

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

ALEXIS WILKINS,

Plaintiff,

v.

ELIJAH D. SCHAFFER,

Defendant.

Case No.:

JURY TRIAL DEMANDED

COMPLAINT

1. Defendant, Elijah D. Schaffer, has perpetuated a malicious lie about Alexis Wilkins, falsely claiming that she—an American-born country singer—is an agent of a foreign government, assigned to manipulate and compromise the Director of the FBI. Defendant, an internet personality who makes a living as a podcaster and political commentator—profiting on churning controversy and outrage—is using this fabricated narrative as self-enriching clickbait and has published it to his sizable audience, painting a target on Ms. Wilkins for no reason other her association with FBI Director Kash Patel. Accordingly, Ms. Wilkins seeks to hold Defendant accountable for his malicious and knowing lies.

PARTIES

2. Plaintiff, Alexis Wilkins, is a resident and citizen of the United States and the State of Tennessee.

3. Defendant, Elijah Schaffer, is an individual who is a resident and citizen of the State of Florida.

JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this cause of action pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship and the amount in controversy exceeds \$75,000.

5. Defendant is subject to personal jurisdiction in Florida because he is a Florida resident.

6. Venue for this action is proper pursuant to 28 U.S.C. § 1391 because Defendant resides in this District.

FACTUAL BACKGROUND

7. Ms. Wilkins is an American, born in the United States. She is a patriotic, conservative, Christian, country music artist and published writer, who also works for a conservative advocacy and educational company, PragerU.

8. She is in a long-term relationship with Kashyap “Kash” Patel, which began in January 2023. This was widely known, and Ms. Wilkins has posted photos of herself with Dir. Patel on Instagram as early as January 2024.¹ On November 30, 2024, newly re-elected President Donald J. Trump announced his intention to nominate Kash Patel as the next Director of the Federal Bureau of Investigation (“FBI”). On February 20, 2025, the U.S. Senate confirmed Dir. Patel to that position.

¹ Ms. Wilkins has posted many photos of herself with Kash Patel since then, both on Instagram and X.

9. Defendant is an internet personality and CEO of RiftTV. Defendant has over 841,800 followers on X, where his posts frequently reach tens of thousands of views and numerous re-posts. Defendant routinely posts politically charged content to generate controversy, prompting clicks, thereby driving engagement revenue.

10. Defendant generates income through X's official monetization program, which pays him ad revenue sharing, and rewards viral, high-engagement content. In other words, the more controversy Defendant generates with his content, the more he gets paid.

11. On September 14, 2025, X user, Hen Mazzig, published a lengthy and detailed post about the prominent role female Mossad agents have played in Israel's sophisticated intelligence efforts against Iran, including by "seducing top officials" and that "[s]ome of them reportedly seduced high-ranking enemy officials":


Hen Mazzig
 @HenMazzig

Mossad sent female operatives deep into Iran— seducing top officials, infiltrating government surveillance networks, and carrying out sabotage missions.

In one of the most audacious operations in its history, Mossad deployed dozens of female operatives into Iran earlier this year — with boots on the ground, executing missions that were critical to Israel's June strikes on Tehran's nuclear and ballistic missile programs.

According to JPost, Mossad Director David Barnea personally oversaw the unprecedented deployment, viewing the role of female agents as "very substantial" to Israel's success in the Israel-Iran war.

While the exact nature of their missions remains classified, past revelations suggest that these women are more than spies — they are field operatives capable of surveillance, sabotage, and even kinetic strikes. Some of them reportedly seduced high-ranking enemy officials, infiltrated Iran's most sensitive installations, and coordinated targeting data for Israeli fighter jets.

Barnea is said to have directed hundreds of operatives and local assets into action, running a complex network of Israeli spies and recruited Iranian dissidents to dismantle key elements of the ayatollahs' war machine. The operations were so effective that Iran managed to mount a counterstrike only on the second day of the war.

The report also reveals that Mossad now has precise intelligence on the location of Iran's enriched uranium stockpiles— information so sensitive that Israel could intervene again if Tehran attempts to weaponize its nuclear program.

In a rare public nod to the contribution of women in Israeli intelligence, a senior Mossad officer, known only as "G," with Iranian roots and expertise in recruiting foreign spies shared this with the paper. In 2024, she was honored with lighting a torch during Israel's Independence Day ceremony— a symbolic recognition of her covert contributions.

This latest operation signals a new era for Israel's legendary spy agency: one where female operatives are not only breaking barriers but also shaping the course of regional history.



Last edited 4:16 PM · Sep 14, 2025 · **2.1M** Views

 535
  1.5K
  7.3K
  2K
 

12. In a responsive comment (or quote-post), published that same day, September 14, 2025, Defendant posted—without caption—a photograph of Ms. Wilkins, arm-in-arm with Kash Patel, which she originally shared on her Instagram account in January 2024. In the photo, Ms. Wilkins and Patel are dressed up for a formal event, and Ms. Wilkins is wearing a fitted, red, halter neck, cocktail dress:



13. Defendant's post of the photo received massive engagement, with 1.5 million views, at least 38,000 likes, hundreds of comments, and thousands of re-posts and bookmarks.

14. While Defendant may not have included any caption to spell out the meaning of his post, he didn't have to. Ever since Kash Patel was appointed as Director of the FBI in February 2025, the conspiratorial corners of the internet and social media have been spreading a false narrative that Ms. Wilkins is an Israeli Mossad agent, spy, or "honeypot," who is only in a relationship with Kash Patel to spy on and manipulate the United States government. Defendant's wordless reply to Mr. Mazzig's lengthy description of female Mossad agents who "seduced high-ranking enemy officials," juxtaposing a carefully chosen photograph of Ms. Wilkins in a sleeveless red dress, embracing the Director of the FBI, unmistakably accuses Ms. Wilkins of being a Mossad agent for Israel, who has "seduced" Dir. Patel to compromise him—a honeypot. The insidious insinuation, understood by an ordinary viewer—as evidenced below—is that Ms. Wilkins is a spy for a foreign government, conducting espionage to undermine our national security and to manipulate federal law enforcement at the highest level, and even committing treason. These accusations are all categorically false, and Defendant knows it.

15. Defendant's viewers interpreted his post to be calling Ms. Wilkins a Mossad agent. In response, one X user stated, "[i]magine her face when MOSSAD

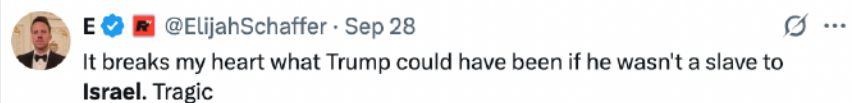
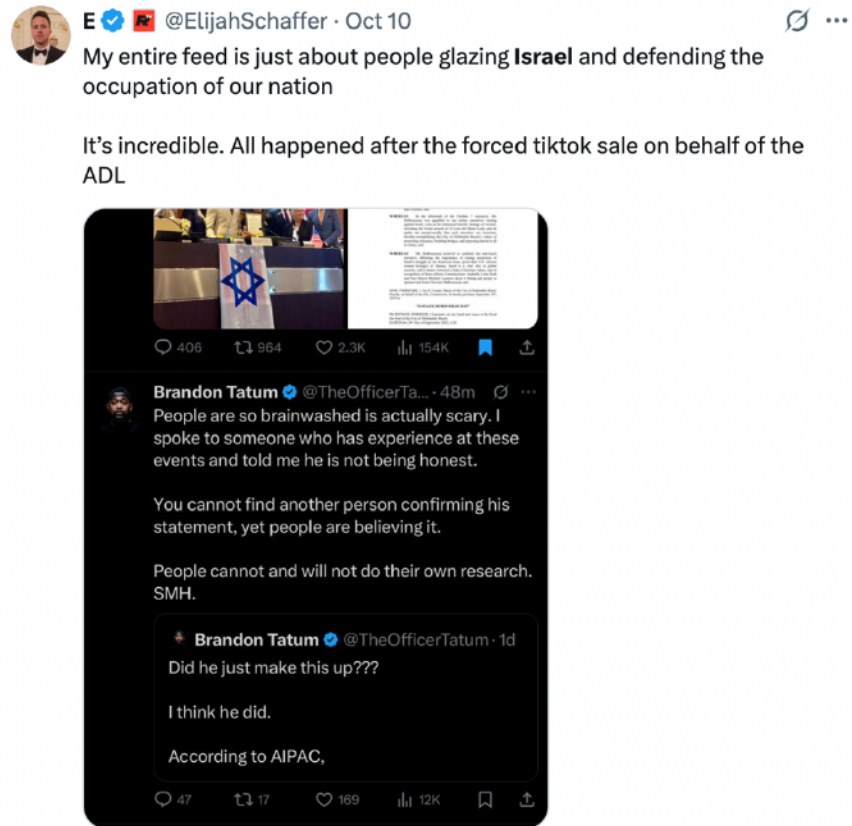
told her what her job was going to be,” and another stated that Dir. Patel “was offered a Mossad wifey”:



16. Defendant intended this defamatory implication.

17. Defendant frequently posts anti-Israel rhetoric, accusing Israel of controlling the United States and its politicians:







E @ElijahSchaffer · Sep 27
Our politicians serve **Israel**. They hate us



Imagine telling our founding fathers that in the future we'd be ruled by brown women who serve a foreign state



Katrina Pierson @KatrinaPierson · Sep 27

No. I have never seen so many vile and unhinged anti-Israel posts like the ones that have flooded my feed in the last couple of weeks.

I'm so pro-Israel that my friends in Jerusalem made my campaign T-shirt in Hebrew for me, and I wore it to the market in Tel Aviv. ...



E @ElijahSchaffer · Sep 26
Israel will kill more of us before they'll let their power over the US government & UN slip



Fox News @FoxNews · Sep 26

BREAKING: UN delegates from multiple nations walk out of Israeli Prime Minister Benjamin Netanyahu's General Assembly address



18. Defendant also has disdain for Dir. Patel, recently referring to him as a “traitor.”²

19. Defendant knowingly, or with reckless disregard for the truth, fabricated this accusation at the expense of Ms. Wilkins, generating outrage to drive up his viewership and engagement, thereby resulting in monetary gain and further notoriety. Minimally, Defendant acted negligently in doing so.

CAUSES OF ACTION

COUNT I

Defamation

20. Plaintiff incorporates by reference the above paragraphs as though set forth fully herein.

21. On September 15, 2025, Defendant defamed Ms. Wilkins, posting a carefully selected photograph of her in a fitted, sleeveless, red dress, arm-in-arm with Dir. Patel in a response to a post about Mossad female operatives.

22. In making this post, Defendant posted an actual, literally true, photograph of Ms. Wilkins and Dir. Patel in response to a lengthy post about Mossad female operatives.

23. The post reasonably implies that Ms. Wilkins herself is a Mossad agent, manipulating and in control of Dir. Patel.

² Elijah Schaffer (@ElijahSchaffer), X (May 8, 2025, at 10:19 A.M.), <https://x.com/ElijahSchaffer/status/1920483591600890276>.

24. This implication is categorically false and is so obviously damaging to her reputation that damages are presumed. Ms. Wilkins depends on her reputation as a patriotic American in her profession, both as a country music artist, and working for PragerU. The implication imputes the commission of various crimes, including espionage and treason.

25. As evidenced by Defendant's postings about Israel controlling the United States, as well as his disdain for Dir. Patel, Defendant intended and endorsed this inference. Defendant has malice toward Ms. Wilkins because of her relationship with Dir. Patel.

26. Defendant published his defamatory implication to over one million viewers, knowing that it was false, with reckless disregard for the truth, or at best, negligently. There is absolutely no reason—outside Defendant's desire to stir up controversy and generate income for himself—to accuse Ms. Wilkins, an American-born country singer, of being a foreign agent engaged in espionage. Defendant entirely fabricated the story to generate engagement revenue for himself and his company and to indulge in his obvious animus against Dir. Patel and against Ms. Wilkins for being in a relationship with Dir. Patel.

27. At no point has Defendant reached out to Ms. Wilkins. She has publicly stated prior to Defendant's statements that the allegations regarding her affiliation with Israel are false. Minimally, Defendant has acted negligently; however, his obvious animus, combined with the inherently ludicrous nature of his implication, are ample evidence that he acted with actual malice.

28. Considering the context of Defendant's various X posts about Israel, a reasonable person would understand that Defendant's statements are not mere hyperbole. And his viewers did, in fact, take him seriously, as evidenced by the replies to Defendant's post.

29. The defamatory implication has directly and proximately caused Ms. Wilkins to suffer significant damages, including damage to her reputation, humiliation, and embarrassment, the nature of which is ongoing and long-lasting. These damages were foreseeable and intended by Defendant.

30. Defendant published the defamatory statements knowingly, intentionally, willfully, wantonly, and maliciously, with intent to harm Ms. Wilkins, or in blatant disregard for the substantial likelihood of causing her harm, thereby entitling Ms. Wilkins to an award of punitive damages.

31. As a direct and proximate result of the misconduct of Defendant, Ms. Wilkins is entitled to compensatory, special, and punitive damages in the sum of \$5,000,000, or such greater amount as is determined by the jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Alexis Wilkins, respectfully requests this Court enter a judgment in her favor and grant relief against Defendant as follows:

- a. An award of compensatory, special, and punitive damages in excess of five million dollars (\$5,000,000.00); and
- b. Such other and further relief as the Court deems just and appropriate to protect Ms. Wilkins' rights and interests.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Dated: October 28, 2025

ALEXIS WILKINS
By Counsel

Respectfully submitted,

/s/ Jason C. Greaves

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