

JAN 24 2019

JULIA S. DUNDLEY, CLERK
BY: A. R. R.
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
_____ DIVISION

Scott, Melinda)
_____))
_____))
Plaintiff(s),)
_____))
v.)
_____))
Moon, Joshua et al)
_____))
_____))
Defendant(s).)
(Enter the full name(s) of ALL parties in this lawsuit.)
Please attach additional sheets if necessary).)

Civil Action No.: 2:19cv5
(To be assigned by Clerk of District Court)

COMPLAINT

PARTIES

1. List all Plaintiffs. State the full name of the Plaintiff, address and telephone number. Do the same for any additional Plaintiffs.

a. Plaintiff No. 1

Name: Melinda Scott
Address: PO Box 1133-2014PMB87, Richmond, VA 23218
Telephone Number: 540-692-2342

b. Plaintiff No. 2

Name: _____
Address: _____
Telephone Number: _____

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

a. Defendant No. 1

Name: Joshua Moon
Address: 3750 Don Janeal Rd., Pensacola, FL 32526

b. Defendant No. 2

Name: Brian Zaiger
Address: 116 Lafayette St., Salem, MA 01970

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case. Federal courts also have jurisdiction over cases where the United States is a Defendant.

3. What is the basis for federal court jurisdiction?

☐ Federal Question ☒ Diversity of Citizenship ☐ Government Defendant

4. If the basis for jurisdiction is Federal Question, which Federal Constitution, statutory or treaty right is at issue? List all that apply.

n/a

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff No. 1: Melinda Scott State of Citizenship: Virginia (VA)

Plaintiff No. 2: _____ State of Citizenship: _____

Defendant No. 1: Joshua Moon State of Citizenship: Florida (FL)

Defendant No. 2: Brian Zaiger State of Citizenship: Massachusetts (MA)

Attach additional sheets of paper as necessary and label this information as paragraph

5. Check here if additional sheets of paper are attached. ☐

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Do not give any legal arguments or cite cases or statutes. Each paragraph must be numbered separately, beginning with number 6. Please write each single set of circumstances in a separately numbered paragraph.

6. _____

PLEASE SEE ATTACHMENT (10 TYPED PAGES)

a. Invasion of Privacy: Appropriation (Florida (FL) Defendant, Joshua Moon)

- (i) Defendant Joshua Conner Moon¹ is the sole owner of a business called “Lolcow, LLC”. Between March 1, 2017 and September 22, 2017² Lolcow, LLC was a registered business in the State of Florida. Lolcow, LLC publishes articles on a website forum called “kiwifarms.net”. Between March 1, 2017 and the date of this pleading, kiwifarms.net contains a copyright notice with the symbol “Lolcow, LLC” at the footer of the page³. The computer used by Joshua Conner Moon to publish for Lolcow, LLC and kiwifarms.net is controlled from the State of Florida. Lolcow, LLC sometimes uses an IP scrambler to hide the IP from which they send emails.
- (ii) On March 14, 2017 Lolcow, LLC published an article on kiwifarms.net which included the full legal name and a portrait of the Plaintiff. The article also included links to videos created on YouTube by a New York resident named Andrew Carlson. The video links included the full legal name and portrait of the Plaintiff. The article was published in Eastern Standard Time. The article did not bear a time stamp. Since March 14, 2017 the article is live and accessible 24 hours a day to an international audience on all different time zones except in countries that censor American⁴ websites. In the aforementioned published article the Plaintiff was ridiculed for (1) associating with Jewish religion and culture (2) associating and marrying a formerly incarcerated person (3) (allegedly) committing adultery (4) having a “stalker” and (5) (allegedly) being married more than 2 times.
- (iii) Defendant Moon also used the Plaintiff’s legal name for articles he published on kiwifarms.net on April 2, 2017, July 6, 2017, July 7, 2017 and July 13, 2017 for an international audience on all different time zones except in countries that censor American⁵ websites. There is no time stamp available for any of the articles.. After the expiration of his business license, Joshua Moon published articles on kiwifarms.net using the Plaintiff’s name on June 22, 2018, August 24, 2018, December 12, 2018, and December 14, 2018 for an international audience on all different time zones except in countries that censor American⁶ websites. There is no time stamp available for any of the articles.

¹ Plaintiff has never met Defendant Joshua Moon in person. Joshua Moon is documented in third-party newspapers as an actual person. He has been sued in British courts under the name “Joshua Moon”. Plaintiff can reasonably assume that Joshua Moon is an actual person. He has a registered business which is documented in the State of Florida.

² After being sued in a state court by Plaintiff Scott in June 2017 for appropriation, Joshua Moon did not renew his business license. The case was filed in a Circuit Court and dismissed. No damages were collected on behalf of the Plaintiff.

³ Kiwifarms.net

⁴ More specifically, the United States of America

⁵ Id

⁶ Id

- (iv) At no time before the publication of any of the articles bearing the Plaintiff's name and portrait did Lolcow, LLC or Joshua Moon ask permission from the Plaintiff to use her name or portrait for his business. On April 2, 2017 the Plaintiff discovered the March 14, 2017 article. The Plaintiff sent an email letter on April 2, 2017 to Joshua Moon to cease and desist from publishing content using her legal name and portrait. Plaintiff Scott also demanded the removal of all content bearing her legal name and photos to be removed from kiwifarms.net. Defendant Moon responded to the email within minutes using an administrative email from Lolcow, LLC. In the email he confirmed that (1) he was the person behind the keyboard typing as an administrator of Lolcow, LLC (2) that his business was in existence (3) he owned and operated the business Lolcow, LLC and its website kiwifarms.net (4) he was registered by an agent established in the State of Florida (5) that he knew the difference between libel and slander (6) that he operates under a user name called "Null" and (7) that he refused to remove any article, content, name or photo on kiwifarms.net relating to the Plaintiff.
- (v) At no time since April 2, 2017 has the Plaintiff ever indicated to Lolcow, LLC, or Joshua Moon, ooperator of kiwifarms.net, that it had her permission to use her name, likeness or portrait for Lolcow, LLC.
- (vi) Defendant Joshua Moon has used the articles published on kiwifarms.net about the Plaintiff for his own personal gain. Defendant Moon seeks notoriety and monetary gain from Lolcow, LLC. He takes in money and donations for his business Lolcow, LLC. He uses articles to keep his forum relevant to his subscribers and followers on kiwifarms.net and YouTube. Defendant Moon has published in writing that his website kiwifarms.net is seen by thousands and receives millions of hits a day. He has 1000s of subscribers on YouTube.
- (vii) On July 7, 2017 Defendant Moon also published on kiwifarms.net a headshot photo of the Plaintiff falling on the floor outside of a boxing ring. The picture was clear enough to ascertain that the cropped head on a cartoon body was the Plaintiff. The photo was published for an international audience in all localities around the world and in all time zones except where American websites are censored. There is no time stamp available on the photo's publication location on kiwifarms.net.
- (viii) None of the information in any of the articles on kiwifarms.net referencing Plaintiff Scott is of legitimate concern to the public. None of the information in any of the articles published on kiwifarms.net about Plaintiff Scott is privileged. Plaintiff Scott is not a person holding public office.

b. Invasion of Privacy: Publication of Private Facts (FL Defendant Moon)

(ix) In the March 14, 2017 article on kiwifarms.net Defendant Moon published an announcement of the Plaintiff's marriage to her legal spouse (husband)⁷. The article published links to defamatory⁸ newspaper articles and information about her spouse's legal problems and incarceration⁹ in the State of California. The intent of announcing her marriage to her spouse was done with the intent to embarrass and shame the Plaintiff. It is not of legitimate concern to the public who the Plaintiff chooses to marry. Who the Plaintiff marries is not privileged information. Plaintiff Scott finds the international publication of her marital associations as highly objectionable.

(x) The article published by kiwifarms.net included details regarding a New York resident who the Plaintiff had obtained a Protective Order against on February 19, 2017. Although the Protective Order was issued by a Circuit Court in Virginia, the Protective Order was not intended to be a public document. As of the date of publication of the article¹⁰ the protective order and knowledge that the Plaintiff was being stalked was private information. The Plaintiff's legal problems with NY resident Andrew Carlson is not of legitimate concern to the public. Information about Plaintiff Scott's legal problems with NY resident Andrew Carlson is not privileged. Plaintiff Scott finds the international publication of her legal problems with NY resident Andrew Carlson as highly offensive and objectionable.

(xi) The article published on March 14, 2017 by Lolcow, LLC has been published with the intent to publish private information that others would see as embarrassing and to lower the opinion of the Plaintiff in the eyes of others. The publication and inclusion of private details about the Plaintiff's legal spouse was added with the intent to embarrass and shame the Plaintiff. The article ends with the conclusion that the Plaintiff's spouse is: "an angry guy who is married to this woman¹¹...". The publication and inclusion of private details about her legal problems with Andrew Carlson, resident of NY, was written with the intent of embarrassing the Plaintiff for having a man stalking her. The article ends with the conclusion that "to recap...we have an obsessive, terrifying neckbeard who stalks

⁷ Although Plaintiff Scott did not legally marry her current spouse until 2 weeks after the publication of the article, Plaintiff Scott was deemed "married" by religious customs protected by her First Amendment Rights. Third party private citizens of the United States had knowledge of this religious custom and this became the source of announcing Plaintiff Scott and her husband as "married".

⁸ A newspaper in the California used false allegations made by a third-party as its source of information

⁹ The Plaintiff's spouse was incarcerated under "probable cause". The Plaintiff's spouse was defamed in The Napa Valley Register in the State of California. He was never convicted by trial but opted for a plea bargain under duress for violation of his 8th Amendment rights.

¹⁰ Published by Kiwifarms.net on March 14, 2017

¹¹ the "woman" being reference to Melinda Leigh Scott

the previous two¹² and documents it all for our viewing pleasure”. No time stamp is available on the article published March 14, 2017.

(xii) Plaintiff Scott sees the public disclosure of her legal problems with NY resident Andrew Carlson as highly offensive and highly objectionable. Plaintiff Scott also sees the public disclosure of her husband’s legal problems with California as highly objectionable.

c. Defamation (FL Defendant Moon):

(xiii) Defendant Joshua Moon uses a profile on kiwifarms.net named “Null”. He has positively identified himself in email as “Null”. The choice of photo for the user “Null” is the resemblance of a canine with fangs. Defendant Joshua Moon, using his own personal profile “Null”, has published publicly statements that the Plaintiff (is) (1) “the dumbest person, probably ever”¹³ (2) “really fucking stupid”¹⁴ (3) a “moron”¹⁵ (4) writes like she uses “crayola magic marker”¹⁶ (5) a “slut whore”¹⁷ and (6) “ha[d] like a dozen husbands by age 30”¹⁸. There is no time stamp available on kiwifarms.net. Each of these statements in bullets 1 through 6 have been made for an international audience and can be accessed 24 hours a day anywhere around the world by any person, in any locality, except in countries where internet access to American¹⁹ websites is censored. The statements were made with the intent of casting the Plaintiff in a negative light and to harm her reputation anywhere in the world the comments could take affect. The intent of his defamation was also to lower the opinion of her in the eyes of others. None of Defendant Moon’s statements regarding the Plaintiff’s intelligence, marital relationships or alleged sexual encounters are of legitimate public interest to the public. None of the information published about Plaintiff Scott is privileged. All of the defamatory statements by Defendant Moon about Plaintiff Scott are highly offensive to her.

¹² The article references “the previous two” to include the Plaintiff as “a woman who changes husbands like she changes panties”

¹³ Published by Null profile on March 14, 2017 in a kiwifarms.net article. No time stamp is available.

¹⁴ Id

¹⁵ Id

¹⁶ Another reference to demean the intelligence of the Plaintiff

¹⁷ Statement made by the Null profile in a kiwifarms.net article published December 12, 2018. No time stamp is available on the forum.

¹⁸ Statement made by the Null profile in a kiwifarms.net article published December 12, 2018. No time stamp is available on the forum.

¹⁹ More specifically, the United States of America

e. Malice (FL Defendant Moon)

(xiv) Defendant Joshua Moon defamed the Plaintiff and invaded the privacy of the Plaintiff with willful malice. Defendant Moon acted with the intent to embarrass, humiliate and vilify the Plaintiff. Lolcow, LLC publishes that their mission is to “milk for amusement” the stories and people they post about. In emails and online, Defendant Joshua Moon has used vulgar language toward the Plaintiff. He has emailed and published statements from his own user profile²⁰ labeling the Plaintiff as a (1) “fucking moron” (2) “fucking banshee” (3) “dumb bitch” and (4) “the dumbest person, possibly ever”. Defendant Mr. Moon has spoken about the Plaintiff online in a derogatory manner to cast the Plaintiff in a negative light in front of an international audience in every locality around the world. The publicized and uncensored²¹ articles on kiwifarms.net made about the Plaintiff are misogynistic and anti-Semitic, seeking to vilify the Plaintiff for having matriarchal elements in her family orientation, as well as for identifying with Jewish culture and religion. By choosing not to delete the content on his pages Defendant Moon has willfully reinforced and promoted malicious behavior from his users.

(f.) Invasion of Privacy: Appropriation (Massachusetts (MA) Defendant Brian Zaiger)

(xv) Defendant Brian Zaiger is a resident of Massachusetts²² and owns²³ a wiki website called Encyclopedia Dramatica²⁴. The website has been established since December 9, 2004 and takes in money through the form of donations and advertising.

(xvi) On July 13, 2017 Defendant Brian Zaiger published an article using the Plaintiff's picture. The name used to identify the Plaintiff is “Melinda”²⁵. The forum does not provide a time stamp for the article. The article is available 24 hours a day for an international audience in any time zones except where American²⁶ websites are banned by censorship. The article is labeled as an article which is “part of a series on Jews”.

(xvii) At no time since the publication of the article has Plaintiff Scott ever indicated that Encyclopedia Dramatica has her permission to use the Plaintiff's

²⁰ “Null” profile with canine photo

²¹ Since April 2, 2017 Defendant Moon refused to eliminate any anti-semitic or misogynistic libel by any user on his site

²² A “Brian Zaiger” of “116 Lafayette St” is listed as being arrested in the Salem police reports on February 11, 2018. “116 Lafayette St” matches the address listed for service in *Monsarrat v Zaiger* (see https://www.pacemonitor.com/public/case/20759456/Monsarrat_v_GOTPER606700001_et_al)

²³ As of the date of this pleading Brian Ziager lists himself as the owner of Encyclopedia Dramatica on LinkedIn. *Monsarrat v Zaiger*, a case filed in MA, also verifies that Brian Zaiger was the owner of ED at the time of publication of the article referencing Plaintiff Scott (July 13, 2017)

²⁴ See Massachusetts case *Monsarrat v Zaiger*, Civil Action No. 17-10356-PBS

²⁵ Operating under patriarchal assumptions the article misidentifies the Plaintiff of having absorbed the (former) last name of her legal spouse (husband)

²⁶ The United States of America

portrait or name for Encyclopedia Dramatica. On December 27, 2018 the Plaintiff sent an email to Encyclopedia Dramatica (ED) demanding the removal of the content bearing her name and portrait. On December 28, 2017 Plaintiff emailed Defendant Zaiger to remove the content. Defendant Zaiger denied in email that he was affiliated with the ED website.

(xviii) Defendant Zaiger has used the Plaintiff's portrait and name for his own personal gain. Encyclopedia Dramatica makes money from advertising and donations.

g. Invasion of Privacy: False Light ((MA) Defendant Zaiger)

(xix) Within the same article²⁷ Defendant Zaiger published false statements about the Plaintiff attributing sexual acts to the Plaintiff which are untrue. Defendant Zaiger made the following untrue statements attributing sexual allegations involving the Plaintiff: (1) that the Plaintiff committed sexual acts with a(n) (unnamed) former landlord (2) that the Plaintiff is a former prostitute and (3) that she "sucked dick for rent". The article claims that the information was received by the Plaintiff's "stalker". The other false statement published in the article "according to [the Plaintiff's] stalker" is that the Plaintiff has "four baby daddies"²⁸. The article also falsely states that the Plaintiff has had nine husbands. The statements are highly offensive to Plaintiff Scott.

(xx) Defendant Zaiger also published within the same article²⁹ written statements saying that the Plaintiff (1) was "a horny jewess" (2) "with loose morals" and (3) "incestuous"³⁰. These statements were published with the intent of casting the Plaintiff in a negative light. The statements are highly offensive to Plaintiff Scott. These statements are not "true" because Plaintiff Scott does not subscribe to the same secular and/or religious beliefs that spawned these terms.

(xxi) The Defendant's use of the term "baby daddy" is an attempt to cast shame on the Plaintiff for (1) having matriarchal elements in her family (2) for not having an abortion and/or (3) for not using birth control³¹. All of Defendant Zaiger's terms listed in (ix) and (xx) used to label the Plaintiff were to cast shame on the Plaintiff in front of an international audience in all localities around the world. The intent was also to lower the opinion of her in the eyes of others. Since

²⁷ Published July 13, 2017 on Encyclopedia Dramatica. There is no time stamp available.

²⁸ "baby daddies" is a modern secular term to mean children conceived through sexual acts outside of a legal marriage license

²⁹ Published July 13, 2017 on Encyclopedia Dramatica. There is no time stamp available.

³⁰ The article reads that an alleged relationship with a cousin makes the Plaintiff "incestuous", although marriage between cousins is legal in many states and not prohibited by Judaism. However, the use of the term "incestuous" in context of the article is aimed at casting the Plaintiff in a negative light in front of a secular international audience.

³¹ Since statistically it is reported that the average American female under the age of 40 has had eight (8) sexual partners it can be inferred that Defendant Zaiger is not remarking on the Plaintiff's relationship choices but rather that she has borne children as a result of her relationships with the opposite gender.

it is commonly known that it is a cultural custom for people in the United States to use social media and the internet to investigate people for employment, housing and social reasons, it can be reasonably assumed that publication about a person carries the intent of harming them within their local community and with anyone else who will believe untrue statements and negative statements. The statements published by Zaiger are highly offensive to Plaintiff Scott.

(h.). Invasion of Privacy: Publication of Private Facts (MA Defendant Zaiger)

(xxii) In the article published July 13, 2017 Defendant Zaiger claims that he received information about the Plaintiff from the Plaintiff's "stalker". The article labels the Plaintiff as the "object of his obsession"³². Zaiger also published hyperlinks to the March 14, 2017 article from kiwifarms.net. The intent of the hyperlink and mentioning that the Plaintiff has a man stalking her is with the intent to embarrass the Plaintiff. Plaintiff Scott sees the disclosure of her legal problems with NY resident Andrew Carlson as highly offensive and highly objectionable.

i. Defamation (MA Defendant Zaiger)

(xxiii) The published article by Encyclopedia Dramatica was discovered by the Plaintiff on July 13, 2018. Within said article Defendant Zaiger imputed acts of unchastity to the Plaintiff which are untrue. The article falsely accused the Plaintiff of formerly being a "prostitute" and "suck[ing]" dick for rent". There is no time stamp available on the article. The statements were written for an international audience in all localities around the world, in all time zones, except where American websites are censored. Since it is commonly known that it is a cultural custom for people in the United States to use social media and the internet to investigate people for employment, housing and social reasons, it can be reasonably assumed that publication about a person carries the intent of harming them within their local community and with anyone else who will believe the libel. The libelous statements chosen by Zaiger are highly offensive to Plaintiff Scott.

j. Malice (MA Defendant Zaiger)

(xiv) Defendant Zaiger has acted with intentional malice. The subtitle for the picture that includes the Plaintiff states that the Plaintiff is a "jew on her way to Auschwitz"³³. The intent is anti-Semitic. The statement can also be construed as a death threat or a threat of conspiracy to murder the Plaintiff because she identifies with the Jewish religion and culture. Encyclopedia Dramatica is publicly and commonly known as a less than ethical wiki website that picks targets and slanders them in writing.

³² "his" being a reference to the aforementioned "stalker"

³³ A reference to the historically famous Nazi concentration death camp

(k.) Target audience (FL Defendant Moon and MA Defendant Zaiger)

(xxv). Defendant Joshua Moon controls and operates his computer from Florida. Defendant Zaiger operated his computer from MA. The computer exchange software and internet social media that they are using are Google, YouTube and independent website forums. Each of these software and publishing sites are maintained for an international audience in all localities around the world. The intent of both Defendants is to reach as many people as possible. With an international approach, the Defendants are aiming to bring the largest scope of harm possible to the reputation of their targets. Since it is commonly known that it is a cultural custom for people in the United States to use social media and the internet to investigate people for employment, housing and social reasons, it can be reasonably assumed that publication about a person carries the intent of harming them within their local community and with anyone else who will believe the information and statements.

(m.) Length of time (FL Defendant Moon and MA Defendant Zaiger)

(xxvi) As of the filing of this pleading, the March 14, 2017 article published by Defendant Joshua Moon has been published for more than 600 days. The July 13, 2017 article published by Defendant Brian Zaiger has been published for more than 450 days. Plaintiff discovered the March 14, 2017 article published by Defendant Moon on April 2, 2017. Plaintiff discovered all others articles on kiwifarms.net within 6 months of their publication. Plaintiff discovered the July 13, 2017 article written by Defendant Zaiger on July 13, 2018³⁴.

(n.) Emotional Distress due to Invasion of Privacy and Defamation (Both Defendants)

(xxvii) Due to their invasion of the Plaintiff's privacy both Defendants have caused the Plaintiff substantial emotional distress and grief, more than ordinary every day upset. Defendant Moon has caused the Plaintiff substantial emotional distress since the Plaintiff's discovery of the March 14, 2017 article and all other subsequent articles on kiwifarms.net. Defendant Zaiger has caused the Plaintiff substantial emotional distress since the Plaintiff's discovery of the July 13, 2017 article.

(o.) Harm to Reputation for Invasion of Privacy and Defamation (Both Defendants)

(xxviii) The Plaintiff's legal name is the name she conducts business with others in her local community on behalf of her minor children. Her legal name is the name she bears on her Bachelor's degree diploma and professional trade certificates. The Plaintiff's legal name is the name she uses to conduct business in her local community as well as business across the nation. The Plaintiff has a Copyright with her legal name. The Plaintiff is in the patent process and cannot abruptly change her legal name. Due to the long standing use of her legal name

³⁴ At that time the Plaintiff contacted the Anti Defamation League for assistance in removing the article.

for business, professional and social reasons, the Plaintiff should not bear the burden of changing her name to deter any harm to reputation.

(xxix) Between March 14, 2017 and the current date Defendant Moon has caused harm to the Plaintiff's reputation internationally and locally by defamation of the Plaintiff, by appropriation and by the publication of her private information. The way in which the harm has been caused follows in (xxx) through (xxxiii)

(xxx) Defendant Moon has caused other internet users to hold the Plaintiff under criticism and contempt. Other users on kiwifarms.net have been rallied by Defendant Moon and echoed his defamatory statements³⁵ by calling the Plaintiff a (1) "dumb fucking bitch" (2) "crazy" (3) "stupid" (4) "dumbass" (5) "dumb bitch" (6) "vapid bitch" (7) "dumb" (8) "right ol' bitch" (9) "looney moron" (10) "nuts" and (11) "kike". They have similarly echoed the statements in the kiwifarms.net published article and falsely accused the Plaintiff of having³⁶ (1) a list of husbands (2) "9 husbands" (3) had husbands who have disposed of her (4) "go[es] through so many men in such a short time" (5) "a gigantic whore" (6) is on her "ninth husband" (7) that she stalked an (alleged) ex-husband and (8) that she had sexual acts with a former (unnamed) landlord. Kiwifarms.net publications also circulated from its users false statements that the Plaintiff³⁷ (1) "sucked dick for rent" and (2) had an incestuous relationship with a cousin.

(xxxi) Defendant Moon is also responsible for contributing to the conduct of Defendant Zaiger who published and hyperlinked borrowed content from kiwifarms.net on Encyclopedia Dramatica.

(xxxii) On August 24, 2018 it became apparent that the articles online published by kiwifarms.net were causing more actual harm to the Plaintiff's reputation when statements were made to her by neighbors demonstrating that the articles written by the Defendants brought her under criticism and contempt. On August 24, 2018 the Plaintiff was told by a neighbor that she was a "Hebrew pagan". The same neighbor stated that if she didn't like their³⁸ treatment of her she could leave because "no one wanted her [t]here...because [she] go[es] around suing everyone". The only way the neighbor had knowledge of many of the lawsuits the Plaintiff has been involved in was through the efforts of Lolcow, LLC³⁹.

(xxxiii) On August 24, 2018 a neighbor screamed out at the Plaintiff information that she had read on kiwifarms. At around 6:00PM EST the neighbor shouted within earshot of about 20 neighbors and the Plaintiff the following statement: "is this her boyfriend who is a Pedophile?". The question was derived from a photo

³⁵ The statements that follow are a collective sum of statements in all articles published on kiwifarms.net between March 14, 2017 and the date of this pleading

³⁶ Id

³⁷ Id

³⁸ In using the pronoun "their" the neighbor was referring to a number of apartments that hangs out together on a regular basis

³⁹ Owned and published by Defendant Joshua Moon

on Lolcow, LLC falsely portraying the Plaintiff's legal spouse as a "Pedophile". The actions by Lolcow, LLC to publicly disclose private information and to portray the Plaintiff in a negative light for her choice to associate with her legal spouse (husband) caused the Plaintiff to be brought under criticism and contempt.

(p.) Full scope of harm of Invasion of Privacy and Defamation (Both Defendants)

(xxxiv) The full scope of damage caused by the egregious nature of all the instances of casting the Plaintiff in a negative light, publicizing private information and each act of defamation by Encyclopedia Dramatica can be intrinsically understood and assumed.

(xxxv) The full scope of damage caused by the egregious nature of publication of private information and each act of defamation by Defendant Joshua Moon can be intrinsically understood and assumed.

Attach additional sheets of paper as necessary and label them as Additional Facts and continue to number the paragraphs consecutively. Check here if additional sheets of paper are attached. ☒

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

- 1) INJUNCTIVE RELIEF ORDERING BOTH DEFENDANTS TO REMOVE ALL
ONLINE CONTENT WHICH USES THE PLAINTIFF'S LEGAL NAME, PHOTOS,
PORTRAITS OR LIKENESS
- 2) \$75,500 IN DAMAGES FOR DEFAMATION BY JOSHUA MOON
- 3) \$25,000 FOR APPROPRIATION BY JOSHUA MOON/DAMAGES TO PLAINTIFF
- 4) \$125,000 IN DAMAGES FOR THE PUBLICATION OF PRIVATE FACTS
BY JOSHUA MOON
- 5) \$75,500 IN DAMAGES FOR INFLECTING SUBSTANTIAL EMOTIONAL
DISTRESS ON THE PLAINTIFF (DEF. MOON)
- 6) \$100,000 IN DAMAGES FOR DEFAMATION (DEF. ZAIGER)
- 7) \$125,000 IN DAMAGES FOR PORTRAYING THE PLAINTIFF
IN A FALSE LIGHT (DEF. ZAIGER)
- 8) \$50,000 IN DAMAGES FOR APPROPRIATION (DEF. ZAIGER)
- 9) \$25,000 IN DAMAGES FOR PUBLICATION OF PRIVATE
INFORMATION (DEF. ZAIGER)
- 10) \$25,000 IN DAMAGES FOR INFLECTING SUBSTANTIAL
EMOTIONAL DISTRESS (DEF. ZAIGER)

DEMAND FOR JURY TRIAL:

☐ YES

☒ NO

Signed this 28th day of Dec., 2018.

Signature of Plaintiff No. 1



Signature of Plaintiff No. 2

NOTE: All Plaintiffs named in the caption of the complaint must date and sign the complaint. Attach additional sheets of paper as necessary.