

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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RAWAN ABDULLAH ABUZAID	:	Index No.
(P/K/A MODEL ROZ),	:	
Plaintiff,	:	<u>COMPLAINT</u>
	:	
-against-	:	
	:	
DANAH ALMAYOUF and DOES 1-10, inclusive,	:	
	:	
Defendants.	:	
	:	
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Plaintiff, Rawan Abdullah Abuzaid (P/K/A Model Roz) (“Model Roz” or “Plaintiff”), by her attorneys, Bailey Duquette P.C. and Lavelly & Singer P.C., for her Complaint against Defendants Danah Almayouf (“Defendant” or “Almayouf”) and Does 1 through 10, inclusive, alleges as follows:

NATURE OF THE ACTION

1. This action arises out of the malicious efforts of an overzealous social media activist, Defendant Almayouf, to launch a scorched earth, online campaign against Plaintiff Model Roz in an attempt to destroy her hard-earned career with vicious, defamatory and tortious attacks, solely because Plaintiff did not join Defendant’s anti-Saudi social media campaign.

2. Through this action, Model Roz seeks to: (a) put an end to Defendant’s egregious conduct, and (b) recover in excess of \$5 million for the damages Defendant has been, and is, causing, including harm to Model Roz’s reputation and standing in the community; Model Roz’s personal humiliation, mental anguish and suffering; and for specific damages – including approximately \$1,000,000 in campaign revenue to date, plus comparable lost revenue as a result of diminished exposure and lost projects – that Model Roz has lost as a result of Defendant’s wrongful conduct.

3. Model Roz is a leading Saudi Arabian model and social media personality who is now based in the United States. Through dedication and hard work, Model Roz has built a successful career, attracting millions of followers and fans worldwide, and signing modeling and influencer deals with some of the largest companies in the fashion industry.

4. Defendant, who also was born in Saudi Arabia, holds herself out as a photographer and social activist, and has taken a strong public stance (through her social media accounts) against Saudi Arabia, its government and people.

5. In one of the first social media posts in which she specifically called out Model Roz by name, presumably because Model Roz was a Saudi Arabian woman who had achieved significant worldwide popularity, Defendant identified Model Roz as being an example of someone who had escaped a repressive past in Saudi Arabia in order to achieve success in the United States. This was not true, however, and Model Roz found the post hurtful, given that her success had been due to, in large part, the support of her family and friends in Saudi Arabia. Model Roz did not want anyone to be misled by Defendant's false post about her, and disputed Defendant's mischaracterization of her past.

6. Defendant responded by targeting Model Roz with a campaign of personal attacks, which have increased in breadth and scope in the last year. Defendant has disparaged Model Roz's motives and invented stories about her, claiming that she is only out for money and that she had run away from her homeland, her family and religion. The gist of Defendant's attacks is that Model Roz is a "whore".

7. Defendant has used her social media accounts (including Instagram and Twitter) to falsely claim to her followers and others who read her posts – many of whom are also Model Roz's social media followers and the brands that compensate her for promoting their products – that

Plaintiff is a prostitute (and one who works out of the Saudi consultant for the Saudi Arabian government); a criminal; document forger; tax evader; racist and homophobe. These challenged statements are set forth *in haec verba* herein.

8. Defendant's challenged statements of and concerning Model Roz are defamatory *per se*.

9. Of course, Defendant's claims are baseless and false, but Defendant hasn't let that stop her from trying to ruin Model Roz's reputation and destroy her career. In addition to making defamatory statements about Model Roz, Defendant is further intentionally and maliciously interfering with the brands, followers and other economic opportunities that Plaintiff relies on to earn a living, including well-known name brands like Maybelline, Voss, Victoria Secret and Guess? Inc.

10. Maintaining a reputation as a person of high integrity and character has been, is, and will be fundamental to Model Roz's ability to maintain and advance her career. This is especially true because Model Roz works in industries – fashion and social influence – that are particularly sensitive to reputational risk and the collateral issues that arise when a personality's integrity and character are publicly put at issue.

11. While the brands with whom Model Roz has worked have experienced success with her by all metrics, many have ceased or diminished their relationship with Model Roz as result of Defendant's aggressive and repeated attacks.

12. Defendant has further caused specific harm to Model Roz by interfering with her relationship with the followers she relies on to earn a living.

13. Demonstrative of her malicious intent, Defendant has specifically stated she will make sure that Model Roz loses all of her clients in the United States; and claimed, when

questioned in social media as to the veracity of her statements concerning Model Roz, that she knows and has proof that those statements are true.

14. If this were not enough, on April 5, 2019 and then again on May 30, 2019, Model Roz, through her counsel, demanded that Defendant cease and desist from engaging in this wrongdoing. Demonstrative of her malicious intent, Defendant failed to do so – she instead responded to these letters by posting new defamatory statements and ratcheting up her campaign to harm Model Roz, which continues to this day.

15. Defendant's intentional and malicious behavior, through the worldwide reach of the internet, has now jeopardized Model Roz's good name and reputation on an international scale. Through this action, Model Roz: (a) asks the Court to put an end to Defendant's tortious acts, and (b) seeks defamation and tortious interference damages in excess of \$5,000,000.

THE PARTIES

16. Plaintiff is the embodiment of the American success story. A fashion model and social influencer, she is a citizen of Saudi Arabia and now a resident of Los Angeles, California. Plaintiff has print campaign, video, runway show and fashion advertisement experience, and is most recognized for her Snapchat account and model_roz Instagram account, which currently has more than 10 million followers.

17. Upon information and belief, Defendant Danah Almayouf was born in Saudi Arabia, and now resides and conducts business in New York.

18. Plaintiff is ignorant of the true names and capacities of Defendants sued herein as Does 1 through 10, inclusive, and therefore sues said Defendants by such fictitious names. Plaintiff will amend this Complaint to allege the true names and capacities of such fictitiously named Defendants when the same have been ascertained. Plaintiff is informed and believes, and based

thereon alleges, that each of the fictitiously named Defendants is responsible in some manner for the occurrences, acts and omissions alleged herein, and that her damages have been, and will be, proximately caused by their conduct. Among other things, Does 1 through 10 may be held directly liable for the defamatory postings by Defendant by virtue of having knowingly assisted Defendant in the publication of the false and defamatory statements; and/or having knowingly republished the false statements without having any reason to believe in their accuracy; and/or have tortiously interfered with Plaintiff's prospective economic advantage. For convenience, each allegation regarding Defendant shall apply to each of the Doe Defendants 1 through 10. Defendant and Doe Defendants 1 through 10 are sometimes hereinafter collectively referred to as "Defendants," as the context so indicates.

19. Plaintiff is informed and believes, and based thereon alleges, that Defendants, and each of them, were the agents, employees, partners, joint venturers, co-conspirators, owners, principals, and/or employers of the remaining Defendants, and each of them, are, and at all times herein mentioned were, acting within the course and scope of that agency, employment, partnership, conspiracy, ownership or joint venture. Plaintiff is further informed and believes, and based thereon alleges, that the acts and conduct alleged herein were known to, authorized and/or ratified by the officers, directors, and managing agents of Defendants, and each of them.

JURISDICTION AND VENUE

20. The Court has jurisdiction over Defendants pursuant to CPLR §§ 301 and 302.

21. Venue is proper in this County pursuant to CPLR §503(a) because, among other things, a substantial portion of the events giving rise to the claims herein occurred in this County.

THE FACTS

22. Defendant controls and operates a number of social media accounts, including, without limitation: a Twitter account (@dndnma); two Instagram accounts (.dndnma and @stopfakeryandhypocrisy); and a YouTube account (D-Vlogs) (collectively, the “Social Media Accounts”). She has gained a significant following, largely as a result of her pronouncements against what she perceives to be the Saudi Arabian government’s oppression of women.

23. Defendant, apparently angered that Plaintiff did not join in her activism against the Saudi Arabian government, has engaged in an intentional and malicious campaign of online defamation, interference and bullying designed to ruin Plaintiff’s reputation and cause significant harm to her.

24. Defendant’s defamation and tortious conduct includes the use of her Social Media Accounts to falsely portray Plaintiff as a **prostitute**, as the following statements¹, all of which concern the Plaintiff, demonstrate (the date of each respective statement is also provided):

- “It is not in [Plaintiff’s] best interest to go to court in the first place. She does a lot of illegal things, including her escorting business.” (April 8, 2019 on Defendant’s @dndnma Twitter account in response to a third party’s post about the cease and desist letter Defendant received from Plaintiff’s lawyer);
- “[H]ow can anyone with half a brain think I would be jealous of another human being who depends on prostitution to make a living? Especially while being involved with the whores of the Consulate.” (April 10, 2019);
- “Your look is disgusting due to the excessive number of plastic surgeries....Go and yell at the Consulate's sheep who renewed your passport and refused to renew those of other female citizens. Of course, **that's because of the special services you offer, trash.**” (April 15, 2019, as the administrator of the “stopfakeryandhypocrisy” Instagram account,

¹ Defendants published certain of their defamatory statements in Arabic. Accordingly, Plaintiff attaches as Exhibit A to this Complaint a true and correct translation of those statements from Arabic to English, along with a notarized Affidavit of the translator pursuant to CPLR 2101(b).

in response to a post by someone she believed to be Plaintiff) (emphasis added);

- "You expect us to be jealous of you while we know that all the riches you are enjoying are coming from prostitution?" (January 9, 2019);
- "I believe a person whose main occupation is being an escort for money should have no business getting involved in people's relationships." (on April 3, 2019, as the administrator of the "stopfakeryandhypocrisy" Instagram account, in response to a post about Roz giving relationship advice);
- "Of course, I do not wish to become an escort that the Dollars can buy." [Responding to a commenter saying "You will never become Roz"] (January 28, 2019, via her by.dndnma Instagram account);
- On July 11, 2019, in response to a third party commenting on Defendant's Instagram page that she will "never be like Model Roz," Defendant responded as follows (misspellings in original): "[Model Roz] stop coming over using fake accounts you sicko. I am telling you again I do not wish to become a whore [incomprehensible] for the Gulf, like you. It would not honor me to become like you, whether on Instagram, which is filled with your photoshopped pictures, and filters in addition to your failed cosmetic surgeries, or your real life that is **full of prostitution and disgusting matters**. You brought it on yourself, however, **I enjoy defaming you**. You [will] receive a strict reply from Victoria's Secret. You are a master at lying and manipulating people." (Emphasis added).

25. Defendant also has stated falsely on her Social Media Accounts to her tens of thousands of followers and other readers, as well as the brands that Plaintiff works with, that Plaintiff has committed crimes (in addition to prostitution), as the following statements, all of which concern the Plaintiff, demonstrate (the date of each respective statement is also provided):

- "You went ahead and forged official documents...." (April 8, 2019 on Defendant's @dndnma Twitter account in a rant of allegations directed to and about "model Roz").
- "You are breaking the law on many levels, including your Saudi bank accounts that you don't pay taxes on." (April 15, 2019).

26. Defendant also has stated falsely on her Social Media Accounts to her tens of thousands of followers and other readers, as well as the brands that Plaintiff works with, that Plaintiff is a racist and homophobe, as the following statements, all of which concern the Plaintiff, demonstrate (the date of each respective statement is also provided):

- “Hey @victoriasecret @vspink You are collabing with @model_roz which is a homophobe [sic] and racist who said gays are sick and bkack [sic] women are violent. Are you out of your Fing mind? We are boycotting you.” (July 10, 2019 as the administrator of the “stopfakeryandhypocrisy” Instagram account);
- “Saw this today! @guess you are fucking liars. You do not support lgbtq when you still collab with the homophob [sic] @model_roz.” (July 12, 2019 as the administrator of the “stopfakeryandhypocrisy” Instagram account).

27. Defendant has done everything in her power to harm Plaintiff, her professional reputation, her brand and client relationships and her ability to retain those brand and client relationships. Indeed, Defendant has gone out of her way to use her Social Media Accounts to reach out to Plaintiff’s brand and client relationships, as part of her effort to harm Plaintiff. For example:

- a. On December 20, 2018, Defendant published statements on her Twitter account, which she shared with the brand @swarovski, in which she wrote: “Hi @swarovski are you now working with @modelroz who made homophobic and racists [sic] comments and refused to apologize? This is the girl who shamed women who seek their right who [sic] runaway from abusive families. Check the thread above. I will make sure everyone see [sic] this #Swarovski...If your brand support [sic] a selfcentered person who refuse [sic] to apologize for the people she hurt. [sic] Then you’re sponsoring this hate speech. We will not buy your products. Shame on you @swarovski...Hey people #swarovski @swarovski is working with a fashionista

who said in her native language: black women are violent and aggressive, gays and lesbian [sic] are sick and referred to Asian faces as ugly. Also shames women [sic] right [sic] activists.” On the same day, following up on these posts, Defendant published the following statement: “People who say it’s personal it’s hate. Yes I hate hypocrite [sic], liars, and fakers. I hate who [sic] shame others and hate on minorities.”

- b. On April 14, 2019, in response to an Instagram post by clothing company Guess? that featured the Plaintiff and contained the caption, “Good vibes only”, Defendant published: (i) a statement on the Guess? account (which was shared by her on her stopfakeryandhypocrisy Instagram account) in which she wrote: “Good vibes? You mean racists vibes and homophobic vibes by posting a picture of this fake persona @modelroz;” and (ii) a statement on her stopfakeryandhypocrisy Instagram account, which she shared with @guess, in which she wrote: “Here is the homophobics lover again @guess posting with @model_roz.”
- c. On April 15, 2019, in response to a post by global online fashion brand prettylittlething (which has over 10 million followers) featuring Plaintiff, Defendant published a post on her stopfakeryandhypocrisy Instagram account – linking back to the prettylittlething post – in which she wrote: “So @prettylittlething decided to be racists homophobic little things by posting a picture of this racist homophobic creature @model_roz. She said gay and lesbian are sick. Black women are aggressive and violent and here you are collaborating with this trash? Seriously? [Then, in Arabic, she instructed her followers:

“Girls/boys, go visit their account and comment. Please do the best you can. This is their account. prettylittlething@”].

28. To date, Defendant has used the Social Media Accounts to send out hundreds of messages and posts concerning Plaintiff. Those statements are replete with libelous statements about Plaintiff, and further leave the false suggestion, impression and implication to her followers and readers that Plaintiff is a prostitute, criminal, racist and homophobe who engages in impropriety and should not be a social influencer or brand spokesman.

29. Defendant has also posted on her Social Media Accounts a video of Plaintiff that contains spliced, non-continuous, handpicked clips of Plaintiff that have been produced in a manner that is intended to leave the false suggestion, impression and implication to the viewer that Plaintiff is homophobic and racist.

30. Defendant has further posted videos on her Social Media Accounts to harm Plaintiff’s reputation and interfere with her brand and client relationships and her ability to retain those brand and client relationships.

31. By example only, on January 15, 2019, Defendant posted a video on her Instagram account, in which she stated, specifically concerning Model Roz:

Now you ae not only a racist homophone, you are also a liar and you accuse people of wrongdoings they have not committed. [Tarte? pronunciation not clear] is aware of the situation. The person who spoke to me on the phone - from the PR team - was shocked and she kept apologizing. I told her that I love their brand but I boycotted them since they collaborate with whoever and they deal with racists who promote hate speech. So, Guess, sorry, I mean [Tarte? pronunciation not clear], will take a stand. Hopefully, Guess does the same. Since racism and homophobic behaviors are a part of who you are, then work with Arab brands, or the Arabic branch of the brands. Stay away from American brands because you are a racist homophobe. This will not work in America, do you understand? We understand you have two personalities: one in English and the other is in Arabic. From this day forward, do not try to [do business] with Americans because now they know

you are racist and homophobic. From this outlet I am telling you: I hope you have better luck with the next opportunity.

32. Defendant's published statements concerning Plaintiff being "a prostitute"; Plaintiff engaging in criminal activity, including "forg[ing] official documents" and not "pay[ing] taxes"; and Plaintiff being a "racist" and "homophobe" are false. In truth, Plaintiff is not a prostitute. She has not forged official documents. She is not a racist or homophobe.

33. Defendant has acted with common law malice towards Plaintiff. She has ill will and spite towards Plaintiff because Plaintiff, a successful Saudi Arabian model and influencer respected and liked by millions throughout the world, has not joined in Plaintiff's efforts to criticize the Saudi Arabian government.

34. For example, as indisputable evidence of her motivation, on July 15, 2019, Defendant published the following statement on her stopfakeryandhypocrisy Instagram account: "Hey @tiktok so in women's international day you decided to invite @model_roz a woman 'from Saudi Arabia' where women are denied basic rights, enslaved by guardianship laws, jailed and tortured for being feminist, and kidnapped when seeking asylum. This person never used her platform to shed some light or bring awareness to help and empower these women. In fact, she shamed women who sought asylum and were brave enough to speak up in international media to pressure Saudi Arabia to stop oppressing women. And shamed women who are fighting the worst shape of Patriarchy which is in Saudi Arabia. She is fake she is a hypocrite she is disliked by so many Saudi women for being selfish and self centered. We as Saudi women want better representation stop insulting us." [Spelling and grammatical mistakes in original].

35. Defendant has also acted with actual malice towards Plaintiff, in that she has published her challenged statements with knowledge that they were false or with reckless disregard of whether they were false or not.

36. In this regard, Defendant's response to Plaintiff's April 5, 2019 cease-and-desist letter is dispositive evidence of both Defendant's intent to harm Plaintiff and Defendant's reckless disregard of the truth (i.e., actual and common law malice).

37. Specifically, on April 8, 2019, after receiving that letter, Defendant published a post on the "stopfakeryandhypocrisy" Instagram account that was directed to and about "model Roz" in response to the cease-and-desist letter by stating to the Plaintiff: "Behave yourself or I will hurt you!...Nobody wants to be fake, making a living from prostitution!...you know how rotten you are."

38. Defendant's statements against Plaintiff – as detailed in this Complaint – are defamatory *per se* in that they tend to injure Plaintiff in her trade, business or profession, and accuse her of criminal activity and of sexual misconduct.

39. Defendant's false statements were published, in that they were communicated in writing to the followers and/or recipients of her posts on her Social Media Accounts.

40. The readers and listeners of Defendant's Social Media Accounts have further disseminated Defendant's defamatory statements, often by repeating the very same untruthful and defamatory statements made by the Defendant. This has been especially damaging since it has exposed more of Plaintiff's followers, brands and potential customers and followers to the defamatory statements.

41. As a consequence of Defendant's false statements, Plaintiff has suffered general damages, including but not limited to damage to her reputation and standing in the community, as well as personal humiliation, mental anguish and suffering.

42. Prior to the commencement of Defendant's egregious acts, Plaintiff maintained an extremely positive reputation and was sought after by brands and social followers.

43. For example, Model Roz had actual and/or potential modeling and/or social media influencer campaigns with international brands such as Revlon, L'Oreal, Voss, Victoria Secret, Swarovski, and Guess, Inc.

44. As detailed in this Complaint, Defendant's publication of defamatory statements of and concerning Plaintiff, and her efforts to interfere with Plaintiff's relationship with followers, brands and potential customers are intended to destroy Plaintiff's reputation and therefore her career.

45. As a consequence of Defendant's false statements and related actions on her Social Media Accounts, Plaintiff has suffered specific damages, including but not limited to damages resulting from lost economic opportunities, including lost opportunities with brands, clients, potential brands and followers.

46. Among other things, certain brands that previously were affiliated with Plaintiff have ceased or diminished their relationship with her as result of Plaintiff conduct, and other brands will not do business with her. In sum, Plaintiff has lost approximately \$1,000,000 in campaign revenue to date, plus comparable lost revenue as a result of diminished exposure and lost projects.

FIRST CAUSE OF ACTION

(Defamation *Per Se* By Libel)

47. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs, as if separately set forth herein.

48. Defendants have published, and caused to be published, false and damaging statements of and concerning Plaintiff, as set forth with specificity in Paragraphs 24, 25, 26, 27 and 37 of this Complaint, above, on her Social Media Accounts.

49. Defendants' libel is permanent and can never be undone.

50. The statements against Plaintiff are defamatory *per se* in that they tend to injure Plaintiff in her trade, business or profession and accuse her of criminal activity and sexual misconduct.

51. Defendants acted with ill will and spite (common-law malice) towards Plaintiff in an effort to destroy Plaintiff's reputation as a model and social influencer. In this regard, Defendant Almayouf expressly stated: (a) "I enjoy defaming [Plaintiff]"; (b) "I hate Roz"; and (c) "I will hurt [Plaintiff]"; and specifically instructed her followers to go to the websites of the companies that have relationships with Plaintiff and attempt to interfere with those relationships.

52. Before publishing her libel, Defendants knew, or should have known, that their statements concerning Plaintiff were false and misleading, and therefore was reckless as to the truth of the statements. Thus, Defendants acted with actual malice in publishing their defamatory statements about Plaintiff, to wit, with reckless disregard of the truth.

53. The conduct of the Defendants is causing and, unless enjoined and restrained by this Court, will continue to cause the Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. The Plaintiff has no adequate remedy at law. The Plaintiff is entitled to injunctive relief prohibiting the Defendants from engaging in further defamation. This injunctive relief is not adverse to the public interest.

54. As a consequence of Defendants' publication of their libel (as set forth in this Complaint), Plaintiff has also suffered economic injury, and continues to suffer damage, including but not limited to damage to her reputation.

55. By reason of the foregoing, Defendants are liable to Plaintiff for general, actual, compensatory, special and punitive damages.

SECOND CAUSE OF ACTION

(Defamation *Per Se* By Slander)

56. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs, as if separately set forth herein.

57. Defendants published, and caused to be published, false and damaging statements of and concerning Plaintiff. Defendants published their slander during a video on January 15, 2019 and thereafter in a message to Guess? and Tarte on Instagram, and thereafter through the other Social Media Accounts. Their slander is permanent and can never be undone.

58. The slanderous statements made during the January 15, 2019 video, and thereafter, include the statements set forth in Paragraph 31 of this Complaint, above.

59. The statements against Plaintiff are defamatory *per se* in that they tend to injure Plaintiff in her trade, business or profession and accuse her of criminal activity and sexual misconduct.

60. Defendants acted with ill will and spite (common-law malice) towards Plaintiff in an effort to destroy Plaintiff's reputation as a model and social influencer. In this regard, Defendant Almayouf expressly stated: (a) "I enjoy defaming [Plaintiff]"; (b) "I hate Roz"; and (c) "I will hurt [Plaintiff]"; and specifically instructed her followers to go to the websites of the companies that have relationships with Plaintiff and attempt to interfere with those relationships.

61. Before publishing the slanderous statements on YouTube, Defendants knew, or should have known, that their statements concerning Plaintiff were false and misleading, and therefore was reckless as to the truth of the statements. Thus, Defendants acted with actual malice in publishing the YouTube video statements, to wit, this reckless disregard of the truth.

62. The conduct of the Defendants is causing and, unless enjoined and restrained by this Court, will continue to cause the Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. The Plaintiff has no adequate remedy at law. The Plaintiff is entitled to injunctive relief prohibiting the Defendants from engaging in further defamation. This injunctive relief is not adverse to public interest.

63. As a consequence of the publication of Defendants' slander, Plaintiff has also suffered economic injury, and continues to suffer damages, including but not limited to damages to her reputation.

64. By reason of the foregoing, Defendants are liable to Plaintiff for general, actual, compensatory, special and punitive damages.

THIRD CAUSE OF ACTION

(Tortious Interference with Prospective Economic Advantage)

65. Plaintiff repeats and realleges the allegations contained in the preceding paragraphs, as if separately set forth herein.

66. Out of spite, malice, or ill will, Defendants have interfered, and sought to interfere, with Plaintiff's business relationships with her brands, potential brands and followers, i.e., the clients and marketplace through which Plaintiff earns her living.

67. Defendants' interference with Plaintiff's relationship with brands, potential brands and followers was – as Defendant admits – intended to destroy Plaintiff's reputation as a model and social media influencer.

68. Indeed, Defendants have, among other things, intentionally and falsely portrayed Plaintiff as a prostitute, criminal, forger, tax cheat, racist and homophobe.

69. Since June 2017, Defendants have intentionally sought out and communicated with Plaintiff's followers and brands in an effort to convince them to not follow and/or work with Plaintiff.

70. As a direct result of Defendants' interference with Plaintiff's business relationships as a model and social influencer, including with Plaintiff's brands, potential brands and followers, Plaintiff has been harmed. Specifically, and as set forth in this Complaint, Plaintiff has lost followers and certain brands have ceased, limited, or will not, do business with Plaintiff. Indeed, Plaintiff has lost approximately \$1,000,000 in campaign revenue to date, plus comparable lost revenue as a result of diminished exposure and lost projects.

71. The conduct of the Defendants is causing and, unless enjoined and restrained by this Court, will continue to cause the Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. The Plaintiff has no adequate remedy at law. The Plaintiff is entitled to injunctive relief prohibiting the Defendants from engaging in further tortious interference. This injunctive relief is not adverse to the public interest.

72. Defendants are also liable to Plaintiff for the monetary damages that Plaintiff has incurred, and continues to incur, as a direct and proximate result of Defendants' tortious interference.

RELIEF REQUESTED

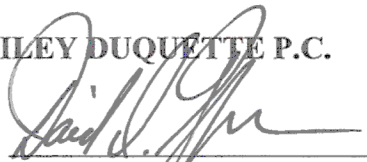
WHEREFORE, by reason of the foregoing, Plaintiff respectfully requests that this Court enter judgment as follows:

- (1) That Defendants, and all persons and entities acting for, with, by, through or under them, be permanently enjoined and restrained from further libel, slander or tortious interference against Plaintiff on the Social Media Accounts; and be further ordered and

- directed to remove or delete all disparaging and harmful statements regarding Plaintiff thereupon, as well as on any other platform;
- (2) on the First and Second Causes of Action, general, actual, compensatory, special and punitive damages, in an amount to be determined at trial, but not less than \$5 million;
- (3) on the Third Cause of Action, compensatory and punitive damages in an amount to be determined at trial, but not less than \$5 million; and
- (4) that this Court order whatever other and further relief for Plaintiff as the Court may deem just and proper.

Dated: New York, New York
August 9, 2019

BAILEY DUQUETTE P.C.

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