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 2 AEllis | Seaside Boudoir
 3 seasideboudoir@pm.me
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5 **UNITED STATES DISTRICT COURT**
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 8 **DISTRICT OF CALIFORNIA**
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<p>12 AELLIS O. DBA SEASIDE BOUDOIR, 13 14 Plaintiff, 15 vs. 16 KELLI MARIE CONNOR DBA KELLI 17 MARIE PHOTOGRAPHY DBA 18 BOUDOIR BY KELLI, JILL LEUER, 19 GOOGLE LLC, 20 Defendants. 21 22 23 24 25 26 27 28</p>	<p>Case No.: <u>'22CV0200 JLS WVG</u></p> <p>COMPLAINT</p> <ol style="list-style-type: none"> 1. LIBEL 2. CONSPIRACY 3. BREACH OF CONTRACT 4. FEDERAL FALSE ADVERTISING AND UNFAIR COMPETITION 5. VIOLATION OF CALIFORNIA UNFAIR COMPETITION LAW 6. UNJUST ENRICHMENT <p>JURY TRIAL DEMANDED</p>
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I. Plaintiff AEllis is a well recognized photographer and artist with international publications and sales and a nationally recognized brand name of "Seaside Boudoir" for one of his lines of photographic art based out of southern California, with a constitutionally guaranteed right to the pursuit of happiness

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2 which includes the rights to be safe and secure in his person, property, and lawful
3 commerce activities to extend and further his property interests.

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5 **II.** Defendant Kelli Marie Connor is an individual and purported
6 photographer who has registered trade names of Kelli Marie Photography and
7 Boudoir by Kelli, believed to be a dba of Kelli Marie Photography, in the state of
8 New Hampshire, with a principal stated business address of 29 PARADE ROAD,
9 Deerfield, NH, 03037, USA.

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11 **III.** Defendant Jill Leuer is an individual purported photographer and
12 resident of Tonawanda, New York.

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14 **IV.** Defendant Google LLC (“Google”) is a limited liability company
15 organized and existing under the laws of the State of Delaware, and is
16 headquartered in Mountain View, California. Google is owned by Alphabet Inc., a
17 publicly traded company incorporated and existing under the laws of the State of
18 Delaware and headquartered in Mountain View, California. Google engages in,
19 and its activities substantially affect, interstate trade and commerce. Google
20 provides a range of products and services that are marketed, distributed, and
21 offered to consumers throughout the United States, across state lines, and
22 internationally.

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26 **V.** This court holds jurisdiction based on: the diversity of citizenship of the
27 parties in suit, the fact that the related events pertain to interstate commerce,
28 personal jurisdiction over defendant Google, without whom many of the key acts
of the complaint could not have been orchestrated, effected, or continue, 28 USC
1332, and 28 USC 1367 to hear otherwise state claims.

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4 **COMPLAINT**
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6 **VI.** Plaintiff hereby brings action for damages in equity against named
7 defendants for:
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9 **A. LIBEL:** defendants' direct and indirect acts of libel, harassment, and
10 commercial damages therefrom including loss of opportunity, loss of
11 commerce, loss of revenue, and loss of reputation as well as the resulting
12 ongoing mental anguish, emotional distress, and perpetual injury to his
13 reputation and business endeavors that have deprived him of revenue and
14 prospects.
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17 **B. CONSPIRACY:** Defendants conspired to deprive plaintiff of his
18 constitutionally guaranteed right to be safe and secure in his person,
19 property, and pursue lawful property interests by and thru lawful
20 commerce, and defendants did act to further that conspiracy and cause
21 perpetual injury to plaintiff by: posting and publication of false
22 statements against plaintiff, and by encouraging others to post and
23 publish false statements against plaintiff to hinder these rights in
24 violation of 42 USC 1985(2).¹
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27 **C. BREACH OF CONTRACT:** Google's written and published policies
28 and Terms of Service constitute a written and binding contract on all
parties herein for the use of Google platforms and services; this contract
is drafted and altered at will by Google, and as the drafter of the terms of
the contract between it and plaintiff, the terms should be construed

¹ See Exhibit #A-1: all elements of conspiracy proven, with "20" yet unidentified members.

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2 against the company; as set forth below defendants refuse to comply
3 with the terms of said contract(s), have themselves violated the express
4 terms of these contracts, said violation(s) are intentional and willful, and
5 these violations have caused plaintiff loss(es) as result of these breaches.
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8 **D. FEDERAL FALSE ADVERTISING AND UNFAIR**

9 **COMPETITION:** (LANHAM ACT § 43(A)(1)(B), 15 U.S.C. §
10 1125(A)(1)(B)): Defendants have published deliberate false and
11 misleading representations concerning plaintiff AEllis' personal and
12 professional activities in commerce, namely: his "stealing" photographs
13 or images from defendant Connor, inducement of underage models, and
14 other false claims; defendants' false claims have deceived and are very
15 likely to deceive consumers regarding plaintiff's professional services
16 and cause them to avoid patronage of plaintiff's professional practices,
17 these defamatory statements were disseminated in interstate commerce,
18 in commercial advertising by Google, are clear and apparent were
19 intended for defamatory effect, and have and continue to harm plaintiff's
20 ability to retain and expand his professional audience and clientele.
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23 **E. VIOLATION OF CALIFORNIA UNFAIR COMPETITION LAW:**

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25 Defendants' actions at a minimum violated Cal. Bus. & Prof. Code §
26 17200 ("UCL") which prohibits "any unlawful, unfair or fraudulent
27 business act or practice and unfair, deceptive, untrue or misleading
28 advertising and any act prohibited. Defendants stated and published as
nominal peer(s) and competitor(s) that plaintiff was engaged in stealing
images from Kelli Marie Connor and inducing adult activities with
underage women; which same did deter and discourage other adult

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2 women from communicating with, patroning, or lawfully transacting
3 with plaintiff, causing economic loss to plaintiff.
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5 **F. UNJUST ENRICHMENT:** To the extent that Google received
6 advertising dollars and revenue from defendant(s) Connor or Leuer for
7 its deliberate bias in publications, while also in deliberate breach and
8 violation of its contracts with plaintiff, and while publishing false and
9 defamatory statements in violation of those contracts with all parties,
10 Google did benefit from its illegal conduct against plaintiff as noted
11 herein and plaintiff is entitled to restitution for same benefits and their
12 relative benefit to plaintiff had they been in his favor.
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17 **VII.** Defendants' actions have persisted since at least July 2021 and continue
18 now without cessation. Rather, defendant(s) have escalated and diversified their
19 known false attacks upon plaintiff, his brand, and reputation, all while continuing
20 to operate advertised unlawful corporate policies and practices of their own that
21 include Connor's deliberate unlawful discrimination, and with continual violations
22 of defendant Google's published and required terms of service, which Google has
23 refused and now refuses to enforce and thereby waives any claims of immunity
24 due to their wilful and deliberate knowing participation in the publication of these
25 deliberate acts of libel. These acts of libel include but are not limited to deliberate
26 false statements with malicious intent published by Google across its platforms
27 and are in no way protected forms of speech but known false statements delivered
28 and published with malicious, hateful, dedicated, and determined unlawful intent,
which same violate a number of state and federal civil and criminal statutes as well
as extending to epitomize the rash of unlawful "cancel culture" unreasoning mob

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2 attacks that have swept the nation in response to recent leftist attacks on society
3 and our national dialogues. Defendants conspired to deprive plaintiff of his lawful
4 constitutional guaranteed rights to be secure in his person, privacy, property, and to
5 engage in lawful commerce by and thru their deliberate false published statements
6 intended to deprive him of business opportunity and revenue and by their own
7 declaration force him out of business, contrary to law.
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13 **NATURE OF THE ACTION**

14 **VIII.** Any business must find an effective path to consumers for it to be
15 successful. In recent years Google has accounted for nearly 90 percent of all
16 general-search-engine queries in the United States, and almost 95 percent of
17 queries on mobile devices. It is therefore by far the most successful platform for
18 any business marketing effort or strategy available today and also an unavoidable
19 platform, whether as a monopoly or otherwise, it has the single largest voice that
20 provides any merchant an opportunity to appeal and present to consumers in any
21 marketplace in the nation. Google has foreclosed competition for internet searches
22 to such a degree in this country that general search engine competitors have no real
23 chance to challenge Google and thereby force both merchants and consumers to
24 deal with Google on Google's terms. Google is so dominant that "Google" is not
25 only a noun to identify the company and the Google search engine but also a verb
26 that means to search the internet. Google uses this clout to require and demand
27 unwavering compliance with whatever terms of service it decides apply to any and
28 all of its products derived from its robust search based platforms, which same
terms of service and related policies constitute a binding written contract. Yet

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2 Google does not honor these same terms itself, again by virtue of it being so large
3 no one can avoid it or tell it “no” as one might in another normal sense of
4 commerce or economic exchange. Likewise, what Google chooses to promote,
5 promulgate, or advertise is unavoidable and cannot be concealed from the market,
6 whether true or false. And Google in effect provides no way to dispute its
7 decisions on what information it publishes against a person or business. Further,
8 Google chooses to enforce or not enforce its stated and published policies in a very
9 inequitable and unjust manner.
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13 **IX.** Defendant Kelli Marie Connor operates a line of business in New
14 Hampshire parallel to plaintiff’s Seaside Boudoir brand of photography in southern
15 California, and further claims to educate others who aspire to operate such a
16 business for themselves anywhere in the nation. Connor reports her studios
17 produce “seven figure annual revenue” to attract more students who spend
18 significant sums for her advice and teaching, with these documents priced from
19 \$699 for an approximately ninety page document into the thousands of dollars².
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22 **X.** AEllis returned to the United States and began the Seaside Boudoir
23 photography brand after consulting and researching a number of related peers,
24 groups, and educators in a variety of photographic arts with which he was familiar
25 and experienced. In doing so, he encountered Connor, who provided him a number
26 of materials, documents, and information meant to tease and entice him into
27 spending the outrageous sums she requested for tutelage from her established
28 brand, which overtures plaintiff ultimately rejected in favor of peers more
compatible and of comparable quality whom plaintiff deemed less predatory, less
narcissistic, more professional, and relatable. Connor makes it clear throughout her

² <https://kelliconnor.podia.com/posing-guides-apps> accessed December 16, 2021. Photo shoots with Connor or her staff also cost clients several thousand dollars to assuage Connor’s unquenchable ego.

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2 indoctrination efforts that all materials, methods, and practices she supplies to
3 students and prospective students are for use and or adaptation as desired by the
4 student or prospect. These permissions are clear, express, and explicit.
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6 **XI.** Photographers maintain a number of peer forums and networks whereby
7 they encourage and promote their arts, knowledge, and share both artistic and
8 business tips and strategies with their peers and hopeful or aspiring peers. These
9 include online peer Facebook groups. In June or July 2021, plaintiff shared in one
10 such forum a tip to another photographer who seemed to take unintended offense,
11 and as it turns out, in addition to being postpartum, why she stated she sought
12 advice in the first place, was in some fashion also related to defendant Connor.
13 Immediately thereafter, defendant Connor began a personal “cancel culture”
14 campaign against plaintiff across a number of platforms.
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18 **XII.** Defendants know from personal experience that this particular niche of
19 photography is extremely sensitive to a practitioner’s personal reputation.
20 Defendants’s acts of libel have historically included publication of known false
21 statements alleging theft of Kelli Marie Connor’s photographs by plaintiff to
22 induce business from underage females. In doing so, defendants’ had full knowing
23 intent to damage and destroy plaintiff’s reputation, credibility, and any potential
24 trust with his local clientele, even though these same clientele were likely never
25 potential clients of defendants’ for any similar product or service as the
26 overwhelming majority of consumers find and utilize a practitioner through a local
27 search for a practitioner, most often through Google, or via word of mouth from
28 other local consumers.

XIII. Defendants have undertaken a persistent campaign of malicious
harassment, slander, and defamation against plaintiff designed and intended to, in

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2 defendant Connor's own words "drive [plaintiff] out of business forever." These
3 acts have included acts in violation of defendant Google LLC's published policies
4 and procedures³, violating Google's prohibitions against "Conflict of Interest,"
5 "Spam and Fake Content" (including use of fake profile(s) by Kelli Marie Connor
6 et al.), and "Off-Topic" as stated and set forth in their published policies. These
7 facts make this a deliberate and or malicious act by Google LLC et al., to the
8 injury and loss or deprivation of AEllis and Seaside Boudoir as Google has
9 repeatedly been notified of these violations and has refused to enforce its own
10 policies or remove the content they have published that constitutes libel and the
11 subject of this suit. This is not therefore a claim that is exempt from damages
12 under Section 230 of the Communications Decency Act of 1996, as defendant
13 Google LLC has violated its published policies, procedures, and terms of service
14 with deliberate knowledge and intent, breached its consumer contract, and has
15 made an active deliberate and conscious choice to publish, allow, further, promote,
16 and continue to publish these deliberate acts of libel initiated by defendant Connor
17 after being presented with facts and evidence that defendant Connor's activity
18 violated Google's own terms of service, which are supposed to be a fundamental
19 prerequisite to making any publication whatsoever on Google's platforms. These
20 became conscious and deliberate acts of defamation and libel by Google and not a
21 passive hands off misuse of their technological platform as they cannot claim to
22 have been unaware of Connor's deliberate violations of their terms of service and
23 published policies governing the use of their platform due to plaintiff's repeated
24 confrontation of defendant Google LLC on all of these matters. Yet following this
25 same confrontation, Google made repetitive deliberate and conscious decisions to
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³ <https://support.google.com/contributionpolicy/answer/7400114>

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2 publish in public the known false and defamatory information against plaintiff, to
3 the injury of plaintiff.
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5 **XIV.** Defendant Connor personally harassed plaintiff with derogatory remarks
6 and comments on several platforms: Facebook, Instagram, Yelp, Google, and
7 others. In those comments and remarks, defendant Connor raised a variety of
8 allusory and false claims against plaintiff without offering an iota of proof for any
9 claim made. This harassment spread from Connor's personal harassment to a wave
10 of "cancel culture" efforts as supposed peers responded out of emotion devoid of
11 reasoned analysis to Connor's false statements. Thereafter a mob mentality began
12 to take hold in the related photographic niche community⁴, but not the larger
13 photographic communities, and Connor encouraged this behavior with repetition
14 of her known false statements.
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18 **XV.** When confronted by plaintiff, some parties who repeated Connor's false
19 statements and claims without any knowledge of or contact with plaintiff apart
20 from Connor's incitement reported to plaintiff that Connor had offered them or
21 their spouse \$50 incentives or discounts in return for repeating her false narrative
22 against plaintiff in a public review, such as on Google, Facebook, or Yelp.
23 Countless individuals accepted this reported incentive and plaintiff's Facebook
24 business page⁵, Google Business listing⁶, Instagram account⁷, and other advertising
25 platforms were flooded with false and hateful declarations which included
26 widespread threats of violence, harm, and even threats against plaintiff's life, with
27 repetitions of Connor's original false claims related to theft and pedophilia.
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⁴ Commented on with confirmation of intent in writing by private taunts from Connor's associate Jessica Ketter on December 19, 2021.

⁵ <https://www.facebook.com/boudoir007>

⁶ <https://goo.gl/maps/nCiVMPcbARdneO186>

⁷ <https://www.instagram.com/seasideboudoir>

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2 Behavior by Connor and those she influenced that rose to felony criminal levels,
3 all at the instigation and incitement of defendant Connor.
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5 **XVI.** As a result of these behaviors, plaintiff's original business platform on
6 Instagram remains inaccessible and several other participants in this "cancel
7 culture" campaign Connor incited against plaintiff lost temporary access to their
8 accounts for a month or more while Instagram researched the flood of hate
9 messages and threats against plaintiff, who had blocked more than fifty unique
10 individuals prior to Instagram's own censure of these illegal activities. Connor
11 however continued her unlawful harassment and slander of plaintiff with known
12 false statements on other platforms, knowing all along that key details of her
13 statements were false, deliberate lies told by her to inflame public opinion against
14 plaintiff in part based on his masculine gender and his opposition to her egotistical
15 behavior, peer influence⁸, and predatory practices upon both her clients and peers.
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19 **XVII.** In response to these attacks, Plaintiff learned how to restrict unsolicited
20 public comments on his Facebook page to minimize the effects of this harassment,
21 began new Instagram pages, and attempted to continue his business and ignore
22 Connor and her efforts, after issuing a written warning to her against pursuing him,
23 in light of the threats against his life made on her behalf, and in at least two
24 instances, declared as being made on Connor's behalf and at her urging.
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28 **XVIII.** Connor's harassment and knowing false statements were published and
promoted across numerous platforms, including Google, Facebook, Instagram, and
Yelp, all contrary to the published terms of service and policies of each and every
one of those platforms. Unlike other platforms, Google, when informed in detail of

⁸ Plaintiff has made comments to peers in private discussion based on his interactions with and observations of Connor that he felt Connor was a sexual predator and maintains that personal opinion to this day. It is plaintiff's personal belief that another party relayed one or more of these opinions back to Connor, and this may be the origin of her deliberate false allegations of pedophilia.

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2 the situation and circumstances and the terms of service violations, refused to act
3 to remove the public false declaration of defendant Connor and thus violated its
4 own published policies, procedures, and terms of service. In violating its own
5 policies and terms of service, defendant Google transitioned to the role of
6 deliberate publisher of these acts of libel and waived any immunity claim(s) of an
7 independent third party platform with its knowing and willful continued
8 publication of these false declarations and libellous statements. Google not only
9 allowed Connor and others to author such statements contrary its published
10 policies and terms of service against plaintiff, Google made a deliberate and willful
11 decision not to remove those statements, on multiple occasions⁹. These facts make
12 Google's publication and promulgation of acts of libel initially authored by Connor
13 a deliberate and malicious act of publication by Google to the injury and loss of
14 AEllis and Seaside Boudoir, which waives any third-party immunity claim that
15 Google might otherwise attempt to utilize under Section 230: once notified of the
16 violation(s), Google made a conscious and deliberate choice, *contrary to their own*
17 *stated policies and procedures*, to continue to publish these known false statements
18 and Google continued these same active publishing efforts that Google had reason
19 to know or believe were false, on a platform and medium which Google had
20 complete control over, even after being served Notice of these claims and future
21 litigation on multiple occasions up to and through late November 2021.
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XIX. Further, when plaintiff personally posted a negative review against Connor and her trade name, citing her misconduct, harassment, unlawful conduct, unlawful employment and discrimination policies and activities, Google promptly

⁹ One such statement by Connor eventually faded from sight due to a separate error by Google in duplicating plaintiff's business listing, when Google removed one of the listings. Connor then promptly posted another false claim on the remaining business listing. See attached Exhibit #A-1.

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2 removed that negative review, to placate Connor and preserve her perfect five star
3 rating on their same platform. Herein Google again showed deliberate intent to
4 further Connor's personal goals and agenda, violated its published terms of service
5 and policies, with a conscious and deliberate act that waived any third party
6 platform immunity claim of not being an active and conscious publisher by and
7 thru its active and knowing deliberate participation and having been afforded an
8 opportunity to correct its behavior in accord with its own published policies and
9 procedures. Google elected not to enforce or abide by its stated and published
10 policies but proactively sided with Connor and thereby encouraged and escalated
11 her unlawful conduct towards plaintiff with further and repeat acts of libel against
12 plaintiff in its continued deliberate broad publication of known false statements.
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17 **XX.** Google furthered its own direct participation in related misconduct
18 against plaintiff when on or about these same times Google ceased to display to
19 consumer any related photos of plaintiff's business or products on the related
20 Google business profile listing(s) for plaintiff, despite repeated attempts to display
21 more than 75 relevant images showcasing plaintiff's work. Google instead shows a
22 single ugly street image of a nearby street scene that in no way encourages anyone
23 to visit or inquire for any related business matter. Google continues this refusal to
24 display any image(s) related to plaintiff's work products despite numerous
25 contacts, inquiries, and customer and marketing partners' attempts at posting their
26 own photos to be associated with plaintiff's business due to their satisfaction with
27 his products and desire to promote his services and products to others. This
28 unexplained deliberate censorship of plaintiff and continued promotion of Connor
cannot be ignored in the context of Google's deliberate libel against plaintiff in
cooperation with Connor and her colleagues.

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2 **XXI.** Connor’s harassment of plaintiff continued unabated, even after plaintiff
3 added restrictions on who could comment or contact him on his various platforms,
4 despite knowing that these same measures must by necessity throttle his business
5 prospects as he had no way to exclusively restrict or censure unknown antagonists
6 incited by Connor to contact and harass him without also restricting possible
7 business clients from likewise contacting him for legitimate economic exchanges.
8 As a result, plaintiff suffered loss of economic and business opportunities, as well
9 as actual lost revenue, exacerbated by the necessity of plaintiff taking time away
10 from productive efforts to stymie and combat the constant harassment by Connor
11 and those associated with or recruited by her.
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15 **XXII.** Plaintiff issued a Cease and Desist notice to defendants Connor and
16 Google November 18, 2021¹⁰, noting plaintiff’s intent to seek damages if
17 defendant Connor failed to end all of her harassment and efforts against plaintiff at
18 once and remove all of her false posted claims against him as well as those posted
19 by others on her behalf or at her request. Connor responded two days after the
20 notice was electronically delivered to her with increased threats and harassment
21 from a number of individuals familiar to Connor, several of which remain posted
22 and visible to the public on Google and Yelp platforms, posted from November
23 20th thru 23rd inclusive on those platforms¹¹, all of which reference a false claim
24 of “stealing” from Kelli Marie Connor and attempting to warn prospective clients
25 away from plaintiff’s business. As with the direct complaints, threats, and
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¹⁰ Google received multiple email and electronic copies, with an additional written copy by mail.

¹¹ Including but not limited to all of those in attached Exhibits, e.g.

<https://goo.gl/maps/BbqtpFcxfgPD9if76>; <https://goo.gl/maps/FqN5JZCHysBED4zT8>;

<https://goo.gl/maps/2SUNZd9U9Lbhj1CO6>; <https://goo.gl/maps/3CxXSkmT3sp8ekZ96>;

<https://goo.gl/maps/hxRkUxDzqqjCYnCE6>; a 1-star review (no sharable link provided) by “Sebastian Guillory,” as well as by related party “Laura Keeton” on December 18, 2021, as well as any and all review(s) attributable to Kelli Marie Connor herself and fake appointments to harass. These false statements reached the public and were acted upon as far away as Australia. Copies attached as Exhibit #A-2.

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2 harassment by Connor herself, when Google was contacted through both formal
3 and informal channels, defendant Google made a conscious effort to publish,
4 promote, endorse, participate, and encourage defendant Connor and her
5 associates's deliberate acts of libel against plaintiff, which remain posted, live,
6 visible to the public on multiple Google and Yelp products and platforms to this
7 day, though it should be noted Yelp took deliberate steps to evaluate the claims and
8 minimize and mitigate any effect and visibility of these knowing false claims,
9 while Google persists in promoting them unchanged and quite visible on all of its
10 platforms, to the detriment of plaintiff and his business.

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14 **XXIII.** Defendant Jill Leuer, an aspiring photographer who has idolized Connor
15 due to Connor's purported successes, provides further evidence of these activities.
16 In late November 2021, approximately the same time that Connor's close friends
17 and family renewed their escalated harassment of plaintiff, defendant Leuer
18 furthered these efforts herself by posting in Facebook groups with photographers
19 in them that might operate within the same niche as plaintiff and herself. Leuer
20 posted statements she knew or had good reason to know were false within these
21 Facebook groups, without realizing these posts would reach plaintiff¹². Plaintiff
22 thereafter researched to determine if he had ever had any contact with this
23 naysayer and learned the only common denominator was defendant Connor, who
24 had been for months included knowing false declarations alleging "stealing
25 photos" and pedophilia in her harassment of plaintiff, claims repeated by Leuer, as
26 they have been by many other parties taking Connor's claims at face value without
27 any inquiry, research, or critical thought whatsoever. When confronted by plaintiff
28 with a demand to cease and desist or face legal action, defendant Leuer denied all

¹² See one such post, attached, included in Exhibit #A-3.

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2 knowledge of plaintiff, who he was, or any prior contact with him whatsoever, the
3 only truth she ever told any party in related matters¹³. Note that Connor also said
4 the same when confronted in a public forum¹⁴. Defendant Leuer then mirrored and
5 repeated her codefendant Connor's own behavior, with her own friends and family
6 publicly denouncing plaintiff in public forums and insisting the parties had no
7 prior contact, interaction, or exchange, and denying the fact of Leuer's prior
8 misconduct indicated from Facebook's records and images Leuer had uploaded to
9 her personal page that remove any doubt as to her identity as the responsible party
10 publishing false posts constituting libel within Facebook group forums with the
11 apparent and obvious intent to harm plaintiff's business endeavors and reputation.
12 Leuer persisted in her misconduct despite being given multiple written
13 opportunities to avoid this litigation.
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18 **XXIV.** About this same time, in November 2021, Connor revealed that she was
19 behind all of these ongoing efforts against plaintiff, not only through her own
20 posts, the content of which was repeated in part in each of her associates' postings
21 hostile and adverse to plaintiff and his business, but also by revealing she was the
22 influence who placed extreme pressure on a number of niche photography peer
23 groups to expel, sever all ties with, and otherwise ostracize plaintiff, depriving him
24 of creative resources, networking, educational, and referral opportunities. Her
25 intimidation of others to these ends resulted in even a nominal mentor of
26 plaintiff's, one Michael Sasser of Sasser Stills Boudoir, to sever ties and distance
27 himself from plaintiff in order to alleviate her and her associates' harassment of
28 Sasser and his continued association with plaintiff. The result of Connor's bullying
and intimidation of supposed peers in her industry has been aimed all along at

¹³ See attached Exhibit #A-3.

¹⁴ See attached Exhibit #A-1.

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2 ostracizing plaintiff from the community of similar entrepreneurs, badmouthing
3 him to such a degree that no clients would likely trust him for their professional
4 services, and deprive plaintiff of income and opportunity until he abandoned his
5 enterprises. As Connor's efforts to these ends are clearly unlawful and exceed any
6 reason or legal right in addition to violating all applicable laws, both civil and
7 criminal, Connor and her complicit codefendants must be held accountable for all
8 such losses of opportunity and revenue until such time plaintiff has recovered in
9 full from the damages they have caused to plaintiff by and thru their conscious and
10 deliberate adverse and unlawful efforts.
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14 **XXV.** False and libellous claims against plaintiff and his business continue to
15 be posted, published, and promoted by defendants Google and Connor, with
16 content and circumstances that reveal them to be part of Connor's unlawful terror
17 campaign against plaintiff and his lawful business endeavors, initiated under her
18 influence as deliberate acts of libel which defendant Google deliberately continues
19 to publish despite repeated provision to Google by plaintiff of sound information
20 that they violate extant law, are false, and violate multiple terms of Google's
21 policies and terms of service, which comprise a binding contract with all parties.
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25 **XXVI.** It is of interest to note that despite the content and clear intent of these
26 posted false statements published by Google, Connor, Leuer, and others familiar to
27 and working in concert with them, each and every time plaintiff AEllis contacted
28 them about their misconduct in a public fashion these same defendants claimed
"not to know who he was." This evidences the fact that they knew that their own
statements which initiated his communication with them to be false and malicious
in nature, indefensible under any reasoned scrutiny. Each defendant instead of

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defending or justifying their conduct denied they had interacted with AEllis or his interests at all, contrary to the evidence at hand.

REQUEST FOR RELIEF

Plaintiff now seeks:

- A) Declaration that defendant's terror tactics are and were in fact unlawful;
- B) Injunction ordering the permanent and total removal by defendants from all platforms of all such related statements constituting acts of libel or slander against plaintiff;
- C) Injunction enjoining defendants from engaging in any and all further harassing acts against plaintiff with penalties for future violations;
- D) Injunction to defendant Google for its unending unbiased future promotion of plaintiff and his business endeavors without censure or violation of its own published terms of service applicable to all businesses, to include full public view of posted relevant images of plaintiff's products and services in line with other similar practitioners;
- E) Compensatory monetary damages to fully compensate AEllis for the permanent harm, emotional distress, mental anguish, loss of business, loss of opportunity, and loss of reputation suffered as a result of the defendants' public and false attacks in a minimum amount of fifteen million dollars (\$15,000,000);
- F) Punitive monetary damages in the amount of seventy-five million dollars (\$75,000,000) for the unlawful egregious misconduct of defendants to punish them for the permanent and indelible nature of these false statements and the deliberate injury that they caused and to deter defendants and those who follow them from engaging in such unconscionable and lawless behavior towards plaintiff or anyone else
- G) Costs and expenses related to this action against defendants;

- H) Enter any other preliminary or permanent relief necessary and appropriate to restore competitive conditions in the markets affected by Google's unlawful conduct;
- I) Enter any additional relief the Court finds just and proper.

RESPECTFULLY SUBMITTED THIS 9th DAY OF February,
2022.



/s./ AELLIS O. SEASIDE BOUDOIR,
pro se

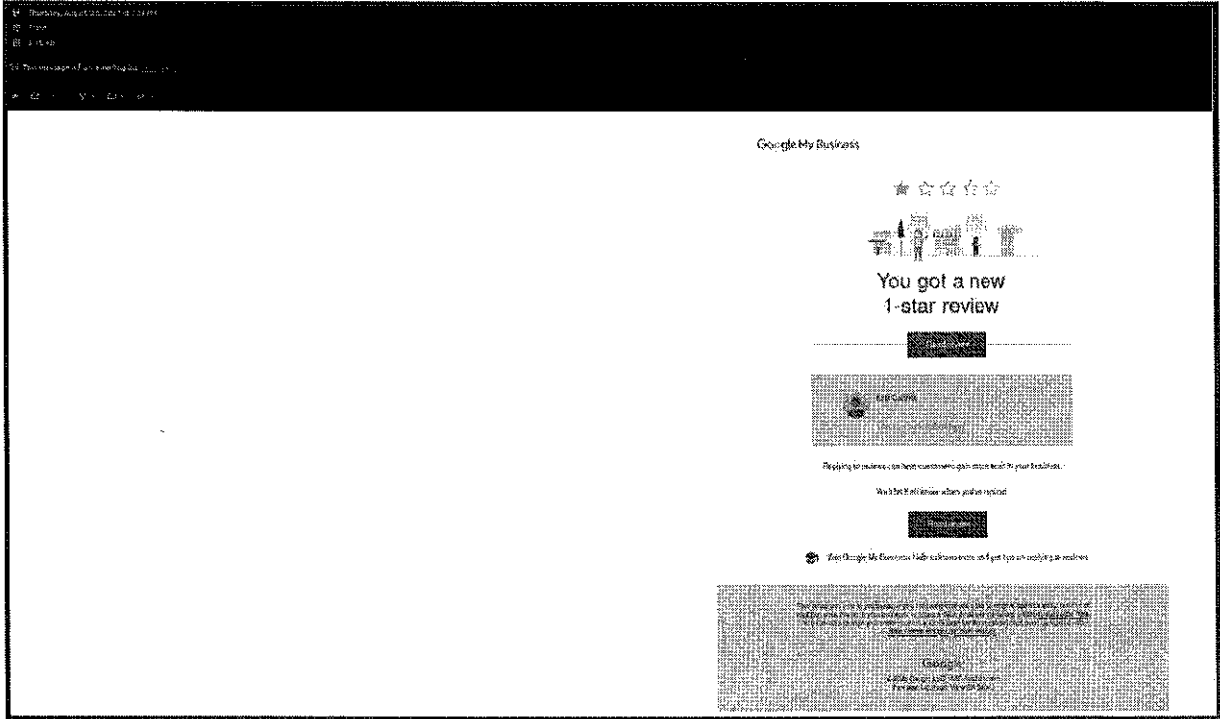
seasideboudoir@pm.me *
(808)800-7477
2037 S Coast Hwy
Laguna Beach, CA 92651

* Notice(s) to be provided to email address above.
address above being vacated due to isolation & hours of operation

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EXHIBIT #A-1

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Google Business Profile Manager

Seaside Boudoir
2677 S Coast Hwy
Laguna Beach, CA 92651

- Home
- Posts
- Info
- Insights
- Reviews
- Messages
- Photos
- Bookings
- Products

show customers you care, one response at a time

Your customers most get notified when you reply to their review

All Replied Haven't replied

Kelli Connor
2 months ago · 5 weeks ago
"Aellis" aka "Seaside Boudoir" aka "Art by Aellis" has been STEALING from me consistently, across all of his platforms... More

Seaside Boudoir (owner)
2 weeks ago
Fascinating comment from someone who cant even see any of them due to months of harassment. Yet another act of libel by the notorious Kelli Connor, and another example of why women should be more wary and careful about a female photographer, not less. There is nothing inherently trustworthy in a female photographer, as this stalker proves. Legal Notice (to commence legal proceedings) served on her November 18 & 20, 2021 following additional acts of harassment and violence by this party against AEllis and Seaside Boudoir.

Edit Delete

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Willow Tree Photography By Alicia Miller
December 17 at 2:51 pm · 🌐

My heart is broken that I have to do this, but this creep stole an image from my Instagram and posted it on his website. By leaving a review on his page to remove my image, he left one-star reviews with all the fake profiles he has. Currently, there are about 20 of us in the Boudoir industry who he is harassing due to us coming forward to him about stealing our content, he is not a nice person, and the threats he has sent these women are scary. He is leaving horrible reviews filled with lies and anything to continue the harassment.

I would like to do my best to build my google reviews back up with genuine, honest testimonials. For me to have to deal with this is like a slap in the face because this man has no idea how hard I work.

If you have worked with me previously in any form of a session, please give me a real and honest review. Thank you from the bottom of my heart!

<https://g.page/i/CZldys16qMZqEAg/review>

👍👍👍 27 12 Comments 2 Shares

Jessica Ketter ▾

No, you don't. But nice bluff. I wondered why she posted a weird photo somewhere.

And you should get better friends. That aren't criminals who choose the wrong person to mess with.

Linfaa ok bud. Pics that we have say otherwise and it shows HER photo on YOUR website. Keep trying to play dumb. 🤔

6:12 📶

<https://m.facebook.com>

facebook

We received your information

If we still find that your account didn't follow our Community Standards, it will remain disabled.

We're always looking out for the security of people on Facebook, so until then you can't use your account.

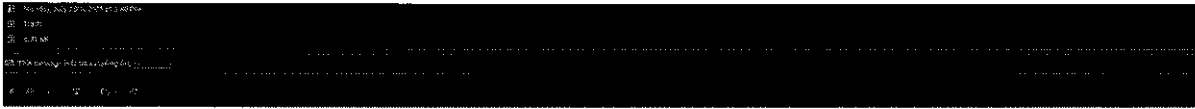
Log out from AGILIS D'AMISAN

Download Your Information

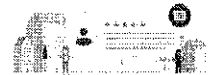
English (US)	Español
Français (France)	中文(简体)
Português (Brasil)	Deutsch
Italiano	+

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EXHIBIT #A-2



Google My Business



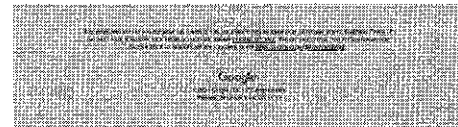
We have reviewed your removal request

Thank you for contacting your content. We have assessed the review and found it to be a violation of our policies. Due to this, we have actioned your content.

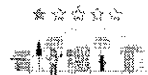
Be safe.
Be smart.
This isn't any other address.

Report Google
Down
Not a violation of a policy and more so. This is a normal address and is not a violation of any policy.

Need any help? Visit Google My Business Help at [https://www.google.com/business/help](#)



Google My Business



You got a new 1-star review



Reviewing on Google My Business is a great way to get feedback on your business.

When you receive a review, you can:

Get Google My Business Help at [https://www.google.com/business/help](#)

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Eric M.

From Copperas Cove, TX

52 Friends 1 Review 0 Photos

Eric's Profile

- Profile Overview
- Friends
- Reviews
- Compliments
- Collections

Report this profile

Block Eric M.

Reviews

Sort by: Date ▾



Seaside Boudoir
Boudoir Photography
Laguna Beach, CA 92651

11/20/2021

It's a real shame to see someone's work stolen. I'd highly recommend straying away from this "artist." Take your time and find a photographer that can truly recreate astounding imagines and capture your true beauty.

This photographer will steal images from renowned artists all over the country and pretend they're his.

DO NOT. I REPEAT. DO NOT USE THIS PHOTOGRAPHER.

Was this review ...?

Useful Funny Cool



Comment from AEllis O. of Seaside Boudoir
Business Owner

11/20/2021 · If such were true, you would have posted an example,

Google Business Profile Manager

Seaside Boudoir
2037 S Coast Hwy
Laguna Beach, CA 92651

- Home
- Posts
- Info
- Insights
- Reviews
- Messages
- Photos
- Bookings
- Products



Eric Miller

2 days ago

Stealing renowned photographers work is in poor taste. I'd highly recommend looking elsewhere and find someone that... More



Seaside Boudoir (owner)

Just now

If such were true, you would have posted an example, but you don't and won't. Nor do you have the models or original files, I do.

You have violated Google's terms by filing a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against Kelli Marie but will be an exhibit in that suit. Thank you for contributing to the lawsuit against Kelli Marie Connor for her illegal practices.

Follow up to the "add on" libel: You and your wife posting deliberate defamatory lies with the intent to injure my business is libel. It's also a harassment, which in this medium, constitutes a federal crime. That makes you a criminal. You're not even a photographer to my knowledge, only a relative of Kelli Marie Connor who isn't very bright given the other data I have collected on you and your wife Alicia's relationship and to Kelli Marie Connor, and you can't produce anything. You have nothing. And, I notice, you couldn't tell the truth if your life depended on it as you clearly haven't been on any of my sites, which indicates that you are one of the parties that has been blocked for months of harassment and criminal behavior. But I have saved this info and printed it, and it will be reviewed by a number of parties as we proceed to court. Perhaps I will see you there. I'll be glad to put you on the stand, as well as swear out the criminal complaint against all of you. There are no legal notices en route, except the ones that I sent to your family member Kelli Marie, to which this is one of her responses. Not very bright, or even subtle for that matter. And admissible against her in court, not that you'd understand how or why.

And the others posting aren't photographers either. I checked.



Eric M.

Copperas Cove, TX

52 friends

1 review



12/17/2021

Guy keep's changing his business account's and stealing photo's from renowned photographers. I don't care if this guy cost a dollar. Stay away at all costs.

Public Comment



https://biz.yelp.com/22/Usd6eql19yvbFjAnsbmW/

Yelp Connect

Logo

Business Highlights

Portfolio

Call to Action

Business Information

Reviews

Photos and Videos

Inbox

Check-in Offers

Deals & Gift Certificates

2 Reviews for Seaside Boudoir

You may message 1000 more customers today, and your business may make up to 10 more public comments.

Sort by: Newest First



Eric M.

Copperas Cove, TX

52 friends

1 review



11/20/2021

This "photographer" has a habit of taking photos from other renowned photographers and using them as he own.

highly recommend staying away from him and finding a real artist that can bring out the best in you.

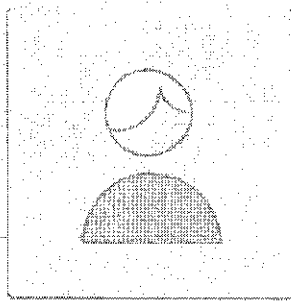
Direct Message



Comment from ABBN C. of Seaside Boudoir
Business Owner

11/29/2021 - This person is a known family member of a photographer facing legal action for months of illegal misconduct towards Seaside Boudoir and its personnel. Disregard as there isn't an iota in truth in anything he or his family members say. This will however be used as an exhibit against that photographer in court. Read Jec.

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Alicia M.

From Copperas Cove, TX

0 Friends 1 Review 0 Photos

Alicia's Profile

Profile Overview

Reviews

Compliments

Collections

Report this profile

Unblock Alicia M.

Reviews

Sort by: Date



Seaside Boudoir

Boudoir Photography
Laguna Beach, CA 92651

11/20/2021

It is such a low and unprofessional act to steal my image and display it on your website. You did not take these images, nor have you worked as hard as us professionals to build our portfolio rather than take it. 99% of his "Portfolio" is stolen material from high-end photographers working endlessly to provide high-end services and produce the work we do. DONT USE HIM.

Was this review ...?

Useful Funny Cool



Comment from AEllis O. of Seaside Boudoir

Business Owner

11/20/2021 · You have violated Yelp's terms by filling a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against

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Google Maps

11:06 [signal icons]

← Edit response ▶ ⋮

Alicia Miller November 20, 2021

★★★★★ It is such a low and unprofessional act to steal my image and display it on your website. You did not take these images, nor have you worked as hard as us p...

You have violated Google's terms by filing a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against Kelli Marie but will be an exhibit in that suit. |

Willow Tree Photography By Alici...
Photographer
PLACE DETAILS

Justice Pursuit
★★★★★ 5 days ago

Response from the owner 5 days ago
Justice Pursuit is AEllis's fake account. AEllis is the said owner of Seaside Bouqoir who has stolen content from me and about 20 other photographers to lure underage women into his business practices. This man is writing false reviews on my account due to me requesting him remove a image from his website he has stolen. This review is false as he has never worked with me.

4:21 [signal icons]

← Edit response ▶ ⋮

Theodore Sheldon

★★★★★ **!!MUST READ!!** The artwork portrayed by this person isn't always there own! They are stealing the artwork/pictures from a good friend of mine.

To the owner, you should be ashamed of yourself. Try being creative and showing what talent (if any) you have instead of stealing from the truly talented people out there!!

1) You Lie.
2) You have violated Google's terms by filing a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against Kelli Marie but will be an exhibit in that suit. Thank you for contributing to the lawsuit against Kelli Marie Connor for her illegal practices.]

November 23, 2021

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5:07 [status icons]

← Edit response [edit icons]

D David Jones November 20, 2021
★★★★★ *This user only left a rating.*

[Profile] You have violated Google's terms by filing a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against Kelli Marie but will be an exhibit in that suit. Thank you for contributing to the lawsuit against Kelli Marie Connor for her illegal practices.

11:06 [status icons]

← Edit response [edit icons]

A Austin Snider November 20, 2021
★★★★★ Fake, scam, dirt bags

[Profile] You have violated Google's terms by filing a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against Kelli Marie but will be an exhibit in that suit.

10:33 [status icons]

← Edit response [edit icons]

L Laura Keeton December 18, 2021
★★★★★ *This user only left a rating.*

[Profile] Known associate of a criminal harassing this business for months, never a customer of this business.

You have violated Google's terms by filing a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against Kelli Marie but will be an exhibit in that suit. Thank you for contributing to the lawsuit against Kelli Marie Connor for her illegal practices.

8:06 [status icons]

← Edit response [edit icons]

A Ang December 19, 2021
★★★★★ *This user only left a rating.*

[Profile] Note: fake profile, not local (this business only serves local clients) and this is a known associate of a criminal harassing this business for months, never a customer of this business.

You have violated Google's terms by filing a fake review on a business you have never done business with or even contacted. Your misconduct and harassment here will NOT deter the lawsuit against Kelli Marie but will be an exhibit in that suit against her and her associates. Thank you for contributing to the lawsuit against Kelli Marie Connor for her illegal practices.

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Monday, November 22, 2021 TODAY

11:30am - 12:00pm

Jessica Williams
Event type **No Obligation
Consultation**

Details

[Reschedule](#)
[Cancel](#)

EMAIL:
jwilliams80@yahoo.com

[Edit Event Type](#)

LOCATION 11/22/21, 10:43 AM

[Filter by Event Type](#)
[Schedule Invites
Again](#)
[Report this event](#)

https://calendly.com/app/scheduled_events/user/me
+1 254-283-6592

INVITEE TIME ZONE
Pacific Time - US & Canada

QUESTIONS

Why are you interested in a Boudoir experience with me? Please be open and honest and share some details that will help me decide if this is the right experience for you.
I've heard great things about your work. I want to step outside my comfort zone.

I am a professional. My time is valuable, the same as yours. If I adjust my calendar for this appointment, will you keep it and answer the phone when I call at the time you chose?
Yes, I will answer when you call.

EMAIL FOLLOW-UP
Scheduled to send at 4:00pm - Monday, November 22, 2021 [Cancel](#)

MEETING NOTES

No show, email is invalid. Event booked during exact same moments spate of false reviews, all from same area of Texas, also booked by family and associates of Keili Marie Connor as part of her ongoing campaign of harassment. Saved for court action.

created November 20, 2021

TIMELINE

- New event booked: jessica Williams booked a No Obligation Consultation on Nov 20, 2021 at 10:05am PST
- Has on Nov 20, 2021 at 10:05AM 10:43 AM

EXHIBIT #A-3

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Jill Leuer
delete if not allowed

Aellis Obtenebrix
<https://www.flowcode.com/page/seasideboudoir>

Websites:
www.artbyaellis.com
www.seasideboudoir.com

Instagram: artbyaellis, seaside_boudoir

Facebook: aellis d'artisan

Go check.. See if he has stolen any of your work.



AEllis *Photographer*'s Flowpage
flowcode.com

8h Like Reply



Jill Leuer
Hes got a fansly page full of nudes you have to pay for. I really hope he isnt in private groups stealing images of clients and selling them. That breaks my heart.

8h Like Reply



J. Leuer Photo
I dont even know who you are. Good day sir.

Like Reply · 7m



AEllis D'Artisan
J. Leuer Photo but you do...according to your own posts. Would you like a screenshot? I can provide one to refresh your memory

Like Reply · 6m



Write a reply...



Write a comment...

