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CASE NO: A-21-837173-C
Department 20

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10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

13 STEFAN WILHELMY, an individual; and
14 PEARADISE, LLC, a Nevada limited
15 liability company;

16 Plaintiffs,

17 vs.

18
19 KIMBERLY ANN HAUETER and JOHN
20 DOE HAUETER, wife and husband;
21 ALEJANDRA JAVIER and JOHN DOE
22 JAVIER, wife and husband; SAVANNAH
23 BROWN and JOHN DOE BROWN, wife
24 and husband; MONICA SANDU and JOHN
25 DOE SANDU, wife and husband; SADIE
26 PAISLEY DOE AND JOHN DOE
27 PAISLEY, wife and husband; DOE
28 DEFENDANTS I-X, INCLUSIVE; AND
ROE DEFENDANTS I-X, INCLUSIVE.

Defendants.

Case No. _____
Department: _____

**COMPLAINT AND
APPLICATION FOR
INJUNCTIVE RELIEF**

(Defamation, False Light Invasion
of Privacy, Intentional Interference
with Prospective Economic
Advantage, Intentional Interference
with Contractual Relations, Aiding
and Abetting, Conspiracy,
Declaratory Judgment)

JURY TRIAL REQUESTED

ARBITRATION EXEMPT

1 Comes Now Plaintiffs, Stefan Wilhelmy and Pearadise, LLC, by and through
2 counsel, and as and for their causes of action against the above-named Defendants,
3 and each of them, hereby respectfully complains, alleges, and states as follows:
4

5 **PARTIES, JURISDICTION AND VENUE**

6 1. Plaintiff, Stefan Wilhelmy (“Wilhelmy”) is a natural person, and a
7 resident of the State of Nevada, and operates the TikTok account located at
8 <https://www.tiktok.com/@bbwpearadise>.
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10 2. Plaintiff, Pearadise, LLC (“Pearadise”) is a Nevada limited liability
11 company, which owns and operates an interactive online discussion forum called
12 “Pearadise Discord” on Discord. Discord is an online social platform where people
13 can form an online community of common interests and interact via text chat,
14 images, and video¹.
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17 3. Defendant Kimberly Ann Haueter is also known as “Piggy Stardust” on
18 the social application TikTok and owns or operates the TikTok account located at
19 https://www.tiktok.com/@piggy_stardust (“Kimberly”).
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22 4. Defendant Alejandra Javier is also known as “Ally” and
23 “Allyjayylovee” on the social application TikTok and owns or operates the TikTok
24 account located at <https://www.tiktok.com/@allyjayylovee> (“Ally”).
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¹ Discord is located online at the following URL: <https://discord.gg/pearadise>.

1 5. Defendant Savannah Brown is also known as “Savy” and “Sleepthroat”
2 on the social application TikTok and owns or operates the TikTok account located
3 at <https://www.tiktok.com/@sleepthroat> (“Savannah”).
4

5 6. Defendant Monica Sandu Brown is also known as “Monikaaahlv” on
6 the social application TikTok and owns or operates the TikTok account located at
7 <https://www.tiktok.com/@monikaaahlv> (“Monica”).
8

9 7. Defendant Sadie Paisley (“Sadie”) DOE’s true identity is unknown, but
10 upon information and belief, she owns and operates the TikTok account located at
11 <https://www.tiktok.com/@peardiseistoxicaf>, owns and operates the Gmail account,
12 sadiepaisley98@gmail.com, and owns and operates the cell phone number, “720-
13
14 329-0575”.
15

16 8. Upon information and belief, Defendants have published false and
17 defamatory content on the Internet about the Plaintiff, as specifically described
18 herein.
19

20 9. Upon information and belief, Defendant Monica lives in Las Vegas,
21 Nevada, and the remaining Defendants purposefully availed themselves of the
22 benefits of Nevada law because, as identified herein, each Defendant’s specific
23 interactions with or within the forum relating to the causes of action pled gives rise
24 to their contacts with Las Vegas, Nevada.
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1 10. Kimberly and Sadie directed her defamatory statements online about
2 Plaintiffs towards Plaintiffs' Pearadise Discord and its community headquartered in
3 Las Vegas, and against Wilhelmy and his TikTok account (bbwpearadise), with full
4 knowledge that Plaintiffs are located in Las Vegas, and with the intent to damage
5 Plaintiffs' reputations in Las Vegas.
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8 11. Ally and Savannah published defamatory statements online about
9 Plaintiffs related to their physical visit with Plaintiffs in Las Vegas, alleging that
10 certain events occurred during their visit in Las Vegas, with full knowledge that
11 Plaintiffs are located in Las Vegas, and with the intent to damage Plaintiffs'
12 reputations in Las Vegas.
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15 12. The true names or capacities, whether individual, corporate, associate
16 or otherwise of Defendants DOE INDIVIDUALS I through X and ROE BUSINESS
17 ENTITIES I through X, inclusive, are unknown to Plaintiffs who therefore sues said
18 Defendants by such fictitious names. Plaintiffs are informed and believe and thereon
19 alleges that each of the Defendants designated herein as a DOE or ROE is
20 responsible in some manner for the events and happenings herein referred to and
21 caused injury and damages proximately thereby to the Plaintiffs as alleged herein;
22 that Plaintiffs will ask leave of this Court to amend this Complaint to insert the true
23 names and capacities of said DOE and ROE defendants, inclusive, when same have
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1 been ascertained by Plaintiffs, together with appropriate charging allegations and to
2 join such Defendants in this action.

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4 13. That the amount in controversy herein exceeds the jurisdictional
5 requirements of this Court.

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7 14. Plaintiffs are informed and believe, and on that basis alleges, that
8 jurisdiction and venue are proper in this Court.

9 **FACTS**

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11 15. Plaintiffs reallege and incorporate by reference all of the allegations
12 contained within the paragraphs above and below as though fully set forth herein.

13
14 16. Plaintiff Wilhelmy is the founder of Pearadise and the Pearadise
15 Discord community, an online group which is an anti-body shaming and anti-
16 bullying community for women and men who are overweight (i.e., “big, beautiful,
17 women” aka “BBW”), and provides a safe and friendly atmosphere online and in-
18 person, where people of all genders, races, and sizes can feel comfortable with their
19 bodies and explore common interests.
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21

22 17. On or about December of 2020, Defendants Savannah and Ally began
23 communicating with Plaintiff Wilhelmy through Pearadise Discord, and eventually
24 they both befriended him, and engaged in communications on Instagram and/or
25 TikTok.
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1 18. Defendants Savannah and Ally both decided that they wanted to meet
2 Wilhelmy at his home in Las Vegas from April 8, 2021 through April 19, 2021 (when
3 Ally left) and through April 20, 2021 (when Savannah left) (collectively the “Visit”),
4 as part of their desire to engage with the Pearadise BBW community.
5

6 19. Leading up to the Visit, there was a lot flirting and sexually charged
7 texts between Wilhelmy and Defendants (the “Text Messages”).²
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9 20. Wilhelmy and Defendant Ally had been engaging in sexually charged
10 texts in February of 2021.
11

12 21. Wilhelmy and Defendant Savannah had been engaging in sexually
13 charged texts in March of 2021.
14

15 22. Thereafter, Defendants Savannah and Ally visited Wilhelmy and stayed
16 with him at his 5-bedroom home in Las Vegas, Nevada (the “Visit”). Each
17 Defendant had their own bedroom.
18

19 23. Wilhelmy had met Defendant Ally once before the Visit, and she had
20 hugged and kissed him at that time.
21

22 24. Based on the Text Messages, conduct leading up to the Visit, and
23 conduct during the Visit, Ally and Savannah impliedly consented to Wilhelmy
24 touching them. Additionally, Wilhelmy had reason to believe that both Defendants
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² Plaintiff’s Exhibit Appendix to Complaint and Application for Injunctive Relief, Exhibit A

1 Ally and Savannah were *interested* in pursuing a physical relationship, or at the very
2 least, *interested* in physical contact with Plaintiff.

3
4 25. For example, on at least one occasion during the Visit, the Defendants
5 were naked with Wilhelmy, and other individuals, in his hot tub at his home.

6
7 26. During the Visit, on April 9, 2021, Wilhelmy touched Defendant Ally
8 briefly on the stomach over her shirt, when she was laying down on his sofa, with
9 no reaction one way or the other by Ally. This encounter is documented and
10 preserved on Plaintiff's surveillance camera system.

11
12 27. During the Visit, on April 9, 2021, Defendant Savannah, while laying
13 down on the sofa, reached her hand out to Wilhelmy, who was walking past her, to
14 engage with him physically, she touched and held his hand and brought Wilhelmy
15 to within kissing distance of her face and they briefly hugged.

16
17 28. Wilhelmy then removed a TV remote from behind Savannah's back,
18 and then Wilhelmy gently and playfully taps her buttocks twice with no reaction one
19 way or the other by Savannah. This encounter is also documented and preserved on
20 Plaintiff's surveillance camera system.

21
22 29. During the Visit, there were only two (2) incidents when Wilhelmy
23 touched Savannah. It was only after the second touch that Savannah requested
24 Wilhelmy to no longer touch her, and Wilhelmy complied with her request.
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1 30. At no point during the entire Visit did either Ally or Savannah accuse
2 Wilhelmy of non-consensual touching or sexual assault, and instead continued to
3 stay with Wilhelmy in his home for no less than 10 more days.
4

5 31. In fact, 9 days after Savannah left Las Vegas, she stated in a group chat
6 that she had a dream wherein she, Wilhelmy, and three other girls had sex together
7 – and that “basically it was an orgy”.³
8

9 32. Weeks after the Visit, however, instead of resolving any purported
10 issues directly with Wilhelmy, both Ally and Savannah took to TikTok in order to
11 accuse Wilhelmy of sexual assault.
12

13 33. Defendants Savannah and Ally then conspired with another BBW
14 community member, Defendant Kimberly, to damage Plaintiffs’ reputations online.
15

16 34. On or about May 26 or 27, 2021, Defendant Ally published false and
17 defamatory statements about Plaintiffs on her TikTok account, affirming Kimberly’s
18 false accusation of sexual assault:
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- 20 a. Ally stated that Kimberly’s false and defamatory statements were true,
21 and that Wilhelmy had “no consent over any part of my body (not even
22 my belly fat).”
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³ Plaintiff’s Exhibit Appendix to Complaint and Application for Injunctive Relief, Exhibit B

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b. Ally specifically points to the duet-styled TikTok post wherein Kimberly (aka Piggy) states that “Stefan, you have now sexually assaulted people”.

(collectively “Ally’s False Statements”).

35. On or about May 28, 2021, Defendant Savannah posts a “Trigger Warning” video on TikTok of text messages with a third party. Although no names were mentioned, she asks if there was consent to someone with no additional context provided.

36. On or about May 28, 2021, Defendant Savannah posts the following false statements on TikTok as part of a series of posts:

- a. Post - “Me exposing a predator”;
- b. Post - “...seeing all my assaulter’s fans coming to my page”;
- c. Video about Defendant Savannah’s alleged sexual assault experience (part 1);
- d. Video about the text Defendant Savannah sent just before the Visit purporting a lack of consent (part 2);
- e. Video about three alleged non-consensual touching incidents – Wilhelmy touching her waist when going out for sushi; Wilhelmy massaging her shoulders; Wilhelmy “slapping” her buttocks on more

1 than one occasion, which she calls sexual assault; and Savannah claims
2 she said “stop” on each occasion (part 3);

3
4 f. Video about how the next morning after being naked in the pool
5 together, that Wilhelmy came into her room and rubbed her stomach
6 after she objected to it (part 4);

7
8 g. Video claiming that Wilhelmy grabbed her by the shoulders non-
9 consensually and looked into her eyes, and attempted to open her
10 bedroom door when she was “waxing” (part 5);

11
12 h. Savannah then claims that there was another victim who had a
13 boyfriend and who stated that she was not going to do anything
14 physical, and despite this Wilhelmy wanted to “test the waters” with
15 them both anyway, despite their alleged lack of consent to the same.
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17
18 (collectively “Savannah’s False Statements”).

19 37. Defendants Ally and Savannah also published each of their respective
20 False Statements to Defendant Kimberly, with the objective of spreading the False
21 Statements and causing Plaintiffs substantial harm to their reputations.
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23 38. Starting on or about May 26, 2021, Defendant Kimberly published a
24 series of videos on TikTok that contain the following false and defamatory
25 Statements:
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- a. That Wilhelmy committed sexual assault against at least two members of the BBW community.
- b. That Plaintiffs do not provide a “safe” environment for women.
- c. That Wilhelmy is a “predator”.

(collectively “Kimberly’s False Statements”).

39. Moreover, after Plaintiffs, by and through counsel, requested Kimberly to cease and desist her defamation campaign, Kimberly published the email containing Wilhelmy’s full name, taunted Plaintiffs, and unequivocally stated that she would not stop publishing the false statement that Wilhelmy committed sexual assault.

40. Defendant Sadie has published the following false and defamatory statements about the Plaintiffs on TikTok (collectively, the “Sadie False Statements”), images of which are attached in Plaintiff’s Exhibit Appendix to Complaint and Application for Injunctive Relief, Exhibit C:

- a. "He [Stefan] SA [sexually assaulted] 2 girls and all these sheep are standing up for him". Wilhelmy did not sexually assault anyone; this is false.
- b. During one of Wilhelmy's TikTok live streams, one of his supporters asked to show proof that Wilhelmy is guilty, and Sadie's response during the live stream, was that "piggy_stardust [Defendant Kimberly

1 Ann Haueter] has videos of it [sexual assault]". Wilhelmy did not
2 sexually assault anyone, and claiming that there are videos of it is also
3 false.
4

5 c. During another TikTok live stream, Wilhelmy was defending his
6 reputation against the false accusations, and Sadie published the
7 following statements: "Here is him proving that he has zero proof and
8 that it's just eyewitnesses...", and "I'M SCREEN RECORDING THIS
9 KEEP LYING". Claiming that Wilhelmy is lying about not sexually
10 assaulting two women, and that he did sexually assault two girls at his
11 home, and that he has "zero proof", are all false statements.
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15 41. When Plaintiffs' counsel emailed Sadie to cease publishing her
16 defamatory statements, Sadie demonstrated her true colors by sending four highly
17 offensive and inappropriate emails to counsel, stating that she will not stop, that she
18 published more videos, and accused Wilhelmy of impersonating a lawyer. A
19 complete and accurate copy of Sadie's emails are attached images of which are
20 attached in Plaintiff's Exhibit Appendix to Complaint and Application for Injunctive
21 Relief, Exhibit D. Sadie's emails included, in part, the following response:
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Y'all are dumb af for sure it's not illegal to post public stuff. So come serve me papers to my face or stop being a fake ass keyboard warrior.

Also fuck you you can't tell me what I can and can't post online. Lmao it's all true it's literally his face in the videos saying the shit he does.

So stop telling these girls to stop lying because in reality your shitty ass job ain't gonna stop proof mother fucker.

Contact me again and you'll hear from my lawyer who isn't a cheap ass shitty public defender type so good luck.

And go to hell!!! Cunt!!! I reactivated my account so eat shit

42. Sadie also stated that her mother “is the president of [B]entonville home office for Walmart...[y]ou make shitty car parts... also my dad is a lawyer a REAL lawyer not some made up shit.”

43. Monica has published the following false and defamatory statements about Wilhelmy on her TikTok account: That the allegations of sexual assault are not “allegations” because they are true, and there are texts and screen shots in videos to “prove” it happened; this is false.

1 44. Monica also published the private contact information of the producer
2 for the reality TV series that Wilhelmy has an agreement with, with the intent that
3 other Defendants interfere with said agreement.
4

5 45. Each Defendants' respective False Statements above are collectively
6 referred to below as the "False Statements."
7

8 46. The accusations that Wilhelmy committed sexual assault and that
9 Pearadise is therefore unsafe and is predatory are false and defamatory, and is
10 defamation *per se* under Nevada law.
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12 47. Under Nevada law, the applicable law where the alleged incident
13 occurred, "sexual assault" requires sexual penetration, and no such penetration ever
14 occurred with any of the Defendants, ever.
15

16 48. Defendants have also attempted to intentionally interfere with a
17 pending deal that Plaintiff Wilhelmy has with producers for a reality television show
18 ("Deal").
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20 49. Plaintiff has signed preliminary agreements for the Deal.
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22 50. On April 21, 2021, Plaintiff Wilhelmy signed a talent agreement
23 ("Agreement") to be "in consideration for participation in" a television docuseries
24 ("Program").
25

26 51. The Agreement states that the Program is "intended for initial
27 exhibition by a US television network," such as TLC.
28

1 52. Defendants have discussed Plaintiff's Deal and have encouraged others
2 to try and cancel the Program and to interfere with Plaintiffs' Deal, and to "let them
3 producers know (if we need to) that he's lying about his 'relationship' and 'family'
4 for the show."

6 53. The statements also include the producer's name and business so others
7 can contact the producer and interfere with Plaintiff's Deal.
8

9 54. As a result of Defendants' defamation, Plaintiffs suffered significant
10 reputational harm and embarrassment, including but not limited to, having lost
11 members within the Pearadise Discord community, humiliating inquiries from
12 members of the BBW community, and has had people inquire specifically about the
13 accusations made by Defendants that have ruined Plaintiffs' reputations.
14

16 55. Wilhelmy has significantly limited his engagement on social media
17 since the allegations were made and has lost "gifts" (donations on TikTok) from not
18 performing live on TikTok and has distanced himself from the BBW community
19 since the allegations were made.
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22 56. Many of Wilhelmy's 170,000 followers on TikTok have been asking
23 about the False Statements made by the Defendants. Wilhelmy has been responding
24 to them one by one informing them that the allegations are simply untrue, but
25 Wilhelmy has had an extremely difficult time doing so, given the sensitivity of the
26 "MeToo" movement and general concerns with sex assault not being taken seriously.
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COUNT I
DEFAMATION AND DEFAMATION PER SE
(Against All Defendants)

57. Plaintiffs reallege and incorporate by reference all of the allegations contained within the paragraphs above and below as though fully set forth herein.

58. The False Statements made by Defendants are about and concerning Plaintiffs.

59. Without privilege, Defendants communicated the False Statements to third parties via the Internet and/or intentionally made such statements on the Internet, which were accessible to third parties.

60. The False Statements bring Plaintiffs into disrepute, contempt, or ridicule.

61. Given the manner in which the False Statements were published, it is evident that the False Statements have been published to third parties with malice, spite, or ill will and with the intent of causing harm to the reputation and economic interests of Plaintiffs.

62. The False Statements published by Defendants impeach the honesty, integrity or reputation of Plaintiffs.

63. The False Statements made by Defendants constitute defamation per se and general damages are presumed as a matter of law.

1 64. In making and publishing the False Statements, Defendants had
2 knowledge of or acted in reckless disregard as to the falsity of the False Statements.

3 65. Defendants published the False Statements knowing that they would be
4 widely disseminated and result in pecuniary loss, as well as irreparable harm.
5

6 66. As a direct and proximate result of Defendants posting the False
7 Statements, Plaintiffs have sustained, and will continue to sustain, immediate and
8 irreparable harm and injury including, but not limited to, damage to reputation,
9 losses in revenues, loss of profits, loss of goodwill, loss of business relations with
10 existing and future business prospects, and loss of competitive business advantage,
11 opportunity, and/or expectancy.
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15 67. As a direct and proximate cause of the conduct by Defendants, Plaintiff
16 Wilhelmy has suffered, and will continue to suffer, humiliation, extreme emotional
17 distress, anxiety, depression, stomach aches, headaches, lack of sleep, lack of a
18 desire to eat, emotional pain and suffering, anguish, and loss of self-esteem.
19

20 68. Upon information and belief, Plaintiffs have suffered a direct pecuniary
21 loss as the result of the publication of the False Statements.
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23 69. Plaintiffs have suffered significant general and/or special damages in
24 an amount well in excess of \$1,000,000, given the egregious allegations of sexual
25 assault.
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1 70. Plaintiffs are informed and believe, and on that basis alleges, that the
2 conduct of the Defendants was intentional, guided by evil motives and done willfully
3 and maliciously toward Plaintiffs, and with conscious intent to harm and disregard
4 for their rights. Plaintiffs' injuries were intensified by the malicious conduct of
5 Defendants. Defendants' conduct justifies an award of exemplary and punitive
6 damages.
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10 **COUNT II**
11 **APPLICATION FOR PERMANENT INJUNCTION**
12 **(Against All Defendants)**

13 71. Plaintiffs reallege and incorporate by reference all of the allegations
14 contained within the paragraphs above and below as though fully set forth herein.

15 72. As a direct and proximate result of the Defendants posting the False
16 Statements, and interference with Wilhelmy's Deal, Plaintiffs have sustained, will
17 imminently sustain, and/or will continue to sustain, immediate and irreparable harm
18 and injury including, but not limited to, damage to reputation, losses in revenues,
19 loss of profits, loss of goodwill, loss of business relations with existing and future
20 business prospects, and loss of competitive business advantage, opportunity, and/or
21 expectancy.
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24 73. The False Statements made by Defendants impeach the honesty,
25 integrity or reputation of Plaintiffs and Plaintiffs' services.
26

27 74. The False Statements made by Defendants are defamatory on their face.
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1 75. There is a substantial risk that unless Defendants' wrongful acts
2 described herein are permanently enjoined, Defendants will continue to irreparably
3 injure Plaintiffs.
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5 76. Plaintiffs have no adequate remedy at law; therefore, Plaintiffs are
6 entitled to injunctive relief.
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8 **COUNT III**
9 **FALSE LIGHT INVASION OF PRIVACY**
10 **(Against All Defendants)**

11 77. Plaintiffs reallege and incorporate by reference all of the allegations
12 contained within the paragraphs above and below as though fully set forth herein.
13

14 78. In making and publishing the False Statements, specifically, that
15 Wilhelmy committed sexual assault and that Pearadise is not a community that is
16 safe because of Wilhelmy's alleged predatory conduct, Defendants caused Plaintiffs
17 to be portrayed out of context and in false light.
18

19 79. The False Statements are about and concerning Plaintiffs.
20

21 80. Defendants caused the False Statements to be widely disseminated to
22 third parties via the Internet.
23

24 81. Defendants' False Statements are and would be highly offensive to a
25 reasonable person and have been published to third parties with the apparent intent
26 of causing harm to the reputation and economic interests of Plaintiffs.
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1 82. In making and publishing the False Statements, Defendants had
2 knowledge of or acted in reckless disregard as to the falsity of the False Statements
3 and the false light in which Plaintiffs would be placed.
4

5 83. The False Statements pose a direct and immediate threat to Plaintiffs'
6 personal and business relationships.
7

8 84. In making and publishing the False Statements, Defendants acted
9 maliciously, willfully, wantonly, and unlawfully.
10

11 85. For such willful and malicious acts, Plaintiffs seek punitive damages in
12 addition to actual damages.
13

14 86. Defendants' acts, omissions, conduct and transactions alleged herein
15 were aggravated, outrageous, and guided by evil motives wherein Defendants
16 intended to harm Plaintiffs and/or consciously pursued a course of conduct knowing
17 that it created a substantial risk of significant harm to Plaintiffs.
18

19 87. To dissuade Defendants from pursuing a similar course of conduct in
20 the future and to discourage other persons from similar conduct in the future, an
21 award of punitive damages should be awarded against Defendants in the sum of
22 sufficient magnitude to punish Defendants and to deter similar conduct by others.
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26 **COUNT IV**
27 **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC**
28 **ADVANTAGE**
 (Against All Defendants)

1 88. Plaintiffs reallege and incorporate by reference all of the allegations
2 contained within the paragraphs above and below as though fully set forth herein.

3 89. Based on the Agreement between Wilhelmy and a television producer,
4 Plaintiffs have a prospective contractual relationship with a third party for a pending
5 Deal.
6

7 90. As evidenced by the context of their False Statements, Defendants were
8 aware of Wilhelmy's prospective business relationships and the Deal.
9

10 91. Without privilege or justification, Defendants published the False
11 Statements and encouraged others to call the producers regarding the False
12 Statements for the specific purposes of interfering with Wilhelmy's prospective
13 business relationships and preventing the Deal to come to fruition.
14

15 92. As a direct and proximate result of Defendants' wrongful conduct,
16 Wilhelmy is on the verge of losing out on a very lucrative television deal.
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18 93. As a direct and proximate result of Defendants' wrongful conduct,
19 Wilhelmy has or will have suffered damages in an amount to be proven at trial.
20

21 94. But for Defendants' wrongful conduct, Wilhelmy would not be in
22 danger of losing his current and prospective business relationships.
23

24 95. There is a substantial risk that unless Defendants' wrongful acts
25 described herein are enjoined, including, but not limited to, the continued publication
26 of the False Statements, Defendants' misconduct will continue to irreparably injure
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1 Wilhelmly. Therefore, Wilhelmly has no adequate remedy at law, and the Court
2 should grant the injunctive relief sought by Wilhelmly accordingly.

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4 **COUNT V**
5 **INTENTIONAL INTERFERENC WITH CONTRACTUAL RELATIONS**
6 **(Against All Defendants)**

7 96. Plaintiffs reallege and incorporate by reference all of the allegations
8 contained within the paragraphs above and below as though fully set forth herein.

9 97. Wilhelmly has a valid and existing contract with a television producer
10 to be considered for a lucrative reality television show.

11
12 98. As evidenced by the context of their False Statements, Defendants were
13 aware of Wilhelmly's contract with the television producer to be considered for the
14 Program.

15
16 99. Defendants intentionally published False Statements about Wilhelmly
17 and have conspired to reach out to the producer to disrupt the contractual relationship
18 and prevent the Wilhelmly from being considered for the Program.

19
20 100. Upon information and belief, Defendants unlawful conduct has already
21 jeopardized or imminently will jeopardize the realization of the Wilhelmly's
22 consideration for the Program.

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25 101. As a direct and proximate result of Defendants posting the False
26 Statements, Wilhelmly has sustained, and will continue to sustain, immediate and
27 irreparable harm and injury including, but not limited to, loss in revenues, loss of
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1 profits, loss of business relations with existing and future business prospects, and
2 loss of competitive business advantage, opportunity, and/or expectancy.

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4 102. Upon information and belief, Plaintiffs have suffered a direct pecuniary
5 loss as the result of the publication of the False Statements.

6
7 103. Wilhelmy is informed and believes, and on that basis alleges, that the
8 conduct of the Defendants was intentional, guided by evil motives and done willfully
9 and maliciously toward Wilhelmy, and with conscious intent to harm and disregard
10 for his rights. Wilhelmy's injuries were intensified by the malicious conduct of
11 Defendants. Defendants' conduct justifies an award of exemplary and punitive
12 damages.
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15 **COUNT VI**
16 **AIDING AND ABETTING**
17 **(Against All Defendants)**

18 104. Plaintiffs reallege and incorporate by reference all of the allegations
19 contained within the paragraphs above and below as though fully set forth herein.

20
21 105. While aware of the falsity of the False Statements, Defendants provided
22 each other with substantial assistance and encouragement in publishing and widely
23 disseminating the False Statements and in interfering with Wilhelmy's contract
24 rights.
25

26 106. Defendants published the False Statements to defame and disparage
27 Plaintiffs and place Plaintiffs in false light and to interfere with his contract rights.
28

1 107. The Defendants have knowingly enabled each other to defame and
2 disparage Plaintiffs, to place Plaintiffs in false light, and to interfere with his contract
3 rights.
4

5 108. As a direct and proximate cause of the Defendants' conduct, Plaintiffs
6 have sustained, and will continue to sustain, immediate and irreparable harm and
7 injury including, but not limited to, damage to reputation, losses in revenues, loss of
8 profits, loss of goodwill, loss of business relations with existing and future business
9 prospects, and loss of competitive business advantage, opportunity, and/or
10 expectancy.
11

12 109. Defendants' conduct was intentional, malicious and done for the
13 purpose of causing injury to Plaintiffs.
14

15 110. For such willful and malicious acts, Plaintiffs seek punitive damages in
16 addition to actual damages.
17

18 111. Defendants' acts, omissions, conduct and transactions alleged herein
19 were aggravated, outrageous, and guided by evil motives wherein Defendants
20 intended to harm Plaintiffs and/or consciously pursued a course of conduct knowing
21 that it created a substantial risk of significant harm to Plaintiffs.
22

23 112. To dissuade Defendants from pursuing a similar course of conduct in
24 the future and to discourage other persons from similar conduct in the future, an
25
26
27
28

1 award of punitive damages should be awarded against Defendants in the sum of
2 sufficient magnitude to punish Defendants and to deter similar conduct by others.

3
4 **COUNT VII**
5 **CONSPIRACY**
6 **(Against All Defendants)**

7 113. Plaintiffs reallege and incorporate by reference all of the allegations
8 contained within the paragraphs above and below are hereby incorporated by
9 reference as though fully set out herein.

10 114. As evidenced by the manner in which the Defendants engaged in the
11 tortious conduct described herein, Defendants have knowingly agreed and conspired
12 to engage in the tortious conduct described herein.

13 115. As a direct and proximate result of the conduct of the Defendants,
14 Plaintiffs have been damaged in an amount to be determined at trial.

15 116. Defendants' conduct was intentional, malicious and done for the
16 purpose of causing injury to Plaintiffs.

17 117. For such willful and malicious acts, Plaintiffs hereby seeks punitive
18 damages in addition to actual damages.

19 118. Defendants' acts, omissions, conduct and transactions alleged herein
20 were aggravated, outrageous, and guided by evil motives wherein Defendants
21 intended to harm Plaintiffs and/or consciously pursued a course of conduct knowing
22 that it created a substantial risk of significant harm to Plaintiffs.
23
24
25
26
27
28

1 119. To dissuade Defendants from pursuing a similar course of conduct in
2 the future and to discourage other persons from similar conduct in the future, an
3 award of punitive damages should be awarded against Defendants in the sum of
4 sufficient magnitude to punish Defendants and to deter similar conduct by others.
5

6 **COUNT VIII**
7 **DECLARATORY JUDGMENT**
8 **(Against All Defendants)**

9 120. Plaintiffs reallege and incorporate by reference all of the allegations
10 contained within the paragraphs above and below as though fully set forth herein.
11

12 121. Plaintiffs desire to have the False Statements removed or redacted from
13 the above-referenced websites and/or social media platforms.
14

15 122. Having the False Statements removed or redacted by the websites
16 and/or online platforms is the only potentially viable ways to stop the continuing
17 harm being caused to Plaintiffs by the False Statements.
18

19 123. Pursuant to the Communications Decency Act, 47 U.S.C. § 230(c) (the
20 “CDA”), certain websites, like TikTok are not required to remove defamatory
21 content, even if presented with a court order deeming the content to be defamatory.
22

23 124. Additionally, certain websites, like TikTok, will not permit the
24 publisher of the defamatory statements to remove the statements, unless certain
25 conditions are met.
26

27 125. Certain websites, like TikTok may voluntarily agree to remove or
28

1 redact defamatory content when presented with a judgment or court order declaring
2 the content to be false and defamatory.

3
4 126. The rights, status, and legal relations of the parties are affected by the
5 dispute described herein.

6
7 127. Pursuant to the Uniform Declaratory Judgments Act, N.R.S. §§ 30.010
8 to 30.160, Plaintiffs seek declaratory judgment finding that the False Statements are
9 false and defamatory.

10
11 **WHEREFORE**, Plaintiffs pray for judgment and relief against Defendants
12 as follows:

13
14 A. For a permanent injunction enjoining Defendants from publishing any
15 False Statements about Plaintiffs on the Internet and to any third party by any other
16 means and from interfering with Wilhelmy's contractual rights;

17
18 B. For a permanent injunction requiring Defendants to remove the False
19 Statements that the Defendants published or caused to be published on the Internet
20 about Plaintiffs, to the extent the Defendants are not precluded from doing so by the
21 applicable website;

22
23 C. For declaratory judgment finding that the False Statements are false and
24 defamatory;

25
26 D. For general damages to be proven at trial in an amount in excess of
27 \$1,000,000.00;
28

- 1 E. For special damages in an amount to be proven at trial;
- 2 F. For punitive damages, including damages under N.R.S. 42.005;
- 3 G. For Plaintiffs costs herein incurred;
- 4
- 5 H. For prejudgment and post judgment interest on all damages at the
- 6 highest rate allowed by law from the date of injury until paid in full; and
- 7

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1 I. For such other and further relief as the Court deems just and proper.

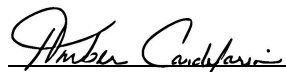
2 DATED this 30 day June, 2021.

3
4
5 **RM Warner, PLC**

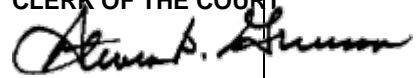
6
7
8 By:  _____

9 Raeesabbas Mohamed, Esq.
10 Arizona Bar #027413
11 8283 N. Hayden Rd., Suite 229
12 Scottsdale, AZ 85258
13 (480) 331-9397
14 Raees@RMWarnerLaw.com
15 *Pro Hac Vice Pending*

16
17
18 **CANDELARIA LAW GROUP, LLC**

19 By:  _____

20 Amber Candelaria, Esq.
21 Nevada Bar No. 09992
22 8275 S. Eastern Avenue, Suite 200
23 Las Vegas, NV 89123
24 (702) 706-7065
25 amber@candelarialawgroup.com
26 Attorneys for Plaintiff
27
28



1 **EXHB**

2 Raees Mohamed, Esq.
3 Arizona Bar #027413
4 RM Warner, PLC
5 8283 N. Hayden Rd., Suite 229
6 Scottsdale, AZ 85258
7 (480) 331-9397
8 Raees@RMWarnerLaw.com
9 *Pro Hac Vice Pending*

CASE NO: A-21-837173-C
Department 20

6 Amber Candelaria, Esq.
7 Nevada Bar #9992
8 Candelaria Law Group, LLC
9 8275 S. Eastern Avenue, Suite 200
10 Las Vegas, NV 89123
11 (702) 706-7065
12 amber@candelarialawgroup.com
13 Attorneys for Plaintiffs

11 DISTRICT COURT
12 CLARK COUNTY, NEVADA

14 STEFAN WILHELMY, an
15 individual; and PEARADISE,
16 LLC, a Nevada limited liability
17 company;

17 Plaintiffs,

18 vs.

19 KIMBERLY ANN
20 HAUETER and JOHN DOE
21 HAUETER, wife and
22 husband; ALEJANDRA
23 JAVIER and JOHN DOE
24 JAVIER, wife and husband;
25 SAVANNAH BROWN and
26 JOHN DOE BROWN, wife
27 and husband; MONICA
28 SANDU and JOHN DOE
SANDU, wife and husband;
SADIE PAISLEY DOE AND
JOHN DOE PAISLEY, wife
and husband; DOE

CASE NO.:

DEPT NO.:

**Exhibit Appendix to Complaint and
Application for Injunctive Relief**

1 DEFENDANTS I-X,
2 INCLUSIVE; AND ROE
3 DEFENDANTS I-X,
4 INCLUSIVE,
5 Defendants.

6 COMES NOW, Plaintiffs, by and through their attorney, Amber Candelaria,
7 Esq. of the Candelaria Law Group, and hereby submits their Exhibit Appendix as
8 follows:

9 Exhibit A. Text messages between Wilhelmy and Defendants.

10 Exhibit B. Group Text messages posted by Defendant Savannah.

11 Exhibit C. Tik Tok false and defamatory statements posted by Defendant Sadie.

12 Exhibit D. Copies of defendant Sadie's emails.

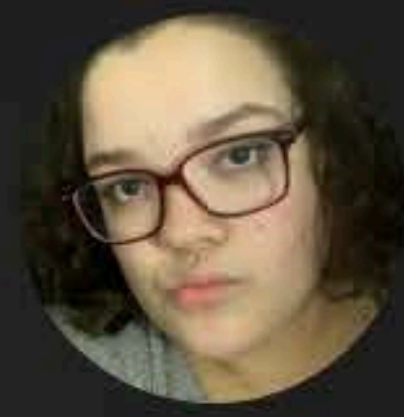
13 Dated this 29th day of June, 2021.

14 Submitted by:

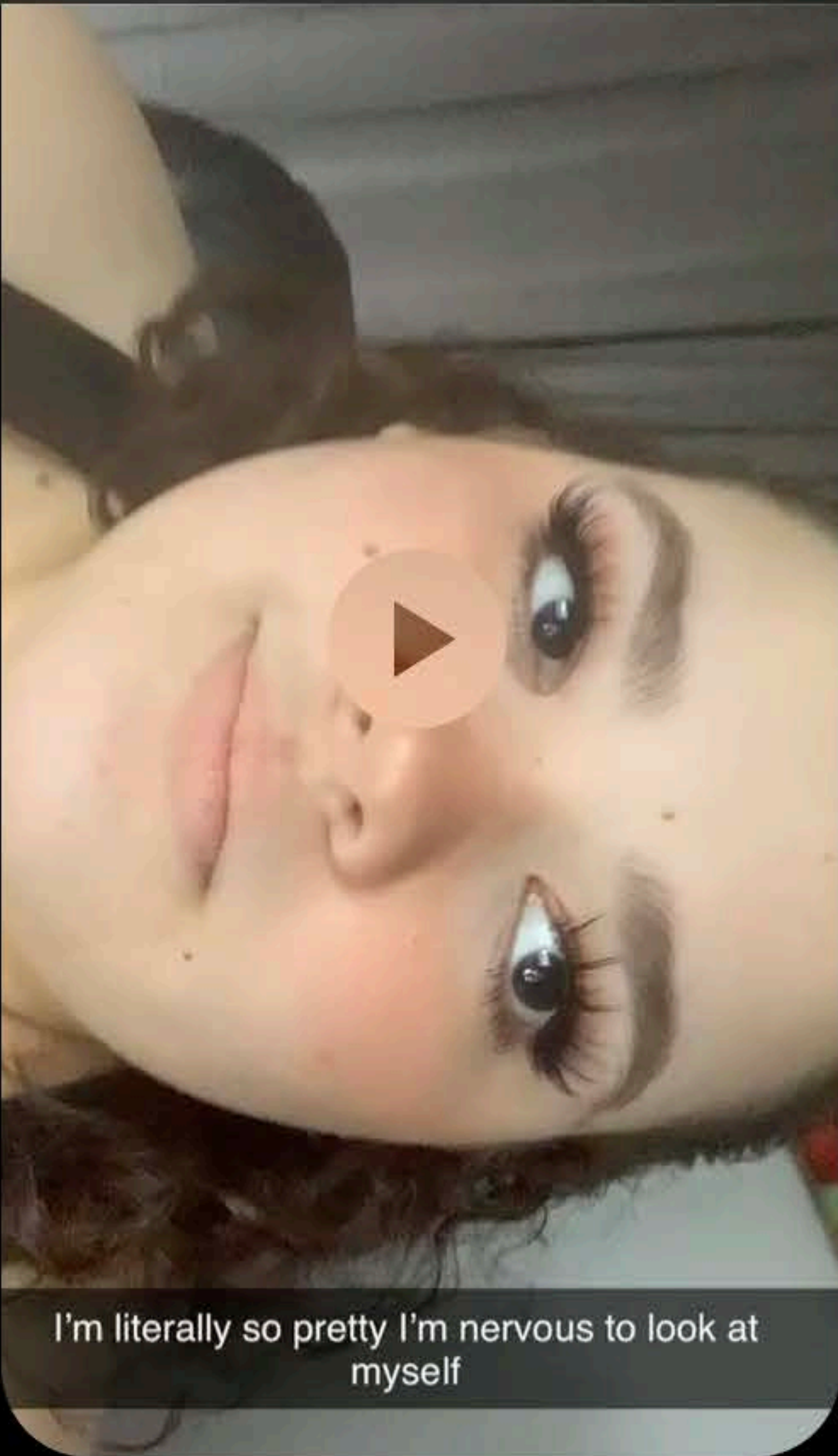
15 

16 Candelaria Law Group, LLC
17 Amber Candelaria, Esq.
18 Nevada Bar No. 09992
19 8275 S. Eastern Ave. Suite 200
20 Las Vegas, Nevada 89123
21 Attorneys for Plaintiffs
22
23
24
25
26
27
28

EXHIBIT A



TTZ Savannah >



👁️ you didn't see the makeup look the other day

Wow!!! 😲 😲

You just made my heart jump a bit 😲

But did it make you feel a little better? 💖

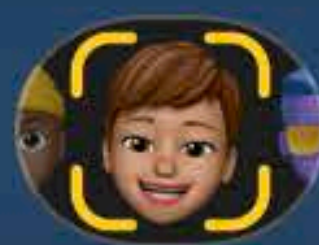
Yes

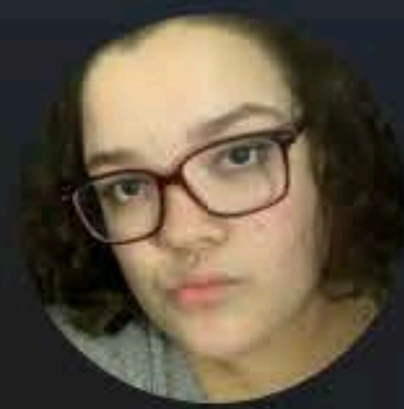
Thank you 💖💖

Good. That's all I wanted 😊💖



iMessage





TTZ Savannah >

I'm so horny 😞 I keep watching that video of Kass and wishing I was there 😞

Ohhhh Savy 😍

Me tooooo

Ally Kass and I are being naughty in Narnia

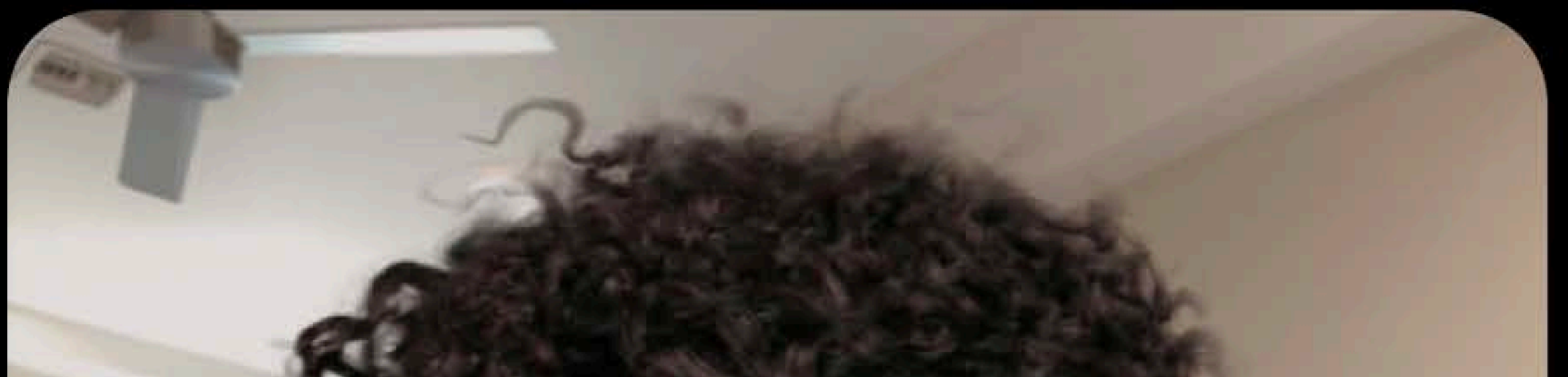


Oooooohhhh!!!!

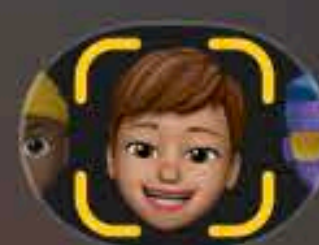
Thu, Feb 18, 14:43

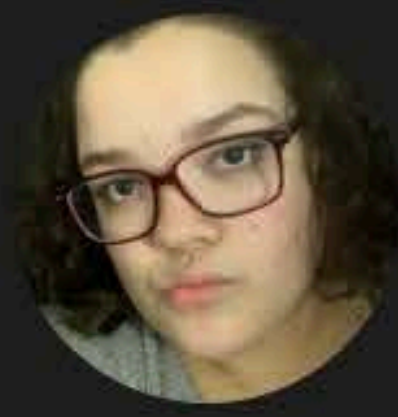
SavyyyyY!!!!!! Do you need a hug today? 😊

Thu, Feb 18, 16:13



iMessage





TTZ Savannah >

That's so sweeeeeeeet

I can't

Just being honest

Nobody says those things to me



You are next level beautiful

I don't even know what to say

I'm blushingggggg

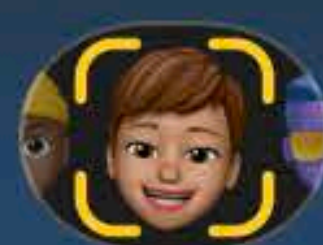
You Kass and ally are the most beautiful girls on the whole discord 💖 but I'd drop everything for you. I have to keep my feelings guarded to not hurt myself in the end 😊

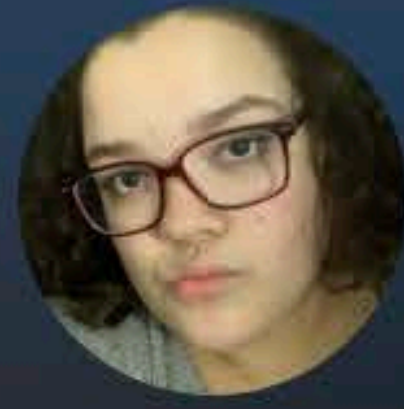
💖 I understand that

Sorry if this is too forward and too much 😬



iMessage





TTZ Savannah >

Sorry if this is too forward and too much 😳

Oh no it's not.



I feel so embarrassed now 😳

I really don't want you to feel embarrassed. Don't feel embarrassed about how you feel 😞

Sun, Feb 21, 17:45

Savvyyyy!!!! What's going on? 🤗 hugs!!

Depression

Awwww Sorry to hear that 😞 Wish I could give you a nice long hug

Mon, Feb 22, 13:47

Savvyyyy 🥰

Hey

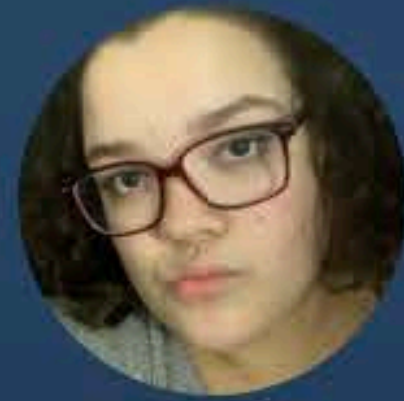
Camera, App Store, iMessage, Voice Recording icons

App Store, Apple Pay, Photos, Safari, Face ID, Clock, Health icons

18:15 ↗



◀ Contacts



TTZ Savannah >

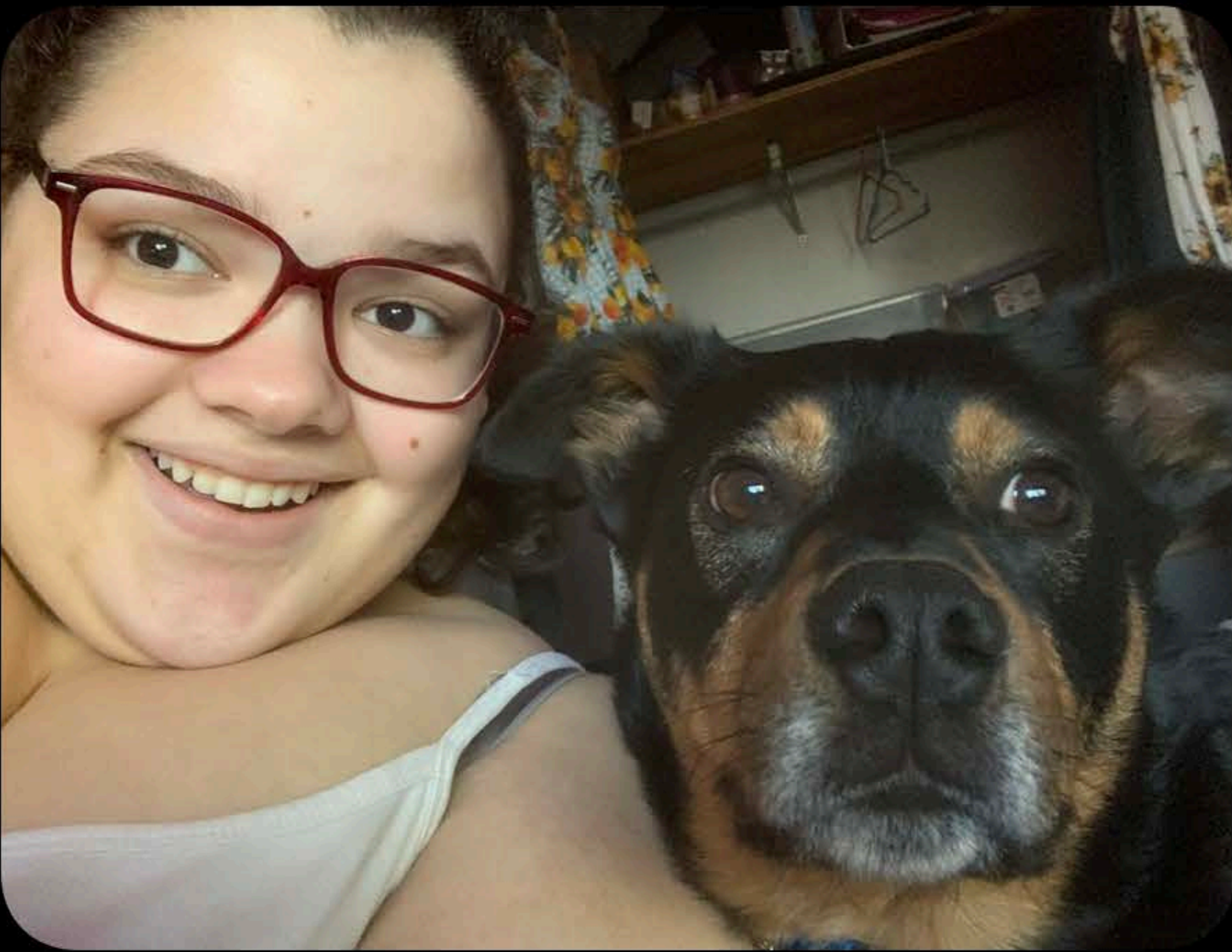
Mon, Feb 22, 16:04



Heyy Savyyyyyy!!!! 💕💕

We're meowing at you 🐱

Meow!



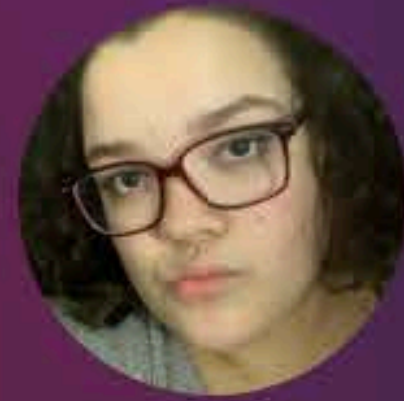
We're woofing at you



18:16 ↗



◀ Contacts



TTZ Savannah >

Tue, Apr 6, 18:47

Hey about the whole "free pass" thing, I want to just be open and honest with you. I plan on just going with the flow, but I don't want there to be any expectations. IF I do decide I want to do something, I don't want there to be any emotions involved. I'm going to try and make it work with Ian, so anything that happens there is completely Switzerland.

Oh no I know lol no worries

Never any expectations here

Sun, Apr 11, 16:39

Hey remember me?

Who's this?

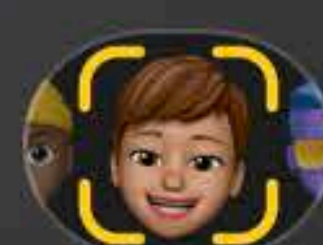
Hey sexy bitch

Who's this?

Mon, Apr 12, 16:57



iMessage





TTZ Alejandra >

You're so handsome

Im liking the new hair color



The red is fun

I bet! I'm glad you're having fun with colors 💙💜❤️

Yes!

I said before, I am starting this year with a whole new energy 🔥

1 Reply

So when are you coming to Vegas? 😊

1 Reply

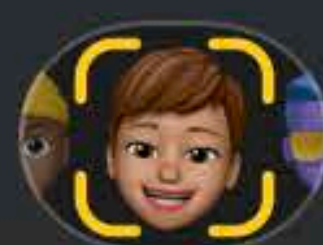
I said before, I am starting this year with a whole new energy 🔥

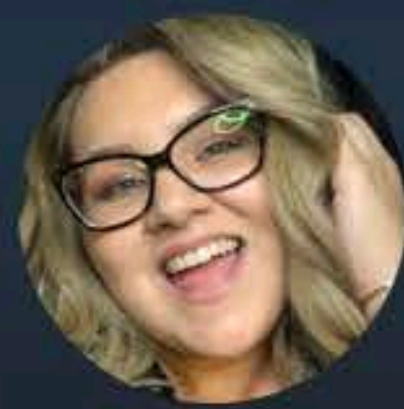
Yes 🔥

↻ Reply



iMessage





TTZ Alejandra >

I know but everytime I see you I'm like... hmmm has he texted me?
😏 lol



You guys can totally stay here when you come to Vegas 😊

Sounds like I won't have any "alone time" with you when you come to Vegas? 😞

I know 😞 sad day!
But I mean I'm willing to take a second trip later (:

And thank you! I'll let Savy know (:

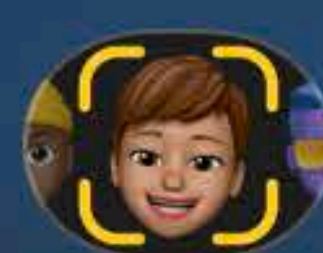
Or come a few days earlier 😜

Can you not hear us? Lol

I can



iMessage





TTZ Alejandra >

Hey handsome,
I just wanted to send you a text to let you know how much I truly appreciate your beautiful heart. I pray you have a wonderful nights rest. 🧡💋

Tue, Feb 16, 12:31



Awwww 🧡 Ally 😭 thank you. I did sleep OK 😊

Tue, Feb 16, 13:38

I'm glad you slept well 😊



Mmmh I wish I could shower with you 💧

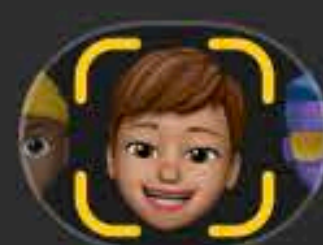


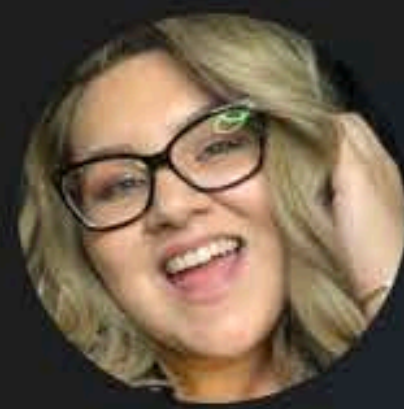
Are we going to Ally-jack you on Friday? 🙌🙌

I really hope so! I'm off work until tomorrow because of a Covid



iMessage





TTZ Alejandra >

We're talking to you ahahah

Heheheh 😂

We literally a threatened to show boobies, just to get your attention lol 😂

I wish... But in real life

Not just online

We will see ha ha

Tue, Feb 2, 04:37

On my way 🏃

I wish

↻ Reply

Cuddles 🤗



iMessage

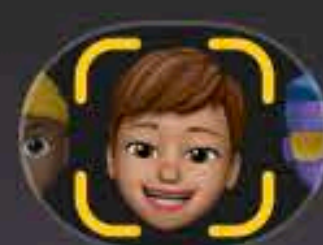


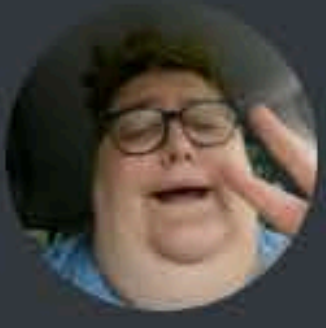
EXHIBIT B



Savy 04/29/2021

DUDE

I JUST WOKE UP FROM MY NAP
HAD A VERY HOT DREAM



Princess Kaybug👑 04/29/2021

Ooooo



Savy 04/29/2021

STEFAN, MALIA, ASHLEY, KASS, AND I
FUCKED BRO

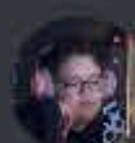
sexy 2



Hard to explain but basically it was an orgy

sexy 2



 **@Savy** STEFAN, MALIA, ASHLEY, KASS, AND I
FUCKED BRO



Ally💛 replied 04/29/2021

Ummm what? 😂



Savy 04/29/2021

LMAO WRONG PERSON
I WAS HELPING SOMEONE

 **@Savy** HAD A VERY HOT DREAM



Ally💛 replied 04/29/2021

Ohhh 😂

 **@Princess Kaybug**👑 I need part 2



Ally💛 replied 04/29/2021

Share please! LOL



Message #narnia



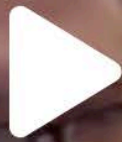
EXHIBIT C

Report



bbwpearara...
122 viewers

Follow



megananderson367

@superspyyyyyyyyye their allegations aren't even sa



intheeyeofherus

@sadiemariepaisley you prove that he is guilty



sadiemariepaisley

@rachiepie he SA 2 girls and all these sheep are standing up for him gross



britneymatthews25 joined

Add comment...



@peardiseistoxicaf



Report



bbwpearara...
117 viewers

Follow



phoenix.rysing.from.ash
And the music is awesome



megananderson367
in today's society it's seems everyone is a victim.
what is wrong with this world!!!



sadiemariepaisley
@intheeyeofherus piggy_stardust has videos of it



britneymatthews25 joined

Add comment...



@peardiseistoxicaf



Report



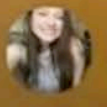
bbwpearara...
105 viewers

Follow



stayc34

she has no respect for no one



sadiemarielpaisley

If he had a lawyer he wouldn't be talking like this
FYI



cipreanna
On sight!!!



lauren8604 joined

Add comment...



@peardiseistoxicaf



Report



bbwpearara...
111 viewers

Follow



sadiemariepaisley

IM SCREEN RECORDING THIS LOL KEEP LYING



cipreanna

@superspyyyyyyyyyyye he doesn't have to



bossmomteresa

All caps for the dramatic flair....someone wants attention



fat.amanda.bynes joined

Add comment...



@peardiseistoxicaf



EXHIBIT D

Re: DEMAND TO CEASE AND DESIST DEFAMATION

Sadie Paisley <sadiepaisley98@gmail.com>

Wed 6/16/2021 10:47 AM

To: Raees Mohamed <raees@rmwarnerlaw.com>

Just so you know stefan I posted more and then privates it so you can't have your minions report it... sucks to suck dude don't post shit online that you don't want people to see.

I really hope you get departed back to Germany. You go sexually assault those women and leave my American women alone.

I hope you are taken to court they will rule you guilty. Your not the only one with money stupid you have 1 house try having three. My mother is the president of bentonville home office for Walmart...

You make shitty car parts... also my dad is a lawyer a REAL lawyer not some made up shit. I even asked him do lawyers email you to threaten you.

NO BECAUSE ITS A FELONY TO IMPERSONATE A LAWYER

Go to hell you nasty cunt

Thanks

Sadie ❤️

On Tue, Jun 15, 2021 at 8:50 PM Sadie Paisley <sadiepaisley98@gmail.com> wrote:

Also fuck you you can't tell me what I can and can't post online.

Lmao it's all true it's literally his face in the videos saying the shit he does.

So stop telling these girls to stop lying because in reality your shitty ass job ain't gonna stop proof mother fucker.

Contact me again and you'll hear from my lawyer who isn't a cheap ass shitty public defender type so good luck.

And go to hell!!! Cunt!!! I reactivated my account so eat shit

On Tue, Jun 15, 2021 at 8:33 PM Sadie Paisley <sadiepaisley98@gmail.com> wrote:

Oh also I will be calling the Las Vegas police for the false "lawyer" which is illegal. 🙄

Y'all are dumb af for sure it's not illegal to post public stuff. So come serve me papers to my face or stop being a fake ass keyboard warrior.

On Tue, Jun 15, 2021 at 8:31 PM Sadie Paisley <sadiepaisley98@gmail.com> wrote:

I'm not scared of your fake ass lawyers

But don't fear because I deleted the account not because you wanted me to buy because I'm just gonna remake it bigger and better... come get me 🤡 dumb ass.

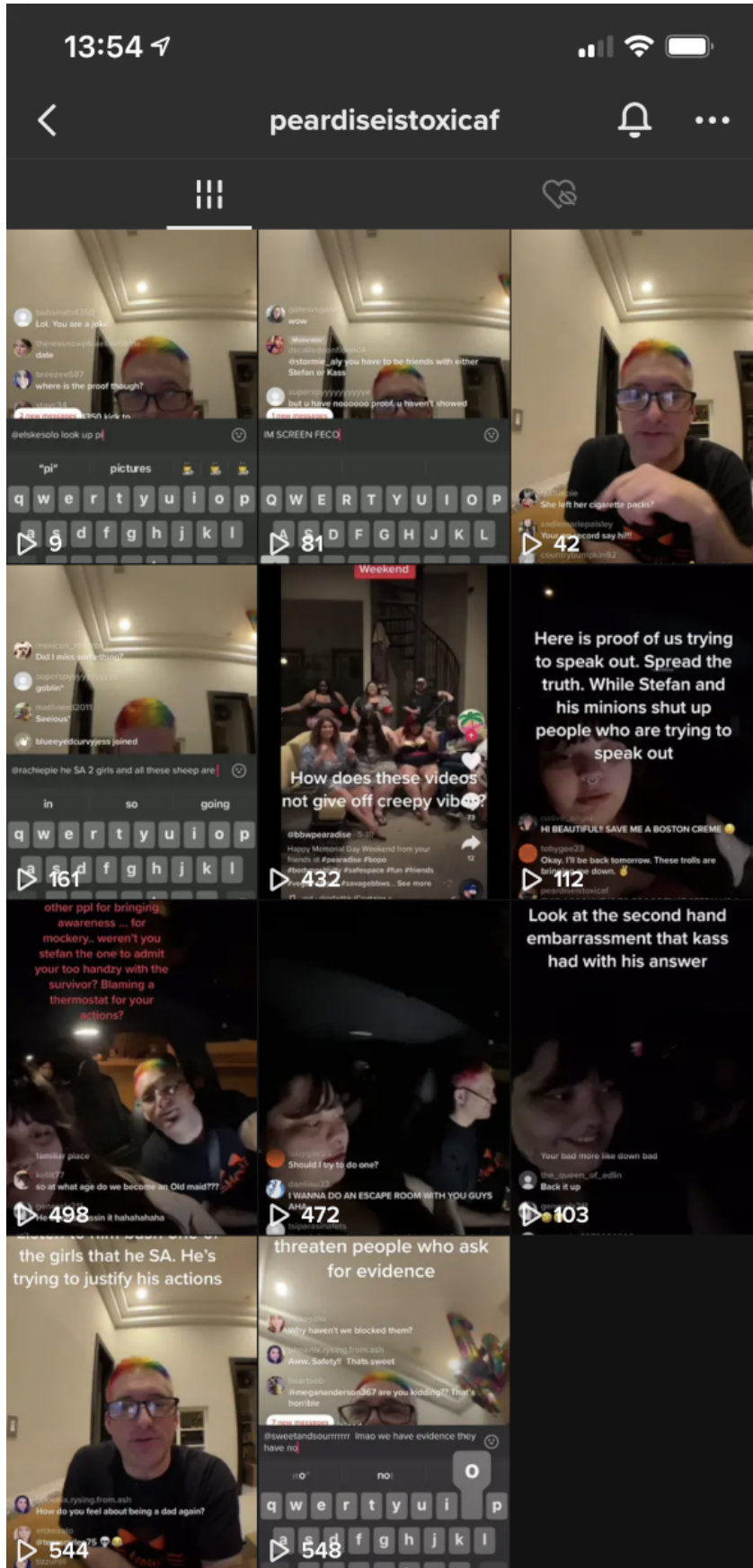
On Tue, Jun 15, 2021 at 6:56 PM Raees Mohamed <raees@rmwarnerlaw.com> wrote:

Sadie:

I am demanding on behalf of my client, who owns and operates the TikTok account, "BBWPearadise" that you immediately stop publishing false and defamatory information about him, and that shut down your TikTok account: "peardiseistoxicaf" (delete, and not simply make it private). Your false statements are egregious, and accuse my client of sexual

misconduct, among other things. You are also using your account to harass my client and his followers, in violation of TikTok's Terms (Section 5 - <https://www.tiktok.com/legal/terms-of-service?lang=en>).

We are aware of others that have similarly been defaming my client on TikTok and other platforms. We are taking legal action against them. We will include you in the forthcoming litigation, unless you immediately delete this account and confirm that you have done so, within 24 hours of receiving this email.



Raees Mohamed, Esq.
Partner
RM Warner P.L.C.
[8283 North Hayden Road Ste. 229,](https://www.rmwarnerlaw.com)
[Scottsdale, AZ 85258](https://www.rmwarnerlaw.com)
Phone: (480)-331-9397
Fax: 866-961-4984
www.rmwarnerlaw.com



RM WARNER
INTERNET / CORPORATE LAWYERS

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