

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>SCOTTIE PIPPEN,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Case No. 11-8834</b>
	)	
<b>NBC UNIVERSAL MEDIA LLC, CBS</b>	)	
<b>INTERACTIVE INC., MINT SOFTWARE INC.</b>	)	<b>Honorable Sharon Coleman</b>
<b>wholly owned subsidiary of INTUIT INC., EVOLVE</b>	)	<b>Magistrate Judge Young Kim</b>
<b>MEDIA CORPORATION, INFOGROUP, INC.,</b>	)	
<b>INVESTING ANSWERS INC., ARIZONA STATE</b>	)	
<b>UNIVERSITY, UNIVERSITY OF TAMPA, INC.,</b>	)	
<b>ONE MONEY DESIGN, and SPORTS REPORT 360</b>	)	
	)	
<b>Defendants,</b>	)	

**AMENDED COMPLAINT**

Plaintiff, SCOTTIE PIPPEN (“Scottie”), by and through his attorneys, Arthur S. Gold of Gold & Coulson and the Spellmire Law Firm LLC, files this Amended Complaint and alleges as follows:

**INTRODUCTION**

1. It is a most foul libel indeed to be falsely accused of being bankrupt.
2. That is what happened to Scottie, and the malicious libel was disseminated across the nation by the media.

**THE PARTIES**

3. Scottie was born in Hamburg, Arkansas, and attended college at the University of Central Arkansas in Conway. At the start of his college career, Scottie was a walk-on for the now-former

NAIA school and depended on his stipend for being the team manager and his summer job as a welder to fund his education. Scottie then became a player and his 23.6 points per game average and near 60% field goal shooting earned the Central Arkansas senior Consensus NAIA all-American honors in 1987. He was then selected fifth overall in the 1987 NBA Draft by the Seattle SuperSonics and traded eventually to the Chicago Bulls for Olden Polynice.

Scottie became part of Chicago's young forward tandem with 6' 10" power forward Horace Grant, both coming off the bench to back up Brad Sellers and Charles Oakley during their respective rookie seasons. With Michael Jordan, a fellow Chicago Bull, as a motivational and instructional mentor, Scottie refined his skills while slowly developing many new ones over the course of his career. Michael and Scottie were known to frequently play one-on-one outside of team practices simply to hone each other's offensive and defensive skills. Scottie claimed the starting small forward position during the 1988 Playoffs, helping the Jordan-led Bulls to reach the conference semifinals for the first time in over a decade. Scottie emerged as one of the league's premier young forwards at the turn of the decade, recording then-career highs in points (16.5 points per game), rebounds (6.7 rebounds per game), and field goal shooting (48.9%) as well as being the NBA's number three leader in steals (211). These feats earned Scottie his debut NBA All-Star selection in 1990. Scottie continued to improve, helping the Bulls to the Conference Finals in 1989 as well as in 1990. However, the Bulls lost both Conference Finals to the Detroit Pistons.

In 1991, Scottie emerged as the Bulls' primary defensive stopper and a versatile scoring threat in Phil Jackson's Triangle offense. He helped lead the Bulls to their first three NBA championships (1991, 1992 and 1993).

Scottie earned 10 NBA All-Defensive Team nods, including eight on the first team. In 1992, he was named to the original Dream Team, which competed in the Olympics in Barcelona, Spain. With the U.S. winning the gold medal, both Scottie and Michael would become the first players to win both NBA championship and Olympic gold medal in the same year.

Michael retired before the 1993–94 season, and in his absence Scottie emerged from his shadow. That year, he earned All-Star Game MVP honors and led the Bulls in scoring, assists, and blocks, and leading the entire league in steals, averaging 22.0 points, 8.7 rebounds, 5.6 assists, 2.9 steals, 1.9 three-pointers, and 0.8 blocks per game, while shooting 49.1% from the field and a career-best 32% from the three-point line. For his efforts, Scottie earned the first of three straight All-NBA First Team nods and finished third in the MVP voting. The Bulls finished the season with 55 wins, only two fewer than the year before.

With the return of Michael and the addition of two-time champion Dennis Rodman, the Bulls posted the best regular-season record in NBA history (72—10) in 1995–96 en route to winning their fourth title against the Seattle SuperSonics. Later that year, Scottie became the first (and to this date, the only) person to win an NBA championship and an Olympic gold medal in the same year, twice, playing for Team USA at the Atlanta Olympics.

In the following season, Chicago finished a league-best 69–13 and again won the title, this time defeating the Utah Jazz. Amid speculation that the 1997–98 season would be the last in Chicago for Scottie, Michael, and Jackson, the Bulls followed by topping the Jazz again in the 1998 NBA Finals to cap their second three-peat. Scottie was selected as one of the NBA's Fifty Greatest Players when the league was celebrating its 50th season in 1997.

Scottie was a near-constant presence in the NBA post-season during his career, reaching the playoffs 16 straight years (11 with Chicago, one with Houston, four with Portland). He played in more playoff games than any NBA player except Robert Horry and Kareem Abdul-Jabbar. After retiring, he spent some time working as a basketball analyst for the Chicago Bulls. He was a special assistant coach for the Los Angeles Lakers. On December 25, 2005, Scottie debuted as studio analyst for the *NBA on ABC*. Before that, he was a part-time analyst for ESPN.

The Chicago Bulls retired Scottie's jersey number in a ceremony on December 9, 2005. The team played against the Los Angeles Lakers that night, and Scottie was reunited with Phil Jackson, Michael Jordan, Dennis Rodman, and Horace Grant during the ceremony. Scottie's jersey number 33 joined Michael's 23, Jerry Sloan's 4, and Bob Love's 10 as the only numbers retired by the Bulls. Scottie returned to the Bulls on July 15, 2010 as a team ambassador.

Scottie is remembered as one of the most versatile and agile players, and perhaps most notably as one of the greatest defenders, to ever play the game of basketball. Much like fellow Bull Michael Jordan, Scottie could provide tenacious on-the-ball perimeter defense, or tough interior defense, and he was particularly effective as a help defender. He was gifted with extraordinary athleticism, even compared with other professional athletes, and skills in areas that bode well for basketball.

Throughout his life, Scottie worked zealously to create and maintain a reputation in the community as a person of impeccable character, who has worked tirelessly to succeed as a student, teammate, businessperson, community member, husband, father, and mentor to children and youth.

4 Defendant NBCUniversal Media LLC is a limited liability company organized under the laws of the State of Delaware and has its principal place of business in New York.

NBCUniversal Media, LLC owns CNBC. The sole member of NBCUniversal Media, LLC is NBCUniversal, LLC, which is a limited liability company organized under the laws of the State of Delaware and has its principal place of business in New York. Fifty-one percent of NBCUniversal, LLC is indirectly owned by Comcast Corporation, which is incorporated in, and has its principal place of business in, Pennsylvania. All of the entities in the corporate structure between NBCUniversal, LLC and Comcast Corporation are corporations incorporated in Delaware or Pennsylvania, or limited liability companies that are organized under the laws of the State of Delaware, and all of these corporations and limited liability companies have their principal places of business in states other than Illinois. Forty-nine percent of NBCUniversal, LLC is owned by Navy Holdings, Inc., which is incorporated in Delaware and has its principal place of business in Connecticut. Hereinafter, these entities shall be collectively referred to as “CNBC”.

5. Defendant INFORGROUP, INC., has its principal place of business in Papillion, Nebraska, is a citizen of Nebraska and operates a website known as “Creditnet”.

6. CBS Interactive Inc. operates CBSSportsline and, on information and belief, is a wholly owned subsidiary of CBS Corporation. It is a citizen of the State of Delaware. CBSSportsline is a registered trademark of CBS Broadcasting Inc. Hereinafter these entities shall be referred to as “CBSSportsline” a year-round leader in television sports, broadcasts a portfolio of events on the CBS Television Network, including the NFL’s American Football Conference; THE NFL TODAY, college basketball, including the NCAA Division I Men’s Basketball Championship;

golf, including The Masters and PGA Championship; college football, including the SEC ON CBS; the U.S. Open Tennis Championships; CBS SPORTS SPECTACULAR, including track & field, auto racing and gymnastics. In addition, the division directs the CBS Sports Network, a 24-hour national cable network, which produces “Inside the NFL” for Showtime and partners with CBS Sports.com in creating a recognized leader among sports Internet destinations.

7. Mint Software Inc. is a wholly owned subsidiary of Intuit, Inc., which is a citizen of the State of Delaware. Founded in 2006, it provides a Web-based solution for online financial management. It offers money management, debt management, expense tracking, investment management, budget management, mutual fund, IRA management, and financial planning services. The company also provides suggestions based on user’s spending patterns and automatic categorization of purchases. Mint Software, Inc. was founded in 2006. As of November 2, 2009, Mint Software, Inc. operates as a subsidiary of Intuit Inc.

8. EVOLVE MEDIA CORP. is a Delaware corporation, owns HoopsVibe.com, and is a citizen of the State of Delaware. It is an online forum site that disseminates all basketball-related news to basketball fans.

9. INVESTING ANSWERS INC. is a citizen in the State of Texas and at one time was a Maryland LLC but was dissolved yet still operates under the name “INVESTING ANSWERS”. Industry veterans Lou Betancourt and Paul Tracy founded Investing Answers in 2001. Investing Answers is a financial research and publishing company with offices in Austin, Texas and Gaithersburg, Maryland. It is the nation's premier source for investment research, guidance, and related information.

10. Defendant Arizona State University is a citizen of the State of Arizona and was founded by a group of Valley cattlemen and farmers, establishing the Agricultural Advisory Council in 1947.

11. THE UNIVERSITY OF TAMPA, INC. is a citizen of the State of Florida and a private, co-educational university in downtown Tampa, Florida. It owns and operates a student-run newspaper by the name of Minaret Online, which claims to be the University of Tampa's News Source since 1933.

### **JURISDICTION AND VENUE**

12. Each of the above non-Illinois citizen defendants committed tortious acts within Cook County, Illinois by publishing and disseminating and causing to be published and disseminated the defamations described in this Amended Complaint, in Cook County, Illinois, and elsewhere across the country.

13. Jurisdiction in this Court is proper under 28 USC § 1332 as complete diversity between Plaintiff and Defendants exists in that Plaintiff is a citizen of the State of Illinois and all Defendants are citizens of the States outlined in paragraphs 4-11 above: all of which are different than the state of Plaintiff.

14. The amount in controversy exceeds \$75,000 exclusive of interest and costs.

15. Venue is properly laid in this District as a majority of the acts or omissions complained of have occurred in this District.

### **THE LIBELS**

16. On April 26, 2011, the CNBC's website published an article "15 Athletes Gone Bankrupt" listing Scottie Pippen in which the following statement was made:

“Scottie Pippen is best remembered for his tenure with the Chicago Bulls. The 2010 Basketball Hall of Fame inductee was there when they won six NBA Championships, and he was there during the 1995-1996 season in which they won 72 games. He is also the only person to win both an NBA championship and an Olympic gold medal in the same year, and he is one of only four players from the Chicago Bulls to have his jersey retired. Unfortunately, Pippen’s successes on the court couldn’t stop him from losing career earnings worth \$120 million, including over \$4 million for a corporate jet that was grounded just months after he bought it. . .”

(A copy of that story is attached as Exhibit 1.)

17. On May 31, 2011, Defendant Infogroup Inc. on its website “Creditnet” published a story:

“Bankrupt Athletes: How They Got There”. Scottie Pippen is listed as one of the Athletes, in which the following quote was made:

### **“Scottie Pippen**

Famous for his leading role with Michael Jordan and the Chicago Bulls, Pippen earned nearly \$120 million during his successful career. Rather, he suffered the same fate of other athletes like Raghib “Rocket” Ismael, Rollie Fingers, Johnny Unitas, and Sheryl Swoopes.”

(A copy of that story is attached as Exhibit 2.)

18. On January 26, 2011 CBSSportsline aired a story “Money a problem for a lot of former players” with a huge picture of Scottie under the title: in which the following quote was made:

“A big, eye-catching number was tossed around a few years ago in regards to former NBA players and *bankruptcy*. According to the Toronto Star, around 60 percent of NBA players are broke after five years of retirement.

There's been a little debate as to how accurate that number really is, but the truth is this: A lot of former NBA players don't manage their millions well and end up filing for bankruptcy. Not all do it just from spending on cars, houses, women and other material things though. Most just lose it through poor money management. Bad investments, bad business choices and bad people helping them.” (Emphasis added.)

(A copy of that story is attached as Exhibit 3.)



19. On February 1, 2011, Sportsandentertainmentlawblog.com, created by Arizona State University, tagged Scottie's name with bankruptcy. (A copy of that story is attached as Exhibit 4.)

20. On October 28, 2011, on the website mint.com/blog/investing, Mint Software Inc. published: "From Stoke to Broke Why Are Sports Stars Going Bankrupt?" was an article in which the following information was cited:

"Scottie Pippen, Basketball  
Year bankruptcy filed: 2003  
Risky investments, Buying a corporate jet"

(A copy of that story is attached as Exhibit 5.)

21. On April 27, 2011 Investinganswers.com posted a story "20 Star Athletes Who Went From Millions to Bankruptcy Court", "Scottie Pippen: Estimated Lost - \$120 Million" in which the following quote was made:

"Scottie Pippen was instrumental in six NBA Championships with the Chicago Bulls throughout the 1990s. He was the "Robin" to Chicago's "Batman," Michael Jordan. Pippen is considered one of the best NBA small forwards of all time, a seven-time NBA All-Star and was inducted into the Basketball Hall of Fame on August 13, 2010. Unfortunately, Pippen not as successful with investing his money as he was on the basketball court."

(A copy of that story is attached as Exhibit 6.)

22. On October 26, 2011, HoopsVibe.com posted a story "If Dr. J is Broke, What Chance Do ANY of Us Have??" listing Scottie Pippen in which the following quote was made:

"Scottie Pippen was another big name who lost big. After making \$120 million dollars during his playing career he famously filed bankruptcy due in large part to a failed investment in a corporate jet. He also got screwed over by his former law firm, losing \$27 million dollars in the process."

(A copy of that story is attached as Exhibit 7.)

23. On November 9, 2011, Minaret Online posted a story “How to Be an Athlete and Not Go Broke – For Dummies” listing Scottie Pippen in which the following quote was made:

“Scottie Pippen has made approximately \$250 million ... These world championship athletes have one analogous trait in common; they have all reached the point of broke after their career has ended.”

(A copy of that story is attached as Exhibit 8.)

24. All of Defendants’ above statements are false. Scottie *never* filed bankruptcy and indeed has a substantial net worth, which has not been less than approximately \$40,000,000 in the last ten years.

#### **SCOTTIE’S PUBLIC SERVICE**

25. Scottie was honored in Miami, Florida at a ceremony by The Buoniconti Fund to Cure Paralysis. That organization does work with Make A Wish and when asked why he was there, the following interview took place:

**Scottie: I’m being honored here tonight from a great foundation, the Buoniconti Foundation for paralysis. It’s a great foundation, it’s great to be honored among some of the greatest athletes in their various sports and it’s just great for me to be here and be a part of something and knowing that it’s for a great cause.**

CGG: Has paralysis affected anyone you know?

**SP: Yeah, it actually affected my brother when I was about four years old. I had a brother who got paralyzed in a gym class and he’s still paralyzed to this day; he’s 53 years old. It definitely has hit home to me and I think that this is a great cause and hopefully in the future, no one will have to suffer the way I have seen my brother suffer the last 40 years.**

CGG: What do you hope will be the result of tonight?

**SP: Well I hope they continue to raise money and continue to be able to fund the research and what they need to find a cure.**

CGG: What other causes are you passionate about?

**SP: I’m passionate about diabetics for one. I have a mother who’s diabetic. I have very deep feelings for anything revolving [sic] kids, or child abuse,**

**things of that nature. I definitely put this among the top because of the fact that I lived through it at a younger age.**

At Victor Herbert elementary School in Chicago the following occurred:

**Chicago Bulls** legend [Scottie Pippen](#) and other Bulls members teamed up with **Kia Motors** to organize a rally to deliver much-needed school supplies to students at **Victor Herbert Elementary School in Chicago**. Pippen was joined by Bulls personalities to include mascot **Benny the Bull** and team members **Randy Brown, Adrian Griffin, Bob Love, Sidney Green, and Chuck Swirsky**. The Bulls were on hand to personally deliver the donated supplies, including spiral notebooks, pencils, pens, pocket folders, crayons, and backpacks – all in Kia vehicles – to the kids at the school.



Fans were also encouraged to make donations to the drive online, which resulted in raising **\$11,740** that went towards the purchase of **35 brand new laptops** for the students.

Moreover, Scottie has signed numerous materials for donations to charity events and has been heavily involved in the CharitaBulls (charity arm of the Bulls). He appeared at the opening of the Kroc Center on the southside of Chicago where the Bulls donated \$1million. He also appeared at the Champions for Children event in 2011 benefitting the Children's Memorial Hospital.

On November 9, 2010 he publicized the McPherson EnergizaBulls Fitness Learning Center Opening. The student, parents, faculty and staff of McPherson Elementary (4728 N. Wolcott) welcomed Bulls legend Scottie Pippen. The state-of-the-art fitness center is part of an ongoing program by the Chicago Bulls to help teach students the importance of a healthy and active lifestyle. The EnergizaBulls program is supported by a \$1.475 million grant from the U.S. Department of Education, awarded to the Chicago Bulls in an effort to help curb the rising obesity rates among young children. The McPherson fitness center is the tenth facility built by the Chicago Bulls organization at Chicago area public schools, with plans for a total of 15 by the end of the 2011-12 school year.

On October 21, 2010. Scottie joined the Bulls as they officially opened the 2010-11 basketball season with the team's annual Tip-Off Luncheon at the Hilton Chicago. Long-time guests enjoyed lunch and took advantage of the opportunity to purchase pieces of Bulls' history in a silent auction. All proceeds from the event and the silent auction benefitted CharitaBulls.

On October 7, 2010, Scottie attended the Ray and Joan Kroc Corps Community Center Groundbreaking. CharitaBulls, donated \$1 million to the Salvation Army Chicago Metropolitan Division to help build the Ray and Joan Kroc Corps Community Center in the West Pullman neighborhood. The Kroc Center is the largest single investment ever made by a social service organization in the City of Chicago.

26. Paragraph 29 demonstrates only a few examples of Scottie's public commitment.

27. But, saliently, the Defendants' sloppy conduct, in light of the previous description of Scottie, was especially egregious in view of the fact that a mere click of the mouse for bankruptcies in Scottie's home State would have illustrated he *never* filed a bankruptcy.

28. Scottie has had to vigorously deny and refute the above defamatory statements to business associates, colleagues, family and friends despite his outstanding charitable involvement and appearances.

29. As a proximate result of the above-delineated false defamatory statements made by Defendants, Scottie's reputation has been permanently damaged and he has been forever deprived of the impeccable personal and professional reputation which he worked for years to create and maintain, and which he deserves.

30. As a proximate result of the above delineated false defamatory statements made by Defendants, Plaintiff has suffered emotional distress and mental pain and suffering, and will continue to do so in the future.

31. As a proximate result of the above delineated false defamatory statements made by Defendants, Plaintiff has suffered substantial monetary damages because since these false defamatory statements have been circulated worldwide, Scottie's offers for personal appearances and endorsements have dwindled to a fraction of what they had been previously: all of which will be established at the trial of this matter.

32. Scottie is entitled to punitive damages in order to punish and deter Defendants from such reckless conduct.

#### **COUNT I - NEGLIGENCE**

33. Paragraphs 1 through 32 are realleged and incorporated herein.

34. Each Defendant owed a duty of care to Scottie, who never filed bankruptcy, including a duty to properly investigate the truth of the matter.

35. Each Defendant failed to act as a reasonably careful person would act under the same or similar circumstances.

36. As a proximate cause, Scottie was injured as alleged.

WHEREFORE, Scottie prays this Court to enter judgment in his favor and against each of the Defendants, as follows:

- a. Judgment in such amount as the Court may deem just and appropriate to compensate Scottie for all actual damages that Plaintiff's reputation and privacy suffered.
- b. Court costs.
- c. Such further relief as this Court may deem necessary and proper.

#### **COUNT II - FALSE LIGHT**

37. Paragraphs 1 through 36 are realleged and incorporated herein.

38. AS ALLEGED ABOVE, EACH Defendant's actions placed Scottie in a false light before the public.

39. The false light, as alleged above, was of such a nature as to be highly offensive to a reasonable person.

40. As a result, Scottie has been damaged.

WHEREFORE, Scottie prays that this court enter judgment in his favor and against each of the Defendants, as follows:

- a. Judgment in such amount as the Court may deem just and appropriate to compensate Scottie for all actual damages that he may demonstrate to have suffered.

- b. Judgment in an amount equivalent to that sum fixed by the Court to punish each Defendant for its wrongful conduct, but in no event less than \$1,000,000.
- c. Court costs.
- d. Such further relief as this Court may deem necessary and proper.

**COUNT III - DEFAMATION PER SE**

- 41. Paragraphs 1 through 40 are realleged and incorporated herein.
- 42. Defendants' unprivileged defamations, as alleged above, were published with actual malice and/or utter disregard for Scottie's rights and interest.
- 43. Defendants' false statements about Scottie constitute defamation per se.

WHEREFORE, Scottie prays this court enter judgment in favor of Scottie and against each of the Defendants, as follows:

- a. Judgment in such amount as the Court may deem just and appropriate to compensate Scottie for all presumed damages that Scottie has suffered as a result of Defendants' wrongful and unprivileged defamations.
- b. Judgment in such amount as the Court may deem just and appropriate to compensate Scottie for all actual damages that he may be demonstrated to have suffered as a result of the Defendants' wrongful and unprivileged defamations.
- c. Judgment in an amount equivalent to that sum fixed by the Court to punish each Defendant for its malicious and unprivileged defamation, but in no event less than \$1,000,000.
- d. Court costs.
- e. Such further relief as this Court may deem necessary and proper.

Respectfully submitted,

s/Arthur S. Gold  
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