

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

**TRISTAN TATE, an individual and
ANDREW TATE, an individual**

Plaintiffs,

v.

**JOHN DOE a/k/a @CrayonMurders,
et al.,**

Defendants,

**CASE NO.
DIV.**

Complaint for damages exceeding \$50,000.00 for defamation, defamation per se, commercial defamation, and civil conspiracy.

COMPLAINT

Plaintiffs, TRISTAN TATE and ANDREW TATE (“Plaintiffs”) sues Defendant, JOHN DOE a/k/a @CrayonMurders, an individual, JANE DOE a/k/a @Therealsuzywyn1, an individual, MARY DOE a/k/a @Avalon1T, an individual, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, an individual, JUNE DOE a/k/a @Mad_About_Sheep, an individual, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, an individual, ANNE DOE a/k/a @THOTSANDPLAYERS, an individual, ROSE DOE a/k/a @frmthebroknside, an individual, EMILY DOE a/k/a @usamabroad, an individual, Matthew Jury (“Mr. Jury”), Eleanor K. Gaetan (“Gaetan”), M&M DOE a/k/a @mireillemantee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot (collectively “Defendants”), and would show unto the court as follows:

PARTIES

1. Plaintiffs, Tristan Tate and Andrew Tate, are businessmen who have been residing in Romania for the past ten (10) years. Thus, Plaintiffs are considered “stateless” for purposes of Federal Removal Jurisdiction.
2. Defendant, **JANE DOE a/k/a @Therealsuzywyn1**¹ (“Suzanne Wynter”), on information and belief is a resident of Palm Beach County, Florida, is an adult over the age of 18, and is otherwise *sui juris*.
3. Defendant, **MARY DOE a/k/a @Avalon1T**² (“Avalon”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida.
4. Defendant, **JOHN DOE a/k/a @CrayonMurders**³ (“Murdered by Crayons”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
5. Defendant, **NATHAN LIVINGSTON a/k/a @MILKBARTV**⁴ (“MilkBar”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.

¹ A true and correct copy of the defamatory comments have been attached hereto as Exhibit A.

² A true and correct copy of the defamatory comments have been attached hereto as Exhibit B.

³ A true and correct copy of the defamatory comments have been attached hereto as Exhibit C.

⁴ A true and correct copy of the defamatory comments have been attached hereto as Exhibit D.

6. Defendant, **JUNE DOE a/k/a @Mad_About_Sheep**⁵ (“Sheep”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
7. Defendant, **JACK DOE a/k/a @Gadget44027447**⁶ (“Gadget”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
8. Defendant, **JAMES DOE a/k/a @C_S_SKEPTIC**⁷ (“Skeptic”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
9. Defendant, **ANNE DOE a/k/a @THOTSANDPLAYERS**⁸ (“Players”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
10. Defendant, **ROSE DOE a/k/a @frmthebroknside**⁹ (“JustMe”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.

⁵ A true and correct copy of the defamatory comments have been attached hereto as Exhibit E.

⁶ A true and correct copy of the defamatory comments have been attached hereto as Exhibit F.

⁷ A true and correct copy of the defamatory comments have been attached hereto as Exhibit G.

⁸ A true and correct copy of the defamatory comments have been attached hereto as Exhibit H.

⁹ A true and correct copy of the defamatory comments have been attached hereto as Exhibit I.

11. Defendant, **EMILY DOE a/k/a @usamabroad**¹⁰ (“Sharon 36”), on information and belief, is a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
12. Defendant, **Matthew Jury**¹¹, on information and belief, is a resident of the United Kingdom, that has directed communications and social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida and is an adult over the age of 18 and otherwise *sui juris*.
13. Defendant, **Eleanor K. Gaetan** (“Gaetan”), on information and belief, is a resident of the State of Virginia, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
14. Defendant, **M&M DOE a/k/a @mireillemannee**¹² (“Brown”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
15. Defendant, **Zachary Bonfilio a/k/a @misfitpatriot** (“Brown”), on information and belief, is a resident of the State of Texas, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.

¹⁰ A true and correct copy of the defamatory comments have been attached hereto as Exhibit J.

¹¹ A true and correct copy of the defamatory comments have been attached hereto as Exhibit K.

¹² A true and correct copy of the defamatory comments have been attached hereto as Exhibit L.

16. Defendant, **LUCY BROWN a/k/a @lucymarionbrown**¹³ (“Brown”), on information and belief, is not a resident of the State of Florida, that has directed social media postings into the state of Florida, specifically to influence public opinion regarding a case filed by Plaintiffs in Palm Beach County, Florida, and is an adult over the age of 18 and otherwise *sui juris*.
17. A majority of the Defendants appear to the public anonymously through various social media accounts, which is premediated, in an attempt to shield their liability and avoid the consequences of their conspiratorial plot to defame and harm the Plaintiffs.

JURISDICTION AND VENUE

18. This is a Complaint for damages exceeding \$50,000.00 for defamation, defamation per se, commercial defamation, and civil conspiracy.
19. This Court has personal jurisdiction over the Defendants and venue is appropriate in this Court, as substantially all the events relating to the causes of action herein occurred in Palm Beach County, Florida or within the State of Florida, or were directed to such venue.
20. Defendants directed the false statements into the State of Florida in a concerted and conspiratorial effort to influence the public opinion regarding a case filed by Plaintiffs in Palm Beach County, as well as ongoing cases in Romania and England. The conspirators call themselves “Team Matrix.”
21. The defamatory statements made by the Defendants were accessed within the State of Florida.
22. One or more Defendants are physically located in the State of Florida.
23. Under Florida’s Longarm Statute, § 48.193, jurisdiction is proper based on the conspiracy between the Defendants, as well as the defamatory postings that were accessed within the

¹³ A true and correct copy of the defamatory comments have been attached hereto as Exhibit M.

State of Florida and directed to the State of Florida to influence public opinion regarding another defamation case filed, in Palm Beach County, Florida, by the Plaintiffs.

24. All Defendants had direct knowledge of the pending litigation in Palm Beach County, Florida (“Florida Case”) and directly and publicly spoke about the case, including making defamatory statements about the Plaintiffs and their legal counsel in the Florida Case.

STATEMENT OF FACTS

The Tate Brothers

25. Andrew Tate, 37 (“A. Tate”), and Tristan Tate, 35 (“T. Tate”) (collectively, “the Tate Brothers”) are British-American brothers who are entrepreneurs, major social media influencers, and international businessmen that have resided in Romania for the last approximately ten (10) years.
26. The Tate Brothers’ international presence can be attributed to their values and life experiences, which began in their youth. They were frequently on the move from a young age, living in both the United States and the United Kingdom.
27. Andrew Tate is a world-champion kickboxer, social media influencer, investor, international businessman—and, most importantly, a father.
28. Tristan Tate is a European champion kickboxer, social media influencer, investor, international businessman—and, most importantly, a father.
29. Alongside their distinct personal and business identities, the Tate Brothers also share a collective business identity and reputation that includes both Andrew Tate and Tristan Tate.
30. The Tate Brothers consult, advise, and generate income from various business ventures, with revenues estimated in the hundreds of millions of dollars. They are respected thought leaders, business moguls, and motivational speakers in multiple industries. Highly successful

businessmen, investors, and individuals seeking upward mobility and financial independence invest in the Tate Brothers, as they provide access to extensive international investment, business, and influencer markets.

31. The Tate Brothers' capacity to work, provide advice, generate income, influence, market, secure new business, and maintain and develop existing business relationships hinges on their reputation, ability to bank, travel, and actively participate in the international marketplace.
32. Their use of social media and travel is a distinguishing factor in their success.
33. Unfortunately, their following, previously amassed across Twitter, Instagram, Facebook, and YouTube, was wiped out due to the spurious false accusations underpinning the allegations in this complaint.
34. The Tate Brothers are wise investors who have increased their wealth through access to exclusive opportunities, which is directly related to their reputation as respected, influential businessmen among a community of elite investors.
35. They previously owned many asset classes, including dozens of high-end luxury vehicles, cash, real property, and jewelry seized for being wrongfully accused of crimes they did not commit.
36. However seemingly unrelated, the common philosophy uniting all the Tate Brothers' businesses is a goal towards self-improvement in every aspect of life.

The Tate Brothers in Romania

37. Compared to Western Europe and the United States, Romania has long been known to be a traditional country with a rich cultural history, traditions, and Christian values, complying with the Tate Brothers' convictions and worldview.

38. Because of this, beginning in or about 2015, the Tate Brothers became full-time residents of Romania.
39. The Tate Brothers first garnered press attention in 2008. Before becoming celebrity entrepreneurs, the Tate Brothers separately distinguished themselves in successful careers as professional kickboxers: A. Tate won multiple World Titles, and T. Tate won numerous European Championships.
40. Subsequently, T. Tate became a successful sports commentator and appeared on a British reality TV Show called *Shipwrecked Island* in 2011 and in 2016, Andrew Tate appeared on a different British reality TV show called *Big Brother*.
41. Their prominence has significantly increased due to viral internet clips from the summer of 2022. Their celebrity, however, is limited in geography and audience – to primarily young – traditional-leaning men.
42. The Tate Brothers began to be involved in various businesses early on. Kickboxing, reality television, modeling, and sports commentating are some industries that have progressed.
43. Since then, the Tate Brothers have given friendly advice regarding how to succeed to aspiring fighters, models, and social media influencers. Advice given in these situations is always in the spirit of helping someone better their lives, absent judgment or condemnation — always considering the sacrifices the Brothers made to achieve success.
44. The Tate Brothers are compassionate and empathetic people, especially to those who are less fortunate than them.
45. Their generosity is evidenced by the fact that they regularly let friends use their luxuries, often permitting them to freely enter and exit their multimillion-dollar homes, use their

luxury vehicles, attend elegant gatherings, and lodge at their Romanian estate, even when the Tate Brothers were abroad for extended periods.

46. Unfortunately, their altruism has made them targets for extortion by bad-faith actors, who have exploited their generosity for selfish and sometimes even criminal reasons.
47. Due to their wealth, notoriety, and perceived vulnerability to wrongdoers, the Tate Brothers employ around two dozen armed guards, mainly former Romanian police officers who are fully licensed to carry firearms for the protection of their estate.
48. Because of security protocols and turnover, the guards usually do not interact directly with the Tate Brothers. Communications between the Tate Brothers and the security guards are managed through a single point of contact, who directs security to verify visitors' identities and open the gate for anyone exiting the property.
49. All guests who enter the Tate estate can freely and quickly leave at any time. Surveillance footage and witnesses who regularly frequent the estate corroborate this fact.
50. Mary Doe and Jane Doe (Court assigned pseudonyms, in an abundance of caution, from *Tate, et al v. John Doe, et al.*) are two women who were invited to become regular visitors at the Tate Estate and then maliciously accused the Tate Brothers of horrible crimes.
51. Mary Doe and Jane Doe's stories are false and contradicted by strong evidence and witness accounts. For instance, publicly available video footage from the Tate estate shows Mary Doe and Jane Doe, along with many others, freely entering and leaving the premises at their leisure.
52. Moreover, Iasmina Pencov ("I. Pencov"), a woman who hung out, partied with, and lodged with Mary Doe and Jane Doe during that time, testified in a sworn statement that she

(Pencov), Mary Doe, and Jane Doe were all able to enter and exit the Tate Brothers residence without issue.

53. I. Pencov also stated they could do the same at a second house, where she and Jane Doe lodged briefly.

54. Notably, I. Pencov and others have publicly testified that Andrew and Tristan Tate are innocent of human trafficking or any other crime. I. Pencov has also indicated that she has a background in psychology and, therefore, would understand if she was being psychologically manipulated.

55. Further, I. Pencov has sworn that she is a victim of Jane Doe, Mary Doe, and that the Romanian Government capriciously violated her rights and the Tate Brothers' rights. I. Pencov has also filed a lawsuit against Jane Doe and Mary Doe for the harm they have perpetrated upon her.

56. Lastly, another woman living with I. Pencov, named Beatrice Anghel, has indicated in a sworn statement that she is also a victim of Jane Doe, Mary Doe, and the improper weaponization of the Romanian Government, much in the same fashion as I. Pencov.

The Conspiratorial Plot to Defame

57. On April 13, 2024, Players hosted a "Space" on X titled "Exposing @VPNLFN 'Ben,'" (the "April 2024 Space") where several co-conspirators discussed the depths of their ongoing conspiracy to intentionally, recklessly, and maliciously defame the Tate Brothers.

58. In the April 2024 Space, several contributors admitted to having formed a group to maliciously defame the Tate Brothers and turn public opinion against them.

59. This "group" primarily includes the Defendants in this case, whom they refer to as "Team Matrix."

60. One of the members of Players can be quoted as saying, “We formed Team Matrix in 2023.”
61. During the April 2024 Space, it was said that Matthew Jury, an attorney and partner at McCue Jury & Partners, in the United Kingdom, directly emailed and communicated with members of Team Matrix, apparently providing them with informal guidance and support for their social media defamation campaign.
62. Mr. Jury’s informal guidance and support involves communicating with Team Matrix members in Florida.
63. Thus, Mr. Jury has directly transmitted defamatory information into the State of Florida, committed a tortious act within the State of Florida, and the communication is not within the scope of any attorney-client privilege or other privilege.
64. Specifically, during the April 2024 Space, a member of Team Matrix, “JustMe,” indicated that she was in direct (private) contact with Matthew Jury. Mr. Jury has also appeared on X (f/k/a Twitter) Spaces with prominent members of Team Matrix.
65. In a recent interview with a member of Team Matrix, Mr. Jury stated: “They’re incredibly important... But there’s this tiny group, they call themselves Team Matrix... But quite often, I’ll get little tips from them, what’s going on.”^{14, 15}
66. Mr. Jury is also currently involved in a crowdfunding campaign to fund additional allegations against Plaintiffs containing what appear to be false allegations of sexual abuse.¹⁶

¹⁴ Mr. Jury himself admits to the direct contact with members of Team Matrix. In the same interview, Mr. Jury accuses the Tates of gaslighting because they are denying that they are guilty of any crime and that there are no victims. Mr. Jury then indicates that this behavior is “traumatizing” to the victim. This statement affirmatively indicates that there are in fact victims and crimes committed by the Plaintiffs, which is a defamatory statement. See video at the following link:

https://drive.google.com/file/d/11Y3ofJZ5YKeJ15-ik6X8Qluoz01nnEX/view?usp=drive_link

¹⁵ Mr. Jury also acknowledged that putting Tate on a social media channel will get clicks (and money), which is exactly what he, NCOSE (and their attorneys), and Team Matrix do when defaming the Tate Brothers. See video clip at the following link:

https://drive.google.com/file/d/1CqmH3e5-P--5PVG6MHhMVTjGWANJ-XA1/view?usp=drive_link

¹⁶ These claims appear to be several years old and well past the civil statute of limitations.

67. Members of Team Matrix often share the crowdfunding link in a blatant attempt to fund their defamatory social media carnival and false claims against the Tate Brothers in the United Kingdom, Romania, and the United States.
68. Members of Team Matrix, especially Lucy Brown, JustMe, and Murdered by Crayons, regularly ask people to donate to the crowdfunding link during Spaces.
69. On or about February 10, 2025, Lucy Brown posted a web domain, “andrewtateisarapist.com.” When the link is clicked, it takes the user to Matthew Jury's and his law firm's crowdfunding page that they allegedly use to pay for litigation against the Plaintiffs.
70. Mr. Jury has not corrected this link to the crowdfund, even though he interacts with these accounts regularly.¹⁷
71. Furthermore, Mr. Jury's crowdfund is replete with defamatory allegations, such as this statement:
- “Tate is on bail and allowed to travel freely within Romania. It would be easy for him to smuggle himself across the border. Indeed, several high-profile suspects have fled Romania this way before they can be convicted. There is evidence that Tate plans to flee Romania before his trial starts. Should he flee, it is feared his influence will only grow, and he may go on to commit further crimes against women and others.”¹⁸
72. Recently, in October 2024, Mr. Jury maliciously and recklessly posted more defamatory statements all over social media, which indicated that Andrew Tate “beat a woman with a belt in a video and he was kicked off U.K. Big Brother.”

¹⁷ Mr. Jury regularly incites these types of defamatory comments by making public statements, such as the statement contained in the following link, when he aggressively gaslighted in response to a question. *See* video of Mr. Jury at a Romanian press conference:

https://drive.google.com/file/d/1KvBYmrPeY9C_-pYaGRFuV_NZ5R-eguR5/view?usp=drive_link

¹⁸ A true and correct copy of several defamatory postings from the X account of Mr. Jury have been attached hereto as Exhibit K.

73. However, Andrew Tate and the woman have both publicly, in a video circulated all over social media (one of which Mr. Jury has complete knowledge), said they were acting and playing around—categorically denying that there was an actual assault or beating involved.
74. However, Mr. Jury ignores facts that are harmful to his agenda and do not support his self-interested cause.
75. Mr. Jury's cause appears to already be providing himself and his law firm with increased publicity, income, and potentially a larger windfall from the allegedly false civil allegations levied by his clients against Andrew Tate. Thus, Mr. Jury and his conspirators have further motivation to continue defaming the Tate Brothers.
76. In short, like many individuals involved in defaming the Tate Brothers, Mr. Jury and his firm are exploiting the false allegations against the Tate Brothers for financial gain and notoriety.
77. One of Mr. Jury's latest attempts to harm the Tate Brothers, and now their legal team, includes accusing one of the Tate attorneys in the United States of professional misconduct by making a frivolous and desperate bar complaint.
78. This frivolous bar complaint was sanctioned by his entire law firm, which is evidenced by the email receipt from the bar association copying additional associates of the firm.
79. The complaint is not only frivolous, but likely defamatory.¹⁹ The complaint goes past opinions and requests for an investigation.

¹⁹ Mr. Jury regularly and publicly accuses Tate attorneys of breaking the law, which are baseless claims and defamatory in nature against the legal professionals representing the Tate Brothers. For instance, Mr. Jury accused the U.S. attorneys of appearing to have fabricated text messages. This is categorically a falsehood and better suited for Mr. Jury's fantasy world, where "victims" are allowed to fabricate evidence and crimes against a person and have no repercussions. Repercussions such as a lawsuit filed against them—attached hereto as Exhibit M, which he calls "witness intimidation."

80. Mr. Jury made the bar complaint even though multiple Florida courts had already ruled that the Tate attorneys had the right to publicly speak about the case and defend their clients' reputations in the court of public opinion.²⁰
81. In the United States, it is well within an attorney's right to defend a client's reputation publicly, especially after Team Matrix's and Mr. Jury's "smear" campaign.
82. In the seminal decision, *Gentile v. State Bar of Nevada*, the United States Supreme Court held: "An attorney's duties do not begin inside the courtroom door. He or she cannot ignore the practical implications of a legal proceeding for the client. Just as an attorney may recommend a plea bargain or civil settlement to avoid the adverse consequences of a possible loss after trial, so too an attorney may take reasonable steps to defend a client's reputation... especially in the face of a prosecution deemed unjust or commenced with improper motives." 501 U.S. 1030 (1991).
83. Mr. Jury disagrees with the facts presented by the Plaintiffs in the U.S., Romanian, and the U.K. cases. Consequently, he filed a bar complaint that contradicted Florida court rulings and long established case law.
84. Under Mr. Jury's approach and assault on freedom of speech, any attorney who publicly disagrees with or contradicts his "theory" of each case is guilty of attorney misconduct.
85. Mr. Jury is simply weaponizing the justice system and regulatory authorities in the United States, in pure desperation, to silence the truth from being told publicly about the ongoing cases involving the Tate Brothers.
86. However, over several months, Mr. Jury has been directly contacting one of the Plaintiffs, Andrew Tate, on social media, which appears to be in contravention of the Solicitors Regulation Authority ("SRA") Standards and Regulations.

²⁰ A true and correct copy of the court opinions have been attached hereto as Exhibit N.

87. Mr. Jury regularly “tags” Andrew Tate in harassing public postings on X, which directs a notification to Andrew Tate's account.
88. This type of cyberstalking often includes false statements, hateful speech, and abusive statements meant to be read by a represented client.²¹
89. Thus, Mr. Jury has directed contact to a client he knows is represented in at least three countries, by way of social media.
90. Upon information and belief, Mr. Jury is using this direct client contact to pressure a lucrative settlement on behalf of his clients, levying what appear to be false claims against Andrew Tate.²²
91. The Crown Prosecution Service had previously declined to criminally prosecute his clients’ allegations.
92. In addition to making frivolous bar complaints and working with Team Matrix, Mr. Jury works closely with the National Center on Sexual Exploitation (“NCOSE”) and other U.S. based attorneys.
93. Representatives for the firms even traveled to and held a “joint press conference” in Romania.²³

²¹ Mr. Jury has mocked being blocked by the Plaintiffs on social media to avoid his harassing contact. Mr. Jury indicated that he would create a “ghost” or fake account to continue the unwanted contact by a represented client and continue his cyberstalking. *See* a true and correct copy of Mr. Jury’s social media posting attached hereto as Exhibit K.

²² *See* discussion of Mr. Jury, with Mr. Murdered by Crayons, comparing compensation for his clients to that of a person involved in a car accident (putting aside car accident cases are usually taken on contingency and not crowd-funded). Mr. Jury goes as far as to attack those publicly speaking about the financial motivations of his clients, as needing to “get a grip” to suggest that their point of view is invalid and not based in reality:

https://drive.google.com/file/d/1yj6EIJf2NUnyTsq0cl36L-siQVjTO-9/view?usp=drive_link

²³ Mr. Jury included the crowd funding link at the bottom of a press release, which appears to have the letterhead of McCue Jury & Partners, NCOSE, and Laffey Bucci Dent (the former law firm of Ms. Roth).

94. The press conference was a malicious attempt to influence the Romanian prosecution of the Tate Brothers and viciously defame the Plaintiffs to prop up their defamatory agenda and positions in the civil cases, while appearing to concurrently solicit additional clients.^{24, 25}
95. Mr. Jury gives himself the right to go on a world tour, to the epicenter of the false allegations against the Tate Brothers, in an obvious attempt to manipulate the criminal proceedings in Romania and civil proceedings in Florida; however, subsequently, Mr. Jury hypocritically made a bar complaint against the attorney publicly defending against the very defamation Mr. Jury recklessly continues to spew all over social media channels.²⁶
96. Team Matrix has often shared the joint press releases and conferences from Romania, and has regularly promoted crowdfunding for Matthew Jury and his law firm.²⁷
97. In support of Team Matrix, Mr. Jury, and a public smear campaign against the Plaintiffs, attorneys from NCOSE and attorney Julian Roth have made several contradictory and false public statements.²⁸
98. For example, when Matthew Jury and other representatives from McCue Jury & Partners traveled to Romania, in October 2023, Julian Roth made the following statement:

“As far as our case, our representation as of today includes a woman residing in the United Kingdom and an American citizen. And they are victims, and I won't say alleged, because the federal judge in the United States, in her opinion, herself, upon review of the evidence submitted, called the women victims.”²⁹

²⁴ Ms. Roth indicated it did not matter what the [alleged] victim had to say, they would believe the person as long as there were crimes alleged against men like the Plaintiffs. Obviously, as stated, this includes if a client or potential client is blatantly lying about an alleged crime against the Plaintiffs. See video at the following link: https://drive.google.com/file/d/19WX5JVJnMqLB0-N7tuz82e9omaLwtgOp/view?usp=drive_link

²⁵ Ms. Pinter and NCOSE have posted on X soliciting additional clients to come forward against Andrew Tate specifically. The posting stated, “Are you a victim of Andrew Tate.”

²⁶ While in Romania, Mr. Jury apparently thought it appropriate to serve papers to the home of Plaintiffs, with a press and media entourage in tow. He then thought it was appropriate to post the spectacle on social media. See a true and correct copy of the posting by Mr. Jury attached hereto as Exhibit O.

²⁷ NCOSE is frantically posting donation links, utilizing the name of Andrew Tate to garner more donations.

²⁸ At the time of the press conference, Ms. Roth was an attorney for one of the alleged false accusers.

²⁹ See https://drive.google.com/file/d/10-Sna5_UQ8hg54g7WQz3WhKR_Juac_fV/view

99. The statement was categorically a falsehood. In reality, the Federal Judge clearly referred to the false accusers as “alleged victims” in the order, which was apparently ignored by Ms. Roth.³⁰

100. During the same press conference, Ms. Roth then maliciously threatened anyone that came to the aid of the Plaintiffs to provide a defense or remedy.³¹

101. Ms. Roth doubled-down and indicated that the persons holding the press conference would seek to hold attorneys accountable for providing a defense for the Tate Brothers and also for availing themselves to available remedies under the law, including a civil lawsuit for defamation.³²

102. As her basis for making this threat, Ms. Roth indicated that Plaintiffs’ lawsuit has “no basis in law, none whatsoever.”³³

103. However, if there was a scienter of truth to the prior statement, the several motions to dismiss the Plaintiffs’ case would not have been overcome. The only reason Ms. Roth’s client, Mary Doe, was able to avoid responsibility in the lawsuit was due to jurisdictional issues, not the substance of the allegations.

104. Ms. Roth, then went on to say in the press conference:

“We represent Mary Doe and Jane Doe and other individuals in the American Courts... I encourage you to read the recent Federal Court opinion from the United States, wherein a judge ordered that the women and the other named parties in the lawsuit are not to be called by their real names. And I emphasize this to everyone in the room because if you publish the names of our clients in any media, you are violating a court’s order.”³⁴

³⁰ See excerpt of order attached hereto as Exhibit P.

³¹ See video clip of Ms. Roth stating that anyone providing a defense for the Plaintiffs would be “held accountable.”

³² See the video at the following link:

https://drive.google.com/file/d/1sAgFl9Wm2KB-_5JXeHlMhAMHv60mvnPI/view?usp=drive_link

³³ See Ms. Roth stating this prior to the lawsuit overcoming several motions to dismiss:

³⁴ See <https://drive.google.com/file/d/1I6GgZCc4eemzDo7lCbWC2y1oWapIt5JI/view>

105. This was a disingenuous interpretation of the Federal Judge's order, which only limited the use of pseudonyms to proceedings before the court. Upon information and belief, this was an attempt by Ms. Roth, and those appearing with her, to manipulate the Romanian media.³⁵
106. The United States District Court Judge did not limit the use of the alleged victims' names to the entire world, as bizarrely represented by Ms. Roth.³⁶
107. However, that did not stop Ms. Roth, NCOSE, Matthew Jury, and Team Matrix from repeating the same reckless lies, despite Plaintiffs publicly presenting facts to the contrary and the same Florida Federal Court indicating, in a subsequent order, that is not the proposition for which the original order stood.³⁷
108. No Defendant, nor NCOSE, nor Matthew Jury, took the time to retract such reckless statements accusing the Tate Brothers of having victims. Conversely, Team Matrix shared the false statements all over social media and continue to do so in an extensive and obsessive manner.
109. Team Matrix refuses to make any corrections despite Plaintiffs producing text messages showing one the alleged "victims," from Florida, instructing a third party to fabricate evidence against the Tate Brothers to send to Romanian Authorities, after having discussed a plan to deceive Plaintiffs into purchasing them a house in Romania.³⁸

³⁵ Ms. Pinter and Ms. Roth also blamed the Plaintiffs for release of the names of Mary Doe and Jane Doe, but the names were released by the Romanian Police and repeated in the Romanian Press on numerous occasions prior to the names ever being used in a lawsuit by Plaintiffs. The name of Jane Doe was actually released in April 2022.

³⁶ Putting aside the obvious enforceability issues of a U.S. Federal Court Order on the Romanian Press.

³⁷ The order has been attached hereto as Exhibit Q.

³⁸ See text message from Jane Doe requesting the fabrication of evidence and instructing how it should be accomplished. Attached hereto as Exhibit R. Jane Doe, while she was in Romania, conspired with Mary Doe to obtain money by false pretenses. These texts are also included in Exhibit R.

110. To the contrary, Mr. Jury and Team Matrix doubled down and accused the undersigned, and other attorneys representing the Tate Brothers, of fabricating the text messages.³⁹ Even alluding to this is an utterly preposterous and desperate proposition.

111. The Defendants and law firms opposing the Plaintiffs, continue to make false public representations accusing the Tate Brothers of heinous crimes and other misinformation intended to influence the opinion of the Romanian Courts, U.K. Courts, opinion of courts and potential jurors in the State of Florida, and for financial gain.

112. In fact, showing a clear financial motivation, a member of Team Matrix, Players, indicated that: “they’re [Andrew Tate and Tristan Tate] gonna [sic] have to pay me to stop. Let’s put it that way. And it better be a big fat island that is no longer occupied by Jeffrey Epstein. Okay, I want the big game. I want the big stuff.” [Emphasis added]⁴⁰

113. On the other hand, Ms. Pinter from NCOSE has appeared to say whatever she thinks will help her case or sway public opinion; for instance, in a post made on X discussing the Court’s denial of her client’s motion to dismiss, she told her followers:

Ms. Pinter: “This [motion to dismiss] is a very low burden [for Plaintiffs] to overcome.”⁴¹

114. In completely contradictory fashion, on June 6, 2024, Ms. Pinter had the following exchange with the court during Jane Doe’s Motion to Dismiss Hearing, which preceded the posting:

Ms. Pinter: “So if they [Plaintiffs] are public figures, Your Honor, they would have to plead actual malice to state a claim for defamation.”

The Court: “And you’re saying they haven’t?”

Ms. Pinter: “No, Your Honor. That’s a very high standard.”⁴²

³⁹ Another true and correct copy of the text messages have been attached hereto as Exhibit S.

⁴⁰ This is in addition to Mr. Jury’s firm’s crowdfunding push with the backing of Team Matrix.

⁴¹ See X positing of Dani Pinter attached hereto as Exhibit T. Alleging that it was now a low burden for the Plaintiffs to overcome a Motion to Dismiss, which is exactly the opposite from what she told the Court.

⁴² See portion of hearing transcript attached hereto as Exhibit U.

115. On one hand, overcoming a motion to dismiss is “a very low burden” to social media, but to the court “it’s a very high standard” to plead malice and overcome a motion to dismiss.⁴³

116. Several members of Team Matrix reposted these representations regarding the ease of overcoming a motion to dismiss to help further their malicious, reckless, and intentional defamation campaign and downplay any success of the Plaintiffs ongoing defamation lawsuit in Palm Beach County, Florida.

117. A lawsuit that clearly supports the allegations that, at a minimum, Jane Doe, in concert with others, has fabricated crimes, fabricated evidence, and lied to authorities.⁴⁴ The lawsuit further shows a pattern of Jane Doe to maliciously utilize emotional and psychological manipulation for financial gain and benefits.

118. For instance, Jane Doe (the alleged victim from Florida) has indicated, by text message, she would do the following to The Tate Brothers and one of Andrew Tate’s close friends:

1. Actually killing one of the Plaintiffs’ close friends;
2. Blowing up the lives of the Plaintiffs;
3. Destroying the lives of the Plaintiffs;
4. Poisoning one of the Plaintiffs’ close friends;
5. Replacing the salt in restaurant salt shakers with anthrax to kill a friend of the Plaintiffs; and
6. Splay out organs of the Tate Brothers’ close friend, ritualistic style.

119. These types of statements were made while her attorney alleges that Jane Doe was “scared” in Romania.

120. The text messages are not indicative of a person that is scared, but one that is vengeful, malicious, and premeditated. The text messages themselves will be filed under seal with the court, due to a prior court ruling regarding confidentiality of those text messages.

⁴³ This amounts to nothing more than a clear manipulation tactic depending on the audience and what suits the forum best.

⁴⁴ The civil case is also supported by public facts showing that Mary Doe joined a conspiracy and helped fabricate evidence and crimes against the Tate Brothers, as well as lied to police. However, a Florida court determined that jurisdiction could not be obtained over Mary Doe, even though a conspiracy to defame, inflict emotional distress, and falsely imprison the Plaintiffs was adequately pled and supported.

121. Ms. Pinter claims incessantly that Jane Doe is “scared;” however, in a recent discussion with MilkBar, Ms. Pinter indicated that her client does not want people to look on Google and find out all the “nasty and embarrassing things” her client has done.
122. In reality, if Jane Doe has any fear, it is fear that the world is going to find out all her malicious behavior against people over the last several years of her life and lose the ability to continue to manipulate people around her.⁴⁵
123. In a recent deposition of Jane Doe’s ex-boyfriend,⁴⁶ he testified that Jane Doe obtained at least \$20,000.00 for a brain surgery that she told him she was going to undergo in the United Kingdom, in addition to approximately \$30,000.00 additional he gave her to move out of his house.⁴⁷
124. Jane Doe obtained the money under a false premise that it was for her brain surgery and false promise that it would be repaid, but not one cent has been repaid in over two years and she has made no such attempts to repay him.⁴⁸
125. As shown in text messages, Jane Doe was actually lying to the ex-boyfriend about recovering from surgery in the neuro-critical care unit, after she lied about having undergone surgery and having a brain tumor in the first place.⁴⁹
126. At the time she was lying to the ex-boyfriend, Jane Doe was actually not having surgery at all, but was instead concocting a human trafficking story that included instructing others to fabricate evidence against the Tate Brothers.

⁴⁵ See video clip of Ms. Pinter discussing the “nasty things” of her client with MilkBar:

https://drive.google.com/file/d/12sZWa9VvNYbWNolnGRmY2Lu2Vp7fTWQq/view?usp=drive_link

⁴⁶ He is a resident of the State of Florida and entitled to all remedies under Florida Law against Jane Doe.

⁴⁷ See Exhibit V.

⁴⁸ Jane Doe’s ex-boyfriend also testified that he gave her a car to use and an apartment, for her to be able to move out of his home after she had moved in under the agreement that she would stay for a month and, then, squatted for almost a year.

⁴⁹ See text message exchange where Jane Doe indicates that she is recovering in the hospital, which is attached hereto as Exhibit W.

127. Ms. Pinter, in the same recent discussion with MilkBar, indicated that her client never has claimed to be human trafficked.⁵⁰ However, this is completely contrary to what has been represented to the media, courts, and also what has been filed in the counterclaim of the alleged “victim.”^{51, 52}
128. Returning to Ms. Roth. She continued to twist court orders and, in November 2024, posted on social media that her client was dismissed after “five tries” by the Plaintiffs to sue her client.
129. However, there was only one (1) amendment (what Ms. Roth referred to as a “try”), which pertained to her client, after a dismissal of her client due to jurisdictional issues of minimum contacts. Although, the court noted that the conspiracy to defame, inflict emotional distress, and falsely imprison the Plaintiffs was adequately pled and supported in the Complaint.
130. These instances further show the propensity of the alleged victims' attorneys to get up in front of the world and disingenuously make claims and misleading statements regarding the cases and Plaintiffs.
131. Then, on February 10, 2025, attorney Dani Pinter of NCOSE violated a court order, which required any Romanian documents or contents thereof to be filed as confidential.
132. Ms. Pinter took it upon herself to publicly file counterclaims of Jane Doe against the Plaintiffs, which recited a large portion of the Romanian Indictment that is full of hearsay

⁵⁰ See video clip of Ms. Pinter discussing that her client, from Florida, has never claimed to be human trafficked, even though she regularly tells the court that her client is a “victim”:

https://drive.google.com/file/d/1NbZP_gaj9vrE53mIRiZxFml8lMzX75o/view?usp=drive_link

⁵¹ Ms. Pinter has further disingenuously claimed that the Plaintiffs have tried to “silence” Jane Doe. It is completely the opposite. The attorneys for the Plaintiffs have been trying to obtain testimony from Jane Doe for almost two years, which has been obstructed by Ms. Pinter at every turn.

⁵² Ms. Pinter and NCOSE now indicate that Jane Doe is “Striking Back” against the Tate Brothers for simply defending their name against the false allegations levied by her client by way of a defamation lawsuit.

and inadmissible evidence. Not to mention has been found to be legally deficient by a Romanian Court.

133. The court order that was ignored and violated was issued at the behest and insistence of Ms. Pinter. It is obvious she knew of the scope of the order and her actions were contumacious.

134. The court opined that the confidentiality order was issued to maintain the impartial administration of justice in both the Florida case and Romanian case, which Ms. Pinter has now wilfully disrupted, as the New York Times contacted a counsel for the Plaintiffs approximately 30 minutes after the unredacted filing of the counterclaim and published the story less than two (2) hours after the unredacted filing took place.

135. This appears to be a premeditated and additional contumacious act by Ms. Pinter.

136. Furthermore, NCOSE posted a link to the counterclaim containing the confidential information on their website and it was shared by the private accounts of Eleanor Gaetan, Dani Pinter, and Christen Price.

137. After the Plaintiffs' filed an emergency motion to seal for violation of the prior confidentiality order, the court ordered the counterclaim to be sealed in its entirety because it contained confidential information, pursuant to the prior confidentiality order, which further disallowed NCOSE from circulating the confidential information.

138. Since NCOSE removed the link to the counterclaim containing the confidential information, NCOSE added a new link to solicit donations, similar to that of Matthew Jury and his law firm.

139. However, Ms. Pinter has continued to repost public postings of other accounts showing confidential information in a further contumacious act.

140. Team Matrix continues to share the confidential information of the counterclaim and promote the donations to fund the defamatory campaign against the Plaintiffs and personal gain, even taunting Plaintiffs that they are continuing to circulate information marked confidential by court order.
141. Upon information and belief, attorneys and executives for NCOSE violated the order purposefully to bolster the defamatory media campaign against Plaintiffs and to receive further funding.
142. Plaintiffs would have preferred that all the text messages of Jane Doe be out in the open, which inexplicably show she was plotting murders and biological attacks, scheming to frame the Plaintiffs and fabricate evidence, as well as lying to an ex-boyfriend about having brain cancer to fraudulently obtain at least \$20,000.00 just prior to leaving for Romania; however, Plaintiffs respectfully followed the court's order and filed such under seal in their subsequent amended complaints and did not plaster the information all over social media after a confidentiality order was issued.
143. It is abundantly clear that Jane Doe is not a victim in this matter, as alleged by her attorneys, and it is understandable that an account named "Murdered" by Crayons (and others associated with him) would defend a person texting about plotting murders and fabrication of evidence.
144. While patching together a defense to Jane Doe's horrifying actions, Ms. Pinter and Team Matrix also accuse Plaintiffs and their attorneys of doxxing her, which is a completely untrue statement.
145. This accusation is based on one passport number of Jane Doe being accidentally filed in the exhibits of Plaintiffs, which the clerk of court in Palm Beach County indicated was not

confidential, and those exhibits being available in the public domain. This allegation may also be due to an address on a court summons, which is not confidential information, and common practice in civil lawsuits.

146. MS. PINTER, RECENTLY, DID THE SAME EXACT THING TO HER OWN CLIENT WHEN SHE FILED AN EXHIBIT WITH HER CLIENT'S PASSPORT NUMBER AND BIRTHDATE ON THE PUBLIC DOCKET.⁵³ This was also available in the public domain.

147. Ms. Pinter and Jane Doe also moved for sanctions against Plaintiffs' counsel when counsel inadvertently used the real name of Jane Doe, TWICE, buried in a lengthy court filing. When Ms. Pinter filed the proposed order to ask the court for sanctions, THE PROPOSED ORDER CONTAINED THE ACTUAL NAME OF HER CLIENT AT THE TOP OF THE FIRST PAGE. The very same issue she was complaining to the court about in her motion. Of course, Team Matrix did not pounce on that filing by counsel for Jane Doe, but circulated the motion for sanctions against Plaintiffs, crying foul.

148. This further illustrates the disingenuous nature of Team Matrix and those representing the alleged "victims" to create a media spectacle and likely garner more donations for their organizations. In short, this is a calculated action to take advantage of the Plaintiffs like any other person recklessly accusing them of crimes.

149. Continuing with the conspiracy to silence the Tate Brothers and any defense they may put forward, Ms. Pinter, from NCOSE, sent the following email, in pertinent part, to a witness coming forward to provide exculpatory information to the Tate Brothers about one of her clients:

"...I am also aware you committed statutory rape against my client. Although you seem to feel insulated from repercussions because time has passed if you take any actions to further the

⁵³ Filed February 24, 2025 in *Tate et al. v. John Doe et al.*, CASE NO. 502023CA011904XXXXMB, Palm Beach County, Florida (July 12, 2023).

harrassment [sic] and attacks on my client we will be forced to make the media, your employers and your community aware that you had sex with a minor and we will commit ourselves to fully investigating your actions before and after your abuse of our client and pursue all legal remedies available...

-Dani Pinter”⁵⁴

150. The lawsuit against Ms. Pinter alleges that, by the email, she maliciously threatened to expose the undersigned’s client to disgrace and criminal charges, by contacting all the people in his life, in a malicious effort to force the person to refrain from being a witness or providing exculpatory information to the Tate Brothers.⁵⁵

151. This threat was made even though it is alleged that Ms. Pinter had knowledge that the witness coming forward was induced into a relationship with her client, by her client lying to him on numerous occasions, using fake identifications showing the age of majority and alias, and using fake social media accounts with the age of majority; moreover, Ms. Pinter knew that her client had done such to many men in the past to obtain or extort financial gain and benefits.⁵⁶

152. Similar to Mr. Jury’s law firm sanctioning his defamatory comments, contact of a represented client, as well as malicious, desperate, and false bar complaints against attorneys for the Tate Brothers, NCOSE’s Senior Legal Counsel, Christen Price, Esq., was copied on

⁵⁴ Ms. Pinter appears to allege that becoming a character witness and providing exculpatory evidence is “witness intimidation.” It seems obvious that Ms. Pinter did not want her client’s horrifying past of extorting and taking advantage of men, by accusing them of crimes, to be revealed by this witness (an ex-boyfriend). However, in December 2024, a witness (another ex-boyfriend) gave sworn testimony (corroborated by text messages) that Jane Doe acquired, by claiming to have a brain tumor, at least \$20,000.00 from him. During Jane Doe’s time in Romania, in April 2022, she told the ex-boyfriend that she was undergoing the alleged brain operation in the U.K., for which she claimed to need the money, but was instead fabricating a human trafficking story. Then, she went to the French Riviera on vacation. The text messages and portion of the deposition transcript verifying these allegations are attached hereto as Exhibit V.

⁵⁵ Whoever, either verbally or by a written or printed communication, maliciously threatens to accuse another of any crime or offense, or by such communication maliciously threatens an injury to the person, property or reputation of another, or maliciously threatens to expose another to disgrace, or to expose any secret affecting another, or to impute any deformity or lack of chastity to another, with intent thereby to extort money or any pecuniary advantage whatsoever, or with intent to compel the person so threatened, or any other person, to do any act or refrain from doing any act against his or her will, commits a felony of the second degree.... (Emphasis added).

⁵⁶ Interestingly, Ms. Pinter, similar to Mr. Jury, falsely accuses the Tate Brothers’ attorneys of exactly her own conduct. The allegations against Ms. Pinter and her client are set out in the complaint attached hereto as Exhibit W.

the email containing the alleged extortionate language and allowed the alleged extortion of a potential witness.⁵⁷

153. Team Matrix and those associated, in a concerted effort, terrorize and threaten almost anyone coming to the defense of, or that support, the Tate Brothers.⁵⁸

154. Ms. Pinter, an officer of the court, has become so involved with Team Matrix that she apparently no longer thinks Plaintiffs are entitled to a trial in any court. By her own statement, Ms. Pinter has already convicted the Plaintiffs in her own mind and the kangaroo court of Team Matrix.⁵⁹

155. Eleanor Gaetan, acting Vice President for NCOSE, has also made many defamatory statements in furtherance of the conspiracy against the Plaintiffs.⁶⁰

156. According to her webpage at NCOSE, “Eleanor first met the human trafficking issue... in Bucharest, Romania, as USAID’s local democracy advisor (2000-2003).”

157. Counsels for Plaintiffs have uncovered a \$750,000.00 payment by USAID, with a country code ROU (Romania), that was listed as for “STRENGTHENING PROACTIVE CRIMINAL JUSTICE RESPONSE.” This is the same year Jane Doe and Mary Doe made false claims against the Plaintiffs, and the Plaintiffs were arrested in the same year.

158. On information and belief, USAID funds were used to fund “lawfare” and prop up a deficient prosecution against Plaintiffs under an indictment that the Romanian Court has since returned to the prosecutor due to the deficient nature of the allegations and violations of the rights of the Plaintiffs.⁶¹

⁵⁷ A copy of the alleged extortionate email is attached hereto as Exhibit X.

⁵⁸ Since the Defendants and supporters of the conspiracy have no legitimate defense, the undersigned suggests that the desperate attacks will further pivot to all attorneys for the Tate Brothers, due to the exposure of their scheme.

⁵⁹ See Posting by Ms. Pinter attached hereto as Exhibit Y. Of course, since this was a social media post, Ms. Pinter failed to mention the abundant amount of times she argued to a court how “important” it was that the criminal proceedings were resolved prior to the Plaintiffs civil cases proceeding.

⁶⁰ A true and correct copy of the defamatory comments by Gaetan have been attached hereto as Exhibit Z.

⁶¹ A true and correct copy of the supporting documents have been attached hereto as Exhibit AA.

159. Gaetan posted this defamatory comment on her X account, “Excellent 20 minute #TruthBomb on the repulsive criminal Andrew Tate.” This post was accompanied by a posting from Dani Pinter, an attorney from NCOSE.
160. Gaetan also has linked postings, on X, to members of Team Matrix, such as MilkBar. Another posting from Gaetan states, “Tate Brothers trafficked women on OnlyFans.” This posting tagged a main member of Team Matrix, Murdered by Crayons.
161. Moreover, Gaetan shared an X posting of Murdered by Crayons, which stated as the title of the posting, “My colleagues in @NCOSElaw.” The reposted content of Murdered by Crayons indicated that “The Tate Brothers sued, harassed, bullied, snared, and doxxed one of their alleged trafficking victims...”
162. The statement made by Murdered by Crayons and shared by Gaetan accuses the Tate Brothers of another crime, which is patently untrue, as the Plaintiffs have only availed themselves to legal remedies under the law.
163. In response to Gaetan’s posting of the confidential counterclaim referenced above, on February 10, 2025, Murdered by Crayons commented, “Smeared.”
164. Smearing the reputation of the Plaintiffs has been the malicious goal of Murdered by Crayons and Members of Team Matrix.
165. Gaetan made another X posting which stated, “Hey @nytimes: Tate Brothers TRAFFICKED her. It wasn’t “sex work,” a term invented by pimps. @NCOSE...”
166. Gaetan further goes on to state, “My org represent [sic] Tate victims. I’ve read depositions. He tortured young women. Many have not recovered. Do not normalize, restore, or uplift him.”

167. However, no depositions have been taken in the Florida case, with the exception of an ex-boyfriend of Jane Doe that she likely defrauded, nor the substantial equivalent in the first Romanian Case involving the Plaintiffs.⁶² In addition, a Romanian judge has also opined that there was not even reasonable suspicion for a great majority of the alleged victims.
168. Team Matrix circulates most, if not all, of these defamatory comments, regardless of the exculpatory evidence/information publicly available.
169. Some of the Team Matrix members present during the previously mentioned April 13, 2024 Space are as follows:
1. Players
 2. Murdered by Crayons
 3. Suzanne Wynter
 4. JustMe
 5. Sharon 36
 6. MilkBar⁶³
 7. PaxWax
 8. Skeptic
170. During that Space, JustMe further indicated that “we [Team Matrix] have to focus on Andrew Tate... we have to cut off the head of the snake.”
171. In the same Space, Players alleges that Suzanne Wynter is “working very hard” against the Tate Brothers. In addition, Players specifically gave a shout out to MilkBar and Murdered by Crayons for their “work” relating to Team Matrix.
172. Players also noted, in the April 13, 2024 Space, as follows: “We can help each other. I don't understand why you want us to stop gaining momentum. We were gaining

⁶² In fact, the alleged “victims” that Gaetan’s organization represents, have had the indictment against the Plaintiffs dismissed for all intents and purposes. *See* letter attached from Alexandru Risnita attached hereto as Exhibit BB. The lack of the Defense’s ability to confront the alleged victims was one of the violations of the Plaintiffs’ rights in that case. In addition, a Romanian judge has also opined that there was not even reasonable suspicion that a crime might have taken place for a great majority of the alleged victims.

⁶³ MilkBar has shown his financial motivation to defame The Tate Brothers: “A year ago this article was published by the @dailytelegraph after my first video on Andrew Tate went insanely viral over (nearly 12million views). A year later I'm no longer a forklift driver (now making videos full time) but still making viral videos (last week @newyorkpost.”

momentum... Hey, man, these spaces and Crayon's hard work has got him over 10,000 followers.”

173. JustMe, a member of Team Matrix also stated: “And I also noticed that there was a crayon murders [Murder by Crayons] was here. MilkBar was here. PaxWax is here. Other very prominent people are here.”

174. Players said in the Space, regarding Suzanne Wynter, as follows:

“Now, you've heard her talk. Does she sound like a 20 to 25 year old girl? No... and what I'm trying to say is the Tates or their lawyers are trying to purport that Suzanne [Wynter] and another account are the, are two of the Romanian victims posting against the Tates. You've heard her talk. Okay. She does not [sound like one of the victims], obviously she's not one of these people. She's just posting against the Tates. So why the F would McBride or the Tates think Suzanne is at any way attached, **except maybe through a third party, giving them information, telling them who Suzanne and this other account are for them to put it in the lawsuit. This is why we refuse to be infiltrated guys... This is why we needed to talk sooner because maybe we could have saved Suzanne sharing her personal information with that person.**”

175. Players indicated, in this statement, that the attorneys for Tates were given the real identities of Suzanne Wynters and Avalon to include in the lawsuit, which belong to Jane Doe and Mary Doe because Suzanne Wynter disclosed their real identities to a third party.

176. Suzanne Wynter, upon information and belief, is Jane Doe, who has levied false claims against Andrew Tate and Tristan Tate, but that is denied by her attorneys from NCOSE.⁶⁴

177. Jane Doe and Mary Doe have given declarations, in that case, attesting that they are not the owners of such accounts.

178. Those accounts were deleted and renamed shortly after the allegations in Exhibit M were filed against them, which alleged that the accounts belonged to or were controlled by two

⁶⁴ A true and correct copy of the Tate Brothers' lawsuit against Jane Doe and Mary Doe have been attached hereto as Exhibit M.

women that made false claims against Andrew Tate and Tristan Tate. One account, Avalon, was ultimately deleted.

179. Moreover, Jane Doe has admittedly submitted a “**completely false narrative**” against another man in a sworn court document filed in Palm Beach County, Florida.⁶⁵ Thus, she has no reservation to walk into a court of law and lie based on her own prior actions and statements.

180. Jane Doe further has no reservation to instruct the fabrication of evidence to escape liability, as text messages show in *Tate v. John Doe, et al.*⁶⁶

181. Suzanne Wynter is a very active member of Team Matrix. In a September 23, 2023 posting on X, she stated, “I am just a small cog in the wheel, Crab Man set the bar, [C]rayons, Milky TV [MilkBar], Gadget, Avalon... do their bit also.”

182. On or about January 5, 2025, Suzanne Wynter made a posting that listed many members of Team Matrix.⁶⁷

183. Players has bragged about Murdered by Crayons “turning” people against the Tate Brothers in a statement as follows: “Crayons turned a couple just yesterday.”

184. The accounts utilized by the Defendants often meet online in Spaces and post and re-tweet each other’s postings. For instance, Gadget recommended to follow Skeptic, at Skeptic’s request to increase her following, and this post was reposted by Suzanne Wynter.⁶⁸

⁶⁵ At the time the sworn statement was made, Jane Doe was over the age of 18. The victim of that false report has brought a lawsuit against Jane Doe for abuse of process, among other causes of action, which is attached hereto as Exhibit W.

⁶⁶ See text message exchange where Jane Doe requests another person to fabricate evidence against Andrew Tate to bolster her false claims of being human trafficked, which is attached hereto as Exhibit CC.

⁶⁷ See Exhibit DD showing Wynter listing out members of Team Matrix.

⁶⁸ See Exhibit EE.

185. These accounts utilized by the Defendants are acutely aware of the pending lawsuits in *Tate v. Jane Doe, et al*, *Fisher v. Gabbey, et al*, and *Pencov v. Gabbey, et al*, the allegations, exculpatory text messages, and supporting documentation within the lawsuits.
186. With knowledge of facts supporting the allegations by the Plaintiffs against Jane Doe and Mary Doe in those lawsuits, the Defendants ignore the facts and instead continue to intentionally and recklessly accuse Andrew Tate and Tristan Tate of heinous crimes, including rape and human trafficking, as well as having sexually transmitted diseases.
187. These accounts, utilized by all Defendants, have maliciously, intentionally, and with reckless disregard for the truth come together to form a conspiracy online, in concert with Jane Doe, to defame the Tate Brothers, post defamatory information, influence public opinion regarding the pending cases involving the Tate Brothers, and influence the outcome of any civil or criminal case.⁶⁹
188. Supporting that one of the alleged victims is part of the conspiracy, Murdered by Crayons and others speak about having a “full Romanian Indictment,” but, before “we” post it, the indictment needs to have the information of the alleged victims and accused redacted.
189. However, the only persons permitted to be in possession of such an Indictment are the alleged victims, the accused, and their counsel.⁷⁰
190. Many of the Defendants’ accounts have gone to great lengths to hide their identities to remain anonymous and avoid repercussions of their maliciously made defamatory statements. These accounts appear entitled to do or say whatever they want because they hide behind the cloak of anonymity.

⁶⁹ The Defendants, in this case, have posted regarding the Plaintiffs hundreds of thousands of times, including thousands of defamatory statements from the accounts of the Defendants.

⁷⁰ See letter of Alexandru Risnita, Romanian Defense Counsel to Andrew Tate and Tristan Tate, attached hereto as Exhibit FF.

191. For instance, in the Space, dated April 13, 2024, Players indicated as follows:

“I had to talk somebody else here through some security measures that they may not have been aware were visible to other people. And that includes like hiding your birthdate. You know, don't let anybody see things that Twitter doesn't require to be public. You know, be careful of putting links in your bio that might give away your location other than like, some people just put like North America on their location for Twitter because they want people to know they're not from the UK or Romania or anything like that. Like country is but you know, again, at your discretion.”

192. Neither one of the Plaintiffs have ever admitted to committing a crime, especially relating to human trafficking or rape, as the Defendants obsessively state to bolster their social media campaign against the Tate Brothers.

193. In fact, the Defendants, over and over, post the same video of Andrew Tate joking around with a female (as they have both publicly stated) and insist, *ad nauseum*, it is a true video of an assault.⁷¹

194. The videos and messages that Team Matrix often circulate, of the Tate Brothers, are taken out of context and cobbled together to maliciously defame the Plaintiffs.

195. Attorneys from NCOSE, Mr. Jury, and Team Matrix fanatically proclaim that the Tate Brothers are “liars;” however, when the alleged victims' attorneys and Defendants clip a video or portion of texts, of the Plaintiffs, that somehow fit into Defendants narrative (leaving aside that the videos and texts are out of context), they “believe” the Plaintiffs.

196. The Defendants and attorneys for the alleged victims attempt to twist reality to fit their defamatory campaign at the moment.

197. On February 27, 2025, the Tate Brothers received significantly reduced travel restrictions, receiving back their passports, and being given the ability to travel worldwide.⁷²

⁷¹ Many of these accounts purposefully misrepresent the actual age of the female to further defame Andrew Tate.

⁷² In a recent interview, dated March 7, 2025, Ms. Pinter indicated that “we” are going to find out if the Tates’ did anything in Florida because “James” [Uthmeier] has opened an investigation into them. It is highly likely that Ms. Pinter and NCOSE advocated for “James” [The Attorney General of Florida, for clarification, as Ms. Pinter informally referred to him as “James”] to open an investigation into the Plaintiffs and has injected herself into the alleged investigation, in order to further weaponize the justice system against Plaintiffs. However, Mr. Uthmeier’s office is supposed to be protecting people within Florida from people like Jane Doe, not enabling her, and not

More Defamatory Statements Made in Postings, “Spaces,” and Other Videos or Audios

198. The defamatory statements against the Plaintiffs, from the below referenced accounts, began and took place between July 12, 2023 and the filing of this lawsuit. The statements are not a comprehensive list of the defamatory statements made by the Defendants, as the defamatory statements are too numerous.⁷³

199. The defamatory statements were proffered by the Defendants in a combination of social media postings, social media comments, and videos or “X Spaces” that referenced or were directed to Plaintiffs.

200. Suzanne Wynter:

1. “FORCING WOMEN TO HAVE YOUR SONS, IS CALLED RAPE.”
2. “WHEN TATE SAID HE LOVES HITTING WOMEN, HE’S NOT JOKING.”
3. “Imagine the pain of finding out your daughters aren’t in college but were sex trafficked...The Tates made a point of isolating victims from their support systems.”
4. “Imagine having to hide from your abuser in a bathroom.. Probably another girl too scared and brainwashed to come forward.”
5. “Tristan is a quieter more ruthless version of Andrew, has a reputation for throwing women outta their homes including his baby momma & child... Watch the quiet ones.”
6. “Nothing surprises me anymore regarding Top Groomer.”
7. “Some of Andrew Tate’s alleged victims describe his violent sexual assaults... Please donate to the crowd fund to help them bring him to court - the authorities let them down: <https://t.co/SUM2NWg4uP> <https://t.co/2g0dvpJwdM>.”
8. “HOW MANY WOMEN HAVE HAD LIVES RUINED FROM TATES PHD COURSE 🤔. The main source of income these men relied on was pimpin out partners & swapping ideas on how to lure fresh prey... I guarantee War Room Members are still making a career outta the ruination of females.”
9. “TATES UNDERAGE PARTIES 🤔... One tactic used by the Tates was holding parties, inviting girls of all ages... Messaging minors on Instagram, grooming girls with false promises of love, wealth, a better life.”
10. TATE BACK TO HIS OLD GAME OF THREATENING PEOPLE INTO SILENCE 🤔... How many more people are going to be threatened with defamation lawsuits... Is he gonna come after Me, Crayons, Gadget, all his critics... Typical narcissistic behavior, attack, lie, slander but deny everything 🤔.”
11. “Andrew Tate is threatening to sue me for defamation... Oh no, his beautiful reputation as a sex trafficker rapist has been defamed... It’s called a truth defence cunt... See you in court.”
12. “The Tates LIED about the Florida case, Myron hosted a space repeating the lies and he ran away from Crayons like a COWARD.”
13. “WHY DO MEN WITH MONEY THINK LAW’S DON’T APPLY TO THEM ? ... The reason the Tates narrated and documented all their dirty deeds, is because NO ONE spoke out These 2 sex traffickers should have been stopped years ago.”
14. “Tate posing in his Joseph koney t shirt, whilst pretending to mentor half naked girls on the game of chess... The guy is a complete narcissist and psycho and he doesn’t care who knows it 🤔🤔🤔.”

participating in a publicized witchhunt targeting the Tate Brothers. See audio recording of Ms. Pinter at the following link: https://drive.google.com/file/d/1dvRi_f95rFF5rXsknyBrGFVdFiy58E5K/view?usp=drive_link

⁷³ The defamatory statements number into the thousands, if not tens of thousands.

15. "I risked my account once again to prove that the account of sex trafficker Andrew Tate is protected by X."
 16. "He's happy trafficking underage girls, refugees and vulnerable women from Eastern European countries... I can't wait for this man to get his commupance."
 17. "THE MAN BEHIND THE MASK 🤖 Andrew Tate chose to hide behind a mask when he first began pimpin girls He even states " no one knew I had a cam company" That's not strictly true, people were posting messages on Reddit warning girls about him ONCE A PIMP, ALWAYS A PIMP 🤖👤"
 18. "Tristan Tate is hiding replies from people correcting his misinformation. Dani Pinter is the lawyer for the defense, and he doesn't want his fans to know the truth. What a sad, cowardly, sorry excuse for a man. Tate fans, is your masculine hero?"
 19. "WAR ROOM MEMBER JACOB WOHL HIRED BY GHISLAIN MAXWELL FOR 25K IN SMEAR CAMPAIGN !! Sounds familiar, this is exactly what the Tate brothers have done with their victims Sulaimain Ahmed, Censored Men etc were hired/paid by Team Tate to harass victims into silence."
 20. TRISTAN TATE SPOUTING MORE LIES 😏... Grooming minors isn't a secret ..."
 21. "The only defense the Tate brothers have is to lie and deceive. A judge DID NOT rule that the victim was lying or knew she was lying. Tate made that allegation and falsely claimed the judge said it. You're a fraud, coward, and compulsive liar @TateTheTalisman."
 22. "THE WORLDS MOST GOOGLED RAPIST 🐱"
 23. "Tate lacks such self awareness he's proud his rise to fame on Google was being known for rape and human trafficking women ♂ #1 Most Google Rapist"
 24. "Now we know y Candace Owens protects sex trafficker Andrew Tate."
 25. "[Andrew Tate is a] cult leader."
 26. "It's blatantly obvious Tate is GUILTY as hell."
 27. "Haven't you considered it might have something to do with trafficking minors."
 28. "No Wonder the victims didn't go anywhere, they were constantly being monitored and watched." [However, video shows alleged victims moving freely in and out of the property, going to the mall, shopping and moving around as they will] [Emphasis Added].
 29. "...Tate used Bitcoin to avoid paying taxes."
 30. "Andrew Tate wouldn't have his Sex labouring empire without emotionally and psychologically breaking the girls spirit..."
 31. "What does he [Sulaiman Ahmed] get out of defending a sex trafficker?"
 32. "Tristan Tate Slave Owner, Pimp, and predator."
 33. "Tate has complete mental and physical control over these girls"
 34. "NEURO LINGUISTIC PROGRAMMING, MANIPULATION AND BRAIN WASHING."
 35. "LISTEN TO VICTIMS RELIVE THEIR NIGHTMARES AT THE HANDS OF HUMAN TRAFFICKERS... THEN DECIDE WHETHER YOU STILL SUPPORT ANDREW TATE."
 36. "I CAN'T WAIT FOR JUSTICE, WATCH TATE SUFFERING JUST LIKE HIS VICTIMS."
 37. "SOME OF THE PROPERTIES USED TO HOLD [Tates'] VICTIMS." [Emphasis Added].
201. All of these defamatory statements made by Suzanne Wynter were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

202. Murdered by Crayons:

1. "The only defense the Tate brothers have is to lie and deceive. A judge DID NOT rule that the victim was lying or knew she was lying. Tate made that allegation and falsely claimed the judge said it. You're a fraud, coward, and compulsive liar @TateTheTalisman."
2. "He said that the rape charge was thrown out. That is false. He was charged with rape in continued form because there are two material acts, but there's one victim."
3. "You need an act, which in this case would be recruitment. The brothers recruited the victims through various apps, such as Instagram, marriage apps, dating apps, etc. They have additional acts on top of that."
4. "They transported the victims from their home countries to Romania. They harbored those victims in houses made for the sex workers. So they have multiple acts. They have recruitment, they have transportation, and they have harboring. They also have situations where they transferred those victims from one location to another location, from one sex worker house to another sex worker house."
5. "The means is deception. The reason the means is deception in this particular case is because the brothers would recruit the victims and they would build a false relationship with the victims. It usually went on for a couple of months. They would lead the girls on to believe that they were interested in a romantic relationship or in some particular situations that they actually wanted to marry them, and they would eventually meet them somewhere. They would build up the relationship online like you would with a dating service, like a dating app. Eventually, you would meet in person and they would sleep with them, right? They would do all of the things that they talked about. They would meet them. They would have sex with them to make sure that they were quality. They would then talk them into going to Romania. They would pay for their tickets. They would transport them to Romania. Now, most of the victims, not all, but most of the victims did not know anything about OnlyFans or Webcam before they got on the plane to go to Romania."
6. "They didn't find out about this until they actually got in Romania. They were put in the sex worker house and they were starting to get pressured into doing various types of sex work and taking explicit pictures, explicit photos."
7. "So they recruited them and they deceived them and they did this for the purpose or intent of sexual exploitation. In this particular case, it is commercial sex work. So you have recruitment, you have deception, and you have sexual exploitation. And there are other parts involved as well. There's coercion. There's fraud."
8. "Luana Radu and Georgiana Naghel, they have been charged. They were pretty much the enforcers."
9. "And when you see the intimidation of, I'm gonna call her Jane Doe now, but you all know the particular victim in the US who they've, them and all of their PR accounts have harassed this victim tirelessly, hosting various pictures and making up lies about things that she was involved in. When you look at that harassment and the things that they did to her, that was not only a message to her, that was a message to every single possible victim that might come forward against them in the future."
10. "One of them is the American victim and one of them is the victim from Moldavia. Those were the two who were rescued by DICOT during the April raid."
11. "Tristan has three human trafficking victims."
12. "And of course, Georgiana and Luana, they're spread out, consolidated between the two because they worked as their enforcers..."
13. "They were intimidating two of the victims to change their testimony and they got caught doing it. They got caught trying to intimidate victims to change their testimony."
14. "And in the instance of the actual rape that we can get into later, that happened in a hotel room. That happened in a hotel room. So you have to think about, you know, CCTV can show some things."
15. "So this is the way it worked. They would first put the girls on TikTok. It was a great way to break the girls in, right? You don't just drop them into the middle of pornography. You wanna butter them up, work them in slowly. You wanna boil the frog. So the goal was to get them to reach 1,000 followers on TikTok. So they would upload videos until they get 1,000 followers. Once they got 1,000 followers, they were able to go live on TikTok. Once they were able to go live on TikTok, number one, they could get monetized on TikTok."

16. "they're [the women] given ultimatums, right, in terms of just one level, you know, one level after another in terms of trying to boil the frog to get them to, for ultimate compliance [or manipulation]. So this one particular victim at the time, Vivian was the main girl."
 17. "No, if 10 percent of this document is true, they're all going to prison. All four of them are going to prison. But, you know, they're going to they get to go to court."
 18. "For those who are not aware, the Tate brothers previously filed a criminal complaint against two of their alleged trafficking victims. The judge threw it out. The Tates then sued the same two in the USA, where they are abusing the legal system to harass the victims."
 19. "So he [Andrew Tate] exerted physical violence and he punched her in the head from that mistake and thought she might correct me if I'm wrong. I believe this particular victim, she got punched in the head and then Andrew raped her."
 20. "Andrew Tate is guilty change my mind"
 21. "The topic of this space is Andrew Tate is guilty, changed my mind."
 22. "Andrew Tate is a compulsive liar - Prove me wrong"
 23. "Welcome to another Space on X, where we are talking about the Tate brothers. And I'm feeling a little bit feisty today, so this one's going to be Andrew Tate and Tristan Tate are compulsive liars and cowards."
 24. "Andrew Tate's "the real world" is a pyramid scheme"
 25. "Exposing Lies in the Andrew Tate case - New victim info #andrewtate"
 26. "The criminal activities of these defendants (Tristan & Andrew Tate) are a form of slavery."
203. All of these defamatory statements made by Murdered by Crayons were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.
204. Murdered by Crayons' account has over forty-four thousand posts defaming Plaintiffs and a pinned profile post with 28 million views.
205. Murdered by Crayons uses gaslighting and bullying tactics to "turn" people to his point of view, even going as far as calling Pro-Tate supporters "fatherless losers."⁷⁴ However, Murdered by Crayons sets the example for his own children of spreading hate and defamation about two people he has never met, as he indicated that he is "doing this with my kids."
206. Murdered by Crayons further speaks about "scorched earth" and "destroy[ing]" the followers and supporters of the Plaintiffs.

⁷⁴ See example posting from Murdered by Crayons attached as Exhibit GG.

207. Avalon:

1. "2 of the victims are seeking only €200,000 from 2 men who say repeatedly they are "billionaires"????????? Clearly money is the last thing on their minds. We do know however that various victims continue to be sued in America by the Tates and other funded men, stalked, harassed, intimidated, have had their lives ruined, continue to live under War Room control physically, emotionally and financially, doxxed, and had Tatertots and The Real World students targeting them en masse both in RL and online."
2. "...true transcripts show the 2 victims were frightened, had realised they were being trafficked and had to nervously plot their escape."
3. "Andrew Tate is now trying to reinvent himself by claiming he's against devil worshippers ~ Yet he is a webcam pimp, a human trafficker..."
4. "Andrew Tate human trafficked lasmina Pencov from a God-fearing Christian girl into OnlyFans sex work posting "anal s*x" posts."
5. "Andrew Tate's Moldovan accuser is also autistic. 2 autistic victims."
6. "The real SEXUALLY VIOLENT Andrew Tate."
7. "Andrew Tate intimidated victims and/or influenced their statements from jail."
8. "Tristan Tate flouting the law against witness intimidation by getting his
9. minions to do it and retweeting it."
10. "We already know Tristan LIED from the outset when he feigned a pretend interest in the US victim teaching him music."
11. The [the Plaintiffs] know full well who represents the U.S. victim. They dox and intimidate her endlessly... They hunt poor vulnerable women..."
12. "...They HUNTED VULNERABLE FEMALES TO EXPLOIT..."

208. All of these statements made by Avalon were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

209. MilkBar:

1. "Proof Andrew Tate filmed a sex tape beating a 14 year old girl...The disturbing tape was filmed in 2012 & has been in circulation for a while but the age of the woman (she goes by different names including Vivian & Cobrababyyy) who is seen being beaten by Andrew Tate."
2. "Kris Tyson is a sicko but Tristan Tate has no right to call anyone a pervert."
3. "This is a video that clearly proves how Andrew Tate trafficked women."
4. "Andrew Tate is a groomer."
5. "Proof Andrew Tate is a human trafficker."
6. "When people hear human trafficking they think Sound of Freedom & Tate plays on that ignorance but his whole operation was definition human trafficking."
7. "Both have done well to call him out for the vile scumbag he is."
8. "Andrew Tate is exactly the kind of vile human that sides with a peadophile if he believes it benefits him."
9. "The criminal activities of these defendants (Tristan & Andrew Tate) are a form of slavery."

210. All of these defamatory statements made by MilkBar were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and

recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

211. Sheep:

1. "Tristan Tate admitting how he trafficked girls to various countries and that he had a virgin work for him"
2. "If someone wants to ask Andrew Tate (@Cobratate) to join this space & defend why it appears he made a sex tape with a 14 year old we'll be going live in 6 hours. He'll have to unblock me though."
3. "He's publicly admitting to sex trafficking women"
4. "There seems confusion around the Tates rights to sleep with young girls and AGE OF CONSENT. 🇷🇺 In Romania, IF both parties are "CLOSE IN AGE" by 3yrs it is not punishable. More is. As Americans the Tates ARE NOT allowed to engage in illicit sexual conduct with persons under 18yrs"
5. "Tristan Tate on "fcking virgins".... "One of my main chicks has over 200 thousand Instagram followers and I took her vaginity when she was just 17!"
6. "Andrew Tate posts... "human trafficking" We have seen the tattoo. No need to point out what you are doing"
7. "🇷🇺 Question to men who are Tate fans: if Andrew Tate & his bro Tristan took naive young boys (minors incl), as per indictments, locked them in a room in front of a camera to shove things in themselves for hours so they can make money, beat them, r*pe them, would u be OK with that?"
8. "Tristan Tate ADMITS he's a human trafficker and TAX EVADER. 🤔 But we know this!! as according to the CPFA of Ilfov there are no records of your tax income and they have evidence of your transactions of £500.00 referenced as "poo money" or "pimpin". 🇷🇺"
9. "Iasmina (a victim in the case covering up for Tate that now hides out in Dubai) says.... "I have never worked for the Tates". The chat logs taken off their electrical devices proves she not only worked for them but was tormented & abysed"
10. "Vivien, Tates bottom B casually disussing how she's seen boyfriends strangle girls to death. And Tate posts about how he needed help with a body assisted by his other bottom B Georgiana."
11. "Excellent list of videos by @C_S_Skeptic exposing the Tate pimps. Take a look 🙄"
12. "Tristan Tate is crying.... They won't give me my stuff back. Tates LOST their appeal for seized assets. 🙌🙌 Tristan is confused and thinks that seizing assets bought through ill gotten gains will ruin Romanias reputation!! He's not very sharp lol."
13. "Can somebody please tell Andrew and Tristan Tate that it was an ASSET court hearing and that the alleged rape and trafficking victims are not set to be there! So who is the victim [REDACTED] ?? Andrew why did you delete your post ey? Lol"
14. "Three days ago, pimp Andrew tate posted this video. Notice anything on the legs? Looks like Tate never gave up his "brand" manager position. What does it look like to you?"
15. "Andrew Tates 3 stage plan TEXTS of manipulation to his TRAFFICKED "wife" 1: You are MY wife forever 2: force a 3some with her & Georgiana (co accused) they must be girl friends 3: if you work with Georgie keep all the money. VICTIM: I came here to be YOUR lover NOT THEIRS!"
16. "Andrew Tate... "B*TCH PUT THAT BURKA ON AND SHUT THE FCK UP". Also Tate becoming a Muslim so he can stone Muslim women. Also victims complaining about his STDs.... POS!"
17. "Tristan Tate has just admitted to trafficking the mother of his child. 17 may be above the legal age for a relationship (within parameters, but not for sex work. She was a virgin when they met. Then the whole world got to see her."
18. "Andrew Tate scammed everyone on his cam accounts..."
19. "Another account dedicated to exposing Andrew Tate is suspended!... The fact @X is clearly biased towards a woman beating pimp..."
20. "I'm going to go out on a limb Andrew Tate & say it's less about you telling men to go to the gym & more about you indoctrinating men to groom women into sexual slavery."

21. "Andrew & Tristan Tate only care about children when they can pimp them, scam them, or have sex with them."
22. "He's [Andrew Tate] a vile scumbag & a con artist, a net negative in the world."
23. "Yeah more like team human trafficking."
24. "Is the planet a prison for sex traffickers" [posted above a picture of Andrew Tate] {Emphasis Added}.
25. Andrew Tate you forgot to add yourself and P Diddy to your long list. You can both FO. Prison awaits! Go get you some!!"
26. "I am here to fight traffickers & men with ulterior motives

212. All of these defamatory statements made by Sheep were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

213. Sheep gives congratulations for the defamatory work being done by MilkBar and Murdered by Crayons, stating: "Nice job!!! milk Bar and @CrayonMurders."

214. Gadget:

1. "Some of Andrew Tate's alleged victims describe his violent sexual assaults... Please donate to the crowd fund to help them bring him to court - the authorities let them down."
2. "The Tates LIED about the Florida case, Myron hosted a space repeating the lies and he ran away from Crayons like a COWARD."
3. "I'm just going to put the fundraiser in now and just get into it because yeah. Yeah. All right."
4. "There is an EYEWITNESS to one of Andrew Tate's alleged rapes."
5. "Leaked video: Andrew Tate snitches on himself about CRYPTO SCAM."
6. "Andrew Tate admits to being a PIMP who EXPLOITS WOMEN and takes ALL OF THEIR MONEY."
7. "Andrew Tate responds to claims he recorded a sex tape abusing a 14-year-old. The same woman he has publicly admitted to having an intimate relationship with when she was 15."
8. "Andrew Tate is a GROOMER."
9. "Top Groomer"
10. "This is Sulaiman Ahmed admitting to traveling to collect 'evidence' for Andrew Tate that was later used to harass, intimidate, and sue one of Tate's human trafficking victims."
11. "Andrew Tate used to BRAG openly about being a DEGENERATE PIMP (thread) In 2015, he commissioned this artwork portraying himself as a pimp, which included the following poem: "Big Tates' hoes sell dreams, and waste men's time. "The men pay to stare, cause the hoes look"
12. "Conclusion: Andrew Tate claims to have simply managed some webcam models many years ago, found God and seen the error in his ways. In reality, he was the lowest form of degenerate pimp who trafficked and exploited women. (All according to his words)."
13. "GADGET REACHES 10K FOLLOWERS. I'm kind of a big deal."
14. "Andrew Tate's obsession with the genitals of young boys."
15. "Andrew Tate is abusing kids for leaving his online "school." If they choose to cancel their subscription and select "I can't afford it," they cop this tirade. Andrew tells them they are lying, didn't try and if they did and didn't make money, they are an idiot."

16. "Andrew Tate rants on a weekly basis about "Satanists" coming for you and your children. Also, he has posted about employing a witch from a family of witches. She can also be seen praising Satan. The "witch," Luana, is charged with human trafficking alongside the Tates."
 17. "EXPOSED: Andrew Tate is ABUSING KIDS who try to quit his "University"
 18. "Andrew Tate is STILL teaching his trafficking methods to young men. Here, a former member of Tate's "War Room" talks about the immediate upsells of courses once you join the \$8,000 network. One is his PHD OnlyFans course, where he teaches how to be a human trafficker."
 19. "For those who feeling clients report Andrew Tate's "the real world" to the Google Play store or the Apple App Store like I did, it's very quick and easy to do." @Apple @Google The app for Andrew Tate's MLM scheme "the real world" is now connected to the new charges of trafficking minors. It is important that Google and Apple are made aware of this, please repost, see below links to pass on feedback..."
 20. "Keep in mind, this is in 2020. So another one of the lies from Tristan specifically, he said that he hasn't been involved in webcam for many years. That's completely not true on multiple levels, but this particular audio file was sent in 2020 and it was sent to his enforcer by the name of Naomi John. Naomi John is the enforcer that it was sent to."
 21. "Tristan Tate defended sex crimes against a 15 year old in 2021... But sure. The sex crimes against minors that the Tates are being charged with are fabricated by the matrix/jews."
 22. "Andrew Tate's past crypto scams – EXPOSED."
 23. "Andrew Tate made his fortune through being a human trafficking pimp."
 24. "Andrew Tate was a filthy, degenerate pimp."
 25. "@NMIpayments has a "human trafficking policy" while supporting self-confessed human traffickers." [Referring to the Tate Brothers] [Emphasis Added].
 26. "NMI Payments has a slavery and human trafficking statement on their website, while publicly allowing the most notorious human trafficker in the world, Andrew Tate to use their services..."
215. All of these defamatory statements made by Gadget were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.
216. Skeptic:
1. "Tate's 'success' is a lie."
 2. "Tate arrested for Kiddie Porn (since the minor was doing webcam)."
 3. "If you know anything at all about them... call the authorities before they call you."
 4. "Not guilty until proven guilty. A formality at this point."
 5. "The American victim was raped in the bathroom and then forced to perform on webcam."
 6. "The Moldovan rape victim."
 7. "These two gangster pimps."
 8. "He made money trafficking women and forcing them into pornography."
 9. "The American Victim... Tristan had already started to pressure her into performing sex acts on camera"
 10. "She [Mary Doe] was dumped off at the cam house after being picked up by Georgiana at the airport, then steadily pressured into performing on camera. This woman was reportedly raped twice by Andrew as he tried to break her down."
 11. "Once in an orgy where he used liquor and other women to break down her defenses..."
 12. "DIICOT did in fact rescue human trafficking victims as a result of their successful raid."

13. "But as it turns out, due to the radicalization of youth in the UK, the government has had to provide an extra two billion pounds to their nationwide education system, to fund programs meant to stamp out the misogyny being spread in schools by boys who have been brainwashed by Andrew Tate."
 14. "These text logs are obviously faked."
 15. "At the time, Mr. Big Shot Cam Pimp [Andrew Tate] would have been at least 34 years old while he was bedding this girl in junior high."
 16. "So now the self-help regurgitations being produced are how the Tates exploit foolish boys that succumb to the pyramid scheme known as the real world."
 17. "But let's see how many other boxes the Tait criminal organization checked off, using only the Moldovan victim."
 18. "Recruiting. That was mainly the domain of the brothers, as was transporting the victims to Romania most often by plane."
 19. "While the Moldovan girl was at the cam house, whenever she put up resistance against appearing on camera for Tait's benefit or the coercion from Georgiana and Luana to join the other girls, she was threatened with and subjected to sexual and physical violence, including the two reported rapes. That was after Georgiana tried to coerce the victim into joining the other girls on camera to get her comfortable performing for an audience. Fraud comes into play here when the traffickers held false debts over her head and deception was the promise of a romantic relationship, a marital relationship that brought her to Romania in the first place."
 20. "The abuse of power and preying on vulnerability come into play jointly here as the powerful social media influencers targeted primarily poor and disadvantaged girls."
 21. "...the transportation back and forth by Tristan of the minor to the minor child that Andrew had producing porn for him."
 22. "Once they were locked in the house, they were not able to choose their own schedules or even what activities they were going to perform on camera. They were told what hours to work, how much money they had to make before they could stop, what to do, how to do it, and even what sex toys they needed to use on themselves during a particular session. They were fined if they came up short on money, if they weren't smiling, if they were crying, if they didn't appear happy, or for whatever else that the Tate's bottom bitches saw fit to dock them for."
 23. "Going back to the Moldovan girl, two other women listed as victims were instructed by Tate to take the Moldovan girl to a hotel room, get her drunk, so that by the time Tate arrived at the room, she wouldn't be able to fend off the orgy that Tate had planned for the four of them to open her up sexually."
217. Skeptic makes bizarrely false and maliciously defamatory statements about the "Moldovan girl," even though text messages show that Andrew Tate asked the women not to get drunk and further show that she said she liked the experience.
218. This was a completely voluntary act on the part of the Moldovan woman (Mary Doe) and she even speaks about enjoying subsequent sexual encounters with Andrew Tate.⁷⁵
219. All of these defamatory statements made by Skeptic were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of

⁷⁵ Even when presented with this supporting proof, attorneys for Jane Doe and Mary Doe insist too on calling her a "victim."

fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

220. Skeptic has now started his own GoFundMe crowdfund, in a purely opportunistic action, to make money off the defamation campaign against the Plaintiffs.

221. In echoing the sentiments of Murdered by Crayons calling Tate followers and supporters fatherless losers, Skeptic calls the followers and supporters of Tate “trash.”

222. Skeptic and other Defendants erroneously, recklessly, and maliciously accuse the Tate Brothers and counsel of misrepresenting facts and violating orders of the court in Florida—in a very similar manner to attorney Julian Roth.

223. Players:

1. “Anyway, yeah, with the trauma bonding, it's incremental. And with a lot of these victims, what it ends up being is they get in so deep. And even if it's six months to a year, so much psychological manipulation can happen. And to break it down very simply, it's do this or I'll leave you, do this or I'll leave you, do this or I'll leave you. And first, it's small things like when Crayons might have said, you know, in the chat logs, they have to give their women assignments. You know, keep the women busy doing things for you. Make me a coffee. That's easy. You know, then it's make me a sandwich, make me dinner, you know, have a three-way. Like, it's very incremental. And for the women, their hearts are trauma bonded to this person and they don't want to give up what they've invested, what they've compromised, what they've capitulated so far. And so they think, oh, well, you know, it's just a little more. It's just a little more. And next thing you know, they're not the number one girlfriend. They've been replaced in some way. They can feel it. And when you're a victim, you don't want the abuse to continue. So you might try to do extra, more than he's asking. Yes, daddy, like talk the way he wants you to talk, act the way he wants you to act, because then he won't be abusive and take away his love, right? But with all of these guys, it's all transactional. It's what are you going to do for me? And the women at the end don't get anything. They don't get money. They don't have a relationship. They have no friends except for the people that he allows them to talk to. It's very abusive, and it's seclusionary. There's also the triangulation amongst the women. So you can't even trust each other, you know, to like, let's make a plan and get out of here. We can be our own managers, you know, if that's what they want to continue doing. But I mean, it's really terrible. And I think Vivian, I think she would love to get out of it a long time ago. But at this point, now that she's totally separate kind of from Andrew, she probably sees it as, as long as I keep my mouth shut, this is probably the best I can get right now until, you know.”
2. “there are five other identified victims.”
3. “I don't know if you went over it before I was able to get in the room, but the chat logs that have been posted already are an excellent example of the incremental coercion and grooming that these women have gone through.”
4. “Just remember that people who are self-identified Team Matrix always bring receipts, okay? Because what Tate banks on is you just believing what he's saying. And now and then, he'll show you a potentially fake screenshot of a huge financial deposit or Bitcoin or something.”
5. Now that Irina/Vivian is back in town, it's time to remind you that Andrew (age 25*) started dating/grooming her at approx age 14-15yo.”

6. "Andrew & Tristan Tate are grooming r^pists who abuse women. They learned this ghetto skill from their ain't sh^t black daddy. @Cobratate and @TateTheTalisman are going to spend the rest of their lives in jail soon."
7. "Please take a little bit of time to read this thread where @CrayonMurders debunked lie, after lie, after lie of the @TateNews_ propaganda account, who is calling himself the only source of reliable information about the criminal cases of the pedophile sex traffickers."
8. "The Tates have mentioned me in court documents for their Florida case. I assume Andrew didn't like this video I made (that's been seen over 32 million times) exposing that he made a sex tape with a minor"
9. "If you paid Andrew for the PHD course, & used it, you should probably talk to a few lawyers. If you aren't already in jail... 🤔"
10. The Right Wing grift, ladies and gentlemen. These influencers who ignore plain evidence and mute comments, block out those calling them out ARE BEING PAID 💰👤 by the Tates.
11. "Andrew Tate is cornered. -Either he doesn't follow through with his threat to sue Drew proving he knows he had sex with a minor. -He does sue & the proof comes out in court he had sex with a minor. Either way the world will know Andrew Tate had sex with a minor."
12. "@CensoredMen @Cobratate Everything Tate says here is a lie. For women in 2013 - 15 accused Tate of raping and pummelling them. They went to the police. The investigation took until 2019, by which time Tate had fled to Romania. His story of the police catching the women plotting to get his money and..."
13. "With Andrew Tate's temperament & network/fans, can you ever really escape? In 2012, this girl would be a MINOR (14/15). Minors are not prostitutes. They are CHILDREN. "
14. "After almost 7 years, it has now been revealed that Andrew Tate was removed from the Big Brother house due to a sexual assault and physical abuse investigation that had been shared with producers the day after he appeared on the show, after several women spoke up"
15. "Andrew Tate is a pedophile rapist who bragged about fucking a 16 year old on camera and is caught in an audio recording talking about how much he enjoyed raping a woman. Tucker Carlson: TIME TO JUMP ON A PLANE AND FLY TO ROMANIA TO MEET THIS LEGEND"
16. "It's pretty insane that Andrew Tate still has fans/supporters after admitting he was dating a 15 year old when he was 26 and that he's recently been defending a convicted child rapist. Wild times indeed. This man truly represents the peak of masculinity."
17. @lucymarionbrown @Cobratate He was telling us she was 16 when he had her start doing webcam and they forged an ID for her
18. "YOU WILL ALL RUE THE DAY YOU SAID THAT VIVIAN WAS 14. Once I fabricate a fake passport for her, beat her and force her to lie about her age in front of a judge, you're all going to look very fucking stupid, and will pay me."
19. "🔴 REMINDER The pedophile sex trafficker is still selling on Amazon a blasphemous Bible where he is mocking Jesus Christ. His respect for God is a lie and he is using religion(s) to fool idiots about his morals."
20. "How can you sue someone for calling you a "pedo rapist" because they did the math on what you've said over the years and worked out that you released a sex tape with a 14 year old child @Cobratate?"
21. "🔴 BREAKING NEWS 🔴 @elonmusk's X just today tagged as Hateful Conduct this tweet of the sex trafficker Andrew Tate that I used as example. The rest of his tweets are still untagged for Hateful Conduct."
22. "I'll be going live with @DrewPavlou & @CrayonMurders discussing the viral video (over 20 MILLION VIEWS!) EXPOSING Andrew Tate made a sex tape beating a minor & Tate's threat to take Drew to court in response!"

224. All of these defamatory statements made by Players were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of

fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

225. Sharon 36:

1. "Who is the victim [referring to Jane Doe]... Great job on making her the victim again, I hope you inspired to continue to go after victims to make yourself feel like a better person" [Andrew Tate and Tristan Tate] [Emphasis Added].
2. "Andrew Tate's PR boy/witness intimidator... What is his involvement with Tate Pledge" [Referring to a man who researched the alleged false allegations against the Tate Brothers and implies that he is involved helping Andrew Tate and Tristan Tate use their legitimate charity for fraudulent purposes.] [Emphasis Added].
3. "...this [Andrew Tate] man particularly targeted extremely vulnerable women who either don't have the education level, came from poor families who have money problems, and brought them over and took advantage of them." [Emphasis Added].
4. "that's automatically targeting and for for trafficking issues... And it's not just human trafficking, organized crime."
5. "And that's one of the main reasons why that was a huge issue here for that poor victim."

226. Sharon 36 is an admitted resident of the State of Florida and regularly comments and reposts defamatory information about the Tate Brothers' and their ongoing civil case in Palm Beach County, Florida.

227. All of these defamatory statements made by Sharon 36 were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

228. JustMe:

1. "...that we all make ourselves more aware of what all this is that we educate women about this lover boy method..."
2. "Everybody needs to remember that these girls were not only used for sex trafficking purposes... the girls to run documents and commit other offenses and different things like that"
3. "So some of these girls you see defending them are defending them because they're just absolutely terrified too... they they were used in nefarious ways"
4. "They're doing this to show any woman who's thinking about coming forward against them in any case civil or criminal we can ruin your life just like we're ruining her life..."
5. "He [Andrew Tate] recruits and deceives and transports them to Romania and then Georgia and Luana are the ones that try to coerce them into webcam."
6. "They [women] have no ability to go anywhere..."
7. "They had there was a method put in place to recruit and exploit these women..."
8. "they're going to try to coerce you to work in pornography."

9. "These kids are just giving their money away [to the War Room] for things they can learn to do for free or being funneled into higher levels of crime favors, blackmailing and things like that."
10. Hey Asshole! By the time you get here... according to Trump you should eligible for the death penalty. Let that sink in... Ps – I changed my views on the death penalty this year. Some people God DOESNT want roaming his earth & violating those unable to defend themselves." [Reposting a Sheep posting with a face of Andrew Tate] [Emphasis Added].
11. "Exposing Andrew Tate's scams."

229. All of these defamatory statements made by JustMe were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

230. Matthew Jury:

1. "Today we gave a press conference in Romania to show solidarity with victims of Andrew Tate's alleged crimes from the U.S. and worldwide, and to highlight the campaign of harassment and intimidation they have recently been subjected to by Tate's lawyers and followers."
2. Following yesterday's press conference by the victims of Andrew Tate's alleged crimes, which was ambushed by his legal team and cronies..."
3. If you wish to support the victims of Tate's alleged crimes and their campaign for justice, you can do so here."
4. "... the victims will not be bullied into silence and they will not rest until they see Tate un court, held to account for his alleged crimes, and ensure justice is done"
5. "Their campaign to harass and intimidate the women standing up to them really isn't going well..."
6. "What this statement shows is that there are victims of Tate's alleged crimes..."
7. "The Real World app is a pyramid scheme which exploits teens..."⁷⁶
8. "Victims of Andrew Tate say they were left with no option but to take civil action, after a flawed police investigation"

231. The posts include describing Andrew Tate as Ted Bundy, a known serial killer and rapist. Mr. Jury has appeared in interviews with an X account user that has likened Andrew Tate to Charles Manson, a prolific convicted cult leader. In addition, Mr. Jury has likened Mr. Andrew Tate to Robert Mugabe and Vladimir Putin.⁷⁷

232. Furthermore, Mr. Jury has recklessly accused the Plaintiffs' legal team, including the undersigned, of harassment and intimidation, by representing our clients and availing

⁷⁶ This was originally a posting by McCue Jury & Partners LLP, which was reposted by one of the prominent figures of the Team Matrix conspiracy, Murdered by Crayons.

⁷⁷ See a true and correct copy of the posting by Mr. Jury.

themselves to all remedies under the law, including a legal lawsuit for defamation and other torts.

233. Mr. Jury does this even though it has publicly come to light that one of the “alleged victims” being sued was instructing other people to fabricate evidence.

234. Mr. Jury further publicly accused and continues to accuse Tate attorneys of being “complicit in what appears to me to be a criminal conspiracy to harass and intimidate a victim and witness in a criminal prosecution and ongoing investigations.”⁷⁸

235. Mr. Jury attempts, albeit ineffectively, to distance himself from claims of defamation by using the word “alleged” in some postings, and at times, but he states with certainty there are “victims” of the Plaintiffs and that the Plaintiffs have committed crimes.

236. Mr. Jury’s statements are still maliciously defamatory in nature because no court of competent jurisdiction has ruled either of the Plaintiffs have committed any crime and, thus, there can be no victims other than “alleged victims,” some of which have obviously falsified crimes and “evidence” against the Plaintiffs for compensation or revenge.

237. Mr. Jury has engaged in a malicious and reckless defamation campaign, with what appears to be a vendetta, against the Plaintiffs to cause as much harm as possible with an intent to sway public opinion against the Tate Brothers. Mr. Jury’s participation in the defamation campaign against the Tate Brothers has certainly surpassed “simply doing our job.”⁷⁹

238. Mr. Jury openly boasts about interrupting the Plaintiffs’ lawful business income. He publicly boasted that he and his law firm were responsible for having an Application of the

⁷⁸ Mr. Jury appears to believe that clients legally availing themselves to civil actions against false accusers (who planned to fabricate evidence and get rich off their false story) is a criminal conspiracy. Such a “conspiracy” theory is better suited for fantasy films.

⁷⁹ Mr. Jury alleged in the press conference in Romania that his law firm was threatened with legal proceedings for doing their job; however, Mr. Jury has far exceeded what is just doing his job and has entered into a conspiracy with many anonymous social media accounts to defame the Plaintiffs.

Plaintiffs removed from the Apple App Store and Google Play Store (collectively “App Stores”).⁸⁰

239. Mr. Jury stated in an X posting “Today @Apple, thanks to the work of the team @mccuejury and @Gadget44027447 (Gadget), has agreed to remove Andrew Tate’s Real World Portal from the App Store...”

240. Mr. Jury in the reposting of his law firm’s post, even referred to the Application as “an illegal pyramid scheme.”⁸¹ Taking the definition utilized by the FBI, the Application removed from the App Stores, does not even come into the same realm of what Mr. Jury and his firm maliciously and recklessly allege.

241. Attorney Dani Pinter, of NCOSE, often reposts these defamatory X postings from Matthew Jury.

242. All of these defamatory statements made by Matthew Jury were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate.

243. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

244. Upon information and belief, NCOSE and McCue Jury & Partners knew about the ongoing defamation campaign against the Tate Brothers.

245. Eleanor Gaetan:

1. “Read the Truth #TateTraffickers”
2. “Hey @NYTimes: Tate Brothers TRAFFICKED her. It wasn’t “sex work,” a term invented by pimps. @NCOSE”

⁸⁰ See attached posting of Mr. Jury boasting about costing the Plaintiffs Money attached hereto as Exhibit HH.

⁸¹ The FBI defines Pyramid Scheme as “Use money collected from new victims to pay the high rates of return promised to earlier investors; Payouts give the impression of a legitimate, money-making enterprise behind the fraudster’s story; and in reality, investors are the only source of funding.

246. These defamatory statements were made in addition to the malicious defamatory statements previously noted.

247. All of these defamatory statements made by Gaetan were in the context of a public posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

248. Lucy Brown:

1. "Shame on anyone still supporting these rapists."
2. "andrewtateisarapist.com" [this linked to Matthew Jury's crowdfunding page]

249. All of these defamatory statements made by Brown were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

250. Miss M&M:

1. "The fact it had to come this far says everything about the Tate Brothers. Master con artists, sadistic, narcissistic sociopaths who lead the cult of Tateism. What you see here is Socioterrorism on full throttle!"
2. "Can somebody convince Jasmina to come forward as a victim. So the fact Tate trafficked her ass is public news now."

251. All of these defamatory statements made by Miss M&M were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, accuse them of fraudulent business dealings, maliciously defame the Tate Brothers, and impugn their credibility.

252. Bonfilio:

1. "Just acknowledge this is a man, beating the shit out of a 15 year old girl who can NOT [sic] consent to role 'role play'"
2. "This is why Tate prefers hitting women."
3. "Nope, I'm going to talk about Tate a LOT more. Honestly, way too much. He's a fuckin pedophile pimp..."
4. "Don't complain about pedophilia and and sex trafficking because feminism is a more important issue."
5. "Pick your side and stay there... without the people who apologize for sex trafficking pedophiles in it."
6. "There are about 40 women who have given testimony against the Tates."
7. "Andrew Tate is on tape abusing a minor."
8. "Pedophilia is pedophilia, full stop... apply this shit to Andrew Tate."
9. "Sorry about clout chasing off the sex trafficking of children is where I get the ick."
10. "Good Morning to everyone who does not beat women and little girls..."

253. All of these defamatory statements made by Bonfilio were in the context of a Video, Space or Posting dedicated to Andrew Tate and Tristan Tate. The comments intentionally and recklessly accuse the Tates of several crimes, having victims of crimes, maliciously defame the Tate Brothers, and impugn their credibility.

254. Upon information and belief, Bonfilio has himself been arrested for assault and battery on a person more than 60 years old or disabled.⁸²

255. Bonfilio regularly started reposting Team Matrix content by way of X.⁸³

256. To defend themselves against these continuing outlandish intentional, malicious, and reckless allegations, the Tate Brothers have had to hire teams of lawyers worldwide to protect and defend their personal and professional interests against this manifestly unjust attack.

257. Defendants are not media defendants, and therefore Plaintiffs are not required to provide the Defendants with pre-suit notice before instituting this action. Plaintiff has either satisfied all conditions precedent to bringing this lawsuit or such conditions have been waived or excused by Defendants' conduct.

⁸² See Exhibit II containing a screenshot of Bonfilio's arrest.

⁸³ See Exhibit JJ containing the defamatory statements of Bonfilio and some repostings of Team Matrix to further the conspiracy to defame.

FIRST CAUSE OF ACTION

Defamation: JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JUNE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M DOE a/k/a @mireillemannee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot

258. The Tate Brothers re-allege and restate paragraphs 1-257 as though fully stated herein and allege that those facts, as pleaded, demonstrate that JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JUNE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M DOE a/k/a @mireillemannee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot are guilty of Libel and Slander against Andrew and Tristan Tate.

259. Under Florida law, the following four elements must be met to satisfy a claim for defamation: (i) the defendant published a false statement; (ii) about the plaintiff; (iii) to a third party; and (iv) the falsity of the statement caused injury to the plaintiff. *Border Collie Rescue v. Ryan*, 418 F.Supp.2d 1330, 1348 (M.D.Fla. 2006).

260. PUBLICATION OF FALSE STATEMENTS TO THIRD PARTIES: Beginning in July of 2023 and in an ongoing fashion, JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JUNE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M

DOE a/k/a @mireillemantee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot posted numerous defamatory statements.

261. Plaintiffs have filed a substantial lawsuit outlining a significant number of exculpatory statements, which shows their innocence, that they have been maliciously defamed, and shows that some of the alleged victims, which Defendants often refer to as conclusive victims, lied and have a significant history of falsely accusing people of crimes.

262. Moreover, other “alleged victims,” designated in Romania, have come forward by lawsuit, affidavit or other sworn statement indicating that the Tate Brothers have done nothing wrong to them to be designated as alleged victims.

263. Despite this reality and the fact that Defendants had knowledge of Jane Doe’s long history of lying and her propensity to lie by way of multiple lawsuits filed against her containing such information, Defendants knowingly, intentionally, purposefully, and with reckless disregard for the truth published false statements via various social media accounts, including X (f/k/a Twitter) and YouTube.

264. As of the day this Complaint was filed, the Defendants are still trying to help “turn” people and harm the Tate Brothers. Defendants have taken no steps to correct their intentional, reckless, and malicious statements intended to harm the Plaintiffs.

265. INJURY TO PLAINTIFF: As a direct consequence of the publication of the false statements, which, as shown above, were repeated at a minimum recklessly and vindictively to third parties, T. Tate and A. Tate sustained serious personal, financial, and professional injuries. The publication of these false statements directly contributed to T. Tate and A. Tate’s censorship on social media platforms like Twitter and Instagram, on which the Tate Brothers have millions of followers, causing them to lose hundreds of thousands of dollars.

266. By repeating, publishing, and disseminating the defamatory statements to third parties, Defendants damaged the Tate Brothers' personal and business relationships by imputing conduct incompatible with the proper exercise of their lawful businesses and other ventures, which they have long since relied upon to generate income. This caused them to lose hundreds of thousands of dollars.

267. By repeating, publishing, and disseminating the defamatory statements, the Defendants damaged the Tate Brothers' personal and business relationships, resulting in losses into the hundreds of thousands of dollars, reputational and economic losses.

SECOND CAUSE OF ACTION

Defamation Per Se: JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JUNE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M DOE a/k/a @mireillemannee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot

268. The Tate Brothers re-allege and restate paragraphs 1-257 as though fully stated herein.

269. This is an action by the Tate Brothers against JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JUNE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M DOE a/k/a @mireillemannee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot for libel and slander per se.

270. Under Florida law, the following four elements must be met to satisfy a claim for defamation: (i) the defendant published a false statement; (ii) about the plaintiff; (iii) to a third party; and (iv) the falsity of the statement caused injury to the plaintiff. *Border Collie*

Rescue v. Ryan, 418 F.Supp.2d 1330, 1348 (M.D.Fla. 2006). Florida law recognizes “per se” cases of defamation under certain circumstances. Per se defamation presumes damages if one of the following subjects is met: (i) impugns a person’s professional character or standing; (ii) states or implies that an unmarried person is unchaste (e.g., is sexually active); (iii) states or implies that a person is infected with a sexually transmitted disease; or (iv) states or implies that the person has committed a crime of moral turpitude (e.g., theft or fraud).

271. PUBLICATION OF FALSE STATEMENTS TO THIRD PARTIES THAT DIRECTLY IMPUGNED CHARACTER, PROFESSIONAL STANDING: Since July 2023, the Defendants have made several defamatory statements on social media that directly impugned the character and professional standing of the Plaintiffs by conclusively accusing them of serious crimes including rape, human trafficking, forming a criminal organization, business fraud, among other crimes.

272. Plaintiffs have filed a substantial lawsuit outlining a significant number of exculpatory statements, which shows their innocence, that they have been maliciously defamed, and shows that some of the alleged victims, which Defendants often refer to as conclusive victims, lied and have a significant history of falsely accusing people of crimes.

273. Moreover, other “alleged victims,” designated in Romania, have come forward by lawsuit, affidavit or other sworn statement indicating that the Tate Brothers have done nothing wrong to them to be designated as alleged victims.

274. Despite this reality and the fact that Defendants had knowledge of Jane Doe’s long history of lying and her propensity to lie by way of multiple lawsuits filed against her containing such information, Defendants knowingly, intentionally, purposefully, and with

reckless disregard for the truth published false statements via various social media accounts, including X (f/k/a Twitter) and YouTube.

275. These false statements directly impugned the character and professional standing of the Tate Brothers, which the Defendants communicated to the world on social media. At no point did the Tate Brothers engage in human trafficking of Jane Doe or anyone ever, nor had the Tate Brothers ever been charged with the felony of human trafficking by any jurisdiction anywhere in the world prior to the false statements of criminal guilt being perpetuated by Defendants.

276. Plaintiffs have filed a substantial lawsuit outlining a significant number of exculpatory statements, which shows their innocence, that they have been maliciously defamed, and shows that some of the alleged victims, which Defendants often refer to as conclusive victims, lied and have a significant history of falsely accusing people of crimes.

277. Moreover, other “alleged victims,” designated in Romania, have come forward by lawsuit, affidavit or other sworn statement indicating that the Tate Brothers have done nothing wrong to them to be designated as alleged victims.

278. Despite this reality and the fact that Defendants had knowledge of Jane Doe’s long history of lying and her propensity to lie by way of multiple lawsuits filed against her containing such information, Defendants knowingly, intentionally, purposefully, and with reckless disregard for the truth published false statements via various social media accounts, including X (f/k/a Twitter) and YouTube.

279. As of the day this Complaint was filed, the Defendants are still trying to help “turn” people and harm the Tate Brothers. Defendants have taken no steps to correct their intentional, reckless, and malicious statements intended to harm the Plaintiffs.

280. INJURY TO PLAINTIFF: As a direct consequence of the publication of the false statements, which, as shown above, were repeated at a minimum recklessly and vindictively to third parties, T. Tate and A. Tate sustained serious personal, financial, and professional injuries. The publication of these false statements directly contributed to T. Tate and A. Tate's censorship on social media platforms like Twitter and Instagram, on which the Tate Brothers have millions of followers, causing them to lose hundreds of thousands of dollars.
281. By repeating, publishing, and disseminating the defamatory statements to third parties, Defendants damaged the Tate Brothers' personal and business relationships by imputing conduct incompatible with the proper exercise of their lawful businesses and other ventures, which they have long since relied upon to generate income. This caused them to lose hundreds of thousands of dollars.
282. By repeating, publishing, and disseminating the defamatory statements, the Defendants damaged the Tate Brothers' personal and business relationships, resulting in losses into the hundreds of thousands of dollars, reputational and economic losses.

THIRD CAUSE OF ACTION

Civil Conspiracy: JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JANE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M DOE a/k/a @mireillemannee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot

283. The Tate Brothers re-allege and restate paragraphs 1-257 as though fully stated herein.
284. This is an action by the Tate Brothers against Defendants, for civil conspiracy. Under Florida law, the following four elements must be met to satisfy a claim for civil conspiracy:
- (i) a conspiracy between two or more parties; (ii) to do an unlawful act or to do a lawful act by unlawful means; (iii) the doing of some overt act in pursuance of the conspiracy; and (iv)

damage to the plaintiff as a result of the acts performed pursuant to the conspiracy. *Walters v. Blankenship*, 931 So. 2d 137, 140 (Fla. Dist. Ct. App. 2006).

285. CONSPIRACY BETWEEN TWO OR MORE PARTIES: Defendants conspiracy against the Tate Brothers is ongoing and has been since 2023. As demonstrated above, Defendants conspired to intentionally harm the Tate Brothers and maliciously defame the Tate Brothers.

286. Since July 2023, Defendants have committed additional acts in furtherance of the conspiracy, including creating anonymous online accounts that have engaged in a targeted campaign against the Tate Brothers' interests in Florida and across the world.

287. The Defendants had several public and secret meetings in furtherance of their conspiracy as evidenced above.

288. During these discussions, Defendants planned and spoke about the substance of their conspiracy to spread online false information regarding the Tate Brothers personally and their businesses, as evidenced above.

289. TO DO AN UNLAWFUL ACT AND THE DOING OF SOME OVERT ACT IN PURSUANCE OF THE CONSPIRACY: Defendants took an overt act in furtherance of their conspiracy by outlining a systematic plot to defame the Tate Brothers, harm the Tate Brothers financially and personally, and use the Tate Brothers' fame to propel themselves to financial windfalls by gaining a large following.

290. DAMAGE TO THE PLAINTIFF: In addition, as shown above, the Defendants conspired to inflict harm upon the Plaintiffs, financially, reputationally, and personally, by engaging in the conspiracy to defame the Tate Brothers. By conspiring to defame the Tate Brothers and posting defamatory information online, the Tate Brothers have been economically damaged because they suffered material losses, between the lost property that was the basis for the

conspiracy, lost time at work as a result of being distracted, and the economic and reputational damages sustained to their various multimillion dollar businesses because of Defendants' defamation.

FOURTH CAUSE OF ACTION

Commercial Defamation: JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JUNE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M DOE a/k/a @mireillemannee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot

291. The Tate Brothers re-allege and restate paragraphs 1-257 as though fully stated herein.
292. This is an action by the Tate Brothers and their various businesses, including the War Room and Hustlers University affiliations, for commercial defamation, specifically libel and slander against Defendants. The Plaintiffs own many businesses and are their own brand for social media influencing.
293. Under Florida law, the following three elements must be met to satisfy a claim for commercial defamation: (i) the statement was false; (ii) the person making the statement intends for you to suffer financial loss and your business does suffer loss, resulting in actual damages; and (iii) the person making the statement knew it was false or did not have any concern whether it was true. See Business Disparagement in Florida, Trevor Brewer (May 16, 2019).
294. PUBLICATION OF FALSE STATEMENTS TO THIRD PARTIES THAT RESULTED IN FINANCIAL LOSSES TO BUSINESS: Defendants knowingly, intentionally, and purposefully, with reckless disregard for the truth, published false statements alleging grave crimes against her by the Tate Brothers, including "human traffick[ing]," "falsely

imprisoning,” and sexually assaulting them. These false statements directly impugned the character and professional standing of the Tate Brothers, which Defendants communicated to the entire world via the internet. At no point did the Tate Brothers engage in fraud, human trafficking, false, imprisonment, or sexual assault of anyone ever, nor had the Tate Brothers ever been charged with the felony of human trafficking by any jurisdiction anywhere in the world.

295. As detailed at length above, Defendants are in a scheme to defame and financially harm the Tate Brothers.

296. KNOWLEDGE AND/OR DISREGARD OF FALSITY AND INJURY TO PLAINTIFF:
As a direct consequence of the publication of Defendants’ false statements, T. Tate and A. Tate sustained serious personal, financial, and professional injuries. The publication of these false statements directly contributed to T. Tate and A. Tate’s further censorship on social media platforms like Twitter and Instagram, on which the Tate Brothers have millions of followers that they predominantly rely upon to market their War Room, Hustlers University, and other business ventures.

297. Furthermore, imputing conduct incompatible with the proper exercise of the Tate Brothers’ lawful business, trade, and profession as major social media influencers with worldwide followings, and businessmen, Defendants damaged their relationship with many third-parties, caused a criminal investigation and seizure of business assets by a foreign government, and injured them in their trade and profession, among other critical reputational and economic losses.

RESERVATION OF RIGHTS

Plaintiff reserves the right to amend this Complaint upon discovering additional facts, including adding a claim for punitive damages against one or more Defendants.

DEMAND FOR JURY TRIAL

Plaintiffs' demand a trial by jury on all issues so triable.

RELIEF SOUGHT

WHEREFORE, Plaintiffs ANDREW TATE and TRISTAN TATE pray for judgment against each defendant, jointly and severally, as follows:

WHEREFORE, Plaintiffs, ANDREW TATE and TRISTAN TATE pray that this Court will enter judgment of liability against Defendants, JANE DOE a/k/a @Therealsuzywyn1, MARY DOE a/k/a @Avalon1T, NATHAN LIVINGSTON a/k/a @TheMilkBarTV, JUNE DOE a/k/a @Mad_About_Sheep, JACK DOE a/k/a @Gadget44027447, JAMES DOE a/k/a @C_S_SKEPTIC, ANNE DOE a/k/a @THOTSANDPLAYERS, ROSE DOE a/k/a @frmthebroknside, EMILY DOE a/k/a @usamabroad, Matthew Jury, Eleanor Gaetan, M&M DOE a/k/a @mireillemannee, LUCY BROWN a/k/a @lucymarionbrown, and Zachary Bonfilio a/k/a @misfitpatriot and award damages including attorneys' fees and costs where authorized by statute, pre- and post-judgment interest, and all other relief that this Court deems just and proper.

Respectfully submitted this Eighteenth day of March 2025.

/s/ Thomas Maniotis, Esq.

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