

1 Anthony A. Oliver., Plaintiff Pro Se
2 Post Office Box 847
3 Pooler Georgia 31322
(912) 220-5842 (Telephone)

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FEB 15 2019 *N/P*
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
SAN JOSE OFFICE
dh (03)

4 *Plaintiff Appearing Pro Se*

6 **UNITED STATES DISTRICT COURT**
7 **NORTHERN DISTRICT OF CALIFORNIA**
8 **SAN JOSE DIVISION**

9 **CV 19 0851 BLF**

10 ANTHONY A. OLIVER,

CASE NO.

11 Plaintiff,

SVK

12 vs.

PLAINTIFFS COMPLAINT FOR
DAMAGES

14 AABACO SMALL BUSINESS, LLC., a
15 Delaware Limited Liability Company;
n/c YOUTUBE, LLC., a Delaware Limited
16 Liability Company; GOOGLE, LLC., a
17 Delaware Limited Liability Company;
18 EHM PRODUCTIONS, Inc., a California
19 Corporation; WARNER BROS
20 ENTERTAINMENT, Inc., a Delaware
21 Corporation; NYP HOLDINGS, Inc., a
22 New York Corporation; THE WRAP
23 NEWS, Inc., a California Corporation;
24 PEREZ HILTON MANAGEMENT, Inc.,
25 a Delaware Corporation; HEARST
26 COMMUNICATIONS, Inc., a Delaware
27 Corporation; CBS INTERACTIVE, Inc.,
a Delaware Corporation; AMERICAN
MEDIA, Inc., a Florida Corporation;
RADAR ONLINE, L.L.C., a Florida
Limited Liability Company; CORTE
LODATO, L.L.C., a California Limited

DEMAND FOR JURY TRIAL

1 Liability Company; IMDB.COM, Inc., a
2 Delaware Corporation; MICROSOFT
3 CORPORATION, a Washington
4 Corporation; MEREDITH
5 WCORPORATION OF IOWA, an Iowa
6 Corporation; REDDIT, Inc., a Delaware
7 Corporation; RSV NG, L.L.C., a New
8 York Limited Liability Company; WENN
9 RYDE HOLDINGS, Inc., an Unknown
10 Delaware Corporation; WHALEROCK
11 TELEVISION PRODUCTIONS, Inc., a
12 Delaware Corporation; THOMSON
13 REUTERS AMERICA HOLDINGS, Inc.
14 a Delaware Corporation; THOMSON
15 REUTERS AMERICA CORPORATION,
16 a Delaware Corporation;

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Defendants.

1 **I. INTRODUCTION AND GENERAL ALLEGATIONS**

2 1. In 2018, Plaintiff Anthony Oliver, (“Plaintiff”) filed a federal
3 lawsuit in the Central District of California against a celebrity actress named
4 Jamie Luner, as well as other Defendants. In this case, Plaintiff alleged that
5 years prior, the Defendant sexually assaulted, provided drugs and raped the
6 Plaintiff when he was only 16 years old. Plaintiff then filed a police report with
7 the Los Angeles Police Department, (“LAPD”), and the Los Angeles County
8 District Attorney, (“LACDA”).

9 2. With litigation under way in federal Court, a police officer and/or
10 detective with the LAPD leaked a confidential police report that Plaintiff filed
11 with the LAPD and because Plaintiff was 16 years of age at the time of the
12 alleged sexual encounter, the police report was deemed sealed pursuant to
13 California law.

14 3. Shortly after the police reported was leaked, the lawsuit became
15 newsworthy to the media. Over two hundred websites, newspapers, media
16 outlets, commercials and television shows aired Plaintiffs lawsuit, as well as
17 stories of who the Plaintiff was or is. The news reports and media labels the
18 allegations and the lawsuit as the all-time best. The Defendant herself appeared
19 on several hit television shows in the 1990’s such as “Melrose Place, “Beverly
20 Hills 90210,” and four other shows. The public, as well as the media portrayed
21 the Defendant Jamie Luner as a “hot and sexy” actress being accused of false
22 allegations.

23 4. With the lawsuit filed by Plaintiff progressing, Plaintiff discovered
24 that various websites posted articles about Plaintiff. For instance, one
25 Defendant posted that Plaintiff “filed 127 lawsuits,” and was “confirmed by
26 NEWS 3” in Savannah Georgia. In another website, a Defendant posted “just
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1 confirming that Jamie Luner’s accuser is a convicted child molester.”
2 However, NEWS 3 denied a story exists and has never existed.

3 5. The first to begin making false allegations was a website
4 commonly known as www.msn.com and www.yahoo.com, in which these
5 websites were the first to air many false allegations. Once various false
6 allegations were posted on their website, hundreds of other websites and news
7 outlets began to follow. Days later, another website titled www.tmz.com also
8 posted false allegations concerning the Plaintiff, the lawsuit and the Defendant
9 Jamie Luner. Once tmz.com posted false allegations, over eighty-five websites
10 and corporations contacted tmz.com and they obtained the consent of tmz.com
11 to re-produce and/or re-print the articles that tmz.com posted.

12 6. Plaintiffs lawsuit was later dismissed against the Defendant on a
13 ruling from a motion to dismiss. Prior to judgment in the case, the Defendants’
14 in this case still continued to publish false allegations and articles to ruin the
15 Plaintiffs good name. Nearly a year later, tmz.com changed their postings to
16 even more derogatory statements. It was tmz.com who unlawfully produced an
17 incriminating statement on their website against the Plaintiff purportedly that
18 Plaintiff stated to tmz.com that it was Plaintiffs “brother who filed 127
19 lawsuits” using the Plaintiffs name. As time further progressed, Plaintiff
20 contacted tmz.com and a representative there admitted that tmz.com doing
21 business at EHM Productions, Inc., were responsible for obtaining the police
22 report that Plaintiff filed with the LAPD. After plastering more and more false
23 stories, reports from hundreds of other websites again were permitted to copy
24 and use their stories to be placed on their own websites, magazines and
25 newspaper to generate revenue, popularity and high ratings.

1 7. On or about January 7, 2019, Plaintiff who resides in Savannah
2 Georgia, filed his notice to run for Mayor of the City of Savannah. Plaintiff
3 appeared at numerous mayor events, as well as press conferences.

4 8. On various occasions, Plaintiff was asked about the defaming
5 articles that the Defendants' posted stating the "NEWS 3 in Savannah confirms
6 Anthony Oliver filed 127 lawsuits against various people."

7 9. Citizens of the community believed the phantom stories made up
8 and instigated by the Defendants. As time progressed, Plaintiff was informed by
9 citizens in the community would not be voting for the Plaintiff as a direct result
10 of Plaintiff filing "127 lawsuits," and that Plaintiff is perceived as a crook.
11 Upon information and belief, on this basis, Plaintiff believes that the
12 Defendants did cause actual injury to the Plaintiff for posting false articles and
13 stories using the world wide web that can be accessed by anyone or anytime by
14 members of the City of Savannah Georgia. Prior to this litigation, Plaintiff sent
15 cease and desist letters to each of the Defendants' requesting that they delete
16 their postings in lieu of litigation. However, a majority of the Defendants'
17 blamed tmz.com for the postings leaving only two out of one-hundred and
18 seventy-eight websites to delete their website postings that tmz.com gave them
19 permission to post.

20 **II. JURISDICTION AND VENUE**

21 10. This Court has jurisdiction over this matter under 28 U.S.C. §1332
22 as the amount in controversy between Plaintiff and the Defendants exceeds
23 \$75,000.00 exclusive of costs and interest. This Court also has jurisdiction over
24 some of the Defendants because, through their online businesses, they do
25 business nationally, including within the State of California and because some
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1 of the Defendants' acts on those online businesses resulted in harm to the
2 Plaintiff and his reputation within the State of California and Georgia.

3 11. Venue is proper in this District because a significant of the events
4 occurred in this District. Further, the lead Defendants that caused the damages
5 to the Plaintiff reside in this District. Additionally, almost all of the Defendants
6 have an agent for service in this District.

7 **III. PERSONAL AND SUBJECT MATTER JURISDICTIONS**

8 12. This Court also can assert personal jurisdiction over some of the
9 Defendants pursuant to the relevant states' long-arm statutes under the laws of
10 the State of California on one or more of the theories below:

11 a. Each Defendant has purposefully availed itself of the privilege of
12 conducting business activities within the relevant State of California and has the
13 requisite minimum contacts with each of those states because some of the
14 Defendants' participated in a conspiracy which injured Plaintiff in this state and
15 committed overt acts in furtherance of their conspiracy was committed within
16 the State of California; and/or

17 b. Each Defendant has purposefully availed itself of the privilege of
18 conducting business activities within the relevant State of California and has the
19 requisite minimum contacts with those states because each Defendant has
20 committed the intentional act(s) that were intended to cause and did cause
21 injury to the Plaintiff within the State of California; and/or

22 c. Each Defendant has purposefully availed itself of the privilege of
23 conducting business activities within the relevant State of California and has the
24 requisite minimum contacts with those states because each Defendant has
25 committed the intentional acts that defendants knew were likely to cause injury
26 to the Plaintiff within the State of California; and/or

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1 d. Each Defendant has purposefully availed itself of the privilege of
2 conducting business activities within the State of California and also has the
3 requisite minimum contacts with those states because each Defendant is a party
4 to an anticompetitive agreement with a resident of the relevant state, which
5 agreement is performed in whole or in part within the relevant State of
6 California; and/or

7 e. Each Defendant has purposefully availed itself of the privilege of
8 conducting business activities within the State of California and also has the
9 requisite minimum contacts with those states because each Defendant has
10 committed violations of California tort law within the State of California, which
11 has caused injury within this state; and/or

12 f. Each Defendant has purposefully availed itself of the privilege of
13 conducting business activities within the relevant State of California and has the
14 requisite minimum contacts with those states because each Defendant either has
15 clients within the relevant state or transacts business within the relevant state;
16 and/or

17 g. Each Defendant has purposefully availed itself of the privilege of
18 conducting business activities within the relevant State of California and has the
19 requisite minimum contacts with those states because each Defendant either has
20 clients within the relevant state or transacts business within the relevant state;
21 and/or

22 h. Each Defendant has purposefully availed itself of the privilege of
23 conducting business activities within the relevant State of California and has the
24 requisite minimum contacts with those states because Defendant has entered
25 into a written contract with one another to or transfer, or sell copies of articles
26 created by certain Defendants' with the State of California; and/or

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1 i. Each Defendant has purposefully availed itself of the privilege of
2 conducting business activities within the relevant State of California and has the
3 requisite minimum contacts with those states because each Defendant has
4 entered into a private written contract with one another to transmit funds as a
5 part of the contract amongst each of the Defendants.

6 **IV. PARTIES**

7 13. Plaintiff Anthony Oliver is a citizen of the State of Georgia.

8 14. Defendant Aabaco Small Business, L.L.C., (“AABACO”) is a
9 Delaware limited liability company existing under the laws of the State of
10 California and does business as www.yahoo.com.

11 15. Defendant YOUTUBE, L.L.C., (“YOUTUBE”) is a Delaware
12 limited liability company existing under the laws of the State of California and
13 does business as www.youtube.com.

14 16. Defendant Google, L.L.C., (“GOOGLE”) is a Delaware limited
15 liability company existing under the laws of the State of California and does
16 business as www.google.com.

17 17. Defendant EHM Productions, Inc., (“EHM”) is a California
18 Corporation existing under the laws of the State of California and does business
19 as www.tnz.com.

20 19. Defendant WARNER BROS ENTERTAINMENT., Inc.,
21 (“WARNER”) is a California Corporation existing under the laws of the State
22 of California. Plaintiffs believes and thereon alleges that WARNER in wholly
23 owned or in part by EHM Productions, Inc., or that WARNER owns EHM
24 Productions, Inc., doing business as www.tnz.com.

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1 20. Defendant NYP Holdings, Inc., (“NYP”) is a New York
2 Corporation existing under the laws of the State of New York and does business
3 as www.pagesix.com.

4 21. Defendant The Wrap News, Inc., (“THE WRAP”) is a California
5 Corporation existing under the laws of the State of California and does business
6 as www.thewrap.com.

7 22. Defendant Perez Hilton Management, Inc., (“PEREZ HILTON”) is
8 a Delaware Corporation existing under the laws of the State of California and
9 does business as www.perezhilton.com.

10 23. Defendant Hearst Communications, Inc., (“HEARST”) is a
11 Delaware Corporation existing under the laws of the State of California and
12 does business as www.sfgate.com.

13 24. Defendant CBS Interactive, Inc., (“CBS”) is a Delaware
14 Corporation existing under the laws of the State of California and does business
15 as www.popculture.com.

16 25. Defendant American Media, Inc., (“AMI”) is a Florida
17 Corporation existing under the laws of the State of Florida, doing business in
18 California and does business as www.soapoperadigest.com.

19 26. Defendant Radar Online, L.L.C., (“RADAR”) is a Florida limited
20 liability company existing under the laws of the State of Florida, does business
21 in the State of California as www.soapoperadigest.com.

22 27. Defendant Corte Lodato, L.L.C., (“CORTE”) is a California
23 limited liability company existing under the laws of the State of California and
24 does business in the State of California as www.celebritynetworth.com.

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1 28. Defendant IMDB.Com, Inc., (“IMDB”) is a Delaware Corporation
2 existing under the laws of the State of California and does business in
3 California as www.imdb.com.

4 30. Defendant Microsoft Corporation., (“MICROSOFT”) is a
5 Delaware Corporation existing under the laws of the State of California and
6 doing business in California as www.msn.com.

7 31. Defendant Meredith Corporation of Iowa., (“MEREDITH”) is a
8 Delaware Corporation existing under the laws of the State of California and
9 doing business in California as www.people.com.

10 32. Defendant Reddit, Inc., (“REDDIT”) is a Delaware Corporation
11 existing under the laws of the State of California and maintains its principal
12 place of business in California doing business as www.reddit.com.

13 33. Defendant RSV NG, L.L.C., (“RSV NG”) is a New York limited
14 liability company existing under the laws of the State of New York and
15 maintains its principal place of business in California doing business as
16 www.crimeonline.com.

17 34. Defendant Wenn Ryde Holdings, Inc., (“WENN RYDE”) is a
18 California Corporation existing under the laws of the State of California and
19 maintains its principal place of business in California doing business as
20 www.wenn.com.

21 35. Defendant Whalerock Television Productions, Inc.,
22 (“WHALEROCK”) is a Delaware Corporation existing under the laws of the
23 State of California and maintains its principal place of business in California
24 doing business as www.wonderwall.com.

25 36. Defendant Thomson Reuters America Corporation.,
26 (“REUTERS”) is a Delaware Corporation existing under the laws of the State
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1 of California and maintains its principal place of business in Minnesota doing
2 business in California as www.findlaw.com.

3 **V. COMMON ALLEGATIONS OF FACT**

4 In February of 2018, Plaintiff Anthony Oliver filed a federal lawsuit
5 against a high-profile celebrity by the name of Jamie Luner, (“LUNER”) in the
6 Central District of California. Prior to this lawsuit being filed, Plaintiff alleged
7 that he was in fact a victim of sexual assault by LUNER for statutory rape that
8 occurred at her home in Studio City, California in the 1990’s when Plaintiff was
9 only 16 years old.

10 After the lawsuit commenced, news media outlets from across the United
11 States were the first to report this lawsuit. Once LUNER was served with the
12 lawsuit, her manager began contacting several news media outlets. Defendant
13 Aabaco Small Business, L.L.C., (“AABACO”), (www.yahoo.com) began
14 posting comments on yahoo concerning the lawsuit. Further, AABACO spoke
15 directly to the publicist and manager of LUNER who provided AABACO with
16 a copy of the lawsuit filed by Plaintiff. As the case became news worthy,
17 AABACO who owns and operates yahoo, reached out to other news websites
18 and media outlets.

19 Once the article was posted on yahoo, it was then the Defendants Google,
20 L.L.C., (“GOOGLE”), (www.google.com) and its business partner Microsoft
21 Corporation, (“MICROSOFT”), (www.msn.com) started posting copies of the
22 lawsuit filed by Plaintiff. Once the official story ran on their official website,
23 Defendants AABACO, GOOGLE and MICROSOFT began updating their
24 stories on their websites by contracting out with news reporters from across the
25 United States. Under the guise of news reporting, Defendants AABACO,
26 GOOGLE, and MICROSOFT hired outside news reporters to amend the first
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1 story to report a false amended story purporting that Plaintiff “filed 127
2 lawsuits across the united states and was confirmed by a “NEWS 3 reporter in
3 Savannah, Georgia.”

4 Defendants AABACO, GOOGLE and MICROSOFT consented to these
5 allegations being published on their website without fact-checking from the
6 Plaintiff, without investigation, without interviewing those involved, but rather
7 only interviewed the celebrity Defendant Jamie Luner.

8 In Defendants’ purported “news,” Defendants reported in essence that
9 Plaintiff was interviewed by a news reporter on national television and that
10 Plaintiff “admitted to filing 127 lawsuits,” and its was these Defendants’ who
11 also false attached a link to this Georgia news station by entering a “click this
12 link to watch interview.”

13 Defendants then went on to say that Plaintiff gave several other news
14 media interviews to Defendant The Wrap News, Inc., (“THE WRAP”) doing
15 business as www.thewrap.com, but Plaintiff never provided an interview to any
16 of these people. Once AABACO, GOOGLE and MICROSOFT hired an outside
17 news reporter, these Defendants allowed their employee to reproduce this false
18 story of the Plaintiff on various websites on the internet. Once the false story
19 was complete, Defendants AABACO, GOOGLE and MICROSOFT included a
20 link to THE WRAP website that was again reproduced to hundreds of other
21 websites on the AABACO, GOOGLE and MICROSOFT websites.

22 Defendants AABACO, GOOGLE and MICROSOFT, acting in concert
23 with THE WRAP then also falsely reported on their websites through their
24 stories that Plaintiff was, among other things, an admitted “drug addict” despite
25 any evidence showing otherwise.

1 Defendants' AABACO, GOOGLE, MICROSOFT and THE WRAP's
2 articles were wholly and/or partially materially false. The false statements were
3 statements of fact and not mere opinion or puffery. The statements made by the
4 Defendants' to made to bolster their sales, publicity and to entice their audience
5 to subscribe to their websites, newsletters and purchase clothing items from the
6 online store. The fact that Defendants AABACO, GOOGLE, MICROSOFT and
7 THE WRAP published an article that Plaintiff was a drug addict was
8 sensational in many aspects. Defendants AABACO, GOOGLE, MICROSOFT
9 and THE WRAP sought to tarnish the reputation of the Plaintiff with hopes that
10 if the lawsuit filed by Plaintiff went forward against the celebrity actress, that
11 members of a jury would do internet searches and see these false allegations
12 with the high hopes that the jury would find in favor of actress Jamie Luner.

13 Every step of the way, agents, reporters and employees were in constant
14 contact with actress Jamie Luner and her manager. The Defendants AABACO,
15 GOOGLE, MICROSOFT and THE WRAP published articles, statements and
16 videos concerning the Plaintiff at the direction of Jamie Luner whether if they
17 were true or not. With all of these statements combined together, each of these
18 factual statements are defamation per se; the combination of all such factual
19 statements are abject bad faith defamation per se. Defendants' AABACO,
20 GOOGLE, MICROSOFT and THE WRAP's false reports, stories and articles
21 has placed Plaintiff in a false, sleazy, criminal light and has harmed their good
22 name and reputation of the Plaintiff.

23 Over the next several months, the Defendants AABACO, GOOGLE,
24 MICROSOFT and THE WRAP continued with their false stories. Upon
25 information and belief, Plaintiff believes and thereon alleges that over the next
26 several months, and year, Defendants AABACO, GOOGLE, MICROSOFT and
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1 THE WRAP sold, transferred, or loaned their articles to Defendants EHM
2 Productions, Inc., (“EHM”) (www.t TMZ.com), Warner Bros Entertainment, Inc.,
3 (“WARNER”), NYP Holdings, Inc., (“NYP”)(www.pagesix.com), RSV NG,
4 LLC., (“RSV NG”) (www.crimeonline.com), Hearst Communications, Inc.,
5 (“HEARST”) (www.sfgate.com), American Media, Inc., (“AMI”) and Radar
6 Online, L.L.C., (“RADAR”) (collectively www.soapoperadigest.com), about
7 the Plaintiff.

8 Over the next several months and year, the Defendants EHM, WARNER,
9 NYP, RSV NG, HEARST, AMI and RADAR began reproducing the same
10 stories and articles that AABACO, GOOGLE, MICROSOFT and THE WRAP
11 previously published that the Plaintiff filed 127 lawsuits and was a drug addict.

12 Within months, Defendant EHM (tmz.com) began publishing random
13 updated false stories concerning the Plaintiff. In time, EHM doing business as
14 TMZ falsely reported that EHM personally spoke to the Los Angeles County
15 District Attorney, (“LACDA”) and that the LACDA declined to file charges
16 because the statute of limitations lapsed on Plaintiff’s police report that was filed
17 by Plaintiff against actress Jamie Luner. These statements made by EHM were
18 false and lacking any credibility. At no time did EHM or TMZ ever speak to the
19 LACDA or any District Attorney largely in part because Plaintiff filed a police
20 report that was filed under seal because of the fact that Plaintiff was only 16
21 years old when the allegation of statutory rape occurred.

22 Therefore, state law precludes not only the police report being made
23 public, but also any decisions not to prosecute the Defendant are confidential.
24 However, EHM still published on their website stating otherwise. Defendant
25 EHM labeled the story as “breaking news, Melrose Place star Jamie Luner No
26 Charges in Sexual Assault case brought by drug addict Anthony Oliver.”

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1 Defendant EHM also went on to say that “TMZ broke this story and that
2 EHM (through TMZ) stated that Plaintiff provided an interview with EHM and
3 TMZ and informed the Defendants that all of the 127 lawsuits were filed by the
4 Plaintiffs brother, and not the Plaintiff. This statement was utterly false and
5 lacking any credibility.

6 Again, over the next eight months, the remaining Defendants CBS
7 Interactive, Inc., (“CBS”)(www.popculture.com), Perez Hilton Management,
8 Inc., (“PEREZ HILTON”)(www.perezhilton.com), Corte Lodato, LLC.,
9 (“CORTE”)(www.celebritynetworth.com), Meredith Corporation of Iowa,
10 (“MEREDITH”) (www.people.com), Wenn Ryde Holdings, Inc., (“WENN
11 RYDE”)(www.wenn.com), IMDB.Com, Inc., (“IMDB”) (www.imdb.com),
12 Reddit, Inc., (“REDDIT”) (www.reddit.com), Thomson Reuters America
13 Corporation., (“REUTERS”)(www.findlaw.com), and Whalerock Television
14 Productions, Inc., (“WHALEROCK”)(www.wonderwall.com), obtained copies
15 of the phantom stories that Plaintiff filed 127 lawsuits, is a drug addict, stated
16 that it was his brother that filed 127 lawsuits and admitted to filing 127 lawsuits
17 to a news reporter in Georgia on their websites.

18 As a classic example of the actions of the Defendants, CBS, PEREZ
19 HILTON, CORTE, MEREDITH, WENN RYDE, IMDB, REDDIT, REUTERS
20 WHALEROCK and NYP, admitted in their stories, articles and postings that
21 the information and false allegations were provided by Defendant EHM (tmz)
22 and was reproduced with the permission of EHM.

23 Plaintiff believes and thereon alleges the Defendants paid money to
24 California Defendant EHM for exclusive rights to the story aired by EHM. In
25 fact, the Defendants CBS, PEREZ HILTON, CORTE, MEREDITH, WENN
26 RYDE, IMDB, REDDIT, REUTERS WHALEROCK and NYP also cite to the

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1 false article listed by EHM (tmz) and includes a hyper link in each of these
2 Defendants stories. In one posting by Defendant RSV NG, (crime online), who
3 does business in California with the other Defendants, RSV NG posted a picture
4 of a 300-pound guy that is not that of the Plaintiff. Further, RSV NG states, like
5 the other Defendants, that according to EHM that Plaintiff told EHM that it was
6 his brother who filed 127 lawsuits, is a drug addict despite the fact that Plaintiff
7 never spoke to EHM or RSV NG.

8 Through several links on its page, Defendant RSV NG attaches the
9 stories from other news outlets falsely published by Defendants EHM, THE
10 WRAP and unknown news reporters acting on behalf of the Defendants.

11 Shortly after Defendant RSV NG posted a false picture purportedly that
12 of the Plaintiff, Defendant YOUTUBE, L.L.C., (“YOUTUBE”) began posting
13 photo videos of the purported picture of the Plaintiff. Defendant YOUTUBE
14 posted one video on its site; “she pulled out a bag of crystal meth and drug
15 addict Anthony Oliver snorted it faster than a hoover vacuum.” This video and
16 posting were completely false.

17 Plaintiff is not a drug addict, however in the lawsuit that Plaintiff filed
18 against actress Jamie Luner, Plaintiff stated in the complaint for damages that
19 the Defendant Jamie Luner provided Plaintiff with drugs under the false
20 pretenses that it was Tylenol. Despite the allegations, all of the Defendants
21 insisted on labeling Plaintiff as a drug addict. Once YOUTUBE created false
22 picture videos of the Plaintiff on its website, the videos can be seen with views
23 in the millions by viewers.

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1 In the context of the underlying reports, posts, tweets and articles,
2 minimal journalistic standards were not applied as each of the Defendants
3 engaged in abject failure to interview the Plaintiff, rather they embarked on a
4 journey to only interview the Defendant in the lawsuit, actress Jamie Luner. By
5 each of the Defendants interviewing actress LUNER, the stories bolstered even
6 hire ratings for the Defendants. Because of their gross, abject, malicious, bad
7 faith failure, Defendants and each of them are subject to punitive damages.

8 Each of the Defendants doing business outside of the State of California
9 committed violations of California State tort law by acting in concert with the
10 Defendants doing business in California. Specially, Defendants NYP, AMI,
11 RADAR, RSV and NG, ¹ personally availed themselves to the jurisdiction
12 because they are doing business through Defendant EHM, a California
13 corporation. Plaintiff believes and thereon alleges that these Defendants NYP,
14 AMI, RADAR, RSV and NG are the agents of EHM (tmz) and receive money
15 through payroll to post articles, tweets, stories and photos on their websites.

16 The Defendants and each of them, made publications and remarks that
17 have caused Plaintiff mental and emotional distress. As anyone who wants to
18 view these articles can see much of these materials on the Internet and told
19 about by third-parties and have caused Plaintiff humiliation, anxiety and weight
20 loss.

21 As a direct result of the actions of the Defendants and each of them, the
22 Plaintiff has spent thousands of dollars trying to remove the false articles and
23 postings that the Defendants have posted on their websites.

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26 ¹ Defendants NYP and RSV NG are New York corporations, but list California phone
27 numbers, addresses, and the California Code of Civil Procedure 1798.83 on their websites.
28 Therefore, Plaintiff alleges that these Defendants are California Corporations.

1 The acts of each of the Defendants were intentional, reckless and with
2 complete disregard for the rights of the Plaintiff entitling Plaintiff to an award
3 of punitive damages pursuant to California Code of Civil Procedure, § 3294.

4 **FIRST CLAIM FOR RELIEF**

5 **Libel Under California State Common Law**

6 Plaintiff incorporates the foregoing allegations by reference.

7 By reason thereof, Defendants and each of them committed libel with
8 each false article published about the Plaintiff Anthony Oliver. Plaintiffs has
9 sustained significant injury in fact as a result of the actions of the Defendants.

10 Defendants conspired with one another to transfer or sell their stories to
11 other news media outlets, websites and televisions shows.

12 Plaintiff has suffered and continues to suffer economic harm as a result of
13 the Defendants' actions.

14 **SECOND CLAIM FOR RELIEF**

15 **Intentional Infliction of Emotional Distress**

16 Plaintiff incorporates the foregoing allegations by reference.

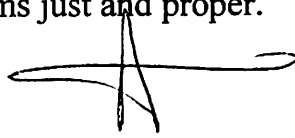
17 Defendants acted negligently, recklessly, or intentionally in publishing
18 the false and defamatory stories, articles and post of Plaintiff thereby caused
19 emotional distress against him. Defendants were under a duty to fact-check and
20 report accurate facts and do to so by remaining objective and not merely
21 validating and rubber-stamping the bald, false allegations uttered by other news
22 outlets, or Actress Jamie Luner. Defendants and each of them, breached their
23 duty knowingly investigate claims before posting them on the internet. The
24 actions of the Defendants were intentionally, negligently or recklessly, and
25 caused Plaintiff foreseeable harm.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Anthony Oliver prays for the following relief:

1. An award of damages in the amount of \$ 2,000,000.00 for the Defendants jointly and Severally;
2. A determination that Defendants' conduct as alleged herein is unlawful and/or unfair;
2. An award to Plaintiff of actual, compensatory, and punitive damages, as proven at trial pursuant California State law;
3. An order enjoining Defendants from engaging in the unlawful and/or unfair business practices described herein;
4. An award to Plaintiff of all fees, costs, and pre- and post-judgment interest;
5. Such other relief as this Court deems just and proper.

February 15, 2019

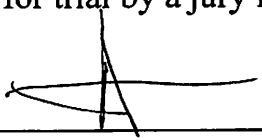
By: 

Anthony Oliver, Pro Se
Post Office Box 847
Pooler Georgia 31322
Telephone: (912) 220-5842

JURY TRIAL DEMAND

Pursuant to Seventh Amendment to the United States Constitution, Plaintiff hereby respectfully requests a demand for trial by a jury in this action.

February 15, 2019

By: 

Anthony Oliver, Pro Se
Post Office Box 847
Pooler Georgia 31322
Telephone: (912) 220-5842