also operates out of this location.

24. BBC also intentionally, purposefully, and continuously transmits news content and other information into Florida. For example, the BBC offers web pages entitled "Florida – BBC News" and "Florida – BBC Weather," among others. The BBC also offers web pages specific to cities in Florida.

25. Additionally, BBC offers subscriptions to individuals in Florida and as a result, has thousands of subscribers in Florida. Any individual in the United States, including Florida, can pay for a subscription to the BBC's content and services.

26. Individuals in the United States, including Florida, also have another option for consuming content produced by the BBC—the *BritBox* by BBC subscription streaming platform. *BritBox* is available in the United States, including in Florida, and has thousands of subscribers in Florida. *BritBox* offers American subscribers, including Floridians, access to a substantial amount of the BBC's original content.

* * *

27. The *Panorama* Documentary was available to be viewed by citizens of Florida and was, in fact, viewed in Florida by citizens of Florida, notwithstanding the BBC's anticipated and inaccurate claims that the Documentary was unviewable in the United States due to purported geo-locking. As disgraced, and now former, BBC Director General Tim Davie ("Davie") stated in his recent resignation letter: "Despite a hugely competitive market, I am proud that the BBC remains the most trusted news brand *globally*. We have continued to ensure that it is used by almost everyone in the UK as well as hundreds of millions of people *globally*."

28. The *Panorama* Documentary was available to *BritBox* subscribers in Florida and was in fact viewed by these subscribers through *BritBox* and other means provided by the BBC.

29. In addition to access through various means, including *BritBox*, it is well established that millions of Florida citizens use a virtual private network ("VPN") to view content such as the *Panorama* Documentary, which is aired on foreign streaming platforms such as BBC iPlayer, without paying for a subscription.

30. According to *vpnMentor*, a VPN research firm, VPN usage in Florida has skyrocketed since 2024, with a 51% increase in demand on December 19, 2024, and an over 1,000% increase in VPN usage at the beginning of 2025.

31. To that end, an article published by *Tom's Guide*, a reputable technology news outlet, revealed that a VPN usage survey showed that approximately 41% of VPN subscribers use the service to stream content, citing BBC iPlayer as an example of what a VPN subscriber could view using a VPN.

32. *Panorama* Documentary's publicity, coupled with significant increases in VPN usage in Florida since its debut, establishes the immense likelihood that citizens of Florida accessed the Documentary before the BBC had it removed.

33. BBC elected to publish the *Panorama* Documentary just one week before the 2024 United States Presidential Election with the express intent of interfering with it and trying to undermine President Trump's odds of winning reelection.

34. BBC explicitly instructed and ordered its producers to utilize this forum for the purpose of creating the Documentary and defaming President Trump.

35. The *Panorama* Documentary contains extensive footage of places and events in Florida as an essential component of the documentary. These include:

(a) Various wide-angle footage of Mar-a-Lago and the surrounding area;

(b) Footage of an April 2023 rally near Mar-a-Lago, including:

(i) Supporters of President Trump lining the streets as his motorcade proceeded through Palm Beach on the way to Mar-a-Lago (4:03);

(ii) President Trump as he walked into Mar-a-Lago to deliver remarks to his supporters (5:11);

(iii) Supporters of President Trump cheering for the President as he prepared to speak inside Mar-a-Lago (5:24)

(iv) President Trump as he delivered remarks to supporters inside Mar-a-Lago (5:27).

* * *

41. The spliced-together version of President Trump's Speech that are depicted in the *Panorama* Documentary wrongly made it appear that he said: "*We're going to walk down to the Capitol, and I'll be there with you. And we fight. We fight like hell and if you don't fight like hell, you're not going to have a country anymore*." (Falsely depicted at 33:53 of the Documentary).

42. This fabricated depiction of President Trump during the Speech was false, deceptive, and defamatory.

43. President Trump's actual and full remarks during the Speech were separated by nearly 55 minutes.

44. At 12:12 p.m. on January 6, 2021, 14:52 into the speech, President Trump said: "*Now it is up to Congress to confront this egregious assault on our democracy. And after this, we're going to walk down and I'll be there with you. We're going to walk down, we're going to walk down. Anyone you want but I think right here, we're going to walk down to the Capitol and we're going to cheer on our brave senators and congressman and women and we're probably not going to be cheering so much for some of them.*" (Remarks made on January 6, 2021, 12:12 p.m. Eastern Standard Time, 14:52 into the Speech).

45. Nearly 55 minutes later, 69:30 into the speech, President Trump said: "*[B]ut I said 'Something's wrong here, Something's really wrong, can't have happened.' And we fight, we fight like hell, and if you don't fight like hell, you're not going to have a country anymore.*" (Remarks made on January 6, 2021 at 1:07 p.m. Eastern Standard Time, 69:30 into the Speech).

46. These false, deceptive, malicious, and defamatory statements and depictions of and about President Trump, were, intentionally, with actual malice, and without privilege, published in the *Panorama* Documentary.

* * *

50. Davie and News CEO Deborah Turness resigned in disgrace over their leading roles in the *Panorama* Documentary.

51. Following a demand from President Trump's attorney, BBC's counsel indicated that the BBC would apologize to President Trump, although the apology continued to attempt to deny intentional wrongdoing and declined to pay damages.

52. Enclosed with the letter from counsel was a letter of apology from Chairman Shah, which stated, *inter alia*:

> Let me address immediately your speech of 6 January 2021. The way the speech was edited in the documentary gave a misleading impression of what you said. The editing unintentionally created the impression of a single, continuous section of your speech, rather than excerpts from different points in the speech. ***This gave the mistaken impression that you had made a direct call for violent action***. ***That was an editorial error and it should not have happened***. ***I have stated clearly and publicly that the BBC apologises for that error of judgement***. As it was your speech that was edited in a misleading way, and you were the object of that editorial error, I would also like to apologise to you directly for this mistake.

53. The BBC then published the following apology on its "Corrections and Clarifications" page, which was also included in the November 13 letter:

> Panorama – Trump: A Second Chance? 28 October 2024
>
> This programme was reviewed after criticism of how President Donald Trump's 6th January 2021 speech was edited.
>
> During that sequence, we showed excerpts taken from different parts of the speech.
>
> However, we accept that our edit unintentionally created the impression that we were showing a single continuous section of the speech, rather than excerpts from different points in the speech, *and* ***that this gave the mistaken impression that President Trump had made a direct call for violent action***.
>
> The BBC would like to apologise to President Trump for that ***error of judgment***.
>
> This programme was not scheduled to be re-broadcast and will not be broadcast again in this form on any BBC platforms.

* * *

Actual Malice

58. The documentary was published on October 28, 2024. At the time, President Trump did not hold public office due to the Hoax of the 2020 Election. As such, pursuant to Florida law, he is not required to plead or prove actual malice.

59. Even if he must plead or prove actual malice, and contrary to the BBC's claim that its splicing, manipulation, and distortion of the Speech was an unintentional "editorial error," substantial evidence suggests that this was an intentional and malicious effort to falsely and deceptively portray President Trump as having called for violent action on January 6, 2021.

60. As an initial matter of common sense, it would have been impossible for BBC's journalists and producers to splice together two distinct parts of the Speech from nearly 55 minutes apart unless they were acting intentionally. Such a dramatic distortion could never have occurred by accident. Two distinct parts of a speech from nearly 55 minutes apart do not inadvertently become spliced or linked together without effort, knowledge, and purpose. Moreover, "an error of judgment," as admitted to by the BBC, includes an intentional act.

61. The BBC's actual malice is further compounded by its prior acts that unequivocally demonstrate that the organization has been anything but fair and impartial when it comes to reporting on President Trump. Substantial evidence demonstrates that before the publication of the *Panorama* Documentary, the BBC and its leadership bore President Trump ill will, wanted him to lose the 2024 Presidential Election, and were dishonest in their coverage of him.

62. The BBC, its journalists, and its producers knew at and prior to the time they published the *Panorama* Documentary that the BBC's depiction of President Trump's Speech was false.

63. These false, deceptive, malicious, and defamatory statements and depictions of and about President Trump, were, intentionally, with actual malice, and without privilege, published in the *Panorama* Documentary.

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69. In the early Summer of 2025, Michael Prescott, a journalist who until June 2025 was an independent adviser to the BBC's Editorial Guidelines and Standards Committee ("EGSC"), sent an internal memorandum (the "Memorandum") to the BBC Board "expos[ing] a string of incidents that demonstrate serious bias in the

corporation's reporting;" following the leak of the Memorandum, *The Telegraph* published the Memorandum in early November 2025.

70. Prescott highlighted a litany of disturbing misconduct demonstrating how far the BBC has strayed from accepted standards of journalistic integrity, including, but not limited to, the BBC's tampering with President Trump's Speech in the Documentary.

71. Notably, Prescott is nonpartisan, as he wrote in the Memorandum:

> I think it is important to state that I have never been a member of any political party and do not hold any hard and fast views on matters such as American politics or disputes in the Middle East. My views on the BBC's treatment of the subjects covered below do not come with any political agenda. Rather, what motivated me to prepare this note is despair at inaction by the BBC Executive when issues come to light. On no other occasion in my professional life have I witnessed what I did at the BBC with regard to how management dealt with (or failed to deal with) serious recurrent problems.

72. Regarding the *Panorama* Documentary, Prescott wrote:

> I watched the programme and found it to be neither balanced nor impartial—it seemed to be taking a distinctly anti-Trump stance. Critics of the Republican presidential candidate vastly outnumbered those who argued for him. What examination there was of reasons for Trump's popularity seemed to me insufficient given the overall balance of the programme. Given what I took to be the anti-Trump nature of the programme, I of course assumed there would be a similar, balancing Panorama programme about Democrat presidential candidate Kamala Harris the following week. I remain shocked that there was not.

73. Prescott concluded about the splicing of President Trump's Speech that:

> This was one of the most shocking sets of issues uncovered during my time with the EGSC. If BBC journalists are allowed to edit video in order to make people "say" things they never actually said, then what value are the Corporation's guidelines, why should the BBC be trusted, and where will this all end.

* * *

77. Such institutional bias and one-sidedness in BBC reporting about President Trump is not new. Criticisms have come from no less an authority than former British Prime Minister Liz Truss; Caroline Dinenage, head of the House of Commons' Culture, Media, and Sport; and Conservative Party Leaders and Member of Parliament Kemi Badenoch.

78. BBC's reporting reflected the views of President Trump's dishonest political enemies, including Liz Cheney and Robert Reich,

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82. President Trump suffered extensive economic harms from false, deceptive, malicious, and defamatory statements and depictions published with actual malice.

83. The value of President Trump's personal brand alone is reasonably estimated to be worth tens of billions of dollars. Business ventures bearing his name generate hundreds of millions of dollars of annual revenue. Moreover, the injury to President Trump's business and personal reputation inflicted by this Defendant, and its efforts to falsely, maliciously, and defamatorily portray President Trump as a violent insurrectionist, continue into the present, thereby causing massive economic damage to his brand value and significant damage and injury to his future financial prospects, in addition to continuing to harm his reputation as President of the United States of America.

84. President Trump's damages take the form of direct harm to his professional and occupational interests, including, without limitation, the value of his brand, properties, and businesses, and severe diminishment and tarnishing of his reputation as a politician, leader, and businessman in the eyes of the American public and around the world.

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<u>Count I</u>: Defamation

Served: January 19, 2026