

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Stuart Rice

1 David P. Beitchman (SBN 198953)
dbeitchman@bzlegal.com
2 Paul Tokar (SBN 305267)
ptokar@bzlegal.com
3 **BEITCHMAN & ZEKIAN, P.C.**
4 16130 Ventura Blvd., Ste. 570
Encino, California 91436
5 Telephone: (818) 986-9100
6 Facsimile: (818) 986-9119

7 Attorneys for Plaintiff,
8 Shannon Beador

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11
12 SHANNON BEADOR, an individual;
13
14 Plaintiff,
15
16 vs.
17 FACEBOOK, INC. dba DELAWARE
FACEBOOK, INC. dba INSTAGRAM; a
18 Delaware Corporation; DOE DEFENDANTS
1 - 20,
19
20 Defendants

Case No.: 21STCV25220

**COMPLAINT FOR: VIOLATIONS OF BUS.
& PROF. CODE, § 17200**

21
22 Plaintiff, SHANNON BEADOR hereby complains against FACEBOOK, INC. dba
23 DELAWARE FACEBOOK, INC. dba INSTAGRAM, and Defendants Does 1 through 20, inclusive,
24 and alleges as follows:

25 **PARTIES**

- 26 1. Plaintiff, SHANNON BEADOR (“Plaintiff” or “Beador”) is an individual resident of
27 the State of California, County of Orange, and who conducts business in the County of Los Angeles.
28 2. Plaintiff is informed, believes, and thereon alleges that Defendant FACEBOOK, INC.

1 dba DELAWARE FACEBOOK, INC. dba INSTAGRAM (“Defendant” or “FACEBOOK”) is located
2 within the state of California and is routinely conducting business in the County of Los Angeles, as set
3 forth herein and throughout.

4 3. Plaintiff is informed, believes, and thereon alleges that Defendants DOES 1-20, are
5 located within the State of California, and are routinely conducting business in the County of Los
6 Angeles, as set forth herein and throughout.

7 4. Plaintiff is informed, believes, thereon alleges that Defendant DOE 1 is conducting
8 fraudulent business activities as REMY ZAGORSKI (“DOE 1”) and is located within the State of
9 California, and is routinely conducting business in the County of Los Angeles, as set forth herein and
10 throughout.

11 5. Plaintiff is informed and believes and thereon alleges that said DOE 1 Defendant
12 conducting the fraudulent business activities described herein operates a Facebook account identified
13 as “Remy Zagorski”.

14 6. Plaintiff is ignorant of the true names and capacities, whether individual, corporate,
15 associate or otherwise, of Defendants Does 1 through 20, inclusive. Such fictitious defendants are sued
16 pursuant to the provision of Section 474 of the California Code of Civil Procedure. Plaintiff is informed
17 and believes, and thereon alleges, that each fictitious defendant was in some way responsible for,
18 participated in, or contributed to the matters and things of which Plaintiff complains herein, and in
19 some fashion has legal responsibility therefore. When the exact nature and identity of such fictitious
20 Defendants’ responsibility for, participation in, and contribution to the matters and things herein
21 alleged is ascertained by Plaintiff, Plaintiff will seek to amend this Complaint and all proceedings
22 herein to set forth the same.

23 **JURISDICTION AND VENUE**

24 7. This Court has jurisdiction over all causes of action asserted herein pursuant to
25 California Constitution, Article VI, § 10 and California Code of Civil Procedure Section 410.10
26 because the acts and omissions alleged herein were committed in the State of California, because this
27 is a civil action wherein the matter in controversy, exclusive of interest, exceeds the jurisdictional
28 amount.

1 **FIRST CAUSE OF ACTION**

2 **Violations Of Bus. & Prof. Code, § 17200**

3 **By Plaintiff Against All Defendants**

4 16. Plaintiff hereby incorporate by reference as if fully set forth all of the statements and
5 allegations contained in paragraph 1 through 15 above.

6 17. Defendants, and each of them, have violated and continue to violate Business and
7 Professions Code Section 17200 by engaging in unfair and fraudulent business practices that include,
8 but are not limited to:

9 a. Fraudulently using Plaintiff's name, image, and likeness to sell fraudulent
10 products;

11 b. Representing to general public that they have the right to use Plaintiff's name,
12 image, and likeness to sell their fraudulent products;

13 c. Actually, using Plaintiff's name, image, and likeness to sell Defendants'
14 fraudulent products.

15 d. In doing so causing loss of goodwill and reputation to Plaintiff thus damaging
16 her career and endorsement opportunities.

17 18. Defendants' conduct, as alleged herein, has been and continues to be unfair and harmful
18 to television personalities, public figures, and to the general public.

19 19. Defendants' activities, as alleged herein, constitute unfair business acts and practices
20 in violation of California Business & Professions Code § 17200 et seq.

21 20. As a direct and proximate result of the Defendants' conduct, Defendants have received
22 and continue to receive ill-gotten gains that rightfully belong to Plaintiff and/or members of general
23 public who have been adversely affected by said conduct. Defendants have been and will continue to
24 be unjustly enriched at the expense of Plaintiff.

25 **PRAYER FOR RELIEF**

26 1. A permanent injunction pursuant to Business and Professions Code section
27 17203 restraining and enjoining defendant from continuing the acts of unfair competition set forth
28 above;

1 2. During the pendency of this action, a preliminary injunction issue pursuant to Business
2 and Professions Code section 17203 to enjoin and restrain Defendants from the acts of unfair
3 competition set forth above;

4 3. Defendants be ordered to restore to the public all funds acquired by the acts of unfair
5 competition set forth above pursuant to Business and Professions Code section 17203;

6 4. Punitive damages according to proof;

7 5. Reasonable attorney's fees and costs of suit.

8 6. Such other and further relief that the Court deems appropriate and just.

9
10 DATED: July 8, 2021

BEITCHMAN & ZEKIAN, P.C.

11
12 By: 

David P. Beitchman
Paul Tokar,
Attorneys for Plaintiff,
Shannon Beador

EXHIBIT “A”

11:29



VOGUE.FR

As Princess Charlotte turns 5, here are her most adorable outfits

36K

853 Comments 421 Shares

Like

Comment

Share

Alison Deverian was tagged.



Remy Zagorski is with **Alison Deverian** and 7 others.

30m ·

With this supplement and the corresponding diet plan, I lost nearly 13 pounds in two weeks! I recommend it to my friends and family!>>><https://is.gd/TXoyb1v3ZpFUpgL44>

