

**DEMAND BY CLARRE LOCKE UPON AXEL SPRINGER SE ON BEHALF OF
NERI OXMAN**

**BUSINESS INSIDER’S FALSE AND DEFAMATORY REPORTING
REGARDING DR. NERI OXMAN**

**NERI OXMAN, Demandant (*Aggrieved
Party*)**

v.

**AXEL SPRINGER SE, Respondent
(*Alleged Libeler*)**

AUTO GENERATED SUMMARY OF DEMAND LETTER

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Approximate Efficiencies Produced:

Original Complaint: Approx. 22,000 words (77 text pages)

Synopsis ~500 words

Narrative Summary: ~6,650 words

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SIGNIFICANCE

The central legal and ethical questions in this dispute revolve around defamation, the responsibility of the media, and the complex interplay between public figures' private lives and their professional impacts. The matter touches on issues of academic integrity, journalistic ethics, and the power dynamics between media entities and the individuals they report on. Furthermore, it highlights the potential for personal and professional harm stemming from inaccurate or malicious reporting, underscoring the need for stringent adherence to journalistic standards and accountability mechanisms within the press.

SYNOPSIS

The detailed allegations made against Business Insider or Axel Springer, as outlined in the February 23, 2024 demand letter from attorney Elizabeth M. Locke to Axel Springer Chairman Mathias Döpfner and General Counsel Konrad Wartenberg on behalf of her client Dr. Neri Oxman, are as follows:

1. False and Defamatory Reporting: The articles published by Business Insider falsely branded Dr. Oxman as an intellectual thief and a fraud, accusing her of intentionally plagiarizing in her doctoral dissertation and other works, which is claimed to be part of an orchestrated retaliation against her husband, Bill Ackman, for his public criticisms.
2. Malicious Intent and Ethical Journalism Violations: The reporting is said to be full of untrue and reckless claims made with actual malice, with allegations that Business Insider's journalists acted unethically by lying, failing to provide fair time for response, and misrepresenting facts with the aim to harm Dr. Oxman.
3. Defamation Per Se: Accusations of plagiarism, especially intentional plagiarism, are considered defamation per se due to the seriousness of the offence in academic circles and professional damage it can cause.
4. Misconstruing the Nature of Citation Errors: Business Insider is accused of misconstruing non-substantive citation errors as intentional plagiarism, despite Dr. Oxman's statements recognizing only minor citation mistakes.
5. Omission of MIT Policies: The articles omitted critical details about MIT's academic standards and plagiarism policies that recognize the distinction between intentional and accidental plagiarism, hence misleading readers.

6. Mischaracterization of Admission: Business Insider allegedly misrepresented Dr. Oxman's admission of citation errors as an admission of plagiarism in subsequent articles, intentionally altering the meaning to influence readers' perception negatively.
7. Selective and Deceptive Reporting: Business Insider is accused of selectively citing parts of Dr. Oxman's work to falsely suggest plagiarism, including strategically rearranging text and omitting contexts and citations.
8. Bias and Agenda-driven Reporting: The journalists responsible for the articles are said to have a history of biased reporting and anti-Zionist views, suggesting the articles were part of a campaign to smear Dr. Oxman due to her husband's stance against antisemitism.
9. Failure to Allow for Response: Business Insider is accused of failing to allow sufficient time for Dr. Oxman to respond to new allegations of plagiarism, emphasizing the rushed nature of the follow-up article's publication.
10. False Accusation of Quid-Pro-Quo With Jeffrey Epstein: Business Insider falsely accused Dr. Oxman of engaging in a quid-pro-quo relationship with convicted sex offender Jeffrey Epstein, intentionally mentioning this as part of a supposed brewing scandal.
11. Invasion of Privacy: Business Insider allegedly doxed Dr. Oxman by publishing her home address, which is both irrelevant to the article and poses security risks.
12. Refusal to Retract Despite Rebuttal: Business Insider and Axel Springer are claimed to have repeatedly refused to retract the articles despite clear disputes of the facts from Dr. Oxman and Ackman, again suggesting malice.
13. Greed as a Motivating Factor: The pursuit of clicks and ad revenue is alleged as a motivating factor for Business Insider's sensational and defamatory reporting.
14. Demand for Corrective Action: The letter demands that Business Insider and Axel Springer retract the false claims, issue public apologies, and set up a fund for victims of such reporting practices.

The letter outlines a comprehensive and itemized critique of the journalistic integrity, ethical standards, and factual inaccuracies within Business Insider's reporting, and it points out specific instances where these have been compromised. It sets forth potential legal repercussions should the issues not be addressed satisfactorily by Business Insider and Axel Springer.

NARRATIVE SUMMARY**DEMAND BY CLARRE LOCKE UPON AXEL SPRINGER SE ON BEHALF OF NERI OXMAN****RE: Business Insider's False and Defamatory Reporting Regarding Dr. Neri Oxman**

Dear Drs. Döpfner and Wartenberg:

This letter is written on behalf of my client Dr. Neri Oxman, former MIT faculty member and current CEO of OXMAN. It addresses false, defamatory allegations published by Business Insider, accusing Dr. Oxman of plagiarism in her doctoral dissertation and other works. These accusations appear to stem from a revenge plot against her husband, Bill Ackman, in retaliation for his criticisms of university presidents in the wake of antisemitic incidents.

The orchestrated attack is by Katherine Long, John Cook, and Henry Blodget who each have a history of anti-Zionist and antisemitic sentiments. They distorted inconsequential citation errors into allegations of "theft" and "fraud" against Dr. Oxman, violating ethical journalism through dishonest practices and malicious intent.

Plagiarism accusations are a defamatory act of seriously damaging someone's professional stature by implying theft or deception: however, such intent must be proved, and unintentional citation errors or honest errors are exempt from the charge. MIT, where Dr. Oxman earned her doctorate, specifically states that plagiarism "does not include honest error" and Business Insider blatantly disregarded this definition.

Business Insider knowingly published a false narrative by omitting key aspects of MIT's policies and procedures on plagiarism in its articles, particularly that plagiarism must be "intentional, knowing, or reckless" to be considered academic misconduct. Neither did they acknowledge that Dr. Oxman's so-called plagiarism might be MIT's "common knowledge," or "accidental plagiarism."

After the publication of Business Insider's first article, Dr. Oxman admitted to minor citation errors and apologized for them but did not admit to plagiarism. Business Insider published a follow-up article with a deceptive headline, mischaracterizing Dr. Oxman's statement, and falsely suggesting she admitted to academic thievery.

This is a demand for immediate retractions and corrections, highlighting the requirement for immediate remediation to prevent litigation. This is supported by indisputable facts and a timeline of events.

I. Business Insider Falsely Accused Dr. Oxman Of Intellectual Theft And Fraud By Claiming That Dr. Oxman “Stole,” “Lifted,” “Recycled,” And “Cribbed” Passages, And “Passed Off Writing From Other Sources As Her Own.

Journalists should take care not to misrepresent or oversimplify a detailed story to ensure accuracy according to NPR's Ethics Handbook. However, Business Insider's reports on allegations of plagiarism in Dr. Oxman's dissertation did not adhere to these principles. Instead, they misleadingly interpreted information within MIT's "common knowledge" guidelines and minor errors as intentional plagiarism, contravening definitions provided by Merriam Webster and Miguel Roig.

Plagiarism requires intent to steal or defraud as confirmed by Business Insider, hence unintentional citation mistakes and honest errors are not considered plagiarism. Moreover, MIT's academic standards specify that unintentional plagiarism is not deemed as academic misconduct. Inclusion of unattributed content that qualifies as common knowledge — concepts that although complex for general public are understood by educated audience — is not plagiarism according to MIT's academic standards. This applies to paraphrasing and summarizing widely known information in academic circles.

Business Insider's reports falsely attributed the citation issues in Dr. Oxman's dissertation to intentional plagiarism. Despite citation to MIT's Academic Integrity Handbook and academic-integrity code, it published eight articles accusing Dr. Oxman of intentional plagiarism. Omissions of the recognition of "common knowledge", "honest error", "inadvertence", and "accidental plagiarism" in their articles demonstrates a deliberate intent to harm Ackman and Dr. Oxman's reputation.

Business Insider persistently made erroneous claims that Dr. Oxman and Ackman neither disputed the facts nor the allegations which contrasts with Ackman's public and private statements citing inaccuracies in the articles. For instance, Business Insider's January 5 article concluded that Dr. Oxman plagiarized from Wikipedia, other scholars and technical documents without sufficient evidence.

Furthermore, Business Insider did not substantiate its assessment of Dr. Oxman's supposed intent on avoiding Wikipedia citation. Its claims were deceitful and unsupported, since Dr. Oxman had cited Wikipedia numerous times in her dissertation when required. The news platform's baseless attribution of malintent to Dr. Oxman displayed recklessness and disregard for truth.

a. Business Insider Falsely Accused Dr. Oxman Of Intellectual Theft And Fraud—Both Expressly And By Implication—By Intentionally Omitting That MIT Does Not Require Citation For Information That Is Common Knowledge.

MIT's regulations, applicable during Dr. Oxman's dissertation creation and currently, clarify that citation is not necessary for "common knowledge" content, defined as "knowledge shared by members of a certain field". MIT stresses that facts, such as the necessary condition for diffraction of radiation from a crystalline solid is dictated by Bragg's law, do not require citation, despite the general public being unfamiliar with the concept.

Business Insider's accusations of plagiarism against Dr. Oxman were primarily concerning items, like definitions and descriptions, that were considered common knowledge within her field and therefore, requiring no citation under MIT's guidelines. This included commonly recognized concepts like Computer-Aided Design, and definitions from sources such as Wikipedia and technical manuals.

Business Insider also took issue with references that Dr. Oxman correctly cited. For instance, it pointed out a complaint about a footnote citation for the definition of "pain". However, the footnote clearly cited the original source of the definition, making it evident that the definition was not off the record.

Furthermore, Business Insider had objections with various terms used by Dr. Oxman, considering them as plagiarized content. The list included Wikipedia definitions for terms like "tessellation", "principle of minimum energy", "weaving", "Non-Uniform Rational B-Splines", "constitutive equations", "computer graphics", "raster graphics", "translational symmetry", "reflective symmetry", "heat flux", "tensor", and "manifolds." It should be noted that nearly all these alleged plagiarism instances were in the background section or footnotes of the dissertation, not a part of her primary work or arguments.

Interestingly, in its own article, Business Insider quoted a math professor who recognized that the information was rudimentary common knowledge, stating, "[A]nyone who knows even the rudiments of algebraic topology could come up with their own sentence."

b. Business Insider Falsely Accused Dr. Oxman Of Intellectual Theft And Fraud—Both Expressly And By Implication—By Intentionally Omitting MIT's Own Policies Acknowledging Accidental And Inadvertent Plagiarism.

Plagiarism ranges from intentional theft of others' ideas to accidental non-compliance with citation standards. As Business Insider's Founder and Chairman Henry Blodget admitted, he was aware of this spectrum. Furthermore, MIT's academic integrity policies underscore that

unintentional plagiarism is not an academic misconduct. These policies specify that plagiarism includes fabrication and falsification while excluding honest mistakes. They also allow for instances where uncited usage of academic writing may result from inadvertence or poor note-taking, not necessarily dishonesty. Still, Business Insider wrongfully depicted Dr. Oxman's dissertation as intentionally plagiarized.

Despite acknowledging the distinction between inadvertent and intentional plagiarism, Business Insider selectively highlighted MIT's Academic Integrity Handbook sections that bolstered the unfounded concept of Dr. Oxman's intentional plagiarism. MIT's policies that counter this narrative were intentionally left out. These omitted policies include acknowledgement of unintentional plagiarism due to cultural misunderstanding, poor paraphrasing, challenging concepts, and poor note-taking. The Handbook also stipulates academic misconduct plague to be intentional, knowing, or reckless.

Furthermore, Business Insider overlooked the MIT rule requiring a predominant evidence of intentionality or recklessness to accuse someone of plagiarism, giving an unjust impression of Dr. Oxman's intellectual theft. This selective reference to MIT's policies substantiates Business Insider's malice towards Dr. Oxman and Ackman. Their narrative was a deliberate contradiction of sources, which is evidence of actual malice. Such partial quoting and disregard for contradictory evidence are legally significant.

c. Business Insider Falsely Accused Dr. Oxman Of Intellectual Theft And Fraud By Falsely And Maliciously Claiming That Dr. Oxman Lifted A Nearly 50-Word Passage From Claus Mattheck Without Attribution When She Did Not.

Business Insider strategically manipulated paragraphs from Dr. Oxman's dissertation, implying she plagiarized Claus Mattheck's book. By reordering and combining excerpts, the publication insinuated she included a larger excerpt than actually present. Business Insider manufactured this impression by placing ellipses between two short excerpts from different pages of her dissertation and omitting that she cited Mattheck, misleadingly suggesting lengthy copying. This manipulation can be seen in their January 4th article. Such purposeful alteration of the text, resulting in a significant change in meaning, showcases the presence of falsity and knowledge of it, qualifying as actual malice per *Masson v. New Yorker Mag., Inc.*, 501 U.S. 496, 517 (1991). When a user referred to as X highlighted the false portrayal of Dr. Oxman's work, Business Insider, rather than acknowledging their error as journalistic standards mandate, inconspicuously corrected the article. This act further reinforces the deliberate and malicious misrepresentation of Dr. Oxman's work by Business Insider. Even in this corrected version, Business Insider highlighted a longer passage than necessary, leaving Dr. Oxman's citation unhighlighted, indicating a persistent intent to harm her. Upon discovering this, Business Insider sought to suppress this evidence and silence its critic by blocking the X user.

d. Business Insider Falsely Accused Dr. Oxman Of Intellectual Theft And Fraud By Claiming In Its January 4 Article That Her Dissertation Was “Marred By Plagiarism,” While Intentionally Omitting The Fact That Dr. Oxman

Business Insider's article from January 4 incorrectly asserted that Dr. Neri Oxman's dissertation was "marred by plagiarism." Business Insider only identified five trivial citation errors in Oxman's doctoral dissertation, notably ignoring her repeated attribution to Claus Mattheck, whom Business Insider accused her of plagiarizing. In contradiction to Business Insider's assertions, Oxman properly accredited the authors, albeit with some missing quotation marks and omitted one citation to Mattheck's book, which was included in her bibliography. Business Insider deliberately overlooked that Oxman's dissertation referenced Mattheck's work nine times and even lauded him for his significant contributions to Biomimetics. These facts clearly illustrate Oxman's intent to credit Mattheck, dispelling accusations of intellectual theft. Despite the sparse citation errors, characterizing her expansive 330-page dissertation as spoiled or ruined by plagiarism is an extreme misrepresentation.

e. Business Insider Falsely Accused Dr. Oxman Of Intellectual Theft And Fraud By Intentionally Omitting The Fact That Dr. Oxman Did, In Fact, Cite Wikipedia In Her Dissertation Although MIT’s Standards At The Time Did Not Require It.

Business insider's report on January 5, 2024 accused academic celebrity, Dr. Neri Oxman, of plagiarizing content from wikipedia and other sources without crediting them in her dissertation which was written in 2009 and 2010. This accusation is based on 15 instances where the sentences and paragraphs allegedly stolen from Wikipedia were identified. It's worth noting, however, that during the time Oxford wrote her dissertation, MIT's Academic Integrity Handbook did not require or even address citing of Wikipedia as it was a nascent resource with no single author to credit. It was only several years later that MIT added a prohibition on citing Wikipedia for academic work. Hence, at the time of writing her dissertation, Dr. Oxman was not subject to such prohibitions. Despite being aware of this, Business insider went on to present information which painted Dr. Oxman in a negative light and accused her of literary theft. They even cited MIT's Academic Integrity Handbook, trying to imply that Dr. Oxman had transgressed its rules. This was based on their citation from the manual which stated that "authors must either ‘use quotation marks around the words and cite the source,’ or ‘paraphrase or summarize acceptably and cite the source’”. It also pointed out that the handbook had contained the same statement since 2007.

Further, check with Wayback Machine revealed that guidance concerning Wikipedia was introduced to MIT's Integrity Handbook only in April 2013, while Dr. Oxman wrote her dissertation in 2009 and 2010. Business Insider insisted that teachers regularly instruct students

not to cite Wikipedia, creating an implication that such policies existed at the time of the writing of Dr. Oxman's dissertation. Allegedly, Oxman never recognized Wikipedia as the source of her information. Contrarily, Oxman duly made citations directly to Wikipedia when it was not common knowledge. Oxman's proper use of Wikipedia undermines the allegation that she intentionally tried to hide her reliance on the platform due to its unreliability.

Adding to this, the January 5 article, however, stated it was unsurprising that Oxman wouldn't credit Wikipedia because "While Wikipedia is generally accurate, anyone can edit it, so teachers regularly tell their students that they should not cite the website as an authority.". Dr. Oxman also used images and photographs from Wikipedia when a clear credited source was available, further debunking the claims of plagiarism and intentional hiding of the usage of Wikipedia.

II. Business Insider Improperly Reported That It “Found” That Dr. Oxman

Business Insider unjustly leveled accusations of intentional plagiarism against Dr. Oxman, without conducting the necessary rigorous inquiry to ascertain a pattern of plagiarism in her work. Accusations of plagiarism equate to defamatory per se, considering the gravity of such an allegation in academia, and can lead to severe consequences including expulsion for the guilty party. A comprehensive and impartial investigation into such allegations should precede any finding or claim. MIT, in fact, maintains clear protocols to deal with potential academic misconduct.

According to these protocols, an initial assessment is conducted by the Vice President for Research to determine the scope of these allegations. Thereafter follow a two-stage review process, beginning with an information gathering inquiry to assess whether the allegations warrant further scrutiny. Then, the accused is given the opportunity to review and respond to the draft inquiry report before it's finalized. The final report is also reviewed by the Provost, who decides whether to proceed with an investigation.

Subsequently, an investigation is carried out by an impartial investigator or investigation committee under the oversight of the Vice President for Research. Following this, the Vice President for Research reviews the final investigation report and submits it, with recommendations, to the Provost for a final decision. For such an investigation to make a finding of misconduct, it requires proof of intentional, knowing, or reckless action.

Business Insider, regardless, impeached these rigorous and thorough procedures for investigating allegations of plagiarism. The publication failed to verify Dr. Oxman's intent in its accusations, rendering its claim baseless. Its unproven allegation served only to bolster a false narrative against Dr. Oxman and portray her as guilty of intellectual theft and fraud.

III. In A Carefully Orchestrated Series Of Outreaches To, And Articles About, Ackman And Dr. Oxman, Business Insider Falsely Accused Dr. Oxman Of Admitting To Intellectual Theft And Fraud By Improperly Characterizing Dr. Oxman's Admission Of Five Inconsequential Clerical Errors As Intentional Plagiarism.

Business Insider started a smear campaign against Dr. Oxman in January 2024 as part of their retaliatory efforts against her husband, Bill Ackman, following his criticism of the presidents of Harvard University, the University of Pennsylvania, and MIT. Ackman's criticism stemmed from a perceived lack of leadership in addressing the rise of antisemitism on these campuses. University presidents' testimonies before Congress led to Ackman's public demand for their resignation, which resulted in further criticism from Business Insider.

From early December 2023 to early January 2024, Ackman became the subject of more than a dozen articles portraying him as a racist bully, a strategy to affect him via his wife and family. Business Insider published eight articles blatantly accusing Dr. Oxman of intellectual theft and academic misconduct. They also falsely stated that Dr. Oxman and Ackman did not dispute the accuracy of their reporting, increasing the damage to Dr. Oxman's reputation and creating an untrue narrative around her alleged plagiarism.

The campaign escalated on January 3, 2024, when Business Insider reporter Katherine Long emailed Ackman and his investment firm's general media inquiry address, accusing Dr. Oxman of numerous plagiarism instances in her doctoral dissertation. Long failed to disclose that Business Insider would report additional instances of alleged plagiarism. A series of exchanges between Long and Fran McGill, head of communications for Ackman's investment firm, followed, setting the stage for further misrepresentation.

Dr. Oxman responded by acknowledging four paragraphs of her 330-page dissertation that lacked proper quotation marks and one uncited paraphrased sentence, but did not admit to plagiarism. Business Insider then published an article falsely claiming that Dr. Oxman admitted to plagiarizing in her doctoral dissertation. Through misleading reporting and mischaracterization of Dr. Oxman's statement, Business Insider shaped the reader's perception that her citation errors were intentional and more severe than they were. Other publications amplified these claims, falsely convicting Dr. Oxman of intentional plagiarism in the court of public opinion.

IV. Business Insider Repeatedly Republished Its False Claim That Dr. Oxman Admitted To Intellectual Theft And Fraud, And Then It Hid From Its Viewers Her Actual Statement Admitting To Five Inconsequential Clerical Errors.

Business Insider published the incorrect assertion that Dr. Oxman acknowledged committing plagiarism multiple times. On January 5, 2024, an article stated that Dr. Oxman “apologized for multiple instances of plagiarism in her 2010 doctoral dissertation” (L. Lee & M. Berg, How plagiarism by Claudine Gay, Harvard’s former president, compares to that of Neri Oxman, an academic and Bill Ackman’s wife, Bus. Insider). Another article from the same day claimed Dr. Oxman “admitted to lifting passages from other scholars’ work in her dissertation” and “admitted the plagiarism” (K. Long, et al., Academic celebrity Neri Oxman plagiarized from Wikipedia, scholars, a textbook, and other sources without any attribution).

On January 7, 2024, Business Insider kept up the false narrative, reporting that Bill Ackman noted the probability of academics incorrectly citing others’ work following his wife’s alleged admission of plagiarism (K. Tangalakis-Lippert, Bill Ackman says it is a ‘near certainty’ that academics will improperly cite others’ work after his wife admitted to plagiarism, Bus. Insider).

Business Insider CEO Barbara Peng continued to support the fabricated account in a statement on January 14, 2024, asserting that the articles concerning Dr. Oxman were factual and well supported by evidence. However, the original January 4 article, which wrongfully characterized Dr. Oxman’s statement as an admission of plagiarism, was the sole article hyperlinked in all subsequent ones, rather than Dr. Oxman’s original post. This editorial decision seemed to deliberately obscure the truth from readers and impedes their ability to validate Business Insider’s claims, indicative of a targeted effort to falsely accuse Dr. Oxman of plagiarism.

V. Business Insider Falsely Accused Dr. Oxman Of Engaging In A Quid-Pro-Quo Relationship With Jeffrey Epstein—Falsely Describing It As A “Brewing Scandal” When It Was Business Insider Who Sought To Create A Scandal.

Business Insider has been accused of falsely implicating Dr. Neri Oxman in a quid-pro-quo relationship with convicted felon Jeffrey Epstein. The allegations stem from a January 4 Business Insider article suggesting that Oxman, wife of Bill Ackman, made a sculpture for Epstein in return for a \$125,000 donation. However, both Oxman and Ackman insist that these allegations are false: Oxman had only met Epstein once at a fundraising presentation at MIT, directed by MIT Media Lab Director Joi Ito, where Epstein later agreed to donate to her lab. Oxman sent Epstein a 3-D printed object at Ito's direction two years later. Ackman denies attempting to hide this interaction in his single email conversation with Ito, shared with the Boston Globe.

Furthermore, Business Insider asserts Ackman pressured MIT to keep Oxman's association with Epstein secret. Ackman counters he only asked Ito not to mention Oxman's name due to her lack of involvement with Epstein's donation or MIT's decision to accept it. He believes these facts were misrepresented by Business Insider who knew the truth, as indicated in the linked Boston

Globe article. Other media outlets echoed Ackman's explanation, saying he simply asked MIT to avoid naming his wife.

After the article's publication, Fran McGill, head of communications for Ackman's investment firm, told John Cook, Business Insider's executive editor, there had been no quid-pro-quo exchange. McGill cited an excerpt from the Boston Globe article, stating Ito asked Oxman's design lab, which often produced donor gifts, to send appreciation token to Epstein.

In response, Business Insider stealthily altered its claim, stating that Ackman pressured MIT to keep Oxman's name out of a scandal over an original sculpture she gave to Epstein in thanks for a \$125,000 donation to her lab. Despite ethical requirements, Business Insider didn't acknowledge the correction and is being criticized for continuing to imply an undisclosed scandal involving Oxman and Epstein.

VI. Driving Home Its Retaliatory Intent, Business Insider Intentionally Published Dr. Oxman's Home Address, Doxing Her And Her Family To Hundreds Of Millions Of Readers And Social Media Followers.

Dr. Oxman was wrongly accused by Business Insider of purposeful plagiarism and academic fraud, as well as engaging in an improper exchange with Epstein. Furthermore, the publication exposed Dr. Oxman's personal information by irresponsibly printing her home address, thereby creating security risks for her and her family. This unethical action was taken in the January 4 article, "Bill Ackman's celebrity academic wife Neri Oxman's dissertation is marred by plagiarism," where the address was irrelevant to the content of the article. This violates basic journalism ethics, which advocates respect towards individuals and their privacy. Business Insider not only compromised these ethics, but also flouted the guidelines that disallow doxing. The unnecessary revelation of Dr. Oxman's home address potentially endangers her and her family's safety. Primary author of the article, Long, had previously engaged in doxing in her reporting. The illegitimate inclusion of Dr. Oxman's personal information in the article further exemplifies Business Insider's recurrent negligence of ethical journalism standards, suggesting malicious intention. This was seen in cases like *Harte-Hanks Commc'ns, Inc. v. Connaughton*, *Eramo, Kerwick v. Orange Cnty. Publ'ns Div. of Ottaway Newspapers, Inc.*, and *Morsette v. The Final Call*. Refusing to remove the disclosed address after-the-fact provides additional evidence of malice, such as in *Zerangue v. TSP Newspapers, Inc.*

VII. Business Insider Reinforced Its False Claim—That Dr. Oxman Admitted To Intellectual Theft And Fraud—And Compounded The Significant Damage Resulting From It By Falsely Claiming That Dr. Oxman And Ackman Did Not Dispute The Facts In Business Insider's Articles.

In response to Ackman's public condemnation of Business Insider's alleged misinformation and defamation regarding Dr. Oxman, the publication maintained its position, claiming a lack of dispute over its reports from Dr. Oxman and Ackman. Business Insider and its owner, Axel Springer AG, repeated this narrative. On January 7, 2024, an Axel Springer spokeswoman stated the facts in the Business Insider reports were unchallenged, supported by similar claims made by Business Insider Editor-in-Chief, Nicholas Carlson. Yet Ackman decisively refuted the reported facts both publicly and directly to multiple individuals connected to Business Insider and Axel Springer, including Business Insider's founder, Henry Blodget, and Axel Springer CEO Mathias Döpfner.

Despite detailed rebuttals of the articles' claims, the false narrative that the facts of Business Insider's reporting were undisputed remained in circulation. Adib Sisani, Axel Springer's head of communications, even suggested in an interview with Puck, that Ackman was "completely losing it," insisting the facts of the story were without question. Blodget had assured Ackman that there would be an investigation into the accuracy of the articles and the processes leading to their publication, but Business Insider declined to correct the stories even after verification of key errors was presented. Axel Springer's CEO also claimed to be unaware of Ackman's disputed claims. Consequently, Ackman corresponded with the CEO, pinpointing inaccuracies in the Business Insider articles and expressing his dissatisfaction that his disputes were being ignored.

a. Business Insider's Coverage Of Dr. Oxman Was Driven By Biased, Anti-Zionist, And Purportedly Antisemitic Employees Seeking To Retaliate Against Ackman For His Criticism Of Former Harvard President Gay.

Business Insider has been criticized for its reporting on Dr. Oxman, colored by its progressive political bias and its anti-Zionist reporters' inclination to malign a high-profile Jewish advocate and his family. Notably, Henry Blodget, the Founder and Chairman of Business Insider, who once settled SEC charges for fraudulent research, played a key role in running a misleading journalistic campaign. Details pertaining to Blodget's history with the SEC are paradoxically unmentioned on the website of Insider Inc., the owner of Business Insider.

Blodget's problematic past includes writing an antisemitic article in 2012, titled "Why Do People Hate Jews?,". Backlash to the article caused its title to be changed and comments to be disabled. John Cook, executive editor for news at Business Insider and pointman for the defamatory articles against Dr. Oxman has a history of problematic journalism; ranging from unsavory high-school writings encouraging suicide and racist content to defending the illegal release of celebrity sex tapes at Gawker. Cook has been labeled a "Jew-hating" individual who criticizes Israelis as "occupiers" and "ethnic national[ists]" by his wife.

Katherine Long, an investigative reporter for Business Insider who wrote many of the negative articles on Dr. Oxman, has a track record of pro-Palestinian, anti-Zionist views dating back to her college days. Typical of her sentiments are tweets such as criticizing “billionaire Henry Kravis” for “throwing a party for multimillionaire Henry Kissinger.”, both of whom are Jewish.

Given the anti-Israeli views of Cook and Long, and the supposed antisemitism of Blodget, it is not surprising that they targeted Dr. Oxman, an Israeli Jew, and Ackman, a Jewish advocate combating antisemitism on university campuses. The intention apparently was to catalyze Dr. Oxman's dismissal from MIT as a punitive measure against Ackman for his activism against antisemitism at top-tier American universities and his calls for the resignation of the universities' presidents.

b. Business Insider's Coverage Of Dr. Oxman Was Motivated by Its Desire To Get Dr. Oxman Fired by MIT.

Oxman Disassociated from MIT. On January 3, 2024, at 10:29 PM, Long sent an email with a misleading subject line alleging that Neri Oxman had committed plagiarism on her 2010 thesis. Long detailed five supposedly plagiarized entries and suggested that this issue was under investigation due to her husband Ackman's demand for Harvard President Claudine Gay's resignation. Long also inaccurately asked if Oxman expected to remain at MIT despite the plagiarism allegations. However, Oxman had already left MIT in 2020 to establish OXMAN in New York City. Long signed off her email seeming pleased at the potential harm this might cause Oxman and Ackman.

Fran McGill, the head of communications at Ackman's firm, clarified that Oxman had no professional connection with MIT any longer. Yet, John Cook, Long's boss, insisted on documentary proof of this disassociation, hinting that Business Insider was intent on causing Oxman's firing.

Business Insider, represented by Blodget, Cook, and Long, appeared bent on deviating from ethical journalism standards by trying to actively dictate news rather than objectively reporting it. They skilfully used minor clerical errors to allege that Oxman had deliberately plagiarized content. Furthermore, they aimed for Oxman's resignation from her non-existent MIT position, anticipating a subsequent flurry of reporting to increase audience engagement and promote their far-left and anti-Zionist narrative.

They used Oxman's confirmation of five minor citation errors to falsely claim that she'd confessed to academic fraud. Furthermore, they formulated an additional 28 false plagiarism claims, thereby giving Oxman insufficient time to counter these allegations. This shady course of action enabled them to manipulate public perception into believing Oxman had admitted guilt,

which wasn't the case. Therefore, their actions tarnished the principles of ethical journalism that stress neutrality, openness, fairness, and precision in reporting.

c. A Comparison Of Business Insider's Reporting on Allegations of Plagiarism By Claudine Gay Demonstrates Its Mistreatment Of Dr. Oxman

The coverage on Dr. Oxman by Business Insider shows a possible bias against her. Comparing its reporting on Dr. Oxman to alleged plagiarism by former Harvard President Claudine Gay reveals disparate treatment. Business Insider claimed similarities between the two, but their reporting suggested otherwise. On December 21, 2023, an article on Gay focused on her failure to cite “duplicative language” correctly in some papers, yet the report on Dr. Oxman accused her dissertation of being “marred by plagiarism.” Gay’s review described “instances of inadequate citation,” and similar issues, but Harvard found no ‘intentional deception or recklessness’.” By contrast, Dr. Oxman was accused of stealing “sentences and whole paragraphs from Wikipedia, other scholars, and technical documents in her academic writing.” The question arises why Business Insider exhibited such a significant disparity in treatment between Gay and Dr. Oxman.

Business Insider’s intent seems to have been to protect Gay due to political alignment and to smear Dr. Oxman arising from disagreement with her husband’s political views. Despite the disparity in the reporting, Business Insider's Editor in Chief, Nicholas Carlson and CEO Barbara Peng have stood by the newsroom. These statements raise concerns since journalists Cook and Long appear to have ignored journalistic integrity and objectivity.

d. Business Insider Acted With Actual Malice Because Its Coverage Was Intentionally Designed To Deprive Dr. Oxman Of A Meaningful Opportunity To Comment—And Then Business Insider Publicly Lied About What It Presented To Dr. Oxman

Business Insider's January 5, 2024 article, “Academic celebrity Neri Oxman plagiarized from Wikipedia, scholars, a textbook, and other sources without any attribution” was published without giving Dr. Oxman appropriate time to respond to the allegations. The author, Long, had presented five minor citation errors to Dr. Oxman the day before and had received a public apology. However, at 5:19 PM on January 5, Long sent a 7,071-word email to Pershing Square’s head of communications, containing 28 new allegations of supposed plagiarism and demanding immediate comment as the article was intended to be published that evening. The article was indeed published 92 minutes later.

This rush to publish contradicts ethical journalism practices that necessitate giving subjects of news stories with claims or criticisms against them a fair opportunity to respond, as outlined by the Society of Professional Journalists and Business Insider’s own "Ethics Policy". The length and complexity of Long's email made it impossible for Dr. Oxman to fact-check the allegations

in the short time given. Business Insider knew fact-checking 28 allegations of plagiarism would be a significant undertaking, especially given the 13-year-old dissertation referenced in the allegations.

Another issue was Business Insider's knowledge that for Dr. Oxman to effectively respond, she would have to access academic texts, hardware manuals, and her own dissertation; these were all either outdated or not readily available on the internet. This would have been an impossible task given the 92 minutes she was allotted before the article's publication. Business Insider seemed to have no intention of giving Dr. Oxman a fair opportunity to respond since the facts it used had been in possession of the author from the previous day. Furthermore, Long sent her email at a time she knew Dr. Oxman, an Israeli Jew, would be observing Shabbat, a further indication of sandbagging the recipient.

Business Insider wasn't under any pressure to publish the article in such haste. No other media outlets were seeking comment, and the story was not shared with other publications. The rush to publish, despite not being urgent news, suggests maleficence. Additionally, the allegations sent to Dr. Oxman were presented differently than what was published in the article. The published version was more digestible, featuring highlighted comparison graphics possibly prepared in advance. These graphics could have aided Dr. Oxman's response but were intentionally not included in the email she received.

Long's public response on X regarding criticism of excluding Dr. Oxman from the allegations constitutes malice and suggests tainted journalism. Her claim that side-by-side comparison graphics were sent to assist Dr. Oxman in the research is false; the email sent was to the head of communications for Dr. Oxman's firm, was poorly formatted, and lacked the mentioned graphics. Long's misleading comments on X were intended to create public perception that Dr. Oxman and Ackman avoided her claims due to a lack of substantive response or desire to hide from investigative journalism. This constitutes malice, as defined by the court in *Westmoreland v. CBS Inc.*, 596 F. Supp. 1170, 1174 (S.D.N.Y. 1984).

e. Business Insider Acted With Actual Malice Because It Refused To Retract Its Coverage And Instead Doubled Down.

From January 5-7, Ackman demanded Business Insider and Axel Springer retract false reporting notified during the previous discussions, like the 38-minute call with Blodget where Ackman asked for story withdrawal while investigation unfolded. Ackman mentioned speaking to Varsavsky, supporting the articles' retraction. On January 7, Ackman reiterated his issues with Blodget and Varsavsky who acknowledged the concerns but then issued statements maintaining the reporting accuracy – a contradiction given Ackman's prior objections by phone and in

writing. Subsequently, on January 8, Ackman texted Döpfner expressing the statement's detrimental impact on Dr. Oxman's reputation.

Ackman's subsequent WhatsApp messages to Döpfner detail his disagreements with Business Insider's coverage. Despite requesting withdrawal of articles during the investigation, Business Insider declined. On January 14, 2024, CEO Barbara Peng upheld the stories' accuracy and documentation post their "investigation." peng's statements were false and revealed a potential bias in its approach. Specifically, Dr. Oxman, unrelated to Ackman's antisemitism campaign against universities, was mistakenly presented as a "fair subject." More than that, the reporting process and article timings, including the claims of accuracy and documentation, were incorrect and influenced readers against possible benign explanations. Media is obliged to correct promptly and openly upon discovering errors - yet in contrary, these organisations solidified the false coverage marking violations of journalistic standards and suggesting actual malice.

f. Business Insider Acted With Actual Malice Because Its Coverage Was, In Part, Motivated By Greed.

Business Insider is accused of acting with actual malice, being motivated by greed in its reporting. Ackman's hit-pieces were recognized as a means to attract massive readership, yielding substantial revenue through advertising, subscriptions, and licensing. Traffic is central to Business Insider's income, demonstrated by real-time viewer rankings displayed prominently in their lobby. This conduct drew in enormous attention; Ackman's claims were labelled as globally trending, leading to thousands of accompanying articles, many echoing Business Insider's false statements. Over two thousand such articles were published in less than two months, generating over seven billion potential impressions across multiple platforms. Most top articles included Business Insider's spurious plagiarism allegations about Dr. Oxman.

Should this case reach court, inquiries will be made into the revenue Business Insider and Axel Springer derived from these publications, assessing their financial circumstances in relevance to a claim for punitive damages, as supported by N.Y. Pattern Jury Instruction § 3:30, and the *Rombom v. Weberman* case. This concerns the alleged defamation reaching millions globally, influencing the jury's decision on potential damages incurred.

IX. Dr. Oxman Is An Extraordinary Scientist, Designer, Architect, and Former Tenured Professor At MIT Whose Reputation Has Been Materially Damaged By Business Insider.

Dr. Oxman, prominent in material ecology, has a vast educational background, beginning with pre-medical studies at the Hebrew University of Jerusalem and undergraduate studies in Architecture and Urban Design at the Technion Israel Institute of Technology. She obtained her Master of Architecture Degree / Diploma from the Architectural Association (“AA”) in London,

completing both the AA Final Examination approved by the Architects Registration Board and the Royal Institute of British Architects Part 2. She enrolled in the Ph.D. program at MIT as a Presidential Fellow and successfully defended and published her doctoral dissertation titled, “Material-based Design Computation.” Dr. Oxman pioneered an approach to design that integrates form, material, and structure incorporating physical form-finding strategies with digital analysis and fabrication. She became a Professor of Media Arts and Sciences at MIT, receiving a tenure track faculty position immediately proceeding her Ph.D., obtaining tenure in 2017.

During her time at MIT, she was part of the Media Lab faculty, focusing on the study, invention, and creative use of digital technologies. Known for her compassion and dedication, Dr. Oxman was appreciated by her students and colleagues. She was awarded the Collier Medal from MIT after utilizing her developed technologies to assist a student's inoperable tumor surgery, which extended his life by four years. Her work has been showcased in over 116 exhibitions internationally, with several museums holding permanent collections, including MoMA. Dr. Oxman's work has resulted in 87 published papers, 15 patents, and 200 invited talks. Following her marriage to Ackman in 2019 and departure from MIT in 2020, she founded OXMAN, a science, research, architecture, and design firm. However, accusations of intentional plagiarism, propagated by Business Insider, have negatively impacted her reputation, with troubling consequences such as threats of physical harm and loss of featuring in National Geographic Magazine.

X. Business Insider Must Correct The Record And Retract Its False Claims That Dr. Oxman Intentionally Plagiarized And Committed Intellectual Theft.

Business Insider's defamatory articles have wrongly accused Dr. Oxman of blatant plagiarism and have caused irreparable damage. Both Axel Springer and Business Insider have shown actual malice and are at substantial legal risk. To mitigate the harm caused, the entities must rectify their reporting, clear the record, publicly apologize to Dr. Oxman and Ackman, and create a fund for other victims of their malicious reporting. Dr. Oxman does not seek compensation but wants resources available for other victims. Noncompliance will only add to their legal liability and further affirm the malice. We expect you to address these issues responsibly and to respect Dr. Oxman's hard-earned reputation. Until resolution, preservation of all related documents, communications, and other materials must be ensured, and this letter and preservation notice should be forwarded to all confidential sources with whom Business Insider communicated for the articles.

PEOPLE & ENTITIES MENTIONED

Dr. Neri Oxman: A former tenured faculty member at MIT and CEO of OXMAN, a science, research, architecture, and design firm. She was accused by Business Insider of plagiarizing in her doctoral dissertation and other published works. The articles published by Business Insider branded Dr. Oxman as an intellectual thief and a fraud, accusations that she, along with the support outlined in the letter, firmly denies.

Bill Ackman: Dr. Oxman's husband, whom Business Insider's report suggests was the true target of the defamation due to his criticism of presidents from Harvard University, the University of Pennsylvania, and MIT regarding their handling of antisemitism on their campuses following a terrorist attack against Israel. The report argues that Business Insider aimed to retaliate against Ackman by attacking Dr. Oxman.

Dr. Konrad Wartenberg and Dr. Mathias Döpfner: General Counsel and Chairman/CEO of Axel Springer SE, the parent company of Business Insider, respectively. Addressed in the letter which demands action on their part to correct the record and retract the false claims made against Dr. Oxman. They are indirectly implicated in the alleged journalistic misconduct through their association and responsibility for Business Insider.

Axel Springer SE: The parent company of Business Insider. The letter calls into question the responsibility of Axel Springer in overseeing the conduct of its subsidiary and ensuring ethical reporting standards are met.

Business Insider: The media outlet that published a series of articles accusing Dr. Oxman of plagiarism. The letter alleges that Business Insider, influenced by personal biases against Oxman and Ackman, published false and defamatory claims to tarnish Dr. Oxman's reputation in retaliation against Bill Ackman.

Elizabeth M. Locke, P.C.: The attorney representing Dr. Neri Oxman, who wrote the detailed letter outlining the accusations against Business Insider and the individuals involved, asserting that the reporting was false, defamatory, and damaging.

Katherine Long: An investigative reporter at Business Insider, identified as having an anti-Zionist background and purportedly holding antisemitic views, accused of spearheading the attack against Dr. Oxman due to political and personal biases.

Henry Blodget: The Founder and Chairman of Business Insider, previously censured and fined by the SEC, accused of having previously published antisemitic articles, and suggested to have motivated personal biases in the reporting against Dr. Oxman.

John Cook: Business Insider's Executive Editor with a controversial background, accused of having a history of unethical behavior. The letter suggests he played a significant role in the publication of the defamatory articles against Dr. Oxman.

Claudine Gay: Former President of Harvard University, criticized by Bill Ackman for her handling of antisemitism on campus. Her situation is paralleled with Oxman's in the letter, as both women faced scrutiny over alleged academic misconduct. However, the response and framing of allegations by Business Insider were markedly different, with Gay receiving a more neutral treatment compared to the severe accusations directed at Oxman.

A. Benedikt, Danny Hillis, John Maeda, Sir Norman Foster: While not directly involved in the defamation case, these individuals are significant in establishing Dr. Oxman's credibility and the impact of the alleged defamation on her professional standing. Their perspectives and contributions to Oxman's field underline the weight of the accusations and the potential loss to the academic and professional community due to damaged reputations.

Terry Gene Bollea (Hulk Hogan): Reference to Bollea's legal battle against Gawker Media illustrates the potential legal implications of defamation and the balance between freedom of expression and privacy rights. This example serves as a contextual backdrop, underscoring the seriousness of defamation suits and the consequences for media outlets.

TIMELINE

1996-1999	Dr. Neri Oxman completes pre-medical studies at the Hebrew University of Jerusalem.
1999-2002	Dr. Oxman undertakes undergraduate studies in Architecture and Urban Design at the Technion Israel Institute of Technology.
2002-2004	Dr. Oxman receives her Master of Architecture Degree/Diploma from the Architectural Association in London.
2005-2010	Dr. Oxman enrolls in the Ph.D. program at MIT as a Presidential Fellow and successfully defends her doctoral dissertation titled "Material-based Design Computation."
2010	Dr. Oxman becomes a Professor of Media Arts and Sciences at MIT immediately after receiving her Ph.D.
2014	Dr. Oxman is promoted to Associate Professor of Media Arts & Sciences at MIT.
2017	Dr. Oxman is awarded tenure at MIT.
2019	Dr. Oxman marries Bill Ackman and later leaves MIT to found OXMAN, a science, research, architecture, and design firm in New York.
2020	Dr. Oxman's work is showcased in a monograph exhibition at the Museum of Modern Art entitled "Neri Oxman Material Ecology."
2021	Katherine Long, a member of the Pro-Palestinian Coalition at her college, signs an open letter criticizing Israel's policies.
2021-2022	Various dates reflecting past behaviors and statements by individuals involved in the Business Insider report, including past instances of questionable professional conduct and public statements regarding Israel and academic integrity issues.
February 2022	SFMOMA hosts an exclusive exhibition of Dr. Oxman's work titled "Nature × Humanity Oxman Architects."
October 7, 2023	Terrorist attack against Israel leads to public criticism by Bill Ackman of the presidents of several universities for their responses to rising antisemitism on their campuses.
December 5, 2023	University presidents testify before Congress, leading Ackman to call for their resignations.
Early December 2023	Business Insider starts a series of articles on Ackman following his criticism of university leadership.
January 3, 2024	Business Insider reporter Katherine Long sends an email to Ackman and Pershing Square pressing for comments on alleged instances of plagiarism by Dr. Oxman.
January 4, 2024, at 2:28 PM	Business Insider publishes its first article about Dr. Oxman's alleged plagiarism.

January 4, 2024, a few hours later

Dr. Oxman acknowledges minor citation errors in her dissertation on X (formerly known as Twitter).

January 4, 2024, three and a half hours after Dr. Oxman's post

Business Insider publishes a follow-up article falsely claiming Dr. Oxman admitted to plagiarism.

January 5, 2024

Business Insider sends a 7,071-word email to Dr. Oxman and Ackman detailing 28 additional allegations of plagiarism and publishes an article on these allegations 92 minutes later.

February 21, 2024

Business Insider has published multiple articles, leading to widespread media coverage and public backlash against Dr. Oxman.

February 23, 2024

A detailed letter is sent to the Chairman and CEO as well as the General Counsel of Axel Springer SE, outlining complaints against the reporting by Business Insider, detailing the sequence of related events, and demanding corrective actions.

January 4, 2024

2:28 PM - Business Insider publishes its first article falsely accusing Dr. Neri Oxman of plagiarism in her doctoral dissertation. This article began the public smearing campaign against Dr. Oxman.

Shortly after publication - Dr. Neri Oxman posts on X acknowledging that in "four paragraphs" of her 330-page dissertation, she did not place the subject language in quotation marks, and in one sentence she paraphrased an author but inadvertently did not cite him. She apologized for these errors but did not admit to plagiarism, intentional or otherwise.

Approximately three hours and 30 minutes after the first article's publication - Without additional outreach to Dr. Oxman for further comments, Business Insider published a follow-up article that falsely claimed in its headline that "Neri Oxman admits to plagiarizing in her doctoral dissertation after BI (Business Insider) report." This article misrepresented Dr. Oxman's earlier X post.

January 5, 2024

Before 2:28 PM (exact time not mentioned) - Business Insider sends a 7,071-word email to Dr. Oxman and Ackman's representatives, demanding immediate response to 28 new allegations of supposed plagiarism in Dr. Oxman's work, with a plan to publish the article that same evening.

6:51 PM - Business Insider publishes another article titled, “Academic celebrity Neri Oxman plagiarized from Wikipedia, scholars, a textbook, and other sources without any attribution”. This publication came 92 minutes after the 7,071-word email sent to Dr. Oxman and Ackman's representatives, providing an unreasonably short time frame for them to respond to the new set of allegations. These actions showed an intent not to give Dr. Oxman a fair chance to respond, further damaging her reputation.

SELECTED TWEETS

Use of Twitter, now X social media platform, was cited with regard to responding to allegations, engaging in public discourse, rectifying misinformation, and seeking redress for perceived misrepresentations.

1. Dr. Oxman's Acknowledgment

After the publication of Business Insider's first article at 2:28 PM on January 4, Dr. Oxman posted on X acknowledging that in four paragraphs of her 330-page dissertation, she did not place the subject language in quotation marks, and in one sentence, she paraphrased an author but did not cite him. She apologized for these errors but did not admit to plagiarism, intentional or otherwise.

<https://twitter.com/NeriOxman/status/1742993073078947843>

2. Bill Ackman's Criticism and Defense

Ackman, Dr. Oxman's husband, publicly disputed the facts of Business Insider's reporting on X. He highlighted discrepancies in the portrayal of Wikipedia usage and other citation errors in Dr. Oxman's work, arguing against the notion that these constituted plagiarism. Furthermore, Ackman engaged in various posts explaining the differences between types of plagiarism and defending Dr. Oxman, indicating that the matter was one of clerical oversight rather than intentional intellectual theft.

Disputing that using Wikipedia for definitions is plagiarism and argued about the nature of plagiarism, especially in context to academic works and definitions.

<https://twitter.com/BillAckman/status/1743466850560720914>

Discussed different kinds of plagiarism and defended Dr. Oxman's use of Wikipedia in her dissertation, asserting that there was nothing wrong with using Wikipedia as a dictionary.

<https://twitter.com/billackman/status/1743792224020619450>

3. Katherine Long

Katherine Long, the investigative reporter involved in the Business Insider articles, was mentioned for her interactions on X that may reflect personal biases or perspectives influencing the reporting. This includes reactions to news events and criticisms targeting specific individuals, providing context to the accusations of biased reporting.

Long criticized “billionaire Henry Kravis” for throwing a party for “multimillionaire Henry Kissinger” in a post indicating her views on wealth and possibly her bias against individuals like Ackman and Dr. Oxman.

<https://twitter.com/ByKLong/status/1666214253660110849>

False claim she had presented Dr. Oxman and Ackman the side-by-side comparisons of the alleged plagiarism, which they later disputed.

<https://twitter.com/ByKLong/status/1743421456007274532>

4. Acknowledgment of Journalism Standards

An X user highlighted that Business Insider had doctored the text of Dr. Oxman’s dissertation. This was followed by a stealth correction from Business Insider, which then blocked the X user who pointed out the issue. This action was brought up to illustrate the platform's role in uncovering potential journalistic misinformation or alterations.

<https://twitter.com/WalterSobchakSr/status/1743092967349346745>

FACTS & LEGAL ANALYSIS

FACTS PRESENTED

Accusations Against Dr. Oxman: Business Insider published articles accusing Dr. Neri Oxman, a former MIT professor and CEO of OXMAN, of plagiarism in her doctoral dissertation and other scholarly works. These accusations were claimed to be false and defamatory, aimed at tarnishing her reputation in retaliation against her husband, Bill Ackman, for his criticism of the leadership at Harvard, the University of Pennsylvania, and MIT, especially regarding their handling of antisemitism.

Allegations of Bias and Malice: The letter alleges that Katherine Long, John Cook, and Henry Blodget of Business Insider, motivated by anti-Zionist and purportedly antisemitic views, orchestrated a smear campaign against Dr. Oxman. Instances from their pasts that might reflect their biases against Dr. Oxman and Ackman are detailed, highlighting their alleged malice and unethical journalistic practices.

Ethical Journalism Violations: The letter argues that Business Insider violated ethical journalism standards by misleadingly accusing Dr. Oxman of plagiarism without giving her a fair chance to respond, manipulating facts, and publishing inaccuracies. It cites various instances where Business Insider's conduct allegedly showed actual malice toward Dr. Oxman.

Comparison with Claudine Gay's Reporting: The letter points out a disparity in Business Insider's reporting on similar allegations against Claudine Gay, suggesting that Dr. Oxman was subjected to harsher and unfair treatment due to bias.

Business Insider's Impact on Dr. Oxman: The fallout from Business Insider's reports is detailed, including how Dr. Oxman's work and personal life were negatively affected. It mentions threats and hateful messages received by Dr. Oxman and highlights the broader implications on her reputation and professional achievements.

Demands for Retraction and Apology: The letter demands that Business Insider and Axel Springer (Business Insider's parent company) retract their false claims, correct the record, issue a public apology, and create a fund to compensate victims of their allegedly libelous reporting.

Preservation of Evidence: It concludes with a notice to Business Insider and Axel Springer to preserve all documents, communications, and materials related to the articles published about Dr. Oxman and Ackman, hinting at potential legal action.

LEGAL ANALYSIS

Based on the detailed information provided, it's evident that this situation involves allegations of defamatory reporting by Business Insider against Dr. Neri Oxman, a highly accomplished individual in the realms of academia, design, and architecture. The crux of the matter lies in Business Insider's publication of a series of articles accusing Dr. Oxman of committing plagiarism in her doctoral dissertation and other academic works. These accusations are claimed to be false and defamatory, aimed at damaging Dr. Oxman's reputation as a retaliation against her husband, Bill Ackman, for his criticism of certain university leadership and his stance against antisemitism following a terrorist attack against Israel.

Defamation and Actual Malice: The key legal issue revolves around defamation, a statement that injuriously affects someone's reputation. Given Dr. Oxman's status as a public figure, proving "actual malice" is crucial. Actual malice requires showing that Business Insider published false information knowingly or with reckless disregard for the truth. The detailed letter argues that Business Insider, motivated by a retaliatory agenda and possibly influenced by biases of key editorial staff, acted with actual malice in publishing and disseminating the false accusations of intellectual theft.

Defamation Per Se: The allegations against Dr. Oxman fall under "defamation per se," as accusations of plagiarism imply professional incompetence and intellectual dishonesty, which are seriously damaging to one's reputation, especially in academia and related professional fields. The letter effectively argues that these unfounded allegations harm her standing and future opportunities, requiring no further proof of damages.

Ethical Journalism Violations: The letter also paints a picture of unethical journalism practices, including failure to provide a fair opportunity for response, biased reporting, and failure to correct the record, which could support the argument of recklessness and malice.

Potential Remedies: The demand for a retraction, correction, public apology, and creation of a compensation fund for victims of alleged libelous reporting by Business Insider not only seeks to rectify the harm done to Dr. Oxman's reputation but also to hold the publication accountable for its reporting standards. Should this matter proceed to litigation, these demands may form the basis of the remedy sought in court.

Significance: This case underscores the complex intersection of free press rights and individual reputation protections, especially in the digital age where information spreads rapidly and can have long-lasting impacts on individuals' lives and careers. The high-profile nature of the individuals involved, coupled with the allegations of biased reporting stemming from political and personal motives, illustrates the challenges in balancing these competing interests.

Additionally, this case highlights the importance of ethical journalism standards and the potential legal repercussions of deviating from those standards.

In summary, the allegations against Business Insider concerning its reporting on Dr. Neri Oxman present a compelling narrative of potential defamation, with significant legal and ethical implications. The discussion of actual malice, defamation per se, and the demand for corrective actions all contribute to an intricate legal debate that may have broader implications for media standards and accountability.

FOOTNOTE SUMMARIES

1. An open letter to U.S. media outlines a critical view of media coverage of Palestine, prompting more nuanced, informed reporting on the Israeli-Palestinian conflict.
[<https://medialetterpalestine.medium.com/an-open-letter-on-u-s-media-coverage-of-palestine-d51cad42022d>]
2. Allison Benedikt discusses personal growth and a complex relationship with Zionism after experiencing Zionist summer camp.
[<https://www.theawl.com/2011/06/life-after-zionist-summer-camp/>]
3. Henry Blodget explores sources of anti-Semitism, examining historical and contemporary reasons for prejudice against Jews.
[<https://www.businessinsider.com/why-do-people-hate-jews-2012-5>]
4. Definitions of plagiarism from Merriam-Webster and Dictionary.com include unauthorized use or close imitation of another author's work without credit.
[<https://www.merriam-webster.com/dictionary/plagiarize>];
<https://www.dictionary.com/browse/plagiarism>]
5. MIT's guide on avoiding plagiarism emphasizes understanding academic writing and citation cultural conventions to prevent accidental plagiarism.
[<https://cmsw.mit.edu/writing-and-communication-center/avoiding-plagiarism/>]
7. MIT's definitions of research misconduct include fabrication, falsification, and plagiarism, emphasizing the importance of honesty in academic research.
[<https://policies.mit.edu/policies-procedures/100-academic-and-research-misconduct-and-dishonesty/101-procedures-dealing#10.1.2>]
8. Details MIT's procedural overview for handling allegations of academic and research misconduct.
[<https://policies.mit.edu/policies-procedures/100-academic-and-research-misconduct-and-dishonesty/101-procedures-dealing#10.1.4>]
10. Neri Oxman's tweet showcasing her stance or work without further context.
[<https://twitter.com/NeriOxman/status/1742993073078947843>]
11. Business Insider reports Neri Oxman admitting to plagiarism in her doctoral dissertation following their investigative report.

[<https://www.businessinsider.com/neri-oxman-admits-plagiarism-business-insider-article-apology-2024-1>]

12. Business Insider raises new concerns about attribution in the work of Harvard's president, Claudine Gay, along with other issues.

[<https://www.businessinsider.com/harvard-president-plagiarism-concerns-attribution-antisemitism-claudine-gay-university-2023-12>]

13. Reference to a text message exchange between B. Ackman and H. Blodget without providing content details.

14. The NPR Ethics Handbook emphasizes the importance of accuracy in journalism.

[<https://www.npr.org/templates/story/story.php?storyId=688139552>]

15. The SPJ Code of Ethics, outlining principles for ethical journalism including seeking the truth and acting independently. [<https://www.spj.org/ethicscode.asp>]

18. Article discusses issues of plagiarism and self-plagiarism in Neri Oxman's dissertation, referencing Miguel Roig's work on plagiarism.

[<https://ori.hhs.gov/sites/default/files/plagiarism.pdf>]

20. MIT's handbook explains common knowledge in academic writing to help distinguish what information requires citation.

[<https://integrity.mit.edu/handbook/citing-your-sources/what-common-knowledge>]

21. MIT advises on avoiding plagiarism through appropriate paraphrasing, highlighting the necessity of original expression in academic writing.

[<https://integrity.mit.edu/handbook/academic-writing/avoiding-plagiarism-paraphrasing>]

23. Business Insider uncovers instances of Neri Oxman plagiarizing from multiple sources, including Wikipedia, in her dissertation.

[<https://www.businessinsider.com/neri-oxman-plagiarize-wikipedia-mit-dissertation-2024-1>]

24. The Merriam-Webster dictionary defines "lift" in terms not provided in the summary.

[<https://www.merriam-webster.com/dictionary/lift>]

25. Business Insider clarifies that reusing material isn't formally against MIT's academic integrity code, within the context of discussing Oxman's dissertation.

26. BI found 15 instances of Oxman plagiarizing from Wikipedia's 'Weaving' article in her dissertation, highlighting widespread plagiarism concerns.

50. The SPJ Code of Ethics urges journalists to acknowledge and correct mistakes promptly and explain corrections clearly. [<https://www.spj.org/ethicscode.asp>]

51. A tweet from Walter Sobchak on an unspecified topic.
[<https://twitter.com/WalterSobchakSr/status/1743092967349346745>]

89. A collection of articles discussing reactions to Harvard president Claudine Gay's resignation and Bill Ackman's critiques of Harvard.
[<https://www.businessinsider.com/online-reactions-to-harvard-president-claudine-gay-resigned-2024-1>];
<https://www.businessinsider.com/yale-professor-slams-bill-ackman-campaign-against-harvard-2024-1>; <https://www.businessinsider.com/bill-ackman-says-he-is-not-a-right-wing-bully-2024-1>]

90. An email exchange among Fran McGill, John Cook, and others, context not provided in summary.

91. Neri Oxman's admission of plagiarism in her doctoral dissertation following a Business Insider report is highlighted.
[<https://www.businessinsider.com/neri-oxman-admits-plagiarism-business-insider-article-apology-2024-1>]

93. Comparison of plagiarism incidents by Claudine Gay and Neri Oxman, reflecting on their impact in academic and public spheres.
[<https://www.businessinsider.com/claudine-gay-neri-oxman-ackman-wife-plagiarism-dissertation-harvard-mit-2024-1>]

95. Bill Ackman comments on the inevitability of improper citations in academia following his wife's admission to plagiarism.
[<https://www.businessinsider.com/bill-ackman-plagiarism-near-certainty-neri-oxman-record-questioned-2024-1>]

96. CEO Barbara Peng of Business Insider addresses the organization's journalistic standards and commitment to integrity.
[<https://www.businessinsider.com/our-journalism-a-note-from-ceo-barbara-peng-2024-1>]

99. Rummeler's article describes a hedge fund manager's request to Joi Ito regarding Jeffrey Epstein's ties with Neri Oxman.

[<https://www.axios.com/2019/09/14/joi-jeffrey-epstein-ties-mit-media-lab-professor>]

100. This entry references the SPJ Code of Ethics provided by the Society of Professional Journalists, underscoring ethical journalism guidelines. [<https://www.spj.org/ethicscode.asp>]

101. Reference to an email exchange among Fran McGill, John Cook, and others dated January 4, 2024, not publicly available for direct review.

105. Katherine Long and J. Newsham discuss the plagiarism issues found in Neri Oxman's dissertation in their work.

106. This footnote leads to a December 2022 outline of Twitter's media policy, emphasizing the prohibition of sharing someone else's private information without explicit permission.

[<https://help.twitter.com/en/rules-and-policies/personal-information>]

107. A tweet by Katherine Long dated April 8, 2020. The specific content of the tweet isn't detailed here. [<https://twitter.com/ByKLong/status/1247740055981981698?s=20>]

108. An article from the New York Post on January 8, 2024, reporting Axel Springer's investigation into Business Insider's reporting of allegations of plagiarism against Bill Ackman's wife, Neri Oxman.

[<https://nypost.com/2024/01/08/business/axel-springer-launches-probe-into-business-insiders-reporting-on-neri-oxman/>]

109. A Talking Biz News article from January 7, 2024, where Business Insider's EIC Carlson reaffirms the outlet's stance on stories regarding Oxman.

[<https://talkingbiznews.com/media-news/business-insider-eic-carlson-stands-by-oxman-stories/>]

110. A January 5, 2024 tweet by Bill Ackman, the specific content of which isn't described here.

[<https://twitter.com/BillAckman/status/1743466850560720914>]

111. A tweet from Bill Ackman on January 6, 2024, the contents of which are not provided.

[<https://twitter.com/billackman/status/1743792224020619450?s=46&t=FKnrNlrAnZ2sDFQxwXpcoQ>]

116. Describes a text message exchange on January 7, 2024, between Bill Ackman and H. Kravis about undisclosed topics.

117. Documents a WhatsApp conversation between Bill Ackman and M. Varsavsky on January 7, 2024, specifics undisclosed.
119. A tweet from Bill Ackman dated January 7, 2024, without specified content.
[<https://twitter.com/BillAckman/status/1744119648705036337>]
120. This footnote refers to an article by D. Byers titled "A Season of Ackman's Life" published on Puck News, January 10, 2024. [<https://puck.news/a-season-of-ackmans-life/>]
121. Documents WhatsApp exchanges between Bill Ackman and M. Döpfner spanning January 9-10, 2024, without detailing the content.
122. Indicates an email correspondence between Bill Ackman and M. Döpfner on January 10, 2024, specifics not provided.
123. The SEC's press release from April 28, 2003, announcing Henry Blodget's permanent barring from the securities industry, also requiring a \$4 million payment.
[<https://www.sec.gov/news/press/2003-56.htm>]
126. Insider Inc.'s self-description and background available on their website.
[<https://www.insider-inc.com/who-we-are>]
127. An Institutional Investor article from July 28, 2020, highlighting how Henry Blodget pivoted to media after being banned from the financial industry.
[<https://www.institutionalinvestor.com/article/2bswzwy2s9zuvvhth43k/culture/henry-blodget-was-banned-from-the-financial-industry-so-he-built-a-financial-media-empire>]
128. Henry Blodget's exploration of the sources of anti-Semitism in a piece on Business Insider.
[<https://www.businessinsider.com/why-do-people-hate-jews-2012-5>]
129. A Jezebel article by J. Cook from January 4, 2013, addressing the personal reflections from being a "teenage word-bully."
[<https://jezebel.com/confessions-of-a-teenage-word-bully-5973276>]
130. Slate's coverage on January 7, 2013, of different perspectives on bullying, including Gawker's admissions.
[<https://slate.com/human-interest/2013/01/bullying-confessions-past-and-present-from-gawker-and-wnyc-s-radio-rookie.html>]

132. Courthouse News Service reports on a Gawker staffer's legal challenge against a subpoena from Hulk Hogan, dated February 12, 2015.

[<https://www.courthousenews.com/gawker-staffer-fights-hulk-hogan-subpoena/>]

133. A New York Times article from September 10, 2016, shifts focus to Gawker's new ownership and the deletion of six contentious posts.

[<https://www.nytimes.com/2016/09/11/business/media/gawkers-new-owner-deletes-six-posts-involved-in-lawsuits.html>]

134. The Hollywood Reporter's article from April 25, 2013, detailing Gawker's refusal to remove a post about a Hulk Hogan sex tape.

[<https://www.hollywoodreporter.com/news/general-news/hulk-hogan-sex-tape-gawker-446636/>]

136. Collection of works discussing Neri Oxman's admission to plagiarism in her doctoral dissertation.

137. Directs to an open letter on Medium addressing U.S. media coverage of Palestine.

[<https://medialetterpalestine.medium.com/an-open-letter-on-u-s-media-coverage-of-palestine-d51cad42022d>]

139. A tweet from Katherine Long on October 13, 2024, without specified content.

[<https://twitter.com/ByKLong/status/1712954804514009098>]

140. Katherine Long's tweet from June 6, 2023, details not provided.

[<https://twitter.com/ByKLong/status/1666214253660110849?s=20>]

145. The Washington Post's policies and standards as of June 30, 2022.

[<https://www.washingtonpost.com/policies-and-standards/>]

147. A piece on Business Insider discussing new concerns about Harvard's president related to attribution in her work.

[<https://www.businessinsider.com/harvard-president-plagiarism-concerns-attribution-antisemitism-claudine-gay-university-2023-12>]

150. Harvard President Claudine Gay is absolved from plagiarism accusations, as detailed on December 12, 2023, but notes the need for citation corrections in past articles.

[<https://www.businessinsider.com/harvard-says-president-claudine-gay-did-not-violate-plagiarism-rules-2023-12>]

158. A tweet by Katherine Long from January 5, 2024, the content of which is not provided. [<https://twitter.com/ByKLong/status/1743422082132869307>]

164. G. Cuofano's analysis of Business Insider's digital strategy, published on May 3, 2022. [<https://fourweekmba.com/business-insider-business-model/>]

165. An inside look at Insider Inc.'s new headquarters close to Wall Street featured on Business Insider, January 26, 2018. [<https://www.businessinsider.com/insider-inc-office-tour-2018-1>]

167. Describes a methodology for calculating the engagement ("interactions") and the reach ("potential impressions") of articles about Dr. Oxman on social media and other platforms, noting Business Insider's substantial traffic in January 2024.

168. Neri Oxman's publication on Material Ecology. [https://neri.media.mit.edu/assets/pdf/Publications_ME.pdf]

170. A detailed examination of Oxman's doctoral thesis on Material-based Design Computation at MIT's repository. [<https://dspace.mit.edu/handle/1721.1/59192>]

175. Overview of the MoMA and SFMOMA exhibitions featuring Neri Oxman's work. [<https://www.moma.org/calendar/exhibitions/5090>]; [<https://www.sfmoma.org/press-release/sfmoma-announces-exclusive-exhibition-nature-x-humanity-oxman-architects-opening-in-february-2022/>]

178. Profiles and interviews in major publications describing Neri Oxman's work and comparing her influence to Leonardo da Vinci. [<https://www.nytimes.com/2018/10/06/style/neri-oxman-mit.html>]; [<https://www.elle.com/culture/a28646115/neri-oxman-interview/>]

185. A piece from Architectural Digest highlighting the year 2019 as significant for Neri Oxman. [<https://www.architecturaldigest.com/story/the-year-of-neri-oxman-is-pretty-much-upon-us>]

186-190. References to Neri Oxman's scholarly work on topics ranging from robotic fabrication to biohybrid materials and honey bee architecture, demonstrating her interdisciplinary research and contributions to various scientific fields.

191-192. Mentions submissions through the Oxman.com contact portal, dated January 12, 2024, with sender names suggesting they may not be genuine inquiries.

FIGURE SUMMARIES

- Fig 1 Text message conversation.
The conversation is about the definition of "plagiarism" in academia, with a plan to narrow down the definition, and arrangements for a phone call between the participants.
- Fig 2 Excerpt from a document
The image depicts a page from the MIT Academic Integrity Handbook discussing "What is Common Knowledge?" It explains that common knowledge is information that the average, educated reader would accept as reliable without having to look it up, including information most people know, information shared by a cultural or national group, and knowledge shared by members of a certain field, which may not be considered common knowledge in a different culture, nation, academic discipline, or peer group.
- Fig 3 Text document or presentation slide related to research misconduct.
Lists definitions of research misconduct such as fabrication, falsification, plagiarism, and deliberate interference according to the MIT Office of the Vice President for Research.
- Fig 4 Educational document
Title "Accidental Plagiarism" from MIT's Writing and Communication Center, discusses how accidental plagiarism often occurs due to a misunderstanding of the cultural conventions of academic writing and citation, particularly in Western countries where there is a belief that writers own their ideas and words. Reference made to John R. Edlund's explanation in "What Is 'Plagiarism' and Why Do People Do It?".
- Fig 5 Educational document
Botched Paraphrasing: Paraphrasing is the process of turning a source passage into our own words. It is another way that we can unintentionally slip into plagiarism if we use phrasing from the original or use the ideas without proper citation.
- Fig 6 Educational text snippet
Difficult Concepts: In addition to cultural confusion, we might slide into plagiarism when we discuss concepts that we do not understand, and using the author's words seems the best way to convey those ideas to our readers. If we quote those words and cite the source, we take a key step to avoid plagiarism. Unless we actively engage with the ideas themselves (e.g., paraphrase them in our own words after the

quotation, summarize them, or, better still, argue or support them with our own ideas and evidence), we have not fully assimilated the ideas (but at least we have not plagiarized).

- Fig 7 Excerpt from a text document
The image contains a page from the "MIT Academic Integrity Handbook," specifically page 20, discussing "Avoiding Plagiarism"
- Fig 8 Text document
MIT Standard of Proof for Research Misconduct, Office of the Vice President for Research
- Fig 9 Image of a document comparing text excerpts for plagiarism analysis.
The image displays side-by-side text from Claus Mattheck and Neri Oxman, with annotations indicating similarities and highlighting sections of a dissertation, suggesting a claim of plagiarism by Oxman from Mattheck without proper citation.
- Fig 10 Text comparison analysis.
The image depicts a comparison between Claus Mattheck's and Neri Oxman's texts with annotations suggesting that the insider highlights more text in Oxman's dissertation than is implicated in Mattheck's work and does not highlight where Dr. Oxman credits Mattheck's work.
- Fig 11 Screenshot of a Twitter post by Walter Sobchak.
Walter Sobchak tweets about BI authors presenting Oxman's discussion related to Mattheck's work by intentionally leaving out her citation and then stealth editing the image without issuing correction. Four columns of text comparing the works of "Mattheck" and "Neri Oxman" are visible in an image within the tweet.
- Fig 12 Text from an academic document
The text discusses axial forces on trees, explaining how the mass of tree branches exerts compressive stress on the trunk and the reaction of the soil to avoid sinking of the tree into the ground. It details the distribution of stress and the formation of non-circular cross-sections in trees due to bending stress, and how tree roots may resemble an I-beam shape for optimized stress distribution, citing Mattheck (1998).
- Fig 13 Screenshot of a dissertation page.
The text discusses advancements in biomimetic optimization and references the work of Prof. Claus Mattheck on simulating knot healing in trees as part of the design and optimization process. Mattheck aims to develop computational routines

for shape optimization inspired by natural growth and refinement processes to create objects that are lightweight yet durable. This is achieved by reducing excess material in non-load bearing regions through a process referred to as Soft Kill Optimization (SKO).

- Fig 14 Excerpt from a dissertation document.
Section 4.7.4 Summary discussing SKO method, external loads, application of FEM, SKO, and CAIO techniques for optimizing lightweight and durable components in design using evolutionary structural optimization as developed by Mattheck and team, involving Computer Aided Optimization (CAO), Soft Kill Optimization (SKO), and Computer Aided Internal Optimization (CAIO) for structural integrity and material usage.
- Fig 15 Academic document or dissertation with citations and references.
"Manual deseccration of the soft-kill optimization (SKO) method developed by Prof. Claus Mattheck, director of the Research Center at Karlsruhe (Mattheck 1998). Left and right images display the rationalization of the method using the Generative Components software without and with variable geometrical features respectively."
"[215] Mattheck, C., Design in nature: learning from trees, Springer, 1998."
Noted annotations: "P. 132 of Dr. Oxman Dissertation" and "P. 318 of Dr. Oxman Dissertation"
- Fig 16 Screenshot of a web page
MIT adds guidance about citing Wikipedia in its Academic Integrity Handbook in 2013, stating that Wikipedia is not a reliable academic source and advising against using it or other wikis and collaborative information sites as sources in academic papers. It suggests using the bibliography at the end of Wikipedia entries to find potential sources but warns not to assume these are reliable without applying the same criteria as for any other source.
- Fig 17 Academic document
The Great Mosque of Djenné is the largest mud-brick (or adobe building) in the world and is considered by many architects to be one of the greatest achievements of the Sudano-Sahelian architectural style, with Islamic influences. Source
- Fig 18 Academic document excerpt on Baidarka Kayak
Figure 3.12: The Baidarka Kayak was made as an assembly of wood and bone construction for maximum strength and flexibility on local areas of the kayak. The "bifurcated" bow was one of the predominant features of such highly crafted constructions. Source: <http://en.wikipedia.org/wiki/Baidarka>

- Fig 19 Diagrams and photo of kayak construction.
Rib forming of a Baidarka kaya: the "bifurcate" bow was one of the predominant features of such highly crafted constructions and served as the main structure upon which the intermediate rib structure rests. Source:
<http://en.wikipedia.org/wiki/Baidarka>
- Fig 20 Tweet
"I like the people who send me angry emails when I publish the addresses of billionaires' homes. "THEY HAVE A RIGHT TO PRIVACY!"
- Fig 21 Screenshot of a Twitter post
The Twitter post by Bill Ackman contains a series of questions related to defending oneself against accusations of plagiarizing Wikipedia, the dynamic nature of Wikipedia, whether Wikipedia is copyrighted, and the specifics of plagiarism accusations timing related to an article's publication on a Friday evening.
- Fig 22 Text document with title and date
The document discusses AI plagiarism review for faculty papers post a recent event. It debates whether all kinds of plagiarism are equal, suggesting some may arise from being human and unintentional, while intentionally stealing ideas is a more serious offense. It considers the nuances of using sources like Wikipedia as reference without citing, presenting an opinion on the matter as non-plagiaristic in certain contexts.
- Fig 23 Screenshot of a text message conversation.
Thanks, Bill. I read your posts. (If you ever get sick of managing money, you will be in great demand as a writer. I know from experience that it is harder than it looks!) After spending a lot of time over the past few weeks looking at and thinking about the definition of "plagiarism" (and some cited examples), I agree with you about it. Academia needs to narrow the definition. There's a big difference between clerical oversights and intentional theft and misrepresentation. And there should be a clear delineation between the two. I'm actually planning to write about that myself this week. If you're still free today, happy to call you whenever convenient between 10-2.
- Fig 24 Screenshot of text messages
- Henry, I would be grateful if you would call me at your convenience. Thank you.
Bill Ackman
- I just off the phone with Henry Blodget. I don't think we will need to speak about

this. But Neri and I would love to see you and MJ under more pleasant circumstances

Fig 25

WhatsApp conversation

- "I just got off with Henry Blodget. Why don't you speak with him and then let's talk after? I appreciate your reaching out."

- "Done and agree"\nImage 3: "Just tried you I am in a car in the countryside of Uruguay poor signal Will have better signal in half an hour"

Fig 26

Text excerpt from an article or interview.

Statements by Adib Sisani to Susan Pluck

In a phone call this week, Sisani told me that the company launched the review because Axel took Ackman's accusations so seriously—chiefly, the insinuation that targeting Oxman, who was born in Israel, was antisemitic or anti-Zionist. "That's a very hard red line," Sisani said of Ackman's assertions. "Those are accusations that we're going to make triple-sure are outrageous and not based in reality." Still, Sisani conceded, "most people underestimated the way that Bill Ackman is completely losing it."

according to Sisani, it appears he's unlikely to force B.I. to concede defeat. Axel and Business Insider will conclude their review in a matter of days, Sisani said, but, he added, "the outcome of the review is pretty clear." Sisani continued: "We believe in our own editorial standards. Of course there's not a bias in the sense that his wife is Jewish—that's so far out there. What remains is: Did we give him and his wife enough time to comment? I'm sure there's an email trail that's easily reviewed. Could there be an outcome where maybe we give them an hour extra?" Sisani also acknowledged that some of B.I.'s reporters "could be seen as spiking the football" with their own seemingly impartial posts on social media, rather than "letting the story speak for itself." Nevertheless, he said, "the facts of the story stand. I'm certain the sourcing and technical journalistic work done was spotless."

Fig 27

Screenshots of a smartphone text message conversation and tweets.

- "Matthias it is Bill Ackman. It is urgent that we speak immediately. It is 2:45am in NYC where I am calling from so perhaps this will help you understand the urgency of this call." \n- "I did of course dispute the facts to Henry Blodget so your statement is material false, misleading and damaging to Neri"

- "How Claudine Gay's plagiarism compares to that of Neri Oxman"

- "The whole premise of the article was that Bill Ackman sought to remove President Gay for plagiarism. This gave the Biythe excuse to write the story when they called Neri a celebrity."

- "I just found a fourth article which is materially misleading"

- Fig 28 Screenshots of a text messaging app
Matthias Dopfner texting about an issue involving a person named Nerri, mentioning plagiarism, and questioning the truth of a paragraph in a Boston Globe article.
- Fig 29 Screenshots of Tweets
Hedge fund manager Joel Joffe to keep his wife's name out of Jeffrey... Epstein ties-mit-media-lab-professor Neri Oxman on V... I was forwarded an email this morning from a reporter at Business... insider who noted that there are four paragraphs in my 330-page Ph.D dissertation, "Material-based Design Computation," which I completed at @MIT in 2010, This was Neri's statement issu... basis for BI saying that she was... plagiarist... Please read it. These are clearly clerical errors with no intent to steal intellectual property... She cited Mahtech 8 out of 9 times. She failed to cite him month in a benign sentence she paraphrased... This is false
- Fig 30 Screenshots of a text conversation
The text conversation discusses an article claiming someone named Neri Oxman admitted to plagiarism and insider trading, discusses the basis of the legal findings and implications on a professor's career, and mentions the impact of such allegations.
- Fig 31 Text message conversation screenshots
'- This is false:', "An analysis by Business Insider found a similar pattern of plagiarism by Ackman's wife, Neri Oxman, who became a tenured professor at the Massachusetts Institute of Technology in 2017.", "There is nothing similar about their patterns of 'plagiarism'.", "Gay's appeared 51 times in 6 out of 11 articles. 55% of her work. And these were relatively short articles. Not 330-page highly technical theses.", 'Many more id not.', 'examples show theft of ideas, not just a few missing quotation marks.', ", '- Fixing again as spell check changed it. This shows you how easy it is to make a clerical error.', ", '- basics of four properly cited paragraphs that were missing quotation marks, and one sentence from an author who cited properly 8 other times in the dissertation.', ", '- A finding of plagiarism is a career ending finding. These findings are made extremely careful because of their life-destroying impact.', 'Among other things, the intent of the professor and the pattern of plagiarism are relevant to the finding.', 'If there are repeated findings about intentional theft of ideas, one is more likely to have been found guilty of plagiarism.', 'Here, there is clearly no intent.', ", '- The Simpson Thacher lawyer said that plagiarism is about the theft of ideas.']
- Fig 32 Screenshots of text message conversation

Matthias claims that Neri's ideas are original and accuses Business Insider of misleading material that harms his wife. He mentions catastrophic harm and emotional injury, citing that these stories were widely circulated. He says he disputed the facts to Henry Blodget in two conversations but was disregarded. In the third screenshot, the narrative suggests that despite warning signs, Neri admitted to childish behaviour which contradicts earlier statements, and an appeal is made for the retraction of statements.

- Fig 33 A series of three screenshots of text messages.
Text messages discussing disputes over facts, requests for public statement revisions, and addressing accusations of plagiarism related to Axel Springer and Neri Oxman.
- Fig 34 Collage of headlines about various scandals
The image contains headlines related to numerous scandals over the years, including tech scandals from 2018, 2019, and 2020, scandals involving Mark Zuckerberg and Facebook, a battery-related issue with Apple dubbed 'batterygate,' NSA spying, Boeing crashes, WeWork, and an admissions scandal involving a 'Desperate Housewives' star.
- Fig 35 Screenshot of an online article.
"Why Do People Hate Jews? Henry Blodget 6 minutes ago | 876 | 6"
- Fig 36 Image of a zine and a person
WE CAN SAY WHAT WE FEEL LIKE!, Who's Responsible For This
OUTRAGE!!!?????, NOTHING is free..., even the birds are chained to the sky -
BOB DYLAN, NEW YEAR'S ABSOLUTIONS
- Fig 37 Screenshot of social media posts.
Katherine Long @ByKLong are you freaking kidding me Semafor @semafor · Oct 13, 2023 SCOOP
- Fig 38 Email screenshot
- The email discusses the context of reporting calls for Harvard president Claudine Gay's resignation due to plagiarism.\n- It references a particular case where a highly paid faculty position is seen as setting a precedent for academic integrity at Harvard.
- The sender questions if the recipient's wife is expected to remain at MIT in light of plagiarism instances.
- The sender mentions CC'ing colleagues and provides availability details.\n- The email is signed off warmly by Katherine Long, with her pronouns listed below her name.

- Footer indicates the sender is associated with INSIDER, categorized under Business - Life - News.

Fig 39 Email screenshot

From: John Cook, Sent: Thursday, January 4, 2024 10:14 AM, To: Francis McGill, Cc: Jake Swearingen, Katherine Long, Subject: Re: Journalist on deadline I Plagiarism by your wife, Thank you Francis. We will hold off publication until 4 pm at the earliest with the intent of including a statement or response from Oxman and Ackman or you on their behalf. You also agreed that you would try to provide us with a timeline of Oxman's renunciation of tenure, any public announcements of that renunciation that may exist, and a clarification of her current employment relationship with MIT. We look forward to hearing back from you. thanks, john

Fig 40 Image depicting screenshots of news articles

1. "Harvard President Claudine Gay is cleared of plagiarism accusations but will have to correct past articles for citation issues"
2. "Harvard's president looked like she was in the clear — but there are new concerns about attribution in her work"
- 3. "Bill Ackman's celebrity academic wife Neri Oxman's dissertation is marred by plagiarism"
4. "Academic celebrity Neri Oxman plagiarized from Wikipedia, scholars, a textbook, and other sources without any attribution"

Fig 41 Text comparison image.

Left Column:

- Wikipedia entry for "Weaving," from 4/26/2010\n Both warp and weft can be visible in the final product. By spacing the warp more closely...
- Wikipedia entry for "Heat flux," from 11/10/08
Heat flux or thermal flux, sometimes also referred to as heat flux density or heat flow rate intensity is a flow of... (truncated for brevity)

Right Column:

- Neri Oxman, page 81: Both warp and weft can be visible in the final product. By spacing the warp more closely...(truncated for brevity)
- Neri Oxman, page 169: Heat flux or thermal flux, also referred to as heat flux density or heat flow rate intensity, is defined as the flow of... (truncated for brevity)'

Fig 42 Screenshot of a tweet with attached images

I sent these receipts, and dozens more, to @BillAckman earlier today, hoping they would help him do the research he said he had no time to do before blasting us here.
6:59 PM · Jan 5, 2024 · 6M Views

- Fig 43 Screenshots of a text message conversation
The conversation involves someone urgently asking the other party to return their call, handle a news story investigation and pending review, and mentioning that every minute increases damage to someone's reputation. Other aspects discussed include introducing the person to Mathias Döpfner, CEO of Axel Springer. The final message mentions that the story is the number one trending story on 'X' and compares its rank to the Princess of Wales.
- Fig 44 Screenshot of text messages
First image:
The sender expresses that an article on Business Insider is misleading, causing catastrophic harm to his wife, was a top trending story, and has led to widespread news coverage.
Second image: The sender disputes the facts of a story, mentioning a disputing conversation with Henry Blodget, and includes a Twitter link.
Third image: The sender describes a conversation about retracting an article, being told that Neri Oxman admitted to plagiarism, and requests a call after being brushed off.'
- Fig 45 Text Document
The text addresses the reporting on Neri Oxman, stating there was no unfair bias, the stories were newsworthy, the reporting process was sound, and the stories are accurate and facts well documented. Oxman and Ackman did not comment on the stories.
- Fig 46 Office lobby interior
Inside
- Fig 47 Table chart
The image contains text in tabulated form, listing different technologies and the number of projects, patents, theses, journal publications, other publications, major exhibitions, and permanent collections associated with each. Technologies listed are Biopolymers, Cofabrication Systems, Glass 3D Printing, Data Driven Material Modelling, Hybrid Living Materials, and Distributed Fabrication. Specific project names under these technologies include Aquajoya I, II, and III, Silk I and II, Synthetic Apiary I and II, Glass I and II, Lazzarus, Rottlace, Vespers I, II, III, Wanderers, Gemini, Musthri, Vespers III, Totem, and Digital Construction Platform.
- Fig 48 Presentation slides about glass

Project GLASS

- Fig 49 Magazine or publication layout on biopolymers
Project BIOPOLYMERS
- Fig 50 Concept design board for Project CONCRETE
Project CONCRETE
- Fig 51 Graphic design or presentation slide
DATA-DRIVEN MATERIAL MODELING
- Fig 52 Presentation slide or poster featuring Hybrid Living Materials.
"Project HYBRID LIVING MATERIALS"