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TMZ Productions, Inc.

DISTRICT COURT

CLARK COUNTY, NEVADA

DAN BRANDON BILZERIAN, an Individual

Plaintiff,

vs.

DIRTY WORLD, LLC, a Delaware limited liability company, d/b/a THEDIRTY.COM; HOOMAN KARAMIAN, an individual, d/b/a Nik Richie; TMZ PRODUCTIONS, INC., a California Corporation; DOES I-X, inclusive; and ROE BUSINESS ENTITIES I-X, inclusive

Defendants.

Case No.: A-15-722801-C
Dept. No.: XXXII

ANTI-SLAPP SPECIAL MOTION TO DISMISS UNDER NRS 41.660

Defendant, TMZ Productions, Inc., by and through its attorneys, Randazza Legal Group, PLLC, hereby files its Special Motion to Dismiss under NRS 41.660.

This Motion is based upon the attached memorandum of points and authorities, the papers and pleadings on file herein, and any oral argument permitted by this Court.

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NOTICE OF MOTION

To: Brian W. Boschee, attorney for

Plaintiff Dan Brandon Bilzerian

PLEASE TAKE NOTICE that the foregoing Special Motion to Dismiss will be heard on the 17 day of November, 2015 at 9:00 a.m., or as soon thereafter as counsel may be heard.

Dated this 12th day of October 2015.

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza
Marc J. Randazza, Esq.

Attorneys for Defendant
TMZ Productions, Inc.

RANDAZZA | LEGAL GROUP, PLLC

MEMORANDUM OF POINTS AND AUTHORITIES

1.0 INTRODUCTION

Strategic Lawsuits Against Public Participation ("SLAPP" suits) are an affront to the freedoms of expression and of the press. Plaintiffs file SLAPP suits against media outlets not because of any objective merit, but to punish defendants for exercising their free speech rights. Such suits have a chilling effect on others who might also be inclined to do so. Seeking to prevent such abuses, the Nevada legislature passed the nation's strongest Anti-SLAPP law, NRS 41.635 *et. seq*. The purpose of the law is to ensure that lawsuits are not brought lightly against defendants for exercising their First Amendment rights. Where such rights are at stake, a plaintiff must either meet the heavy burden imposed under the Anti-SLAPP act, or have judgment entered against him and pay the defendant's attorneys' fees. The current lawsuit against TMZ presents a paradigmatic example of the type of case that Nevada's Anti-SLAPP statute should foreclose.

Plaintiff Dan Bilzerian is a public figure, well known as a wealthy, flamboyant Internet celebrity and playboy. He even claims to be a candidate for president. As a controversial public figure, Bilzerian was the subject of a story that appeared on the website "The Dirty," a co-defendant in this action. Bilzerian objected to the story and filed the present lawsuit against "The Dirty." TMZ, as a member of the news media, subsequently published a story about Bilzerian's lawsuit. Bilzerian then amended his complaint to *also* sue TMZ for merely covering these proceedings.

There are few purer examples of an improper SLAPP suit than the present case. Under the "fair report" privilege, Bilzerian has no chance of prevailing on his defamation claim against TMZ, *which was merely reporting on a lawsuit that*

Bilzerian himself voluntarily filed. Nevada's Anti-SLAPP statute immunizes defendants from civil liability for engaging in "a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern." NRS 41.650. Such "good faith communications" include a "[c]ommunication made in direct connection with an issue of public interest in a place open to the public or in a public forum, which is truthful or is made without knowledge of its falsehood." NRS 41.637.

Bilzerian's suit is a blatant attempt to stifle speech related not only to a pending judicial proceeding, but also to an issue of significant public interest.[1] The Court should recognize Bilzerian's claim as a transparent attempt to chill speech. The Court should dismiss this suit against TMZ, and award TMZ its attorneys' fees and costs.

2.0 FACTUAL BACKGROUND

2.1 Bilzerian Acquires a National Reputation as a Millionaire Playboy and the "King of Instagram"

Dan Bilzerian is an Internet celebrity, known for his extravagant, jet-setting and partying lifestyle. He has a particularly strong social media presence on the website <instagram.com> ("Instagram"), boasting over 12 million followers. *See* **Exhibit 1**, Bilzerian Instagram profile.[2] He regularly shares photographs of himself posing with scantily-clad women, large sums of cash, expensive cars, planes, firearms, and extravagant homes. *See id*. He has been dubbed the "King of Instagram" and "Instagram's Playboy King." *See* **Exhibit 2**, Chris Ayres, *The truth about Dan Bilzerian*, GQ MAGAZINE (January 15, 2015), at 4;[3] *see also* **Exhibit 3**, Brogan Driscoll, *'King of Instagram' Dan Bilzerian Banned For Life From Nightclub*

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[1] Due to Bilzerian's status as a public figure.

[2] Available at: <https://instagram.com/danbilzerian/?hl=en> (last visited Oct. 9, 2015)

[3] Available at: <http://www.gq-magazine.co.uk/comment/articles/2015-01/26/the-truth-about-dan-bilzerian> (last visited Oct. 9, 2015)

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For Kicking A Woman In The Face, THE HUFFINGTON POST (August 12, 2014), at 1;[4] *and see* **Exhibit 4**, Lee Moran, *Instagram 'Playboy King' who suffered 3 heart failures rebrands as 'gentleman of poker,'* NEW YORK DAILY NEWS (Dec. 3, 2013), at 1.[5]

As the Huffington Post reported in May 2014, Bilzerian "is famous for being insanely rich and relentlessly promoting his playboy lifestyle to his near 2 million [now nearly 12 million] followers on Instagram." *See* **Exhibit 5**, Sara C Nelson, *Dan Bilzerian's Naked Girls, Guns & Goats: Inside The World of Instagram's Poker Billionaire (PICTURES)*, THE HUFFINGTON POST (May 14, 2014), at 1.[6] He describes himself as a "sexual philanthropist." *See* **Exhibit 6**, <danbilzerian.com> "Merch" page.[7] The press describes him as a "social media superstar with millions of Instagram followers." *See* **Exhibit 7**, Will Haskell, *'King of Instagram' Dan Bilzerian is running for president*, Business Insider (Jun. 10, 2015), at 1.[8]

In January 2015, GQ Magazine published a lengthy story on Bilzerian's stardom. *See* **Exhibit 2**. The son of a wealthy businessman convicted of fraud, Bilzerian first became famous as a charismatic player in the world of high-stakes poker. He was voted "funniest poker player" by *Bluff* magazine in 2010. *See id.* at 9, 18. He is also a self-proclaimed playboy, reportedly having slept with 16 different women during a 12-day trip to Cannes. *Id*. at 18. Given his history and lifestyle, GQ Magazine described him as a "a kind of Bruce Wayne-meets-Hugh Hefner for the social-media age," and "one of the biggest stars on the internet

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[4] Available at: <http://www.huffingtonpost.co.uk/2014/12/08/king-of-instagram-dan-bilzerian_n_6289252.html> (last visited Oct. 9, 2015)

[5] Available at: <http://www.nydailynews.com/news/national/poker-playing-bad-boy-suffered-3-heart-failures-article-1.1535828> (last visited Oct. 9, 2015)

[6] Available at: <http://www.huffingtonpost.co.uk/2014/05/14/dan-bilzerians-naked-girls-guns-goats-instagram-poker-billionaire-pictures_n_5323895.html> (last visited Oct. 9, 2015)

[7] Available at: <http://www.rowdygentleman.com/pages/dan-bilzerian-2016> (last visited Oct. 9, 2015)

[8] Available at: <http://www.businessinsider.com/king-of-instagram-dan-bilzerian-is-running-for-president-2015-6> (last visited Oct. 9, 2015)

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[sic]." *Id*. at 4. There is no question that Bilzerian has taken deliberate steps to cultivate his broad reputation as a wealthy, high-living, international playboy, surrounded by women. Indeed, he maintains his own website, devoted to publicizing details of his out-sized lifestyle. *See* **Exhibit 8**, <danbilzerian.com> homepage.

Bilzerian is no stranger to well-publicized legal disputes. In a widely reported incident, he threw a pornography actress off a roof, causing her to claim significant injuries. *See* **Exhibit 9**, Jay Hatahway, *Dan Bilzerian's Lawyer Responds to the Porn Star He Threw off the Roof*, GAWKER (May 15, 2014).[9] Bilzerian was later banned from a Miami nightclub for kicking a woman in the face, an incident that also received significant press coverage. *See* **Exhibit 2** at 9; *see also* **Exhibit 3**; *and see* **Exhibit 10**, Philip Caulfield, *'Instagram Playboy' Dan Bilzerian arrested at Los Angeles airport days after alleged model-kicking incident*, NEW YORK DAILY NEWS (Dec. 10, 2014), at 2-3.[10] Still later, he was arrested on bomb-making charges in Clark County, Nevada. *See* id. at 1.

In addition to covering his high-rolling lifestyle and his various legal travails, the media has also covered Bilzerian's medical history, reporting that by age 32 his extravagant lifestyle had led to him suffering three heart attacks and a pulmonary embolism. *See* **Exhibit 2** at 9-10; *see also* **Exhibit 4** at 3, 6. In short, Bilzerian's life is an open book – his legal travails and medical condition having all been the subject of press coverage long before this case transpired.

2.2 Bilzerian the Presidential Candidate

Capitalizing on his reputation and fame, in June 2015 Bilzerian announced his candidacy for President of the United States. Not surprisingly, the media

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[9] Available at: <http://gawker.com/dan-bilzerians-lawyer-responds-to-the-porn-star-he-thre-1576855124> (last visited Oct. 9, 2015)

[10] Available at: <http://www.nydailynews.com/entertainment/gossip/dan-bilzerian-arrested-los-angeles-airport-article-1.2040432> (last visited Oct. 9, 2015)

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extensively reported on him, yet again. *See, e.g.*, **Exhibit 11**, *Dan Bilzerian '16 Presidential Campaign Launch Party*, HUFFINGTON POST (Jun. 9, 2015);[11] *see also* **Exhibit 7**. Bilzerian hosted a raucous and well-attended presidential campaign kick-off party that, again, received widespread media coverage. *See* **Exhibit 12**, Molly Mulshine, *The notorious 'King of Instagram' threw a raunchy presidential campaign launch party and I had a front row seat*, BUSINESS INSIDER (Jun. 25, 2015). [12] Bilzerian's campaign materials describe him as a "Millionaire[,] Playboy[,] Poker Player[, and] Sexual Philanthropist," and "Bilzerian '16" merchandise is for sale on his website, further cementing his status as a public figure. *See* **Exhibit 6**.

2.3 Bilzerian Files Suit for a Statement Authored by Jane Doe I

On August 1, 2015, Jane Doe I authored and published an article on <thedirty.com>, alleging that she slept with Dan Bilzerian following his presidential kick-off party in New York and that he gave her chlamydia. *See* **Exhibit 13**, <thedirty.com> article.[13] On August 7, 2015, Bilzerian filed his initial Complaint, alleging a cause of action for defamation against co-Defendants TheDirty.com, Nik Richie, and Jane Doe I.[14]

Following the filing of Bilzerian's lawsuit, on August 10, 2015 TMZ published an article describing Bilzerian's lawsuit, the allegations he made in that lawsuit,

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[11] Available at: <http://www.huffingtonpost.com/party-earth/dan-bilzerian-16-presiden_b_7520504.html> (last visited Oct. 9, 2015)

[12] Available at: <http://www.businessinsider.com/inside-dan-bilzerians-campaign-kickoff-party-in-new-york-city-2015-6> (last visited Oct. 9, 2015)

[13] While Bilzerian did not identify the specific allegedly defamatory article in his Complaint or Amended Complaint, there is presumably no dispute that the article attached as **Exhibit 13** is the allegedly offending piece. *See* Amended Complaint at ¶23.

[14] Bilzerian's claims against The Dirty appear to be frivolous as well, in light of the immunity provided by 47 U.S.C. § 230. In fact, The Dirty prevailed on this very issue in *Jones v. Dirty World Entm't Recordings LLC*, 755 F.3d 398 (6th Cir. 2014) (reversing trial court decision when trial court failed to properly afford The Dirty immunity for statements authored by a third party in The Dirty's comments section).

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and the alleged defamatory article on <thedirty.com> upon which the lawsuit was based. *See* **Exhibit 14**, TMZ Article.[15] Following its publication of the article, Bilzerian added TMZ as a defendant.

For the purposes of TMZ's Anti-SLAPP motion, it is irrelevant whether the chlamydia story on <thedirty.com> is true or not – as TMZ's statements about **Bilzerian's lawsuit** (which challenged the truthfulness of the story) were indisputably true and privileged and could not possibly have been published with actual malice. TMZ is a news website that investigates and reports on issues relating to entertainment, sports, and business celebrities – i.e., people just like Bilzerian. TMZ's report on Bilzerian's defamation lawsuit was one such report.

3.0 LEGAL STANDARDS

Under Nevada's Anti-SLAPP statute, NRS 41.635 *et seq.*, if a lawsuit is brought against a defendant based upon the exercise of its First Amendment rights, the defendant may file a special motion to dismiss. Evaluating the Anti-SLAPP motion is a two-step process:

First, the defendant must show, by a preponderance of evidence, that the plaintiff's claim "is based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern." NRS 41.660(3)(a). One of the statutory categories of protected speech is "[c]ommunication[s] made in direct connection with an issue of public interest in a place open to the public or in a public forum, which is truthful or is made without knowledge of its falsehood." NRS 41.637(4). This category is construed broadly. *See Mindys Cosmetics, Inc. v. Dakar*, 611 F.3d 590, 597 (9th Cir. 2010).

[15] As with the article on <thedirty.com>, Bilzerian did not specifically identify the allegedly defamatory article published by TMZ, and so TMZ is forced to assume that the article attached as **Exhibit 14** is the allegedly offending piece.

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Second, if defendant meets its burden on the first prong, the burden then shifts to plaintiff, who must make a sufficient evidentiary showing that he has a probability of prevailing on his claim. NRS 41.660(3)(b).

A court should treat a special motion to dismiss under NRS 41.660 as a motion for summary judgment. *See Stubbs v. Strickland*, 297 P.3d 326, 329 (2013 Nev.) If the court grants the special motion to dismiss, the defendant is entitled to an award of reasonable costs and attorneys' fees, as well as an award of up to $10,000.00. NRS 41.670(1)(a)-(b).

Due to a relative lack of case law applying Nevada's Anti-SLAPP statute, Nevada courts have recognized that it is instructive to look to case law applying California's Anti-SLAPP statute, Cal. Code Civ. Proc. § 425.16, which shares many similarities with Nevada's law. *See John v. Douglas Cnty. Sch. Dist.*, 125 Nev. 746, 756 (2009) (stating that "we consider California caselaw because California's anti-SLAPP statute is similar in purpose and language to Nevada's anti-SLAPP statute"); *see also* **Exhibit 15**, S.B. 444, 2015 Leg., 78th Sess. (Nev. 2015) (defining the plaintiff's *prima facie* evidentiary burden in terms of California law.)[16]

4.0 ARGUMENT

4.1 Prong One: Bilzerian's Suit Arises from Speech Protected Under Nevada's Anti-SLAPP Statute

Bilzerian's sole cause of action is for defamation *per se*.[17] As is typical of a SLAPP suit, Bilzerian's complaint is vague as to precisely which statements are

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[16] The Nevada Legislature specifically provides for California Anti-SLAPP jurisprudence to serve as the basis for interpreting Nevada's Anti-SLAPP law:

> *When a plaintiff must demonstrate a probability of success of prevailing on a claim pursuant to NRS 41.660, the Legislature intends that in determining whether the plaintiff "has demonstrated with prima facie evidence a probability of prevailing on the claim" the plaintiff must meet the same burden of proof that a plaintiff has been required to meet pursuant to California's anti-Strategic Lawsuits Against Public Participation law as of the effective date of this act.*

Exhibit 15 at § 12.5(2).

[17] Bilzerian mistakenly labels his request for a preliminary and permanent injunction as a second claim for relief, but this is a prayer for relief rather than a cause of action.

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defamatory and why, but he does identify a statement regarding an allegation made by a poster on <thedirty.com> (that Bilzerian gave her a sexually transmitted disease) as allegedly false. He does not stop there, however, alleging that TMZ "compounded the defamation by publishing "specifics" regarding the defamatory statement, including "the specific disease . . . the Plaintiff had and transmitted," and by "providing commentary about the statements and the action." Amended Complaint at ¶23. The Amended Complaint, however, provides no details as to what "commentary" in the 149-word article is defamatory.

TMZ's article is a "[c]ommunication made in direct connection with an issue of public interest . . . in a public forum." NRS 41.637(4). There is no question that TMZ is a public forum; it is a widely known, publicly accessible website that publishes news related to celebrities. *See* **Exhibit 16**, <tmz.com> Home Page.[18] Such websites are public fora for Anti-SLAPP purposes. *See, e.g., Barrett v. Rosenthal*, 40 Cal. 4th 33, 41, n.4 (2006) (finding that [w]eb sites accessible to the public . . . are 'public forums' for purposes of the anti-SLAPP statute"); *see also Kronemyer v. Internet Movie Data Base, Inc.*, 150 Cal. App. 4th 941, 950 (2007) (same); *Huntington Life Sciences, Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.*, 129 Cal. Ap. 4th 1228, 1247 (2005) (same); *and see Damon v. Ocean Hills Journalism Club*, 85 Cal. App. 4th 468, 475 (2000) (defining public forum "as a place that is open to the public where information is freely exchanged".) News reporting, in particular, is entitled to protection under the Anti-SLAPP statute. *See Braun v. Chronicle Publ'g Co.*, 52 Cal. App. 4th 1036, 1045 (1997) (providing that "news reporting activity *is* 'free speech"') (emphasis original); *see also Gill v. Hearst Publ'g Co.*, 40 Cal. 2d 224, 229-30 (1953) (stating that "the constitutional

[18] Available at: <http://www.tmz.com> (last visited Oct. 9, 2015).

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guarantees of freedom of expression apply with equal force to [a] publication whether it be a newspaper or an entertainment feature".)

There is also no question that TMZ's article is in direct connection with an issue of public interest. The term "issue of public interest" is defined broadly as *any issue in which the public is interested*." *Nygard, Inc. v. Uusi-Kerttula*, 159 Cal. App. 4th 1027, 1042 (2008). "The issue need not be 'significant' to be protected by the anti-SLAPP statute – it is enough that it is one in which the public takes an interest." (*Id.*) An issue is one of "public interest" if concerns a person in the public eye or is a topic of widespread public interest. *See Rivero v. AFL-CIO*, 105 Cal. App. 4th 913, 924-27 (2003). Courts have regularly recognized that there is a public interest that generally "attaches to people who by their accomplishments, mode of living, professional standing or calling, create a legitimate and widespread attention to their activities." *Carlisle v. Fawcett Publ'ns, Inc.*, 201 Cal. App. 2d 733, 746 (1962); *see also Werner v. Times-Mirror Co.*, 193 Cal.App.2d 111, 117 (1961) (finding that "[a] person may, by his own activities or by the force of circumstances, become a public personage and thereby relinquish a part of his right of privacy to the extent that the public has a legitimate interest in his doings, affairs, or character"). A matter is of public interest particularly when it involves people in the realm of politics. *See Sipple v. Foundation for Nat. Progress*, 71 Cal. App. 4th 226 (1999) (holding that news article concerning nationally known political consultant was on an issue of public interest); *see also Rosenaur v. Scherer*, 88 Cal. App. 4th 260 (2001) (finding that actions arising from statements made during political campaigns implicate the Anti-SLAPP statute).

As discussed in more detail in Section 4.2.2.1, *infra*, Bilzerian is a public figure due to his Internet fame and extravagant lifestyle, as well his recently-

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announced presidential bid. Further, the TMZ article discusses a statement made by an individual who claims that during Bilzerian's **presidential kick-off party**, he infected her with a sexually transmitted disease. The article is thus in connection with an issue of public interest. It discusses a public figure and the consequences of his self-advertised sexually liberal habits. Further, it discusses the judgment and habits of a presidential candidate during a campaign event. In either case, the public has a genuine interest in Bilzerian, his lawsuit, the facts alleged therein, and the conduct that led to its filing.

4.2 Prong Two: Bilzerian Cannot Demonstrate a Probability of Prevailing on the Merits of His Defamation Claim

With TMZ having satisfied the first prong of Nevada's Anti-SLAPP statute, the burden now shifts to Bilzerian to make a showing by *prima facie* evidence that he has a probability of prevailing on the merits of his defamation claim against TMZ. *See* NRS 41.660(3)(b). He cannot satisfy this burden.

NRS 41.660 defines this burden as "the same burden of proof that a plaintiff has been required to meet pursuant to California's anti-Strategic Lawsuit Against Public Participation law as of the effective date of this act." **Exhibit 15** at § 12.5(2). Bilzerian cannot simply make vague accusations or provide a mere scintilla of evidence to defeat TMZ's motion. Rather, to satisfy his evidentiary burden under the second prong of the Anti-SLAPP statute, Bilzerian must present "substantial evidence that would support a judgment of relief made in the plaintiff's favor." *S. Sutter, LLC v. LJ Sutter Partners, L.P.*, 193 Cal. App. 4th 634, 670 (2011); *see also Mendoza v. Wichmann*, 194 Cal. App. 4th 1430, 1449 (2011) (holding that "substantial evidence" of lack of probable cause was required to withstand Anti-SLAPP motion on malicious prosecution claim.)

A plaintiff must meet this burden as to all elements of his claim, and at the Anti-SLAPP stage Bilzerian must make "a sufficient prima facie showing of facts

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to sustain [his] burden of demonstrating a **high probability** that [TMZ] published defamatory statements with knowledge of their falsity or while entertaining serious doubts as to their truth." *Burrill v. Nair*, 217 Cal. App. 4th 357, 390 (2013) (emphasis added).

To establish a cause of action for defamation, a plaintiff must allege: (1) a false and defamatory statement by the defendant concerning the plaintiff; (2) an unprivileged publication to a third person;[19] (3) fault, amounting to at least negligence; and (4) actual or presumed damages. *See Wynn v. Smith*, 117 Nev. 6, 10 (Nev. 2001); *see also Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 718 (2002). A statement is only defamatory if it contains a factual assertion that can be proven false. *See Pope v. Motel* 6, 114 P.3d 277, 282 (Nev. 2005).

As to TMZ, the issue is *not* whether Bilzerian can disprove that he infected someone with a sexually transmitted disease – this is legally irrelevant. Rather, the issue is whether Bilzerain has a probability of prevailing on the question of whether TMZ's article is privileged as a fair report of Bilzerian's defamation lawsuit. He clearly does not. Indeed, there is nothing untruthful in TMZ's article and even the most cursory reading reveals this fact. The article accurately reports that Bilzerian filed a defamation lawsuit against TheDirty.com, and further accurately identifies the story on TheDirty.com website that Bilzerian sued over. TMZ never stated that it adopted any alleged defamatory statements appearing on TheDirty.com. To the contrary, TMZ simply made an accurate news report that Bilzerian claimed that the statements defamed him.

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[19] The Court should note that, despite alleging that TMZ knew the statements in question were false, Bilzerian does not assert that its publication of the article was *unprivileged*. This alone warrants dismissal. *See Pope v. Motel* 6, 114 P.3d 277, 282 (2005).

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4.2.1 TMZ's news article is privileged as a fair report

Nevada recognizes the fair reporting privilege, which is "a special privilege of absolute immunity from defamation" available to media reporting on judicial proceedings. *See Sahara Gaming Corp. v. Culinary Workers Union Local 226*, 115 Nev. 212, (Nev. 1999). This privilege is absolute and "precludes liability even where the defamatory statements are published with knowledge of their falsity and personal ill will toward the plaintiff." *Circus Circus Hotels, Inc. v. Witherspoon*, 657 P.2d 101, 105 (Nev. 1983). To enjoy this privilege, a defendant need only make a "fair, accurate, and impartial report of events occurring in judicial proceedings." *Id*. It extends to "any person who makes a republication of a judicial proceedings from material available to the general public." *Dorsey v. Nat'l Enquirer*, 973 F.2d 1431, 1434-37 (9th Cir. 1992); *see also Wynn v. Smith*, 117 Nev. at 14. The Nevada Supreme Court has held that the scope of this privilege is "quite broad," and that it should be applied "liberally, resolving any doubt in favor of its relevance or pertinency." *Fink v. Oshins*, 49 P.3d 640, 643 (Nev. 2002). This privilege is recognized "on the theory that members of the public have a manifest interest in observing and being made aware of public proceedings and actions." *Wynn v. Smith*, 117 Nev. at 14.

The facts as alleged by Bilzerian in his Amended Complaint establish that TMZ's publication of its article is protected as a fair report of judicial proceedings, namely its lawsuit against co-Defendants Dirty World, LLC and Nik Richie. Bilzerian, however, apparently takes issue with TMZ's (i) quotation of the "specific" alleged defamatory statement in the thedirty.com article ("I ended up getting super drunk and sleeping with Dan. I got tested two weeks later and lucky me I found out he gave me Chlamydia"); and (ii) "commentary" that summarizes the action ("he's suing a website for claiming he's riddled with an STD;" "Bilzerian filed a defamation suit against TheDirty.com and its founder, Nik

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Richie, claiming its story that he gave a sex partner chlamydia is false and damaging;" and "Bilzerian says this one's different, because the site posted pics of him with several women next to the comment"). **Exhibit 14**. But as is apparent on their face, these are all statements that fairly summarize the allegations in Bilzerian's Complaint and the underlying facts relating thereto.

Bilzerian's argument appears to be that, by going into more detail about the alleged defamatory statement than he set forth in his Complaint, TMZ's reporting on Bilzerian's suit was not a fair report. But a defendant is not restricted to verbatim quotations of an allegation to enjoy this privilege; it need only make a "fair, accurate" report. *Witherspoon*, 657 P.2d at 105. Upon reviewing Bilzerian's Complaint and noting that it only characterized, rather than quoted, the allegedly defamatory statement, TMZ did what any responsible media outlet would do by visiting the publicly available and allegedly defamatory website, and then referencing the alleged defamatory statement in its story. Bilzerian cannot identify a single statement that is a mischaracterization of his suit against Richie and TheDirty.com, and he cannot base liability on the insufficiencies of his own pleadings. As such, TMZ's publication of its article is protected by Nevada's fair report privilege, and Bilzerian's defamation claim has no probability of success.

4.2.2 Even if TMZ were not protected by the fair report privilege, Bilzerian could not show actual malice

A public figure plaintiff cannot recover unless he proves by clear and convincing evidence that the defendant published the defamatory statement with actual malice, i.e., with 'knowledge that it was false or with reckless disregard of whether it was false or not.' Mere negligence does not suffice. The plaintiff must prove that the author 'in fact entertained serious doubts as to the truth of his publication,' or acted with a 'high degree of awareness of . . .

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probable falsity.'" *Masson v. New Yorker Magazine*, 501 U.S. 496, 510 (1991); *St. Amant v. Thompson*, 390 U.S. 727, 731 (1968).

"Our profound national commitment to the free exchange of ideas, as enshrined in the First Amendment, demands that the law of libel carve out an area of 'breathing space' so that protected speech is not discouraged." *Harte-Hanks Communications v. Connaughton*, 491 U.S. 657, 686 (1989); *see also Gertz v. Welch*, 418 U.S. 323, 342 (1974) (quoting *NAACP v. Button*, 371 U.S. 415, 433 (1963)); *and see New York Times Co. v. Sullivan*, 376 U.S. 254, 272 (1964). Failing to hold public figures to a high standard in defamation actions risks removing the oxygen from this breathing space. For that reason, a public figure must prove "actual malice" with convincing clarity. *New York Times Co.*, 376 U.S. at 279-280.

Even assuming, *arguendo*, that TMZ falsely stated that Bilzerian had, and transmitted, chlamydia (as opposed to accurately reporting that Bilzerian had filed a lawsuit asserting that someone had made such statements), to prevail on his defamation claim, Bilzerian would also need to demonstrate that TMZ made those statements with actual malice.

4.2.2.1 Bilzerian is a public figure

The degree of fault required by a defendant for defamation liability to attach depends upon the target and content of the defendant's speech. For defamation purposes, there are three categories of plaintiffs: the general public figure, the limited purpose public figure, and the private individual. A general public figure is someone who is "intimately involved in the resolution of important public questions or, by reason of their fame, shape events in areas of concern to society at large." *Hustler Magazine v. Falwell*, 485 U.S. 46, 51 (1988) (citing *Curtis Publishing Co. v. Butts*, 388 U.S. 130, 164 (1967) (Warren, C.J., concurring in result)). A limited purpose public figure "voluntarily injects himself or is drawn into

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a particular public controversy and thereby becomes a public figure for a limited range of issues." *Gertz* 418 U.S. at 351; *see also Pegasus*, 118 Nev. at 720. This is a question of law, and a court's determination is based "on whether the person's role in a matter of public concern is voluntary and prominent." *Bongiovi v. Sullivan*, 122 Nev. 556, 572 (2006); *see also Harte Hanks Comm'n, v. Connaughton*, 491 U.S. 657, 685 (1989).

As demonstrated in Section 2, *supra*, Bilzerian is a general public figure, or at the very least a limited-purpose public figure in the context of his extravagant and widely reported-on lifestyle. He has over 12 million followers on Instagram and is commonly referred to as the "King of Instagram." *See* **Exhibits 1-4**. He receives extensive coverage in several media outlets regarding the minutiae of his extravagant "playboy" lifestyle. *See* **Exhibits 2, 4-5**. He has announced his intent to run for the office of President of the United States, kicked off by a well-attended party. *See* **Exhibits 6-7, 11-12**. Even his legal escapades have garnered significant media attention. *See* **Exhibits 2-3, 8-9**. He has actively cultivated this reputation through his own actions. Bilzerian cannot credibly claim that he is not a public figure in regards to a lawsuit he filed against someone who claimed that, during his presidential campaign kick-off party, he infected her with chlamydia.

As a public figure, Bilzerian must prove all elements of "actual malice" clearly and convincingly. *New York Times Co.*, 376 U.S. at 279-280. He must show that any allegedly false statements were made with a "high degree of awareness of their probable falsity," *Garrison v. Louisiana*, 379 U.S. 64, 74 (1964); *see also Bose Corp. v. Consumers Union, Inc.*, 466 U.S. at 511. Otherwise, even under this hypothetical set of facts, the Anti-SLAPP motion would have to be granted. *See Makaeff v. Trump Univ., LLC*, 26 F. Supp. 3d 1002, 1014 (S.D. Cal.

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2014) (granting Anti-SLAPP motion based on lack of clear evidence of actual malice).

4.2.2.2 Bilzerian cannot show actual malice

Because he is a public figure, even assuming that TMZ made the allegedly defamatory statements, Bilzerian would be required to show that TMZ published the article containing those statements with "actual malice."

To establish actual malice, a plaintiff must prove that the defendant made the statement "with knowledge that it was false or with reckless disregard of whether it was true or not." *New York Times* Co., 376 U.S. at 279. "Reckless disregard" is also a term of art. To establish reckless disregard, a public official or public figure must prove that the publisher "entertained serious doubts as to the truth of his publication." *St. Amant* v. *Thompson*, 390 U.S. 727, 731 (1968).

Reckless disregard only exits when the defendant "acted with a 'high degree of awareness of . . . [the] probable falsity' of the statement or had serious doubts as to the publication's truth." *Pegasus*, 118 Nev. at 719. A plaintiff must demonstrate that the defendant speaker either knew his statement was false or subjectively entertained serious doubt that his statement was truthful. *See Bose Corp.*, 466 U.S. at 511 n.30. The question is not "whether a reasonably prudent man would have published, or would have investigated before publishing. There must be sufficient evidence to permit the conclusion that the defendant in fact entertained serious doubts as to the truth of his publication." *Reader's Digest Assn. v. Superior Court*, 690 P.2d 610, 617-18 (Cal. 1984). Moreover, "[a] publisher does not have to investigate personally, but may rely on the investigation and conclusions of reputable sources." *Id.* at 619.

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Finally, a defamation plaintiff must establish actual malice by **clear and convincing evidence**.[20] *See Bose Corp. v. Consumers Union, Inc.*, 466 U.S. at 511. This is a requirement that presents "a heavy burden, far in excess of the preponderance sufficient for most civil litigation." *Hoffman v. Capital Cities/ABC, Inc.*, 255 F.3d 1180, 1186-87 (9th Cir. 2001) (internal quotation marks omitted). "The burden of proof by clear and convincing evidence requires a finding of high probability. The evidence must be so clear as to leave no substantial doubt. It must be sufficiently strong to command the unhesitating assent of every reasonable mind." *Copp v. Paxton*, 52 Cal. Rptr. 2d 831, 846 (Cal. Ct. App. 1996) (internal quotation marks omitted). The same standards apply for a limited-purpose public figure when the statement concerns the public controversy or range of issues for which he is known. *See Makaeff v. Trump Univ., LLC*, 715 F.3d 254 (9th Cir. 2013).

Bilzerian has no hope of making this showing. Even assuming, *arguendo*, that TMZ adopted the statements in question as true, as opposed to merely reporting that others made them and Bilzerian filed suit in response, Bilzerian's own carefully cultivated reputation as a "sexual philanthropist" with scores of sexual partners who regularly posts pictures of himself surround by a wide array of scantily clad women, would clearly have been sufficient for TMZ, or any other news organization, to give at least some credit to the allegations. It would not strain credulity for TMZ, or any other reasonable commentator, to accept that during the course of having intimate relations with a large number of sexual partners, Bilzerian may have contracted and thereafter passed on a sexually transmitted disease. Of course, this is irrelevant to TMZ, as TMZ's statements were

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[20] This is not to say that Bilzerian must definitively prove actual malice by clear and convincing evidence at this stage, but rather that he must provide *prima facie* evidence that he will later be able to meet this extremely high evidentiary burden.

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privileged as a fair report of legal proceedings. But, even in the absence of that privilege, TMZ would have had an absolute right to print what it printed.

In sum, even in the absence of the fair reporting privilege, Bilzerian would be unable to bring forward any argument or evidence to make out a prima facie showing of actual malice on the part of TMZ, much less a showing that he would probably prevail.

5.0 CONCLUSION

Bilzerian brought this lawsuit against TMZ to stifle media coverage on an ongoing lawsuit concerning an issue of public interest. He is the paradigmatic SLAPP plaintiff. The Court should dismiss this suit against TMZ before it incurs any more time or expense related to this litigation, and should award TMZ its reasonable attorneys' fees in connection with preparing this motion, its reply brief, and the expense of oral argument.

Dated: 12th of October, 2015

Respectfully Submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

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TMZ Productions, Inc.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 12, 2015, I served a true and correct copy of the foregoing document via electronic mail and U.S. Mail to:

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Respectfully Submitted,

Employee,
Randazza Legal Group, PLLC

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DISTRICT COURT

CLARK COUNTY, NEVADA

DAN BRANDON BILZERIAN, an individual Plaintiff, vs. DIRTY WORLD, LLC, a Delaware limited liability company, d/b/a THEDIRTY.COM; HOOMAN KARAMIAN, an individual, d/b/a Nik Richie; TMZ PRODUCTIONS, INC., a California Corporation; DOES I-X, inclusive; and ROE BUSINESS ENTITIES I-X, inclusive, Defendants.	Case No. A-15-722801-C Dept. No.: XXXII **DECLARATION OF TREY A. ROTHELL**

I, TREY A. ROTHELL, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I am employed as a paralegal for Randazza Legal Group, PLLC. I have firsthand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.
2. On October 9, 2015, at approximately 11:45 a.m Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the Instagram

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profile of the user "danbilzerian" located at the url: <https://instagram.com/danbilzerian/?hl=en>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 1** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

3. On October 9, 2015, at approximately 11:48 a.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "The Truth About Dan Bilzerian," located at the url: <http://www.gq-magazine.co.uk/comment/articles/2015-01/26/the-truth-about-dan-bilzerian>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 2** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

4. On October 9, 2015, at approximately 11:50 a.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "'King of Instagram' Dan Bilzerian Banned For Life From Nightclub For Kicking A Woman In The Face," located at the url: <http://www.huffingtonpost.co.uk/2014/12/08/king-of-instagram-dan-

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bilzerian_n_6289252.html>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 3** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

5. On October 9, 2015, at approximately 11:51 a.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "Instagram 'Playboy King' who suffered 3 heart failures rebrands as 'gentleman of poker,'" located at the url: <http://www.nydailynews.com/news/national/poker-playing-bad-boy-suffered-3-heart-failures-article-1.1535828>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 4** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

6. On October 9, 2015, at approximately 11:52 a.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "Dan Bilzerian's Naked Girls, Guns & Goats: Inside The World of Instagram's Poker Billionaire (PICTURES)," located at the url: <http://www.huffingtonpost.co.uk/2014/05/14/dan-bilzerians-naked-girls-

guns-goats-instagram-poker-billionaire-pictures_n_5323895.html>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 5** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

7. On October 9, 2015, at approximately 11:53 a.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I navigated to the website <danbilzerian.com>. By clicking on the "Merch" hyperlink displayed prominently on this webpage, I was brought to the url <http://www.rowdygentleman.com/pages/dan-bilzerian-2016>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 6** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

8. On October 9, 2015, at approximately 12:00 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "'King of Instagram' Dan Bilzerian is running for president," located at the url: <http://www.businessinsider.com/king-of-instagram-dan-

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bilzerian-is-running-for-president-2015-6>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 7** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

9. On October 9, 2015, at approximately 12:09 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the webpage located at the url: <danbilzerian.com>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 8** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

10. On October 9, 2015, at approximately 12:01 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "Dan Bilzerian's Lawyer Responds to the Porn Star He Threw off the Roof," located at the url: <http://gawker.com/dan-bilzerians-lawyer-responds-to-the-porn-star-he-thre-1576855124>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 9** to the Anti-SLAPP

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Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

11. On October 9, 2015, at approximately 12:02 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "'Instagram Playboy' Dan Bilzerian arrested at Los Angeles airport days after alleged model-kicking incident," located at the url: <http://www.nydailynews.com/entertainment/gossip/dan-bilzerian-arrested-los-angeles-airport-article-1.2040432>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 10** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

12. On October 9, 2015, at approximately 12:18 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "Dan Bilzerian '16 Presidential Campaign Launch Party," located at the url: <http://www.huffingtonpost.com/party-earth/dan-bilzerian-16-presiden_b_7520504.html>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 11** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this

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printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

13. On October 9, 2015, at approximately 12:18 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "The notorious 'King of Instagram' threw a raunchy presidential campaign launch party and I had a front row seat," located at the url: <http://www.businessinsider.com/inside-dan-bilzerians-campaign-kickoff-party-in-new-york-city-2015-6>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 12** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

14. On October 9, 2015, at approximately 12:19 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "UPDATE: DAN BILZERIAN GAVE ME CHLAMYDIA," located at the url: <http://thedirty.com/gossip/celebrities/fakeequis/dan-bilzerian-gave-me-chlamydia/>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 13** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The

text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

15. On October 9, 2015, at approximately 12:20 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online article "Dan Bilzerian Sues Website ... I Don't Have Any STDs!!!" located at the url: <http://www.tmz.com/2015/08/10/dan-bilzerian-lawsuit-defamation-thedirty-nik-richie/>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 14** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

16. On October 9, 2015, at approximately 12:23 p.m. Pacific time, at the Las Vegas office of Randazza Legal Group, PLLC, 3625 S. Town Center Drive, Suite 150, Las Vegas, Nevada 89135, I personally observed the online homepage of TMZ located at the url: <http://www.tmz.com>. Immediately after observing this website, I created a printout of the website in PDF format using a MacBook Air laptop and saved it to both the laptop's hard drive and Randazza Legal Group, PLLC's server. **Exhibit 16** to the Anti-SLAPP Special Motion to Dismiss Under NRS 41.660 filed herewith is a true and correct copy of this printout. The text of the website remains identical to how it appeared on the Internet as of the date I created the printout.

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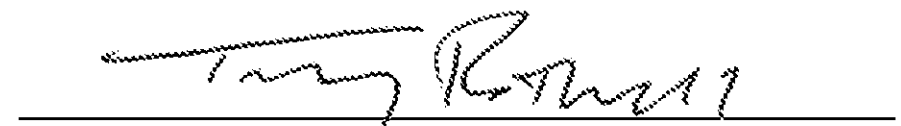
I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Executed this 9th day of October, 2015 in Las Vegas, Nevada.



Trey A. Rothell

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EXHIBIT 1

Dan Bilzerian

Instagram profile

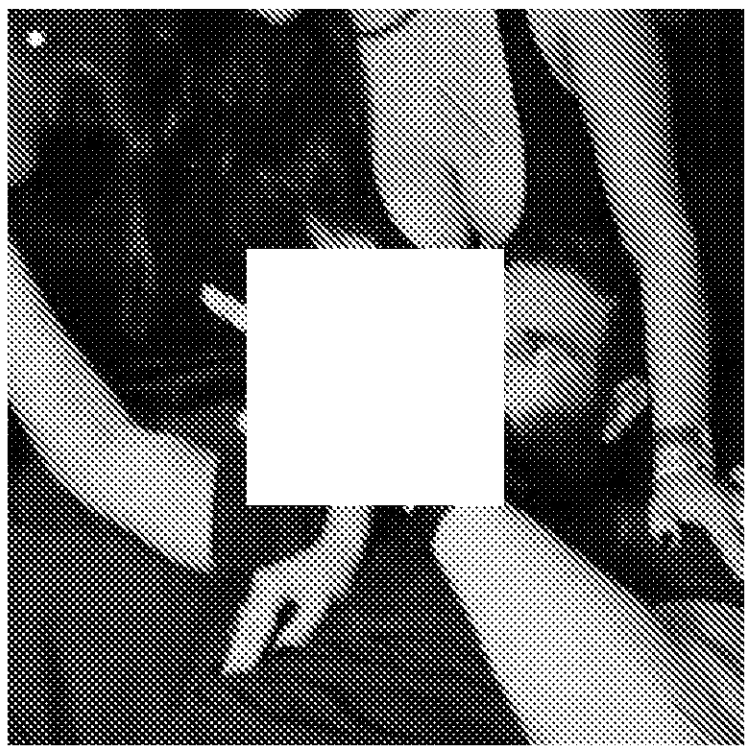
Search

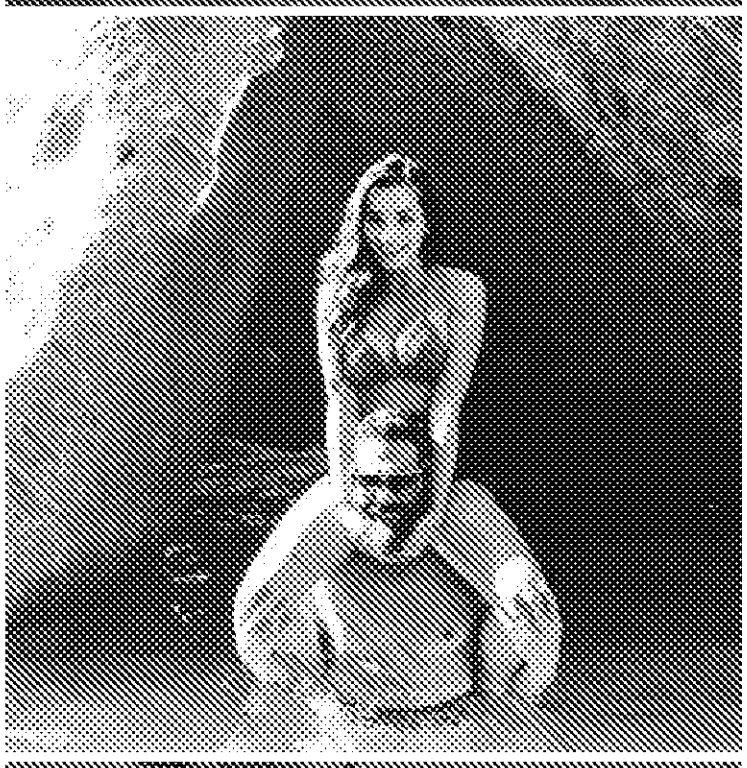
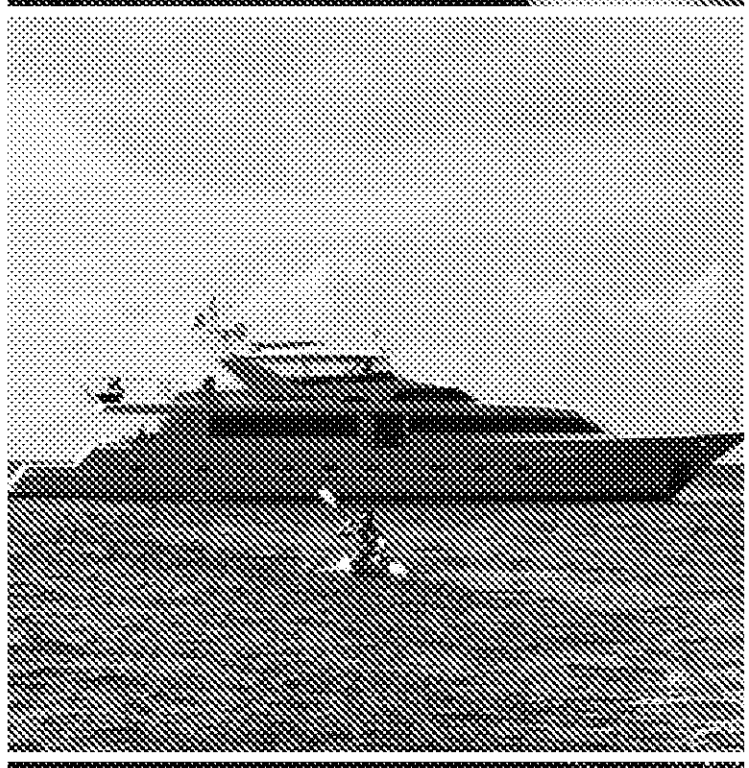
treyrothell

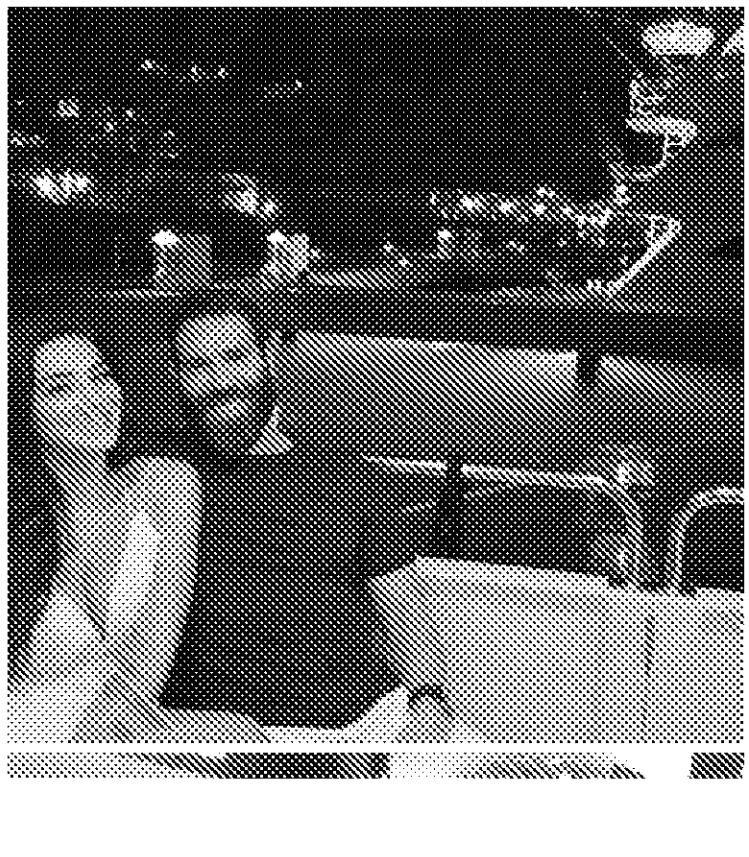
danbilzerian FOLLOW

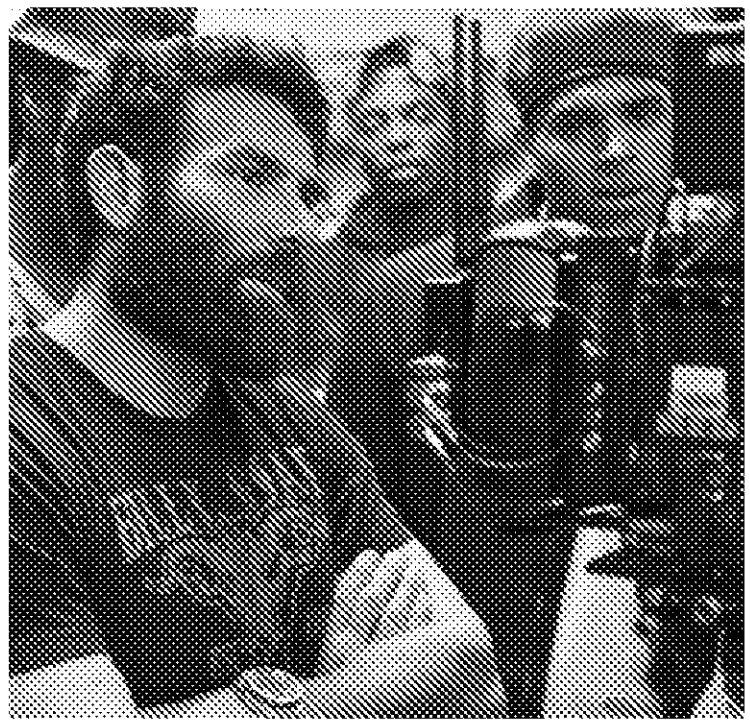
Dan Bilzerian Biz: Contact Mo at ICM

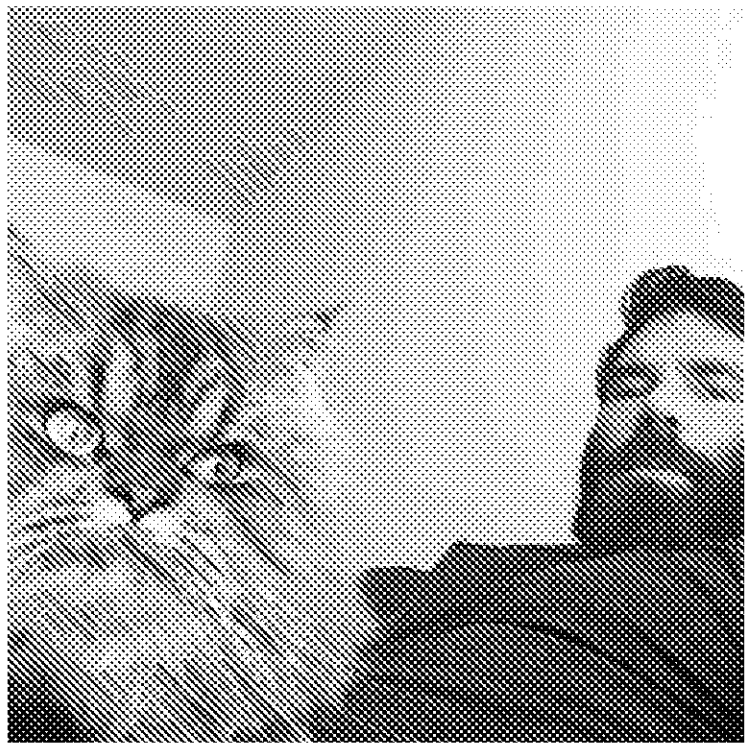
909 posts **12.9m** followers **100** following

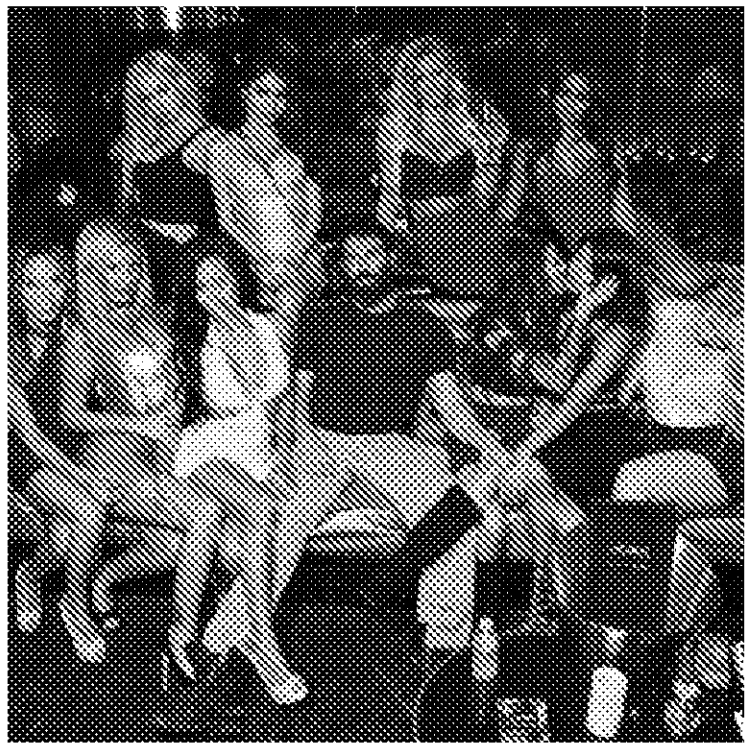


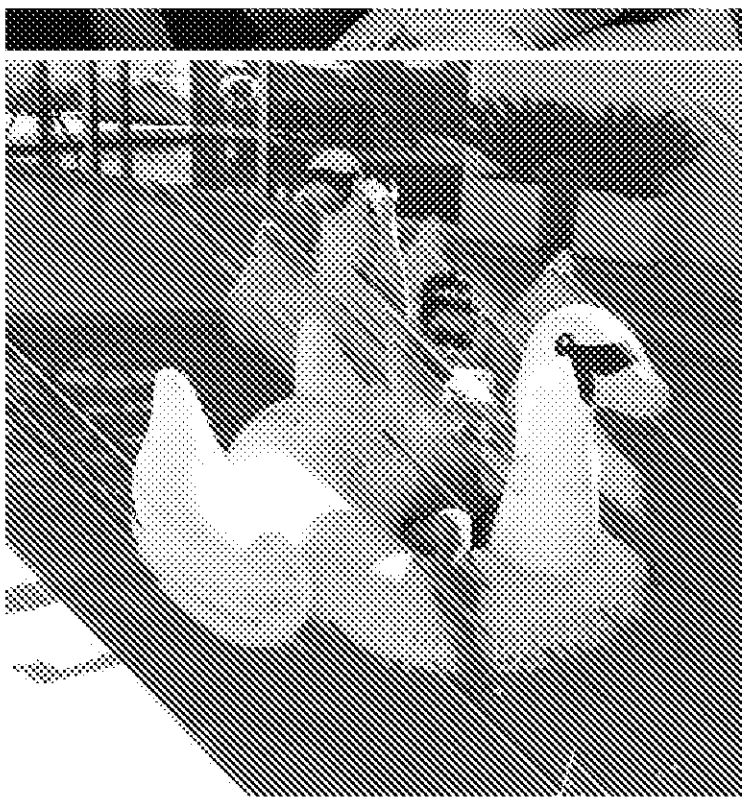



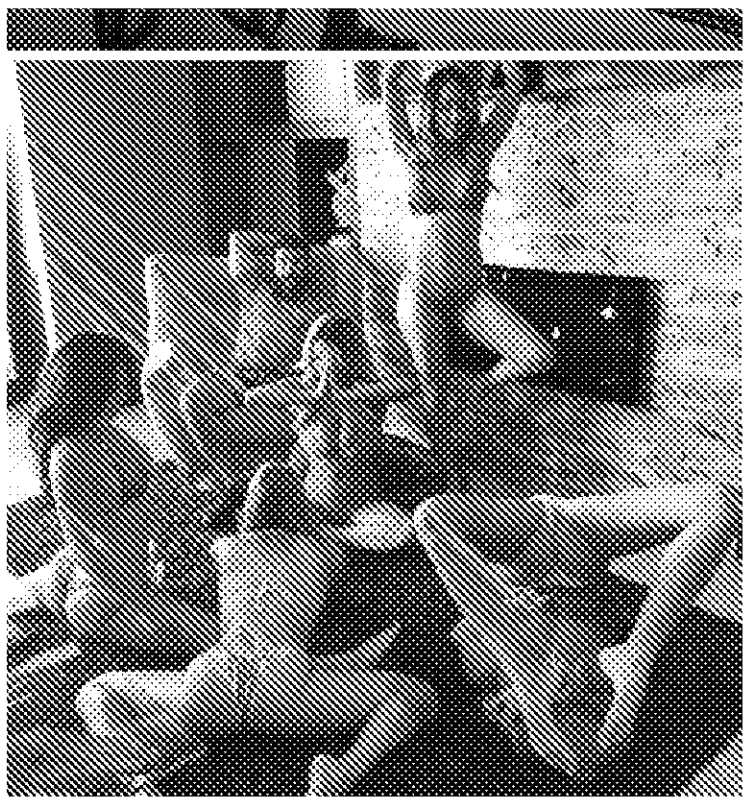
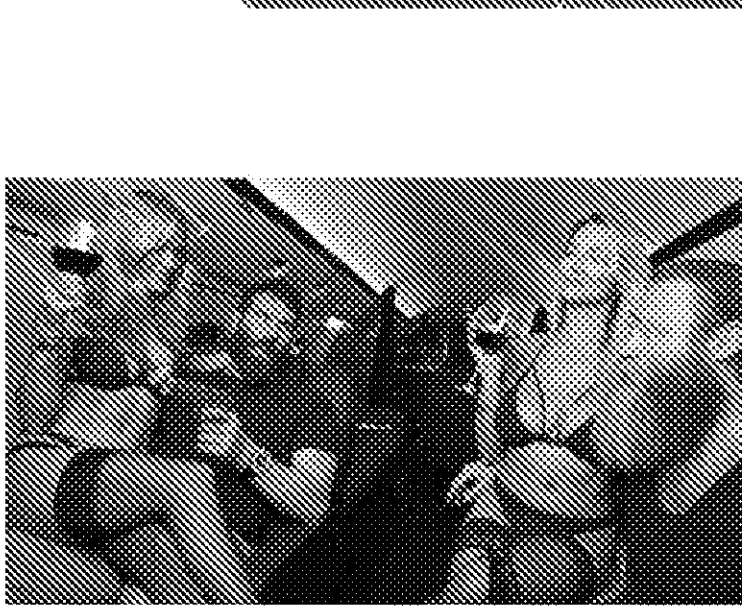
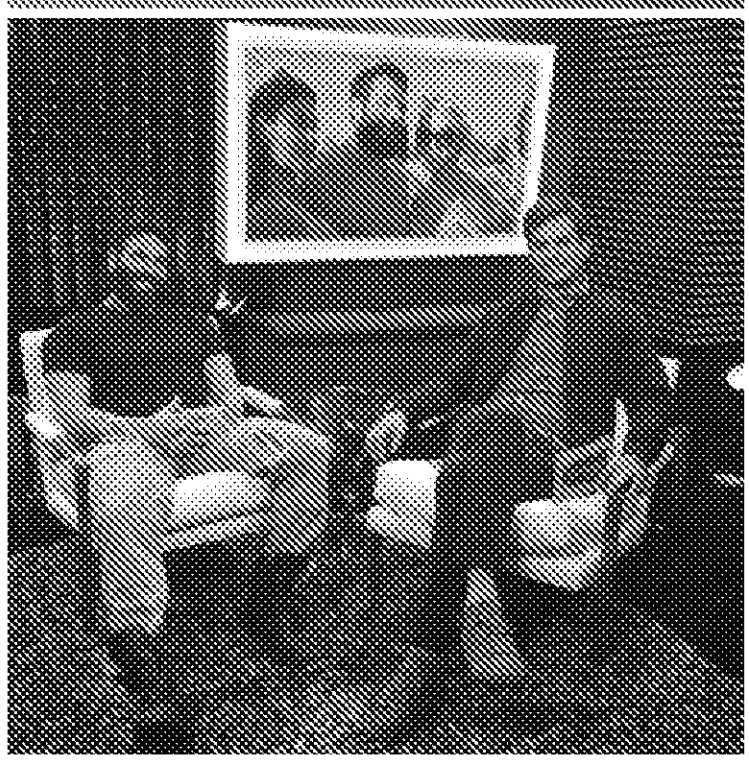


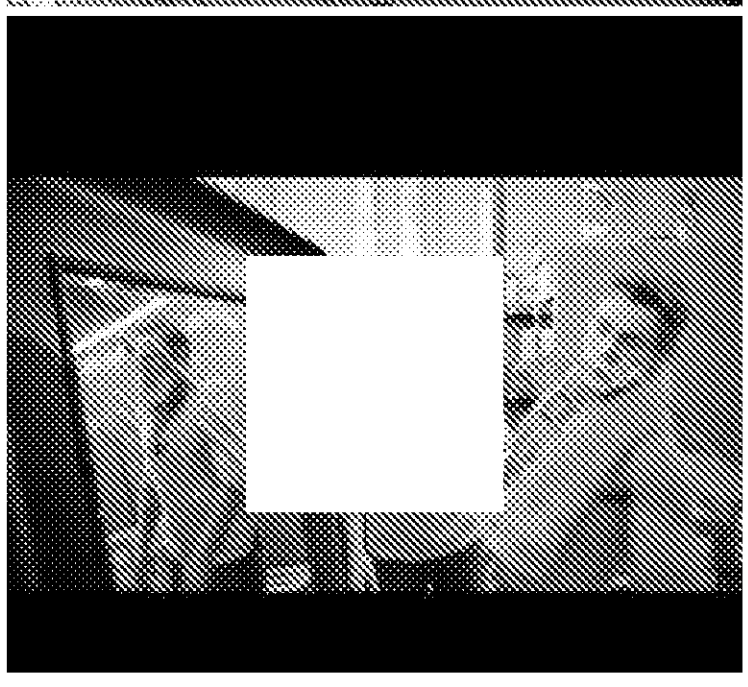


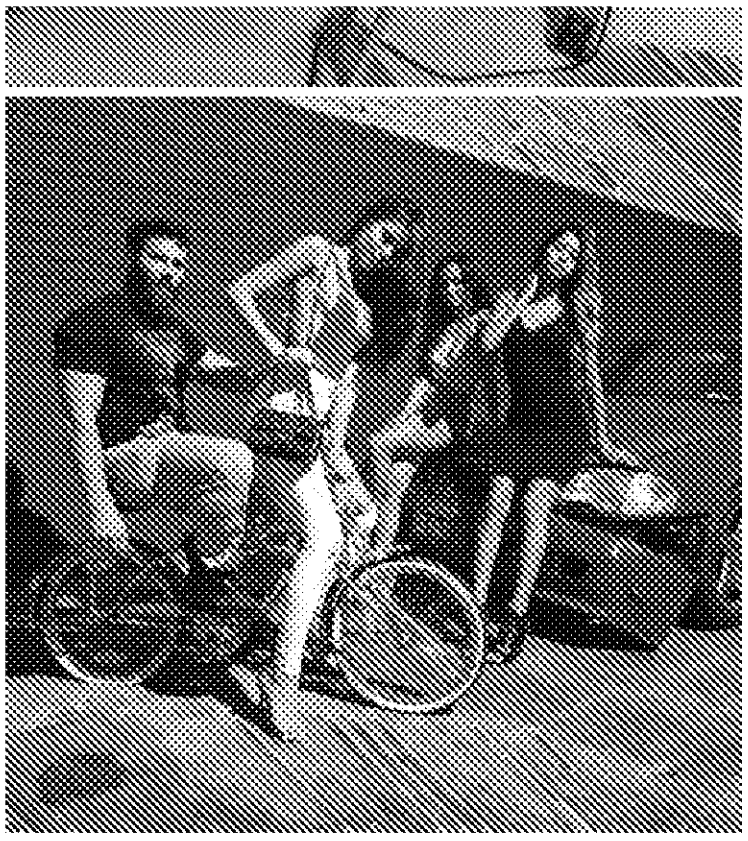


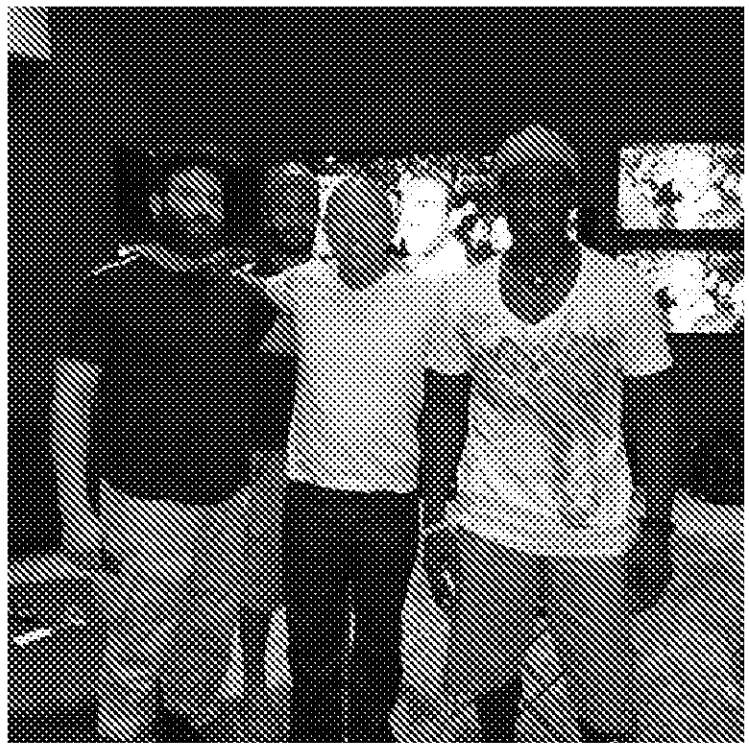










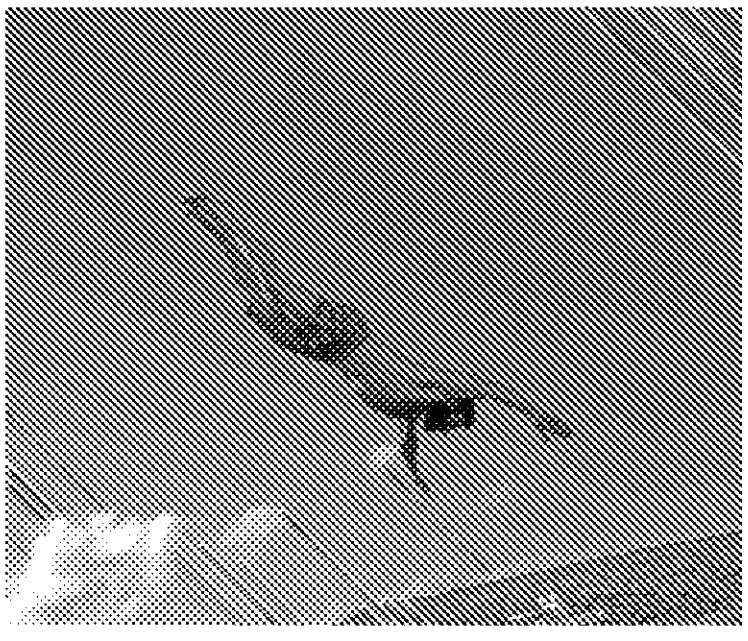
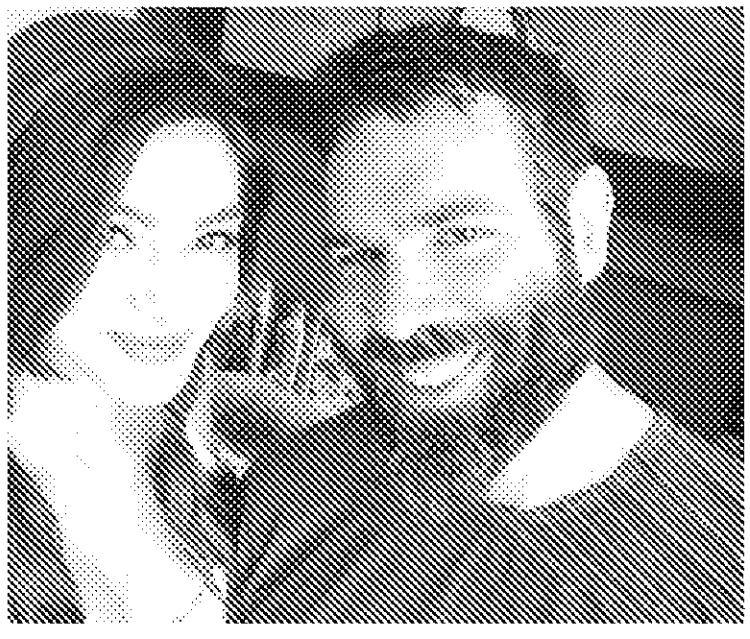
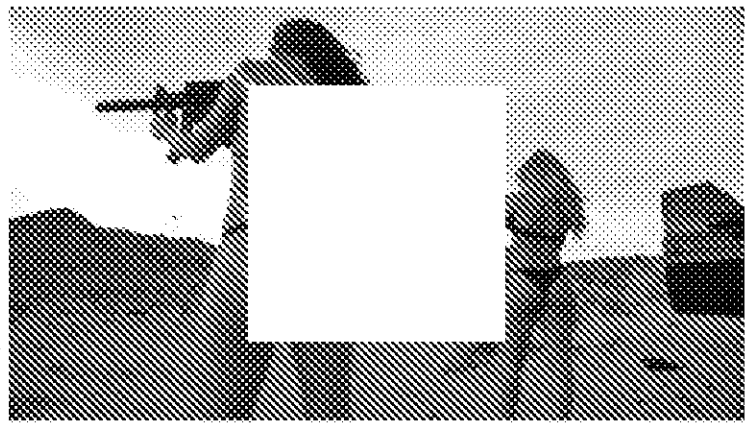




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EXHIBIT 2

Chris Ayres,
The truth about Dan Bilzerian,
GQ MAGAZINE (January 15, 2015)

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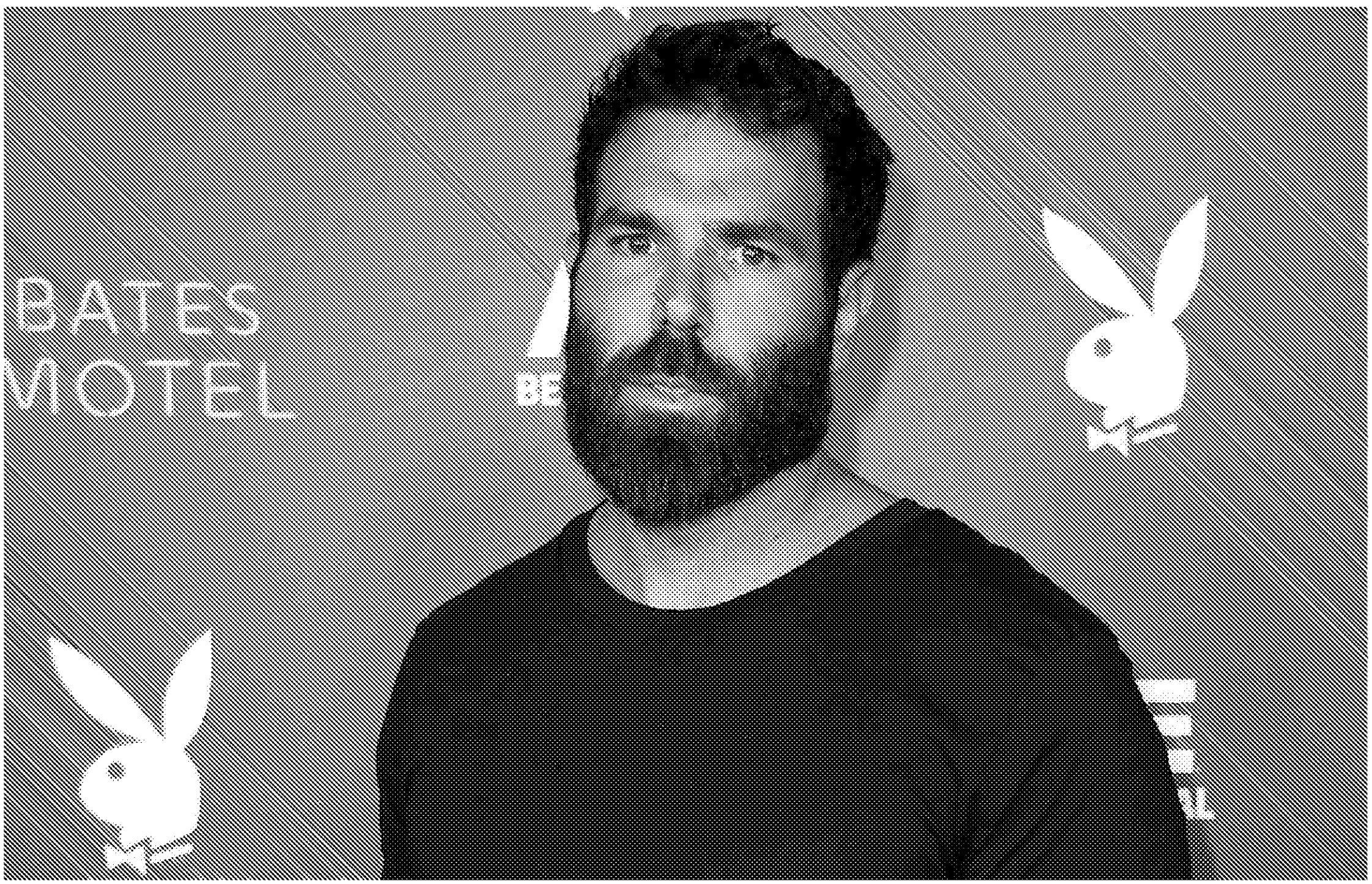

COMMENT / CULTURE

The truth about Dan Bilzerian

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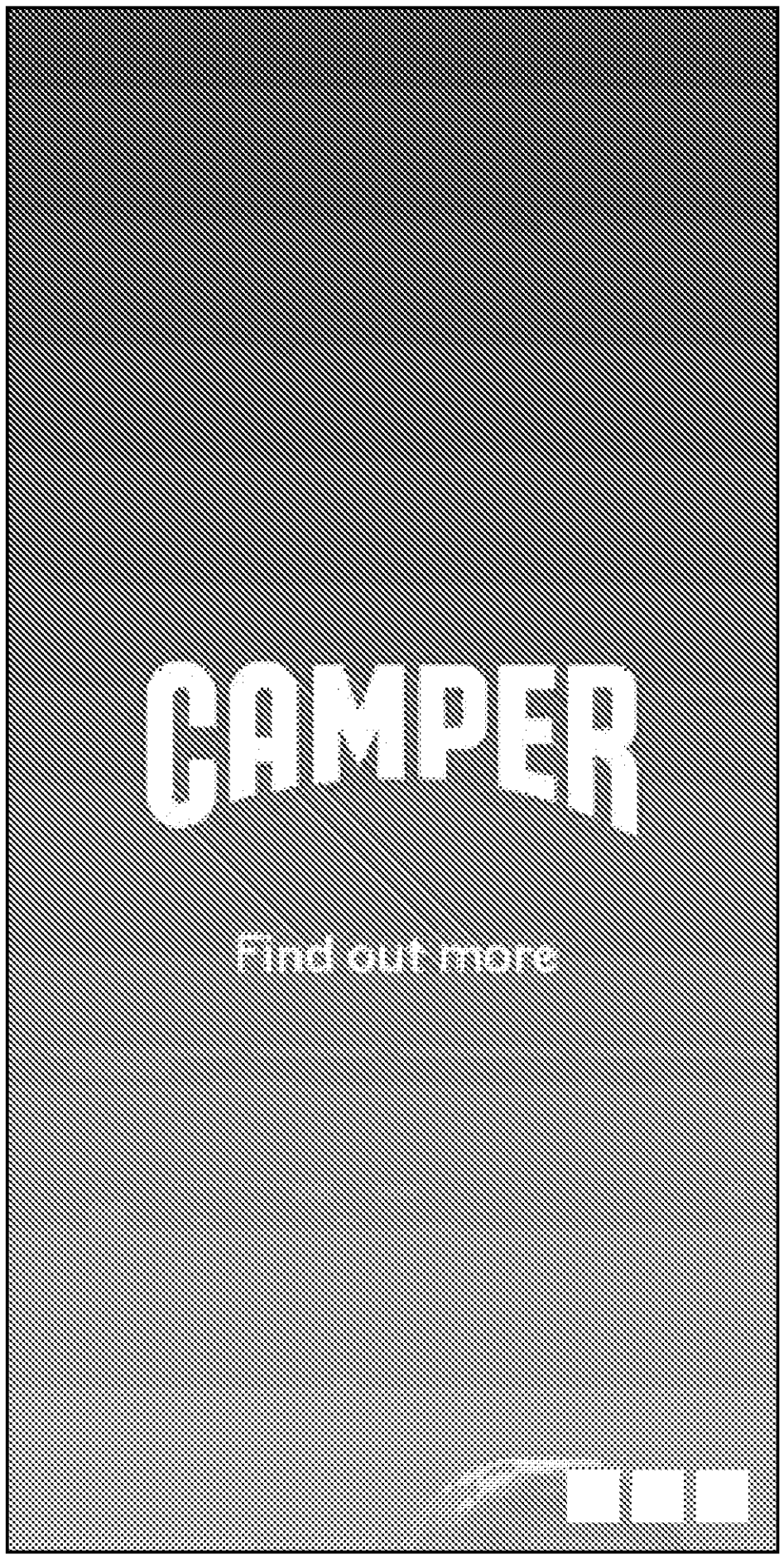
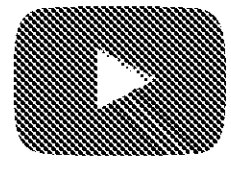
BY CHRIS AYRES 27 JANUARY 15

Five seconds of looped video were all it took to make Dan Bilzerian an icon.



The clip, lifted from the live TV coverage of the 2013 World Series of Poker in Las Vegas, shows a player sitting at a felt table, betting on a hand, with $7 million in the pot. Or at least that's what you *think* it shows the first time you watch it. But then the clip repeats, and repeats... until, finally, you notice the intensely staring, Tom Cruise-ish figure in the top-left corner of the screen. He's sitting in the spectators' gallery, bathed in blue mood-lighting, watching the game. More to the point, there's a young woman draped over him – black dress, long hair, adoring eyes – who appears to be employed for the sole task of, well... *stroking his beard.*

WSOP 2013 - Main Event Final Table Part 7 World Series of Pok...



The beard stroking moment is at 1:43:39

Thus the internet - and the world - was introduced to the strange and unsettling phenomenon of Dan "Blitz" Bilzerian , the 34-year-old son of an exiled Eighties corporate raider, and a kind of Bruce Wayne-meets-Hugh Hefner for the social-media age.

Before the beard-stroking video went viral, few had heard of Bilzerian outside the sweaty male sub-culture of high-stakes poker or the core group of fans who kept track of him online.

One year later, however, and Bilzerian - a 5ft, 9 and a half inches tall , barrel-chested former US Navy Seal trainee and self-described "venture capitalist" who splits his time between Los Angeles and Vegas - is one of the biggest stars on the internet, and a man through whom millions now vicariously live out their fantasies in real time.

Crowned the King of Instagram by his followers (he has over 6 million of them, and adds another 20,000 or so a day) his feed documents a lifestyle so outrageous and seemingly free of moral, financial or legal constraints, it's as though he inhabits a Jason Statham movie, or a Hunter S Thompson novel -

only with faster cars, less inhibited females, and more advanced weaponry.

danbilzerian • 11 months ago

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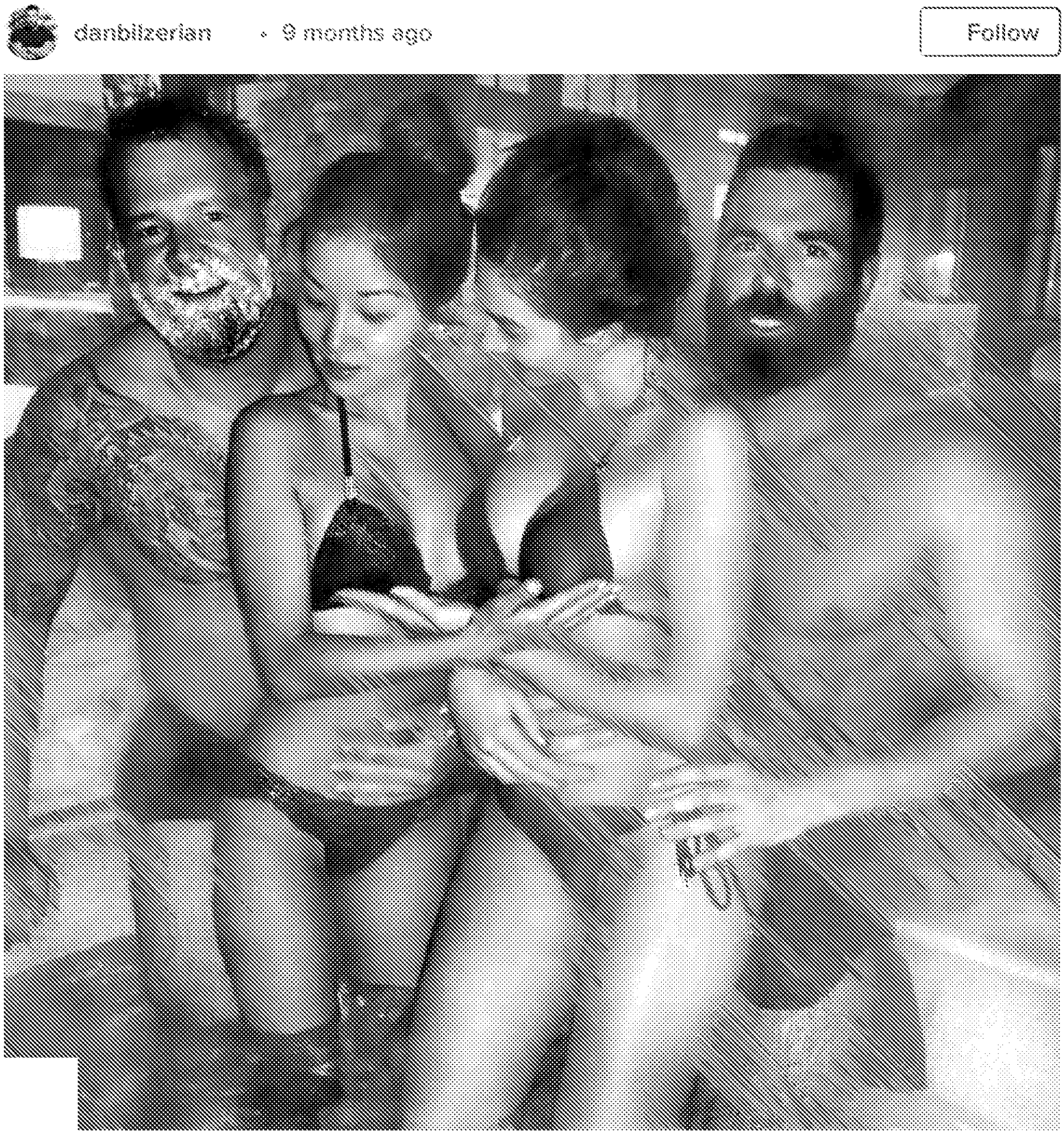
347.9k likes 29.7k comments

He gets his hair cut by bare-breasted women in bow ties. He buys a new pick-up truck so he can carry around his 20mm anti-tank gun. He makes eight-digit bets on poker games. And he takes mobile phone portraits of himself next to his customised Gulfstream IV jet, which has his personal trademark – a headshot of his pet goat, Zeus – painted on the tail. He is the ultimate antidote,

in other words, to adorably posed selfies of Justin Bieber and other sappy, endorsement-soliciting celebrities.



Indeed, when Bilzerian isn't naked in his photos – he has skinny, hairy legs, a bone-deep tan, and a laser-treated chest that resembles a ribbed condom filled with rocks – he is typically dressed in a pseudo-military get-up of dark T-shirt, boots and cargo pants. His captions, meanwhile, are pithy enough to command

a million-strong Twitter fanbase of their own. "Parking has proven to be less of an issue than previously anticipated," he wrote recently, linking to an image of his six-wheeled, $625,000 Brabus G63 AMG , its rear tyres mounted on the stairway of what appeared to be someone's LA home.

In another tweet, he mused: "My greatest fear is that someone will break in and I won't be able to decide what gun to shoot them with." Attached was an image

of his dining room table, covered with several assault rifles, pistols and magazines.

But as new facts about Bilzerian emerge, a more confusing picture of this bearded internet outlaw is beginning to form.

A *Wall Street Journal* investigation has revealed that his father, Paul Bilzerian – who now resides on St Kitts in the West Indies – is a convicted fraudster who has paid only $3.7m (£2.3m) of a two-decade old $62m (£39m) judgement against him. Naturally, questions have been raised over how much, if any, of Bilzerian's money comes from his father. (Bilzerian declined through his representatives to talk to GQ.) Meanwhile, a porn star has said that she may sue Bilzerian for breaking her foot when he threw her off the roof of his house into his pool – a stunt organised by *Hustler* magazine that almost killed them both. (The actress, naked at the time, panicked at the last second and grabbed on to the Instagram star's T-shirt. Her lawyer's threat drew a response from Bilzerian that read, "Like your client, the facts of the claim won't, quite, fly.")

Dan Bilzerian
@DanBilzerian

Follow

Headed back to LA to film w @Gwarren333

3:47 PM - 20 Jan 2015

61 405

In December last year, Bilzerian's behaviour hit headlines again, when footage emerged allegedly showing him kicking a woman in the face while out celebrating his birthday at LIV Nightclub in Miami. The woman, who is reportedly taking legal action, said she was left "bleeding from her eye". Bilzerian denied the allegations and said he was merely protecting another woman he was with at the time.

And then, of course, there have been Bilzerian's health problems, which have included two heart attacks at the age of 25 – he was supposedly treated by

Michael Jackson's former doctor, Conrad Murray – and a more recent pulmonary embolism, caused by an overly ambitious schedule of poker, booze and sex between Las Vegas and Hawaii.

"Going for a run," tweeted Bilzerian after checking himself out of hospital early. "I'll bet a million dollars I don't die. Any takers?"

If anything is going to kill Dan Bilzerian, however, those who've spent time with him say that it almost certainly won't be a blocked artery. "There are guns lying around casually in literally every room in his house," as Jonathan Grotenstein, a poker player and senior *All In* magazine contributor, tells GQ. "Before you walk in, his security guard takes you aside and warns you not to touch them, because they're all chambered and loaded. You look at the guns, and you look at all these women coming and going... and it's hard not to wonder how it's all going to end."

danbilzerian • 13 months ago

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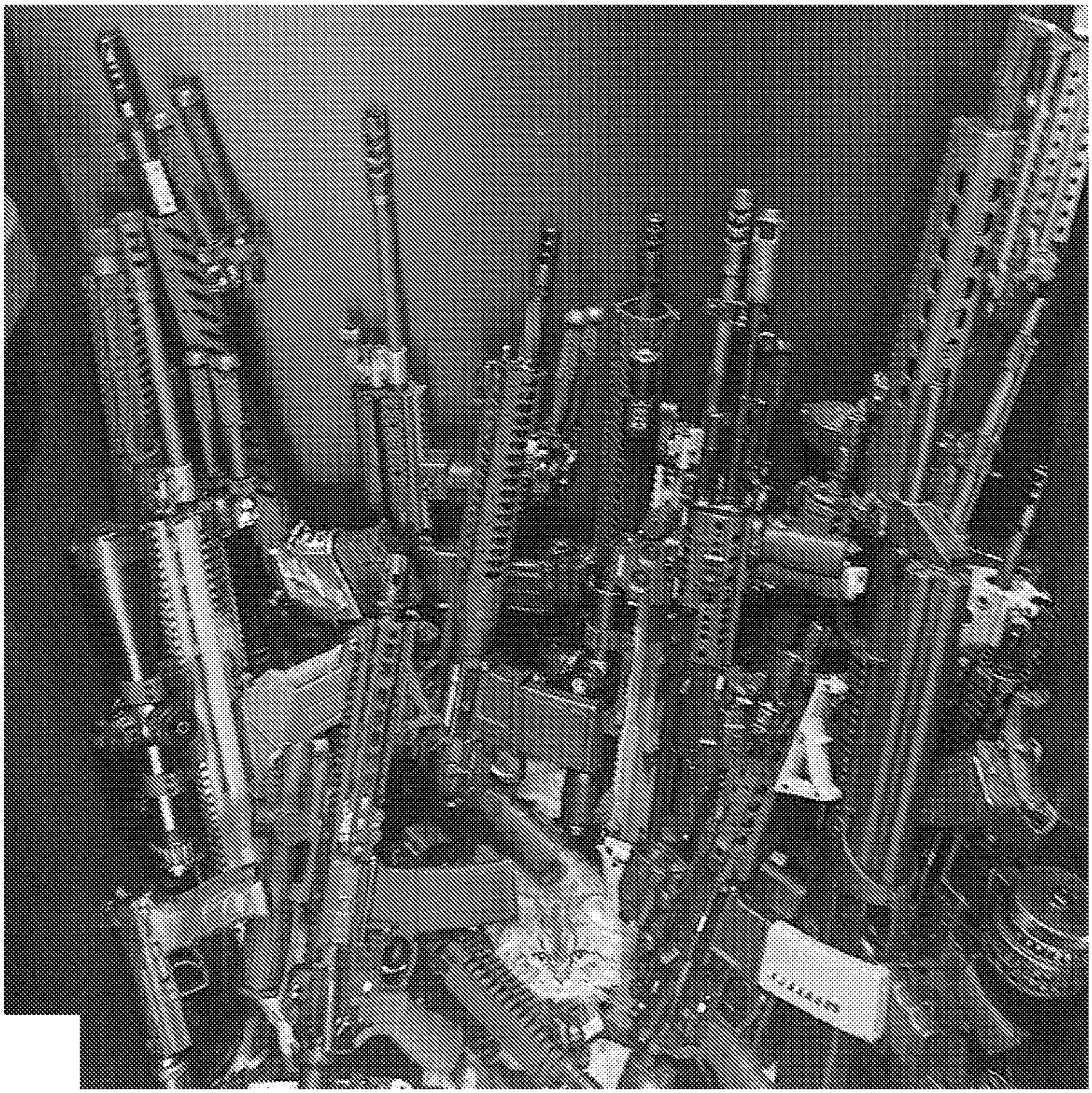

294.8k likes 11.9k comments

The details of Dan Bilzerian's early life read more like a Marvel Comics origins story than the biography of a real human being.

He grew up in Tampa, Florida, in an eleven-bedroom mansion that was half the size of Buckingham Palace, with its own indoor basketball court, batting cage, lake-front views, swimming pool, water slide, and an "imported volcanic rock mountain". His dad, descended from survivors of the Armenian

diaspora, owned a robotics company, among other investments. Meanwhile, pretty much everyone in his family, including Dan, his mum, Terri, and his little brother, Adam, has a near-genius-level IQ.

Bilzerian, however, had a lonely and often stressful childhood.

His dad, an elaborately mustachioed and sideburned former juvenile delinquent who'd fought in Vietnam and been a disruptive presence at Harvard Business School, was absent much of the time, working on exotic deals. And when the old man was around, his stubborn, take-no-prisoners attitude tended to make life difficult - such as when he sued his son's Little League baseball team for slander in an argument over a $5,000 donation, only for the case later to be dismissed.

"Basically I didn't get a ton of attention as a kid," Bilzerian has admitted, "I guess that's why I'm such a flashy lunatic."

When Bilzerian Sr did finally spend some time with his son, it was to drive him to school one day just after he'd turned ten years old.

As the car pulled up to the gates, however, the young Bilzerian realised something was wrong. That's when his dad broke the news: he was going to prison. In a case beyond a primary schooler's understanding, Bilzerian Sr had been found guilty on nine counts of stock and tax fraud, mostly related to a classic pump-and-dump operation that involved "parking" investments in public companies, staging hostile takeover bids, then offloading the investments as the share prices rocketed. The judge in the case said that the "lure of money" had caused Bilzerian Sr "to lose... proper perspective".

With his dad behind bars, Bilzerian faced ridicule from his classmates, and he began to show his own contempt for authority, getting expelled from two schools in one year, and ending up in a military academy under the care of drill instructors. After that, the family moved more than 2,000 miles northwest to

Utah, where Bilzerian Sr, out on parole, bought a new company.

The family trip to Mormon-land went about as well as could be expected.

As his dad became embroiled in yet more litigation, Bilzerian arrived at school one day with an M16 machine gun in the boot of his car. The weapon, Bilzerian has since explained, was his dad's from Vietnam: "I was so proud of the damn thing, I was showing everybody." Neither the school nor the authorities had much sympathy, however. This time, in fact, Bilzerian wasn't just expelled. He says he was asked to leave Utah and not come back.

Not knowing what to do with himself, Bilzerian joined the Navy and began training for the Seal division, now well known for killing the al-Qaeda leader Osama bin Laden.

The initial course for Seals - known as Basic Underwater Demolition/Seal training, or BUD/S - is held at the Naval Special Warfare Training Center in Coronado, California, and is supposed to take 24 weeks. Bilzerian says he was there for 510 days, including two so-called "hell weeks" - the first of which he completed with a broken leg. (He'd bet his medical officer $20 that he could do it.) Three quarters of Seal trainees don't graduate, however, and Bilzerian was no different: after his second attempt, he dropped out permanently over a safety violation. Indeed, some Navy veterans have questioned just how close Bilzerian ever came to being a Seal. Even if he'd have completed BUD/S, they point out, he would have still had to undergo Seal qualification training, an even more intimidating 26-week course in tactical skills, including free-fall parachute jumps.

Bilzerian himself has admitted that one of the officers took a dislike to him. And although his dad had distinguished himself in Vietnam with a Bronze star, being the son of Paul Bilzerian was also a liability. Especially when news got out that his old man, while technically bankrupt was still living in his Xanadu-like mansion in Tampa. Eventually, after an FBI raid, the ex-corporate raider was thrown back in jail.

danbilzerian • 11 months ago

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399.2k likes 22.2k comments

As for where Bilzerian Sr's fortune had actually gone, or whether it was anywhere near the half a billion dollars that some have estimated – it's anyone guess. According to reports, the family house was eventually sold in a series of Byzantine transactions, ending up partly owned by a charity named after the family's cat. Other assets found their way to the Cook Islands in the South Pacific. There was one holding, however, that Bilzerian Sr made sure to

diligently report to the authorities: the balance of his prison commissary account. As of the last filing, it was precisely 23 cents.

The younger Bilzerian has never denied that he has trust funds in his name. In fact, while he was still in Seal training, the government pressured him into putting up a third of one of them to get his dad out of jail – an act of generosity that didn't go down well at home. "He wouldn't talk to me for eight months," Bilzerian said. "He's some hard-headed bastard."

That was about when the gambling began.

Bilzerian says he learned to play poker at the University of Florida, where he enrolled after the Navy to study business and criminology – funded by a $6,000-a-month "disability allowance as a veteran" that he qualified for due to his injuries and honourable discharge.

By his second year, he'd gone broke, apparently with no access to the assets of which he was a beneficiary. Forced to sell his guns, Bilzerian returned to the poker table with a near-pathological focus. "You have to go broke to respect the money," he has said of his losses. "And I had a style where I could make a lot of money if I had self-control."

"Some weeks I was making, like, $90,000," he has explained, "so I'm looking at these professors, thinking, what am I doing here?"

Dan Bilzerian

The way Bilzerian tells it, he turned the $750 he had left over from liquidating his possessions into $10,000. Then he bought a one-way ticket to Las Vegas and turned that $10,000 into $187,000. With this sizeable bankroll, he then went back to university, more determined than ever, and resumed his studies while

continuing to hone his skills in "cash games" after classes. (The potential winnings in cash games are essentially unlimited, whereas tournaments have fixed buy-ins and fixed prizes.)

Bilzerian never did finish his degree.

"Some weeks I was making, like, $90,000," he has explained, "so I'm looking at these professors, thinking, what am I doing here?"

Bilzerian was 27 when he first came to the attention of the high-stakes poker crowd. It was 2007, and he'd booked himself into Harveys Lake Tahoe, a 740-room hotel on the border of California and Nevada, with a suitcase filled with $100,000 in used bank notes. "He was not playing wild at all," recalled Todd "DanDruff" Witteles, a well-known player, when describing his first game with Bilzerian to Poker News, a website owned by Antanas Guogo, a Lithuanian-Australian businessman known as the "Australian Airbag" and the "Mouth From Down Under".

"The game was very nitty [no one betting much] and he basically wanted everyone else to start playing loose before he did," added Witteles. "I think he was just mad that people saw him as the rich fish [bad player] from whom they could extract money. Not surprisingly, the game stayed tight, and he finally got up and left."

Bilzerian's first attempt to win a big tournament – where exaggerating your wins is impossible, due to the very public nature of the proceedings – was similarly disappointing. He entered with his brother, Adam (who by then had renounced his US citizenship and written a book on the subject) and ended up in 180th place with $36,000 in prize money.

"I wanted to kill myself," he later told *All In* magazine. (The winner, Joe Cada, took home $8.5m.) Nevertheless, the tournament's broadcaster, ESPN, took note of Bilzerian's charisma and gave him plenty of on-screen time, which led

to a sponsorship deal with Victory Poker, a now-defunct online cardroom. That, in turn, led to some of Bilzerian's first public stunts. He bet $400,000 on a drag race with his lawyer. He swam through an alligator-filled lake at midnight. He fired a 50-caliber machine gun at an RV in the desert until it burst into a flames. And along the way, he turned down an offer of $100,000 from one of the (unnamed) founders of Facebook to shave off his beard.

Meanwhile, in private cash games, Bilzerian became known for playing "loose aggressive" – in other words, betting big and betting often, to the delight of his ultra-wealthy fellow players. In one moment of madness, he flipped a coin for $2.3m (£1.4m) of chips... And lost.

Before long, Bilzerian had gone from high stakes to so-called "nosebleed stakes" at games hosted at his Los Angeles home with an assortment of billionaires and celebrity friends, including the *Spider-Man* actor Tobey Maguire, the film director Nick Cassavetes, and the action star Mark Wahlberg. He was voted "funniest poker player" by *Bluff* magazine in 2010. And in one blow-out trip to Cannes, he allegedly slept with 16 women in 12 days. Even when one of his fellow players turned out to be the operator of a $25m Bernie Madoff-style ponzi scheme he kept on going. And when Victory Poker chose to shut down its US operations, Bilzerian moved his antics to his newly opened social media accounts. Soon enough, he had tweeted about his girlfriend's vagina, boasted of how his dad had bought him a Bentley for Christmas, and announced that he intended to spend $16,000-a-year drinking nothing but coconut water.

danbilzerian • 13 months ago

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285k likes 10.5k comments

Today, Bilzerian lives in a gated estate in the Hollywood Hills, where his neighbours include the likes of Leonardo DiCaprio and the nightclub impresario (and billionaire's son) Sam "Sammy Boy" Nazarian. The house has a sunken living room, 270-degree views over the city, a pool that hangs out over the hillside, cash-counting machines, poker tables, and a garage for his chrome-plated 1965 AC Cobra (vanity plate: "SUCK IT") and his white-with-black-rims Lamborghini Aventador ("MR GOAT"). He shares the place with his cat,

Smushball, and Zeus the goat – plus a new goat, Beatrice, to keep the former company. They sleep on a $700 blanket outside.

danbilzerian • 12 months ago

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The 34-year-old poker player is said to have another home in La Jolla, a beach town near Mexico, which resembles Tony Stark's headquarters in Iron Man. And then of course there's his crashpad in Las Vegas, which at one point was an apartment at the Panorama Towers, developed by Britain's Andrew Sasson.

As for women: Bilzerian is no longer in a relationship with Playboy playmate Jessa Hinton, who told a reporter that she slapped Bilzerian when she read a tabloid account of drugs and prostitutes at private Hollywood card games.

Meanwhile, Bilzerian's sometimes cruel depictions of women elsewhere ("Ugly girls hurt my eyes," he has tweeted, attaching a picture of several females with one of their faces scribbled out in red pen) have led some to accuse him of misogyny.

It's the *money* that continues to provoke the most debate, however.

Some believe he made his own fortune in poker before his trust funds became accessible. Others argue that, quite the opposite, Bilzerian can only afford to take part in nosebleed-stakes games because of his dad's offshore assets, and that rival players don't just regard him as a fish [bad player], they see him as the ultimate whale [a fish with a seemingly never-ending bankroll].

When interviewed in July by the radio host Howard Stern, Bilzerian declared that he was worth around $100m (£63m) - $50m (£31m) of it from the previous year's winnings - and said he has 20 employees, including three assistants and three chefs. (Bilzerian, it should be noted, doesn't pretend to be among the world's best poker players. He simply argues that he has access to, and is good at picking, the most lucrative private cash games.)

Few are convinced of the accuracy of those numbers, however.

"Does he have $100m?" asks Jonathan Grotenstein, the poker player who visited his home in LA recently. "No, I don't think he has access to that kind of money. He plays poker at really, really high stakes, but he's not playing in the top games with guys like Tom Dwan, or going to Macau, where million-dollar pots are won and lost all the time. I think Dan is more about using poker as part of an image that he's trying to create, and I think there are a lot of people out there who will lend him a private jet, or let him test drive a ridiculous car."

danbilzerian • 18 months ago

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75.9k likes 6,975 comments

GQ couldn't establish if Bilzerian does indeed own a Gulfstream IV or a Lamborghini – or whether he in fact rents his home in LA for $35,000 a month from Wong Ngit Liong, one of the richest men in Singapore, as has been rumoured online. An interior designer who studied a photograph of his bedroom, meanwhile, concluded that the furniture was from West Elm, barely more expensive than Ikea. There are plenty of other sceptics, including a gossip blog, The Dirty , which routinely mocks Bilzerian's reputation as "the most

interesting man on Instagram" – a moniker inspired by the Dos Equis beer advertisements.

"Fake Equis" is how the site refers to him.

What is undeniable, however, is that Bilzerian has displayed a lot of savvy in developing an entirely new kind of celebrity – and has carried it off with a nihilistic, gonzo-esque sense of humour that has for the most part diffused its more abusive undertones.

Often, in fact, he seems to be sending-up his own image while at the same time revelling in it. "While this new watch may not get me any pussy," as he tweeted a few months ago, along with a picture of his $800,000 Richard Mille timepiece, "it does make me feel better about being neglected as a child". Later, he faked his own arrest and disappeared for a few hours... only to re-emerge with a video of himself doing donuts in a police car, sirens blaring, with what looked like a whiskey bottle in his hand.

Bilzerian's talent for calculated risk is also beyond question. When he invested $1m in the Mark Wahlberg war film *Lone Survivor*, for example, it was conditional upon him getting at least eight minutes of screen time and 80 words of dialogue. When his role was cut to almost nothing, he sued, revealing a contract that read more like a hedge-fund position than a Hollywood deal. And yet in the end, having reaped all the publicity, he dropped his case, arguing that the film had been so successful, he didn't *want* his money back – because he'd made $1.5m on the back end. Similarly astute was his decision to put up 20 per cent of the $10,000 buy-in for an up-and-coming poker star, Jay Farber, at the 2013 World Series of Poker. When Farber won $5m, Bilzerian was able to claim a $1m cut. What's more: he got to sit in the front row, getting his beard stroked by a model on live television.

danbilzerian • 16 months ago

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134.6k likes 2,501 comments

Whatever Bilzerian's endgame might be, however, it isn't yet clear.

Over recent months he has replaced his publicist with a new firm; quietly dropped his description of himself as an "asshole" on Twitter; played up his donations to charity; and became uncharacteristically shy when approached by GQ. Could this mean the Instagram King is craving some respectability? Or would that destroy the allure he has so assiduously cultivated over the months

since his breakthrough?

Bilzerian has already hinted at the answer in a self-leaked text message exchange with his social media manager, Greg Baroth, who complained that some of his client's more lurid behaviour wasn't a brand-friendly idea and could turn-off future sponsors. "Oh well," wrote Bilzerian, before posting an image of himself on a yellow life raft, being carried through a crowded nightclub with a naked woman in Christian Louboutins lying face-down next to him. "Good thing I'm rich and I don't give a f***."

Originally published in the **February issue of British GQ**

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London, United Kingdom

Gangsta.

Like · Reply · Aug 31, 2015 12:58pm

Nazia Ahmed ·
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Female kim kardashian anyone?

Like · Reply · 2 · Aug 29, 2015 3:33am

Zeus Zeta

She's already female.

Like · Reply · Sep 2, 2015 4:44am

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Zeus Zeta Oh wow oops. I thought Bilzerian was a guy all this time.

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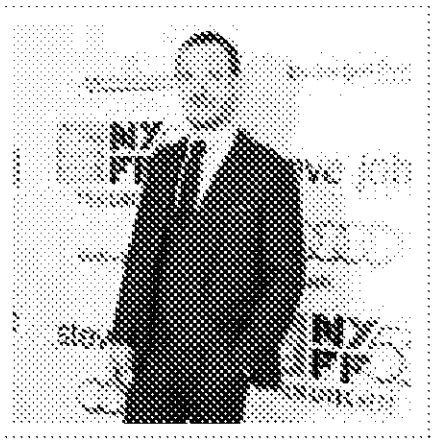

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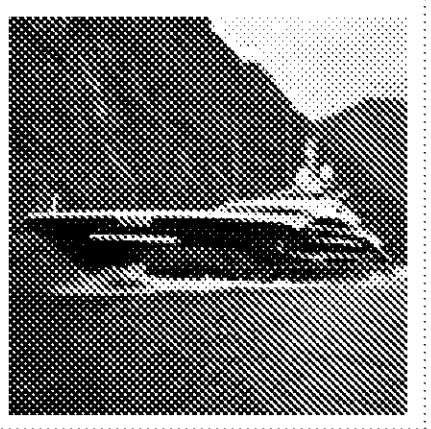

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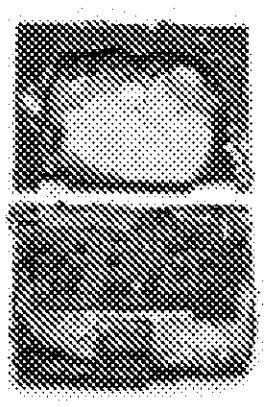

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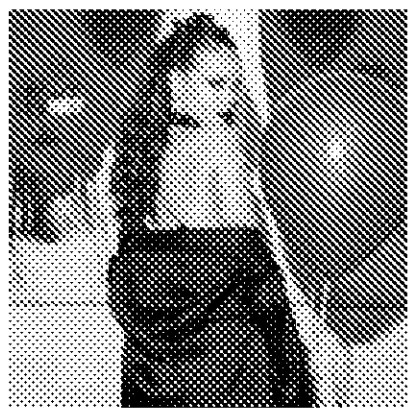

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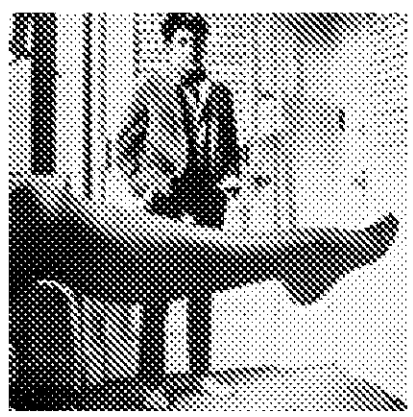

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Monica Bellucci in Spectre is the oldest Bond gir... excuse us, woman to seduce a Bond, at the age of 51, several years 007's senior. Fancy making like Bond and seducing an older sophisticated Lady? Get in line.

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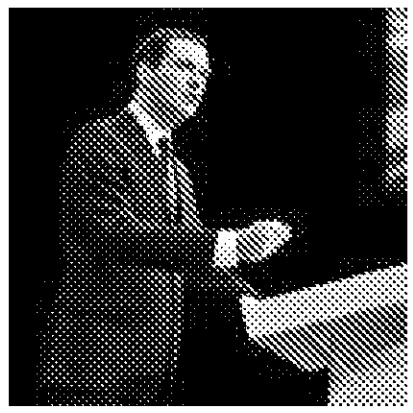

The Tories are stealing Labour's best ideas

While Jeremy Corbyn was outside Manchester Cathedral exciting a rally of thousands of activists, George Osborne was at the Conservative Party Conference stealing Labour's best policies

How one man revealed Jack the Ripper's identity: the full story

Bruce Robinson has spent the last 12 years on the hunt for Jack the Ripper. Now, he says he's found him

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EXHIBIT 3

Brogan Driscoll,
'King of Instagram' Dan Bilzerian
Banned For Life From Nightclub For
Kicking A Woman In The Face,
THE HUFFINGTON POST (August 12, 2014)

9 October 2015

HUFF POST | BUILDING MODERN MEN

'King Of Instagram' Dan Bilzerian Banned For Life From Nightclub For Kicking A Woman In The Face

The Huffington Post UK | By Brogan Driscoll

Posted: 08/12/2014 17:48 GMT | Updated: 11/12/2014 16:59 GMT

Dan Bilzerian, AKA 'the king of Instagram', has been reportedly banned from a Miami nightclub for "kicking a woman in the face" during a brawl.

Bilzerian - a millionaire venture capitalist and poker player, who has more than 5.8 million Instagram followers - was caught on camera in LIV Nightclub in Miami lashing out at the woman.

Writer Nik Richie, who captured the incident, posted the video to Instagram with the following caption: "He got kicked out of a famous Miami nightclub last night for assaulting a woman. This idiot kicked a woman in the face like it was no big deal. It's sad when you think you're invincible to society."

But instead of denying allegations, Richie claims that Bilzerian has tried to "justify his actions" in a comment on the original video (which, Richie claims, was swiftly deleted).

nikrichie • 10 months ago

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So instead of apologizing for kicking a woman in the face @danbilzerian justifies his actions with this statement he wrote on my Instagram (which he deleted shortly after posting). Judging from #DanBilzerian's written reaction he supports striking women. Totally the #RayRice of the internet and blames me for something he admits doing. What a loser. Glad I can show the world who this guy really is #womanbeater. And shame on the Miami Beach Police department for ignoring a serious crime.

12k likes 510 comments

"Actually 2 girls attacked a girl I was with to the point they gave her a black eye and threw her off the table and went after her, b/c they wanted to get closer to me," Bilzerian writes.

"I know girls never fight over you b/c you're a loser and everyone hates you, and nobody wants to f*** you, but how about you get you [sic] facts straight instead of publishing nonsense like your garbage website."

But according to an exclusive interview with The Dirty, the victim tells a different story.

"There were two girls standing next to me at the table that were fighting. People started getting shoved and I tried to separate them. Then Dan pushed me both off the banquette and once I fell he kicked me in the face.

"I wanted to file a police report and EMT checked my face I was bleeding from my eye but I felt fine and at that point I just wanted to go home. I really didn't see how serious it was until I watched the video for myself. I'm lucky that the injuries weren't worse."

She adds: "I did nothing to deserve that kick to head, I am gonna go ahead pursue legal action against him."

But kicking a woman in the face appears to be just the tip of the iceberg. A quick scroll through Bilzerian's Instagram throws up images of women's arses with the words "property of DB" written on them - and that's just the beginning.

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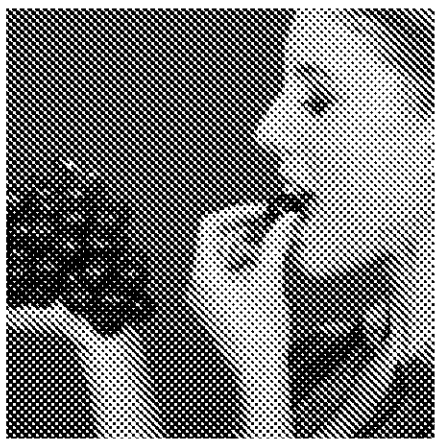

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Stacy Lewis · Pierre, South Dakota

Sounds like my abusive ex-husband, who justified punching me in the face by saying "it was my fault, too, because I wouldn't back down". He is a psychopath, and I hope that the woman he kicked takes him to the cleaners.

Like · Reply · 13 December 2014 12:43

Freddie Steady Go · Landfill Gas Collection System Technician at B9 Energy O&M

And yet all those women still want to hang around his neck... Why is that again?? $$$

Like · Reply · 2 · 12 December 2014 08:22

Gilad Luria Givon

I'm pretty sure there would have been no ban, nor any article anywhere, if he had kicked a man in the face - even if that man had done nothing to deserve it, unlike this woman.

Like · Reply · 9 · 9 December 2014 03:51

Ollie Morgans · London, United Kingdom

if it was a guy with the same stature as a girl then there probably would've been. ie if he kicked a (small) 15 yr old boy in the face there would probably be exactly the same repercussions.

If he kicked someone the same size in the face there probably wouldn't have been the same repercussions.

Simple shit, don't get all uppity about double standards when the situations are completely different.

Like · Reply · 15 · 9 December 2014 09:54

Christina Princess

Dan Bilzarian Banned for Life Miami Nightclub for Kicking Girl in Face
://theinternetlovesme.com/dan-bilzarian-banned-life.../

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Emiko Hashida · London, United Kingdom

he's quite a catch!

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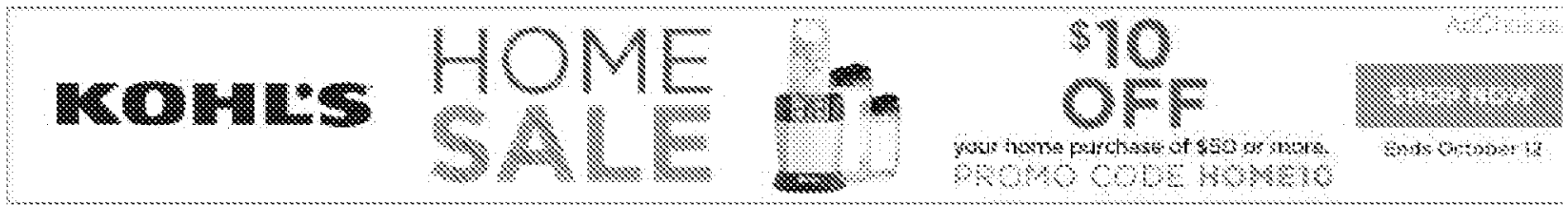
Lee Moran,
Instagram 'Playboy King' who
suffered 3 heart failures rebrands
as 'gentleman of poker,'
NEW YORK DAILY NEWS (Dec. 3, 2013)



Instagram 'Playboy King' who suffered 3 heart failures rebrands as 'gentleman of poker'

Dan Bilzerian, who is said to be worth more than $100 million, has built a reputation — thanks to his Instagram feed — of living a lavish lifestyle. But on three different occasions, it's backfired on him, with two heart attacks and the organ giving out during an attempt at an around-the-clock tournament. Now, Bilzerian is trying to rebrand as the 'gentleman of poker,' donating cash to charitable causes.

BY LEE MORAN / NEW YORK DAILY NEWS / Tuesday, December 3, 2013, 9:20 AM

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DAN BILZERIAN VIA INSTAGRAM

Multimillionaire poker star Dan Bilzerian (c.) with a bevy of beauties.

"Instagram's Playboy King" is a multimillionaire poker champ with a penchant for the finer things in life.

Dan Bilzerian's snaps of partying with near-naked women, riding in supercars and posing with guns has racked up more than 125,000 followers on the social networking site.

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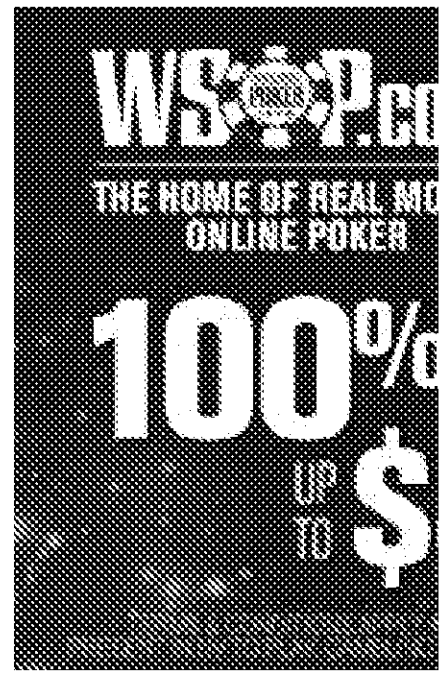

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danbilzerian • 26 months ago

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But his hedonistic, high-stakes lifestyle appears to have caught up on with him on several occasions, as it's emerged he's already suffered three serious heart conditions — and he's only 32.

The L.A.-based gambler, now said to be worth a staggering $100 million, joined the military after high school and made it 99% through Navy SEAL training.

But he was booted just two days before graduation for calling an officer a "p---y."

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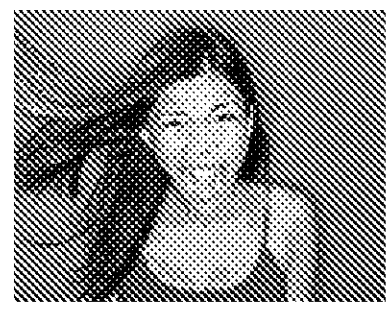

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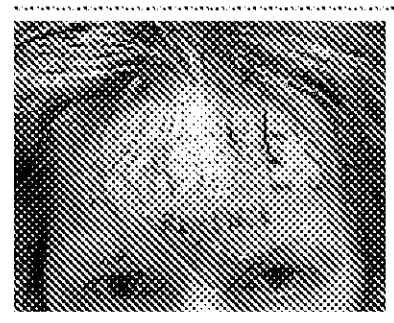

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Bilzerian's lavish life, as showcased on Instagram, amassed more than 125,000 followers.

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He ended up at the University of South Florida, where he started playing cards.

"I went broke after sophomore year, gambled away all my money, sold some guns, turned $750 into $10,000, flew to Vegas, turned 10 thou into $187,000, went back to school, played better," he told the Daily Dot.

Since then, he's won several tournaments and set up online games room Victory Poker.

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DAN BILZERIAN VIA INSTAGRAM

Bilzerian traveled around the world to take part in the poker circuit — and rarely did so alone, based on pictures from his Instagram feed.

DAN BILZERIAN VIA INSTAGRAM

Poker-playing bad boy Dan Bilzerian regularly posted photos on Instagram of guns and money, as well as supercars and, of course, beautiful women.

But Bilzerian's wild ways has resulted in some serious repercussions.

When he was 25, a crazy four-day snowboarding vacation ended in him suffering a double heart attack.

Then, in August 2011, his ticker gave out again after he flew between Maui and Las Vegas twice in three days to play in an around-the-clock tournament.

Doctors diagnosed him as having a pulmonary embolism.

"If you're familiar with his lifestyle, he's a bit of a daredevil. His body was absolutely overloaded after four days, and the heart condition happened," his PR rep Steve Honig told the Daily Dot.

But Honig claims Bilzerian is now in "perfect health," with the man himself saying he wants to tidy up his bad boy image" and rebrand himself as "the gentleman of poker."

To that end, he's set up a Robin Hood Project, which has seen him give away $100,000 to worthwhile projects.

They include helping Typhoon Haiyan victims, a couple who adopted four sick, underprivileged kids, and a third woman who lost all her limbs.

P.C. Richa
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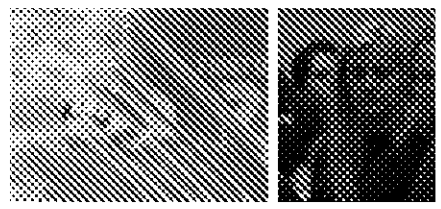

DAN BILZERIAN VIA INSTAGRAM

Bilzerian's lifestyle affected his heart — he suffered two heart attacks and had his heart give out while he was attempting to participate in an around-the-clock tournament.

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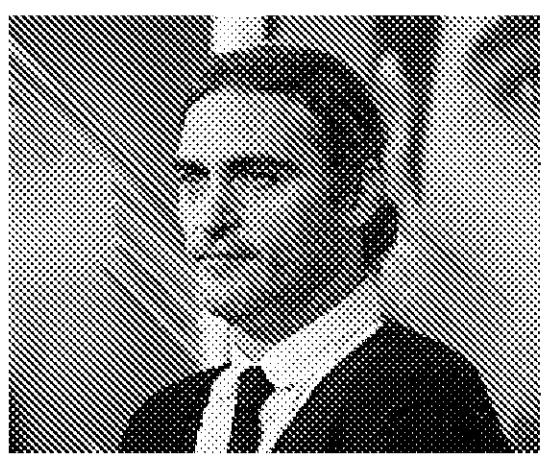

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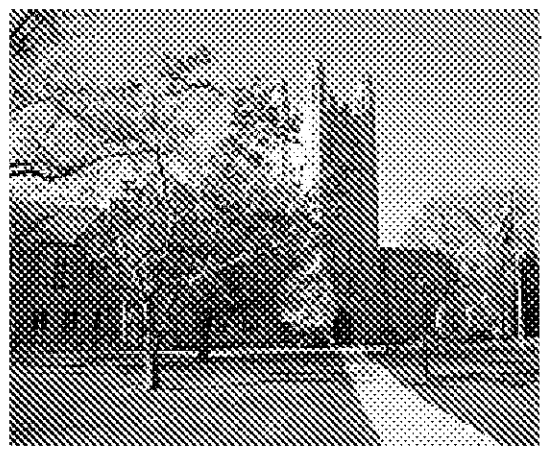

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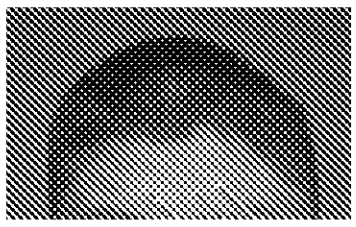

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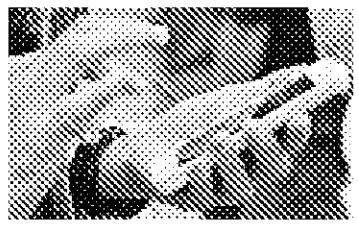

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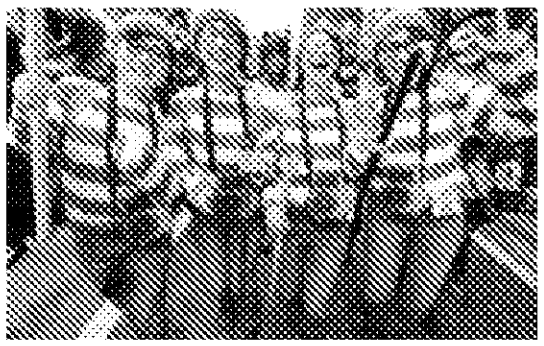

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BY SAVERS

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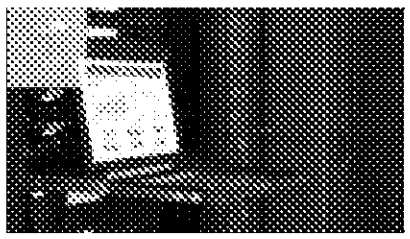

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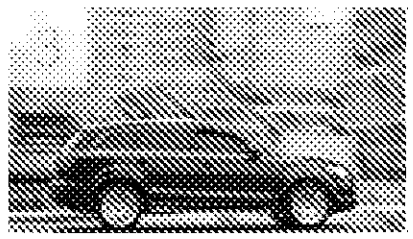

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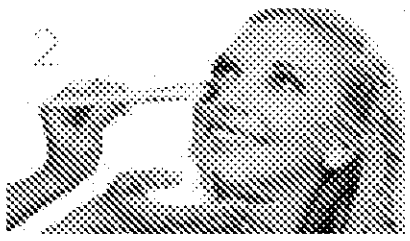

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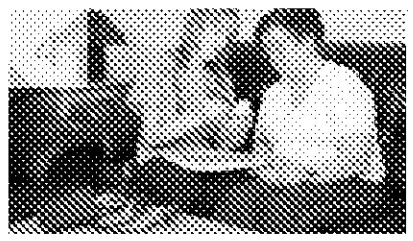

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675 days ago

Hell to the yea..Play on player..

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JOHN PETITTI 1

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More power to him, but he's only given away .0001% of his earnings, so he's got a ways to go before i

call him Robin Hood.

Like REPLY SHARE

IALWAYSWIN 0
674 days ago

Would 50% make you feel better? sheeesh let the man do what he do, stop hatin and sweatin. Play on Playa!!

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EXHIBIT 5

Sara C Nelson,
Dan Bilzerian's Naked Girls,
Guns & Goats: Inside The World of
Instagram's Poker Billionaire (PICTURES),
THE HUFFINGTON POST (May 14, 2014)

Dan Bilzerian's Naked Girls, Guns & Goats: Inside The World Of Instagram's Poker Billionaire (PICTURES)

Huffington Post UK | By Sara C Nelson

Posted: 14/05/2014 16:28 BST | Updated: 14/05/2014 17:59 BST

Dan Bilzerian is famous for being insanely rich and relentlessly promoting his playboy lifestyle to his near 2 million followers on Instagram.

He made his fortune playing poker and appears to spend his days surrounded by naked women and guns.

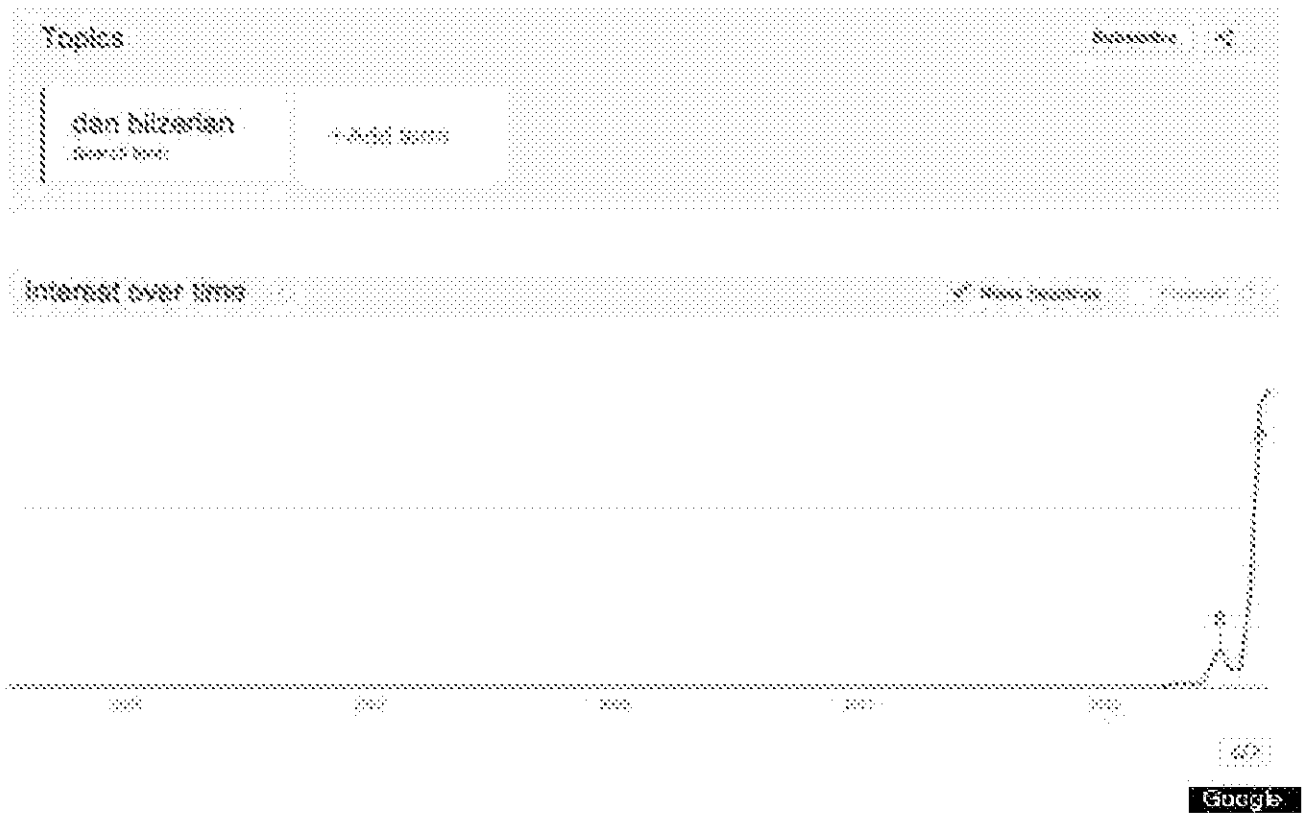
Recently, the 33-year-old hit the press after he hurled a naked porn star off the roof of his Hollywood Hills mansion.

Janice Griffith broke her foot on the way down and hinted at legal action during a later interview with TMZ.

But Bilzerian continues to heavily promote his Bacchanalian lifestyle nonetheless – with a recent post uploaded to Twitter *and* Instagram for good measure, musing: “You people may think it’s easy to ride motorcycles around the house butt naked and fuck big titty broads... Well it’s not, but.. #IDoItForThePeople."

It was of course, accompanied by a picture of himself naked, straddling a motorbike and flanked by two women.

In six hours the post had been “liked” by more than 106,000 people. What's more a Google trends search reveals a massive spike in online searches for the self-confessed "actor/ astronaut/ asshole" since February 2014.



A Google trends search has revealed a massive spike in interest in Bilzerian since February

As well as semi-naked women and weaponry, the bearded billionaire appears to be an animal lover too, peppering his Instagram with images of his various pets.

Including the lion-esque cat which occasionally accompanies him on his travels or poses amongst his guns, Bilzerian has recently acquired a “surly pet goat” named Zeus.

So with all these facts in mind, let's take a look at the world of Dan Bilzarian...

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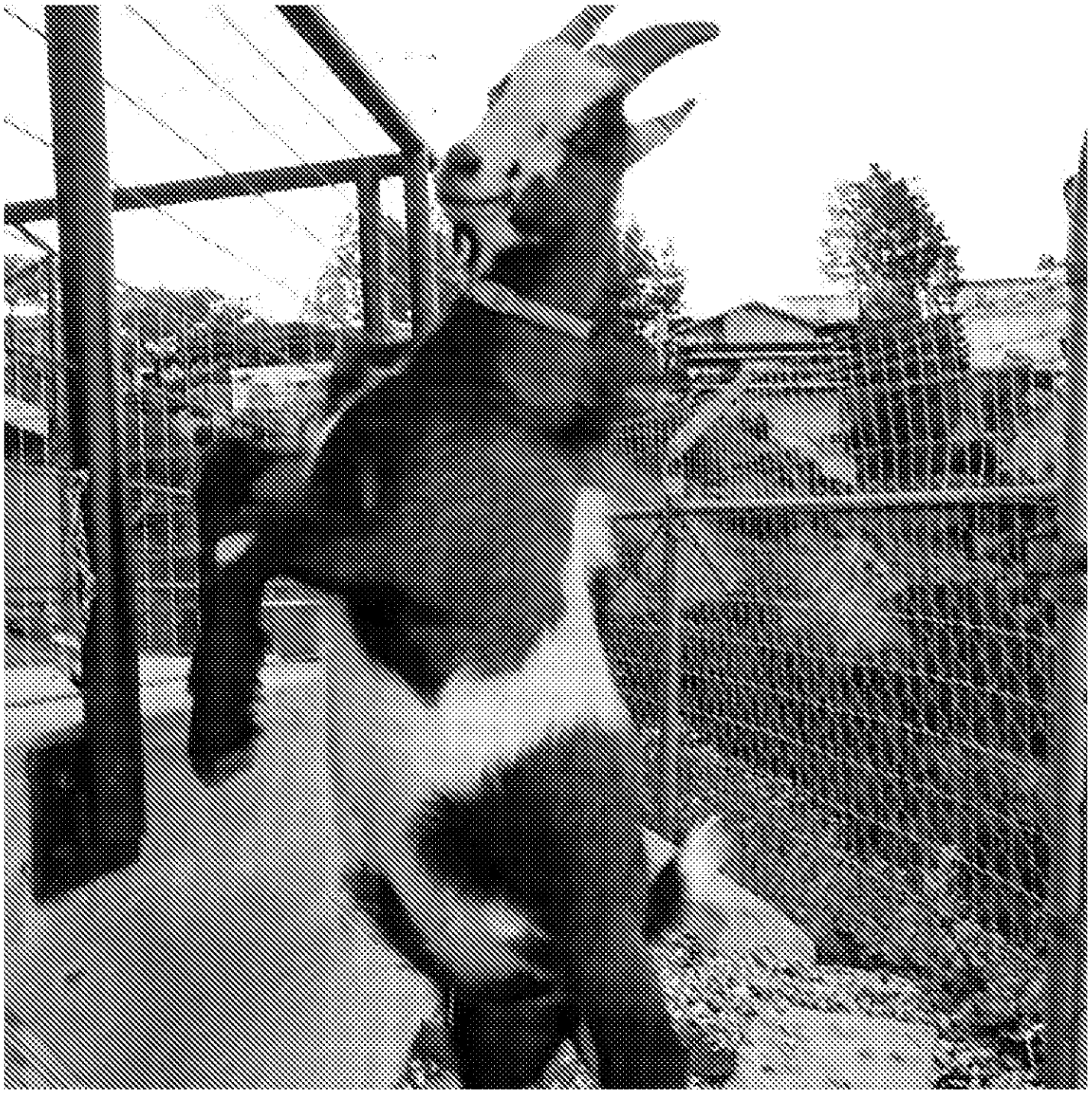
- 
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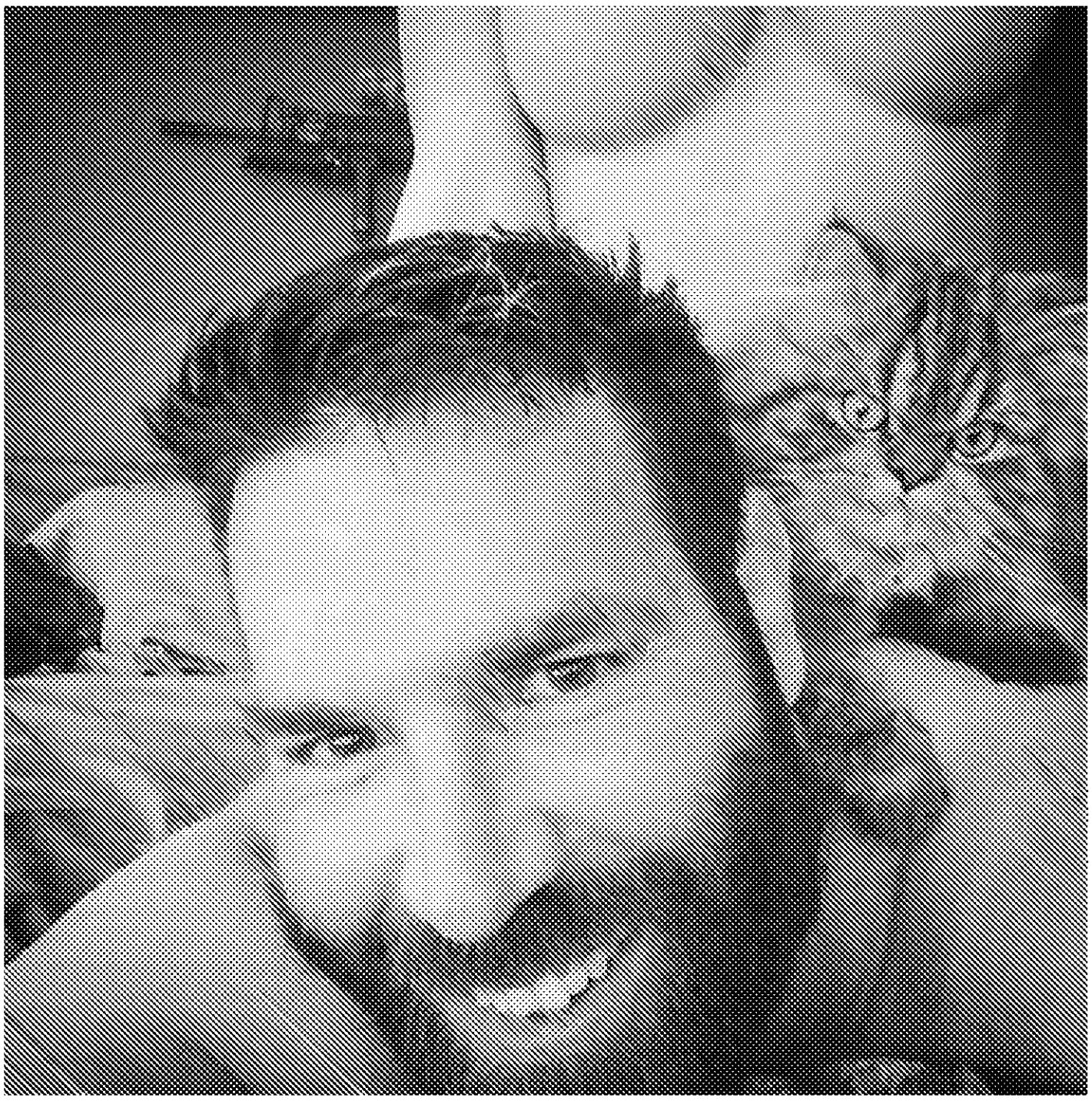

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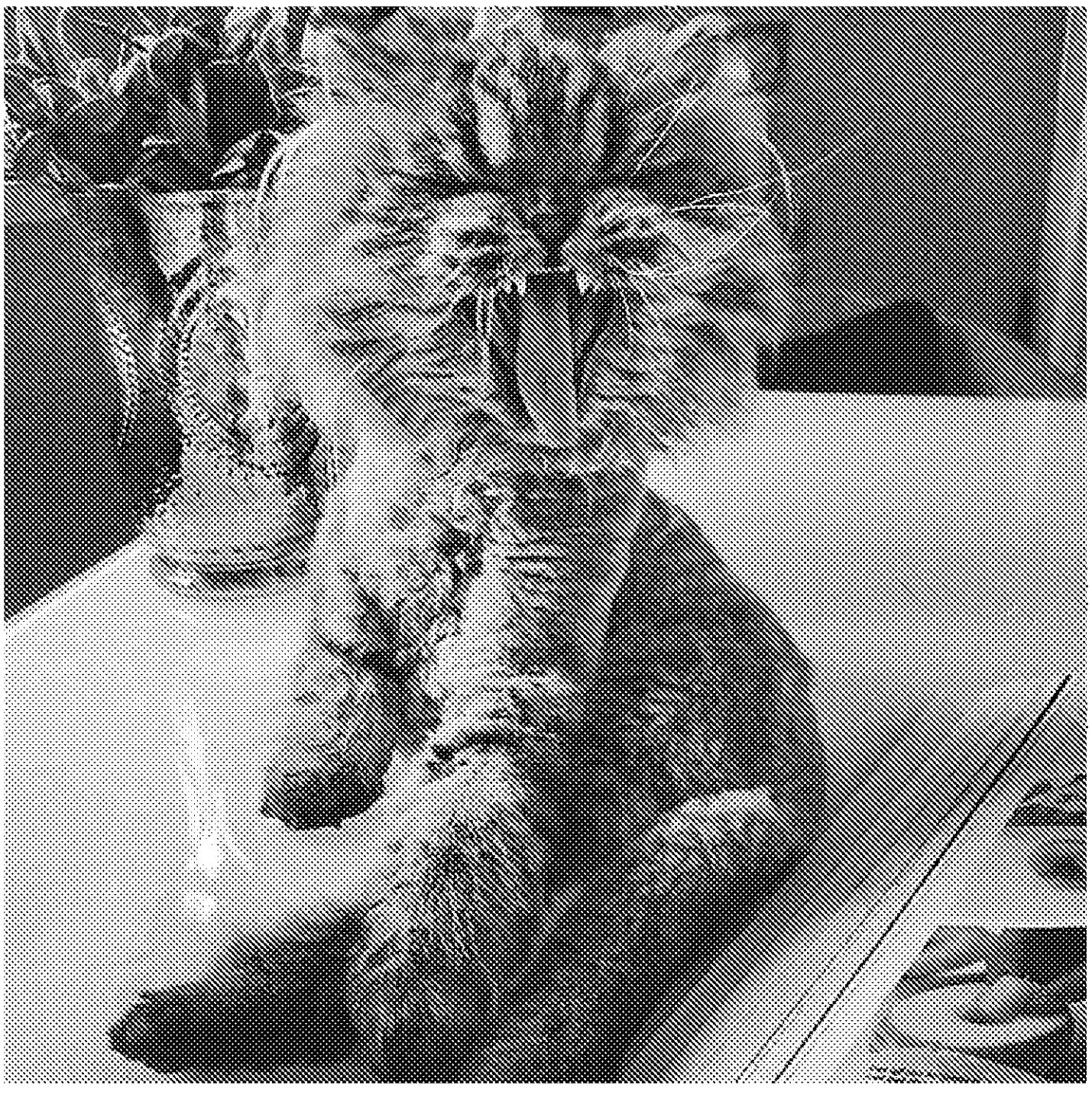
- 
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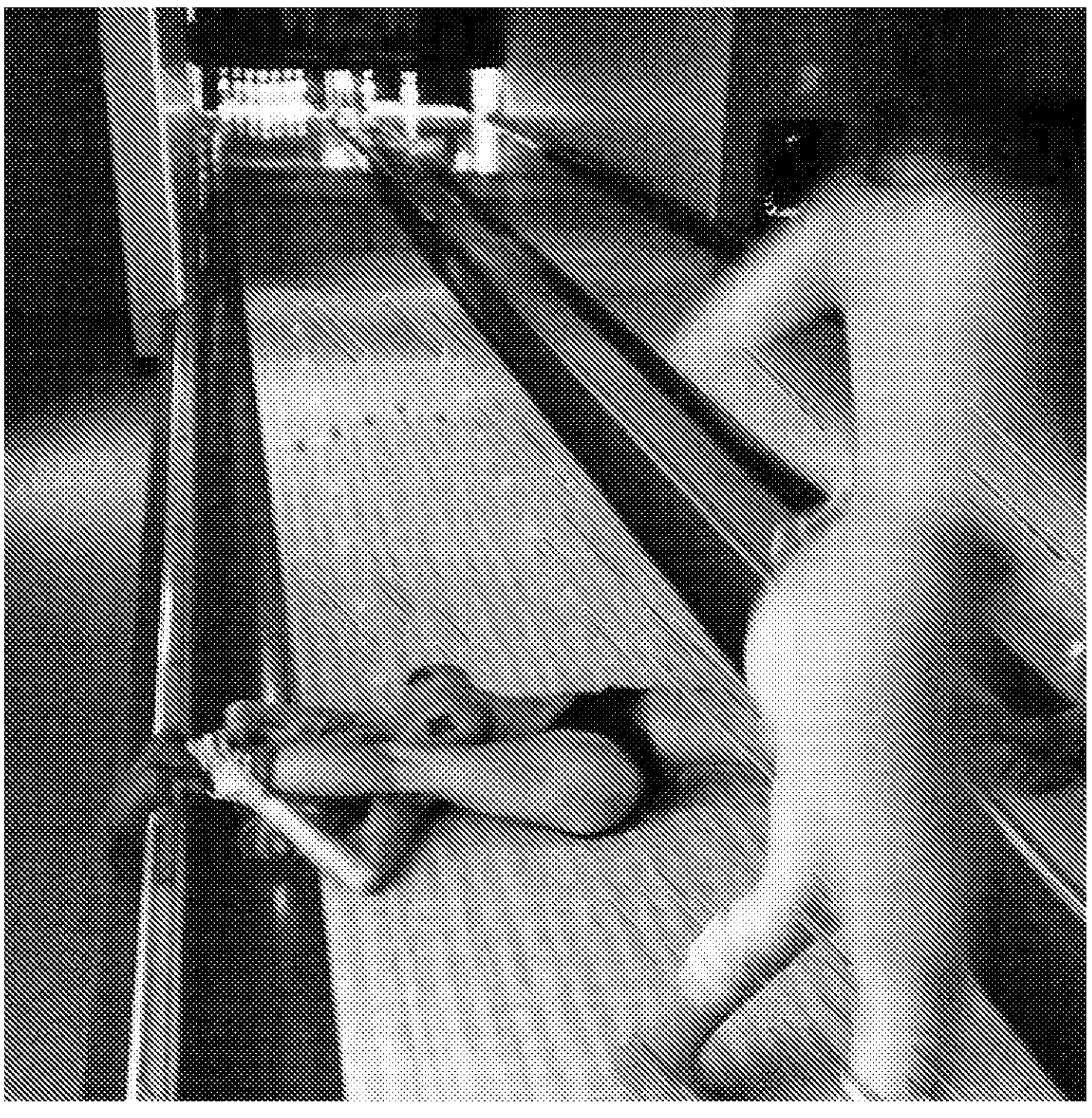
- 
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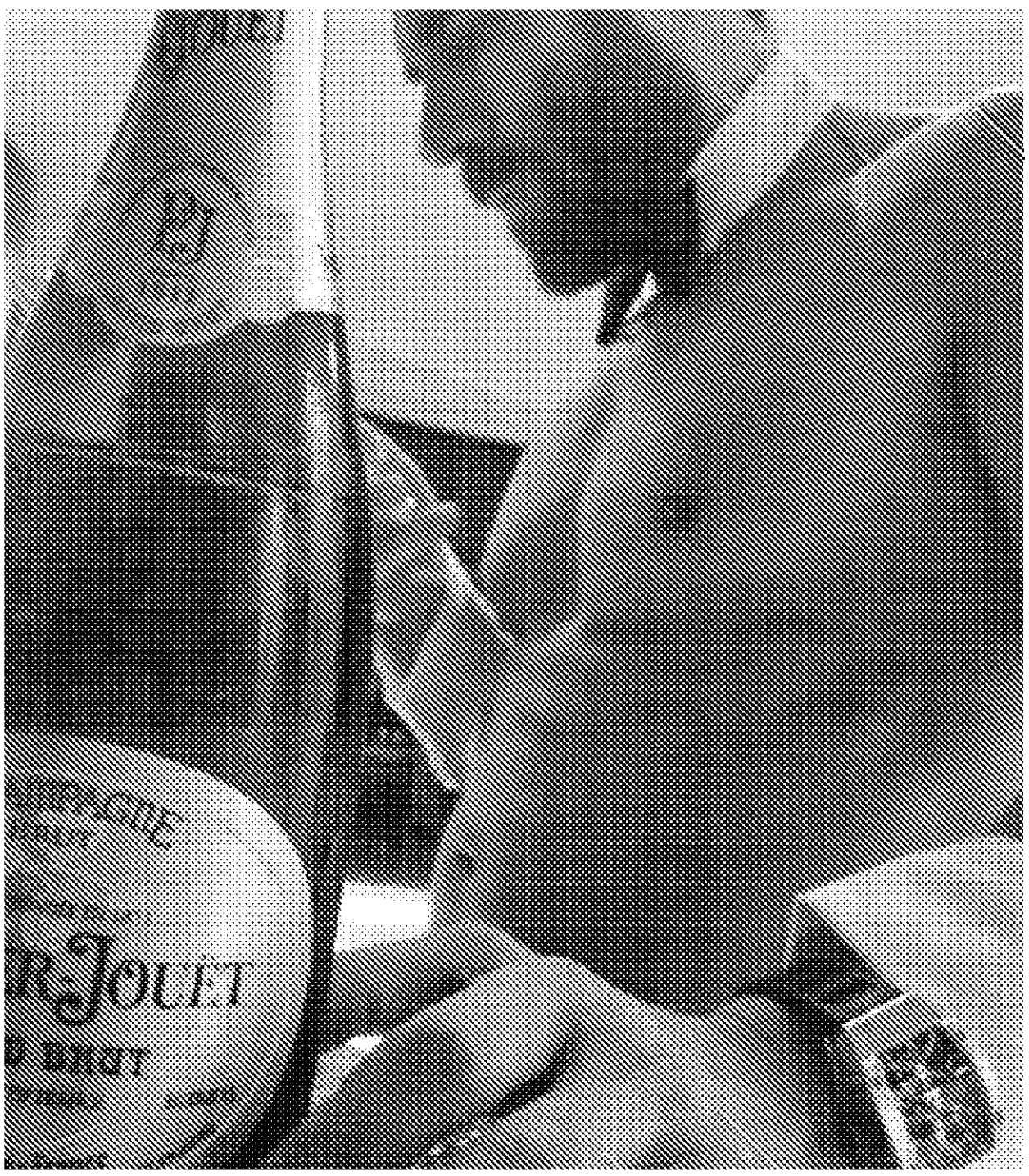

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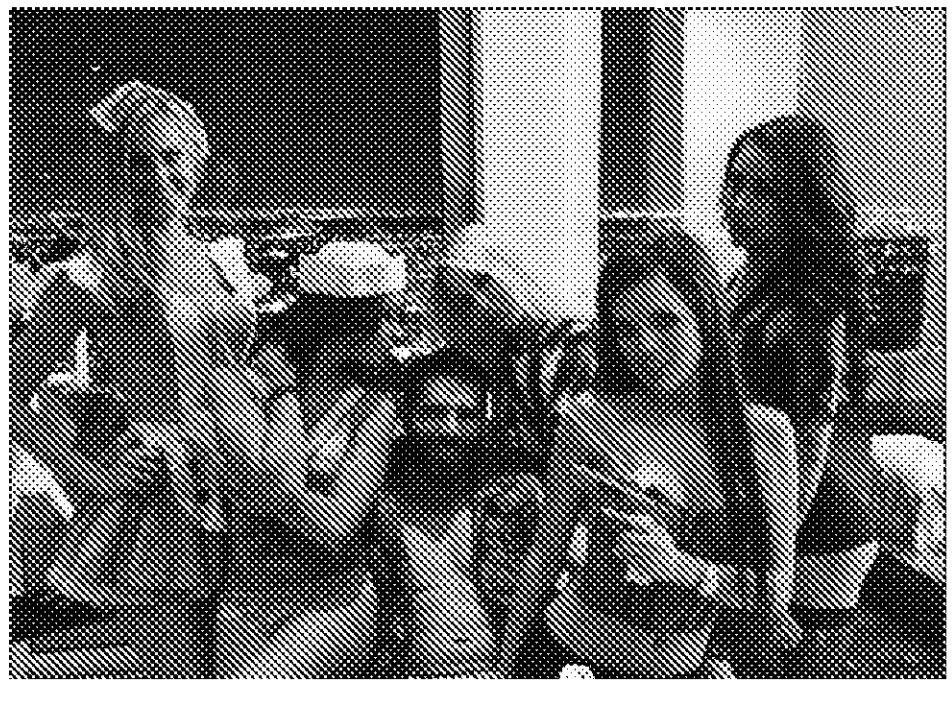

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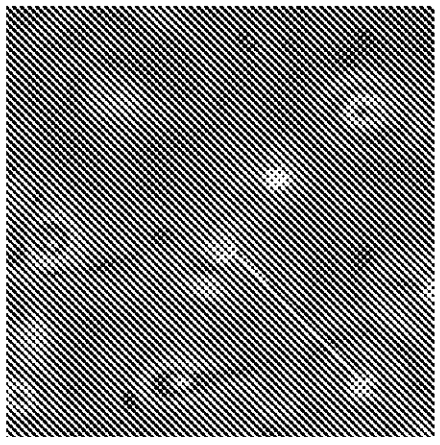

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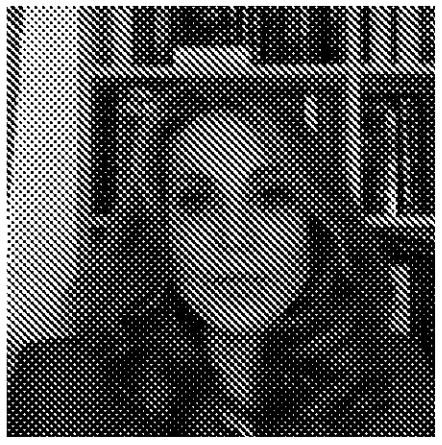

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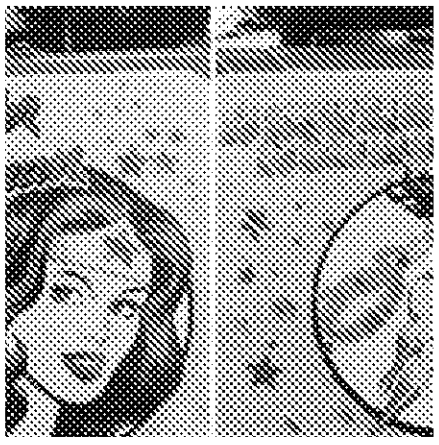

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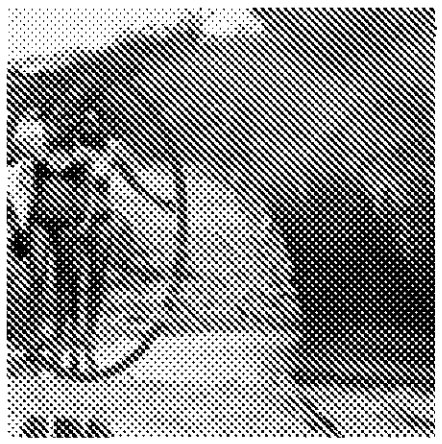

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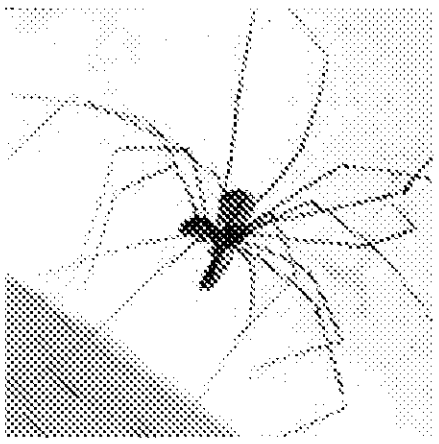

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EXHIBIT 6

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Dan Bilzerian 2016

MILLIONAIRE · PLAYBOY · POKER PLAYER
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16-TANK-TOP)

GOAT-VINTAGE-SHIRT)

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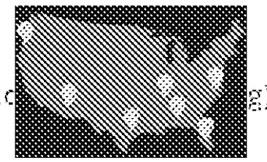

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EXHIBIT 7

Will Haskell,
'King of Instagram' Dan Bilzerian is
running for president,
BUSINESS INSIDER (Jun. 10, 2015)

BUSINESS INSIDER

'King of Instagram' Dan Bilzerian is running for president

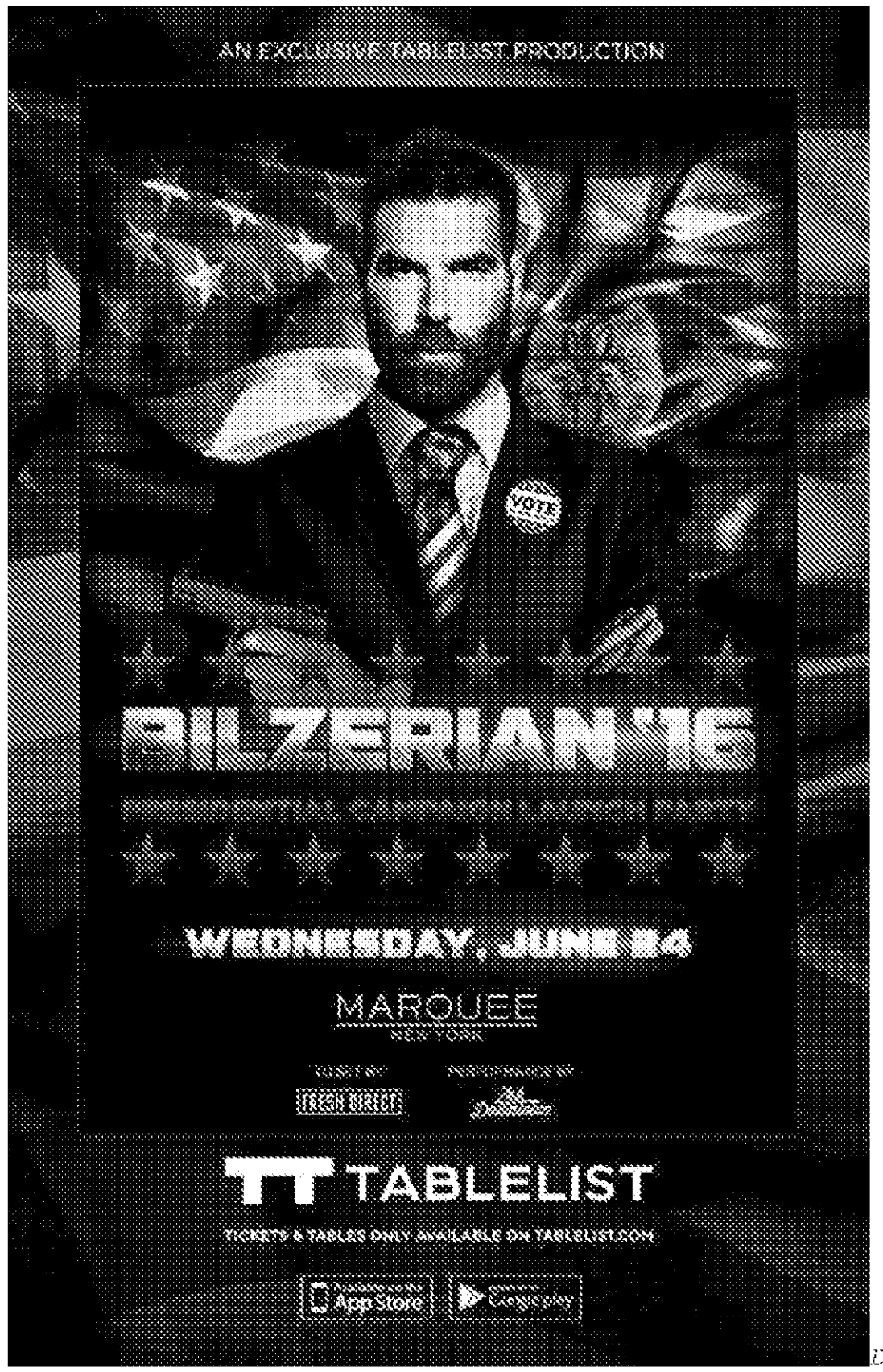
WILL HASKELL
JUN. 10, 2015, 5:30 PM

Dan Bilzerian is a millionaire, a self-proclaimed "sexual philanthropist," and a social media superstar with millions of Instagram followers.

Now, he's also a 2016 Presidential contender.

Well, maybe. On June 24th, he'll begin his "bid for the White House" by throwing a "Dan Bilzerian 2016" party at the Marquee, an exclusive nightclub in New York City.

Despite his devoted following of college-aged males, Blizerian's electoral prospects are pretty dismal. He loves a social media scandal (earlier this year he was kicked off Snapchat after posting a very NSFW video), and he loves bragging about his wealth; showing off stacks of money and luxe cars on his Instagram account.



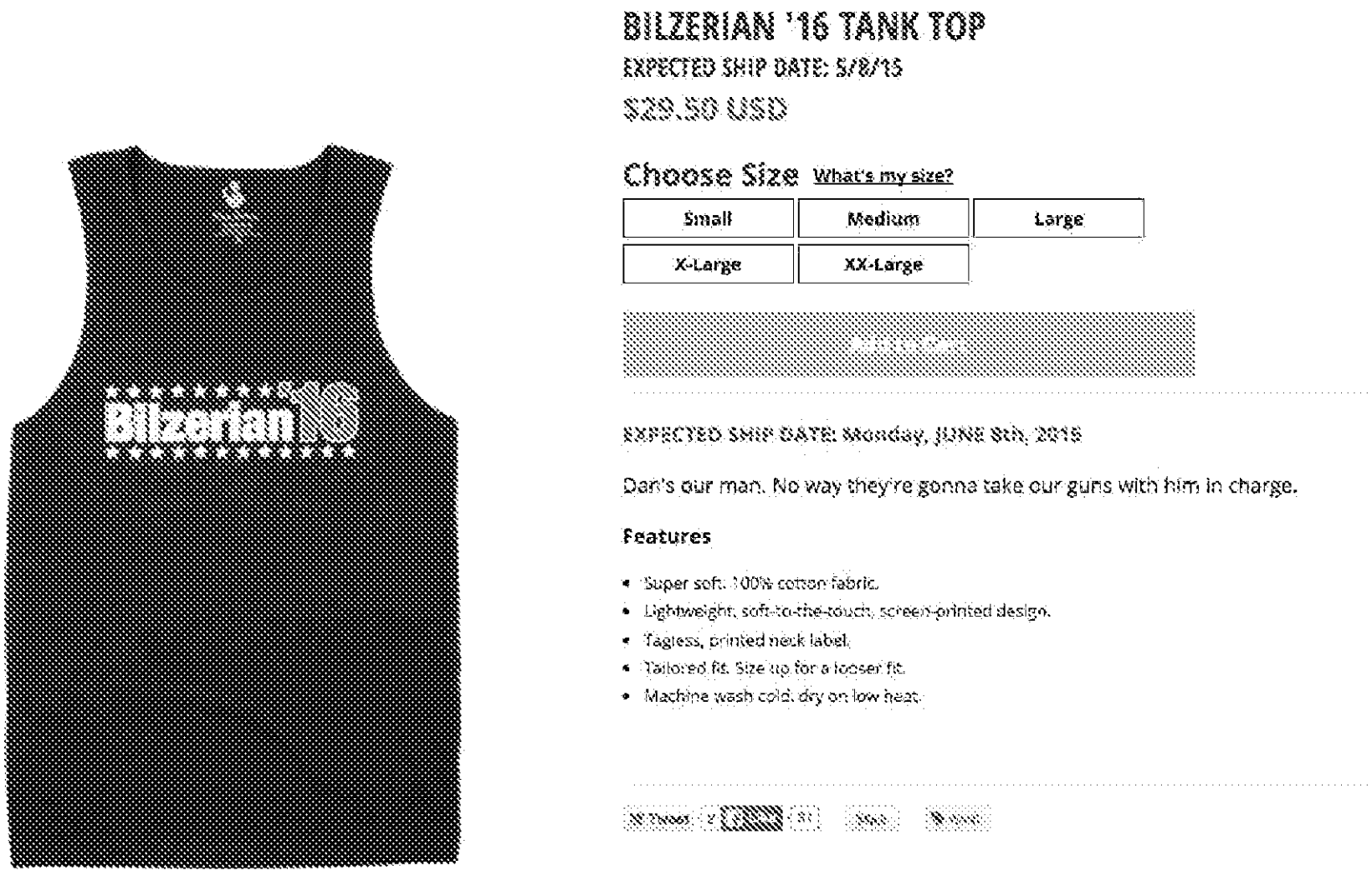
Dan Bilzerian

He also has been scolded for publicizing his irresponsible behavior with firearms (he was forced to make a PSA in retribution.) Last year, he was sued after throwing a naked porn actress off of a roof.

Bilzerian's kick-off party will likely blow the socks off of every other candidate's debut event (although, to be fair, Jeb Bush has yet to show us what he's got.)

The starting price for admission to the soiree is $40. Yes, it seems even Bilzerian has fallen victim to the scourge of money in politics.

Bilzerian campaign logo wear is available here. Differing slightly from Hillary Clinton's pantsuit tees, the Bilzerian '16 team is offering tank tops and tee-shirts.



Dan Bilzerian

This past Christmas, Bilzerian uploaded a photo with Congressman Dana Rohrabacher (R-CA). It's unclear if Rohrabacher will endorse Bilzerian's campaign. It's also unclear if the Congressman endorses the party boy lifestyle for which Bilzerian is famous.

danbilzerian • 9 months ago

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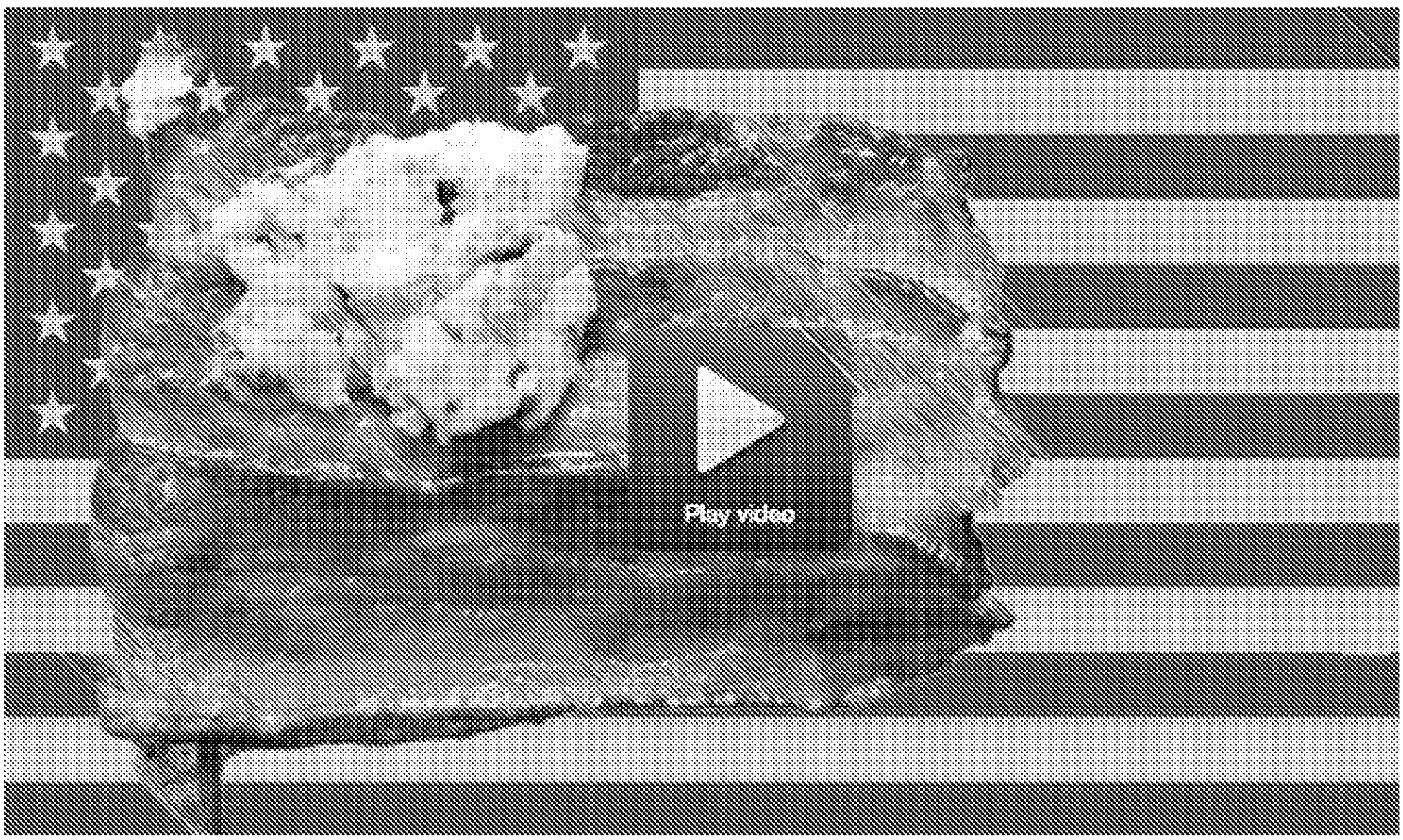
At a time when Voldemort is polling ahead of many Republican candidates, nothing is truly impossible.

NOW WATCH: How To Make An American Flag Out Of Bacon

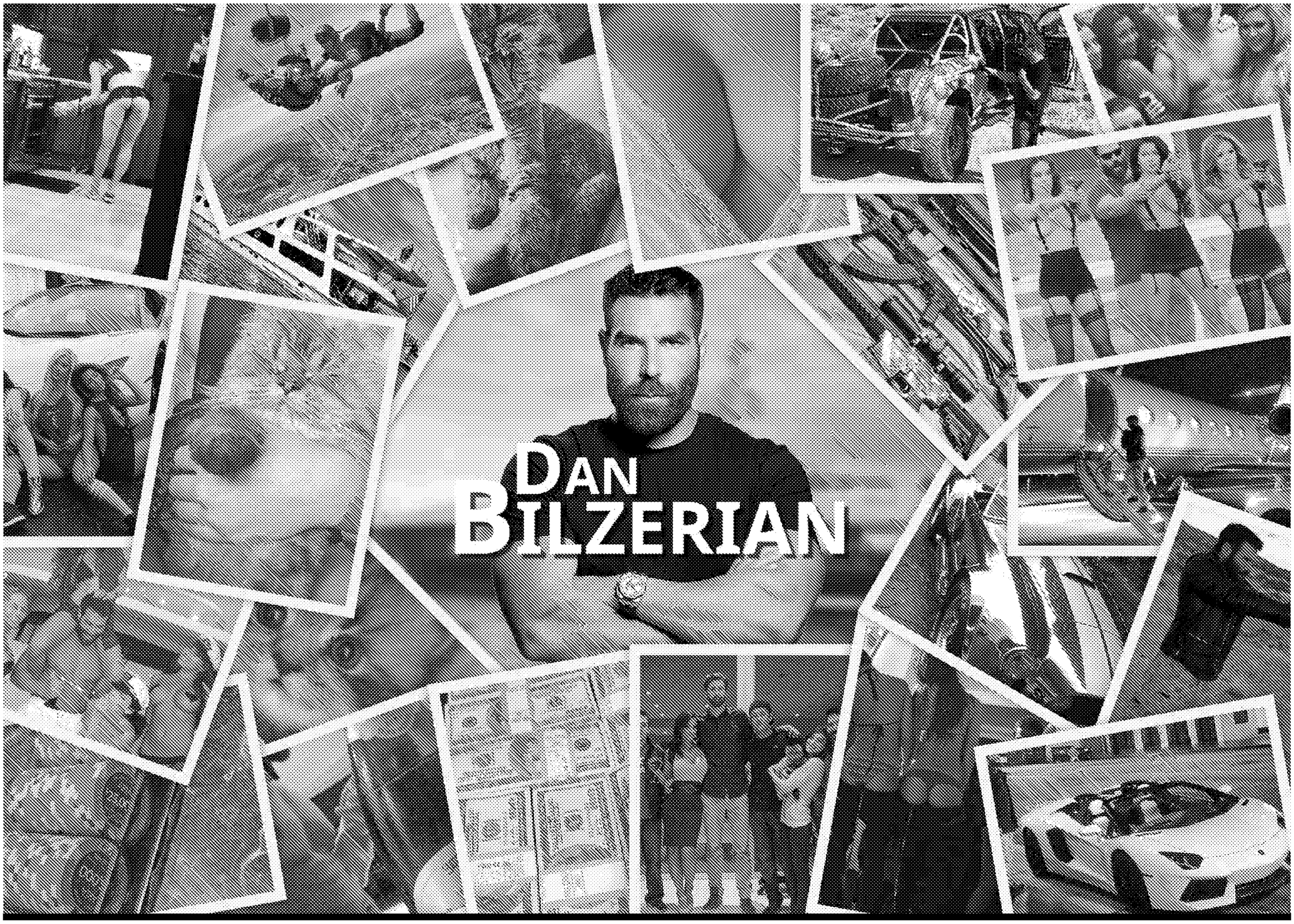


More: Inspirational, Kings of Instagram, Dan Bilzerian

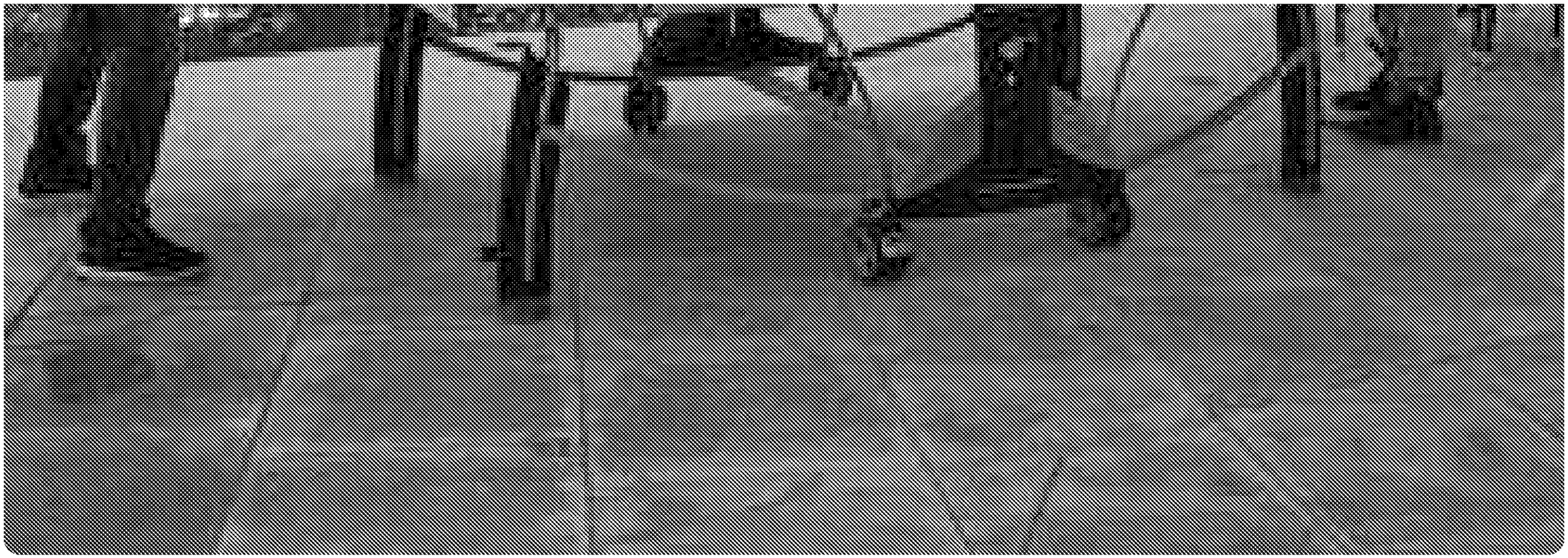
EXHIBIT 8

<danbilzerian.com>

Homepage


DAN
BILZERIAN

INSTAGRAM



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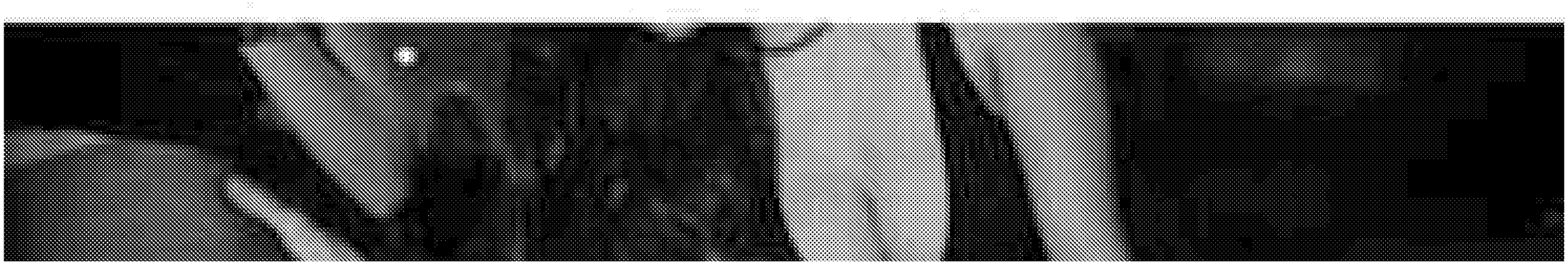

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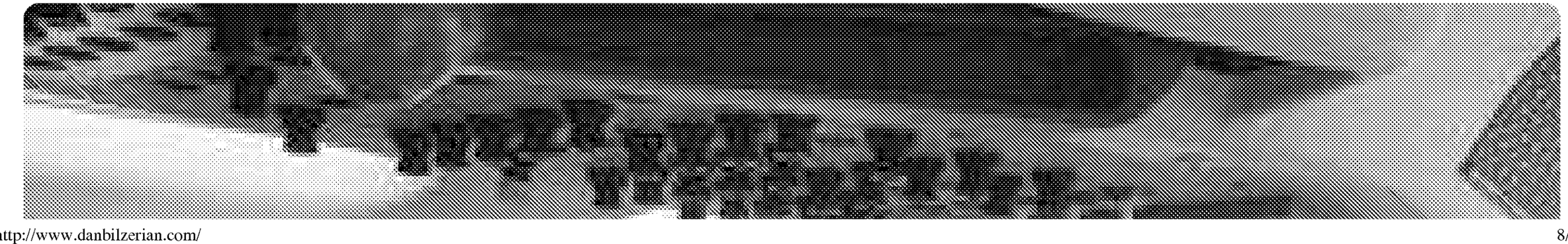

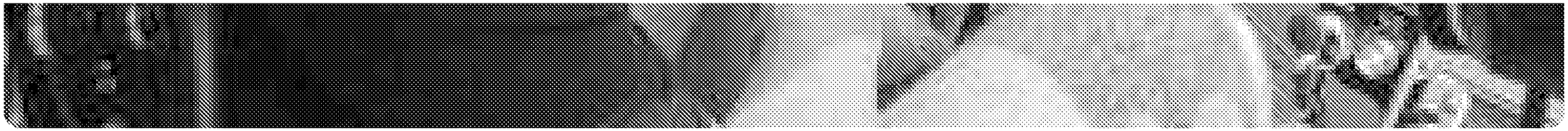

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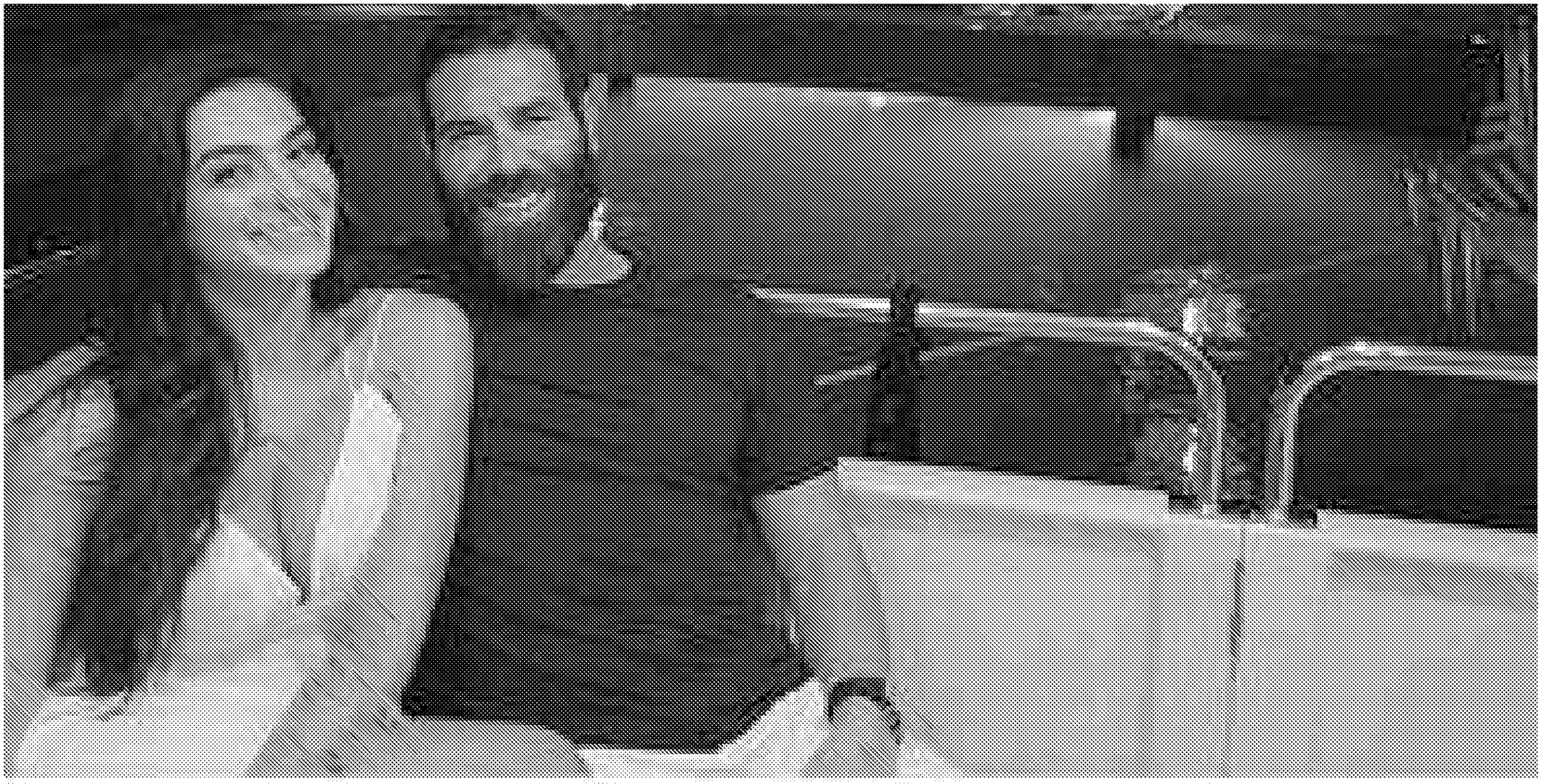

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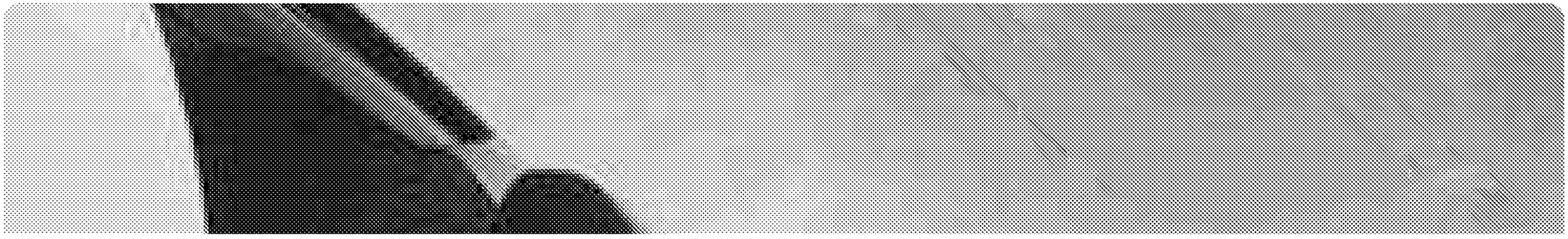

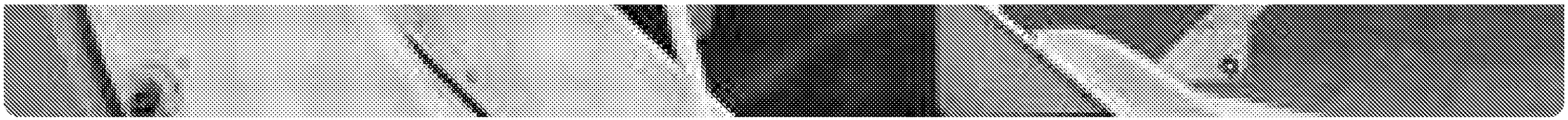

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BuzzFeed

(http://www.buzzfeed.com/mrloganrhoades/this-millionaire-playboy-is-the-most-interesting-man-on-inst)

(http://www.huffingtonpost.co.uk/2014/05/14/dan-bilzerians-naked-girls-guns-goats-instagram-poker-billionaire-pictures_n_5323895.html)

BroBible

(http://www.brobible.com/life/article/dan-bilzerian-two-heart-attacks/)

GAWKER

(http://gawker.com/dan-bilzerians-lawyer-responds-to-the-porn-star-he-thre-1576855124)

Luxury & Fine Living

(http://www.ealuxe.com/who-is-dan-bilzerian/)

(http://guardianlv.com/2014/03/dan-bilzerian-playboy-king-is-bruce-wayne-embodied/)

(http://www.flushdraw.net/news/why-is-the-poker-community-going-crazy-over-danbilzerian/)

(http://www.mensxp.com/technology/web-and-social/22691-dan-bilzerian-instagrams-playboy-and-the-worlds-coolest-man.html)

(http://www.therichest.com/celebnetworth/celeb/richest-poker-players-celeb/dan-bilzerian-net-worth/)

(http://www.totalprosports.com/2014/05/13/dan-bilzerian-tells-story-heart-attack-viagara-cocaine-sex-video/)

(https://autos.yahoo.com/news/dan-bilzerian-shoots-guns-drives-tanks-surrounds-himself-130013048.html)

(http://blazepress.com/2014/03/look-life-dan-bilzerian-one-successful-poker-players-ever/)

(http://www.nydailynews.com/news/national/poker-

playing-bad-boy-suffered-3-heart-failures-article-1.1535828)

(http://www.complex.com/style/2014/04/dan-bilzerian-interview)

(http://www.dailydot.com/lifestyle/dan-bilzerian-instagram-interview/)

RantLifestyle

(http://www.rantlifestyle.com/2014/03/28/dan-bilzerian-interesting-man-world/)

(http://www.dailystar.co.uk/showbiz/377073/Instagram-lad-Dan-Bilzerian-reveals-poker-drugs-and-pornstars-gave-him-TWO-heart-attacks)

(http://www.theladbible.com/articles/dan-bilzerian-s-lawyers-sue-the-woman-he-threw-off-a-roof)

(http://www.barstoolsports.com/dmv/super-page/dan-bilzerians-lawyer-sent-a-fantastic-letter-to-the-lawyer-of-the-porn-star-he-

threw-off-his-roof-who-is-now-trying-to-sue-him-for-85k/)

ALL IN (http://www.allinmag.com/media-gallery/videos/2014/04/17/20/21/off%20the%20felt%20with%20dan%20bilzerian%20episode%201)

INTERNATIONAL BUSINESS TIMES (http://au.ibtimes.com/articles/545279/20140327/instagram-playboy-dan-bilzerian-poker-win-10.htm#.U8ryYl1dV5z)

777.com (http://www.777.com/poker-games/dan-bilzerian-man-who-makes-poker-interesting)

CARBON POKER (http://www.carbonpoker.ag/blog/dan-bilzerian-50-million-poker-25/)

(http://four-pins.com/life/ridiculous-non-stop-flexing-dan-bilzerian/?utm_campaign=complexmag+socialflow+03+2014&utm_source=facebook&utm_medium=social)

autoevolution

(http://www.autoevolution.com/news/american-poker-player-owns-incredible-car-collection-photo-gallery-77559.html#sjmp)

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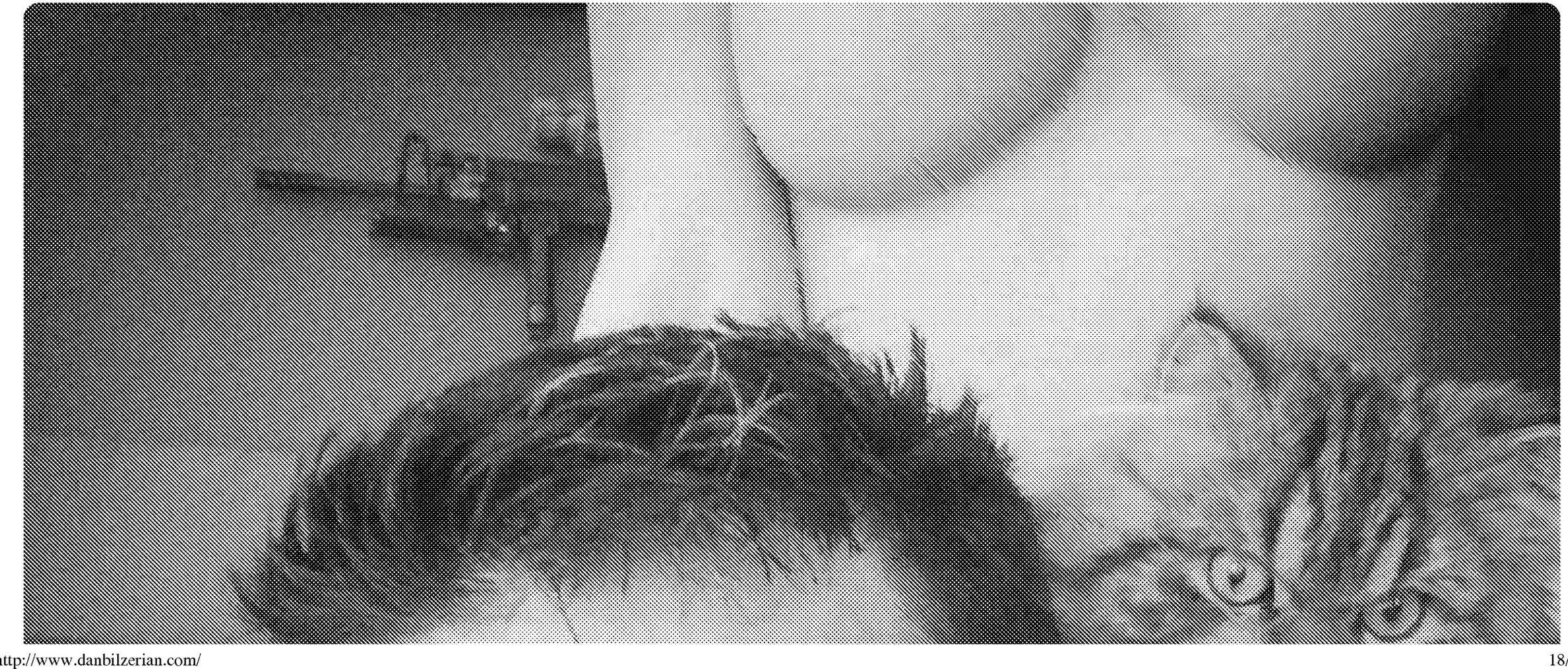
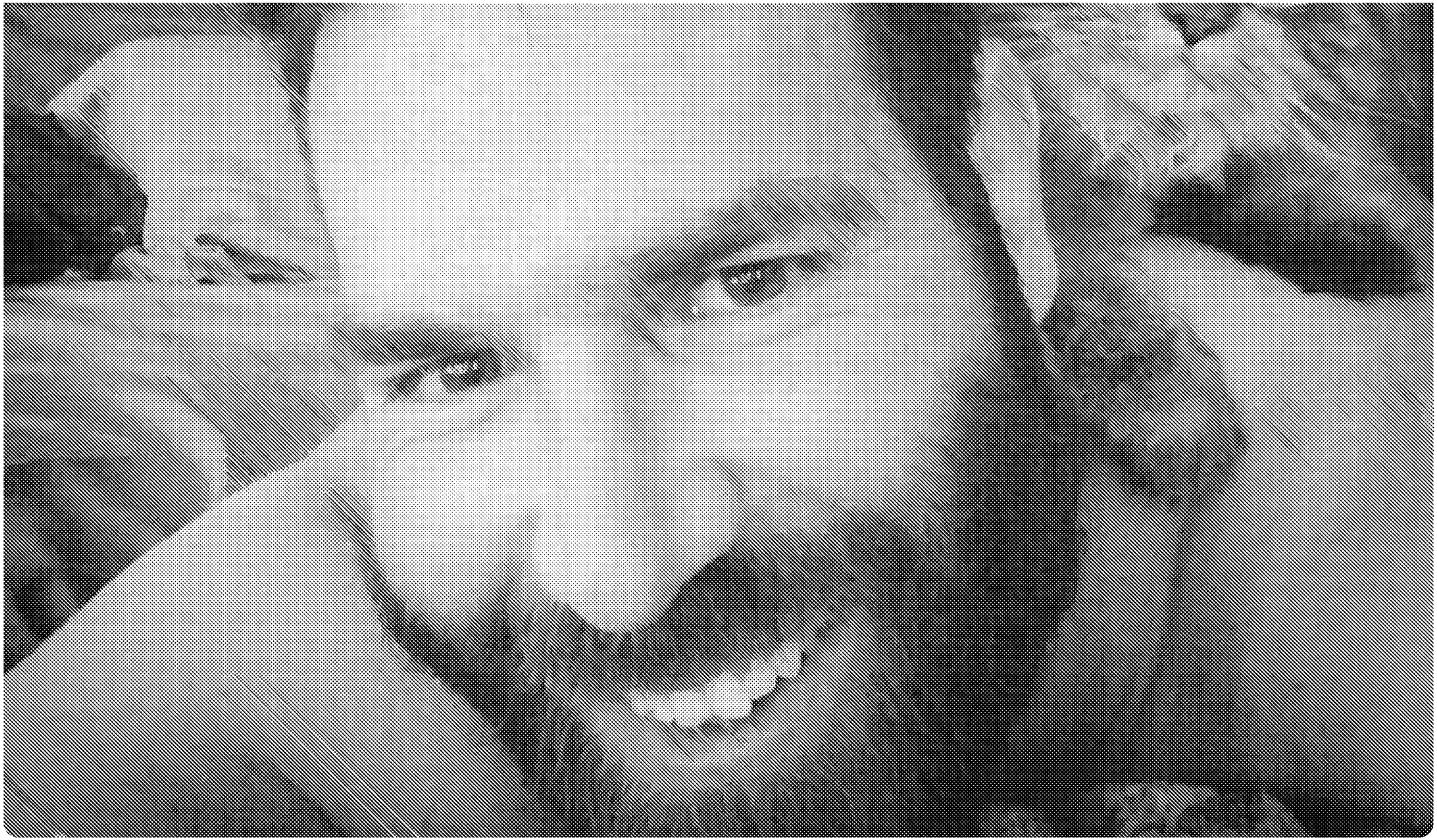
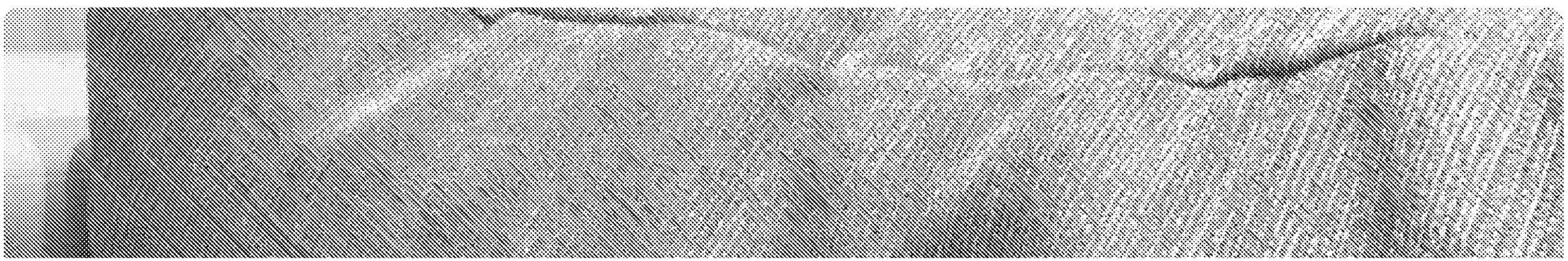




MILLIONAIRE / PLAYBOY / POKER PLAYER SEXUAL PHILANTHROPIST



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POSTED BY @DANBILZERIAN (HTTPS://TWITTER.COM/DANBILZERIAN)

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EXHIBIT 9

Jay Hatahway,
Dan Bilzerian's Lawyer Responds to the
Porn Star He Threw off the Roof,
GAWKER (May 15, 2014)

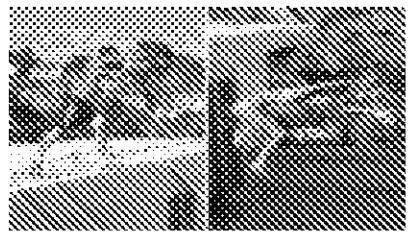
GAWKER

Dan Bilzerian's Lawyer Responds to the Porn Star He Threw off the Roof

Jay Hathaway

Filed to: FOLLOW UPS 5/15/14 1:00pm

Millionaire playboy and Instagram celebrity Dan Bilzerian is best known of late for chucking a 90-pound porn star, Janice Griffith, off his mansion roof during a shoot for *Hustler*, and missing the pool. Griffith threatened to sue, and now Bilzerian's lawyer has purportedly written the snarkiest response Bilzerian's money could buy.



Instagram Playboy Throws Naked Porn Star Off His Roof, Misses the Pool

Dan Bilzerian, the king of Instagram, is known for a few things: playing high-stakes poker, buying...

Bro-news site Total Frat Move claims to have exclusively obtained the letter. Someone on Bilzerian's team confirmed to Gawker that it's authentic.

In response to Griffith's request for $85,000 in compensation for the work she missed as a result of a broken foot, the attorney counters that she consented to be thrown off the roof as part of the shoot, and points out that she had been warned not to grab Bilzerian's shirt before the throw took place.

Except that he didn't exactly say it that way:

> "Maybe your client's theory is that Mr. Bilzerian negligently violated the established standard of reasonable care for one who throws a porn actor off a roof into a pool during a photo shoot for an adult magazine. I'll let that one sink in for a minute."

After going off on a tangent to porn-star shame Griffith for using hashtags like #deepthroat and #fatpussies, the lawyer returns to business with a closing that sounds like self-described asshole Dan Bilzerian could have written it himself:

> "If she sues, the complaint will be sanctionably frivolous. Your client should just box up almost every last bit of her property (please exclude all videos and photographs, as well as the seemingly inevitable small yappy dog) and drop it off with you in safe keeping for Mr. Bilzerian. After he receives the judgment in his favor, he will have it all delivered to him. Then he will probably blow it up with a mortar in the desert.
>
> I enjoyed our brief correspondence."

It's implied here that Griffith intends to sue Hustler, but whether this letter blusters her out of adding Bilzerian to the lawsuit remains to be seen.

The full letter is below.

[*H/T TFM*]

Jay Hathaway's Discussions All replies

Max Read › Jay Hathaway
5/15/14 1:06pm

It is extremely surprising to me that Dan Bilzerian's lawyer is

it is extremely surprising to me that Dan Blizerian's lawyer is a prick.

200

Reply 8 replies

Gabrielle Bluestone › Jay Hathaway
5/16/14 8:36am

WCL alums! YEAH!

Reply

Jay Hathaway › Jay Hathaway
5/15/14 1:12pm

I asked Janice Griffith to respond on Twitter.

Reply 3 replies

Hatless Süspęçt › Jay Hathaway
5/15/14 1:31pm

Thanks...for the update? I guess.

6

Reply

Jay Hathaway › Hatless Süspęçt
5/15/14 1:35pm

Oh, these comments post to Kinja when we Twitter-invite someone to the conversation. It's just to give them a thread to comment on.

2

Reply

Hatless Süspęçt › Jay Hathaway
5/15/14 1:37pm

Ahhhh. I was wondering - it was just too random.

2

Reply

EXHIBIT 10

Philip Caulfield,
'Instagram Playboy' Dan Bilzerian
arrested at Los Angeles airport days
after alleged model-kicking incident,
NEW YORK DAILY NEWS (Dec. 10, 2014)

‘Instagram playboy’ Dan Bilzerian arrested at Los Angeles airport days after alleged model-kicking incident

Bilzerian, the social media provocateur famous for posting photos of nude models and guns, was busted at LAX on Tuesday night on an out-of-state warrant.

BY PHILIP CAULFIELD / NEW YORK DAILY NEWS / Wednesday, December 10, 2014, 11:54 AM

A A A

2K 37 2

SHARE THIS URL

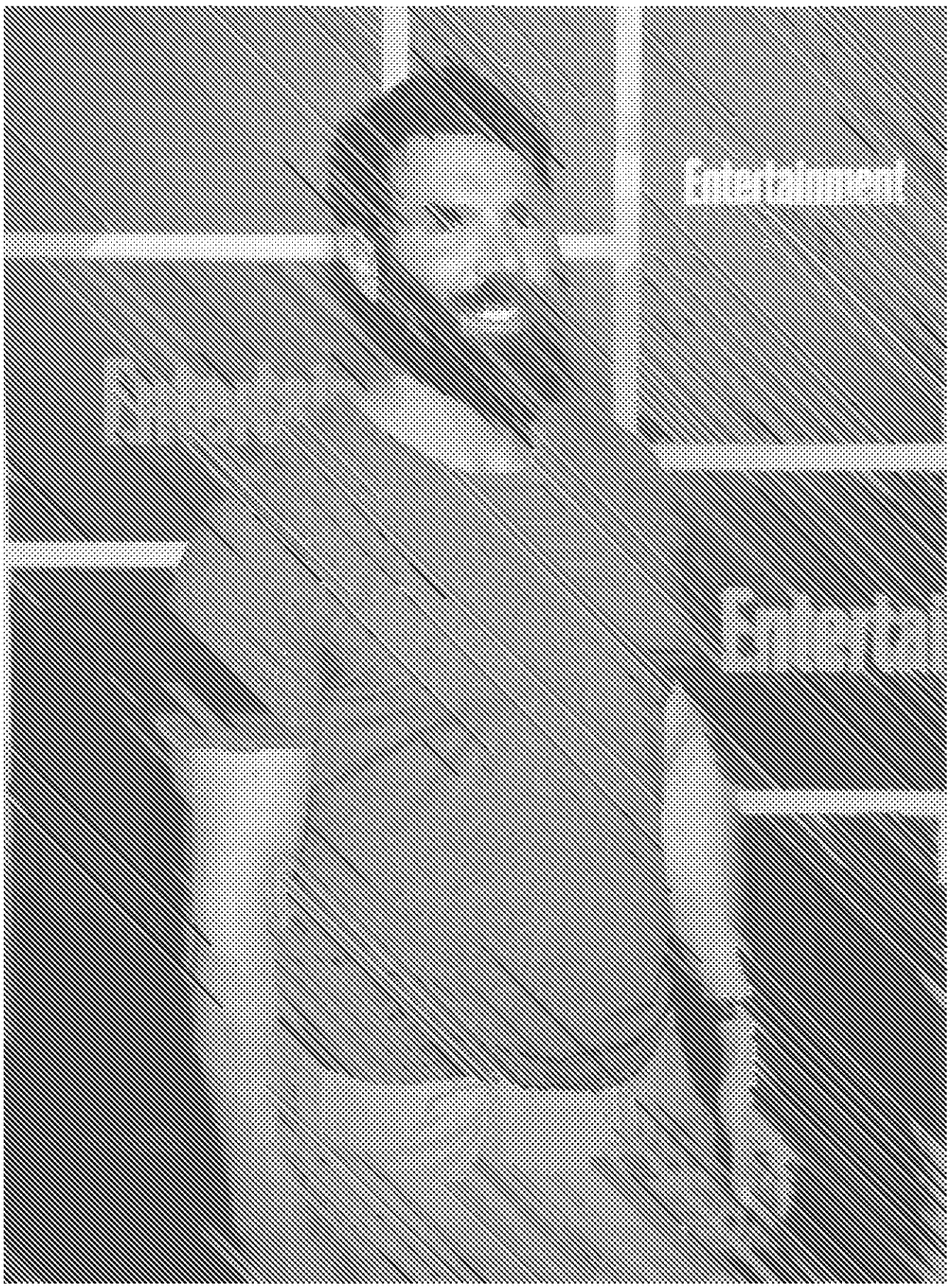
nydn.us/1z6Sbt8

The gun-toting, millionaire bad boy of Instagram is having a rotten week.

Poker champ and trust fund jet-setter Dan Bilzerian was arrested in Los Angeles Tuesday on an out-of-state warrant, sheriff's officials said.

According to TMZ, authorities in Clark County, Nev., were after Bilzerian for trying to build a bomb using materials found in TNT.

The warrant, which the site said was for "possessing an explosive with the intent to manufacture," was issued last



ETHAN MILLER/GETTY IMAGES

Dan Bilzerian, above in San Diego in July, was arrested at LAX airport on Tuesday, sheriff's officials said.

month, but cops kept it under wraps until catching up with the 34-year-old at Los Angeles International Airport after his plane landed on Tuesday night.

He was booked at the LAPD Pacific Division at 10:15 p.m. and was being held without bail, according to the sheriff's department.

The bust comes just days after a model claimed the buff, bearded former Navy SEAL wannabe kicked her in the face at a Miami nightclub.

Brunette beauty Vanessa Castano told police Bilzerian booted her in the kisser at LIV nightclub on Saturday night while trying to pull another girl up on a platform with him.

Bilzerian split before police arrived, TMZ said, though local reports said Castano was considering filing a lawsuit.

She told the gossip website The Dirty she was trying to break up a fight between two women when Bilzerian struck.

"There were two girls standing next to me at the table that were fighting. People started getting shoved and I tried to separate them," she told the site.

"Then Dan pushed me both off the banquette and once I fell he kicked me in the face."

"I wanted to file a police report and EMT checked my face I was bleeding from my eye but I felt fine and at that point I just wanted to go home," she said

"I really didn't see how serious it was until I watched the video for myself. I'm

lucky that the injuries weren't worse."

Castano said she was "gonna go ahead pursue legal action against him."

Bilzerian told a different story in a now-deleted Instagram post.

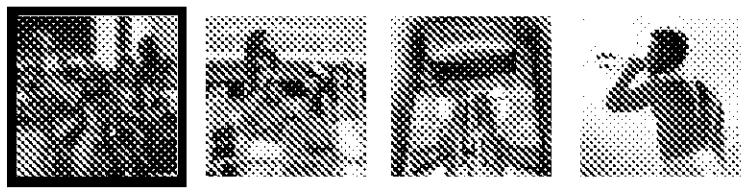
"Actually 2 girls attacked a girl I was with to the point they gave her a black eye and threw her off a table and went after her, b/c they wanted to get closer to me," he wrote in a post to his 5.7 million followers.

LIV told TMZ Bilzerian is banned from coming back to the club.

Earlier this year, Bilzerian made a splash in the media for tossing a naked porn star off a roof and into a pool.

The 19-year-old woman broke her foot in the stunt, which was being shot for a spread in Hustler magazine, and later sought $85,000 in compensation from Bilzerian.

His lawyer shot down the request.



DAN BILZERIAN VIA INSTAGRAM

Multimillionaire poker star Dan Bilzerian (c.) with a bevy of beauties.

LIVELEAK

Bilzerian landed in hot water earlier this year after he tossed a naked porn star into a pool off the roof a Hollywood Hills mansion. The woman broke her foot and later sought $85,000 in compensation.

Video: Naked porn

TAGS: entertainment news

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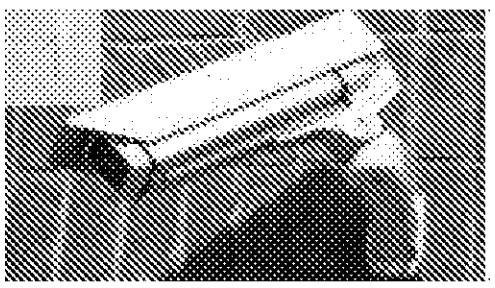

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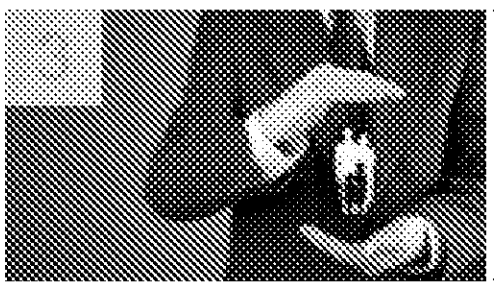

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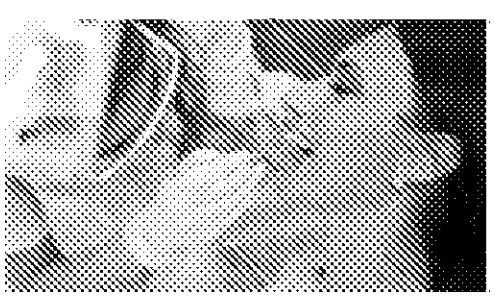

Best Dental Health Plans

COMMENTS (2) [Discussion Guidelines]

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Write a comment

SORT

CHRIS WATSON 4

303 days ago

and we should care about this clown because???????????

Like REPLY SHARE

BECK FAN 0

301 days ago

The RICHER they get, the more MISERABLE they are.

Like REPLY SHARE

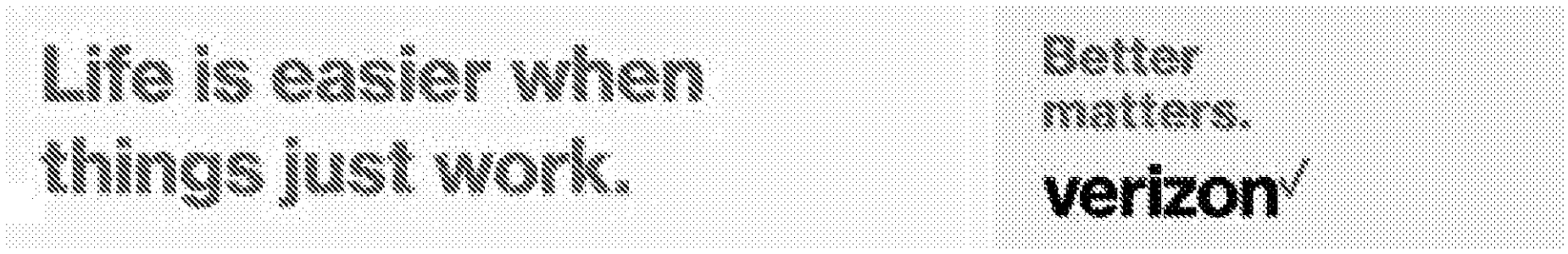

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EXHIBIT 11

Dan Bilzerian '16 Presidential Campaign Launch Party,
HUFFINGTON POST (Jun. 9, 2015)

October 9, 2015

- 1.

Featuring fresh takes and real-time analysis from HuffPost's signature lineup of contributors

HOT ON THE BLOG

Robert Reich | Greta Van Susteren

Chelsea Manning | Henry Louis Gates, Jr.

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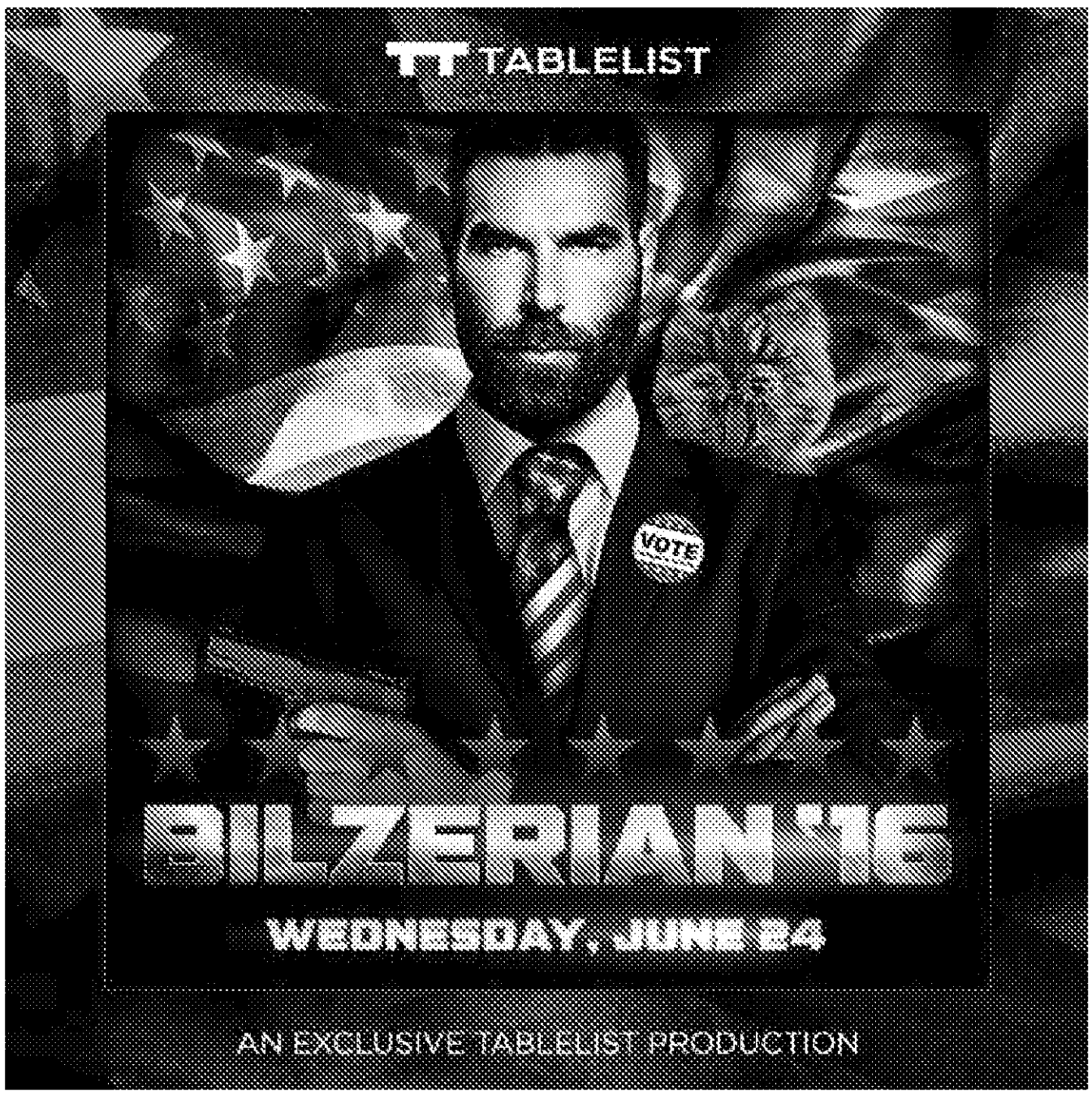
PartyEarth.com

Dan Bilzerian '16 Presidential Campaign Launch Party

Posted: 06/09/2015 9:13 am EDT | Updated: 06/09/2015 10:59 am EDT



Campaign season is an exciting, somewhat absurd time in our country, with its lies, muckraking, heated debates and smear ads:

"...once voted to cut teacher salaries in half"

"...said on record that he doesn't like the lower class"

or the old classic "... recently threw a naked porn star off of his roof."

Hold on, what's that last one?

That's right. Dan Bilzerian - gambler, social media mogul "sexual philanthropist," and playboy millionaire - has announced his presidential bid for 2016. He is kicking off the campaign trail on June 24, 2015 at Marquee, an exclusive NYC nightclub, complete with "models on deck" for what will likely be the most depraved campaign celebration in the history of this great nation.

To get an idea of Bilzerian's positions on hot button issues like women's rights, gun control, cats and economics, look no further than the presidential hopeful's Instagram account:

danbilzerian • 5 months ago

Follow

One thing is for sure: Bilzerian is unlikely to be accused of hiding anything, considering there isn't much left for him to reveal.
Tickets are available for this celebration of excess and democracy in America through Tablelist and if Bilzerian's social media posts are any indication of what's in store, it'll get rowdy.

This article by Party Earth.

Click here to get the inside scoop on the best concerts, festivals, parties, and more in your city every weekend!

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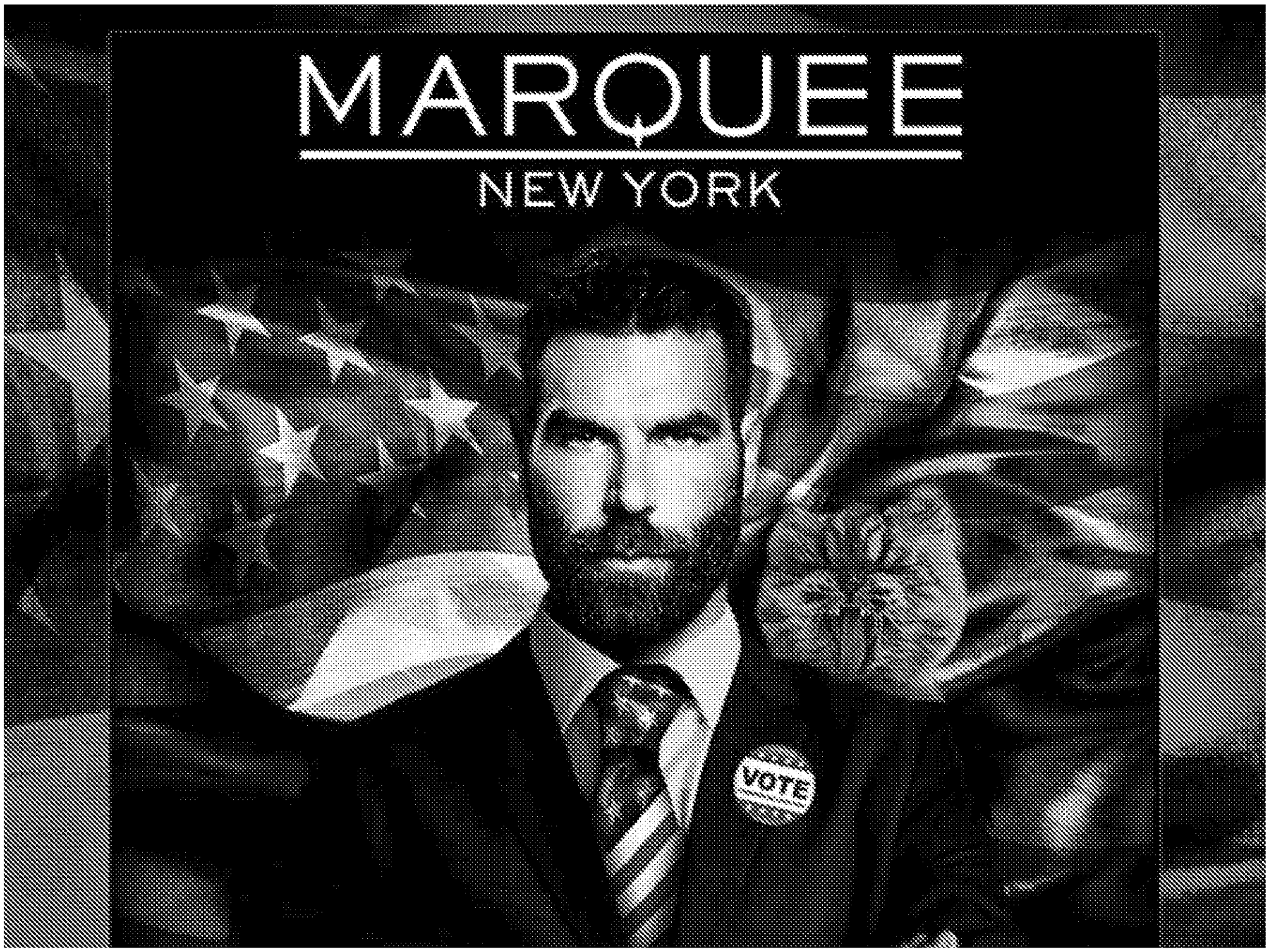
EXHIBIT 12

Molly Mulshine,
The notorious 'King of Instagram' threw a raunchy presidential campaign launch party and I had a front row seat,
BUSINESS INSIDER (Jun. 25, 2015)

BUSINESS INSIDER

The notorious 'King of Instagram' threw a raunchy presidential campaign launch party and I had a front row seat

MOLLY MULSHINE
JUN. 25, 2015, 4:55 PM



Dan Bilzerian

The last time we heard of a party thrown by Dan Bilzerian, it included giraffes, mermaids, and cameo appearances from Vin Diesel and Ludacris.

So when we found out Bilzerian was visiting New York City to host a party in support of his 2016 presidential campaign, we snapped up a ticket immediately.

Known as the "King of Instagram," the controversial Bilzerian has 10 million followers on the platform. His photos, full of guns, money, and models, have earned the professional poker player online infamy and even a profile in GQ.

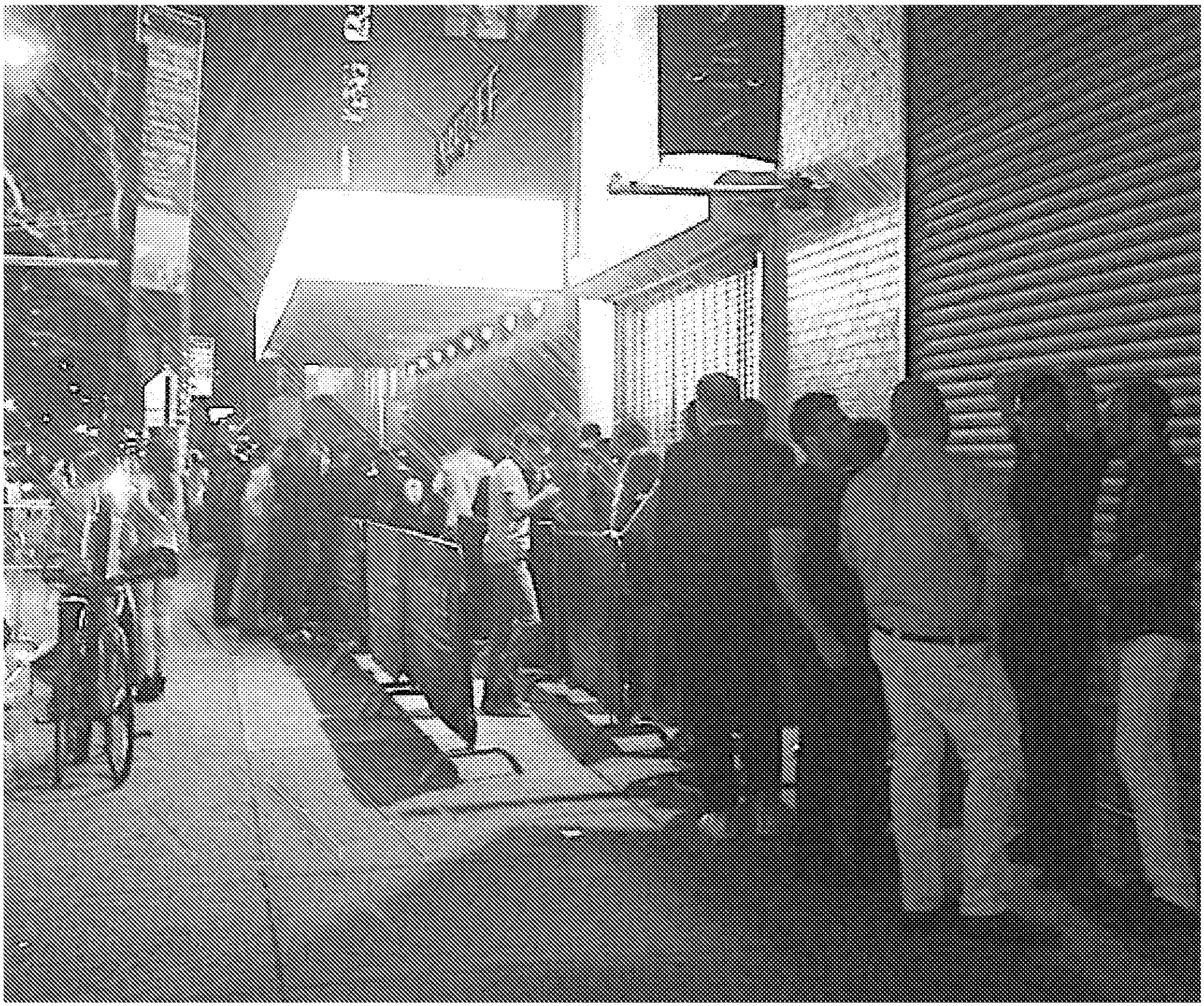
Now, the Rand Paul poker pal says he's running for president. The party held last night at the Marquee is the first stop on a multicity campaign tour. Bilzerian is hitting Boston tonight.

But as it turned out, the event wasn't all that different from a typical night at the club. Aside from the American flag-themed decor, of course.

Scroll through to see what his party last night was like.

View As: One Page Slides

Guys in button-down shirts and suits started lining up outside Marquee at 11:15 p.m.



Business Insider/Molly Mulshine

Inside, the bro fest continued. I asked one guy if he thought some girls might arrive later. "Hopefully," he said.

Business Insider/Molly Mulshine

I finally found a big group of women in the corner. They told me they came in with a promoter.

Business Insider/Molly Mulshine

More: Innovation Digital Culture Dan Bilzerian Instagram Party Features

EXHIBIT 13

<thedirty.com>

Article

FAKE EQUIS

UPDATE: DAN BILZERIAN GAVE ME CHLAMYDIA

FAKE EQUIS August 10th, 2015 at 2:01 PM

THE DIRTY ARMY: Nik, a few weeks ago I met Dan Bilzerian at Marquee nightclub in New York when he was doing his presidential campaign. There was three of us who went back to his hotel room with his other girls Rosie and Megan. I ended up getting super drunk and sleeping with Dan. I got tested two weeks later and lucky me I found out he gave me chlamydia. I'm asking that any other girls out there that have slept with Dan go get tested!!!!

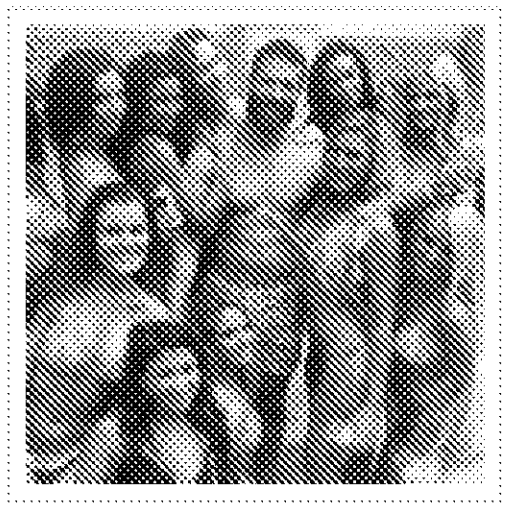
Presidential campaigns are never easy.- nik

***UPDATE via TMZ:** Dan Bilzerian Sues Website I Don't Have Any STDs!!!

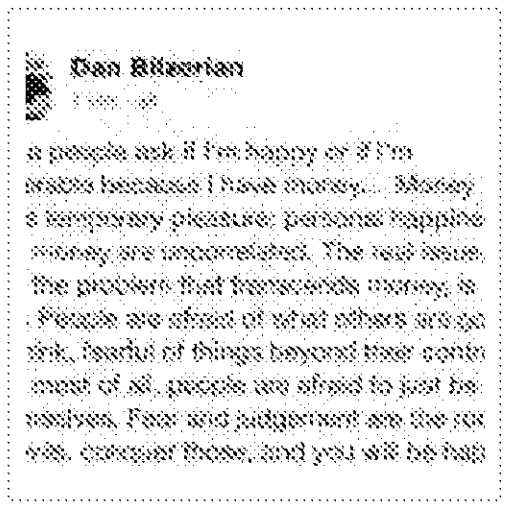
221 362 COMMENTS FAKE EQUIS

FAKE EQUIS POSTS

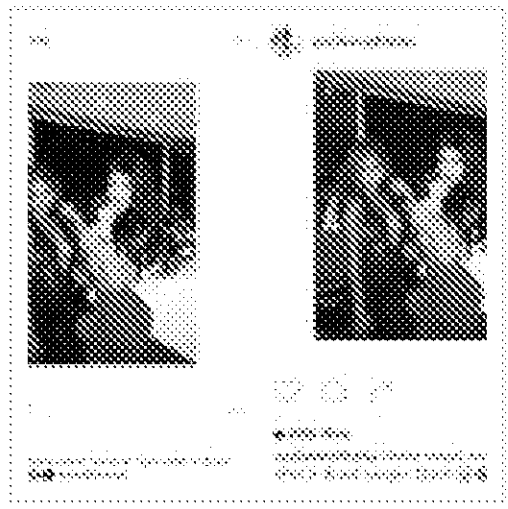
VIEW MORE



OPEN LETTER TO DAN BILZERIAN

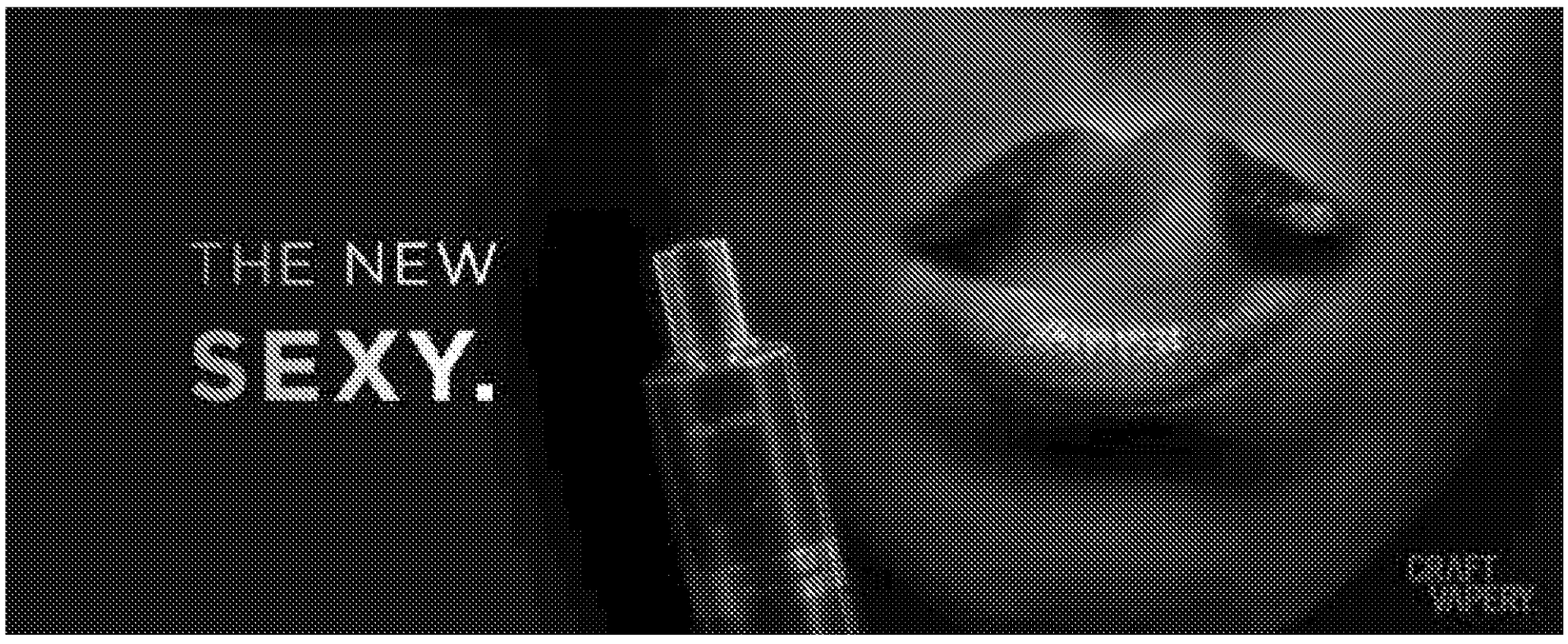


DAN BILZERIAN'S PHILOSOPHY SOUNDS FAKE



DAN BILZERIAN HAS ACQUIRED A TASTE FOR TRANSGENDERS

FAKE EQUIS' NEW GIRLFRIEND



Featured Comment

Nik Richie Dirty Team · 2 months ago

FYI -- I removed the last post about Dan Bilzerian purchasing a table at Electric Zoo for 650k because it was FAKE. Dan wants people to believe he has money. I had a feeling so I made some calls. Self posts suck. I apologize.- nik

362 Comments The Dirty Login

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Nik Richie Dirty Team · 2 months ago

Featured by The Dirty

FYI --- I removed the last post about Dan Bilzerian purchasing a table at Electric Zoo for 650k because it was FAKE. Dan wants people to believe he has money. I had a feeling so I made some calls. Self posts suck. I apologize.- nik

88 ^ v · Reply · Share ›

Pixel → Nik Richie · 2 months ago

DA Inspiring Change Improving Lives

87 ^ v · Reply · Share ›

ArmaniPrprincess → Pixel · 2 months ago

Whaaaaat? Who made this? I love it. Someone in the DA with some real Graphic Design skills, hell yeah.

14 ^ v · Reply · Share ›

Pixel → ArmaniPrincess · 2 months ago

Thank you, I made it. :) So many self posts lately, it became more and more necessary haha

31 ^ v · Reply · Share ›

ArmaniPrincess → Pixel · 2 months ago

I mean you got in the perspective of the hands, replicated the Ad

Council logo perfectly, even gave the girl some eyes peeking over the top, color me impressed!

12 ^ v · Reply · Share ›

Phil Perrier ➔ Pixel · 2 months ago

Awesome work!

7 ^ v · Reply · Share ›

Pixel ➔ Phil Perrier · 2 months ago

Thanks! Designing stuff for the site keeps me on my toes haha because the conversations move so quickly.

17 ^ v · Reply · Share ›

Nisiek ➔ Pixel · 2 months ago

you are truly talented too talented for us mere DA.

3 ^ v · Reply · Share ›

Pixel ➔ Nisiek · 2 months ago

Thank you, to be honest I didn't draw the people with the phones lol found it on a free vector stock site. I love the Internet haha

7 ^ v · Reply · Share ›

Phil Perrier ➔ Pixel · 2 months ago

I might be able to add a couple of fun ones, just not from work would have to do it from home

2 ^ v · Reply · Share ›

Pixel ➔ Phil Perrier · 2 months ago

Can't wait, the more the merrier! :)

2 ^ v · Reply · Share ›

dawndavenport ➔ Pixel · 2 months ago

Girl, can you Photoshop like...FE face on WT body? Stuff like that? I've always wanted to sit down and do stuff like that but I'd get too carried away... Like sid from toy story

11 ^ v · Reply · Share ›

Pixel ➔ dawndavenport · 2 months ago

I will SO do that. Might take me a bit longer than Sluts R Us though haha

6 ^ v · Reply · Share ›

dawndavenport ➔ Pixel · 2 months ago

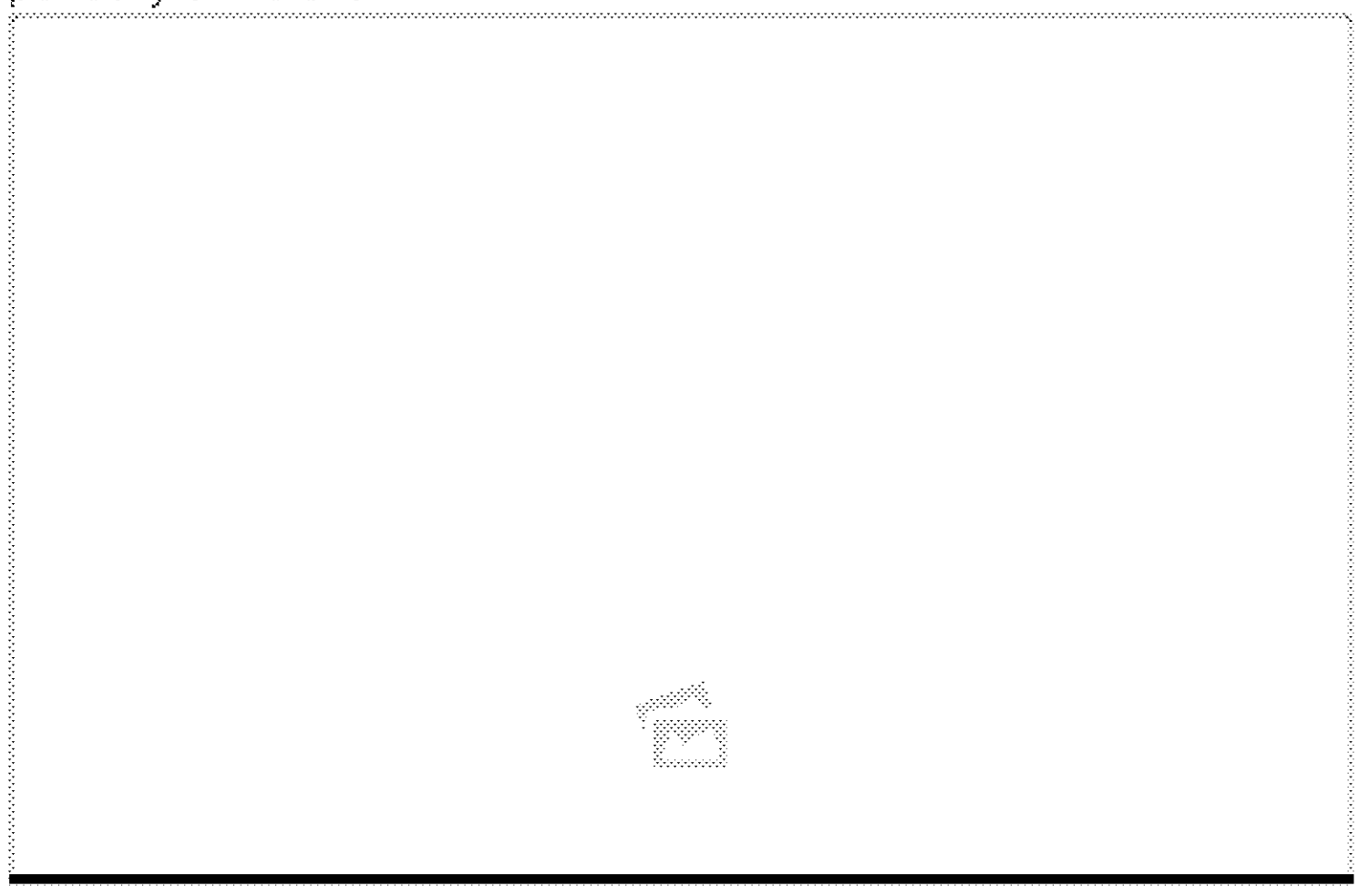
Omg shit like that makes me laugh so hard! When my daughter was a kid I thought birds with arms was hilarious - she thought I was "ohev" I

will love whatever u come up with!

3 ^ v · Reply · Share ›

Pixel ➔ dawndavenport · 2 months ago

Ladies and Gentlemen, I give you....Wicked Equis. I wish I had picked a better quality photo of him :(But the odd thing is, his face fit almost perfectly on hers lol



See more

30 ^ v · Reply · Share ›

ArmaniPrincess ➔ Pixel · 2 months ago

HAHAHAHAHA. Thank you, i so desperately needed that in my life, and i didn't even know i did.

11 ^ v · Reply · Share ›

Pixel ➔ ArmaniPrincess · 2 months ago

So glad I could help! :)

3 ^ v · Reply · Share ›

dr.avery ➔ Pixel · 2 months ago

You're amazing

1 ^ v · Reply · Share ›

miss piglet ➔ Pixel · 2 months ago

That is awesome! You've out done yourself!!

7 ^ v · Reply · Share ›

Pixel ➔ miss piglet · 2 months ago

Thank you! I would love to do a Dirty Army poster, for those of us who

actually show our faces ;) I'll put our faces on an Avengers poster or something

7 · Reply · Share ›

miss piglet ➧ Pixel · 2 months ago

She-Ra esque.... for me please & thank you

7 · Reply · Share ›

Pixel ➧ miss piglet · 2 months ago

I dm'd you on twitter with an example, if you can send me a (decent quality) picture of your face at that angle, I'll make it happen! ;)

2 · Reply · Share ›

Kitty ➧ Pixel · 2 months ago

That's going to be so amazing.

2 · Reply · Share ›

miss piglet ➧ Pixel · 2 months ago

I'll get on it!!! I'll have you something by tomorrow! So excited

1 · Reply · Share ›

L. Mary Dagan-Föxman ➧ Pixel · 2 months ago

Can I send you a photo to use for that purpose of my face, please? I would really appreciate being included.

2 · Reply · Share ›

Pixel ➧ L. Mary Dagan-Föxman · 2 months ago

Absolutely! Let me figure out which poster I'm going to use and then you can send me a photo with your face at that angle

1 · Reply · Share ›

dawndavenport ➧ Pixel · 2 months ago

HAHAHAHA!!!! I freakin LOVE it! make some more! Youre awesome! You know how some days this site is just annoying AF? Not with your talent!

8 · Reply · Share ›

Pixel ➧ dawndavenport · 2 months ago

I'm so glad you love it! If people can think of more combos or other things besides what I see in comments, I will make it so! :)

4 ^ v · Reply · Share ›

Pixel ➔ Pixel · 2 months ago

It warms my heart to see people still upvoting and commenting on this. ☺ DA strong forever ever.

4 ^ v · Reply · Share ›

Kitty ➔ Pixel · 2 months ago

Someone needs to give you a medal of honour or something, because this is everything.

3 ^ v · Reply · Share ›

Luxe ➔ Pixel · 2 months ago

OMG, you Rock!

3 ^ v · Reply · Share ›

L. Mary Dagan-Föxman ➔ Pixel · 2 months ago

That is glorious!!!!!! Bravo!

2 ^ v · Reply · Share ›

beth blackheart ➔ Pixel · 2 months ago

what a lovely wicked midget! that made my night

1 ^ v · Reply · Share ›

Steve Buscemi ➔ Pixel · 2 months ago

Because they are the same height

1 ^ v · Reply · Share ›

Maia ➔ Pixel · 2 months ago

Sadly, both look better!

1 ^ v · Reply · Share ›

captain awesome ➔ Pixel · 2 months ago

Alright everyone. Gun to your head. Who'd you rather Wicked Equis or Caitlyn Jenner?

1 ^ v · Reply · Share ›

Pixel ➔ captain awesome · 2 months ago

Caitlyn Jenner all the way. Boobs and a d*ck, best of both worlds. Wicked Equis' face alone won't be earning that Caitlyn Jenner money.

1 ^ v · Reply · Share ›

o3mta3o ➔ captain awesome · 2 months ago

I'll take the gun

1 ^ v · Reply · Share ›

Heauxbag Pixel · 2 months ago

I died.

1 ^ v · Reply · Share ›

Uncle Chug Pixel · 2 months ago

I would have gone with Fake Tuna, but nicely done.

1 ^ v · Reply · Share ›

Snarkles Pixel · 2 months ago

Wow! I'm laughing so hard right now I'm crying. Photoshop battles, DA style. I'm afraid of what our imaginations may come up with..like Vegas Dave, as Chewy.

1 ^ v · Reply · Share ›

Kitty dawndavenport · 2 months ago

Thank you for requesting that photoshop edit.

It really made my Monday.

3 ^ v · Reply · Share ›

dr.avery Pixel · 2 months ago

They do move quickly, as much as the people we knock hate us; we are actually a group of witty, quick quipped, wisecrackin bunch of geniuses.
And humble.... Hahahah

1 ^ v · Reply · Share ›

dawndavenport Pixel · 2 months ago

Yaysssssss.

4 ^ v · Reply · Share ›

Nisiek dawndavenport · 2 months ago

holy shit, Nik hire this woman stat!!!

4 ^ v · Reply · Share ›

dr.avery Pixel · 2 months ago

Nicely done Pixel

1 ^ v · Reply · Share ›

Heauxbag Pixel · 2 months ago

So cool!!

1 ^ v · Reply · Share ›

Snarkles Pixel · 2 months ago

Well done. I really had a laugh aloud!

1 · Reply · Share ›

JD Dirty Team AmaniPrincess · 2 months ago

pixel got those design skills.

12 · Reply · Share ›

DirtyWhiteGirl Pixel · 2 months ago

It takes serious delusion and some big balls to self post

3 · Reply · Share ›

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192 comments • 7 hours ago

Avat King Ghidorah — SEX in the name is a good way to get 100+ followers a day.

Preparing For #JohnGray And The Shining's NRP Debut

149 comments • 16 hours ago

Avat Prince Nasir Ali Kalappa — When John Gray said this: https://www.facebook.com/photo... Almost everything he said was actually true, ...

The DA Ruined Fashion Week

120 comments • 3 hours ago

Avat Maggie — Those dresses are so trashy and ugly. Sloppy Joe looks fat and disgusting. The Office's tits look saggy as ever. Why would ...

Courtney Stodden Is So Foul

77 comments • 6 hours ago

Avat Maggie — I can see her nipples and they're pointing in completely different directions. Is anyone else seeing this?

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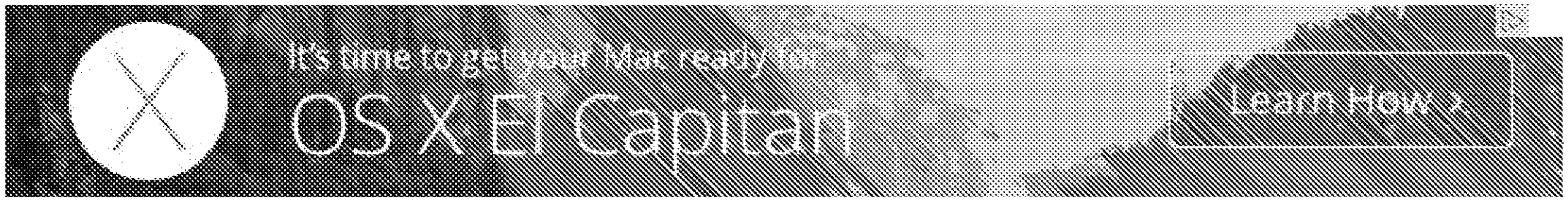
EXHIBIT 14

<tmz.com>

Article



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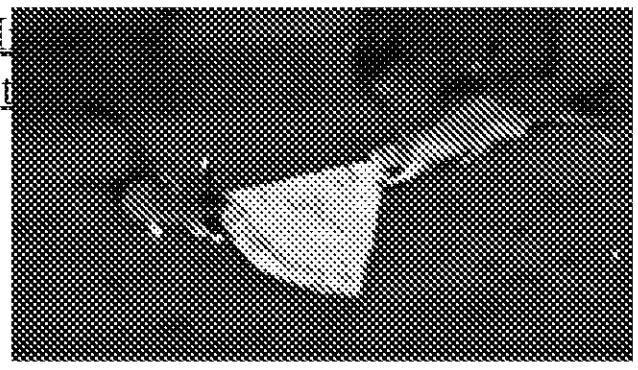
- 
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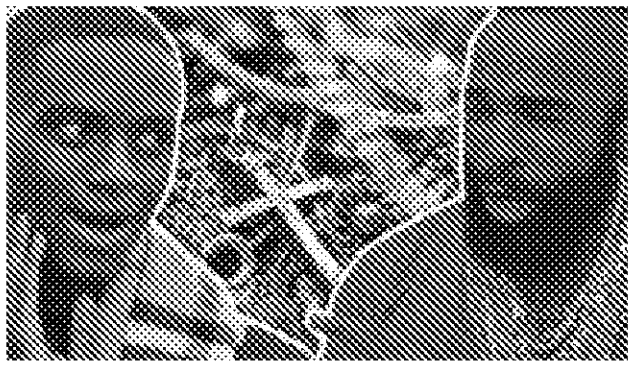
- 
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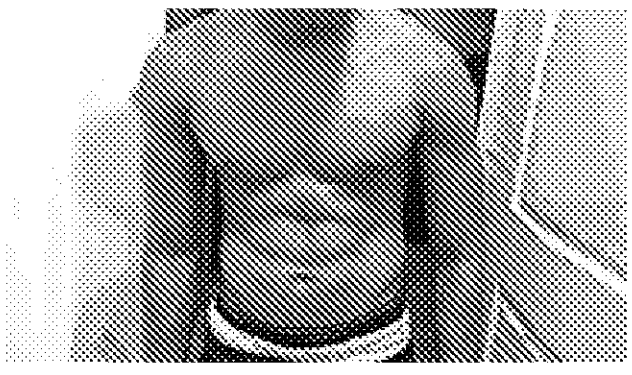
- 
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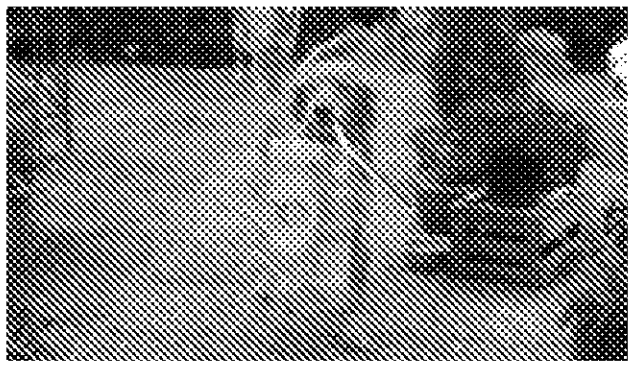
- 
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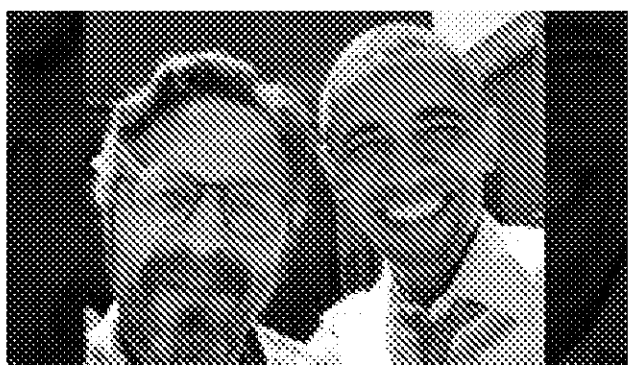
- 
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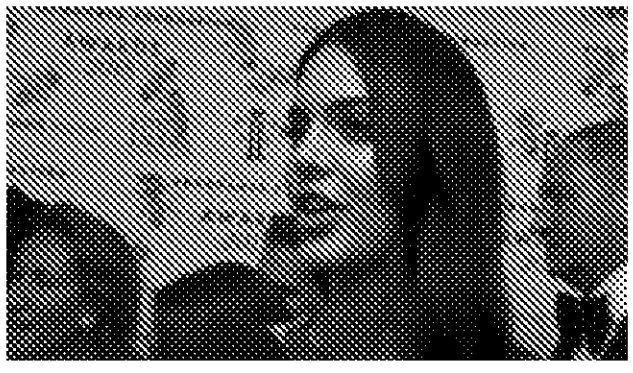
- 
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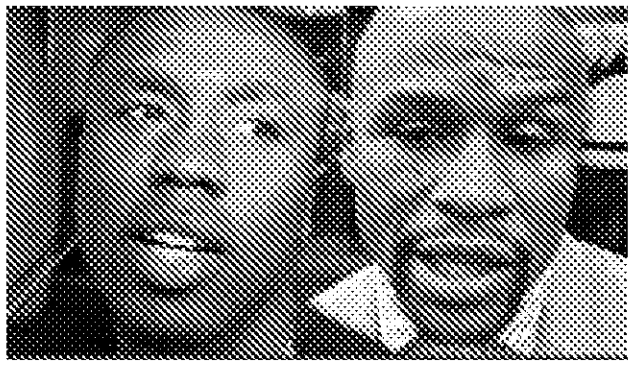
- 
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Home

Dan Bilzerian Sues Website ... I Don't Have Any STDs!!!

Dan Bilzerian

Sues Website

I Don't Have Any STDs!!!

8/10/2015 12:12 PM PDT BY TMZ STAFF

EXCLUSIVE

Dan Bilzerian says he's clean as a whistle, which is why he's suing a website for claiming he's riddled with an STD.

Bilzerian filed a defamation suit against **TheDirty.com** and its founder, **Nik Richie**, claiming its story that he gave a sex partner chlamydia is false and damaging.

The playboy is complaining about a comment a woman made on the site, "I ended up getting super drunk and sleeping with Dan. I got tested two weeks later and lucky me I found out he gave me chlamydia."

Many websites are protected from such lawsuits by not editing the comments section. Richie has been sued before for comments on the site, and won. Bilzerian says this one's different, because the site posted pics of him with several women next to the comment.

Bilzerian and Richie have a long history of battling each other, most recently **in cake form**. Yes, really.

See also

- Dan Bilzerian -- Drops $650K On VIP Wristband for Rave
- 30 Times Dan Bilzerian Flaunted His Wealth -- See The Flashy Photos!
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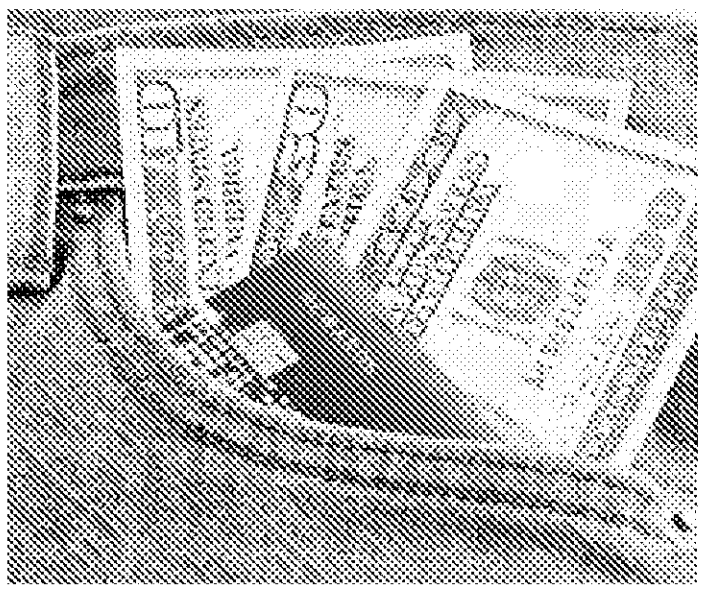

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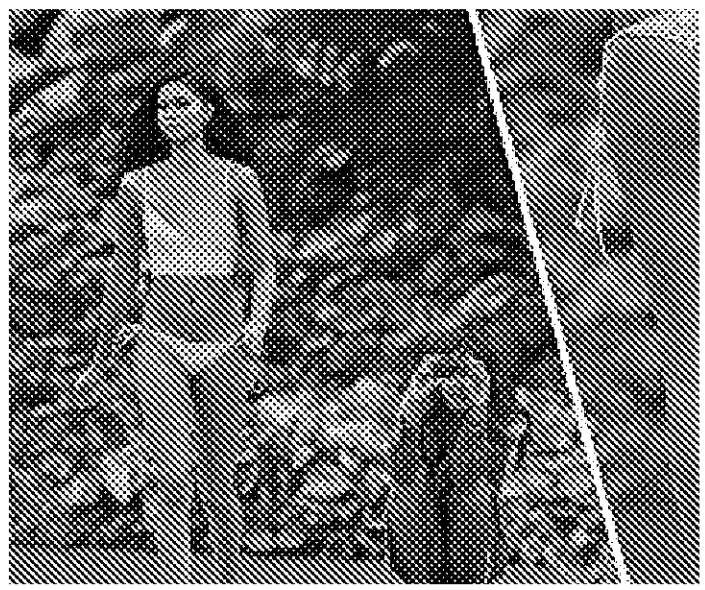
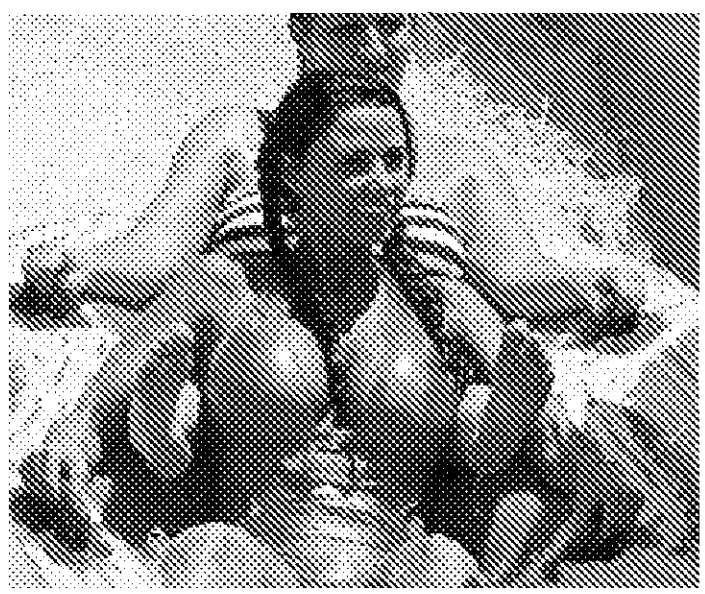


Supermodel Chanel Iman was eaten alive in Hawaii!

Miley's Fans Bare All

Scott Disick's New Chick Says She Ain't Banging Him!



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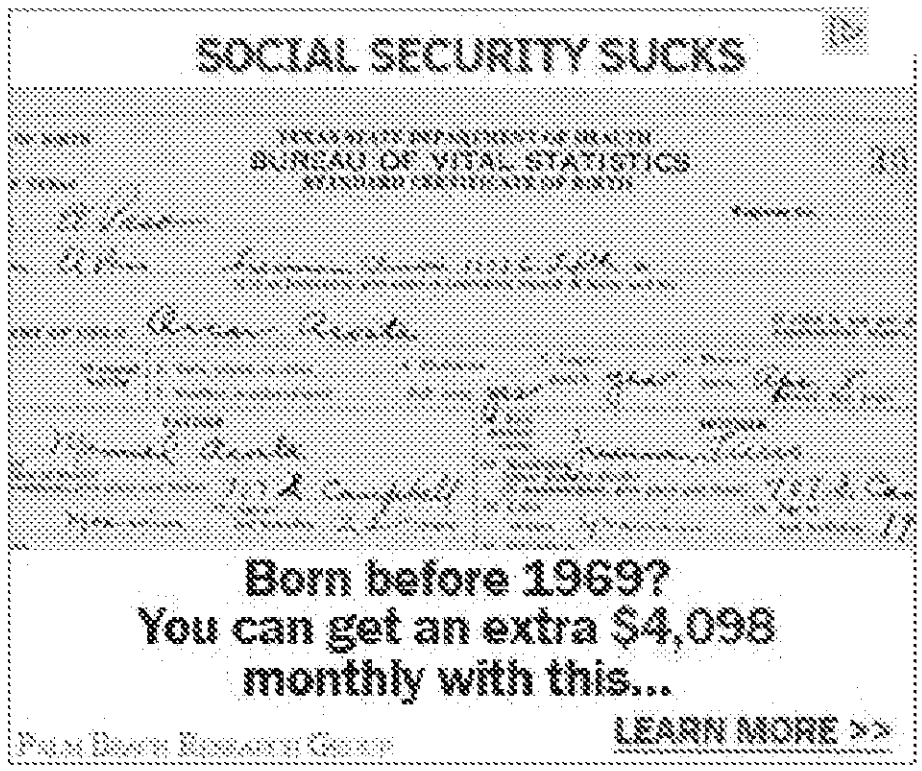

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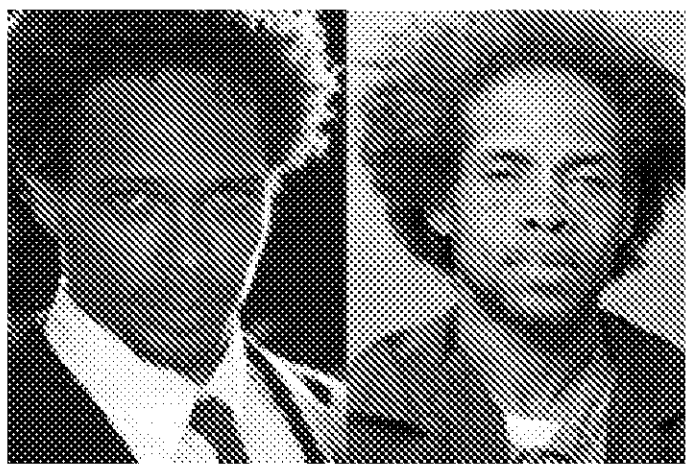
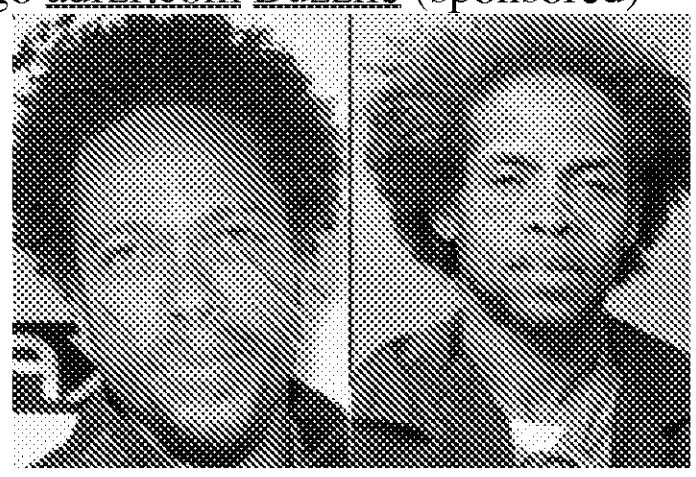
- 1.  15 Horrible Crimes Committed by Famous Celebrities 3 days ago adrzr.com Buzzlie (sponsored)
- 2.  15 Celebrities That You Forgot Committed Horrible Crimes 3 days ago adrzr.com Buzzlie (sponsored)

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Join the discussion...

Ryan · 2 months ago

He's an ass trying to buy his way into fame. Best of luck to him in that aspect, but if it was a comment by a third party... That would be like charging Facebook when someone writes a rude comment about you. If he can find out who wrote the comment, maybe, but good luck dude. I personally just think he's staying relevant. Paying $650k for a rave wristband and now this? I'm sure he has an amazing life, but this reeks of desperation... As an aside, has he ever proven he washed out of BUDS (Seal School) with an injury? He says it constantly, but I've never seen an ounce of proof. Considering how much he posts about himself, you'd think he'd have some of that paperwork online. Just curious... If he did, then I'm all good with that part, but he better not be claiming false honor.

3 · Reply · Share ›

L King · 2 months ago

What court is letting these so called celebrities file stupid lawsuits? The web site didn't say this douchebag had an STD, it was a quote from a bimbo that slept with him. It obvious that he's an idiot, but what excuse do his lawyers have?

2 · Reply · Share ›

Chloe Brooks · 2 months ago

2 things: considering what a manho he is chlamydia is not such a stretch to believe it's true. AND claiming you were drunk to sleep with him is lame. Granted if he didn't have money women would not look at him twice but, oh please, honey.

2 · Reply · Share ›

Tic · 2 months ago

The HO's that hangout with Dan all know they must perform by the end of the night.They eat,drink and dance all day then it's time to give your soul to a hideous man. Your walk of shame will haunt you for years to come.

4 · Reply · Share ›

trollntruth · 2 months ago

My ex use to bone dan.....and I bone her bare back now. Fml. I should have just boned a kardashian. Same risk way more reward

3 · Reply · Share ›

wokkawokka · 2 months ago

Dan Bilzerian is a fraud. He rents his Hollywood home and doesn't even own the jets he flies in. Half his cars are leased and he helps funnel his dads money who's a felon living in the Caribbean island of St. Kitts. The whole "poker" mirage is just that..... A mirage of smoke and mirrors

10 · Reply · Share ›

trollntruth ➧ wokkawokka · 2 months ago

Truth!!!!

· Reply · Share ›

John Baker · 2 months ago

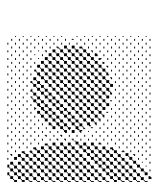
You girls call him nasty but most of you are probably sleeping with just as many people as him

2 · Reply · Share ›

trollntruth ➧ John Baker · 2 months ago

And raw dawg

2 · Reply · Share ›



seriously? · 2 months ago

It doesn't take a website to tell us that Dan has VD, it's common knowledge!

4 · Reply · Share ›

Passion Of The Taint · 2 months ago

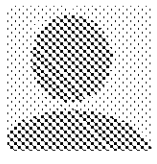
Yes you did Dan!!!! You gave an acquaintance of mine a drippy peepee! He was in pain for weeks! You sick Beardo!!!!

6 · Reply · Share ›

AlterEGO · 2 months ago

Did not say what year in story?

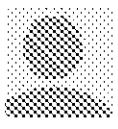
· Reply · Share ›



Professor Hoops · 2 months ago

I honestly don't know either of these d-bags.

4 · Reply · Share ›



BlueyesRani ➧ Professor Hoops · 2 months ago

And we are better people for that!

1 · Reply · Share ›

BlueyesRani · 2 months ago

Maybe something crawled out of that breeding ground on his face & into her wooha.....YUCK!!! BTW...who is this clod?

2 · Reply · Share ›

DANIKAHUNTER · 2 months ago

Nasty man he's lucky his sausage hasn't fallen off or go rotten!

4 · Reply · Share ›

Dolly Llama · 2 months ago

Hush, Lawn Gnome. The Dirty made you.

0 ^ v · Reply · Share ›

The Man In Pain · 2 months ago

He doesn't have any STDs .... ANYMORE, so now he is suing, why not.. Lmao

3 ^ v · Reply · Share ›

The Man In Pain ➔ The Man In Pain · 2 months ago

Again another person that no one knows nor cares about... Must be a slow weekend for TMZ

5 ^ v · Reply · Share ›

really_now · 2 months ago

Never heard of him

4 ^ v · Reply · Share ›

Steve-o · 2 months ago

I hope the same thing happens to him that happened to Bolivar on The Strain.

^ v · Reply · Share ›

Jennifer P · 2 months ago

She should consider herself lucky that Chlamydia is all he gave her. I would have thought he'd be carrying the whole spectrum of winky-diseases.

4 ^ v · Reply · Share ›

Milton · 2 months ago

Don't be silly, cover your willy.

1 ^ v · Reply · Share ›

leongreks@yahoo.com · 2 months ago

Hopefully he don't have any abnormalities related to Sex.But his life isn't perfect with easier women.He had strokes from overexherting with them.

1 ^ v · Reply · Share ›

Wp · 2 months ago

He sued the producers of Lone Survivor because he paid them millions to be in the movie and didn't get the time in the movie that they said he would. What a joke. He pays people off to be in movies.

6 ^ v · Reply · Share ›

Leilani · 2 months ago

I love how he tries to act like he is this big giant bearded playboy douche, when in fact you are such a small small man. 5'6" I believe? All those nasty woman with you constantly makes you look like you are desperately trying to over compensate always. Stupid trust fund moron with no job living off of parents money spreading std's. Yuck.

^ v · Reply · Share ›

Wp ➔ Leilani · 2 months ago

Smaller than 5"6.

2 · Reply · Share ›

Leilani ➔ Wp · 2 months ago

Even better! Such a tiny insecure man

4 · Reply · Share ›

Er Bear ➔ Leilani · 2 months ago

Lmao, he's like Kim K's height! He's a hobbit! Haha

· Reply · Share ›

Cali4life · 2 months ago

Are they both Armenian?

· Reply · Share ›

StarsWrappedInYourHair · 2 months ago

Ahhhhhhhhhhhhhhhhh! Please stop writing about him!!!!

This pig should have NO attention. He's unimportant in every way.

4 · Reply · Share ›

Redickutarded · 2 months ago

Dan, stop being upset. Every disease needs a face. Use this opportunity to actually do some good and spread awareness instead of more STD's to fresh Midwest girls.

4 · Reply · Share ›

Dan Dawson · 2 months ago

Not even warts...damn...must not spend any time in LA...

· Reply · Share ›

Avat

This comment was deleted.

Ryan ➔ Guest · 2 months ago

It's definitely the guy from The a dirty trying to be famous, not the guy who paid over a million dollars to be in Lone Survivor and buys his friends... He's trying a bit too hard. Maybe if he was taller than 5'5", he'd get the reality show he wants.

· Reply · Share ›

Redickutarded ➔ Guest · 2 months ago

Dan! Stop posting comments on the TMZ board trying to defend yourself.

6 · Reply · Share ›

agman · 2 months ago

Oh please. That beard probably has an std.

6 ^ v · Reply · Share ›

Sir Walter Really · 2 months ago

Two Armenian douchebags - hope they both go broke.

4 ^ v · Reply · Share ›

stacinpa · 2 months ago

No need to be a "crab" over it. Whats wrong now, you have the "itch" to clear up ur name? Well just "clap" , u have no " green flow". I hope you dont feel the "burn" from this story.

5 ^ v · Reply · Share ›

colored penguin ➧ stacinpa · 2 months ago

Heh-heh. Herpes.

SJ · 2 months ago

Dan has long since lost his soul and Nik peddles unverified gossip for a living...why we give EITHER any recognition is beyond me....

2 ^ v · Reply · Share ›

Anaaa · 2 months ago

a lion eat dan already please?? Nik Richie is a character.. He only acts the way he does on the site because that's what people want

2 ^ v · Reply · Share ›

bart4u · 2 months ago

If the guy or woman knows they have an STD and has sex without telling their partner they will always lose in a lawsuit. If fact that is also a criminal offense. She should find evidence he knew he had a disease then she could sue him for big bucks.

1 ^ v · Reply · Share ›

Soundofsilence · 2 months ago

A lot more ppl know about it now, than if he had just let it go.....

3 ^ v · Reply · Share ›

purplegurl · 2 months ago

This guy is so nasty and I am embarrassed for my fellow females who throw themselves at this douche.

10 ^ v · Reply · Share ›

Jmw26red ➧ purplegurl · 2 months ago

I know! This guy will treat you like a piece of worthless trash. Don't get the appeal.

1 ^ v · Reply · Share ›

Gary Busey · 2 months ago

Castrate Bilzerian!

3 · Reply · Share ›

Marlon Hewitt · 2 months ago

He's suing because he's saddened that people think he only has one STD. He's slept with hundred of girls, he wants the recognition Dennis Rodman has.

Also, he's saying chlamydia is damaging his reputation (a very easily treated STD), but him throwing women off hotel roofs, and everything else he subjects women to isn't? Hahahaha ok. Loser.

7 · Reply · Share ›

Keith M Kabza · 2 months ago

The only reason a guy with that much money and woman at his disposal would sue is because he did have it. Get ready for a lawsuit TMZ.

5 · Reply · Share ›

Teddy · 2 months ago

Arguably the biggest napoleonic complex in the world.

12 · Reply · Share ›

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  13-Year-Old YouTube Star Dies Mysteriously

MORE #ICYMI >

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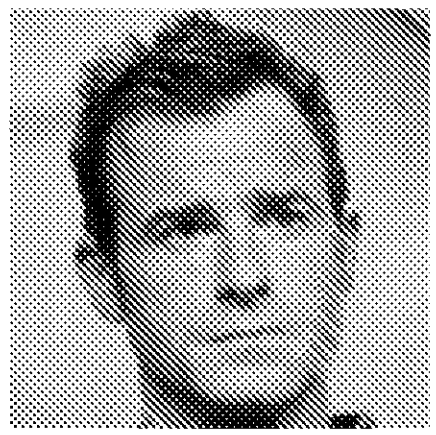
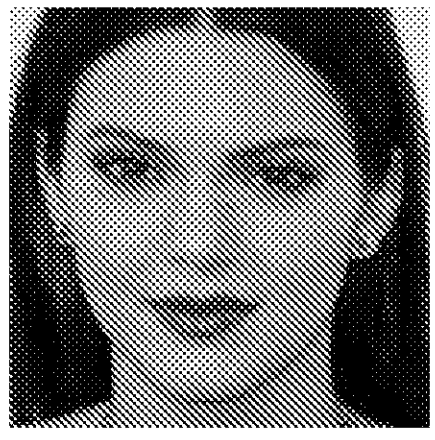
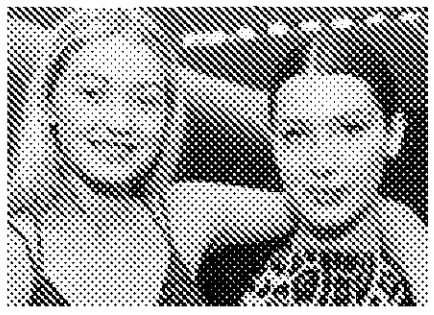
9 FALL TV SHOWS THAT WILL GET CANCELED



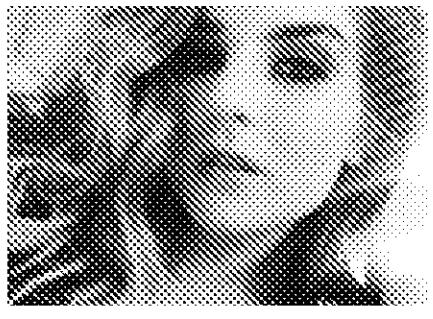
JUSTIN THEROUX IS FURIOUS OVER BRAD PITT'S WEDDING GIFT



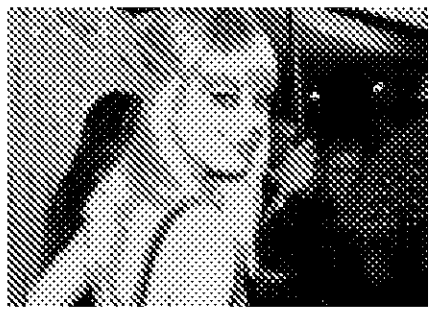
8 STARS WHO TREAT WAITERS LIKE THEY'RE TRASH



Gigi and Bella Hadid At War Over Modeling Gigs?



Jojo's "MTV Cribs" House Tour Was All A Big Lie


Emma Stone Licking People and eating money

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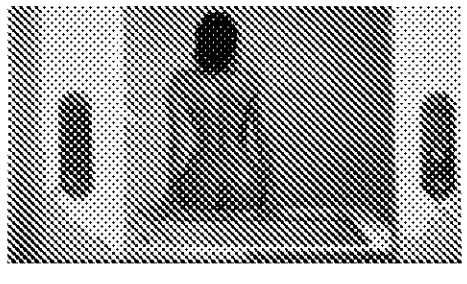
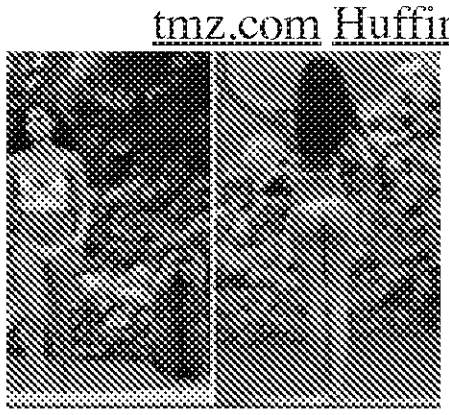
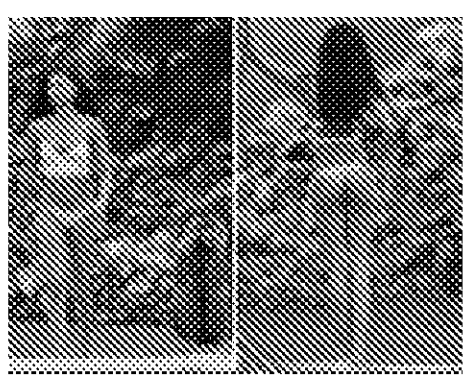
- 1. 
Demi Lovato -- Here's What I look Like Naked (VIDEO) 6 days ago tmz.com HuffingtonPost.com (AOL) TMZ Staff TMZ Staff

Benzino Baby Ready to BUST Out of Ex 'Love and Hip Hop' Star Althea Eaton (PHOTO) a day ago tmz.com HuffingtonPost.com (AOL) TMZ Staff TMZ Staff



Chanel Iman -- Something's Bugging Me! Backside Bitten Severely (PHOTOS) a week ago tmz.com TMZ.com TMZ Staff TMZ Staff

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Tim Tebow -- Jacked, Shirtless, Tossing Children a week ago tmz.com TMZ.com contact@tmz123.com contact@tmz123.com
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This man-made private island has a penthouse, helipad, and shark-feeding station 5 days ago syndication.dtcn.com Digital Trends DigitalTrends.com Jenny McGrath Jenny McGrath (sponsored) private island

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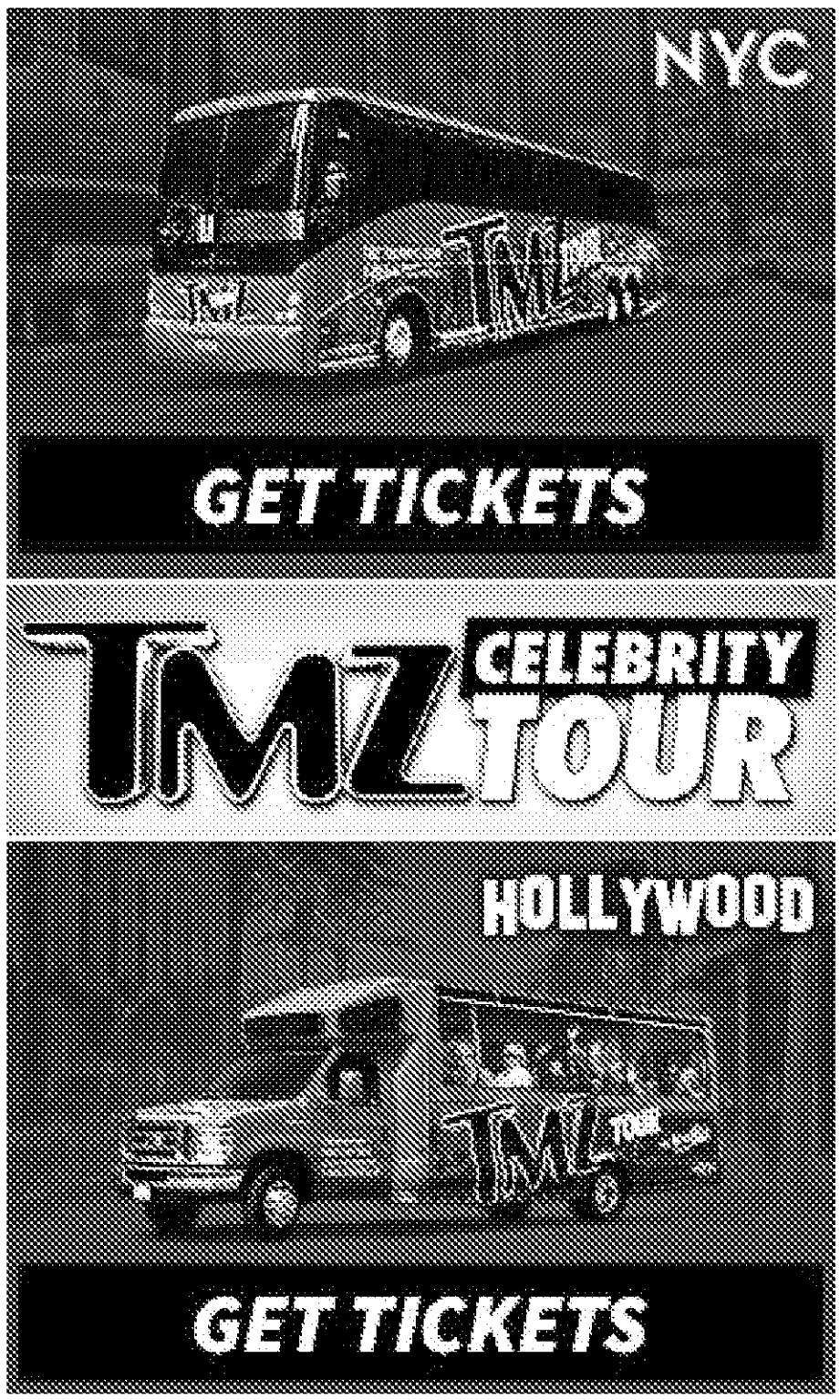

TMZ Sports

Floyd Mayweather
4 Expensive Cars Up In Flames
... In Trailer Fire

Floyd Mayweather's pricey car collection took a massive hit this week -- when a trailer transporting Floyd's Bentley and 2 Rolls Royce whips burned down to the ground ... TMZ Sports has…

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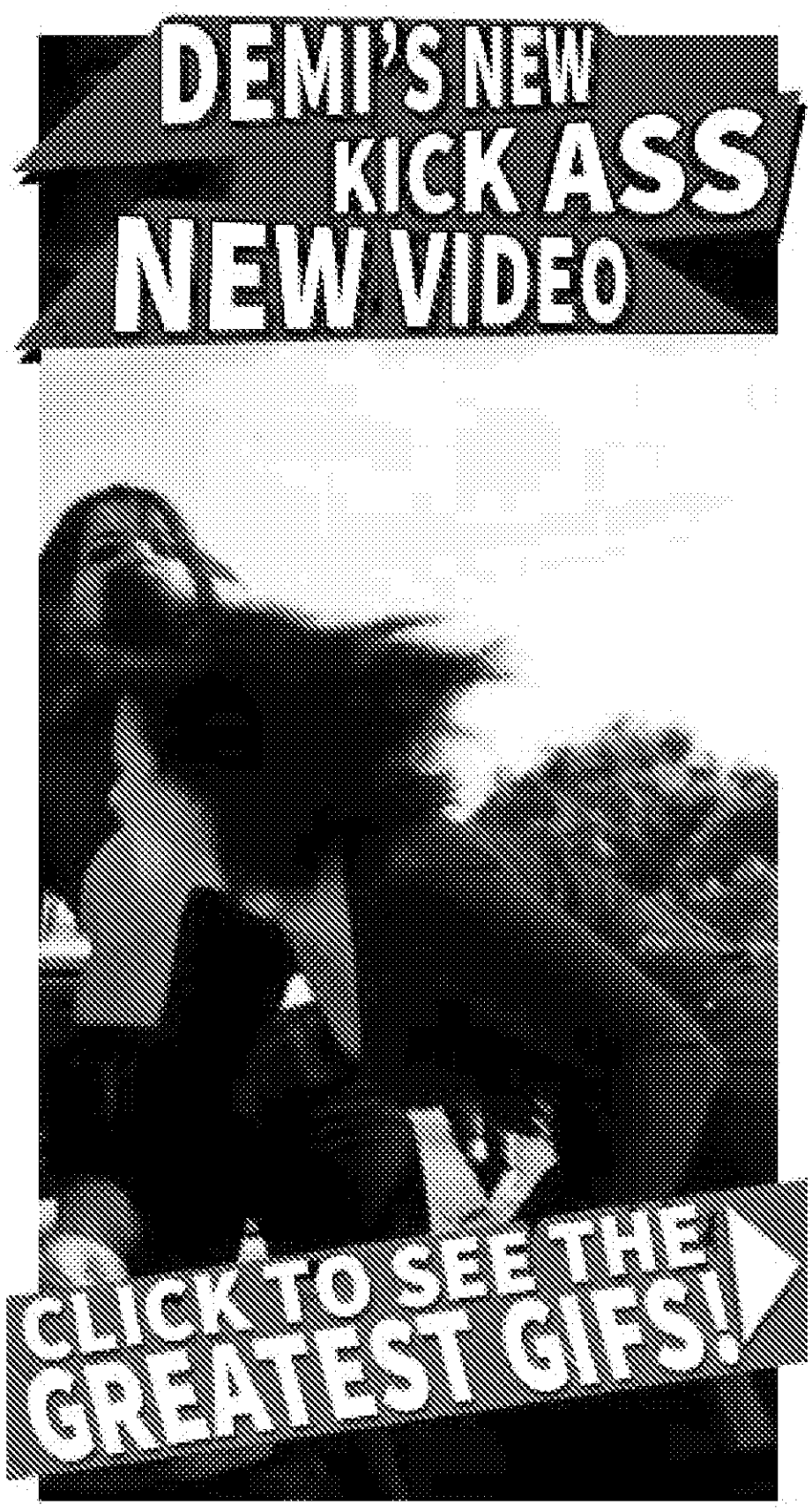

PHOTO GALLERY

Floyd Mayweather's Burnt Cars

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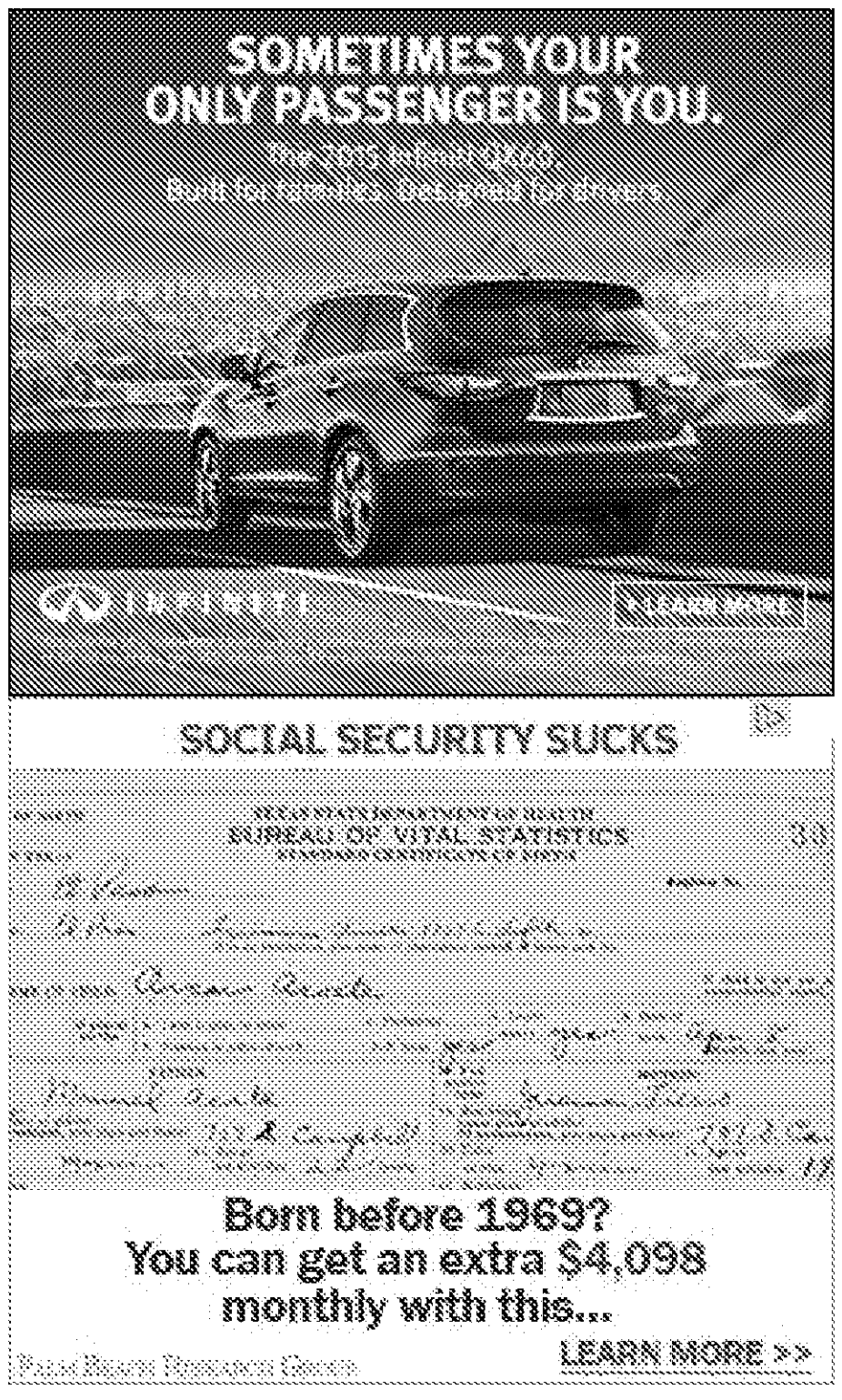

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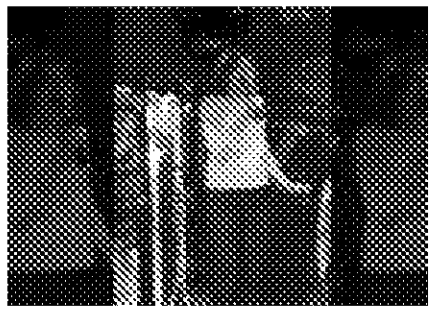
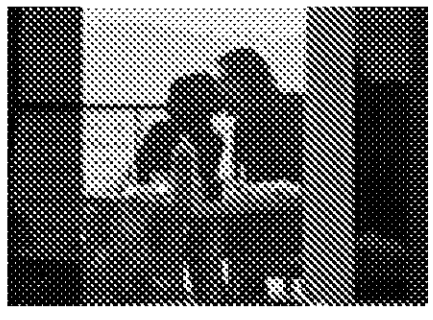

Amanda Knox
Killing It At Karaoke

5/13/2015 | 10:19 AM PDT


Jim Carrey
Left Door Open For Future with GF

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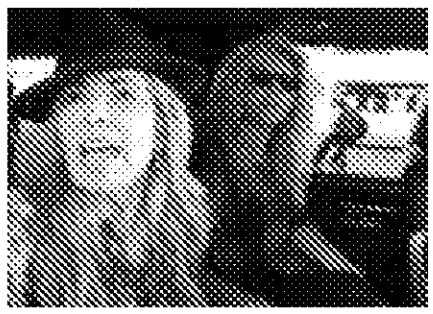
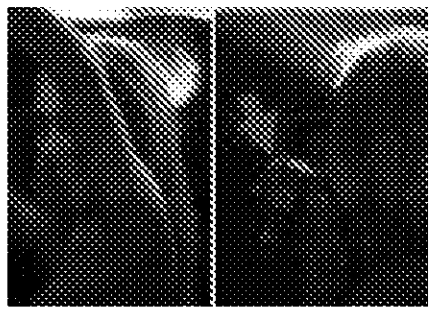
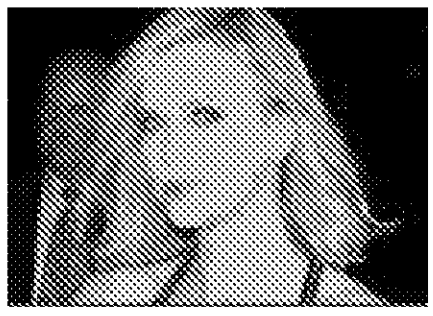

'Mexican Madonna' Gloria Trevi
I'd Give Trump a Second Chance But Only If ...

10/7/2015 | 3:56 PM PDT


Madonna's Daughter Lourdes
Drinking At Mom's Concert Because ... Well, Her Mom's Freakin' Madonna!

10/3/2015 | 2:35 PM PDT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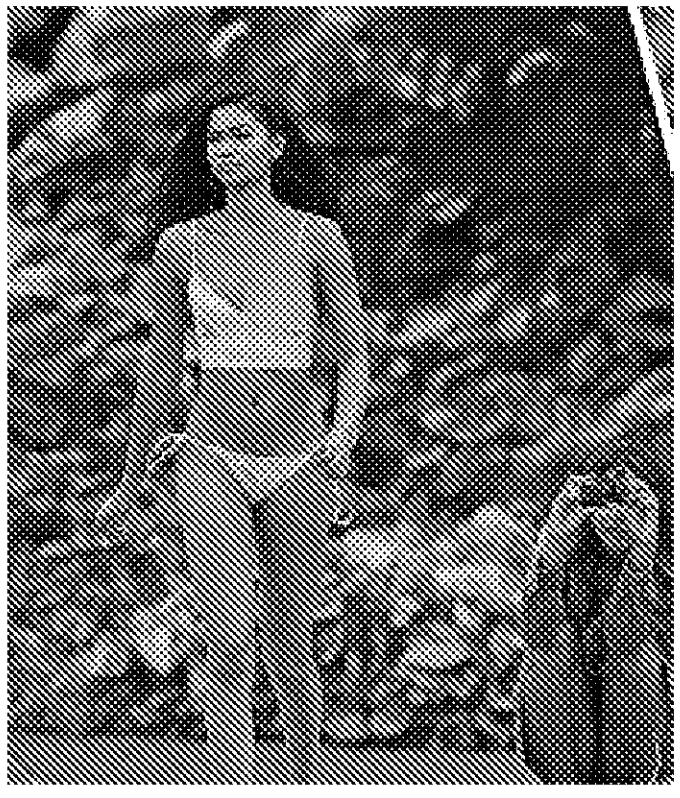

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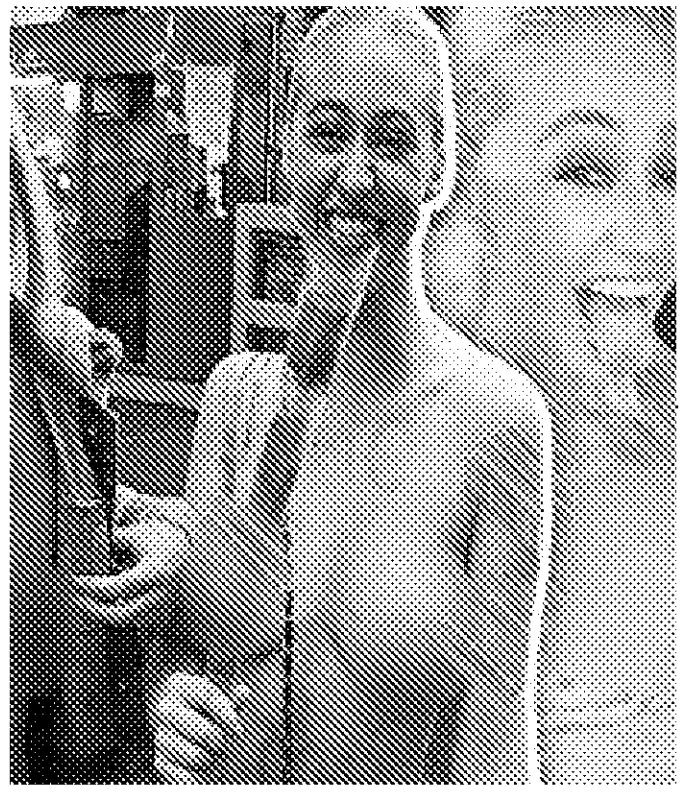
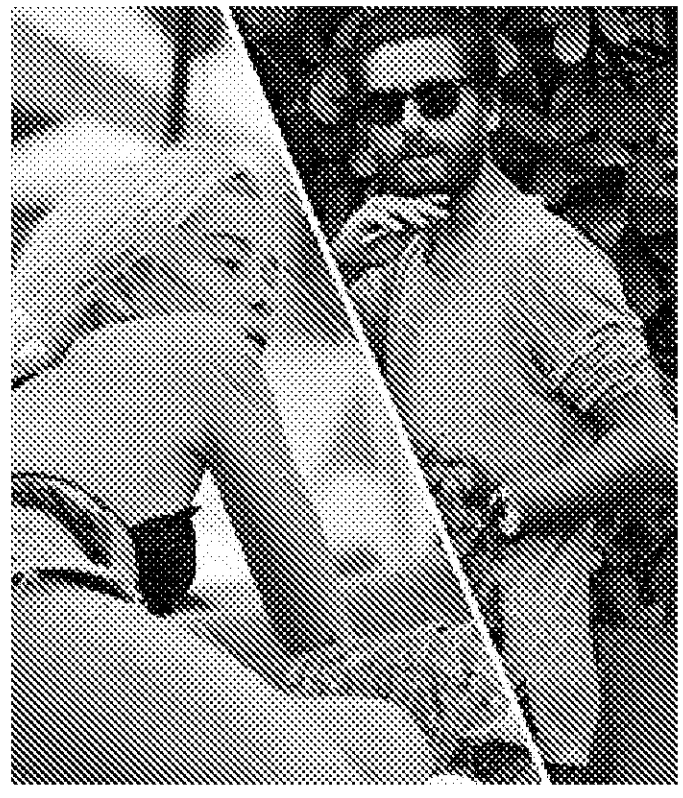


MILEY'S FANS BARE ALL



SCOTT DISICK'S NEW CHICK SAYS SHE AIN'T BANGING HIM!

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- Raven-Symone in trouble over name discrimination controversy
- Brad Paisley thankful for Ashley Madison hacking scandal

the CHIVE

- CHIVE TV's weekly top 5 countdown (Video): October 9th (Video)
- Next level sh*t: October 9th (10 Photos)
- Apparently a lot of girls think 'The Martian' is a true story (16 Photos)

EGOTASTIC!

- Wenwen Yang Busty Asian Curves and Happy Balls
- Lady Gaga Thongtastic "American Horror Story"
- Bella Thorne All Grow'd Up in Tight Leather!

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- SHOCK PICS: Sports Illustrated SUPER SWIMSUIT MODEL Jessica White TAKES IT OFF . . . . .
- COP Got KO'D!! Two Baltimore Police Officers HARASS Man . . . Stop And Detain Him...

US MAGAZINE.COM

- Selena Gomez Gets Scared by "Taylor Swift" on The Ellen DeGeneres Show:...
- Justin Bieber's Father Jeremy Jokes After Nude Photo Leak: I'm a "Proud...
- Ryan Seacrest Was Asked to Be His Sister's "Man of Honor" at Wedding: See...

gossip girl

- John Stamos To Be Charged With DUI Under the Influence of GHB!
- Khloe Kardashian's Best Friend Malika Haqq Arrested
- Who Is Justin Bieber's Rumored New Girlfriend Jayde Pierce?

JUST JARED

- Halle Berry's 'Extant' Canceled By CBS After Two Seasons
- The 'Hail, Caesar!' Movie Trailer Has Too Many Stars to Count!
- Justin Bieber Debuts 'Purpose' Album Artwork - See All Three Versions Here

HUFFPOST ENTERTAINMENT

- Shepard Fairey (and His Art) Make the Jump From Covert to Overt
- Blessed Are the Risk Takers
- John Goodman Reveals Weight Loss At Movie Premiere

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EXHIBIT 15

S.B. 444, 2015 Leg.,
78th Sess. (Nev. 2015)

Senate Bill No. 444–Committee on Judiciary

CHAPTER.....

AN ACT relating to civil actions; revising provisions relating to special motions to dismiss certain claims based upon the right to petition and the right to free speech under certain circumstances; and providing other matters properly relating thereto.

Legislative Counsel's Digest:

Existing law establishes certain provisions to deter frivolous or vexatious lawsuits (Strategic Lawsuits Against Public Participation, commonly known as "SLAPP lawsuits"). (Chapter 387, Statutes of Nevada 1997, p. 1363; NRS 41.635-41.670) A SLAPP lawsuit is characterized as a meritless suit filed primarily to discourage the named defendant's exercise of First Amendment rights. "The hallmark of a SLAPP lawsuit is that it is filed to obtain a financial advantage over one's adversary by increasing litigation costs until the adversary's case is weakened or abandoned." (*Metabolic Research, Inc. v. Ferrel*, 693 F.3d 795, 796 n.1 (9th Cir. 2012))

Existing law provides that a person who engages in good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern is immune from civil liability for claims based upon that communication. (NRS 41.650) Existing law also provides that if an action is brought against a person based upon such good faith communication, the person may file a special motion to dismiss the claim. If a special motion to dismiss is filed, the court must first determine whether the moving party has established, by a preponderance of the evidence, that the claim is based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern. If the court determines that the moving party has met this burden, the court must then determine whether the person who brought the claim has established by clear and convincing evidence a probability of prevailing on the claim. While the court's ruling on the special motion to dismiss is pending and while the disposition of any appeal from that ruling is pending, the court must stay discovery. (NRS 41.660)

Section 13 of this bill revises provisions governing a special motion to dismiss a claim that is based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern. **Section 13** increases from 7 days to 20 judicial days the time within which a court must rule on a special motion to dismiss. **Section 13** replaces the determination of whether a person who brought the claim has established by clear and convincing evidence a probability of prevailing on the claim and instead requires a court to determine whether the person has demonstrated with prima facie evidence a probability of prevailing on the claim. **Section 13** also authorizes limited discovery for the purposes of allowing a party to obtain certain information necessary to meet or oppose the burden of the party who brought the claim to demonstrate with prima facie evidence a probability of prevailing on the claim. Finally, **section 13** requires the court to modify certain deadlines upon a finding that such a modification would serve the interests of justice.

EXPLANATION – Matter in ***bolded italics*** is new; matter between brackets [~~omitted material~~] is material to be omitted.

THE PEOPLE OF THE STATE OF NEVADA, REPRESENTED IN SENATE AND ASSEMBLY, DO ENACT AS FOLLOWS:

Sections 1-3, 3.5, 4, 4.5, 5-9, 9.5 and 10-12. (Deleted by amendment.)

Sec. 12.5. Chapter 41 of NRS is hereby amended by adding thereto a new section to read as follows:

The Legislature finds and declares that:

1. NRS 41.660 provides certain protections to a person against whom an action is brought, if the action is based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern.

2. When a plaintiff must demonstrate a probability of success of prevailing on a claim pursuant to NRS 41.660, the Legislature intends that in determining whether the plaintiff "has demonstrated with prima facie evidence a probability of prevailing on the claim" the plaintiff must meet the same burden of proof that a plaintiff has been required to meet pursuant to California's anti-Strategic Lawsuits Against Public Participation law as of the effective date of this act.

Sec. 13. NRS 41.660 is hereby amended to read as follows:

41.660 1. If an action is brought against a person based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern:

(a) The person against whom the action is brought may file a special motion to dismiss; and

(b) The Attorney General or the chief legal officer or attorney of a political subdivision of this State may defend or otherwise support the person against whom the action is brought. If the Attorney General or the chief legal officer or attorney of a political subdivision has a conflict of interest in, or is otherwise disqualified from, defending or otherwise supporting the person, the Attorney General or the chief legal officer or attorney of a political subdivision may employ special counsel to defend or otherwise support the person.

2. A special motion to dismiss must be filed within 60 days after service of the complaint, which period may be extended by the court for good cause shown.

3. If a special motion to dismiss is filed pursuant to subsection 2, the court shall:

(a) Determine whether the moving party has established, by a preponderance of the evidence, that the claim is based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern;

(b) If the court determines that the moving party has met the burden pursuant to paragraph (a), determine whether the plaintiff has ~~[established by clear and convincing]~~ ***demonstrated with prima facie*** evidence a probability of prevailing on the claim;

(c) If the court determines that the plaintiff has established a probability of prevailing on the claim pursuant to paragraph (b), ensure that such determination will not:

(1) Be admitted into evidence at any later stage of the underlying action or subsequent proceeding; or

(2) Affect the burden of proof that is applied in the underlying action or subsequent proceeding;

(d) Consider such evidence, written or oral, by witnesses or affidavits, as may be material in making a determination pursuant to paragraphs (a) and (b);

(e) ~~[Stay]~~ ***Except as otherwise provided in subsection 4, stay*** discovery pending:

(1) A ruling by the court on the motion; and

(2) The disposition of any appeal from the ruling on the motion; and

(f) Rule on the motion within ~~[7]~~ ***20*** judicial days after the motion is served upon the plaintiff.

4. ***Upon a showing by a party that information necessary to meet or oppose the burden pursuant to paragraph (b) of subsection 3 is in the possession of another party or a third party and is not reasonably available without discovery, the court shall allow limited discovery for the purpose of ascertaining such information.***

5. If the court dismisses the action pursuant to a special motion to dismiss filed pursuant to subsection 2, the dismissal operates as an adjudication upon the merits.

6. The court shall modify any deadlines pursuant to this section or any other deadlines relating to a complaint filed pursuant to this section if such modification would serve the interests of justice.

7. As used in this section:

(a) "Complaint" means any action brought against a person based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern, including, without limitation, a counterclaim or cross-claim.

(b) "Plaintiff" means any person asserting a claim, including, without limitation, a counterclaim or cross-claim.

Sec. 14. The amendatory provisions of this act apply to an action commenced on or after the effective date of this act.

Sec. 15. (Deleted by amendment.)

Sec. 16. This act becomes effective upon passage and approval.

EXHIBIT 16

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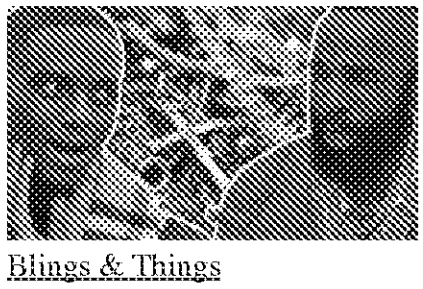
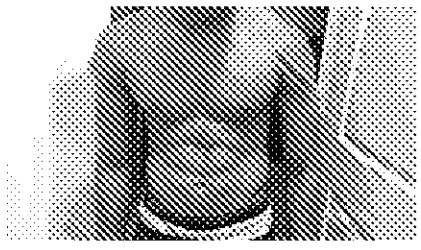
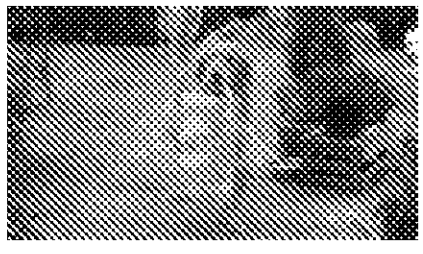
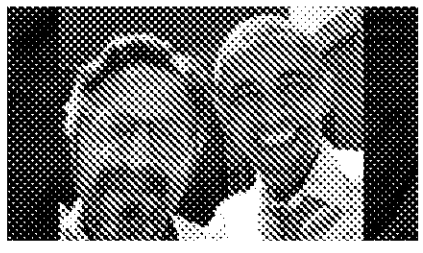
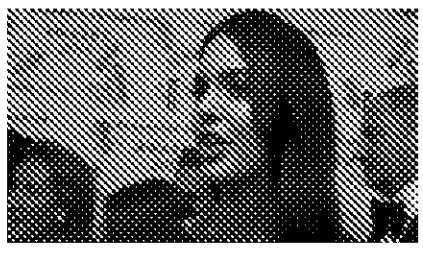
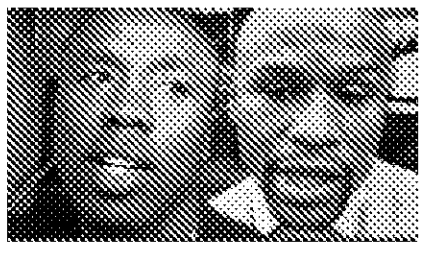
SEARCH TMZ

Two Rats Fight Over a Slice of Pizza

Top 10 Kick Ass GIFS From Demi Lovato's New 'Confident' Music Video



Blings & Things
TMZ's Top Celeb Show-offs

- 
  Guess The Sexy Abs
  See Whose Solid Stomach!
- 
  Adorable Golden Retriever
  Excited To Fetch The Family Groceries
- 
  Marc Maron -- Selfie With Obama ... In His Garage
- 
  Kendall Jenner -- Still Calling Caitlyn ...'He'
- 
  Andre Berto -- If Mayweather Wants to Fight ... Let's Fight!

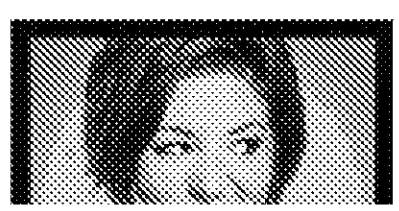
Migos Rapper Offset

I'm Not A Gang Member

So Let Me Outta Jail!!

10/9/2015 11:20 AM PDT BY TMZ STAFF

EXCLUSIVE



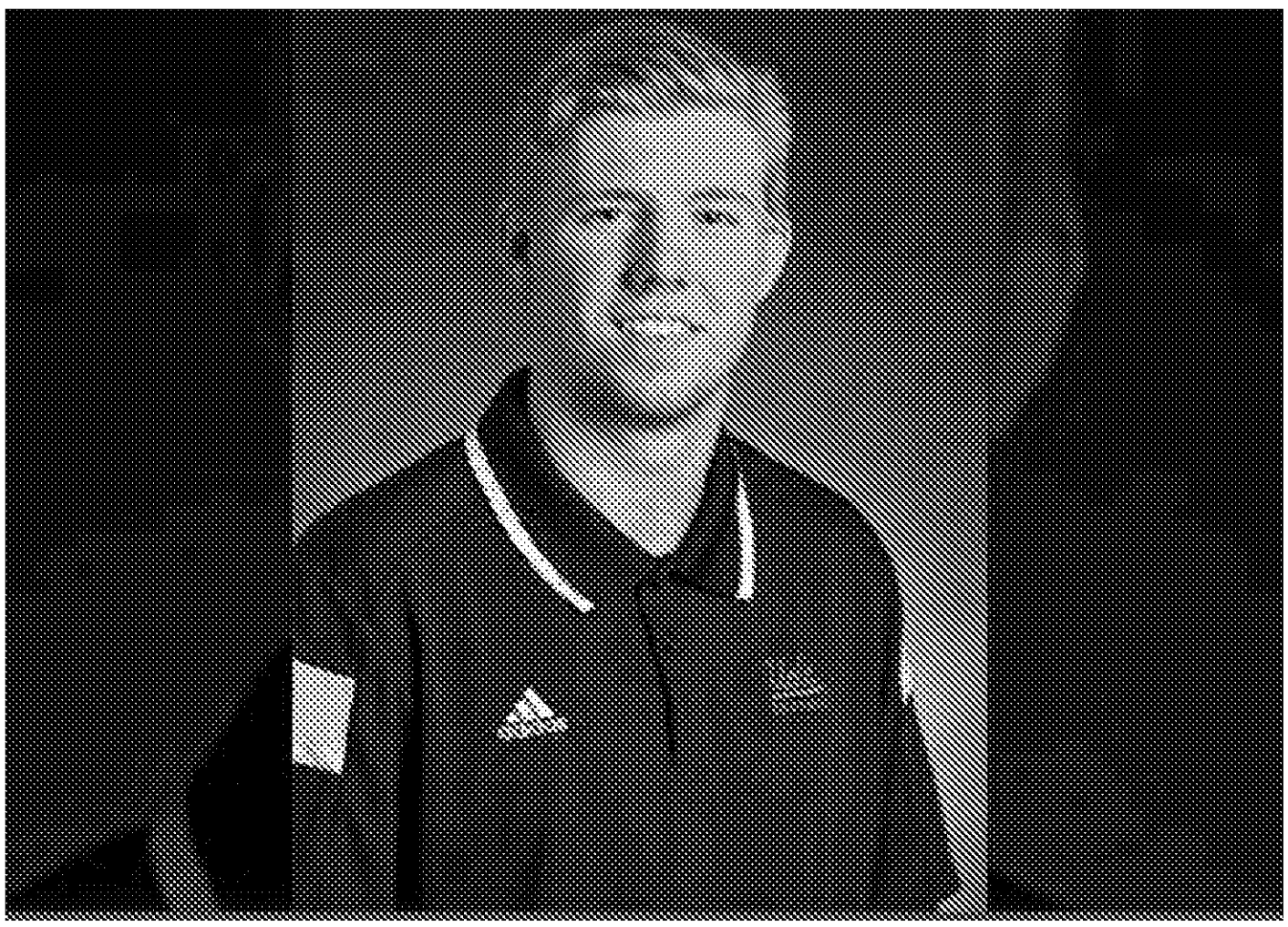
DOING IT
LIVE!

UCLA Punter

Arrested On Suspicion of Rape

39 minutes ago BY TMZ STAFF

breaking news



www.UCLAbruins.com One of the kickers on the **UCLA** football team has been arrested for allegedly raping a woman he met at a party back in 2014 ... this according to police.

Officials say 20-year-old **Adam Searl** was arrested on October 8th and booked on 3 counts of rape. Searl has punted for UCLA five times this season.

According to investigators, Searl met the accuser at an off-campus party in Westwood in October 2014 and accompanied her to a nearby residence.

The woman claims she fell asleep -- but woke up to Searl raping her.

Officials launched an "exhaustive investigation" in conjunction with the UCLA PD -- and the woman eventually identified Searl as the assailant.

Searl was arrested without incident -- and has since been released on $300,000 bail.

UCLA football coach **Jim Mora** says Searl has been suspended by the team indefinitely while the legal process runs its course.

See also

- Derrick Rose -- Accused of Drugging and Gang Raping Ex-Girlfriend
- Darren Sharper -- 86'd From College Hall of Fame ... Over Rape Conviction
- Blackhawks Star Patrick Kane -- Reports: Rape Investigation Launched

See More:

TMZ Sports , Crime Hide these

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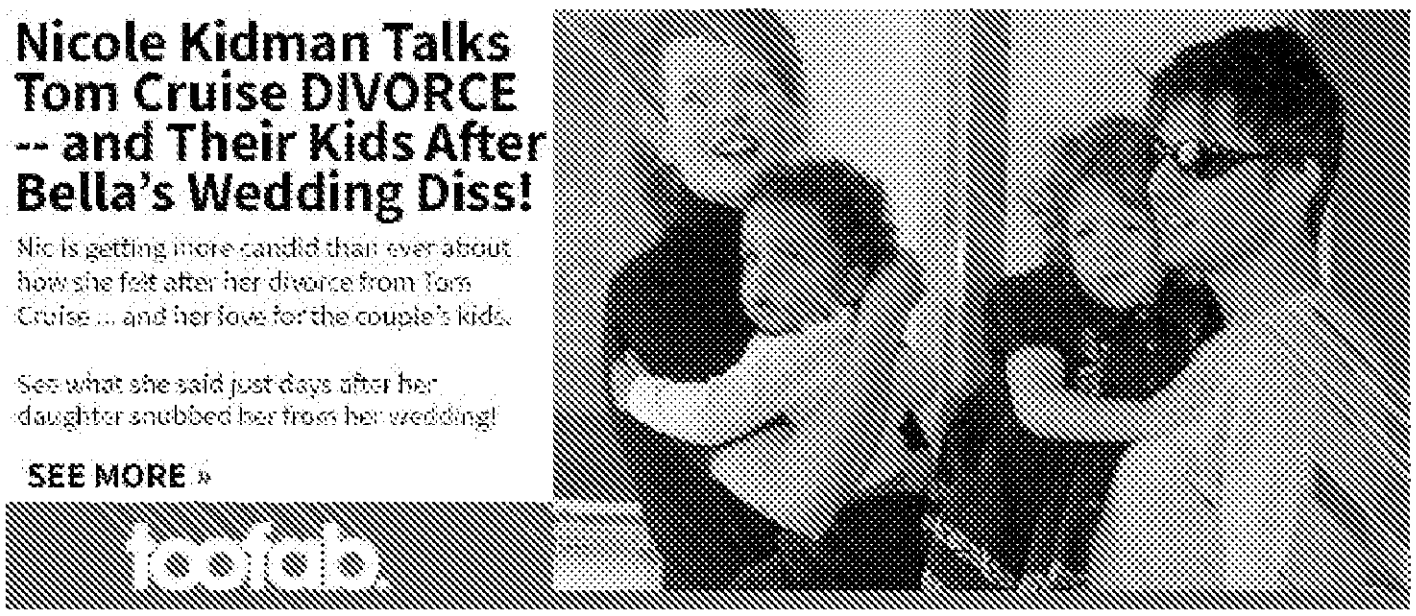
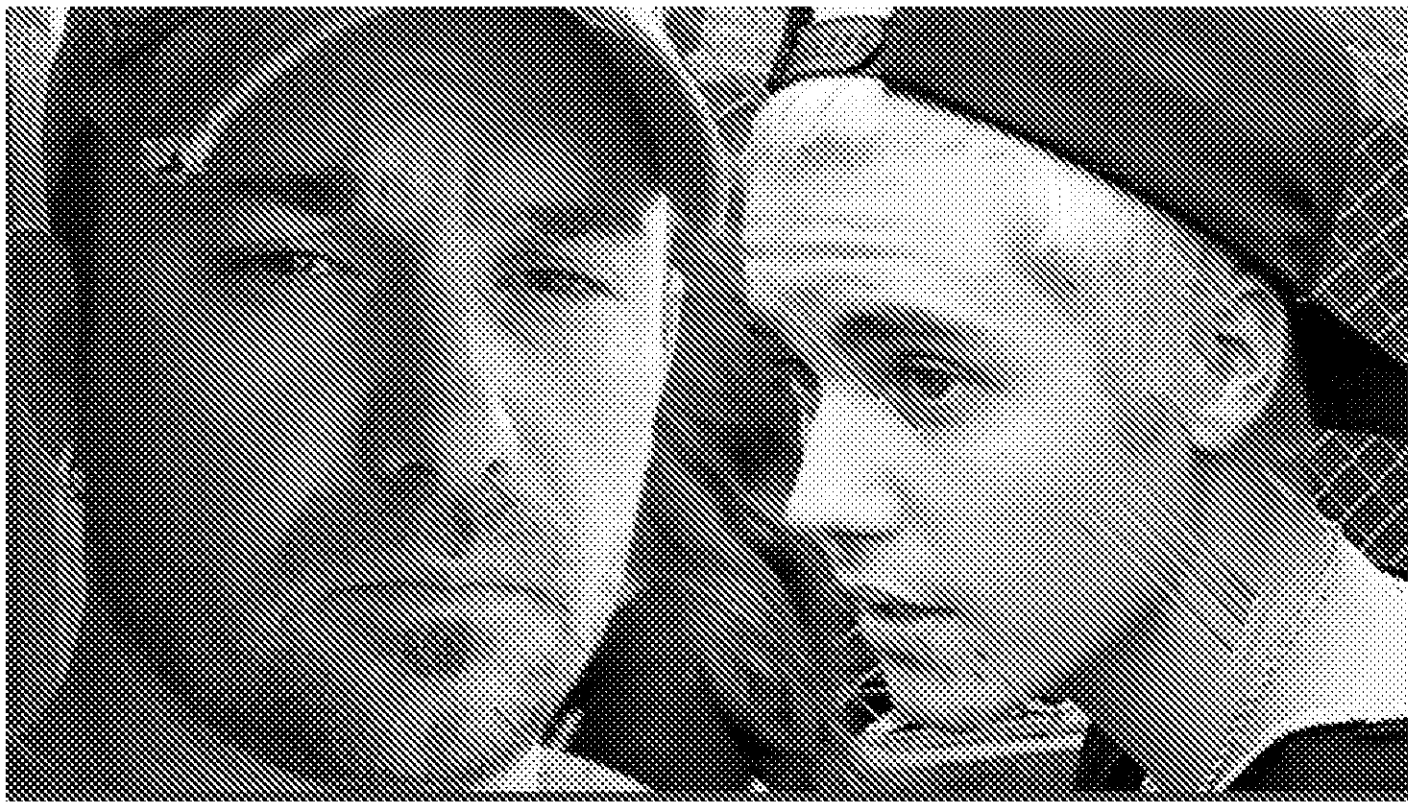
- 49 Comments



Justin Bieber

That Awkward Moment When Your Dad ...

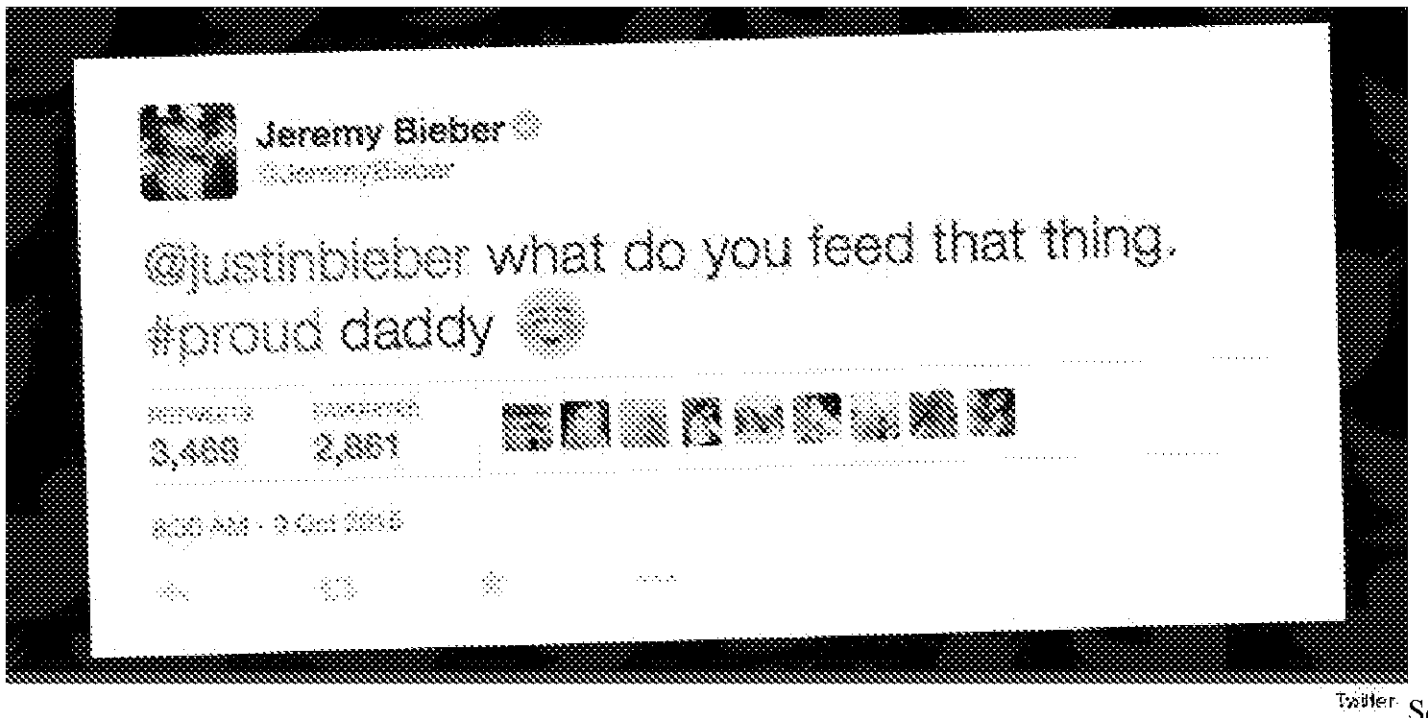
10/9/2015 10:37 AM PDT BY TMZ STAFF



compliments your dong!!!

Justin Bieber's dad **Jeremy** is one proud papa when it comes to his son's one-eyed snake ... and decided to tell the world on Twitter. Not creepy at all ... right?

The elder Biebs attempted to make light of Justin's recently leaked nude photos, asking his son very publicly, "What do you feed that thing?" with the hashtag #proud daddy.



Twitter Seems Jeremy agrees with the masses about Justin **being well endowed** ... and maybe wants a little genetic credit.

Years ago, nude pics of Jeremy were once shopped to media outlets too ... but no takers. It's possible the apple does fall far from the tree.

See also

- Justin Bieber -- Threatens To Sue ... Take Down The Naked Pics Or Else!!
- 'Basketball Wives LA' Star -- Here's My Big Naked Ass ... Any Takers? (PHOTOS)
- Lenny Kravitz -- Exposes Junk ... After Leather Pants Rip Open!!! (PHOTO)

See More:

Justin Bieber , Nudity , Twitter Hide these

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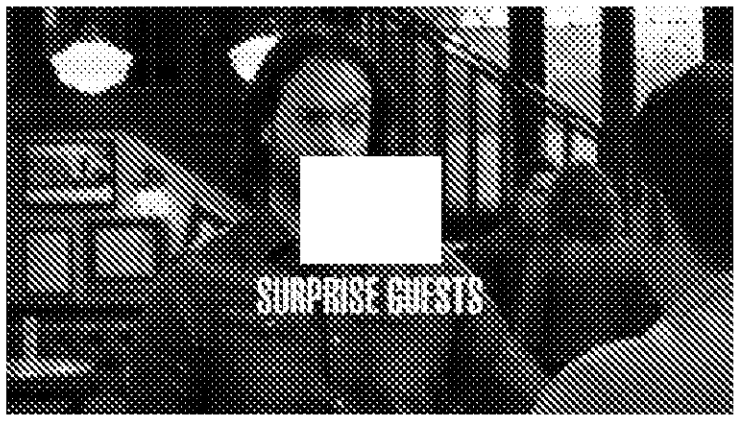

Raven-Symone

Getting Ripped for...

Refusing to Hire 'Black' Names

10/9/2015 10:08 AM PDT BY TMZ STAFF

THAT'S SO RAVEN ...ABC

Raven-Symone threw a giant rock from inside her glass house, and it's bouncing back in her face -- because her refusal to hire people with "black" names has some people calling for her to be fired.

"**The View**" co-host admitted on Thursday she discriminates when it comes to people with names like "Watermelondrea" ... and would not hire someone with such a unique name.

Of course, that comment came from a black woman named Raven-Symone ... while she was rocking a hot pink mohawk.

The irony is not lost on 'View' fans, many of whom are blasting Raven on social media and even calling for her to be replaced ... by Rachel Dolezal.

See also

- Bill Cosby -- Raven Symone Blasts Rape Rumor ... That's Disgusting!
- 'The View' -- We Love Nurses ... We Just Have A Weird Way Of Showing It
- Raven-Symone -- I Have a Girlfriend ... But Don't Call Me 'Gay' OR 'African American'

See More:

Raven Symone , The View , TV , 2 More Stars In Heat , TMZ Black Hide these

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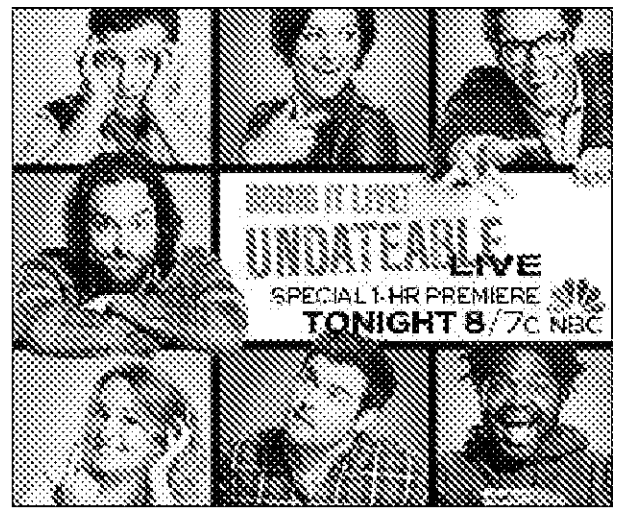

Dylan O'Brien

Did Not Jack Native American Artifacts

'Maze Runner' Studio Says

10/9/2015 9:00 AM PDT BY TMZ STAFF

breaking news

Dylan O'Brien's name has been cleared ... 20th Century Fox says he did not steal Native American treasures while filming in New Mexico -- which means it's really bizarre that he lied about it in the first place.

As we reported ... the star of "**Maze Runner: The Scorch Trials**" bragged he and his co-stars had ignored warnings to keep their mitts off any artifacts they came across. He said they flat out stole a bunch of stuff from Diamond Tail Ranch, where the movie was shot.

The ranch owner told TMZ he reached out to 20th Century Fox **to right the wrong**, and now the studio says it's determined nothing was really taken. A spokesman apologized for O'Brien's comment.

As for why Dylan lied? The 24-year-old's rep hasn't responded to our calls.

Dylan O'Brien Interview - Maze Runner: The Scorch Trials - Live with Kell...

See also

- Steve Rannazzisi -- I Only Had 15 Seconds to Change My 9/11 Lie
- Steve Rannazzisi -- Comedy Central Airs Show Despite 9/11 Lie
- 'League' Star Steve Rannazzisi -- I Lied About Escaping Twin Towers During 9/11

See More:

Movies , CELEBRITY JUSTICE ™ Hide these

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Cheaters HATE this new site!

Sponsored by Instant Checkmate

Enter ANY Name and State… then BRACE yourself! This new site finally gives you a way to expose those dishonest partners for who they really are!

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Justin Bieber

Nude Pics Not THAT Bad ...

'Cause I'm That Big

10/9/2015 1:00 AM PDT BY TMZ STAFF

EXCLUSIVE

TMZ.com **Justin Bieber**'s lawyers are barking about three nude pics taken of him on vacation in Bora Bora, but we know Justin isn't all that pissed because the shots show just how ... GIFTED he is.

Multiple sources close to Bieber tell TMZ he was upset paparazzi, armed with telephoto lenses, snapped the photos of him butt (and other parts) naked frolicking with **Jayde Pierce**. We're told he thought it was a total invasion of his privacy.

We saw it the same way, and decided NOT to post the images. But our sources say Justin's anger faded when the pics went viral ... for one seemingly larger than average reason: Bieber's a really big deal, and we're told he's happy the world knows it now.

As we reported, **JB's lawyers threatened** media outlets that published the pics. We're told his legal team was just doing its job ... sending the message that Justin's not okay with the violation.

But reality is, there's almost zero chance Justin sues ... 'cause as they say, size matters.

Instagram

See also

- Justin Bieber -- Strips Down For Raunchy S&M-ish Photo Shoot
- 'Basketball Wives LA' Star -- Here's My Big Naked Ass ... Any Takers? (PHOTOS)
- Demi Lovato -- This Is Me Naked ... and I'm Cool with It (VIDEO)

See More:

Justin Bieber , CELEBRITY JUSTICE ™ , Exclusive , 5 More Stars In Heat , Celebrity Butts , Hot Bodies , Paparazzi , Paparazzi Photo Hide these

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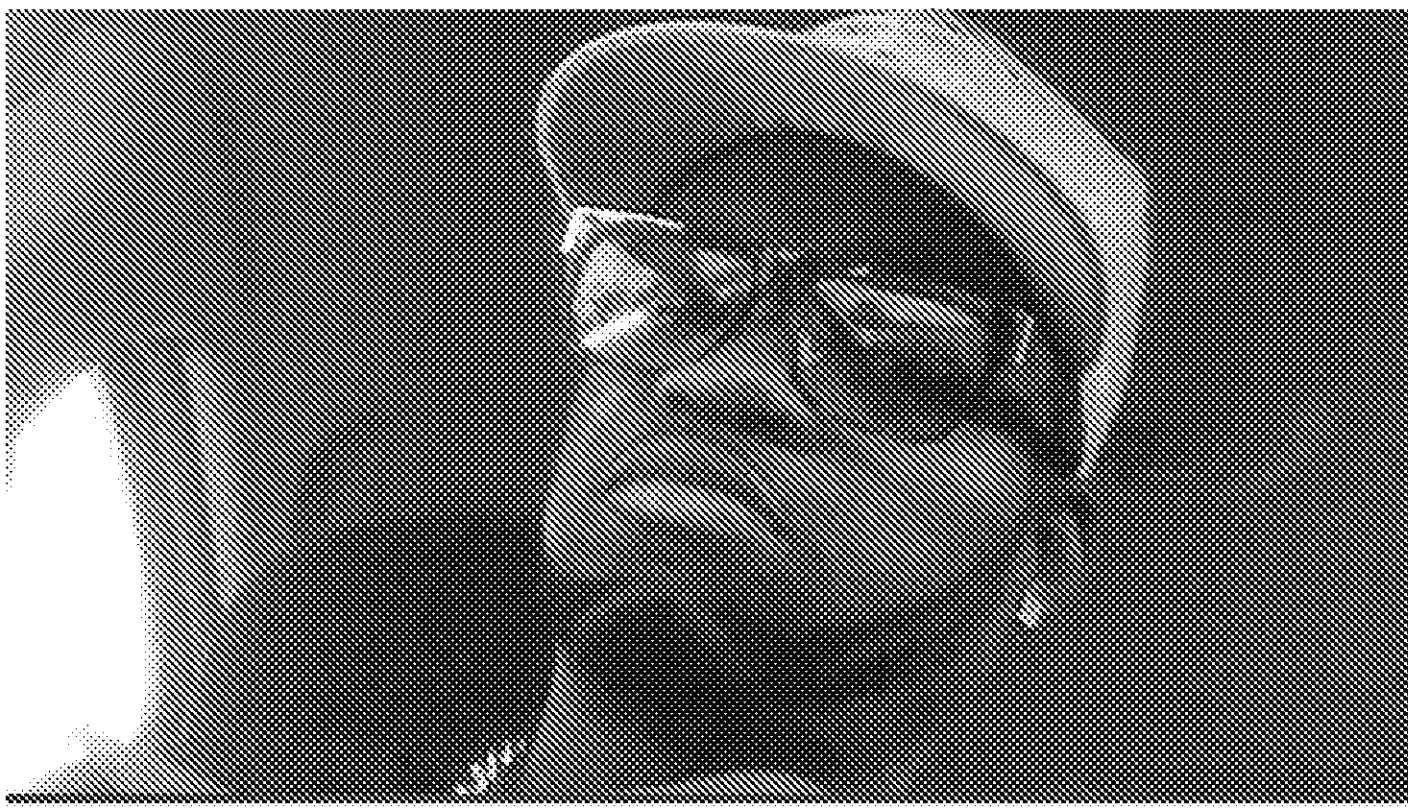
Three 6 Mafia

Koopsta Knicca Dies From Stroke

10/9/2015 7:58 AM PDT BY TMZ STAFF

breaking news



Instagram Another member of **Three 6 Mafia** has passed away -- **Koopsta Knicca** died on Thursday after suffering a stroke ... according to **DJ Paul**.

Paul announced Koopsta's death on social media Thursday evening, but then did a quick about-face ... saying Koopsta was still fighting, and on life support. He eventually died overnight, and Paul released a statement saying, "Everyone who knew Koop knew hew was very funny and the coolest guy ever! He will be missed!!!"

KK had been hospitalized since last weekend when he suffered the stroke. He was 40, the same age as **Lord Infamous** ... the other Three 6 Mafia member who passed away in 2013.

Getty Koopsta was an original member of the Memphis rap group, but was not with them when they won the Oscar in 2006. He rejoined when they became Da Mafia 6ix, years later.

He had recently started working on a solo record, according to DJ Paul.

#RIPMyKnicca

See also

- Rapper Sean Price Of Heltah Skeltah -- Dead At 43
- Outlawz Rapper Hussein Fatal -- Dies In Car Crash ... Rapped with 2Pac on 'Hit 'Em Up'
- Rapper Capo Shot Dead In Chicago

See More:

Music , R.I.P. , TMZ Black Hide these

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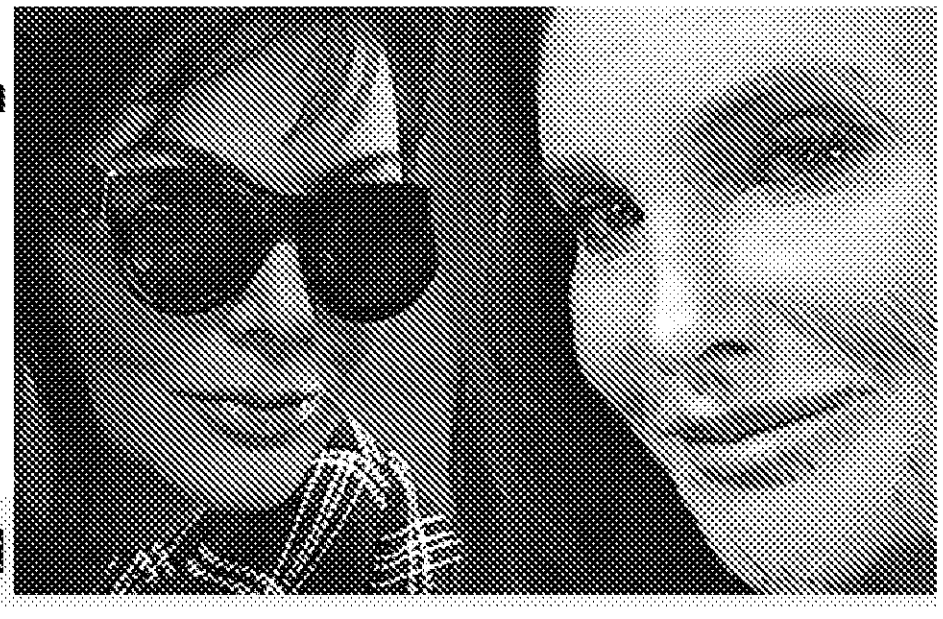
- 147 Comments

Kris Jenner Opens Up on Sex w/Caitlyn in the Air ... What Happens is AWFUL

Thanks heavens it's Friday ... because we're not sure we could function for the rest of the week after hearing this.

SEE MORE »

FISHWRAPPER



Marilyn Manson

The Inspector ...

Reporting for Duty

10/9/2015 9:17 AM PDT BY TMZ STAFF

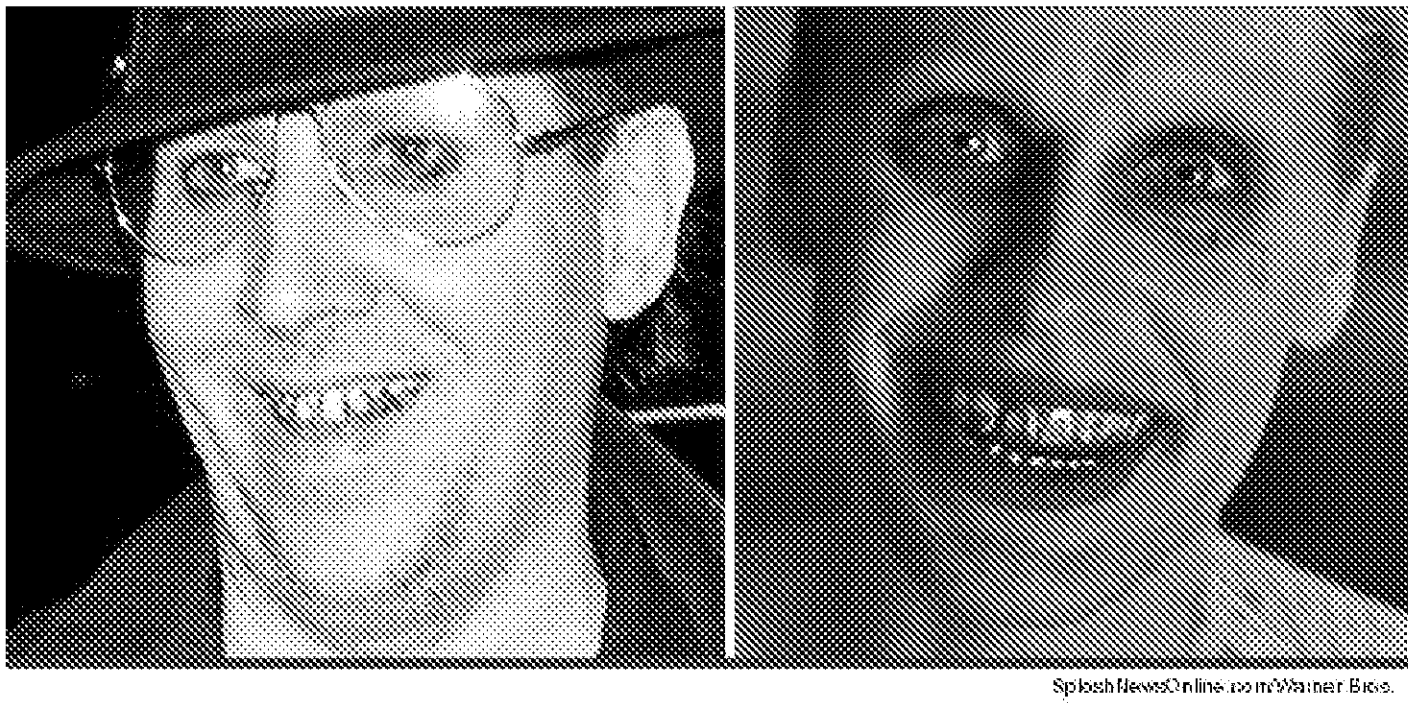
SplashNewsOnline.com

Marilyn Manson was on the hunt for Dr. Claw as he left Nice Guy Thursday night in West Hollywood.

Go go gadget!

And if that doesn't work out, maybe **Jared Leto** might need a stand-in for "Suicide Squad."

Just sayin'.



SplashNewsOnline.com/Warner Bros.

See also

- Jared Leto -- Tasting the Rainbow ... (PHOTO)
- Marilyn Manson -- Antichrist Superstar Returns to Roller Skating
- Marilyn Manson -- Grand Slammed in the Face at a Denny's

See More:

Marilyn Manson , Jared Leto , Paparazzi Photo Hide these

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- 112 Comments

WHOA! Wait Until You See Blanket Now -- This Is the BEST Pic of Him In Years!

No shrouds here!

Blanket Jackson never does public events anymore -- making this new family portrait of him with all his cousins one of the clearest pics in YEARS.

SEE MORE »

Malcolm-Jamal Warner

What Saddens Me Most About Cosby Scandal

... The Show's Legacy

10/9/2015 6:07 AM PDT BY TMZ STAFF

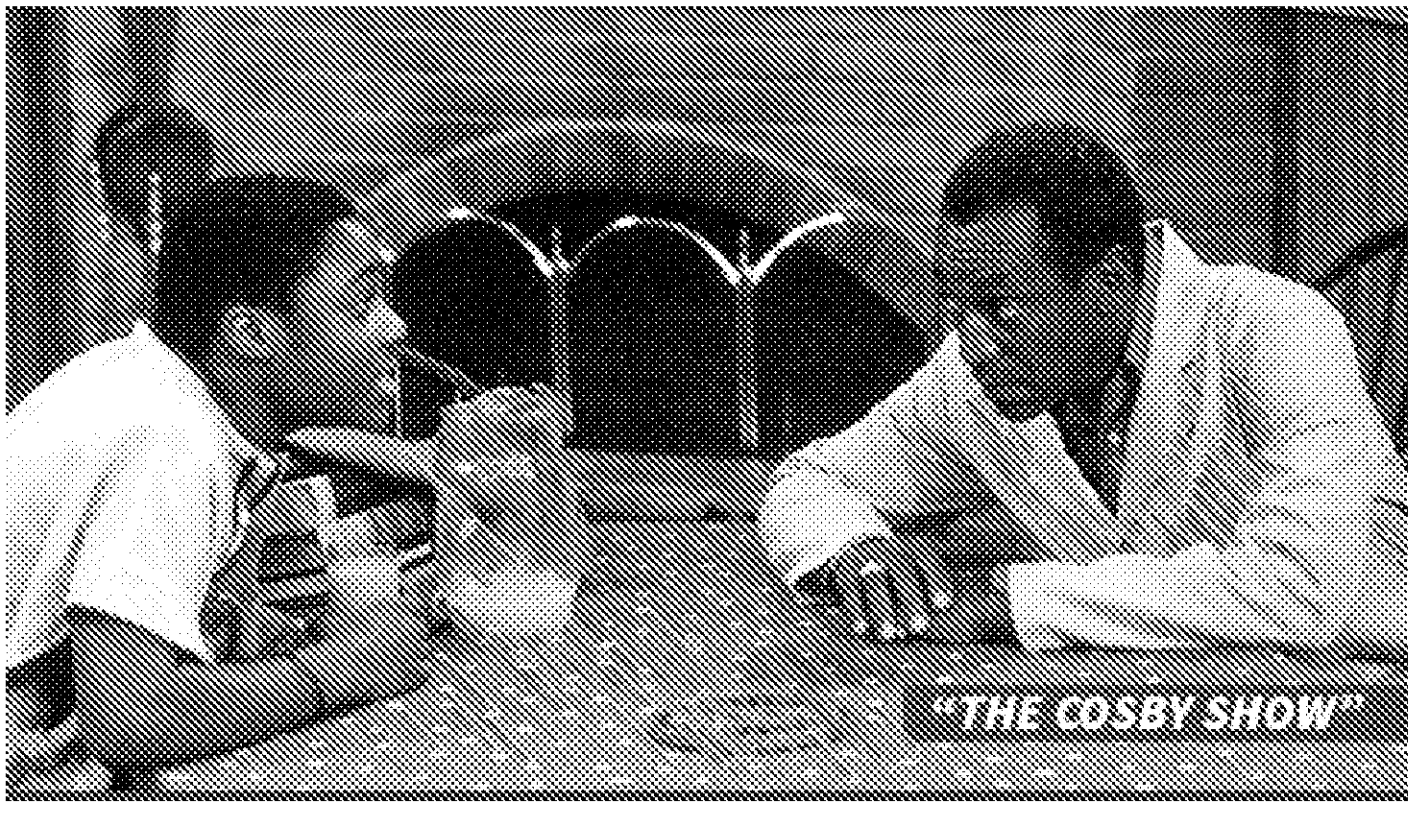
breaking news

Malcolm-Jamal Warner weirdly groused his greatest sorrow over the Bill Cosby sex scandal is the legacy of the show.

Warner said in an interview, "My biggest concern is when it comes to images of people of color on television and film, no matter what ... negative stereotypes of people of color, we've always had "The Cosby Show" to hold up against that. And the fact that we no longer have that, that's the thing that saddens me most because in a few generations the Huxtables will have been just a fairy tale."

He did say he felt sorry for the women whom Cosby allegedly victimized. But his overriding concern seems to be the show.

Different strokes ...



The Cosby show - Funny moment with Theo Huxtable

See also

- Bill Cosby -- Chloe Goins Sues ... He's a 'Serial Rapist'
- Damon Wayans Taking Heat -- Some of Cosby's Accusers 'Un-Rapable' (VIDEO)
- Bill Cosby -- I Got My Quaaludes from a Gynecologist

See More:

Bill Cosby , Malcolm-Jamal Warner , TV , 1 More Stars In Heat Hide these

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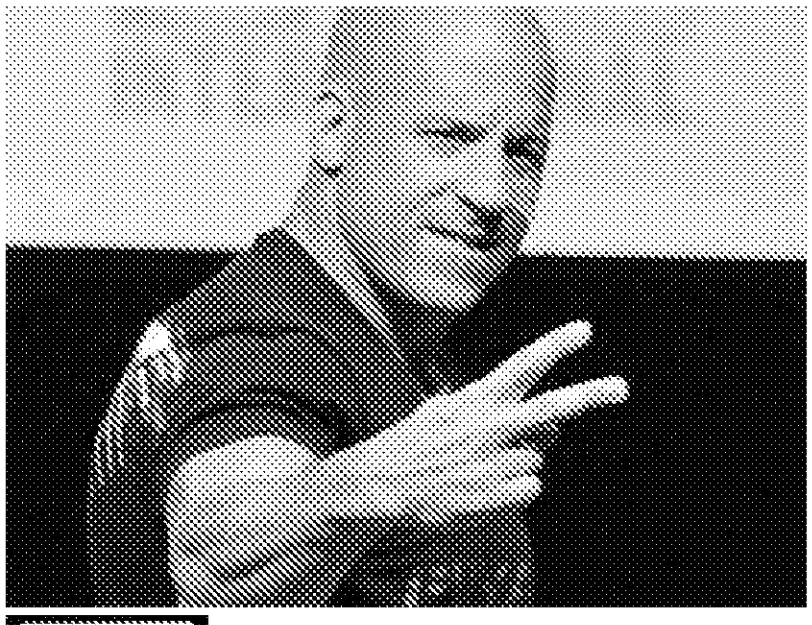
In other news...

Vin Diesel's SHOCKING Transformation

Vin Diesel does **NOT** look like this anymore!

SEE MORE »



FOX 47

Bella Thorne

Legal Cleavage

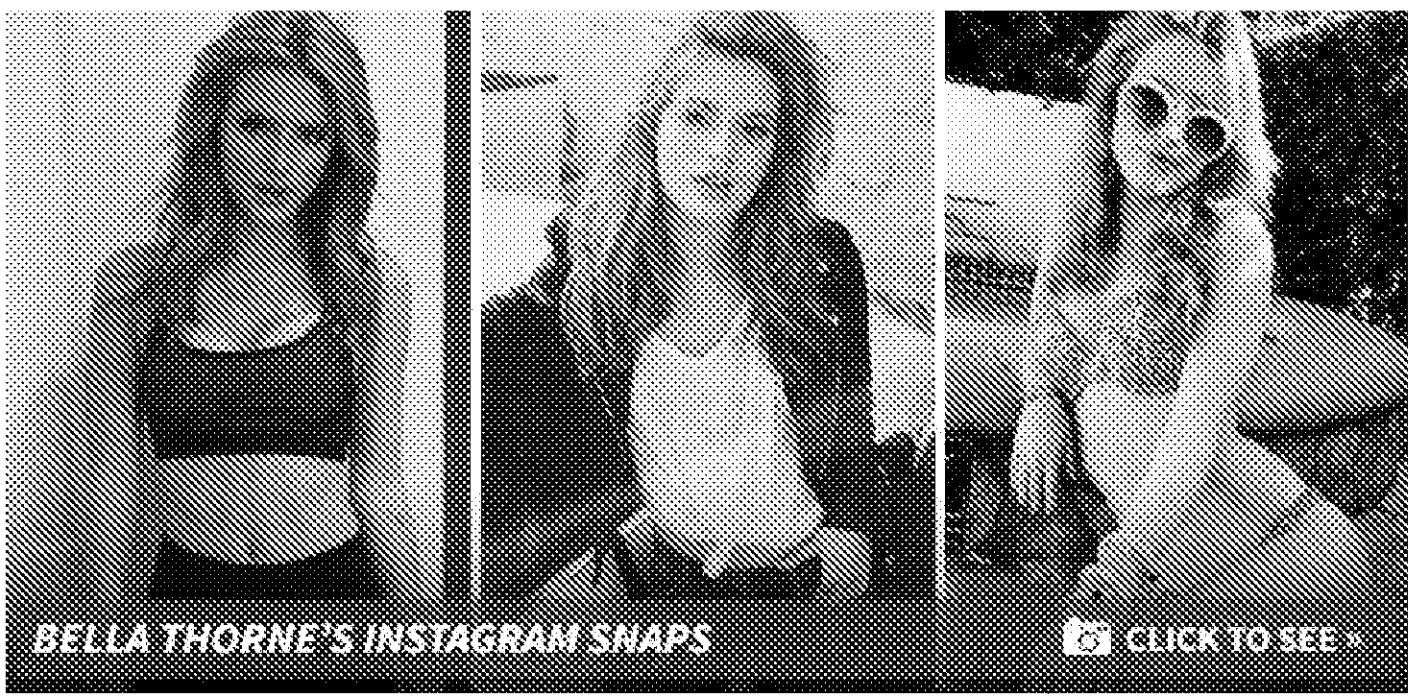
... For 18th Birthday Party

10/9/2015 5:50 AM PDT BY TMZ STAFF

AKM-GSI **Bella Thorne** was bound to have a blast on her 18th birthday -- and so was her chest.

Bella showed up at Beso Restaurant in Hollywood ... sporting leather (mini-skirt) and a laced up top ... to celebrate adulthood with friends.

Her 23-year-old BF **Gregg Sulkin** was also there, because while it was Bella's big night ... it was **even bigger for him**. Just guessin'.



Instagram

See also

- Bella Thorne -- I Finally Made it to London After 'Plane Crash' (PHOTO)
- Disney Star Bella Thorne -- 17-year-old Shakin' Up Very Big Money
- Bella Thorne to Miley Fans -- Patrick Schwarzenegger and I Are Just Friends, I Swear!!! (PHOTO)

See More:

Bella Thorne , Paparazzi Photo , Celebrity Boobs Hide these

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In other news...

Rosie Shares Cryptic Message After Daughters Shocking Interview

People were **VERY CONFUSED** after Rosie O'Donnell posted a **bizarre** message after her daughter's 'heartbreaking' interview.

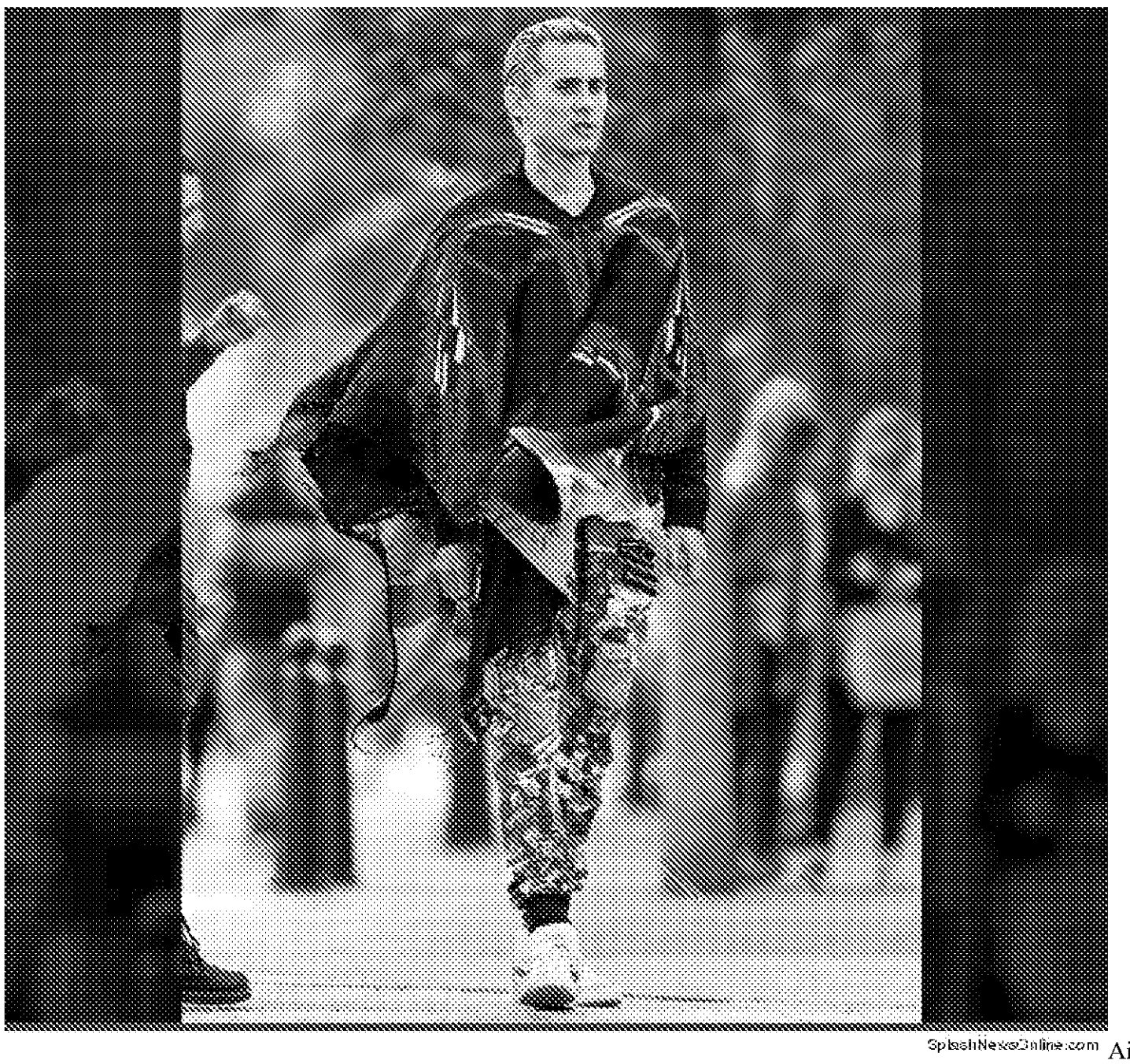
SEE MORE »

US MAGAZINE.COM

Jared Leto

Tasting the Rainbow ...

10/9/2015 6:53 AM PDT BY TMZ STAFF



SplashNewsOnline.com

Ain't always pretty, but **Jared Leto** wears whatever the hell he wants, and it looks good ... on him. Usually.

Leto was cruising around NYC, still sporting a pink 'do ... which we're guessing is left over from shooting "**Suicide Squad**."

Based on the multi-colored pants and poncho, someone might have raided the wardrobe trailer.

Suicide Squad - Comic-Con First Look [HD]

See also

- 'Suicide Squad' -- Oh Yeah ... Batman Is Definitely In It! (PHOTO)
- Jared Leto -- Wait'll They Get a Load Of Me ... As The Joker! (PHOTO)
- Batman -- I Got Your Bulge Right Here (PHOTO)

See More:

Jared Leto , Paparazzi Photo , Fashion , 1 More Movies Hide these

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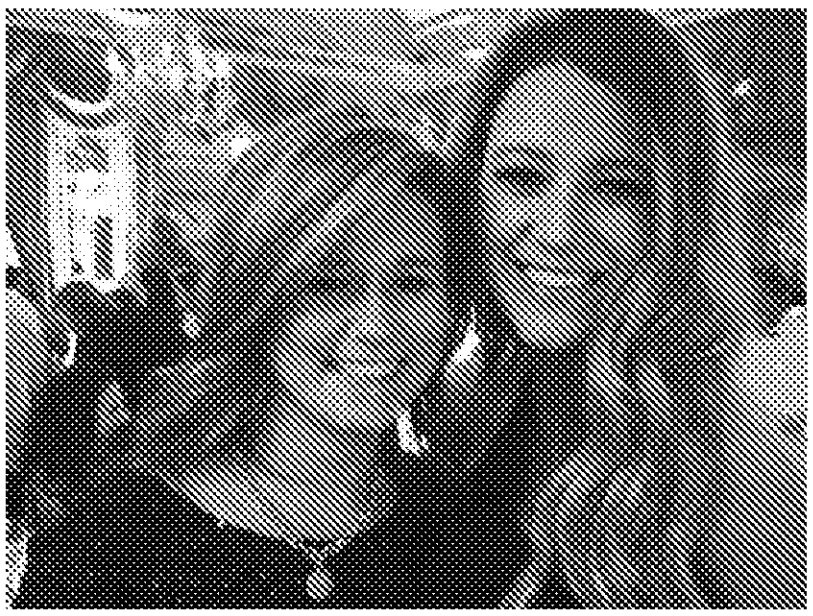
- 81 Comments

In other news...

Blake Lively's Brand New Look (BYE BYE HAIR)

Blake Lively steps out with a brand new look. She's chopped off her signature locks for a **CURLY BOB**!

SEE MORE »



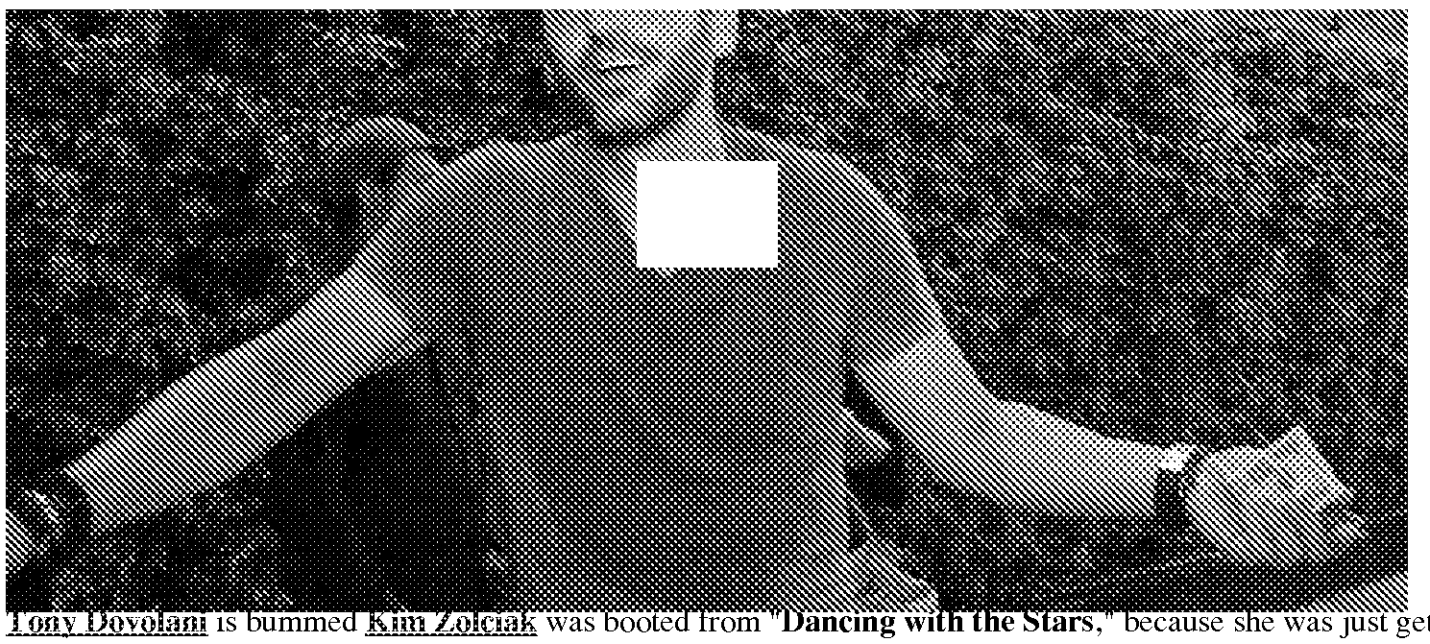
Tony Dovolani

Sweaty and Bummed

Over 'DWTS' Booting Kim

10/9/2015 6:47 AM PDT BY TMZ STAFF

RULES ARE RULESTMZ.com



Tony Dovolani is bummed Kim Zolciak was booted from "**Dancing with the Stars**," because she was just gettin' good.

Tony was at Eva Longoria's restaurant Beso in Hollywood -- drenched from a dance festival inside celebrating Latin music -- when he conceded she probably should have been disqualified for missing a show, despite the fact she had a stroke.

KIM ON 'DWTS'ABC

See also

- Kim Zolciak -- Returning To 'DWTS' For Final Dance
- Kim Zolciak -- Blindsided!! 'Dancing with the Stars' Pulls the Plug After Mini-Stroke
- Kim Zolciak -- No Show Tonight on 'Dancing With the Stars'

See More:

Tony Dovolani , Kim Zolciak , Dancing with the Stars Hide these

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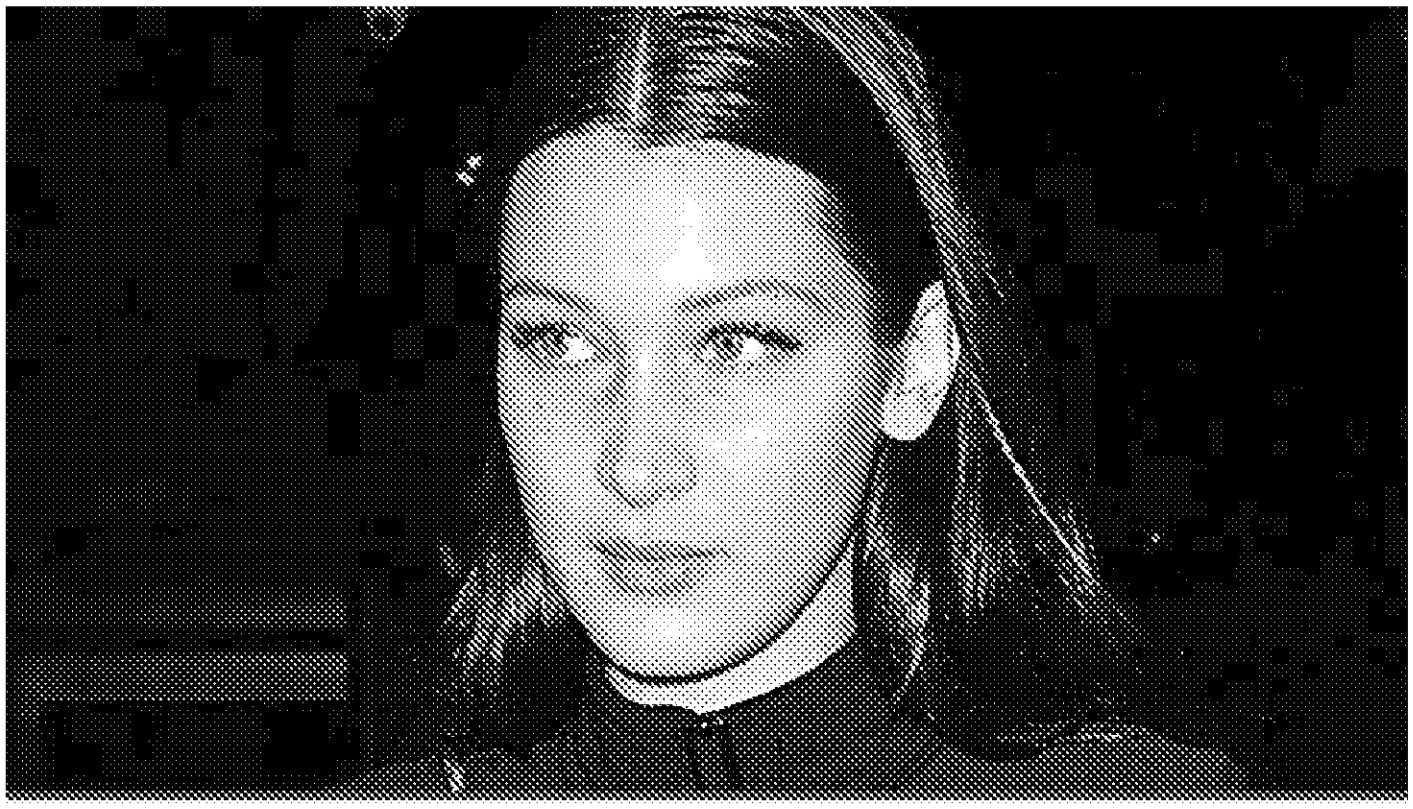
Bella Hadid

Suffered from Lyme Disease

In Silence

10/9/2015 3:53 AM PDT BY TMZ STAFF

breaking news



Getty **Bella Hadid** and her brother **Anwar** have both suffered from Lyme disease ... the same disease her mother **Yolanda Foster** has battled for several years ... and almost no one knew until Thursday night.

Yolanda revealed her children were plagued by the same tickborne, often debilitating disease she's battled. Yolanda, who has been **hospitalized for prolonged periods**, said, "When my 2 youngest children, Bella and Anwar, were diagnosed with chronic Lyme disease in early 2012, watching my babies struggle in silence in order to support me in my journey, struck the deepest core of hopelessness inside of me."

Yolanda made the announcement when she received the "Power of One" award in NYC.

See also

- Yolanda Foster -- I Removed My Leaky Breast Implants
- Gigi & Bella Hadid -- A Pair of Bums (PHOTOS)
- 'Real Housewives' Daughter Busted for DUI

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Bella Hadid , Yolanda Foster , Kids , 3 More Nurse! , Reality TV , Family Hide these

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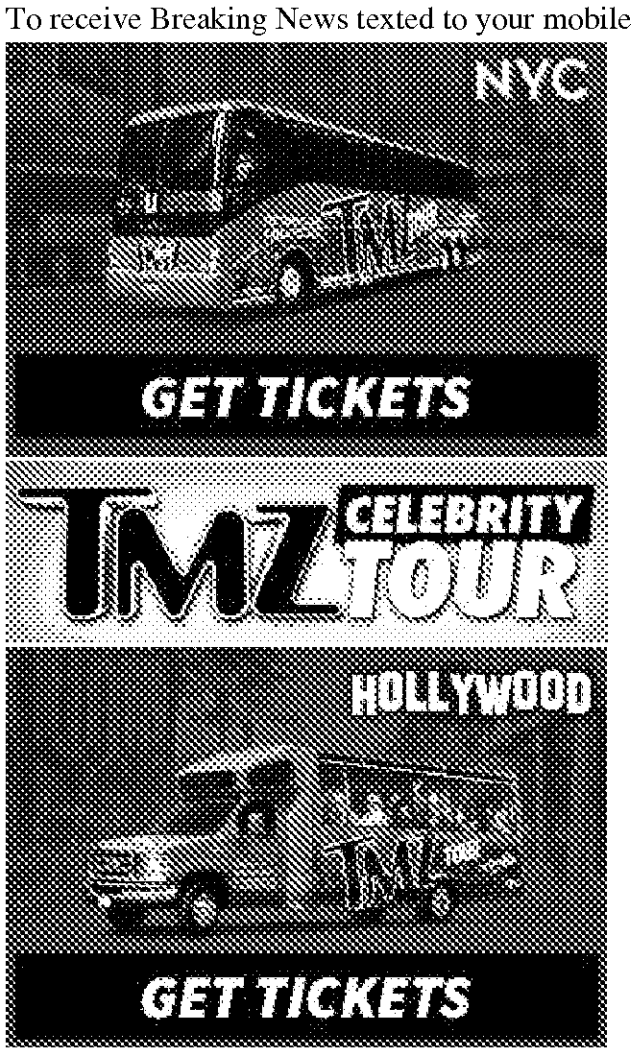
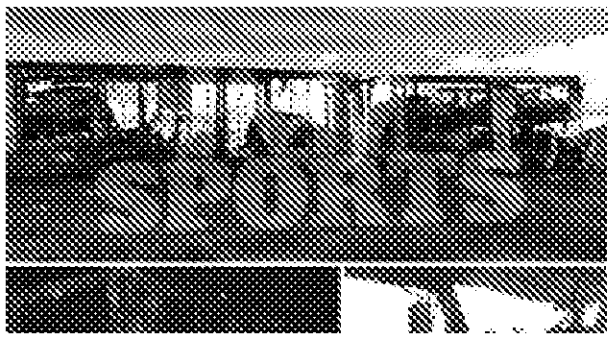


TMZ Sports



Floyd Mayweather
4 Expensive Cars Up In Flames
... In Trailer Fire

Floyd Mayweather's pricey car collection took a massive hit this week -- when a trailer transporting Floyd's Bentley and 2 Rolls Royce whips burned down to the ground ... TMZ Sports has…

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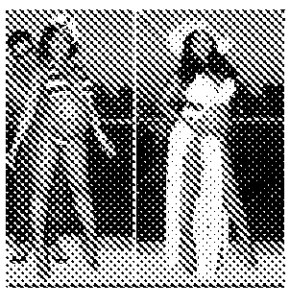
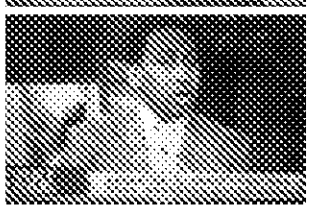
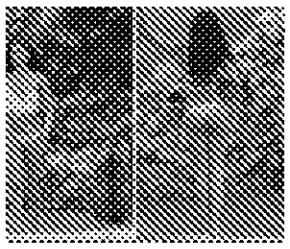
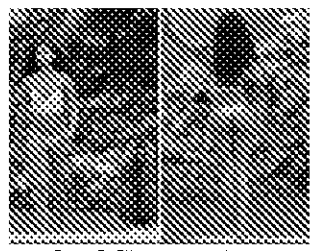
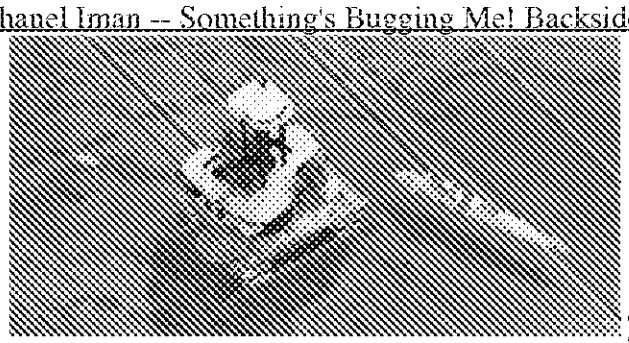


Benzino Baby Ready to BUST Out of Ex 'Love and Hip Hop' Star Althea Eaton (PHOTO) a day ago tmz.com HuffingtonPost.com (AOL) TMZ Staff TMZ Staff

- 2. Demi Lovato -- Here's What I look Like Naked (VIDEO) 6 days ago tmz.com HuffingtonPost.com (AOL) TMZ Staff TMZ Staff
- 3.  Stephen A. Smith -- Threatens Kevin Durant ... I CAN RUIN YOU!!! 4 days ago tmz.com HuffingtonPost.com (AOL) TMZ Staff TMZ Staff

Chanel Iman -- Something's Bugging Me! Backside Bitten Severely (PHOTOS) a week ago tmz.com TMZ.com TMZ Staff TMZ Staff

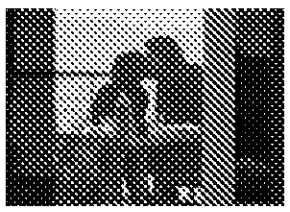
- 5.  This man-made private island has a penthouse, helipad, and shark-feeding station 5 days ago syndication.dtcn.com Digital Trends DigitalTrends.com Jenny McGrath Jenny McGrath (sponsored) private island

by Gravity

Most Commented

Amanda Knox Killing It At Karaoke

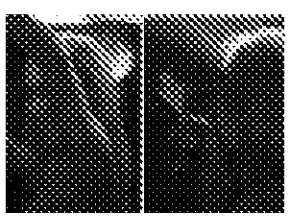
5/13/2015 | 10:19 AM PDT


Jim Carrey
Left Door Open For Future with GF

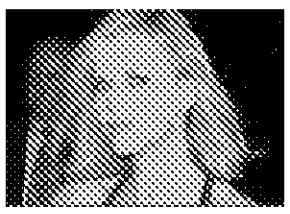
10/4/2015 | 2:59 PM PDT

'Mexican Madonna' Gloria Trevi
I'd Give Trump a Second Chance But Only If ...

10/7/2015 | 3:56 PM PDT


Madonna's Daughter Lourdes
Drinking At Mom's Concert Because ... Well, Her Mom's Freakin' Madonna!

10/3/2015 | 2:35 PM PDT


Charlize Theron's Alleged Stalker
Won't Be Flowered With Charges

10/6/2015 | 5:01 PM PDT

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UCLA Punter
Arrested On Suspicion of Rape

10/9/2015 | 11:44 AM PDT

Ryan Mallett's Dad
Our Family's Hurt Over Criticism 'His Grandmas Cry'

10/9/2015 | 11:00 AM PDT

NBA's 'Booby' Gibson
Barnes Was Right To Punch Fisher ... I'd Have Done The Same

10/9/2015 | 9:55 AM PDT

Diddy's Baby Mama
BLASTS DEREK FISHER 'Trifling, Trifling, Trifling'

10/9/2015 | 8:40 AM PDT

NBA's Thabo Sefolosha Not Guilty In NYC Cop Clash

10/9/2015 | 7:12 AM PDT

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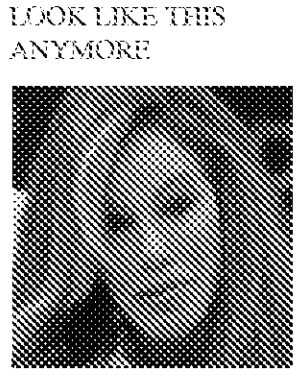
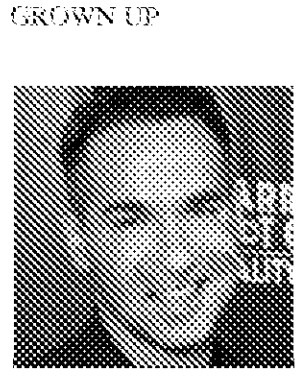
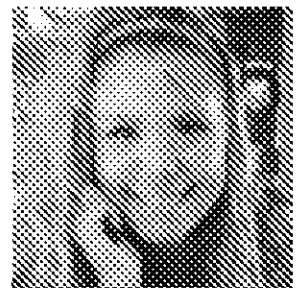
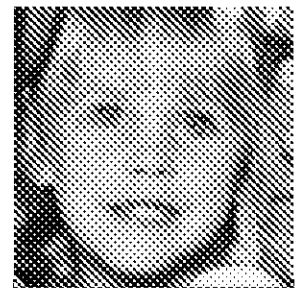
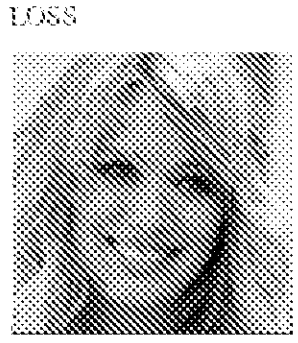
EVA LONGORIA'S TV DAUGHTER IS ALL GROWN UP


MELISSA RIVERS' EVER-CHANGING FACE

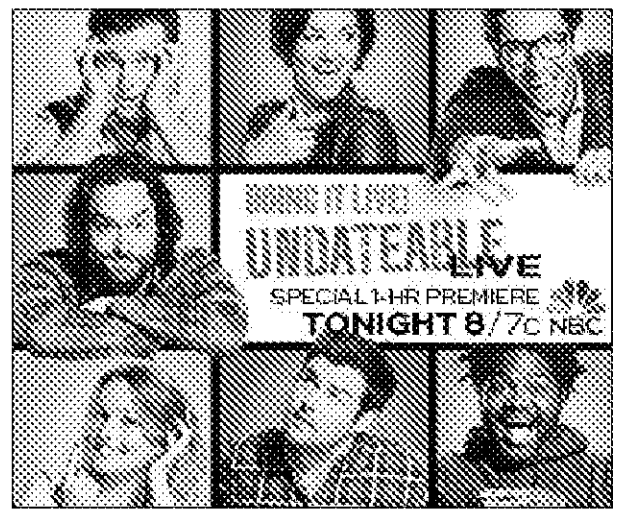

WHAT THE SITUATION REALLY THINKS ABOUT HIS FORMER CAST MATES


'TEEN MOM 2' STAR KAILYN LOWRY SHOWS OFF IMPRESSIVE WEIGHT LOSS

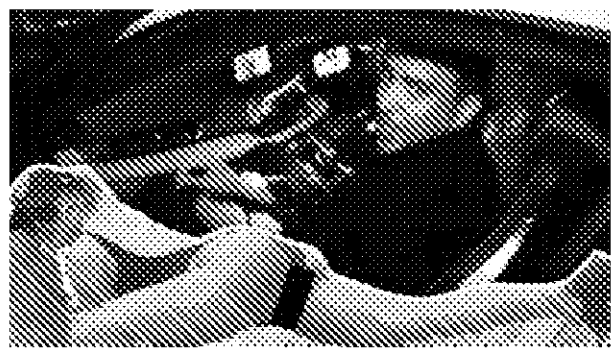

LITTLE TABITHA STEPHENS HAS GROWN UP A LOT OVER THE YEARS


HILARY DUFF FINALLY REVEALS WHAT WENT WRONG IN HER MARRIAGE

MIRANDA LAMBERT HASN'T HELD BACK SINCE DIVORCE



TMZ ON TV



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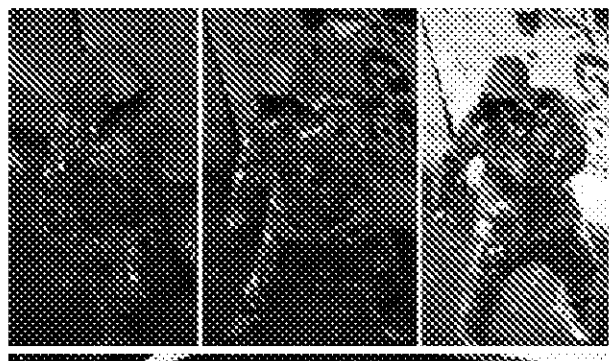
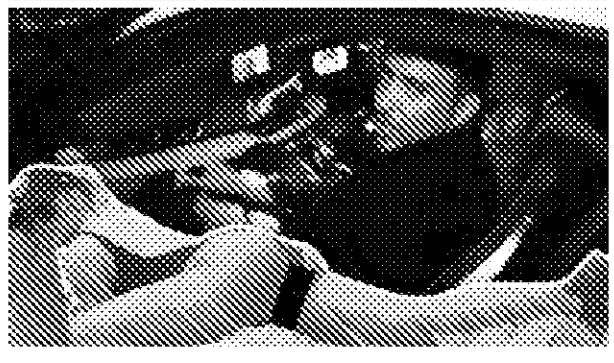
TMZ TV CLIPS

-  Missy Elliott Is Back!
-  French Montana Wants Khloe Back!
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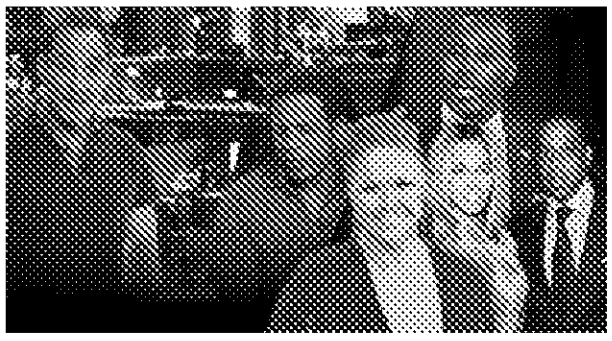
TMZ LIVE!

TMZ Live: Jay Z & Beyonce: Movin' On Up to Swanky Beverly Hills Mansion



HERE'S THE RUNDOWN Ben Carson Doesn't Backtrack from His Controversial Comments A Rap Group is Under Fire for a Scary Gun Video The 'Maze Runner' Controversy Takes a Weird Twist Ashley Benson's Controversial Halloween Costume

- Tuesday's
- TMZ Live: Rihanna: Opens Up about…
- Monday's
- TMZ Live: Amber Rose: Wiz &…
- Friday's
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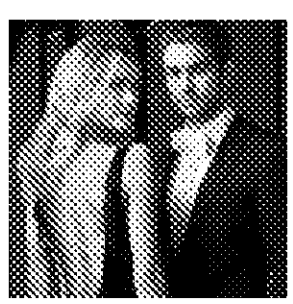
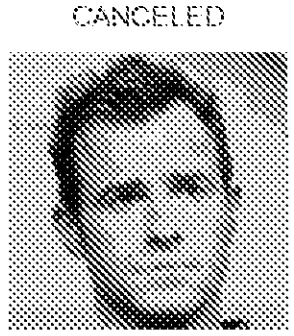
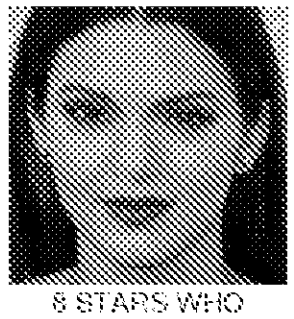


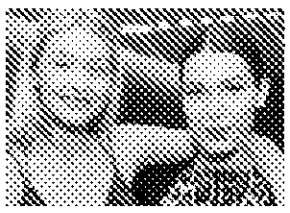
9 FALL TV SHOWS THAT WILL GET CANCELED

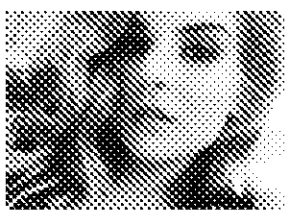


JUSTIN THEROUX IS FURIOUS OVER BRAD PITT'S WEDDING GIFT



8 STARS WHO TREAT WAITERS LIKE THEY'RE TRASH


Gigi and Bella Hadid At War Over Modeling Gigs?


Jojo's "MTV Cribs" House Tour Was All A Big Lie

Emma Stone Licking People and eating money

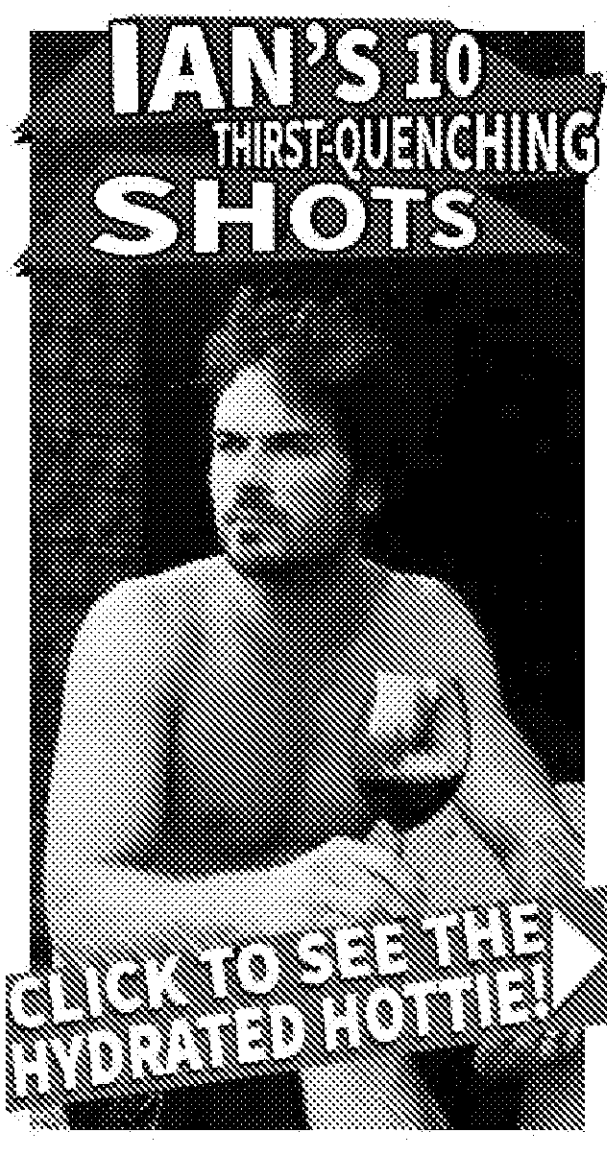
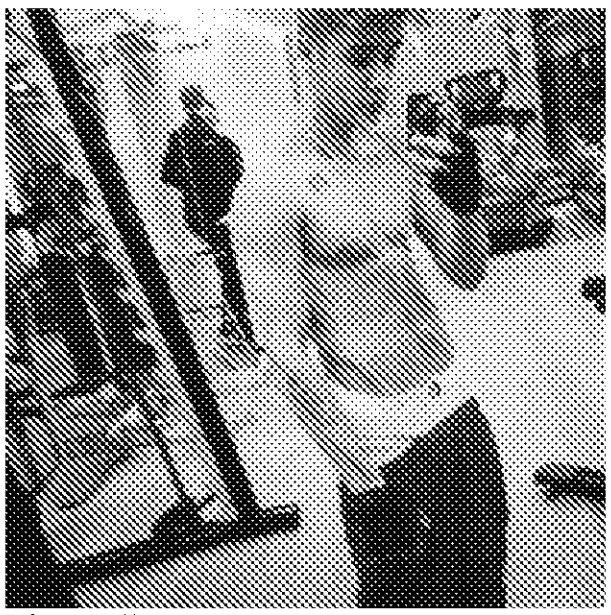


PHOTO GALLERY

Justin Bieber's Nearly Naked Photos!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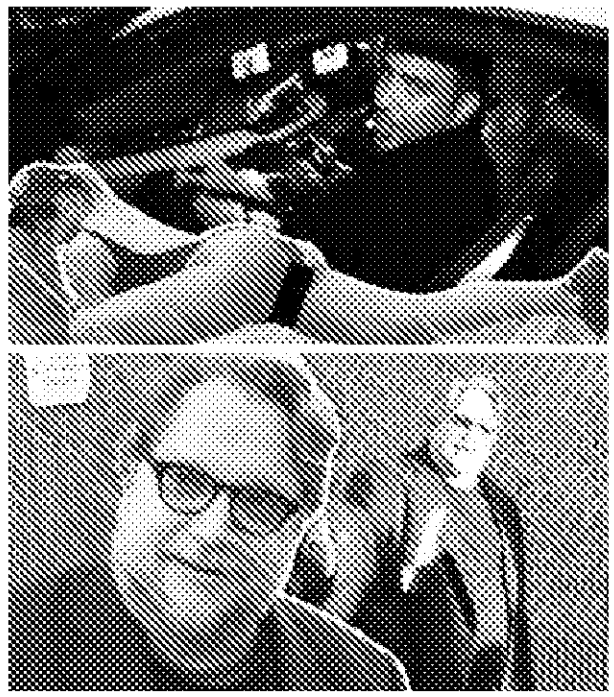
- 
TMZ On TV Full Episode: Thursday 10/08/15
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Director Guillermo Del Toro: Who's The Greatest Villain?
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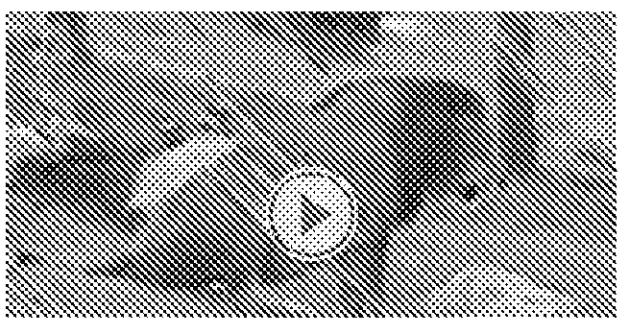
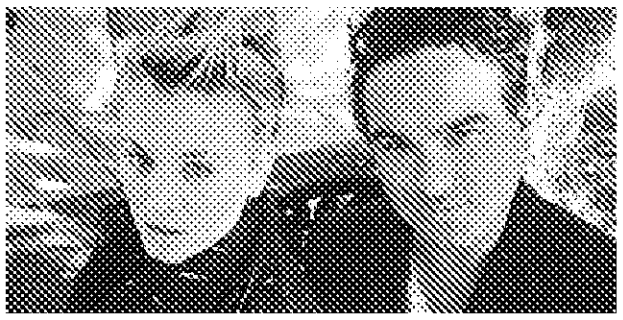


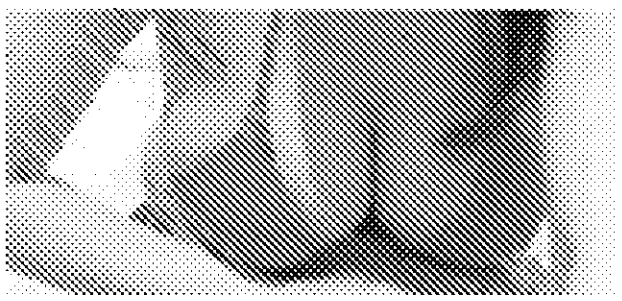
Freed circus lion touches grass for the first time and it will melt your heart [video]

theBERRY



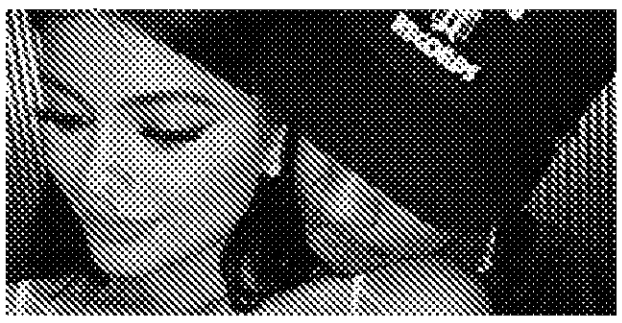
Kaley Cuoco: Cheating on Ryan Sweeting with Johnny Galecki?!

The Hollywood Gossip



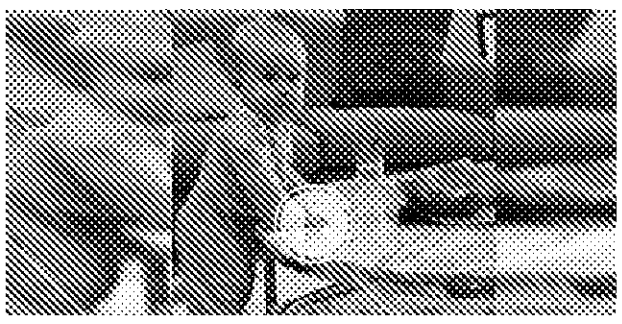
Daily Tuna

Hollywood Tuna



Kendall Jenner on Tyga and Kylie Jenner: Gross!

The Hollywood Gossip



Baby hilariously tests his mom's patience [video]

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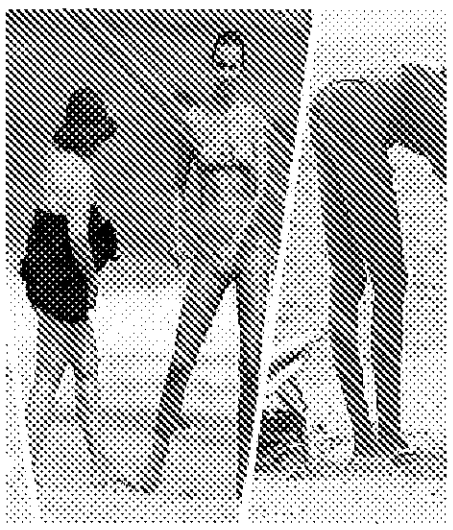
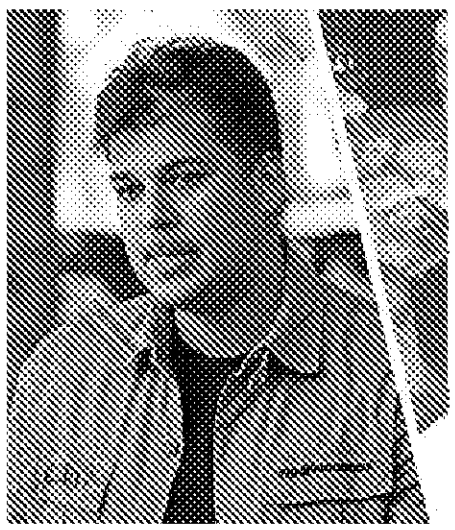


BRADLEY COOPER'S GIRLFRIEND SHOWS OFF HE...



ROB KARDASHIAN IS SKINNY ... ISH

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- Raven-Symone in trouble over name discrimination controversy
- Brad Paisley thankful for Ashley Madison hacking scandal

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- Finally it's Friday! Get away to see some fall foliage this long weekend (20...
- There Are Sexy Chivers Among Us (84 Photos)
- As if we needed another reason to hate Floyd Mayweather (Video)

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- Rick Moranis Explains Why He's Not Making a Cameo in the New 'Ghostbusters'
- Wenwen Yang Busty Asian Curves and Happy Balls

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- SHOCK PICS: Sports Illustrated SUPER SWIMSUIT MODEL Jessica White TAKES IT OFF . . . . . .
- COP Got KO'D!! Two Baltimore Police Officers HARASS Man . . . Stop And Detain Him...

US MAGAZINE.COM

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- Justin Bieber's Father Jeremy Jokes After Nude Photo Leak: I'm a "Proud...
- Ryan Seacrest Was Asked to Be His Sister's "Man of Honor" at Wedding: See...

gossip girl

- John Stamos To Be Charged With DUI Under the Influence of GHB!
- Khloe Kardashian's Best Friend Malika Haqq Arrested
- Who Is Justin Bieber's Rumored New Girlfriend Jayde Pierce?

JUST JARED

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- The 'Hail, Caesar!' Movie Trailer Has Too Many Stars to Count!
- Justin Bieber Debuts 'Purpose' Album Artwork - See All Three Versions Here

HUFFPOST ENTERTAINMENT

- Shepard Fairey (and His Art) Make the Jump From Covert to Overt
- Blessed Are the Risk Takers
- John Goodman Reveals Weight Loss At Movie Premiere

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