

FILED

MAR 18 2005

FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

**U.S. DISTRICT COURT
CLARKSBURG, WV 26301**

ALLISON WILLIAMS, an Individual,

Plaintiff,

v.

Civil Action No. 1:05cv51

ADVERTISING SEX, LLC, a Limited Liability Company, RAYMOND WILLIAMS, an Individual, PALMBEACH-ONLINE.COM, INC., a Corporation, KENNETH M. BOYD, an Individual, EDITH G. BOYD, an Individual, STEVE BRYANT, an Individual, G.A.M.E., a Business, NICHOLAS CAIN, an Individual, CAIN WEB DESIGN, INC., a Corporation, CHARLIE HINTZ, an Individual, MENTAL SHED, LLC, a Business, CHRIS HARTMANN, an Individual, XOTECK, LLC, a Limited Liability Company, DRP MEDIA, INC., a Corporation, DAVID PETERSON, an Individual, VIDBIDNESS, INC., a Corporation, ERIC RIDLEY, an Individual, PERFORMANCE MARKETING GROUP, INC., a Corporation, DARREN M. MCLAUGHLIN, an Individual, PAMELA L. MCLAUGHLIN, an Individual, ETRAX PRODUCTIONS, a Business, RONALD YATES, an Individual, SERGIO JACUZZI, an Individual, HARHAN CO., a Business, PATRICK J. SMITH, an Individual, ELIZA RAZIA, an Individual, FLI EXOTIC INC., a Business, FROSTYLIPS LLC, a Limited Liability Company, JOSEPH VITAGLIANO, an Individual, WEB TRAFFIC INC., a Business, JOHNATHON LANDON, an Individual, SCOTT MOLES, an Individual, ZORG ENTERPRISES, a Business, CASTLE CO PTY LTD, a Business, THE MOLES TRUST, a Trust, RUSSELL M. MOLES, an Individual, GWENDOLINE E. MOLES, an Individual, GUY BLOMBERG, an Individual, CHRIS BUCKLEY, an Individual, EYEGASMIC ENTERPRISES, a Business, SCOTT RICKETT, an Individual, GENOCIDE PRODUCTIONS, a Business, WEBRESULTZ PTY LTD, a Business, CRAIG BROWN, an Individual, MICHAEL VACIETIS, an Individual, FREDERIC PAPILLON, an Individual, CX, a Business, PETER SMALLWOOD, an Individual, PURPLE SKY

PRODUCTIONS, a Business, FAULADI SINGH, an Individual, MARK VAN HEERDEN, an Individual, CCG GROEP BV, a Business, MANUEL NOTEN, an Individual, NETSAITS BV, a Business, GERCO MARSCH, an Individual, HENRY ROTTINE, an Individual, and JOHN AND JANE DOES 1-3, as identified herein,

Defendants.

COMPLAINT

The Plaintiff, Allison Williams, by and through counsel, Jackson Kelly PLLC, hereby commences a civil action against the Defendants by filing this Complaint pursuant to Rules 3 and 5 of the Federal Rules of Civil Procedure. Ms. Williams asserts as follows:

Introduction

1. In August 2004, as she was preparing for her first semester at the West Virginia University College of Law, Allison Williams received word from a friend that there was a favorable news article about Ms. Williams posted on a newspaper's Internet website. Out of curiosity, Ms. Williams entered her name in an Internet search engine in order to find and observe this article, only to find screens and screens of "hits" for websites alleging that she was the star of a leaked sex tape. Horrified, Ms. Williams entered the first site on the list to investigate. Inside, she found that the offending website directed the user to a trailer of a webcast video of a woman, purportedly Ms. Williams yet depicting a woman Ms. Williams had never seen before, engaging in a variety of sex acts. The websites variously described Ms. Williams as "one dirty beauty queen," "quite the animal," "a sex fiend," and, as set forth below, much worse. Immediately thereafter, Ms. Williams began to receive a torrent of phone calls and emails from friends, family, acquaintances, classmates, and business associates as word spread about the existence of the sex tape allegations.

2. In 2003, Allison Williams won the pageant title of Miss West Virginia and competed in the Miss America pageant, distinctions she earned on the strength of years of hard work in academic and charitable settings.

3. The Defendants in this action are, on information and belief, involved in the commercial sale and promotion of pornographic materials on the Internet. In an effort to capitalize on Ms. Williams' good name and an apparent trend in the commercial viability of "celebrity" pornography videos, the Defendants concocted a scheme to advertise a pornographic video, fraudulently, as depicting Ms. Williams. Some of the Defendants' websites juxtaposed copyrighted pageant photographs of Ms. Williams with images from the sex tape trailer. There is absolutely no truth to the Defendants' libelous and defamatory misrepresentations; Ms. Williams is not depicted in this, or any other, pornographic video.

4. Meanwhile, as the Defendants profit from their false association with a former Miss West Virginia, Ms. Williams has strained to mitigate the enormous, and ever expanding, damage to her reputation. Initially, she sent emails to whomever she could find as a point of contact on Defendants' websites to demand retractions of the defamatory publications – only to be openly mocked by Defendants on Internet "weblogs" (a/k/a "blogs") and "chatrooms." Ms. Williams then retained legal counsel.

5. In September 2004, Ms. Williams self-disclosed the existence of the Defendants' websites to the Miss West Virginia and Miss America organizations in an effort to stave off any character investigations that could jeopardize the scholarship money she earned through her participation in these pageants.

Parties

I. Plaintiff

6. Plaintiff, Allison Williams, is a resident of West Virginia.

II. U.S. Defendants

7. Defendant Advertising Sex, LLC ("Advertising Sex") is a Nevada limited liability company with its principal place of business in Las Vegas, Nevada. Defendants Advertising Sex and Raymond Williams jointly registered the Internet domain names www.icangetyouin.com, www.famousblowjobs.com, www.nude-celebrities-network.com, www.picturemans.com, and www.nude-celebrities-network.org.

8. Defendant Raymond Williams (a/k/a AdvertisingSex and Big_Ray) is, on information and belief, a resident of Las Vegas, Nevada who holds the registration for the Internet domain names www.icangetyouin.com, www.famousblowjobs.com, www.nude-celebrities-network.com, www.picturemans.com, and www.nude-celebrities-network.org. On information and belief, Defendant Williams is the principal owner of Advertising Sex, LLC.

9. Defendant PalmBeach-Online.com, Inc. ("PalmBeach-Online") is a Florida corporation with its principal place of business in Jupiter, Florida. Defendant PalmBeach-Online holds the registration for the Internet domain names www.celebflix.com, www.curiouswhitegirls.com, and www.tgpprofessional.com.

10. Defendant Kenneth M. Boyd is, on information and belief, a resident of Florida. He is an officer and/or director of Defendant PalmBeach-Online. Defendant Kenneth Boyd holds the registration for the Internet domain name www.nohiddenfaces.com.

11. Defendant Edith G. Boyd (a/k/a Edith Gallagher) is, on information and belief, a resident of Florida. She is an officer and/or director of Defendant PalmBeach-Online. She is the

administrative contact for the Internet domain name www.nohiddenfaces.com, and holds the registration for the Internet domain name www.22469.com.

12. Defendant Steve Bryant (a/k/a DJStevieB) is, on information and belief, a resident of Tennessee. He holds the registration for the Internet domain names www.nude-celebrity-photos-and-videos.com, www.sextoyssexvideos.com, and www.sextoyssexvideos.com.

13. Defendant G.A.M.E. (d/b/a, *inter alia*, Global Attractions Modeling Enterprises, Global Attractions Media, Global Adult Media) is, on information and belief a Tennessee business entity of unknown form, but operated by Defendant Bryant.

14. Defendant Nicholas Cain is, on information and belief, a resident of Pennsylvania. He holds the registration for the Internet domain name www.cameron-diaz-video.com.

15. Defendant Cain Web Design, Inc. ("Cain Web Design") is a Pennsylvania corporation with its principle place of business in Exeter, Pennsylvania. On information and belief, Cain Web Design is involved in the construction, ownership, and content of www.cameron-diaz-video.com.

16. Defendant Charlie Hintz (a/k/a chuk) is, on information and belief, a resident of Wisconsin. He holds the registration for the Internet domain name www.mentalshed.com.

17. Defendant Mental Shed, LLC (d/b/a, *inter alia*, Sick Twisted Media) ("Mental Shed") is, on information and belief, a Wisconsin business entity of unknown form (despite the LLC moniker), operated by Defendant Hintz. On information and belief, Defendants Hintz and Mental Shed are responsible for the content of www.mentalshed.com

18. Defendant Chris Hartmann (a/k/a Wahooter) is, on information and belief, a resident of California. On information and belief, his email address is listed as the administrative contact for www.wahoothumbs.com.

19. Defendant Xoteck, LLC ("Xoteck") is a California limited liability company with its principal place of business in Martinez, California. On information and belief, Defendants Xoteck and Hartmann are involved in the construction, ownership, and content of www.wahoothumbs.com

20. Defendant DRP Media, Inc. (d/b/a Cash Solutions Group) ("DRP Media") is, on information and belief, a Delaware corporation with its principal place of business in Hollywood, Florida.

21. Defendant David Peterson is, on information and belief, a resident of Florida. Defendants DRP Media and David Peterson jointly hold the registration for the Internet domain name www.free-naked-celebrities.us. On information and belief, Defendant Peterson is the principal owner of DRP Media.

22. Defendant Vidbidness, Inc. ("Vidbidness") is a Nevada corporation with its principal place of business in Studio City, California. Defendant Vidbidness holds the registration for the Internet domain name www.dailyadultjoke.com.

23. Defendant Eric Ridley is, on information and belief, a resident of California. On information and belief, Defendants Vidbidness and Ridley are involved in the construction, ownership, and content of www.dailyadultjoke.com.

24. Defendant Performance Marketing Group, Inc. ("Performance Marketing") is an Ohio corporation with its principal place of business in Beachwood, Ohio. Defendant Performance Marketing holds the registration for the Internet domain names www.performancecorporate.com and www.webtechin.com.

25. Defendants Darren M. McLaughlin and Pamela L. McLaughlin are, on information and belief, a residents of Ohio. Defendant Darren McLaughlin and Pamela McLaughlin serve as the President and Secretary of Performance Marketing, respectively. On information and belief,

Defendants Performance Marketing and McLaughlin are involved in the construction, ownership, and content of www.webtechin.com.

26. Defendant Ronald Yates is, on information and belief, a resident of Texas.

27. Defendant Electronic Trax Productions (d/b/a ETRAX Productions) ("Etrax") is, on information and belief, a Texas business entity of unknown form, but operated by Defendant Yates. Defendants Yates and Etrax jointly hold the registration for the Internet domain name www.18yearoldsis.com.

28. Defendant Sergio Jacuzzi (a/k/a sergy) is, on information and belief, a resident of California.

29. Defendant Harhan Co. ("Harhan") is, on information and belief, a California business entity of unknown form. On information and belief, Defendants Harhan and Sergio Jacuzzi are involved in the construction, ownership, and content of www.young-nude-celebrities.com, www.holly-nude-celebrities.com, www.free-celebrities.pics.com, www.celebs-dialer.com, and www.dialerprofits.com.

30. Defendant Patrick J. Smith (a/k/a Smit, Smitty, and SmitHappens) is, on information and belief, a resident of Virginia. On information and belief, Defendant Smith is involved in the construction, ownership, and content of www.smithhappens.com.

31. Defendant Eliza Razia (a/k/a Michele Frosty, Tropicana Lolita, frostylipz, Chelle, Fazia Killafey, and Platinum Pimpette) is, on information and belief, a resident of New York.

32. Defendant Fli Exotic Inc. ("Fli Exotic") is, on information and belief, a business entity of unknown form (despite the Inc. moniker) located in New York, New York.

33. Defendant FrostyLips LLC is a limited liability company formed in New York, New York. On information and belief, Defendants Razia, Fli Exotic and FrostyLips LLC are involved in the construction, ownership, and content of www.frostylips.com.

34. Defendant Joseph Vitagliano (a/k/a Vit) is, on information and belief, a resident of New York. Defendant Vitagliano holds the registration for the Internet domain name www.taxidrivermovie.com.

III. Foreign Defendants

A. Australia

35. Defendant Web Traffic Inc. ("Web Traffic") is an Australian business entity of unknown form (despite the Inc. moniker) located in Queensland, Australia that holds the registrations for the Internet domain names www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

36. Defendant Johnathon Landon is, on information and belief, a citizen and resident of Queensland, Australia. Defendant Landon, jointly with Web Traffic, holds the registrations for the Internet domain names www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

37. Defendant Scott Mark Moles (a/k/a juicybucks and juicybucks_scott) is, on information and belief, a citizen and resident of Queensland, Australia. Defendant Scott Moles is also associated with, *inter alia*, the websites www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

38. Defendant Zorg Enterprises is an Australian business entity of unknown form that is registered with the Australian Tax Office and Australian Securities & Investment Commission to do business under Defendant Scott Moles' name. Defendant Zorg Enterprises is also associated with, *inter alia*, the websites www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

39. Defendant Castle Co. Pty. Ltd. ("Castle Co.") is an Australian business entity of unknown form that is registered with the Australian Tax Office and Australian Securities & Investment Commission. On information and belief, Defendant Scott Moles controls Defendant Castle Co. Defendant Castle Co. is also associated with, *inter alia*, the websites www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

40. Defendant The Moles Trust ("Moles Trust") is an Australian trust entity of unknown form that is registered with the Australian Tax Office to conduct business under the name Castle Co. On information and belief, Defendant Scott Moles controls the assets of Defendant Moles Trust. Defendant Moles Trust is also associated with, *inter alia*, the websites www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

41. Defendant Russell M. Moles is, on information and belief, a citizen and resident of Queensland, Australia. On information and belief, Defendant Russell M. Moles is a director and fifty percent owner of Defendant Castle Co.

42. Defendant Gwendoline E. Moles is, on information and belief, a citizen and resident of Queensland, Australia. On information and belief, Defendant Gwendoline E. Moles is a director, officer, and fifty percent owner of Defendant Castle Co.

43. Defendant Guy Blomberg (a/k/a Yug, YugStar) is, on information and belief, a citizen and resident of Queensland, Australia. Defendant Blomberg is also associated with, *inter alia*, the websites www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

44. Defendant Chris Buckley (a/k/a JuicyBucks Chris, and R-C-E) is, on information and belief, a citizen and resident of Queensland, Australia. Defendant Buckley is also associated with, *inter alia*, the websites www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

45. Defendant Jane Doe No. 1 (a/k/a Diana), (hereinafter referred to as "Diana Doe") is, on information and belief, a citizen and resident of Queensland, Australia. Defendant Diana Doe is also associated with, *inter alia*, the websites www.juicybucks.com, exposed.paparazzifilth.com, www.paparazzifilth.com, www.celebritymoviepost.com, and www.thumbfix.com.

46. Defendant Eyegasmic Enterprises is an Australian business entity of unknown form. Eyegasmic Enterprises holds the registration for the Internet domain name www.eyegasmic.com.

47. Defendant John Doe No. 2 (a/k/a Troy), (hereinafter referred to as "Troy Doe") is, on information and belief, a citizen and resident of Queensland, Australia. On information and belief, Defendant Troy Doe is involved in the construction, ownership, and content of www.eyegasmic.com.

48. Defendant Scott Rickett (a/k/a gen0cide and Mondo) is, on information and belief, a citizen and resident of Queensland, Australia. Defendant Rickett holds the registration for Internet domain name www.insidecelebs.com.

49. Defendant Gen0cide Productions is an Australian business entity of unknown form, but operated by Defendant Rickett. Defendant Gen0cide Productions is also associated with and may hold the copyrights to, *inter alia*, the content on www.insidecelebs.com, www.gen0cide.com, and www.sickchicks.net.

50. Defendant Webresultz Pty Ltd. ("Webresultz") is an Australian business entity of unknown form, that is registered with the Australian Tax Office and Australian Securities & Investment Commission. Defendant Webresultz holds the registration for the Internet domain name www.baldbastard.com.

51. Defendant Craig Brown (a/k/a baldbastard) is, on information and belief, a citizen and resident of New South Wales, Australia. On information and belief, Defendant Craig Brown is an officer, director, and sole shareholder of Webresultz and is involved in the construction, ownership, and content of www.baldbastard.com

52. Defendant Michael Vacietis (a/k/a Rewn) is, on information and belief, a citizen and resident of Australian Capital Territory, Australia. On information and belief, Defendant Michael Vacietis is involved in the construction, ownership, and content of <http://realityskin.net>.

B. Belgium

53. Defendant Frederic Papillon (a/k/a Belgx and Pap) is, on information and belief, a citizen and resident of Brussels, Belgium. On information and belief, Defendant Papillon is responsible for and may hold the copyrights to, *inter alia*, the content on www.cx.be, www.smallprice.be, www.belgx.com, and www.superhotlist.com

54. Defendant CX is, on information and belief, a Belgian business entity of unknown form, but operated by Defendant Papillon. Defendant CX is also associated with and may hold the copyrights to, *inter alia*, the content on www.cx.be, www.smallprice.be, www.belgx.com, and www.superhotlist.com

C. Canada

55. Defendant Jane Doe No. 3 (a/k/a TW, Tracy0101, taw500, celebvideo, and tbabe) (hereinafter "Tracy Doe") is, on information and belief, a citizen and resident of Ontario, Canada. Defendant Tracy Doe holds the registrations for the Internet domain names www.paris-hilton-sex.com and www.freecelebrities.org.

56. Defendant Peter Smallwood (a/k/a DJ Sky, DJ_Sky69, and Retro Rewind) is, on information and belief, a citizen and resident of British Columbia, Canada.

57. Defendant Purple Sky Productions is a Canadian business entity of unknown form, but operated by Defendant Smallwood. On information and belief, Defendants Purple Sky Productions and Smallwood are involved in the construction, ownership, and content on the subdomain djsky.pornhost.biz.

D. Cayman Islands

58. Defendant Fauladi Singh is, on information and belief, a citizen and resident of Grand Cayman, Cayman Islands. Defendant Singh holds the registration for the Internet domain name www.celebritympeg.com.

E. South Africa

59. Defendant Mark van Heerden (a/k/a Zerocool and Psychic_Mark) is, on information and belief, a citizen and resident of Gauteng, South Africa. Defendant van Heerden holds the registration for the Internet domain name www.daily-celebvideos.com.

F. The Netherlands

60. Defendant CCG Groep BV ("CCG Groep") is, on information and belief, a Dutch business entity of unknown form located in Groningen, The Netherlands. CCG Groep holds the registration for the domain names www.amateurstart.com, www.superbadboy.com, and www.webmastersale.com.

61. Defendant Manuel Noten is, on information and belief, a citizen and resident of Groningen, The Netherlands. Defendant Noten is also associated with and may hold the copyrights to, *inter alia*, the content on www.amateurstart.com, www.superbadboy.com, and www.webmastersale.com.

62. Defendant NetSaits BV ("NetSaits") is, on information a belief, a Dutch business entity of unknown form that is located in Zandvoort, The Netherlands. Defendant NetSaits holds the registration for the Internet domain name www.classycelebs.com

63. Defendant Gerco Marsch is, on information and belief, a citizen and resident of The Netherlands. Defendant Marsch is the administrative and technical contact for the Internet domain name www.classycelebs.com.

64. Defendant Henry Rottine (a/k/a Ero Angel) is, on information and belief, a citizen and resident of The Netherlands. Defendant Rottine holds the registration for the Internet domain name www.sextapescelebs.com.

Jurisdiction

65. This Court has subject matter jurisdiction over this civil action pursuant to 29 U.S.C. § 1332 based on diversity of citizenship in this action between citizens of different states and in which citizens or subjects of a foreign state are additional parties for common law claims in a controversy exceeding the sum or value of \$75,000.

66. The Defendants intended their tortious acts described in this Complaint to cause harm in West Virginia. The Defendants tortious conduct did cause such harm in West Virginia.

67. In particular, the Defendants published false and defamatory statements on interactive websites that were purposefully and specifically directed at West Virginia residents by means of international publication, international advertisement, credit card transactions overtly contemplating West Virginian customers, and defamatory publications themselves directed at those interested in the activities of a former "Miss West Virginia."

68. The Defendants knew or should have known that the harm resulting from their defamatory publications would manifest itself primarily in West Virginia.

69. On information and belief, the Defendants, through their websites, capture and retain information about the individuals who visit their websites. On information and belief, the Defendants do business in the State of West Virginia and have sufficient minimum contacts to warrant this Court to invoke personal jurisdiction over them in a manner consistent with traditional notions of due process.

Venue

70. Venue is proper in this judicial district under 28 U.S.C. § 1391(a), (c) & (d) because a substantial part of the events or omissions giving rise to the claim occurred in this judicial district, the harm manifested itself primarily in this judicial district, the Defendants are subject to personal jurisdiction in this judicial district based on their conduct purposefully directed at West Virginians, and foreign Defendants may be sued in any district.

Factual Allegations

I. The "Sex Tape"

71. This lawsuit arises from Allison Williams' August 2004 inadvertent discovery of the existence of the Defendants' websites containing a streaming-video sex tape (the "Sex Tape"), and images thereof, falsely purporting to depict the Plaintiff, a former Miss West Virginia, engaged in a variety of sexual acts in the cargo area of a news van.

72. The Sex Tape, and photographic images from it, were available on certain Defendants' websites such that they are viewable on a computer screen.

73. Ms. Williams is not the woman depicted in the Sex Tape.

74. Ms. Williams has never participated in the making of any such video.

75. Ms. Williams has never been a news reporter, as claimed in certain Defendants' websites.

76. Ms. Williams has never met the woman depicted in the Sex Tape. Ms. Williams does not know the identity of the woman (the "Unidentified Woman").

77. Ms. Williams has never met, much less engaged in sexual acts with, the man depicted in the Sex Tape. Ms. Williams does not know the identity of the man (the "Unidentified Man").

II. The Internet

78. The "Internet" is an international computer network of interoperable packet switched data networks.

79. Globally, more than 839.9 million people had access to the Internet in 2004.

80. In the United States, more than 168.4 million adults had access to the Internet in 2004. Forty-eight percent of adult residents of West Virginia had access to the Internet in 2003.

81. At all times relevant to the allegations of this Complaint, millions of computers in the United States linked directly to the Internet. People also accessed the Internet on personal computers through modem telephone, DSL, wireless and/or cable access to a computer or computer network linked to the Internet.

82. The "World Wide Web" (the "Web") consists of a vast number of documents stored in different computers all over the United States and the world containing information formatted according to Web publishing standards.

83. Information on the Web is located at millions of separate "websites" that display content provided by particular individuals or organizations, including the Defendants.

84. Each website and its originating computer connect to the Internet by means of protocols that permit each website to become part of a single body of information accessible by all Web visitors.

85. The Internet Corporation for Assigned Names and Numbers ("ICANN"), an internationally organized, non-profit corporation, holds responsibility for Internet Protocol ("IP") address space allocation and other important protocols governing Internet usage.

86. As a private-public partnership, ICANN has responsibility for management and oversight over the Domain Name System ("DNS"). DNS helps users find their way around the Internet. Every computer on the Internet has a unique address called its "IP address." Because IP

addresses (which are strings of numbers) are hard to remember, the DNS allows a familiar string of letters (the “domain name”) to be used instead. So rather than typing “192.0.34.65,” a user can type “www.icann.org.”

87. People using computers to access the Internet (“users”) view a website through “browser” software, which allows the user to display, download, and print out information from the Web.

88. People who do not know the address of a given website, or who conduct generalized searches, access websites by means of a “search engine,” which find individual websites by using a word or strings of words to locate those sites.

89. ICANN is responsible for coordinating the management of the technical elements of the DNS to ensure universal resolvability so that all users of the Internet can find all valid addresses. It does this by overseeing the distribution of unique technical identifiers used in the Internet’s operations, and delegation of top-level domain names (such as .com, .info, etc.) to ICANN-accredited domain name registrars (“Registrars”).

90. Registrars, once accredited, are authorized to sell domain names to qualified registrants (“Registrants”) who then own, host and/or operate the websites they have registered.

91. In order to become accredited, Registrars must enter into a “Registrar Accreditation Agreement” that requires Registrars to maintain publicly accessible databases linking Registrants’ contact information to the Registrants’ domain names. These databases are called “whois” databases.

92. The Registrar Accreditation Agreement also contemplates and imposes obligations on Registrants:

The Registered Name Holder shall provide to Registrar accurate and reliable contact details and promptly correct and update them during the term of the Registered Name registration, including: the full name, postal address, e-mail address, voice telephone number, and fax number if available of the Registered Name Holder; name of

authorized person for contact purposes in the case of an Registered Name Holder that is an organization, association, or corporation.

93. As set forth below, many of the Defendants to this action utterly failed to provide their respective Registrars with "accurate and reliable contact details" regarding their identities, and instead attempted to conceal their identities to evade liability for tortious and/or otherwise illegal conduct.

94. Despite certain Defendants' efforts, as demonstrated by this Complaint, Ms. Williams has identified the vast majority of the parties responsible for injuring her.

III. The Big Business of Internet Pornography

95. The pornography industry promotes entertainment products and services related to sexual activity.

96. In 2003, the pornography industry generated an estimated \$57 billion dollars in revenue worldwide.

97. Pornography industry revenue attributable to its Internet sector accounted for an estimated \$2.5 billion in 2003. There are an estimated 4.2 million pornography websites, which account for approximately 12% of all websites available on the Web.

98. On a daily basis, there are an estimated 68 million pornography-related search engine requests, which account for approximately 25% of all search engine requests.

99. There were approximately 72 million visitors on pornographic websites in 2003.

100. Pornography industry revenue exceeds the combined revenues of all professional football, baseball and basketball franchises.

101. The United States pornography industry revenue exceeds the combined revenues of the broadcast networks ABC, CBS, and NBC.

102. Internet pornography businesses have an obligation to comport with the accepted business practices, procedures and norms that allow aggrieved parties to identify those businesses.

Such obligations include, but are not limited to, registering their businesses with the appropriate authorities, registering agents for service of process, maintaining physical, identifiable business operations, registering accurate information with their Internet domain name Registrars, and responding to correspondence.

103. Many of the Defendants to this action have utterly failed to comport with such accepted business practices, procedures and norms. In fact, many of the Defendants have actively sought to hide their true identities, business practices, and locations to evade liability for intentionally tortious conduct. As a result, the Defendants have greatly enhanced the costs of the Plaintiff's investigation into the underlying facts and prosecution of this action.

IV. The JuicyBucks Conspiracy to Profit from the Defamation of Allison Williams

A. Defamatory Material on www.juicybucks.com

104. As of October 15, 2004, the website www.juicybucks.com ("JuicyBucks") posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

105. The website juxtaposed two images of the Plaintiff with three hyperlinked movie clip images of the Unidentified Woman represented to be the Plaintiff.

106. The advertisement read:

ALLISON WILLIAMS

Miss West Virginia and TV reporter gets banged in the camera truck!

CLICK HERE TO SEE HER FULL LENGTH EXPOSED VIDEO NOW!

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!"

107. Hitting any of the hyperlinks redirected the user to exposed.paparazzifilth.com, which, through the procedures alleged below, allowed the user to purchase access to the Sex Tape.

108. Defendants Web Traffic Inc. and Johnathon Landon hold the Internet domain name registration for JuicyBucks and Johnathon Landon is listed as its administrative and technical contact. On information and belief, Defendants Web Traffic, Zorg Enterprises, Johnathon Landon, Scott Mark Moles, Castle Co., Moles Trust, Russell Moles, Gwendoline Moles, Guy Blomberg, Chris Buckley and Diana Doe (collectively, the "JuicyBucks Defendants"), along with other Defendants, are responsible for posting the defamatory material on JuicyBucks.

109. On information and belief, the JuicyBucks Defendants orchestrated a large civil conspiracy to defame and otherwise harm Plaintiff by offering financial incentives and free content to other website operators if they were willing to promote and reproduce the fraudulent and defamatory material on JuicyBucks (the "JuicyBucks Conspiracy"). On information and belief, the JuicyBucks Defendants constituted the conspiratorial hub and the other Defendants identified as participating in the JuicyBucks Conspiracy constituted spokes to that hub.

110. Upon information and belief, the JuicyBucks Defendants have established United States businesses in order to comply with Internet Payment Service Provider ("IPSP") regulations.

111. Namservers.net is listed on the Internet domain name registration as the operators of the JuicyBucks servers. However, on information and belief, Candidhosting of Tampa, Florida in fact operates the JuicyBucks servers.

112. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the JuicyBucks domain name registration, lisasphotos@hotmail.com. In addition, Plaintiff's counsel sent similar cease and desist letters to the contacts listed on JuicyBucks (scott@juicybucks.com, chris@juicybucks.com, support@juicybucks.com, abuse@juicybucks.com,

contact@juicybucks.com, and webmaster@juicybucks.com). Plaintiff's counsel never received any responses. However, sometime shortly thereafter, such defamatory materials were altered such that the image of the Plaintiff appeared to have brown eyes rather than her natural color, green. Presumably this was done to make the Plaintiff's image more compatible with the images of the Unidentified Woman, who appears to have brown eyes.

B. Defamatory material on exposed.paparazzifilth.com

113. As of October 19, 2004, the website exposed.paparazzifilth.com

("Exposed.PaparazziFilth") posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

114. The advertisement under hyperlinked text "Allison Williams" read:

Allison Williams Miss West Virginia and TV reporter get banged in the camera truck! The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!

115. The website juxtaposed hyperlinked images of the Plaintiff with the Unidentified Woman represented to be the Plaintiff.

116. The website had hyperlinked text stating: "Don't know who she is? Click Here to find out" which read:

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. (There is no evidence of her working there still, and it seems as though the station may have erased any evidence of her employment from the tv station's website - but sources say it is definately [sic] her).

117. To view the Sex Tape, a person must join Exposed.PaparazziFilth by entering credit card and other personal information.

118. When making payment by credit card, Exposed.PaparazziFilth requires the customer to enter his or her billing address, including a prompt for particular state of the United States. "West Virginia" is one of the answers available in the pull-down prompt menu.

119. The website requires customers to make a payment of either \$4.95 US Dollars for an unlimited trial access or \$29.95 US Dollars for an unlimited monthly access in order to view the entire video.

120. Additional methods of payment include check, phone, mail or by the minute.

121. Payment to view the video is collected by Verotel Merchant Services BV, who is a wholly owned subsidiary of Verza NV who is, upon information and belief, a Dutch business entity of unknown form.

122. Defendants Johnathon Landon and Web Traffic hold the Internet domain name registration for Exposed.PaparazziFilth and Johnathon Landon is listed as its administrative and technical contact. On information and belief, the JuicyBucks Defendants, along with other Defendants, are responsible for posting the defamatory material on Exposed.PaparazziFilth.

123. On information and belief, the JuicyBucks Defendants are the owners and/or operators of Exposed.PaparazziFilth, and used Exposed.PaparazziFilth as the portal for purposes of collecting the money generated by the JuicyBucks Conspiracy. As such, the JuicyBucks Defendants, through financial incentives, advertisement, and other means, steered Internet traffic to Exposed.PaparazziFilth so as to profit from the false and defamatory statements regarding the Plaintiff.

124. Namservers.net is listed on the Internet domain name registration as the operator of the Exposed.PaparazziFilth servers. However, on information and belief, Candidhosting of Tampa, Florida in fact operates the Exposed.PaparazziFilth servers.

125. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the Exposed.PaparazziFilth domain name registration, lisasphotos@hotmail.com. In addition, Plaintiff's counsel sent similar cease and desist letters to the contacts listed on JuicyBucks (scott@juicybucks.com, chris@juicybucks.com, support@juicybucks.com, abuse@juicybucks.com, contact@juicybucks.com, and webmaster@juicybucks.com). Plaintiff's counsel never received any responses. However, sometime shortly thereafter, such defamatory materials were altered such that the image of the Plaintiff appeared to have brown eyes rather than her natural color, green. Presumably this was done to make the Plaintiff's image more compatible with the images of the Unidentified Woman, who appears to have brown eyes.

C. Defamatory material on www.paparazzifilth.com

126. As of October 19, 2004, the website www.paparazzifilth.com ("PaparazziFilth") posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

127. The advertisement under hyperlinked text "Allison Williams" read:

Allison Williams Miss West Virginia and TV reporter get banged in the camera truck! The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!

128. The website juxtaposed a hyperlinked image of the Plaintiff with an image of the Unidentified Woman represented to be the Plaintiff.

129. The website had the hyperlinked text which stated "Don't know who she is? Click Here to find out" which read,

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. (There is no evidence of her working there still, and it seems as though the station may have erased any evidence of her employment from the tv station's website - but sources say it is definately [sic] her).

130. To view the Sex Tape, a user must join Exposed.PaparazziFilth through the procedures set forth above.

131. Defendants Johnathon Landon and Web Traffic hold the Internet domain name registration for PaparazziFilth and Johnathon Landon is listed as its administrative and technical contact. On information and belief, the JuicyBucks Defendants, along with other Defendants, are responsible for posting the defamatory material on PaparazziFilth.

132. Namservers.net is listed on the Internet domain name registration as the operator of the PaparazziFilth servers. However, on information and belief, Candidhosting of Tampa, Florida in fact operates the PaparazziFilth servers.

133. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the PaparazziFilth domain name registration, lisasphotos@hotmail.com. In addition, Plaintiff's counsel sent similar cease and desist letters to the contacts listed on JuicyBucks (scott@juicybucks.com, chris@juicybucks.com, support@juicybucks.com, abuse@juicybucks.com, contact@juicybucks.com, and webmaster@juicybucks.com). Plaintiff's counsel never received any responses. However, sometime shortly thereafter, such defamatory materials were altered such that the image of the Plaintiff appeared to have brown eyes rather than her natural color, green. Presumably this was done to make the Plaintiff's image more compatible with the images of the Unidentified Woman, who appears to have brown eyes.

D. Defamatory material on www.thumbfix.com

134. As of October 19, 2004, the website www.thumbfix.com ("ThumbFix") posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

135. The website juxtaposed two images of the Plaintiff with three hyperlinked movie clip images of the Unidentified Woman represented to be the Plaintiff.

136. The advertisement under hyperlinked text "Allison Williams" read:

Allison Williams Miss West Virginia and TV reporter get banged in the camera truck! The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!

137. The website juxtaposed a hyperlinked image of the Plaintiff with an image of the Unidentified Woman represented to be the Plaintiff.

138. The website had the hyperlinked text which stated "Don't know who she is? Click Here to find out" which read:

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. (There is no evidence of her working there still, and it seems as though the station may have erased any evidence of her employment from the tv station's website - but sources say it is definately [sic] her).

139. To view the Sex Tape, a user must join Exposed.PaparazziFilth through the procedures set forth above.

140. Defendants Johnathon Landon and Web Traffic hold the Internet domain name registration for ThumbFix and Johnathon Landon is listed as its administrative and technical contact. On information and belief, the JuicyBucks Defendants, along with other Defendants, are responsible for posting the defamatory material on ThumbFix.

141. Namservers.net is listed on the Internet domain name registration as the operator of the ThumbFix servers. However, on information and belief, Candidhosting of Tampa, Florida in fact operates the ThumbFix servers.

142. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the ThumbFix domain name registration, lisasphotos@hotmail.com. In addition, Plaintiff's counsel sent similar cease and desist letters to the contacts listed on JuicyBucks (scott@juicybucks.com, chris@juicybucks.com, support@juicybucks.com, abuse@juicybucks.com, contact@juicybucks.com, and webmaster@juicybucks.com). Plaintiff's counsel never received any responses. However, sometime shortly thereafter, such defamatory materials were altered such that the image of the Plaintiff appeared to have brown eyes rather than her natural color, green. Presumably this was done to make the Plaintiff's image more compatible with the images of the Unidentified Woman, who appears to have brown eyes.

E. Defamatory material on www.celebritymoviepost.com

143. As of February 15, 2005, the website www.celebritymoviepost.com ("CelebrityMoviePost") posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

144. The website juxtaposed two electronically-altered images of the Plaintiff with three hyperlinked movie clip images of the Unidentified Woman represented to be the Plaintiff. The images of Plaintiff were altered such that the image of the Plaintiff appeared to have brown eyes rather than her natural color, green.

145. The advertisement read:

ALLISON WILLIAMS

Miss West Virginia and TV reporter gets banged in the camera truck!

CLICK HERE TO SEE HER FULL LENGTH EXPOSED VIDEO NOW!

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong,

pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!"

146. Hitting any of the hyperlinks redirected the user to Exposed.PaparazziFilth, which, through the procedures alleged above, allowed the user to purchase access to the Sex Tape. On information and belief, the JuicyBucks Defendants, along with other Defendants, are responsible for posting the defamatory material on CelebrityMoviePost.

147. Namservers.net is listed on the Internet domain name registration as the operators of the CelebrityMoviePost servers. However, on information and belief, Candidhosting of Tampa, Florida in fact operates the CelebrityMoviePost servers.

F. Defamatory material on www.eyegasmic.com

148. As of October 25, 2004, the website www.eyegasmic.com ("Eyegasmic") had posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

149. The advertisement under hyperlinked text "Allison Williams" read:

Miss West Virginia and TV reporter get banged in the camera truck!

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!

150. The website juxtaposed a hyperlinked image of the Plaintiff with an image of the Unidentified Woman represented to be the Plaintiff.

151. The website had a hyperlink which stated "Don't know who she is? Click Here to find out" which read:

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. (There is no evidence of her working there still, and it seems as though the station may have erased any evidence of her employment from the tv station's website - but sources say it is definately [sic] her).

152. Hitting any of the hyperlinks redirected the user to Exposed.PaparazziFilth, which, through the procedures alleged above, allowed the user to purchase access to the Sex Tape.

153. Defendant Eyegasmic Enterprises holds the Internet domain name registration for Eyegasmic and is listed as its administrative and technical contact. On information and belief, Defendants Eyegasmic Enterprises and Troy Doe (the "Eyegasmic Defendants"), along with other Defendants, are responsible for posting the defamatory material on Eyegasmic.

154. On information and belief, the owners and/or operators of Eyegasmic have a financial arrangement with JuicyBucks and its related Defendants.

155. Server Provider.com, on information and belief, operates the Eyegasmic servers: ns1.serverprovider.com and ns2.serverprovider.com.

156. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed, at the time, as the Eyegasmic domain name registration, graphicsguru@earthling.net. Plaintiff's counsel never received a response. However, sometime shortly thereafter, the defamatory material was altered to remove the picture of the Plaintiff, but not the defamatory text. Sometime after October 27, 2004, the Internet domain name registration information was edited to list a new information, including a contact address of troy@mail.bluegravity.com. On December 30, 2004, Plaintiff's counsel re-sent the cease and desist letter to the new contact email address, and never received a response.

G. Defamatory material on www.nude-celebrities-network.com

157. As of October 15, 2004, the website www.nude-celebrities-network.com (“Nude-Celebrities-Network”) had posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

158. The advertisement under hyperlinked text “Allison Williams” read ““Miss West Virginia gets banged in a truck!””

159. The website juxtaposed a hyperlinked image of the Plaintiff with an image of the Unidentified Woman represented to be the Plaintiff.

160. Hitting any of the hyperlinks redirected the user to Exposed.PaparazziFiltH, which, through the procedures alleged above, allowed the user to purchase access to the Sex Tape.

161. Defendants Raymond Williams and Advertising Sex LLC (collectively, the “Advertising Sex Defendants”) hold the Internet domain name registration for Nude-Celebrities-Network and Defendant Williams is listed as its administrative, billing and technical contact. On information and belief, the Advertising Sex Defendants, along with other Defendants, are responsible for posting the defamatory material on Nude-Celebrities-Network.

162. On information and belief, the owners and/or operators of Nude-Celebrities-Network have a financial arrangement with JuicyBucks and its related Defendants.

163. Oxeo Hosting, Inc. of Brooklyn, New York, on information and belief, operates the Nude-Celebrities-Network servers: ns.oxeo.com and ns2.oxeo.com.

164. On October 27, 2004, Plaintiff’s counsel sent a cease and desist letter to the email address listed on the Nude-Celebrities-Network domain name registration, webmaster@advertisingsex.com. While Plaintiff’s counsel did receive a return receipt indicating successful delivery, they never received a response. However, sometime shortly thereafter, such defamatory materials were removed from Nude-Celebrities-Network.

H. Defamatory material on www.icangetyouin.com

165. As of October 15, 2004, the website www.icangetyouin.com (“Icangetyouin”) had posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

166. The advertisement under hyperlinked text “Allison Williams” read ““Miss West Virginia gets banged in a truck!””

167. The website juxtaposed a hyperlinked image of the Plaintiff with an image of the Unidentified Woman represented to be the Plaintiff.

168. Hitting any of the hyperlinks redirected the user to Exposed.PaparazziFilth, which, through the procedures alleged above, allowed the user to purchase a viewing of the Sex Tape.

169. The Advertising Sex Defendants hold the Internet domain name registration for Icangetyouin and are listed as its administrative, billing and technical contact. On information and belief, the Advertising Sex Defendants, along with other Defendants, are responsible for posting the defamatory material on Icangetyouin.

170. On information and belief, the owners and/or operators of Icangetyouin have a financial arrangement with JuicyBucks and its related Defendants.

171. Oxeo Hosting, Inc. of Brooklyn, New York, on information and belief, operates the Icangetyouin servers: ns.oxeo.com and ns2.oxeo.com.

172. On October 27, 2004, Plaintiff’s counsel sent a cease and desist letter to the email address listed on the Icangetyouin domain name registration, webmaster@advertisingsex.com. While Plaintiff’s counsel did receive a return receipt indicating successful delivery, they never received a response. However, sometime shortly thereafter, such defamatory materials were removed from Icangetyouin.

I. Defamatory material on www.esexteen.com

173. As of October 15, 2004, the website www.esexteen.com ("Esextteen") had posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

174. The advertisement under hyperlinked text "Allison Williams" read "'Miss West Virginia and TV reporter gets banged in a camera truck!'" Hitting either of these hyperlinks redirected the user to Exposed.PaparazziFilth, which, through the procedures alleged above, allowed the user to purchase access to the Sex Tape.

175. The website also posted a hyperlinked image of the Plaintiff with the hyperlinked text "Don't know who she is? Click Here to find out." Hitting this hyperlinked text redirected the user to a screen with an image of Plaintiff next to the following text:

The little known news talent from a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!

176. The Advertising Sex Defendants hold the Internet domain name registration for Esextteen and are listed as its administrative, billing and technical contacts. On information and belief, the Advertising Sex Defendants, along with other Defendants, are responsible for posting the defamatory material on Esextteen.

177. On information and belief, the owners and/or operators of Esextteen have a financial arrangement with JuicyBucks and its related Defendants.

178. Oxeo Hosting, Inc. of Brooklyn, New York, on information and belief, operates the Esextteen servers: ns.oxeo.com and ns2.oxeo.com.

179. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the Esexteen domain name registration, webmaster@advertisingsex.com. While Plaintiff's counsel did receive a return receipt indicating successful delivery, they never received a response. However, sometime shortly thereafter, such defamatory materials were removed from Esexteen.

J. Defamatory material on www.nude-celebrities-network.org

180. As of October 15, 2004, the website www.nude-celebrities-network.org ("Nude-Celebrities-Network.org") had posted, *inter alia*, an advertisement to view a gallery of photographic images of the Sex Tape.

181. The advertisement under hyperlinked text "Allison Williams" read "Nude Gallery."

182. The website juxtaposed the hyperlinked text with a hyperlinked image of the Plaintiff.

183. Hitting any of the hyperlinks redirected the user to www.picturemans.com, which, also operated by the Advertising Sex Defendants, allowed the user to view further images of the Plaintiff as well as images of the Unidentified Woman taken from the Sex Tape.

184. The Advertising Sex Defendants hold the Internet domain name registration for Nude-Celebrities-Network.org and are listed as its administrative, billing and technical contacts. On information and belief, the Advertising Sex Defendants, along with other Defendants, are responsible for posting the defamatory material on Nude-Celebrities-Network.org.

185. On information and belief, the owners and/or operators of Nude-Celebrities-Network.org have a financial arrangement with JuicyBucks and its related Defendants.

186. Oxeo Hosting, Inc. of Brooklyn, New York, on information and belief, operates the Nude-Celebrities-Network.org servers: ns.oxeo.com and ns2.oxeo.com.

187. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the Nude-Celebrities-Network.org domain name registration, webmaster@advertisingsex.com. While Plaintiff's counsel did receive a return receipt indicating successful delivery, they never received a response. However, sometime shortly thereafter, such defamatory materials were removed from Nude-Celebrities-Network.org.

K. Defamatory material on www.picturemans.com

188. As of October 15, 2004, the website www.picturemans.com ("Picturemans") posted, *inter alia*, an advertisement to purchase access to the Sex Tape.

189. The web page titled "Allison Williams nude" juxtaposed a hyperlinked image of the Plaintiff with three hyperlinked images of the Unidentified Woman engaged in various sexual acts.

190. Picturemans also offered a "'Pound It' Rating" with four small animated figures simulating a masturbatory act.

191. The text underneath the four images reads:

Want MORE of Allison Williams nude? For me, nude celebrities are all the rage. I just love to see the nude body of a famous celebrity like Allison Williams....I hope you enjoy seeing Allison Williams nude as much as I do. Maybe one day we will see her in a porn!"

192. Underneath a large advertising banner for "Paparazzi Filth," the text of Picturemans read:

...If you ever want to visit my little webpage I made to show the world my favorite naked celeb videos and pictures, then feel free to Click Here and enjoy some private time with my favorite famous babes like Allison Williams amoung [sic] others...~Ray.

193. Hitting any of the hyperlinks redirected the user to Exposed.PaparazziFilth, which, through the procedures alleged above, allowed the user to purchase access to the Sex Tape.

194. The Advertising Sex Defendants hold the Internet domain name registration for Picturemans and Defendant Williams is listed as its administrative, billing and technical contact. On information and belief, the Advertising Sex Defendants, along with other Defendants, are responsible for posting the defamatory material on Picturemans.

195. On information and belief, the owners and/or operators of Picturemans have a financial arrangement with JuicyBucks and its related Defendants.

196. Oxeo Hosting, Inc. of Brooklyn, New York, on information and belief, operates the Picturemans servers: ns.oxeo.com and ns2.oxeo.com.

197. On October 27, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the Picturemans domain name registration, webmaster@advertisingsex.com. While Plaintiff's counsel did receive a return receipt indicating successful delivery, they never received a response. However, sometime shortly thereafter, such defamatory materials were removed from Picturemans.

L. Defamatory material on www.nude-celebrity-photos-and-videos.com

198. As of October 15, 2004, the website www.nude-celebrity-photos-and-videos.com ("Nude-Celebrity-Photos") had posted, *inter alia*, an advertisement to purchase access to the Sex Tape. The homepage had a hyperlink entitled "allisonwilliamssextape."

199. Hitting that hyperlink redirected the user to a page with juxtaposed hyperlinked images of the Plaintiff and the Unidentified Woman taken from the Sex Tape. Underneath those images, the following text appeared:

ALLISON WILLIAMS

Miss West Virginia and TV reporter gets banged in the camera truck!

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!

ALLISON WILLIAMS BIOGRAPHY

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. (There is no evidence of her working there still, and it seems as though the station may have erased any evidence of her employment from the tv station's website - but sources say it is definately [sic] her.)

Allison Williams won the title of Miss West Virginia in 2003. What a girl, a sex fiend and a beauty queen, does it get any better? "

200. Hitting hyperlinked text below that read "Watching the full uncensored video at Papparazi [sic] Filth dot com" redirected the user to Exposed.PaparazziFilth, which, through the procedures alleged above, allowed the user to purchase access to the Sex Tape.

201. Defendant Steve Bryant holds the Internet domain name registration for Nude-Celebrity-Photos, and is listed as its administrative, billing and technical contact. On information and belief, Defendants Bryant and G.A.M.E. (the "G.A.M.E. Defendants"), along with other Defendants, are responsible for posting the defamatory material on Nude-Celebrity-Photos.

202. On information and belief, the owners and/or operators of Nude-Celebrity-Photos have a financial arrangement with JuicyBucks and its related Defendants.

203. Icertified.net of Grand Terrace, California, on information and belief, operates the Nude-Celebrity-Photos servers: dns1.icertified.net and dns2.icertified.net.

204. On November 12, 2004, Plaintiff's counsel sent a cease and desist letter to the email address listed on the Nude-Celebrity-Photos domain name registration, webmastersteve@comcast.net. While Plaintiff's counsel did receive a return receipt indicating successful delivery, they never received a response. However, sometime shortly thereafter, such defamatory materials were altered such that the image of the Plaintiff appeared to have brown eyes rather than her natural color, green. Presumably this

was done to make the Plaintiff's image more compatible with the images of the Unidentified Woman, who appears to have brown eyes.

M. Defamatory material on www.sextoyssexvideos.com

205. As of October 15, 2004, the website www.sextoyssexvideos.com ("Sextoyssexvideos") had posted, *inter alia*, an advertisement to purchase access to the Sex Tape. The homepage had a hyperlink entitled "allison williams sex tape."

206. Hitting that hyperlink redirected the user to a page with juxtaposed hyperlinked images of the Plaintiff and the Unidentified Woman taken from the Sex Tape. Next to those images, the following text appeared:

ALLISON WILLIAMS

Miss West Virginia and TV reporter gets banged in the camera truck!

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. Actually, it wasn't a home video - it was shot in the NEWS TRUCK!

She gets down and dirty in the news truck, and they taped it all - I have to say, she's quite the animal! She gets down and rides the dildo, sucks on the guys [sic] schlong, pounds her own pussy with the vibrator and more! Towards the end of the clip she keeps telling him "You better not cum! You better not cum!" She is one dirty beauty queen!

ALLISON WILLIAMS BIOGRAPHY

The little known news talent for a small town Virginia TV station is the next upcoming star in the leaked home video department. (There is no evidence of her working there still, and it seems as though the station may have erased any evidence of her employment from the tv station's website - but sources say it is definately [sic] her.)

Allison Williams won the title of Miss West Virginia in 2003. What a girl, a sex fiend and a beauty queen, does it get any better?

207. Hitting hyperlinked text below that read "Watching the full uncensored video at Papparazi [sic] Filth dot com" redirected the user to Exposed.PaparazziFilth, which, through the procedures alleged above, allowed the user to purchase access to the Sex Tape.