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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 WEALTHY INC. and DALE
15 BUCZKOWSKI,

16 Plaintiffs,

17 v.

18 SPENCER CORNELIA, CORNELIA
19 MEDIA LLC, and CORNELIA
EDUCATION LLC,

20 Defendants.

Case No.: 2:21-cv-01173-JCM-EJY

**MOTION FOR PARTIAL SUMMARY
JUDGMENT**

21
22 Wealthy Inc. and Dale Buczkowski (collectively, “Plaintiffs”), by and through their
23 attorneys of record, the law firms of Peterson Baker PLLC and Culhane Meadows PLLC, hereby
24 move the Court for partial summary judgement against defendants Spencer Cornelia, Cornelia
25 Media LLC, and Cornelia Education LLC (collectively, “Defendants”) and in favor of Plaintiffs on
26 their second claim for relief for Defamation.
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1 This Motion is based upon FRCP 56, the accompanying Memorandum of Points and
2 Authorities, the supporting evidence attached hereto, the pleadings and papers on file herein, and
3 any oral argument the Court may wish to hear.

4 Respectfully submitted this 30th day of September, 2022.

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

In the time frame between late 2020 and early 2021, Defendants published two videos on Defendant Spencer Cornelia’s YouTube page which consisted of Mr. Cornelia interviewing non-party John Mulvehill. Within each video is a barrage of attacks expressly aimed at Plaintiffs. These attacks entail several statements that are demonstrably false and defamatory and have injured Plaintiffs.

The defamatory statements falsely accused Plaintiff Buczkowski of lying about his education, engaging in drug dealing and manufacturing, laundering money, and being involved in the death of a woman, to name a few. Each of the statements made were assertions of fact and could not be characterized, from an objective point of view, as opinions. Additionally, each statement calls Mr. Buczkowski’s character into question as well as his fitness to conduct his business of wealth coaching.

Discovery has closed in this matter and no dispute of material facts exists regarding Plaintiffs’ Defamation claim for relief. That is, the statements were: 1) false and defamatory; 2) published to third parties without privilege; 3) the fault of Defendants, amounting at least to negligence; and 4) the cause of damages. Defendants attempt to evade culpability by stating that someone else made the statements. Nonetheless, Defendants published the videos containing the statements on their YouTube channel and they cannot shift the blame.

Because no issues of material fact are in dispute as to facts supporting Plaintiffs’ Defamation claim for relief, the Court should grant this Motion for Partial Summary Judgment against Defendants on the Defamation claim for relief.

II. UNDISPUTED FACTS

A. Basis of Plaintiffs’ Claims for Relief

On June 21, 2021, Plaintiffs filed their Complaint, asserting the following claims for relief: 1) Unfair Competition and False Advertising under the Lanham Act, 15 U.S.C. § 1125 et seq.; 2) Defamation; 3) Intentional Infliction of Emotional Distress; and 4) Business Disparagement. (Complaint [ECF No. 1].) These claims are based on two videos released by

1 Defendant Spencer Cornelia on his YouTube channel that contain false and defamatory
 2 statements that harmed Plaintiffs. The videos consist of excerpts of interviews of non-party John
 3 Mulvehill conducted by Mr. Spencer and include statements "which are neither matters of opinion
 4 nor based on disputed anonymous accounts of potential witnesses, but are unqualified and
 5 provably false statements of fact." (Complaint [ECF No. 1], at ¶ 57.)

6 These false statements include assertions that Mr. Buczkowski lied about his educational
 7 achievement (*See* Excerpts of Transcription of YouTube Video The Authentic or Charlatan, Ex.
 8 1, at WEALTHY 000061); that Mr. Buczkowski laundered money (*See* Excerpts of Transcription
 9 of YouTube Video Derek Moneyberg – Fake Guru?, Ex. 2, at WEALTHY 000125); that Mr.
 10 Buczkowski manufactured and/or sold illegal drugs (*See* Ex. 2, at WEALTHY 000125); that Mr.
 11 Buczkowski framed Mr. Mulvehill for his 2013 arrest in Las Vegas, leading to four felony and
 12 four misdemeanor charges (*See* Ex. 2, at WEALTHY000117-WEALTHY000118,
 13 WEALTHY000123-WEALTHY000124); and that Mr. Buczkowski was involved in the death of
 14 the woman who was the alleged victim in the arrest of Mr. Mulvehill (*See* Ex. 2, at
 15 WEALTHY000124).

16 **B. Mr. Buczkowski's Business**

17 Mr. Buczkowski graduated from the University of Chicago Booth School of Business with
 18 a Masters of Business Administration (MBA) degree in 2015. (Declaration of Dale Buczkowski,
 19 Ex. 3, at ¶ 3.) He is the President and Co-Founder of Larson Consulting, founded in 2011, which
 20 is dedicated to helping leaders solve critical strategic issues, accelerate growth, and improve the
 21 reputation and brand of their organizations in the context of strongly held values. (Ex. 3, at ¶ 4.)

22 Wealthy Inc. ("Wealthy") was founded in 2019 and is a leading entrepreneurship, finance,
 23 business, real-estate and self-improvement company owned and operated by Mr. Buczkowski,
 24 under the federally registered trademark, Derek Moneyberg®. (Ex. 3, at ¶ 5.) Wealthy offers three
 25 entry level programs entitled Moneyberg® Mentoring, Markets Mastery, and Real Estate Riches.
 26 These programs focus on entrepreneurship, financial markets, and real-estate investing. These
 27 programs are currently offered at \$5,000 each. (Ex. 3, at ¶ 6.) Wealthy also offers its clients a
 28 program entitled Mastermind Network, which currently requires a \$20,000 initiation fee and a

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1 \$5,000 annual renewal fee. This program provides a monthly coaching call and a forum for top
 2 students to network and exchange ideas in a high value environment. (Ex. 3, at ¶ 7.) Wealthy also
 3 offers 1-ON-1 Training with Derek Moneyberg® which is currently offered at prices starting at
 4 \$60,000 and including prices of \$75,000 or more, for well qualified applicants. (Ex. 3, at ¶ 8.)

5 **C. Content of the Statements**

- 6 1. The Videos include the following assertions¹ that Mr. Buczkowski lied about his
 7 educational achievement:

8 "[JA:] I'm Derek Moneyberg, I have this University of Chicago degree OK
 which is not even true . . ." (Ex. 1, at WEALTHY000061).

9 "[JA:] Yeah, he also like even his credentials, like someone said in one of
 the YouTube comments they provided proof that like that he never went to,
 10 like, you know, he never attended Chicago Business School, he did like
 some kind of online thing." (Ex. 2, at WEALTHY000128).

11 "[JA:] He just repackaged content, and then made it out, he made himself
 out to be some kind of genius because he studied business but he doesn't
 12 have a real . . . uh, he never actually went to University of Chicago." (Ex.
 2, at WEALTHY000139).

13 "[JA:] He's always saying like, well I have this Ivy League degree and he
 didn't attend Chicago Business School, some online thing." (Ex. 2, at
 WEALTHY000152).

- 14 2. The Second Video includes the following assertions that Mr. Buczkowski laundered
 15 money:

16 "[JA:] He has listed like that he had a business called like Larson
 Consulting which, which has like no you know substance behind it online,
 17 but it looks very well like it could be a front. [SC:] Yeah the address is
 right down the street from my house here too in Vegas. [JA:] It looks, it
 18 looks very well it could be a front for laundering money." (Ex. 2, at
 WEALTHY000125).

- 19 3. The Second Video includes the following assertions that Mr. Buczkowski manufactured
 20 and/or sold illegal drugs:

21 "[SC:] That's shady yeah so the next note on my notes is the drug house. So
 you believe, well I guess with public record. He must have been running a
 22 drug operation, if it's a house tied to him, it was a house purchased using
 drug money. Is there any reason to believe that it was him running a drug
 operation. Do you think that's how he made his money. [JA:] I don't I don't
 23 know the details. I know, I know he was. (Ex. 2, at WEALTHY000125)

24 "[JA:] He has like a lengthy arrest record where he was involved with, you
 know property forfeiture for manufacturing illegal drugs, for battery, all
 25 kinds of ... [SC:] it's public record too like it's known it's public. [JA:]
 Yeah, yeah and yeah and he's tried to hide all of it." (Ex. 2, at
 WEALTHY000118).

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 27
 28 ¹ Within these quotations, "JA" signifies John Mulvehill aka John Anthony and "SC" signifies
 Spencer Cornelia.

- 1 4. The Videos include the following assertions that Mr. Buczkowski framed Mr. Mulvehill
2 for his 2013 arrest in Las Vegas, leading to four felony and four misdemeanor charges:

3 "[JA:] That's why I don't give a f- saying all this stuff. Like, they came
4 after me trying to set me up for an arrest in the past – in the past which
5 we'll discuss in another video that mother-er." (Ex. 1, at
6 WEALTHY000070-WEALTHY000071).

7 "[JA:] I've never been accused or charged with rape that situation with
8 Derek did not involve any sex in the case or any kind of rape accusation.
9 So, you know, like, it's very, very frustrating that they'll play like as low
10 and dirty as they possibly can. Even to the point of setting people up for
11 arrests, even in the point of using intimidation and bullying and threats, and
12 all this stuff." (Ex. 2, at WEALTHY000134).

13 "[JA:] Yeah, I actually got arrested. My only time I've ever been arrested in
14 my life was hanging out with this motherfucker one on one, okay he is like
15 one of the worst human beings I've ever met. I didn't know at the time, but
16 he was using aliases, okay. His real name is Dale Buczkowski. He goes by
17 the alias, he was going by the alias RSD Derek had his face hidden
18 everything, we can show you. I'll send you a picture of when he came to
19 visit me in Vegas. basically I got a text and said, Hey, I'm coming to
20 Vegas. Don't, don't let anyone know I'm in town, I'll explain later, okay
21 never explained, without going into all the details of what happened, you
22 know, it's, it's very obvious that he was involved there." (Ex. 2, at
23 WEALTHY000117-WEALTHY000118).

24 "[SC:] At the time of your arrest for a guy that's been in this dating world
25 for so long you've had basically one night, that ended in an arrest and it
26 happened to be with Derek, or Dale is his real name. [JA:] And were one-
27 on-one as well. [SC:] You were one-on-one and there I know there was a
28 lot of shady stuff too where he disappeared. He changed his number or
29 something, and then it's like he's your friend he's hanging out with you and
30 you get arrested and then he's gone. [JA:] He was using a burner phone,
31 and he was using an alias at that time. And he claimed to not know the girls
32 that we approached, and then it turns out that one of the main girls in the
33 group was working like a block from where he lives in Chicago, and then
34 that girl ended up dead." (Ex. 2, at WEALTHY000123-
35 WEALTHY000124).

- 36 5. The Second Video includes the following assertions that Mr. Buczkowski was involved in
37 the death of the woman who was the alleged victim in the arrest of Mr. Mulvehill:

38 "[JA:] That girl a 28 year old, living in Las Vegas who's like the primary
39 witness in the case ended up dead, and I couldn't find the cause of death I
40 searched for it. 28 doesn't make much sense. [SC:] Wow, that was really
41 bizarre. [JA:] That was the link to him." (Ex. 2, at WEALTHY000124).
42 In reply to a comment on the Second Video's YouTube page stating the
43 following: "'And then that girl ended up dead' Whoa that escalated quickly.
44 RIP"; Mr. Cornelia stated "looked up the women in Clark County records
45 and she definitely passed. Tried to find the cause of death but they required
46 a lawyer's consent in order to attain those documents." (Ex. 2, at
47 WEALTHY000124)\

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 2 **III. SUMMARY JUDGMENT STANDARD**

3 “A party is entitled to summary judgment when the pleadings and discovery show that there
 4 are no genuine issues as to any material fact, and that the moving party is entitled to judgment as a
 5 matter of law. FRCP 56(c); *Anderson v. Liberty Lobby, Inc.*, 477 U. S. 242, 248, 106 S. Ct. 2505,
 6 91 L. Ed.2d (1986). If the evidence is such that a reasonable jury could return a verdict in favor of
 7 the nonmoving party, then there are genuine issues of material fact. *See Anderson*, 477 U. S. at
 8 348. All facts and inferences shall be drawn in the light most favorable to the nonmoving party.
 9 The nonmoving party may not, however, rest on its pleadings, but rather must present probative
 10 and material evidence which would permit a trier of fact to find in its favor. *Celotex Corp. v.*
 11 *Catrett*, 477 U.S. 317, 324, 106 S. Ct. 2548, 91 L.Ed. 265 (1986). The nonmoving party need not
 12 present its own affidavits, but may rely on the ‘depositions, answers to interrogatories, and
 13 admissions on file’ to designate specific facts showing that there is a genuine issue for trial. *Id.*

14 **IV. DISCUSSION**

15 **A. Plaintiffs are Entitled to Summary Judgment on Their Claim for Defamation.²**

16 A claim for relief for defamation requires the plaintiff to prove four elements: (1) a false
 17 and defamatory statement; (2) an unprivileged publication to a third person; (3) fault, amounting to
 18 at least negligence; and (4) actual or presumed damages. *CCSD v. Virtual Educ. Software, Inc.*,
 19 125 Nev. 374, 385, 213 P.3d 496, 503 (2009) (citations and quotations omitted). “However, if the
 20 defamatory communication imputes ‘a person’s lack of fitness for trade, business, or profession,’
 21 or tends to injure the plaintiff in his or her business, it is deemed defamation per se and damages
 22 are presumed.” *Id.* (quoting *K-Mart Corp. v. Washington*, 109 Nev. 1180, 1192, 866 P.2d 274, 282
 23 (1993). “A statement is defamatory when it would tend to lower the subject in the estimation of
 24 the community, excite derogatory opinions about the subject, and hold the subject up to contempt.”
 25 *Lubin v. Kunin*, 117 Nev. 107, 111, 17 P.3d 422, 425 (2001) (citations omitted). “Whether a
 26 statement is defamatory is generally a question of law.” *Id.* Statements of opinion are not

27 ² Although Plaintiffs demonstrate that they are entitled to summary judgment on their Defamation
 28 claim for relief, if the Court believes any element is not satisfied, it should still order the material
 facts it finds not to be in dispute as established facts in the case pursuant to FRCP 56(g).

1 actionable. *Nevada Independent Broadcasting Corp. v. Allen*, 99 Nev. 404, 410, 664 P.2d 337, 341
2 (1983).

3 When the plaintiff is a public figure or a limited-purpose public figure, he must show actual
4 malice by the defendant when making the defamatory statement. *Pegasus v. Reno Newspapers,*
5 *Inc.*, 118 Nev. 706, 719, 57 P.3d 82, 90-91 (2002) (citing *Gertz v. Robert Welch, Inc.*, 418 U.S.
6 323, 342-43, 94 S.Ct. 2997, 41 L.Ed.2d 789 (1974)). Actual malice exists when the statement is
7 made with knowledge that it was false or reckless disregard of whether it was false or not. *Id.*
8 Public figures are those “who achieve such pervasive fame or notoriety that they become a public
9 figure for all purposes and in all contexts.” *Id.* However, a limited-purpose public figure is so
10 defined because he “voluntarily injects himself or is thrust into a particular public controversy or
11 public concern, and thereby becomes a public figure for a limited range of issues.” *Id.*

12 *1. The Statements Published by Defendants Were False and Defamatory*³

13 The statements at issue in this litigation are indisputably false and defamatory. (*See Ex. 3,*
14 *at ¶¶ 16, 19, 21, 25, 27.*) A non-exhaustive list of the statements published by Defendants include
15 assertions that Plaintiff Buczkowski: (1) lied about his educational achievements; (2) laundered
16 money; (3) manufactured and/or sold illegal drugs; (4) framed non-party John Mulvehill for his
17 2013 arrest in Las Vegas which led to four felony and four misdemeanor charges; and (5) was
18 involved in the death of the woman who was the alleged victim in the arrest of Mr. Mulvehill. (*See*
19 *Undisputed Facts, Sections II(B) & (C), supra.*) Without exception, each of these statements
20 “would tend to lower [Mr. Buczkowski] in the estimation of the community, excite derogatory
21 opinions about [Mr. Buczkowski], and hold [Mr. Buczkowski] up to contempt” and thus are
22 defamatory. *Lubin v. Kunin*, 117 Nev. at 11, 17 P.3d at 425.

23 During discovery, Defendants did not produce one shred of evidence to support the
24 truthfulness of the published statements, nor did they provide any credible basis for their belief of
25 the truthfulness of the statements. First, regarding the statements that Mr. Buczkowski did not
26 receive a degree from the University of Chicago, this statement is indisputably false. (*See Ex. 3, at*

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28 ³ Although the statements that impugn Mr. Buczkowski’s fitness for business are defamation per se, he will discuss each element of Defamation for the Court’s consideration.

1 ¶¶ 3, 16-17.) Indeed, Defendant Spencer Cornelia has conceded that he believes these statements
2 are false.⁴ (See Defendant Spencer Cornelia’s Responses to Plaintiffs’ First Set of Interrogatories
3 to Defendants Pursuant to FRCP 33, Ex. 4, at Response No. 9) (“The only statements alleged in the
4 Complaint Defendant now believes to be false are those concerning the legitimacy of Buczkowski’s
5 education credentials.”)

6 Second, the reasons provided by Mr. Cornelia for his belief that Plaintiffs laundered money
7 are incredible and do not create a genuine dispute of material fact on the issue of truthfulness. Mr.
8 Cornelia asserts, as proof that Plaintiffs laundered money, that Mr. Buczkowski is the only officer
9 of Larson Consulting, that there is only one share of Larson Consulting, and that the total authorized
10 capital for the company is \$100. (Ex. 4, at Response No. 7.) Additionally, Mr. Cornelia states that
11 Larson Consulting did not have a sign outside and that it appears to have an inactive Facebook
12 page. (Ex. 4, at Response No. 7.) After reciting these unsubstantiated statements, Mr. Cornelia
13 makes the illogical leap that these alleged facts formed the basis as to why he believed Larson
14 Consulting “could have existed for the purpose of laundering money.” (Ex. 4, at Response No. 7.)
15 Not only does Mr. Cornelia fail to suggest a link between these assertions and money laundering,
16 but he even demonstrates his negligent uncertainty that the statements were true when he said
17 Plaintiffs “*could* have” been laundering money. Nor could he confirm the veracity of the
18 allegations of money laundering because they are false. (Ex. 3, at ¶ 19.)

19 Third, as the basis for the statements that Mr. Buczkowski was selling and/or manufacturing
20 drugs, Mr. Cornelia referenced a civil asset forfeiture complaint which contained allegations about
21 Daryl Buczkowski, Plaintiff’s father. (Ex. 4, at Response No. 7.) Defendants recklessly published
22 the videos containing assertions of drug involvement without a true belief to their veracity. Each
23 of these statements are false. (Ex. 3, at ¶ 21-23.)

24 Regarding the fourth and fifth statements referenced above, Defendants never provided a
25 basis for their truthfulness in discovery. The statements that Defendants published about Mr.

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28 ⁴ Mr. Cornelia stated that he did not believe the statement was false when he published the videos,
but he never provided any basis for his previously held belief. (Ex. 4, at Response No. 9.)

1 Buczkowski were false, (Ex. 3, at ¶¶ 25, 27), and defamatory and the Court should grant summary
2 judgment in favor of Plaintiffs on their Defamation claim for relief.

3 *2. Defendants Published Unprivileged Statements to Third Parties*

4 It is undisputed that Defendants published the videos containing the defamatory statements.
5 By posting the videos on Mr. Cornelia’s YouTube page, Defendants have published the statements
6 to third parties. Defendants do not, because they cannot, claim any privilege. *See, e.g., Sahara*
7 *Gaming Corp. v. Culinary Workers Union Local 226*, 115 Nev. 212, 215, 984 P.2d 164, 166 (“The
8 law has long recognized a special privilege of absolute immunity from defamation given to the
9 news media and the general public to report newsworthy events in judicial proceedings.”); *Pope v.*
10 *Motel 6*, 121 Nev. 307, 317, 114 P.3d 277, 284 (2005) (concluding that a qualified privilege applies
11 to statements made to police in aid of law enforcement). Defendants published the statements to
12 third parties without privilege and the Court should grant summary judgment in favor of Plaintiffs
13 on their Defamation claim for relief.

14 *3. Defendants are at Fault for Publishing the Statements*

15 The United States Supreme Court held that “the States may define for themselves the
16 appropriate standard of liability for a publisher or broadcaster of defamatory falsehood injurious to
17 a private individual,” “so long as they do not impose liability without fault.” *Gertz v. Robert Welch,*
18 *Inc.*, 418 U.S. 323, 348 (1974). In Nevada, the threshold is fault that, at the least, amounts to
19 negligence. *CCSD v. Virtual Educ. Software, Inc.*, 125 Nev. at 385, 213 P.3d at 503. Negligence
20 is “[t]he failure to exercise the standard of care that a reasonably prudent person would have
21 exercised in a similar situation.” *Negligence, Black’s Law Dictionary* (11th ed. 2019).

22 Here, to say that Defendants were negligent would be an understatement. Mr. Cornelia has
23 conceded that the statements claiming Mr. Buczkowski lied about his education were false. (Ex.
24 4, at Response No. 9.) His inference that Plaintiffs “could have” been involved in money laundering
25 because Larson Consulting has one officer, one share, and an inactive Facebook page is negligent
26 because it does not demonstrate the standard of care that a reasonable person would have exercised
27 in a similar situation. *CCSD*, 125 Nev. at 385, 213 P.3d at 503. Likewise, Defendants were
28 negligent to make the leap that Mr. Buczkowski was involved in drug operations because a civil

1 asset forfeiture complaint contained allegations about Mr. Buczkowski's father. Lastly, Defendants
2 never provided any basis for statements accusing Mr. Buczkowski of framing Mr. Mulvehill for his
3 arrest or the statement that he was involved in the death of the victim of the crime resulting in Mr.
4 Mulvehill's arrest.

5 When asked what efforts he took to ascertain the truthfulness of the statements, Mr. Spencer
6 stated that he was "provided this information from third parties including Mr. Mulvehill" and that
7 he "reviewed a video Mr. Mulvehill published ... which repeats many of his claims." (Ex. 4, at
8 Response No. 8.) These are not the investigatory techniques of a prudent person and Defendants
9 were, at the least, negligent. Defendants made no effort to verify the statements prior to publishing
10 them and they are at fault for the defamatory statements made about Mr. Buczkowski. Accordingly,
11 the Court should grant summary judgment in favor of Plaintiffs on their Defamation claim for relief.

12 *4. The Statements Impugn Mr. Buczkowski's Fitness for Business and Damages are Presumed*

13 As a threshold matter, statements that impugn a plaintiff's fitness for trade, business, or his
14 profession are deemed defamation per se and damages are presumed.⁵ *CCSD v. Virtual Educ.*
15 *Software, Inc.*, 125 Nev at 385, 213 P.3d at 504 (citing cases). Here, three of the five statements
16 impugn Mr. Buczkowski's fitness for trade, business, and his business acumen. The statement
17 alleging that Mr. Buczkowski lied about his educational achievements calls into question his
18 qualifications to provide wealth coaching. *See Nevada Ind. Broadcasting v. Allen*, 99 Nev. 404,
19 664 P.2d 337 (1983) (holding that a political candidate was entitled to recover under defamation
20 per se for comments that injured his professional reputation.). Similarly, the allegations that he
21 was involved in drug dealing and money laundering suggest that he has built wealth through illegal
22 channels and not through the methods and strategies that he teaches in his seminars. *See CCSD*,
23 125 Nev. at 385, 213 P.3d at 504 ("Thus, if a statement accused an individual of personal
24 misconduct in his or her business or attacks the individual's business reputation, the claim may be
25 one for defamation per se."). Each of these statements impugns Mr. Buczkowski's fitness to
26 provide wealth coaching and are, per se, defamatory with presumed damages. *Id.* Because damages

27 _____
28 ⁵ Although damages are presumed in cases of defamation per se, Plaintiffs will prove the amount of damages at trial.

1 are presumed for several of the statements published by Defendants, the Court should grant
2 summary judgment in favor of Plaintiffs on their Defamation claim for relief.

3 5. *Defendants Published Statements of Fact, Not Opinion*

4 Whether a statement is one of fact or of opinion is a question of law. *Nevada Ind.*
5 *Broadcasting*, 99 Nev. at 410, 664 P.2d at 342. The question the Court must ask is “whether a
6 reasonable person would be likely to understand the remark as an expression of the source’s opinion
7 or as a statement of existing fact.” *Id.*

8 Assertions that Mr. Buczkowski having a degree from the University of Chicago “is not
9 true” and that “[h]e must have been running a drug operation, if it's a house tied to him, it was a
10 house purchased using drug money” are not expression of opinion but, rather, assertions of fact.
11 (*See Undisputed Fact, Section II(C), supra.*) A reasonable person would understand the statements
12 as expressions of fact, not of opinion, and the Court should grant summary judgment in favor of
13 Plaintiffs.

14 6. *Mr. Buczkowski is not a Public Figure or a Limited-Purpose Public Figure*

15 A public figure is a public official or an individual who “achieves such pervasive fame or
16 notoriety that they become a public figure for all purposes and in all contexts.” *Pegasus*, 118 Nev.
17 at 719, 57 P.3d at 91. Mr. Buczkowski is a private individual, not a public figure, engaged in the
18 business of wealth coaching and cannot be said to have “pervasive fame or notoriety.”

19 “A limited-purpose public figure is a person who voluntarily injects himself or is thrust into
20 a particular public controversy or public concern, thereby becomes a public figure for a limited
21 range of issues.” *Id.* Mr. Buczkowski is not involved in any issues of public controversy or public
22 concern. *See Bongiovi v. Sullivan*, 122 Nev. 556, 573, 138 P.3d 433, 446 (2006) (listing examples
23 of doctors thrusting themselves into an area of public concern on an issue by “writing letters to
24 politicians and hiring a private lobbyist and public relations agent, authoring articles in national
25 magazines and appearing on national television shows, [and] testifying before an FDA panel.”).
26 Because Mr. Buczkowski is not a public figure or a limited-purpose public figure, he does not need
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1 to demonstrate malice⁶ and the Court should grant summary judgment in their favor on the
2 Defamation claim for relief.

3 **V. CONCLUSION**

4 For the foregoing reasons, the Court should grant summary judgment in favor of Plaintiffs
5 and against Defendants on Plaintiffs’ Defamation claim for relief.

6
7 Respectfully submitted this 30th day of September, 2022.

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26 *Attorneys for Plaintiffs Wealthy Inc. and*
27 *Dale Buczkowski*

28 ⁶ Although Mr. Buczkowski is not a public figure or a limited-purpose public figure, he has provided ample evidence that Defendants knew the falsity of the statements they published or demonstrated reckless disregard for the truth, thus demonstrating malice. *See Pegasus*, 118 Nev. at 722, 57 P.3d at 92 (“[A]ctual malice is proven when a statement is published with knowledge that it was false or with reckless disregard for its veracity.”).

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CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of Peterson Baker, PLLC, and that a true and correct copy of the **MOTION FOR PARTIAL SUMMARY JUDGMENT** was served via electronic service, via CM/ECF, on this 30th day of September, 2022, and to the following:

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INDEX OF EXHIBITS

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3.	Declaration of Dale Buczkowski
4.	Defendant Spencer Cornelia’s Responses to Plaintiffs’ First Set of Interrogatories to Defendants Pursuant to FRCP 33
5.	Defendant Spencer Cornelia’s Responses to Plaintiff’s First Set of Requests for Admission Pursuant to FRCP 36
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EXHIBIT

Excer ts of Transcri tion of YouTube Video The Authentic or Charlatan

EXHIBIT

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TRANSCRIPTION OF YOUTUBE VIDEO

11

THE AUTHENTIC OR CHARLATAN

12

Saturday, December 19, 2020

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Proceedings recorded by electronic sound recording;

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Transcript produced by transcription service.

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Transcribed by: BECKY J. PARKER, RPR, CCR

25

Nevada Certified Court Reporter No. 934

1 buy more stuff, okay, which is fine if the content
2 works.

3 Now, here's the big smoking gun. He
4 outsources 100 percent of his content. Yes,
5 100 percent. And not only that, but to little kids.
6 Okay? This guy that I spoke to is 21. He just got
7 through with college. Okay? Didn't know a whole lot
8 about business, has no real-world professional
9 experience. He wrote 100 percent of Derek's business
10 mentorship. Yes, 100 percent.

11 Derek goes on, I'm Derek Moneyberg. I have
12 this University of Chicago degree, okay, which is not
13 even true. He attended some online classes. Most of
14 what he says is a full fabrication. Literally,
15 100 percent of his content is outsourced. Okay? So
16 he's having guys research stuff about business, about
17 stocks, about real estate.

18 I showed you the screenshots that were
19 shared. Basically he has, for his real estate
20 mentorship program coming in January, he has -- he has
21 it being written by a 19-year-old Romanian kid who
22 literally in the screenshots is, like, Hey, I know
23 nothing about real estate. I'm going to start doing
24 some research.

25 So what he's having these guys do, what

1 into the full details, but what he -- what he's saying
2 is that tons of guys that couldn't afford it are getting
3 signed up for credit cards and loans that they -- that
4 they know for a fact they can't repay, okay, which is
5 illegal. Okay? They're not doing the lending
6 themselves, but they're putting them in contact.
7 They're coercing them heavily, which is illegal, to take
8 out loans and credit cards that they cannot afford.
9 They know for a fact they can't afford, with massive
10 interest rates and penalties and all this stuff,
11 which -- so these -- and it's ruining guys' lives.
12 They're getting them to max the credit cards too.

13 So when they get this card, they say, Okay,
14 now perfect, you have a 10K line. You can get into
15 these two mentorships. Or if they get approved for
16 more, okay, we can get you into these three mentorships.
17 Look, now -- now your life is going to be for the
18 better. You're going to make all that money back in no
19 time. No, they're not. Okay? Now their life is
20 ruined.

21 And he gave me examples, and I've gotten
22 emails of all kinds of examples of guys literally having
23 mental breakdowns. Okay? Literally lives being
24 destroyed. Okay? That's why I don't give a f- saying
25 all this stuff. Like, they came after me, trying to set

1 me up for an arrest in the past -- in the past, which
2 we'll discuss in another video, that motherf-er. Okay,
3 but --

4 SPENCER CORNELIA: Which, by the way, like,
5 John, share with me. He gets email -- like, understand
6 the -- the venom he comes at this. He gets the emails
7 all the time of all the kids whose lives have been
8 ruined. So he sees it firsthand. So when he speaks on
9 this, he's speaking from many students reaching out
10 and --

11 JOHN ANTHONY: Yeah.

12 SPENCER CORNELIA: -- speaking negatively of
13 this. And for guys like us, we -- we take it to heart
14 because we hate hearing these stories.

15 JOHN ANTHONY: Yep. Yeah. And -- and so
16 these -- these are guys with their lives ab- --
17 absolutely ruined. These are guys that are
18 impressionably young men that are, like, depressed, that
19 are down and out. They have nowhere to turn. Okay?
20 And they f-ing exploit them and make them f-ing take out
21 loans and lines of credit so that they can get the money
22 for their programs. And they know these guys can't
23 repay it.

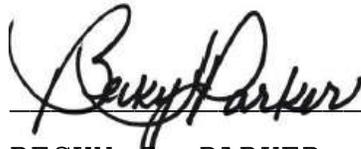
24 Literally there's multiple stories of guys
25 with their lives totally ruined. Okay? And that is why

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C E R T I F I C A T E

I, BECKY J. PARKER, do hereby certify that the foregoing pages constitute a full, true, and accurate transcript of the digital recording, all transcribed to the best of my skill and ability.

WITNESS my hand this 4th day of February, 2022.



BECKY J. PARKER, RPR, CCR

Nevada Certified Court Reporter No. 934

EXHIBIT 2

Excer ts of Transcri tion of YouTube Video Derek Moneyberg Fake Guru

EXHIBIT 2

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10 TRANSCRIPTION OF YOUTUBE VIDEO

11 DEREK MONEYBERG - FAKE GURU?

12 Friday, February 19, 2021

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19 Proceedings recorded by electronic sound recording;

20 Transcript produced by transcription service.

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25 Transcribed by: BECKY J. PARKER, RPR, CCR
Nevada Certified Court Reporter No. 934

1 FRIDAY, FEBRUARY 19, 2021

2 -oOo-

3

4 (Introductory statement.)

5 SPENCER CORNELIA: If you missed Part 1, link
6 is in the description for you to watch later.

7 John Anthony Lifestyle joined me to share all of the
8 shady business practices of Derek Moneyberg, which
9 continues into this video. If you enjoy expose-type
10 videos in the dating niche, then check out his channel
11 in the description. Enjoy.

12 (YouTube video begins.)

13 JOHN ANTHONY: Yeah. I -- I actually got
14 arrested. My only time I've ever been arrested in my
15 life, it was hanging out with this motherfucker one on
16 one. Okay? He's like one of the worst human beings
17 I've ever met.

18 I didn't know at the time, but he was using
19 aliases. Okay? His real name is Dale Buczkowski. He
20 goes by the alias -- he was going by the alias RSD Derek
21 and had his face hidden and everything. And we can show
22 you -- I'll send you a picture from when he -- he came
23 to visit me in Vegas.

24 Basically I get a text that said, Hey, I'm
25 coming to Vegas. Don't -- don't let anyone know I'm in

1 town. I'll explain later. Okay? Never explained.
2 Without going into all the details of -- of what
3 happened, you know, it's -- it's very obvious that he
4 was involved there. Yeah.

5 But basically I found out this guy was using
6 aliases, burner phones. I did some research on him,
7 had -- had some people help me do some research on him
8 and he has, like, a lengthy arrest record where he was
9 involved with, you know, property forfeiture for -- for
10 manufacturing illegal drugs, for battery. All kinds of
11 stuff.

12 SPENCER CORNELIA: It's public record too.
13 Like it's -- it's known. It's public.

14 JOHN ANTHONY: Yeah. Yeah, and -- yeah, and
15 he's tried to hide all of it. And basically what --
16 what this guy has done is he's -- he's, like, no
17 different than any of the -- the fake gurus that -- that
18 you roast all the time on -- on your channel, is he's
19 regurgitating stuff from, like, Sam Lovens or -- or
20 Dan Pena or, like, you know, just some classical
21 business guys or stuff you could read in Forbes
22 Magazine. And he just gives, like, a -- some very basic
23 regurgitated stuff, and then it's just very
24 high-pressure sales tactics to buy his courses, his
25 high-ticket courses. So he even has, like, a \$75,000

1 coaches who know how to do it, but then if you're a fake
2 guru, you can use the same messaging and it's -- it
3 can --

4 JOHN ANTHONY: Yeah.

5 SPENCER CORNELIA: -- just still sucker
6 people in.

7 JOHN ANTHONY: Yeah. Yeah. It always
8 bothered me because I -- I was the guy that, like, I --
9 I didn't -- I didn't come into this at all from the
10 internet marketing side. I came into this from, like,
11 learning the real skill and, like, putting in the blood,
12 sweat, and tears and, like, just relentlessly optimizing
13 a system over 15 years, which is why I take even more
14 offense to the fact that there's all these clowns making
15 a mockery of it, you know, teaching trash systems and
16 just ripping people off. And I always deal with the
17 fallout because I'm the guy in the industry that
18 actually fixes the problem. So I've been talking to
19 guys for many years that, you know, spent lots of time,
20 effort, and money and didn't get anywhere.

21 SPENCER CORNELIA: You -- at -- at the time
22 of your arrest, for a guy that's been in this dating
23 world for so long, you've had basically one night that
24 ended in an arrest, and it happened to be with Derek, or
25 Dale is his real name.

1 JOHN ANTHONY: Yep.

2 SPENCER CORNELIA: And --

3 JOHN ANTHONY: And we -- and we were one on
4 one as well.

5 SPENCER CORNELIA: You were one on one. And
6 there -- I know there was a lot of shady stuff, too,
7 where he disappeared, he changed his number or
8 something, and then it's, like, he's your friend, he's
9 hanging out with you, and you get arrested, and then
10 he's gone.

11 JOHN ANTHONY: He was using a -- a burner
12 phone and he was using an alias at that time. And he
13 claimed to not know the -- the girls that we approached.
14 And then it turns out that one of the main girls in the
15 group was working, like, a block from where he lives in
16 Chicago. And then that girl ended up dead. That girl,
17 a 28-year-old living in Las Vegas was like the primary
18 witness in the case, ended up dead. And then -- and I
19 couldn't find the cause of death. I searched for it.
20 28, doesn't make much sense. I think that was, like,
21 the --

22 SPENCER CORNELIA: Wow. That's really
23 bizarre.

24 JOHN ANTHONY: -- that was the link to him.

25 SPENCER CORNELIA: That's shady.

1 Yes. So the next note on my notes is the --
2 the drug house. So you -- do you believe -- well, I
3 guess with public record, he must have been running a
4 drug operation. If it's a house tied to him, it was a
5 house purchased using drug money. Is there any reason
6 to believe that it was him running a drug operation? Do
7 you think that's how he made his money?

8 JOHN ANTHONY: I don't -- I don't know the
9 details of it. I know -- I know he was -- he has
10 listed, like, that he -- that he had a business called,
11 like, Larson Consulting which -- which has, like, no,
12 you know, substance behind it online, but it looks very
13 well like it could be a --

14 SPENCER CORNELIA: Yeah.

15 JOHN ANTHONY: -- front.

16 SPENCER CORNELIA: The address is right down
17 the street from my house here, too, in Vegas.

18 JOHN ANTHONY: It looks -- it looks very well
19 like it could be a front for laundering money.

20 SPENCER CORNELIA: Yeah. I would love to
21 know the details. And, clearly, he's not going to be
22 one to share it with us. But there -- there is -- you
23 know, sometimes when you look into people, it's, like,
24 okay, there's some smoke here. There -- there's
25 something that we're not seeing and we won't know

1 programs are not delivering what's promised, or at least
2 the expectations of the students.

3 JOHN ANTHONY: Uh-huh. Yep. Yeah, he
4 also -- like, even his credentials. Like, someone said
5 in one of the YouTube comments, they provided proof
6 that, like -- that he never went to -- like, you know,
7 he never attended Chicago business school. He did,
8 like, some kind of online thing. And it -- it's --
9 there's just so much shady stuff. He -- he -- he's
10 always just building up, like, Oh, I have -- I have all
11 this money. I have all this knowledge and all this
12 stuff. And then he's -- he's putting up stuff on
13 Instagram with, like, it looks like a -- a tiny
14 apartment with like a -- a dingy little fridge and stuff
15 like that.

16 SPENCER CORNELIA. Yeah. So let's speak
17 about the bootcamp reviews. Do you still run bootcamps,
18 or at least pre-health event?

19 JOHN ANTHONY: Yep.

20 SPENCER CORNELIA: Were you running in-person
21 bootcamps?

22 JOHN ANTHONY: Yep.

23 SPENCER CORNELIA: Okay. So what -- I've
24 never done a bootcamp, but I'm -- obviously I'm familiar
25 with this -- the industry.

1 a false copyright strike on it within, like, 12 hours.
2 But I had a lawyer review it before I even put it out,
3 and when I fought back, I said they're abusing the
4 copyright system. RSD has put a whole bunch of strikes
5 on my channel abusing the copyright system, you know.
6 And -- and you deal with this stuff, too, when you --
7 when you take on these guys.

8 They -- they delete the comments. They try
9 to suppress things. And I've been -- I've been taking
10 them on for years and -- and they'll go and spread
11 rumors when guys are try- -- debating between my program
12 and the other program. They'll tell people that I'm a
13 rapist, for example. I've never been accused or charged
14 with rape. That situation with Derek did not involve
15 any sex in the case or any kind of rape accusation.

16 So, you know, like, it's very, very
17 frustrating that they -- they'll play, like, as low and
18 dirty as they possibly can, even to the point of setting
19 people up for arrests. Even to the point of using
20 intimidation and bullying and -- and threats and all
21 this stuff. And you have these guys that don't know any
22 better. Right? And they're -- everyone's just getting
23 kind of swept along, you know. And all these reviews
24 just involve the guys emptying their pockets and -- and
25 receiving nothing in return. And it's --

1 JOHN ANTHONY: Yeah.

2 SPENCER CORNELIA: And I find it really
3 unfortunate that these gurus can use vague surface level
4 concepts that sound good to a beginner. Right? If you
5 don't know anything about the stock market, you can make
6 it sound great. But then you funnel people into a
7 \$5,000 course, and it really upsets me.

8 JOHN ANTHONY: Yeah. Yeah. Someone -- I
9 made a note on the stock one. Someone said, I tuned in
10 to his courses where -- where he's selling the stocks
11 and shares program. It's concepts that I've seen
12 elsewhere, such as the Intelligent Investor Stock Market
13 Cash Flow by Andy Tanner. He just repackaged content and
14 then made it out -- he made himself out to be some kind
15 of genius because he studied business, but he doesn't
16 even have a real -- he never actually went to University
17 of Chicago. A lot of high-pressured tactics, getting
18 people to do things in order to get compliance.

19 I remember what my -- my thought was that I
20 had forgot before. It kind of ties in here. So I came
21 from this, like, purely from, like, you know, mastering
22 the game and optimizing and all this stuff. And then
23 when I started seeing, like, internet marketers and some
24 of their presentations and stuff like that, or just like
25 the scammers and the fake gurus, they're making

1 Another guy spent upwards of 20,000 for all
2 his expenses. Took -- took three programs with Derek.
3 Derek was a father figure afterwards. He realized he
4 got f-ed in the ass big time. I don't know if we're
5 allowed to talk like that on your channel, but I just
6 did.

7 This is a different guy. This is separate
8 guy, 27-year-old that -- having a mental breakdown after
9 the third program. Told -- told lots of shady stories
10 about Derek being a heavy racist and sociopath.

11 SPENCER CORNELIA: False prophets, man.

12 JOHN ANTHONY: Yeah. So, I mean, like, to
13 sum up, it's -- it's basically, like, all the -- all the
14 videos are just to build the -- to build the fake image
15 and get you to sign up for their courses. And he -- he
16 pads this stuff acting rich. Okay? Obviously, it's not
17 true. He's in, like, you know, tiny apartments with --
18 with dingy fridges and stuff like that. Say -- he --
19 he's always saying, Oh, I have this Ivy League degree.
20 You know, he didn't even attend a Chicago business
21 school. Some online thing.

22 He's trying to, like, hide all his, like,
23 criminal past. There's, like, tons of -- of shady
24 stuff. Why -- why is he running around with aliases and
25 burner phones and all this stuff. And -- and he's

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C E R T I F I C A T E

I, BECKY J. PARKER, do hereby certify that the foregoing pages constitute a full, true, and accurate transcript of the digital recording, all transcribed to the best of my skill and ability.

WITNESS my hand this 4th day of February, 2022.



BECKY J. PARKER, RPR, CCR

Nevada Certified Court Reporter No. 934

EXHIBIT

Declaration of Dale Buczowski

EXHIBIT

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10 *Attorneys for Plaintiffs Wealthy Inc. and*
11 *Dale Buczkowski*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 WEALTHY INC. and DALE
15 BUCZKOWSKI,

16 Plaintiffs,

17 v.

18 SPENCER CORNELIA, CORNELIA
19 MEDIA LLC, and CORNELIA
EDUCATION LLC,

20 Defendants.

Case No.: 2:21-cv-01173-JCM-EJY

**DECLARATION OF DALE
BUCZKOWSKI**

21
22 I, Dale Buczkowski, hereby state that I have personal knowledge of the facts as set forth
23 below. If called as a witness, I could and would testify as follows:

- 24 1. I am a citizen of the United States and am over eighteen (18) years of age.
25 2. I am a plaintiff in this action, and I make this declaration in connection with the Plaintiffs
26 Motion for Partial Summary Judgment. (the "Motion").
27
28

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Background

- 3. I graduated from the University of Chicago Booth School of Business with a Master of Business Administration (MBA) degree in 2015. A true and correct image of my diploma is annexed as Exhibit A.
- 4. I am the President and Co-Founder of Larson Consulting, founded in 2011, which is dedicated to helping leaders solve critical strategic issues, accelerate growth, and improve the reputation and brand of their organizations in the context of strongly held values.

Wealthy, Inc.’s Business

- 5. Wealthy Inc. ("Wealthy") was founded in 2019 and is a leading entrepreneurship, finance, business, real-estate and self-improvement company owned and operated by myself, under the federally registered trademark, Derek Moneyberg®.
- 6. Wealthy offers three entry level programs entitled Moneyberg® Mentoring, Markets Mastery, and Real Estate Riches. These programs focus on entrepreneurship, financial markets, and real-estate investing. These programs are currently offered at \$5,000 each.
- 7. Wealthy also offers its clients a program entitled Mastermind Network, which currently requires a \$20,000 initiation fee and a \$5,000 annual renewal fee. This program provides a monthly coaching call and a forum for top students to network and exchange ideas in a high value environment.
- 8. Wealthy also offers 1-ON-1 Training with Derek Moneyberg®.
- 9. Wealthy actively markets its courses on various social media channels, including YouTube, LLC (Derek Moneyberg), Instagram (@derekmoneyberg), Facebook (@derekmoneyberg), Twitter (@derekmoneyberg), LinkedIn (Derek Moneyberg), Spotify (The Derek Moneyberg Podcast), and Apple Podcast (The Derek Moneyberg Podcast).
- 10. At the time the Complaint was filed in this case, Wealthy's YouTube channel, Derek Moneyberg, had approximately 23.7K subscribers and over 1.2 million views, according to YouTube.

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1 11. Currently, Wealthy's YouTube channel, Derek Moneyberg, has approximately 138K
2 subscribers and over 4.9 million views.

3 12. Wealthy's YouTube channel, Derek Moneyberg, targets an audience interested in self-
4 improvement in the areas of entrepreneurship, finance, business, and real-estate.

5 13. I am and have been focused on growing my entrepreneurship, finance, business, and real-
6 estate focused clientele through Wealthy and the Derek Moneyberg® brand.

7 **DEFENDANTS' FALSE AND DEFAMATORY VIDEOS**

8 14. Between December 2020 and February 2021, Defendants, in collaboration with Mr.
9 Mulvehill, produced at least two videos on YouTube containing false and defamatory
10 statements about Mr. Buczkowski and the Derek Moneyberg® brand.

11 **False Statements That I Lied About My Educational Achievement**

12 15. The First and Second Videos include assertions that I lied about my educational
13 achievement.

14 16. The assertion that I lied about my level of educational achievement is false.

15 17. As noted above, I received an MBA from the University of Chicago Booth School of
16 Business in 2015. *See* Exhibit A.

17 **False Statements That I Laundered Money**

18 18. The Second Video includes assertions that I laundered money through my business Larson
19 Consulting.

20 19. The assertion that I or any of my businesses, including Larson Consulting, engaged in
21 money laundering is false.

22 **False Statements That I Manufactured/Sold Drugs**

23 20. The Second Video includes assertions that I manufactured and/or sold illegal drugs.

24 21. The assertion that I engaged in illicit drug manufacture and/or sale is false.

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22. The assertion that I engaged in illicit drug manufacture and/or sale appears to be based entirely on speculation by Defendants and Mr. Mulvehill about a prior litigation involving asset forfeiture of property owned by my deceased grandmother, in which I temporarily served as the executor of the estate. The litigation in question was resolved without any finding of wrongdoing following a decision by the Court of Appeals for the Eighth Circuit which reversed a decision of the District Court striking claims by the estate as untimely, *U.S. v. Real Properties Located at 7215 Longboat*, 750 F.3d 968 (8th Cir. 2014).

23. I never manufactured drugs, nor have I ever been arrested for a drug crime, much less charged with, or convicted of a drug crime.

False Statements That I Framed Mr. Mulvehill for His Arrest

24. The First and Second Videos include assertions that I framed Mr. Mulvehill for his 2013 arrest in Las Vegas, leading to four felony and four misdemeanor charges.

25. The assertion that I framed Mr. Mulvehill for Mr. Mulvehill's 2013 arrest involving four felony and four misdemeanor charges is false.

False Statements That I Was Involved in the Death of Mulvehill's Alleged Victim

26. The Second Video includes assertions that I was involved in the death of the woman who was the alleged victim in the arrest of Mr. Mulvehill.

27. The assertion that I was involved in the death of the woman who was the alleged victim in the arrest of Mr. Mulvehill for four felony and four misdemeanor charges is false.

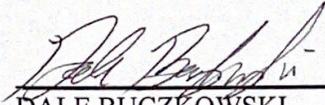
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PETERSON BAKER, PLLC
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28. I did not know the woman before Mr. Mulvehill allegedly attacked her, and I did not have any contact with her after Mr. Mulvehill allegedly victimized her.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed in Los Angeles California on this 30th day of September 2022.



DALE BUCZKOWSKI

EXHIBIT A

EXHIBIT A



THE UNIVERSITY OF CHICAGO

ON THE RECOMMENDATION OF THE FACULTY
AND BY VIRTUE OF THE AUTHORITY VESTED IN THEM
THE TRUSTEES OF THE UNIVERSITY HAVE CONFERRED ON

DALE MICHAEL BUCZKOWSKI

THE DEGREE OF

MASTER OF BUSINESS ADMINISTRATION

THE UNIVERSITY OF CHICAGO BOOTH SCHOOL OF BUSINESS

AND HAVE GRANTED THIS DIPLOMA AS EVIDENCE THEREOF
GIVEN IN THE CITY OF CHICAGO IN THE STATE OF ILLINOIS

IN THE UNITED STATES OF AMERICA IN THE YEAR

TWO THOUSAND AND FIFTEEN

ON THE THIRTEENTH DAY OF JUNE

Joseph H. ...
Chairman of the Board of Trustees

...
University Registrar



Robert J. ...
President of the University

Erin D. ...
Provost

Sumit ...
Dean

The University of Chicago

EXHIBIT

Defendant S enker Cornelia's Res onses to Plaintiffs' First Set of Interrogatories to Defendants Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

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Alex J. Shepard, NV Bar No. 13582
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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT SPENCER CORNELIA'S
RESPONSES TO PLAINTIFFS' FIRST
SET OF INTERROGATORIES TO
DEFENDANTS PURSUANT TO FRCP 33**

Pursuant to Fed. R. Civ. P. 26 and 33, Defendant Spencer Cornelia hereby respond to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") First Set of Interrogatories Pursuant to FRCP 33.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

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Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be implied or inferred. The fact that any request herein has been responded upon should not be taken as an admission, or a concession, of the existence of any facts set forth or assumed by such request, or that such response constitutes evidence of any fact thus set forth or assumed. All responses must be construed as given on the basis of present recollection.

GENERAL OBJECTIONS

1. Defendant objects to the subject interrogatories to the extent that they request the disclosure of information protected by the attorney-client privilege, the work-product doctrine, or any other recognized privilege or immunity.

2. Defendant objects to the subject interrogatories to the extent that they do not seek relevant information or are not proportional to the needs of the case. The providing of answers in response to any request is not to be deemed or construed as an admission by Defendant that the information is in fact relevant to this action.

3. Defendant objects to the subject interrogatories to the extent that they call for information not in the possession, custody, or control of Defendant.

4. To the extent words or phrases used in the requests are vague, ambiguous, or otherwise overbroad, Defendant shall respond in a manner in which he believes, in good faith, to be requested thereby.

5. Defendant states that discovery in this matter is continuing and ongoing and that it is possible that additional information responsive to the interrogatories will be identified subsequent to the date of this response.

6. All responses made herein are based upon the best knowledge, information, and belief held by Defendant at the time of the response.

7. Defendant objects to the Definitions to the extent they conflict with the definitions applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

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8. Defendant objects to the Instructions to the extent they impose any obligation beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

9. Defendant incorporates these General Objections into each and every specific response as if fully set forth therein.

Subject to and without waiving the foregoing General Objections, Defendant specifically responds to each numbered Interrogatory as follows:

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify the entity in the name of which the Spencer Cornelia YouTube channel is registered, including all contact information for such entity provided to or held by Google LLC, regarding the Spencer Cornelia YouTube channel.

RESPONSE TO INTERROGATORY NO. 1:

The channel is in the name of Spencer Cornelia. The email address associated with the channel is <spencer0cornelia@gmail.com>.

INTERROGATORY NO. 2:

Identify all financial accounts (including but not limited to any and all bank accounts, money market accounts, and brokerage accounts) now or previously receiving income from the Spencer Cornelia YouTube channel.

RESPONSE TO INTERROGATORY NO. 2:

Objection: This request is overbroad and is not proportional to the needs of the case. This request seeks all financial accounts that have received money from the Spencer Cornelia YouTube channel, not just financial accounts which Defendant owns or of which he is a beneficiary. To the extent this Interrogatory is limited to financial accounts evidencing income Defendant has received from the Spencer Cornelia YouTube channel, it does not seek information relevant to any party's claims or defenses.

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1 Notwithstanding the foregoing objections, Defendant responds as follows: Defendant owns
2 a Wells Fargo account that receives funds from the Spencer Cornelia YouTube Channel. {{I
3 recommend we not answer, and rest on objections }}

4 **INTERROGATORY NO. 3:**

5 Identify all financial accounts (including but not limited to any and all bank accounts,
6 money market accounts, and brokerage accounts) now or previously owned by CORNELIA
7 MEDIA LLC, and CORNELIA EDUCATION LLC that have received income from the Spencer
8 Cornelia YouTube channel.

9 **RESPONSE TO INTERROGATORY NO. 3:**

10 Objection: This Interrogatory is overbroad and is not proportional to the needs of the case.
11 This Interrogatory does not seek relevant information, as the subject financial accounts have no
12 bearing on Plaintiffs' claims.

13 Notwithstanding the foregoing objections, Defendant responds as follows: There are no
14 such accounts.

15 **INTERROGATORY NO. 4:**

16 Identify all social media and email accounts (including but not limited to Facebook,
17 YouTube, Twitter, Instagram, Reddit) you own (or owned) or control (or controlled) through
18 which you ever have communicated on the topic of any of the Plaintiffs or Derek Moneyberg.

19 **RESPONSE TO INTERROGATORY NO. 4:**

20 Objection: This Interrogatory is overbroad and unduly burdensome and is not proportional
21 to the needs of the case. It is not limited in scope to any of the statements at issue or any other
22 issue relevant to the parties' claims or defenses. It is also not limited to any relevant time period.

23 Notwithstanding the foregoing objections, Defendant responds as follows: Defendant has
24 spoken about Plaintiffs on his YouTube account and has communicated on the topics of Plaintiffs
25 or Derek Moneyberg using the email accounts <spencer0cornelia@gmail.com> and
26 <spencercornelialawsuit@gmail.com>.

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1 **INTERROGATORY NO. 5:**

2 Identify all persons or entities to whom or to which you ever have communicated on the
3 topic of any of the Plaintiffs or Derek Moneyberg.

4 **RESPONSE TO INTERROGATORY NO. 5:**

5 Objection: This Interrogatory is overbroad, unduly burdensome, and is not proportional to
6 the needs of the case. It is not limited in scope to any of the statements at issue or any other issue
7 relevant to the parties’ claims or defenses. It is also not limited to any relevant time period.

8 Notwithstanding the foregoing objections, Defendant responds as follows: John Anthony
9 Lifestyle, The Drip podcast, The Iced Coffee Hour Podcast, John Mulvehill, Graham Stephan, Jack
10 Selby, Stephen Findeisen, and Amish Patel.

11 **INTERROGATORY NO. 6:**

12 Identify and describe all facts that support Your contention that the statements complained
13 of in the Complaint are true or substantially true.

14 **RESPONSE TO INTERROGATORY NO. 6:**

15 As to all statements at issue, the representations of Mr. Mulvehill in the First and Second
16 Videos, produced as Bates Nos. COR000001 and COR000002. Responsive information is also
17 contained within documents previously produced as Bates Nos. COR000078-COR000084.

18 As to the statements regarding Larson Consulting, this entity only has one officer, Dale
19 Buczkowski. It has 1 share and a total authorized capital of \$100. There is no signage outside the
20 address listed on the Nevada Secretary of State’s website for the company, and there is only a “no
21 soliciting” sign on its door. The company has a Facebook page, but it does not appear to have
22 posted any content since November 15, 2013. It has 36 followers. It lists a website,
23 <larsonconsultinginc.com>, but the site is under construction and does not display any content.
24 The current registrant did not acquire the domain until June 22, 2020. However, <archive.org>’s
25 Wayback Machine shows that it was displaying content for Plaintiffs’ Larson Consulting business
26 from April 2013 to January 2019. During this time, the site prominently displayed the name “Dale
27

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1 Buczkowski.” There was very little content on the site at this time, as it merely displayed some
2 mundane paragraphs about desirable characteristics such as “integrity” and “optimism,” and
3 contact information for the company. Based on these facts it appears that, at least as of the time
4 the videos at issue were published, Larson Consulting does not provide any legitimate goods or
5 services.

6 As for the statements regarding Buczkowski’s involvement in a drug operation,
7 Buczkowski made claims for property that was subject to civil asset forfeiture claims in *United*
8 *States v. 7212 Longboat Drive*, Case No. 4:12-cv-00484 (S.D. Iowa) and *United States v. 7215*
9 *Longboat Drive*, Case No. 4:12-cv-00487 (S.D. Iowa) (later consolidated). These documents have
10 previously been produced as Bates Nos. COR000087-COR000115. In these cases, The U.S. filed
11 civil forfeiture actions against 5 Iowa properties based on allegation they were purchased with, or
12 used to facilitate, drug crimes. The civil asset forfeiture complaint asserted that Daryl Buczkowski,
13 Buczkowski’s father and son-in-law of Mariani, “has a criminal history that includes a conviction
14 . . . for manufacturing and delivery of cocaine for which he was sentenced to a term of
15 imprisonment for 15 years.” (Complaint at ¶ 11.) It alleged that Daryl was the registered agent of
16 a company whose white vehicle was used to attempt to retrieve equipment from a storage unit that
17 was later searched and found to contain equipment for an indoor marijuana grow operation. (*Id.* at
18 ¶¶ 12-14.) It further alleged that a neighboring property, owned by a friend of Buczkowski,
19 Timothy Lantz, contained mail addressed to Buczkowski, credit cards in Plaintiff’s name,
20 Buczkowski’s tax returns, and that the neighboring property was being used to operate a marijuana
21 grow operation. (*Id.* at ¶¶ 15-20.) Lantz was also indicted for his involvement in this scheme.
22 Considering these facts, Defendant thinks it highly likely that Buczkowski was involved in a
23 marijuana grow operation. The fact that these civil asset forfeiture claims were later settled without
24 any finding of criminal wrongdoing does not constitute a finding that Buczkowski was uninvolved
25 in this activity.

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Regarding Buczkowski engaging in illegal activity in helping his clients obtain credit, not authoring his own content, and coercing his clients to provide testimonials, documents with information regarding the truth of such statements can be found at documents previously produced as Bates Nos. COR000011-COR000084, as well as COR000151.

INTERROGATORY NO. 7:

Identify and describe all facts that support Your contention that Defendants knew or had a significant subjective belief that the statements claimed to be actionable in the complaint were true or substantially true at the time they were made.

RESPONSE TO INTERROGATORY NO. 7:

As to all statements at issue, the representations of Mr. Mulvehill in the First and Second Videos, produced as Bates Nos. COR000001 and COR000002. Defendant found Mr. Mulvehill to be a credible source of information regarding Plaintiffs.

As to the statements regarding Larson Consulting, this entity only has one officer, Dale Buczkowski. It has 1 share and a total authorized capital of \$100. There is no signage outside the address listed on the Nevada Secretary of State’s website for the company, and there is only a “no soliciting” sign on its door. The company has a Facebook page, but it does not appear to have posted any content since November 15, 2013. It has 36 followers. It lists a website, <larsonconsultinginc.com>, but the site is under construction and does not display any content. The current registrant did not acquire the domain until June 22, 2020. However, <archive.org>’s Wayback Machine shows that it was displaying content for Plaintiffs’ Larson Consulting business from April 2013 to January 2019. During this time, the site prominently displayed the name “Dale Buczkowski.” There was very little content on the site at this time, as it merely displayed some mundane paragraphs about desirable characteristics such as “integrity” and “optimism,” and contact information for the company. Based on these facts it appears that, at least as of the time the videos at issue were published, Larson Consulting did not provide any legitimate goods or services. A company that did not appear to do anything legitimate being owned and operated

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1 apparently only by Buczkowski was a strong indicator that Larson Consulting was not a legitimate
2 business and could have existed for the purpose of laundering money.

3 As for the statements regarding Buczkowski’s involvement in a drug operation,
4 Buczkowski made claims for property that was subject to civil asset forfeiture claims in *United*
5 *States v. 7212 Longboat Drive*, Case No. 4:12-cv-00484 (S.D. Iowa) and *United States v. 7215*
6 *Longboat Drive*, Case No. 4:12-cv-00487 (S.D. Iowa) (later consolidated). These documents have
7 previously been produced as Bates Nos. COR000087-COR000115. In these cases, The U.S. filed
8 civil forfeiture actions against 5 Iowa properties based on allegation they were purchased with, or
9 used to facilitate, drug crimes. The civil asset forfeiture complaint asserted that Daryl Buczkowski,
10 Buczkowski’s father and son-in-law of Mariani, “has a criminal history that includes a conviction
11 . . . for manufacturing and delivery of cocaine for which he was sentenced to a term of
12 imprisonment for 15 years.” (Complaint at ¶ 11.) It alleged that Daryl was the registered agent of
13 a company whose white vehicle was used to attempt to retrieve equipment from a storage unit that
14 was later searched and found to contain equipment for an indoor marijuana grow operation. (*Id.* at
15 ¶¶ 12-14.) It further alleged that a neighboring property, owned by a friend of Buczkowski,
16 Timothy Lantz, contained mail addressed to Buczkowski, credit cards in Plaintiff’s name,
17 Buczkowski’s tax returns, and that the neighboring property was being used to operate a marijuana
18 grow operation. (*Id.* at ¶¶ 15-20.) Lantz was also indicted for his involvement in this scheme.
19 Defendant found nothing implausible or not credible about the facts alleged in these documents.
20 Considering these facts, Defendant thinks it highly likely that Buczkowski was involved in a
21 marijuana grow operation. The fact that these civil asset forfeiture claims were later settled without
22 any finding of criminal wrongdoing does not constitute a finding that Buczkowski was uninvolved
23 in this activity.

24 Regarding Buczkowski engaging in illegal activity in helping his clients obtain credit, not
25 authoring his own content, and coercing his clients to provide testimonials, documents with
26 information regarding the truth of such statements can be found at documents previously produced
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1 as Bates Nos. COR000011-COR000043. Defendant found that Mr. Mulvehill was a credible
2 source of information regarding Plaintiffs, as he credibly claimed to be personally familiar with
3 Buczkowski and he showed Defendant correspondence with individuals who appeared to be
4 former clients or employees of Plaintiffs. Defendant had no reason to doubt the authenticity of this
5 correspondence or the claims made in them. Furthermore, Defendant viewed a video interview
6 with Mr. Mulvehill and a man named Rohit (produced as Bates Nos. COR000151), who claimed
7 to be a former contractor for Plaintiffs, where Rohit made several claims about how deceptive and
8 fraudulent Plaintiffs' business practices are. Defendant found Rohit to be highly credible and had
9 no reason to doubt his claims regarding Plaintiffs.

10 **INTERROGATORY NO. 8:**

11 Identify all efforts made to investigate whether the statements claimed to be actionable in
12 the complaint are true or substantially.

13 **RESPONSE TO INTERROGATORY NO. 8:**

14 Defendant, through his own investigation or by being provided this information from third
15 parties including Mr. Mulvehill, possessed all the information referred to in his response to
16 Interrogatory No. 7 prior to publishing the videos at issue. Additionally, prior to publication,
17 Defendant reviewed a video Mr. Mulvehill published on his YouTube channel, John Anthony
18 Lifestyle, on May 10, 2020, which repeats many of the claims made in the First and Second
19 Videos regarding Plaintiffs. This May 10, 2020 video, however, has since been removed.

20 **INTERROGATORY NO. 9:**

21 Identify all statements claimed to be actionable in the complaint that you now believe are
22 false.

23 **RESPONSE TO INTERROGATORY NO. 9:**

24 The only statements alleged in the Complaint Defendant now believes to be false are those
25 concerning the legitimacy of Buczkowski's education credentials. Defendant did not believe such
26 statements to be false at the time the videos at issue were published.

1 **INTERROGATORY NO. 10:**

2 Identify and describe the substance of all discussions you have had with Mr. Mulvehill
3 about this lawsuit, including but not limited to any efforts to raise money or find evidence
4 supporting your defenses in this lawsuit.

5 **RESPONSE TO INTERROGATORY NO. 10:**

6 Objection: This Interrogatory is overbroad, unduly burdensome, and is not proportional
7 to the needs of the case, as discussions regarding fundraising efforts have no bearing on any
8 party's claims or defenses.

9 Notwithstanding the foregoing objections, Defendant responds as follows: Defendant has
10 not had any discussions with Mr. Mulvehill regarding fundraising efforts. Discussions regarding
11 finding evidence supporting Defendant's defenses in this lawsuit are found in documents with
12 Bates Nos. COR000007-COR000043 and COR000078-COR000084.

13 **INTERROGATORY NO. 11:**

14 Identify and describe the substance of all discussions you have had about any of the
15 plaintiffs, Derek Moneyberg, or this lawsuit, including but not limited to any efforts to raise
16 money for the defense of or to find evidence supporting your defenses in this lawsuit, with the
17 following individuals: (1) Graham Stephan; (2) Jack Selby; (3) Stephen Findeisen (aka.,
18 Coffeezilla); and (4) Amish Patel.

19 **RESPONSE TO INTERROGATORY NO. 11:**

20 Objection: This Interrogatory is overbroad, unduly burdensome, and is not proportional
21 to the needs of the case. Discussions regarding fundraising efforts have no bearing on any party's
22 claims or defenses. This Interrogatory is not limited in scope to the statements at issue in this case
23 or any other issue relevant to the parties' claims or defenses. This Interrogatory is also not limited
24 to any relevant time period.

25 Notwithstanding the foregoing objections, Defendant responds as follows: The requested
26 information can be found by reviewing documents produced as Bates Nos. COR000004-

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COR000006, WEALTHY000184-WEALTHY000332, and WEALTHY000388-WEALTHY000393.

INTERROGATORY NO. 12:

Identify any information you have about the current location of or ways to communicate with, Mr. Mulvehill a/k/a John Anthony.

RESPONSE TO INTERROGATORY NO. 12:

Objection: This request seeks the address and contact information of a third-party witness who has filed a motion to quash a subpoena seeking similar information. Mr. Mulvehill’s contact information is not relevant to any party’s claims or defenses and the deadline to amend the pleadings and add parties has passed, meaning this Interrogatory is not proportional to the needs of the case.

Notwithstanding the foregoing objections, Defendant responds as follows: Defendant has been informed that Mr. Mulvehill lives in Brazil, but has no further information regarding his whereabouts.

Dated: March 21, 2022.

As to Objections,
/s/ Alex J. Shepard
Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

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Case No. 2:21-cv-01173-JCM-EJY

VERIFICATION OF RESPONSES TO INTERROGATORIES

I, Spencer Cornelia, have reviewed the foregoing responses to Plaintiffs Wealthy Inc. and Dale Buczkowski’s First Set of Interrogatories Pursuant to FRCP 33, and I hereby declare under penalty of perjury that the foregoing responses are true and correct to the best of my knowledge and understanding.

Executed on: 3/21/2022 (date).

DocuSigned by:
Spencer Cornelia
Spencer Cornelia

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Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
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Culhane Meadows PLLC
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888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Suzanne Levenson
Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant S enker Cornelia s Res onses to Plaintiff s First Set of Re uests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT SPENCER CORNELIA'S
RESPONSES TO PLAINTIFFS' FIRST
SET OF REQUESTS FOR ADMISSION
PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Spencer Cornelia hereby respond to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") First Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject interrogatories to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which he believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that document WEALTHY000058-WEALTHY000089 is a true and authentic
10 transcript of the First Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 2:**

14 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
15 First video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

17 Denied.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that document WEALTHY000448-WEALTHY000461 is a true and authentic
20 transcript of the First Video.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Denied.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that document WEALTHY000184-WEALTHY000201 is a true and authentic
25 transcript of the Video entitled “Spencer Cornelia SUED by a Pick Up Artist?” appearing on the
26 YouTube channel “The Drip” and produced by Plaintiffs as document WEALTHY000202.

RANDAZZA | LEGAL GROUP

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 Admitted.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that document WEALTHY000212-WEALTHY000255 is a true and authentic
5 transcript of the Video entitled “Getting Sued By a Fake Guru | Spencer Cornelia” and produced
6 by Plaintiffs as document WEALTHY000256.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 6:**

10 Admit that You posted the following comment in the comment section of the YouTube
11 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
12 LMAOOO | RSD Derek” shown in document WEALTHY000389:

13 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
14 immediate termination. In the email, Instagram made it clear that Derek is at least
15 50 pounds away from appeal court.”

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

17 Admitted.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that You deleted the following comment from the comment section of the YouTube
20 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
21 LMAOOO | RSD Derek” shown in document WEALTHY000389:

22 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
23 immediate termination. In the email, Instagram made it clear that Derek is at least
24 50 pounds away from appeal court.”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

26 Admitted.

27 **REQUEST FOR ADMISSION NO. 8:**

1 Admit that You posted the following comment in the comment section of a YouTube
2 video after the present lawsuit was filed:

3 “filed in Vegas, lawyer said it might be tricky as something about the judge isn’t
4 favorable to anti-slapp. i’m hoping for quick dismissal for sure since this is certainly
5 a bullying case. I didn’t even make the claims, my guest did (in the videos related
6 to the case).”

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 9:**

10 Admit that You made the following statement on YouTube video after the present lawsuit
11 was filed:

12 “While on the phone with my lawyer, we were discussing my case and the strategy
13 will use to prove I’m not guilty of all the claims. I’m obviously going to keep this
14 very brief and summarize the call, but I essentially asked him when he’s like to hear
15 the mountains of proof I accumulated over the last two weeks, proving that the
16 lawsuit has as many flaws as the client of a super greedy plastic surgeon, Hey,
17 lawyer, I have screenshots, emails, documents, You tell me what you need. Then I
18 learned that lawsuits are more of a cat and mouse game, as opposed to- “Here’s the
19 evidence, I’m not guilty, can you leave me along now, Plaintiff?” Now that I
20 understand law 100 times better than I did previously, I’m going to share with you
21 why fake gurus on social media are able to basically get away with whatever they
22 want right now.”

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

24 Admitted.

25 **REQUEST FOR ADMISSION NO. 10:**

26 Admit that John Mulvehill (a.k.a. John Anthony) currently resides outside the United
27 States.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Admitted that Mr. Mulvehill has represented to Defendant that he lives outside the United
States.

RANDAZZA | LEGAL GROUP

1 **REQUEST FOR ADMISSION NO. 11:**

2 Admit that you have collaborated with John Mulvehill (a.k.a. John Anthony) since this
3 lawsuit began.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

5 Objection: The term “collaborated with” is vague and ambiguous such that it is impossible
6 to respond to this request. This request is overbroad, unduly burdensome, and is not proportional
7 to the needs of the case. It is not limited in scope to any of the statements at issue or any other
8 issues relevant to the parties’ claims or defenses. Post-suit conduct does not have any relevance
9 to the parties’ claims or defenses, the Complaint contains no reference to such conduct, and the
10 deadline to amend the pleadings has passed.

11 Notwithstanding the foregoing objections, Defendant responds as follows: Admitted that
12 Defendant and Mr. Mulvehill have appeared in videos together since this lawsuit began.

13 Dated: March 21, 2022.

14 Respectfully Submitted,

15 /s/ Alex J. Shepard

16 Marc J. Randazza, NV Bar No. 12265

17 Alex J. Shepard, NV Bar No. 13582

18 RANDAZZA LEGAL GROUP, PLLC

19 2764 Lake Sahara Drive, Suite 109

20 Las Vegas, NV 89117

21 Attorneys for Defendants

22 Spencer Cornelia, Cornelia Media LLC,

23 and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
<nbaker@petersonbaker.com>
701 S. 7th Street
Las Vegas, NV 89101

Culhane Meadows PLLC
Jeffrey Vockrodt, Esq.
<jvockrodt@cm.law>
David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Suzanne Levenson
Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant Cornelia Media LLC's Responses to Plaintiffs' First Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Telephone: 702-420-2001
Facsimile: 305-437-7662
ecf@randazza.com

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA MEDIA
LLC'S RESPONSES TO PLAINTIFFS'
FIRST SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Media LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") First Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject interrogatories to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which it believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that document WEALTHY000058-WEALTHY000089 is a true and authentic
10 transcript of the First Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 2:**

14 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
15 First video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

17 Denied.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that document WEALTHY000448-WEALTHY000461 is a true and authentic
20 transcript of the First Video.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Denied.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that document WEALTHY000184-WEALTHY000201 is a true and authentic
25 transcript of the Video entitled “Spencer Cornelia SUED by a Pick Up Artist?” appearing on the
26 YouTube channel “The Drip” and produced by Plaintiffs as document WEALTHY000202.

RANDAZZA | LEGAL GROUP

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 Admitted.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that document WEALTHY000212-WEALTHY000255 is a true and authentic
5 transcript of the Video entitled “Getting Sued By a Fake Guru | Spencer Cornelia” and produced
6 by Plaintiffs as document WEALTHY000256.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 6:**

10 Admit that You posted the following comment in the comment section of the YouTube
11 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
12 LMAOOO | RSD Derek” shown in document WEALTHY000389:

13 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
14 immediate termination. In the email, Instagram made it clear that Derek is at least
15 50 pounds away from appeal court.”

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

17 Admitted.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that You deleted the following comment from the comment section of the YouTube
20 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
21 LMAOOO | RSD Derek” shown in document WEALTHY000389:

22 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
23 immediate termination. In the email, Instagram made it clear that Derek is at least
24 50 pounds away from appeal court.”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

26 Admitted.

RANDAZZA | LEGAL GROUP

REQUEST FOR ADMISSION NO. 8:

Admit that You posted the following comment in the comment section of a YouTube video after the present lawsuit was filed:

“filed in Vegas, lawyer said it might be tricky as something about the judge isn’t favorable to anti-slapp. i’m hoping for quick dismissal for sure since this is certainly a bullying case. I didn’t even make the claims, my guest did (in the videos related to the case).”

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Admitted.

REQUEST FOR ADMISSION NO. 9:

Admit that You made the following statement on YouTube video after the present lawsuit was filed:

“While on the phone with my lawyer, we were discussing my case and the strategy will use to prove I’m not guilty of all the claims. I’m obviously going to keep this very brief and summarize the call, but I essentially asked him when he’s like to hear the mountains of proof I accumulated over the last two weeks, proving that the lawsuit has as many flaws as the client of a super greedy plastic surgeon, Hey, lawyer, I have screenshots, emails, documents, You tell me what you need. Then I learned that lawsuits are more of a cat and mouse game, as opposed to- “Here’s the evidence, I’m not guilty, can you leave me along now, Plaintiff?” Now that I understand law 100 times better than I did previously, I’m going to share with you why fake gurus on social media are able to basically get away with whatever they want right now.”

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Admitted.

REQUEST FOR ADMISSION NO. 10:

Admit that John Mulvehill (a.k.a. John Anthony) currently resides outside the United States.

///

///

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

2 Admitted that Mr. Mulvehill has represented to Defendant that he lives outside the United
3 States.

4 **REQUEST FOR ADMISSION NO. 11:**

5 Admit that you have collaborated with John Mulvehill (a.k.a. John Anthony) since this
6 lawsuit began.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

8 Objection: The term “collaborated with” is vague and ambiguous such that it is impossible
9 to respond to this request. This request is overbroad, unduly burdensome, and is not proportional
10 to the needs of the case. It is not limited in scope to any of the statements at issue or any other
11 issues relevant to the parties’ claims or defenses. Post-suit conduct does not have any relevance
12 to the parties’ claims or defenses, the Complaint contains no reference to such conduct, and the
13 deadline to amend the pleadings has passed.

14 Notwithstanding the foregoing objections, Defendant responds as follows: Admitted that
15 Defendant and Mr. Mulvehill have appeared in a video together since this lawsuit began.

16 Dated: March 21, 2022.

17 Respectfully Submitted,

18 /s/ Alex J. Shepard

19 Marc J. Randazza, NV Bar No. 12265

20 Alex J. Shepard, NV Bar No. 13582

21 RANDAZZA LEGAL GROUP, PLLC

22 2764 Lake Sahara Drive, Suite 109

23 Las Vegas, NV 89117

24 Attorneys for Defendants

25 Spencer Cornelia, Cornelia Media LLC,

26 and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
<nbaker@petersonbaker.com>
701 S. 7th Street
Las Vegas, NV 89101

Culhane Meadows PLLC
Jeffrey Vockrodt, Esq.
<jvockrodt@cm.law>
David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Suzanne Levenson

Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant Cornelia Education LLC's Responses to Plaintiffs' First Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Telephone: 702-420-2001
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ecf@randazza.com

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,
Plaintiff,
v.
SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,
Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA EDUCATION
LLC’S RESPONSES TO PLAINTIFFS’
FIRST SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Education LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski’s (collectively, “Plaintiffs”) First Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject interrogatories to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which it believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that document WEALTHY000058-WEALTHY000089 is a true and authentic
10 transcript of the First Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 2:**

14 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
15 First video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

17 Denied.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that document WEALTHY000448-WEALTHY000461 is a true and authentic
20 transcript of the First Video.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Denied.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that document WEALTHY000184-WEALTHY000201 is a true and authentic
25 transcript of the Video entitled “Spencer Cornelia SUED by a Pick Up Artist?” appearing on the
26 YouTube channel “The Drip” and produced by Plaintiffs as document WEALTHY000202.

RANDAZZA | LEGAL GROUP

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 Admitted.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that document WEALTHY000212-WEALTHY000255 is a true and authentic
5 transcript of the Video entitled “Getting Sued By a Fake Guru | Spencer Cornelia” and produced
6 by Plaintiffs as document WEALTHY000256.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 6:**

10 Admit that You posted the following comment in the comment section of the YouTube
11 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
12 LMAOOO | RSD Derek” shown in document WEALTHY000389:

13 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
14 immediate termination. In the email, Instagram made it clear that Derek is at least
15 50 pounds away from appeal court.”

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

17 Admitted.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that You deleted the following comment from the comment section of the YouTube
20 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
21 LMAOOO | RSD Derek” shown in document WEALTHY000389:

22 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
23 immediate termination. In the email, Instagram made it clear that Derek is at least
24 50 pounds away from appeal court.”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

26 Admitted.

RANDAZZA | LEGAL GROUP

REQUEST FOR ADMISSION NO. 8:

Admit that You posted the following comment in the comment section of a YouTube video after the present lawsuit was filed:

“filed in Vegas, lawyer said it might be tricky as something about the judge isn’t favorable to anti-slapp. i’m hoping for quick dismissal for sure since this is certainly a bullying case. I didn’t even make the claims, my guest did (in the videos related to the case).”

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Admitted.

REQUEST FOR ADMISSION NO. 9:

Admit that You made the following statement on YouTube video after the present lawsuit was filed:

“While on the phone with my lawyer, we were discussing my case and the strategy will use to prove I’m not guilty of all the claims. I’m obviously going to keep this very brief and summarize the call, but I essentially asked him when he’s like to hear the mountains of proof I accumulated over the last two weeks, proving that the lawsuit has as many flaws as the client of a super greedy plastic surgeon, Hey, lawyer, I have screenshots, emails, documents, You tell me what you need. Then I learned that lawsuits are more of a cat and mouse game, as opposed to- “Here’s the evidence, I’m not guilty, can you leave me along now, Plaintiff?” Now that I understand law 100 times better than I did previously, I’m going to share with you why fake gurus on social media are able to basically get away with whatever they want right now.”

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Admitted.

REQUEST FOR ADMISSION NO. 10:

Admit that John Mulvehill (a.k.a. John Anthony) currently resides outside the United States.

///

///

RANDAZZA | LEGAL GROUP

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

2 Admitted that Mr. Mulvehill has represented to Defendant that he lives outside the United
3 States.

4 **REQUEST FOR ADMISSION NO. 11:**

5 Admit that you have collaborated with John Mulvehill (a.k.a. John Anthony) since this
6 lawsuit began.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

8 Objection: The term “collaborated with” is vague and ambiguous such that it is impossible
9 to respond to this request. This request is overbroad, unduly burdensome, and is not proportional
10 to the needs of the case. It is not limited in scope to any of the statements at issue or any other
11 issues relevant to the parties’ claims or defenses. Post-suit conduct does not have any relevance
12 to the parties’ claims or defenses, the Complaint contains no reference to such conduct, and the
13 deadline to amend the pleadings has passed.

14 Notwithstanding the foregoing objections, Defendant responds as follows: Admitted that
15 Defendant and Mr. Mulvehill have appeared in a video together since this lawsuit began.

16 Dated: March 21, 2022.

17 Respectfully Submitted,

18 /s/ Alex J. Shepard
19 Marc J. Randazza, NV Bar No. 12265
20 Alex J. Shepard, NV Bar No. 13582
21 RANDAZZA LEGAL GROUP, PLLC
22 2764 Lake Sahara Drive, Suite 109
23 Las Vegas, NV 89117

24 Attorneys for Defendants
25 Spencer Cornelia, Cornelia Media LLC,
26 and Cornelia Education LLC
27

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
<nbaker@petersonbaker.com>
701 S. 7th Street
Las Vegas, NV 89101

Culhane Meadows PLLC
Jeffrey Vockrodt, Esq.
<jvockrodt@cm.law>
David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Suzanne Levenson
Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant Sencer Cornelia's Responses to Plaintiffs' Second Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Telephone: 702-420-2001
Facsimile: 305-437-7662
ecf@randazza.com

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT SPENCER CORNELIA'S
RESPONSES TO PLAINTIFFS' SECOND
SET OF REQUESTS FOR ADMISSION
PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Spencer Cornelia hereby respond to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") Second Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject requests to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which he believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

8. Defendant objects to the Instructions to the extent they impose any obligation beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

9. Defendant incorporates these General Objections into each and every specific response as if fully set forth therein.

Subject to and without waiving the foregoing General Objections, Defendant specifically responds to each numbered Request for Admission as follows:

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 12:

Admit that document WEALTHY000116-000172 is a true and authentic transcript of the Second Video.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Admitted.

REQUEST FOR ADMISSION NO. 13:

Admit that document WEALTHY000448-000461 is a true and authentic transcript of the Third video.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Admitted.

Dated: June 10, 2022.

Respectfully Submitted,

/s/ Alex J. Shepard
Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 10, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
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Culhane Meadows PLLC
Jeffrey Vockrodt, Esq.
<jvockrodt@cm.law>
David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Brittani M. Holt
Employee,
Randazza Legal Group, PLLC

RANDAZZA | LEGAL GROUP

EXHIBIT

Defendant Cornelia Media LLC's Responses to Plaintiffs' Second Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

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Alex J. Shepard, NV Bar No. 13582
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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,
Plaintiff,
v.
SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,
Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA MEDIA
LLC’S RESPONSES TO PLAINTIFFS’
SECOND SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Media LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski’s (collectively, “Plaintiffs”) Second Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject requests to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which it believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

RANDAZZA | LEGAL GROUP

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 12:**

9 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
10 Second Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 13:**

14 Admit that document WEALTHY000448-000461 is a true and authentic transcript of the
15 Third video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

17 Admitted.

18 Dated: June 10, 2022.

19 Respectfully Submitted,

20 /s/ Alex J. Shepard
21 Marc J. Randazza, NV Bar No. 12265
22 Alex J. Shepard, NV Bar No. 13582
23 RANDAZZA LEGAL GROUP, PLLC
24 2764 Lake Sahara Drive, Suite 109
25 Las Vegas, NV 89117

26 Attorneys for Defendants
27 Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 10, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

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Tamara Beatty Peterson, Esq.
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Respectfully submitted,

/s/ Brittani M. Holt
Employee,
Randazza Legal Group, PLLC

RANDAZZA | LEGAL GROUP

EXHIBIT

Defendant Cornelia Education LLC's Responses to Plaintiffs' Second Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,
Plaintiff,
v.
SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,
Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA EDUCATION
LLC’S RESPONSES TO PLAINTIFFS’
SECOND SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Education LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski’s (collectively, “Plaintiffs”) Second Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

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2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

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20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

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23 belief held by Defendant at the time of the response.

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REQUEST FOR ADMISSION NO. 13:

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RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Admitted.

Dated: June 10, 2022.

Respectfully Submitted,

/s/ Alex J. Shepard
Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
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Las Vegas, NV 89117

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 10, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
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Nikki L. Baker, Esq.
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David Jacoby, Esq.
<djacoby@cm.law>
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New York, NY 10044

Respectfully submitted,

/s/ Brittani M. Holt
Employee,
Randazza Legal Group, PLLC

RANDAZZA | LEGAL GROUP

EXHIBIT

Declaration of Tamara Beatty Peterson

EXHIBIT

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702.786.1001

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888 Main Street, #543
9 New York, NY 10044
Telephone: 917.853.0057

10 *Attorneys for Plaintiffs Wealthy Inc. and*
11 *Dale Buczkowski*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 WEALTHY INC. and DALE
15 BUCZKOWSKI,

16 Plaintiffs,

17 v.

18 SPENCER CORNELIA, CORNELIA
19 MEDIA LLC, and CORNELIA
EDUCATION LLC,

20 Defendants.

Case No.: 2:21-cv-01173-JCM-EJY

**DECLARATION OF TAMARA BEATTY
PETERSON**

21 I, Tamara Beatty Peterson, hereby declare under penalty of perjury, as follows:
22

23 1. I am an attorney, duly licensed to practice law in the State of Nevada and counsel
24 of record for Dale Buczkowski and Wealthy Inc. ("Plaintiffs"). I make this Declaration in support
25 of Plaintiffs' Motion for Partial Summary Judgment ("Motion"). I have personal knowledge of the
26 facts set forth below, and if called upon to do so, am competent to testify thereto.
27
28

INDEX OF EXHIBITS

Exhibit Number	Title
1.	Excerpts of Transcription of YouTube Video The Authentic or Charlatan
2.	Excerpts of Transcription of YouTube Video Derek Moneyberg – Fake Guru
3.	Declaration of Dale Buczkowski
4.	Defendant Spencer Cornelia’s Responses to Plaintiffs’ First Set of Interrogatories to Defendants Pursuant to FRCP 33
5.	Defendant Spencer Cornelia’s Responses to Plaintiff’s First Set of Requests for Admission Pursuant to FRCP 36
6.	Defendant Cornelia Media LLC’s Responses to Plaintiffs’ First Set of Requests for Admission Pursuant to FRCP 36
7.	Defendant Cornelia Education LLC’s Responses to Plaintiffs’ First Set of Requests for Admission Pursuant to FRCP 36
8.	Defendant Spencer Cornelia’s Responses to Plaintiffs’ Second Set of Requests for Admission Pursuant to FRCP 36
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10.	Defendant Cornelia Education LLC’s Responses to Plaintiffs’ Second Set of Requests for Admission Pursuant to FRCP 36
11.	Declaration of Tamara Beatty Peterson

PETERSON BAKER, PLLC
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EXHIBIT

Excer ts of Transcri tion of YouTube Video The Authentic or Charlatan

EXHIBIT

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TRANSCRIPTION OF YOUTUBE VIDEO

11

THE AUTHENTIC OR CHARLATAN

12

Saturday, December 19, 2020

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Proceedings recorded by electronic sound recording;

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Transcript produced by transcription service.

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24

Transcribed by: BECKY J. PARKER, RPR, CCR

25

Nevada Certified Court Reporter No. 934

1 buy more stuff, okay, which is fine if the content
2 works.

3 Now, here's the big smoking gun. He
4 outsources 100 percent of his content. Yes,
5 100 percent. And not only that, but to little kids.
6 Okay? This guy that I spoke to is 21. He just got
7 through with college. Okay? Didn't know a whole lot
8 about business, has no real-world professional
9 experience. He wrote 100 percent of Derek's business
10 mentorship. Yes, 100 percent.

11 Derek goes on, I'm Derek Moneyberg. I have
12 this University of Chicago degree, okay, which is not
13 even true. He attended some online classes. Most of
14 what he says is a full fabrication. Literally,
15 100 percent of his content is outsourced. Okay? So
16 he's having guys research stuff about business, about
17 stocks, about real estate.

18 I showed you the screenshots that were
19 shared. Basically he has, for his real estate
20 mentorship program coming in January, he has -- he has
21 it being written by a 19-year-old Romanian kid who
22 literally in the screenshots is, like, Hey, I know
23 nothing about real estate. I'm going to start doing
24 some research.

25 So what he's having these guys do, what

1 into the full details, but what he -- what he's saying
2 is that tons of guys that couldn't afford it are getting
3 signed up for credit cards and loans that they -- that
4 they know for a fact they can't repay, okay, which is
5 illegal. Okay? They're not doing the lending
6 themselves, but they're putting them in contact.
7 They're coercing them heavily, which is illegal, to take
8 out loans and credit cards that they cannot afford.
9 They know for a fact they can't afford, with massive
10 interest rates and penalties and all this stuff,
11 which -- so these -- and it's ruining guys' lives.
12 They're getting them to max the credit cards too.

13 So when they get this card, they say, Okay,
14 now perfect, you have a 10K line. You can get into
15 these two mentorships. Or if they get approved for
16 more, okay, we can get you into these three mentorships.
17 Look, now -- now your life is going to be for the
18 better. You're going to make all that money back in no
19 time. No, they're not. Okay? Now their life is
20 ruined.

21 And he gave me examples, and I've gotten
22 emails of all kinds of examples of guys literally having
23 mental breakdowns. Okay? Literally lives being
24 destroyed. Okay? That's why I don't give a f- saying
25 all this stuff. Like, they came after me, trying to set

1 me up for an arrest in the past -- in the past, which
2 we'll discuss in another video, that motherf-er. Okay,
3 but --

4 SPENCER CORNELIA: Which, by the way, like,
5 John, share with me. He gets email -- like, understand
6 the -- the venom he comes at this. He gets the emails
7 all the time of all the kids whose lives have been
8 ruined. So he sees it firsthand. So when he speaks on
9 this, he's speaking from many students reaching out
10 and --

11 JOHN ANTHONY: Yeah.

12 SPENCER CORNELIA: -- speaking negatively of
13 this. And for guys like us, we -- we take it to heart
14 because we hate hearing these stories.

15 JOHN ANTHONY: Yep. Yeah. And -- and so
16 these -- these are guys with their lives ab- --
17 absolutely ruined. These are guys that are
18 impressionably young men that are, like, depressed, that
19 are down and out. They have nowhere to turn. Okay?
20 And they f-ing exploit them and make them f-ing take out
21 loans and lines of credit so that they can get the money
22 for their programs. And they know these guys can't
23 repay it.

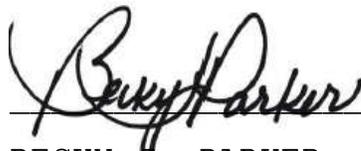
24 Literally there's multiple stories of guys
25 with their lives totally ruined. Okay? And that is why

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C E R T I F I C A T E

I, BECKY J. PARKER, do hereby certify that the foregoing pages constitute a full, true, and accurate transcript of the digital recording, all transcribed to the best of my skill and ability.

WITNESS my hand this 4th day of February, 2022.



BECKY J. PARKER, RPR, CCR

Nevada Certified Court Reporter No. 934

EXHIBIT 2

Excer ts of Transcri tion of YouTube Video Derek Moneyberg Fake Guru

EXHIBIT 2

1

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10 TRANSCRIPTION OF YOUTUBE VIDEO

11 DEREK MONEYBERG - FAKE GURU?

12 Friday, February 19, 2021

13

14

15

16

17

18

19 Proceedings recorded by electronic sound recording;

20 Transcript produced by transcription service.

21

22

23

24

25 Transcribed by: BECKY J. PARKER, RPR, CCR
Nevada Certified Court Reporter No. 934

1 FRIDAY, FEBRUARY 19, 2021

2 -oOo-

3

4 (Introductory statement.)

5 SPENCER CORNELIA: If you missed Part 1, link
6 is in the description for you to watch later.

7 John Anthony Lifestyle joined me to share all of the
8 shady business practices of Derek Moneyberg, which
9 continues into this video. If you enjoy expose-type
10 videos in the dating niche, then check out his channel
11 in the description. Enjoy.

12 (YouTube video begins.)

13 JOHN ANTHONY: Yeah. I -- I actually got
14 arrested. My only time I've ever been arrested in my
15 life, it was hanging out with this motherfucker one on
16 one. Okay? He's like one of the worst human beings
17 I've ever met.

18 I didn't know at the time, but he was using
19 aliases. Okay? His real name is Dale Buczkowski. He
20 goes by the alias -- he was going by the alias RSD Derek
21 and had his face hidden and everything. And we can show
22 you -- I'll send you a picture from when he -- he came
23 to visit me in Vegas.

24 Basically I get a text that said, Hey, I'm
25 coming to Vegas. Don't -- don't let anyone know I'm in

1 town. I'll explain later. Okay? Never explained.
2 Without going into all the details of -- of what
3 happened, you know, it's -- it's very obvious that he
4 was involved there. Yeah.

5 But basically I found out this guy was using
6 aliases, burner phones. I did some research on him,
7 had -- had some people help me do some research on him
8 and he has, like, a lengthy arrest record where he was
9 involved with, you know, property forfeiture for -- for
10 manufacturing illegal drugs, for battery. All kinds of
11 stuff.

12 SPENCER CORNELIA: It's public record too.
13 Like it's -- it's known. It's public.

14 JOHN ANTHONY: Yeah. Yeah, and -- yeah, and
15 he's tried to hide all of it. And basically what --
16 what this guy has done is he's -- he's, like, no
17 different than any of the -- the fake gurus that -- that
18 you roast all the time on -- on your channel, is he's
19 regurgitating stuff from, like, Sam Lovens or -- or
20 Dan Pena or, like, you know, just some classical
21 business guys or stuff you could read in Forbes
22 Magazine. And he just gives, like, a -- some very basic
23 regurgitated stuff, and then it's just very
24 high-pressure sales tactics to buy his courses, his
25 high-ticket courses. So he even has, like, a \$75,000

1 coaches who know how to do it, but then if you're a fake
2 guru, you can use the same messaging and it's -- it
3 can --

4 JOHN ANTHONY: Yeah.

5 SPENCER CORNELIA: -- just still sucker
6 people in.

7 JOHN ANTHONY: Yeah. Yeah. It always
8 bothered me because I -- I was the guy that, like, I --
9 I didn't -- I didn't come into this at all from the
10 internet marketing side. I came into this from, like,
11 learning the real skill and, like, putting in the blood,
12 sweat, and tears and, like, just relentlessly optimizing
13 a system over 15 years, which is why I take even more
14 offense to the fact that there's all these clowns making
15 a mockery of it, you know, teaching trash systems and
16 just ripping people off. And I always deal with the
17 fallout because I'm the guy in the industry that
18 actually fixes the problem. So I've been talking to
19 guys for many years that, you know, spent lots of time,
20 effort, and money and didn't get anywhere.

21 SPENCER CORNELIA: You -- at -- at the time
22 of your arrest, for a guy that's been in this dating
23 world for so long, you've had basically one night that
24 ended in an arrest, and it happened to be with Derek, or
25 Dale is his real name.

1 JOHN ANTHONY: Yep.

2 SPENCER CORNELIA: And --

3 JOHN ANTHONY: And we -- and we were one on
4 one as well.

5 SPENCER CORNELIA: You were one on one. And
6 there -- I know there was a lot of shady stuff, too,
7 where he disappeared, he changed his number or
8 something, and then it's, like, he's your friend, he's
9 hanging out with you, and you get arrested, and then
10 he's gone.

11 JOHN ANTHONY: He was using a -- a burner
12 phone and he was using an alias at that time. And he
13 claimed to not know the -- the girls that we approached.
14 And then it turns out that one of the main girls in the
15 group was working, like, a block from where he lives in
16 Chicago. And then that girl ended up dead. That girl,
17 a 28-year-old living in Las Vegas was like the primary
18 witness in the case, ended up dead. And then -- and I
19 couldn't find the cause of death. I searched for it.
20 28, doesn't make much sense. I think that was, like,
21 the --

22 SPENCER CORNELIA: Wow. That's really
23 bizarre.

24 JOHN ANTHONY: -- that was the link to him.

25 SPENCER CORNELIA: That's shady.

1 Yes. So the next note on my notes is the --
2 the drug house. So you -- do you believe -- well, I
3 guess with public record, he must have been running a
4 drug operation. If it's a house tied to him, it was a
5 house purchased using drug money. Is there any reason
6 to believe that it was him running a drug operation? Do
7 you think that's how he made his money?

8 JOHN ANTHONY: I don't -- I don't know the
9 details of it. I know -- I know he was -- he has
10 listed, like, that he -- that he had a business called,
11 like, Larson Consulting which -- which has, like, no,
12 you know, substance behind it online, but it looks very
13 well like it could be a --

14 SPENCER CORNELIA: Yeah.

15 JOHN ANTHONY: -- front.

16 SPENCER CORNELIA: The address is right down
17 the street from my house here, too, in Vegas.

18 JOHN ANTHONY: It looks -- it looks very well
19 like it could be a front for laundering money.

20 SPENCER CORNELIA: Yeah. I would love to
21 know the details. And, clearly, he's not going to be
22 one to share it with us. But there -- there is -- you
23 know, sometimes when you look into people, it's, like,
24 okay, there's some smoke here. There -- there's
25 something that we're not seeing and we won't know

1 programs are not delivering what's promised, or at least
2 the expectations of the students.

3 JOHN ANTHONY: Uh-huh. Yep. Yeah, he
4 also -- like, even his credentials. Like, someone said
5 in one of the YouTube comments, they provided proof
6 that, like -- that he never went to -- like, you know,
7 he never attended Chicago business school. He did,
8 like, some kind of online thing. And it -- it's --
9 there's just so much shady stuff. He -- he -- he's
10 always just building up, like, Oh, I have -- I have all
11 this money. I have all this knowledge and all this
12 stuff. And then he's -- he's putting up stuff on
13 Instagram with, like, it looks like a -- a tiny
14 apartment with like a -- a dingy little fridge and stuff
15 like that.

16 SPENCER CORNELIA. Yeah. So let's speak
17 about the bootcamp reviews. Do you still run bootcamps,
18 or at least pre-health event?

19 JOHN ANTHONY: Yep.

20 SPENCER CORNELIA: Were you running in-person
21 bootcamps?

22 JOHN ANTHONY: Yep.

23 SPENCER CORNELIA: Okay. So what -- I've
24 never done a bootcamp, but I'm -- obviously I'm familiar
25 with this -- the industry.

1 a false copyright strike on it within, like, 12 hours.
2 But I had a lawyer review it before I even put it out,
3 and when I fought back, I said they're abusing the
4 copyright system. RSD has put a whole bunch of strikes
5 on my channel abusing the copyright system, you know.
6 And -- and you deal with this stuff, too, when you --
7 when you take on these guys.

8 They -- they delete the comments. They try
9 to suppress things. And I've been -- I've been taking
10 them on for years and -- and they'll go and spread
11 rumors when guys are try- -- debating between my program
12 and the other program. They'll tell people that I'm a
13 rapist, for example. I've never been accused or charged
14 with rape. That situation with Derek did not involve
15 any sex in the case or any kind of rape accusation.

16 So, you know, like, it's very, very
17 frustrating that they -- they'll play, like, as low and
18 dirty as they possibly can, even to the point of setting
19 people up for arrests. Even to the point of using
20 intimidation and bullying and -- and threats and all
21 this stuff. And you have these guys that don't know any
22 better. Right? And they're -- everyone's just getting
23 kind of swept along, you know. And all these reviews
24 just involve the guys emptying their pockets and -- and
25 receiving nothing in return. And it's --

1 JOHN ANTHONY: Yeah.

2 SPENCER CORNELIA: And I find it really
3 unfortunate that these gurus can use vague surface level
4 concepts that sound good to a beginner. Right? If you
5 don't know anything about the stock market, you can make
6 it sound great. But then you funnel people into a
7 \$5,000 course, and it really upsets me.

8 JOHN ANTHONY: Yeah. Yeah. Someone -- I
9 made a note on the stock one. Someone said, I tuned in
10 to his courses where -- where he's selling the stocks
11 and shares program. It's concepts that I've seen
12 elsewhere, such as the Intelligent Investor Stock Market
13 Cash Flow by Andy Tanner. He just repackaged content and
14 then made it out -- he made himself out to be some kind
15 of genius because he studied business, but he doesn't
16 even have a real -- he never actually went to University
17 of Chicago. A lot of high-pressured tactics, getting
18 people to do things in order to get compliance.

19 I remember what my -- my thought was that I
20 had forgot before. It kind of ties in here. So I came
21 from this, like, purely from, like, you know, mastering
22 the game and optimizing and all this stuff. And then
23 when I started seeing, like, internet marketers and some
24 of their presentations and stuff like that, or just like
25 the scammers and the fake gurus, they're making

1 Another guy spent upwards of 20,000 for all
2 his expenses. Took -- took three programs with Derek.
3 Derek was a father figure afterwards. He realized he
4 got f-ed in the ass big time. I don't know if we're
5 allowed to talk like that on your channel, but I just
6 did.

7 This is a different guy. This is separate
8 guy, 27-year-old that -- having a mental breakdown after
9 the third program. Told -- told lots of shady stories
10 about Derek being a heavy racist and sociopath.

11 SPENCER CORNELIA: False prophets, man.

12 JOHN ANTHONY: Yeah. So, I mean, like, to
13 sum up, it's -- it's basically, like, all the -- all the
14 videos are just to build the -- to build the fake image
15 and get you to sign up for their courses. And he -- he
16 pads this stuff acting rich. Okay? Obviously, it's not
17 true. He's in, like, you know, tiny apartments with --
18 with dingy fridges and stuff like that. Say -- he --
19 he's always saying, Oh, I have this Ivy League degree.
20 You know, he didn't even attend a Chicago business
21 school. Some online thing.

22 He's trying to, like, hide all his, like,
23 criminal past. There's, like, tons of -- of shady
24 stuff. Why -- why is he running around with aliases and
25 burner phones and all this stuff. And -- and he's

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C E R T I F I C A T E

I, BECKY J. PARKER, do hereby certify that the foregoing pages constitute a full, true, and accurate transcript of the digital recording, all transcribed to the best of my skill and ability.

WITNESS my hand this 4th day of February, 2022.



BECKY J. PARKER, RPR, CCR

Nevada Certified Court Reporter No. 934

EXHIBIT

Declaration of Dale Buczowski

EXHIBIT

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888 Main Street, #543
9 New York, NY 10044
Telephone: 917.853.0057

10 *Attorneys for Plaintiffs Wealthy Inc. and*
11 *Dale Buczkowski*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 WEALTHY INC. and DALE
15 BUCZKOWSKI,

16 Plaintiffs,

17 v.

18 SPENCER CORNELIA, CORNELIA
19 MEDIA LLC, and CORNELIA
EDUCATION LLC,

20 Defendants.

Case No.: 2:21-cv-01173-JCM-EJY

**DECLARATION OF DALE
BUCZKOWSKI**

21
22 I, Dale Buczkowski, hereby state that I have personal knowledge of the facts as set forth
23 below. If called as a witness, I could and would testify as follows:

- 24 1. I am a citizen of the United States and am over eighteen (18) years of age.
25 2. I am a plaintiff in this action, and I make this declaration in connection with the Plaintiffs
26 Motion for Partial Summary Judgment. (the "Motion").
27
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Background

- 3. I graduated from the University of Chicago Booth School of Business with a Master of Business Administration (MBA) degree in 2015. A true and correct image of my diploma is annexed as Exhibit A.
- 4. I am the President and Co-Founder of Larson Consulting, founded in 2011, which is dedicated to helping leaders solve critical strategic issues, accelerate growth, and improve the reputation and brand of their organizations in the context of strongly held values.

Wealthy, Inc.’s Business

- 5. Wealthy Inc. (“Wealthy”) was founded in 2019 and is a leading entrepreneurship, finance, business, real-estate and self-improvement company owned and operated by myself, under the federally registered trademark, Derek Moneyberg®.
- 6. Wealthy offers three entry level programs entitled Moneyberg® Mentoring, Markets Mastery, and Real Estate Riches. These programs focus on entrepreneurship, financial markets, and real-estate investing. These programs are currently offered at \$5,000 each.
- 7. Wealthy also offers its clients a program entitled Mastermind Network, which currently requires a \$20,000 initiation fee and a \$5,000 annual renewal fee. This program provides a monthly coaching call and a forum for top students to network and exchange ideas in a high value environment.
- 8. Wealthy also offers 1-ON-1 Training with Derek Moneyberg®.
- 9. Wealthy actively markets its courses on various social media channels, including YouTube, LLC (Derek Moneyberg), Instagram (@derekmoneyberg), Facebook (@derekmoneyberg), Twitter (@derekmoneyberg), LinkedIn (Derek Moneyberg), Spotify (The Derek Moneyberg Podcast), and Apple Podcast (The Derek Moneyberg Podcast).
- 10. At the time the Complaint was filed in this case, Wealthy's YouTube channel, Derek Moneyberg, had approximately 23.7K subscribers and over 1.2 million views, according to YouTube.

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1 11. Currently, Wealthy's YouTube channel, Derek Moneyberg, has approximately 138K
2 subscribers and over 4.9 million views.

3 12. Wealthy's YouTube channel, Derek Moneyberg, targets an audience interested in self-
4 improvement in the areas of entrepreneurship, finance, business, and real-estate.

5 13. I am and have been focused on growing my entrepreneurship, finance, business, and real-
6 estate focused clientele through Wealthy and the Derek Moneyberg® brand.

7 **DEFENDANTS' FALSE AND DEFAMATORY VIDEOS**

8 14. Between December 2020 and February 2021, Defendants, in collaboration with Mr.
9 Mulvehill, produced at least two videos on YouTube containing false and defamatory
10 statements about Mr. Buczkowski and the Derek Moneyberg® brand.

11 **False Statements That I Lied About My Educational Achievement**

12 15. The First and Second Videos include assertions that I lied about my educational
13 achievement.

14 16. The assertion that I lied about my level of educational achievement is false.

15 17. As noted above, I received an MBA from the University of Chicago Booth School of
16 Business in 2015. *See* Exhibit A.

17 **False Statements That I Laundered Money**

18 18. The Second Video includes assertions that I laundered money through my business Larson
19 Consulting.

20 19. The assertion that I or any of my businesses, including Larson Consulting, engaged in
21 money laundering is false.

22 **False Statements That I Manufactured/Sold Drugs**

23 20. The Second Video includes assertions that I manufactured and/or sold illegal drugs.

24 21. The assertion that I engaged in illicit drug manufacture and/or sale is false.

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22. The assertion that I engaged in illicit drug manufacture and/or sale appears to be based entirely on speculation by Defendants and Mr. Mulvehill about a prior litigation involving asset forfeiture of property owned by my deceased grandmother, in which I temporarily served as the executor of the estate. The litigation in question was resolved without any finding of wrongdoing following a decision by the Court of Appeals for the Eighth Circuit which reversed a decision of the District Court striking claims by the estate as untimely, *U.S. v. Real Properties Located at 7215 Longboat*, 750 F.3d 968 (8th Cir. 2014).

23. I never manufactured drugs, nor have I ever been arrested for a drug crime, much less charged with, or convicted of a drug crime.

False Statements That I Framed Mr. Mulvehill for His Arrest

24. The First and Second Videos include assertions that I framed Mr. Mulvehill for his 2013 arrest in Las Vegas, leading to four felony and four misdemeanor charges.

25. The assertion that I framed Mr. Mulvehill for Mr. Mulvehill's 2013 arrest involving four felony and four misdemeanor charges is false.

False Statements That I Was Involved in the Death of Mulvehill's Alleged Victim

26. The Second Video includes assertions that I was involved in the death of the woman who was the alleged victim in the arrest of Mr. Mulvehill.

27. The assertion that I was involved in the death of the woman who was the alleged victim in the arrest of Mr. Mulvehill for four felony and four misdemeanor charges is false.

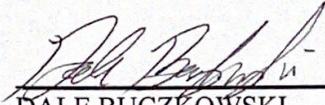
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28. I did not know the woman before Mr. Mulvehill allegedly attacked her, and I did not have any contact with her after Mr. Mulvehill allegedly victimized her.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed in Los Angeles California on this 30th day of September 2022.



DALE BUCZKOWSKI

EXHIBIT A

EXHIBIT A



THE UNIVERSITY OF CHICAGO

ON THE RECOMMENDATION OF THE FACULTY
AND BY VIRTUE OF THE AUTHORITY VESTED IN THEM
THE TRUSTEES OF THE UNIVERSITY HAVE CONFERRED ON

DALE MICHAEL BUCZKOWSKI

THE DEGREE OF

MASTER OF BUSINESS ADMINISTRATION

THE UNIVERSITY OF CHICAGO BOOTH SCHOOL OF BUSINESS

AND HAVE GRANTED THIS DIPLOMA AS EVIDENCE THEREOF
GIVEN IN THE CITY OF CHICAGO IN THE STATE OF ILLINOIS

IN THE UNITED STATES OF AMERICA IN THE YEAR

TWO THOUSAND AND FIFTEEN

ON THE THIRTEENTH DAY OF JUNE

Joseph H. ...
Chairman of the Board of Trustees

...
University Registrar



Robert J. ...
President of the University

Erin D. ...
Provost

Sumit ...
Dean

The University of Chicago

EXHIBIT

Defendant Sencer Cornelia's Responses to Plaintiffs' First Set of Interrogatories to Defendants Pursuant to FRCP

EXHIBIT

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and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT SPENCER CORNELIA'S
RESPONSES TO PLAINTIFFS' FIRST
SET OF INTERROGATORIES TO
DEFENDANTS PURSUANT TO FRCP 33**

Pursuant to Fed. R. Civ. P. 26 and 33, Defendant Spencer Cornelia hereby respond to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") First Set of Interrogatories Pursuant to FRCP 33.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

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Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be implied or inferred. The fact that any request herein has been responded upon should not be taken as an admission, or a concession, of the existence of any facts set forth or assumed by such request, or that such response constitutes evidence of any fact thus set forth or assumed. All responses must be construed as given on the basis of present recollection.

GENERAL OBJECTIONS

1. Defendant objects to the subject interrogatories to the extent that they request the disclosure of information protected by the attorney-client privilege, the work-product doctrine, or any other recognized privilege or immunity.

2. Defendant objects to the subject interrogatories to the extent that they do not seek relevant information or are not proportional to the needs of the case. The providing of answers in response to any request is not to be deemed or construed as an admission by Defendant that the information is in fact relevant to this action.

3. Defendant objects to the subject interrogatories to the extent that they call for information not in the possession, custody, or control of Defendant.

4. To the extent words or phrases used in the requests are vague, ambiguous, or otherwise overbroad, Defendant shall respond in a manner in which he believes, in good faith, to be requested thereby.

5. Defendant states that discovery in this matter is continuing and ongoing and that it is possible that additional information responsive to the interrogatories will be identified subsequent to the date of this response.

6. All responses made herein are based upon the best knowledge, information, and belief held by Defendant at the time of the response.

7. Defendant objects to the Definitions to the extent they conflict with the definitions applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

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1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Interrogatory as follows:

7 **RESPONSES TO INTERROGATORIES**

8 **INTERROGATORY NO. 1:**

9 Identify the entity in the name of which the Spencer Cornelia YouTube channel is
10 registered, including all contact information for such entity provided to or held by Google LLC,
11 regarding the Spencer Cornelia YouTube channel.

12 **RESPONSE TO INTERROGATORY NO. 1:**

13 The channel is in the name of Spencer Cornelia. The email address associated with the
14 channel is <spencer0cornelia@gmail.com>.

15 **INTERROGATORY NO. 2:**

16 Identify all financial accounts (including but not limited to any and all bank accounts,
17 money market accounts, and brokerage accounts) now or previously receiving income from the
18 Spencer Cornelia YouTube channel.

19 **RESPONSE TO INTERROGATORY NO. 2:**

20 Objection: This request is overbroad and is not proportional to the needs of the case. This
21 request seeks all financial accounts that have received money from the Spencer Cornelia YouTube
22 channel, not just financial accounts which Defendant owns or of which he is a beneficiary. To the
23 extent this Interrogatory is limited to financial accounts evidencing income Defendant has received
24 from the Spencer Cornelia YouTube channel, it does not seek information relevant to any party's
25 claims or defenses.

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1 Notwithstanding the foregoing objections, Defendant responds as follows: Defendant owns
2 a Wells Fargo account that receives funds from the Spencer Cornelia YouTube Channel. {{I
3 recommend we not answer, and rest on objections }}

4 **INTERROGATORY NO. 3:**

5 Identify all financial accounts (including but not limited to any and all bank accounts,
6 money market accounts, and brokerage accounts) now or previously owned by CORNELIA
7 MEDIA LLC, and CORNELIA EDUCATION LLC that have received income from the Spencer
8 Cornelia YouTube channel.

9 **RESPONSE TO INTERROGATORY NO. 3:**

10 Objection: This Interrogatory is overbroad and is not proportional to the needs of the case.
11 This Interrogatory does not seek relevant information, as the subject financial accounts have no
12 bearing on Plaintiffs' claims.

13 Notwithstanding the foregoing objections, Defendant responds as follows: There are no
14 such accounts.

15 **INTERROGATORY NO. 4:**

16 Identify all social media and email accounts (including but not limited to Facebook,
17 YouTube, Twitter, Instagram, Reddit) you own (or owned) or control (or controlled) through
18 which you ever have communicated on the topic of any of the Plaintiffs or Derek Moneyberg.

19 **RESPONSE TO INTERROGATORY NO. 4:**

20 Objection: This Interrogatory is overbroad and unduly burdensome and is not proportional
21 to the needs of the case. It is not limited in scope to any of the statements at issue or any other
22 issue relevant to the parties' claims or defenses. It is also not limited to any relevant time period.

23 Notwithstanding the foregoing objections, Defendant responds as follows: Defendant has
24 spoken about Plaintiffs on his YouTube account and has communicated on the topics of Plaintiffs
25 or Derek Moneyberg using the email accounts <spencer0cornelia@gmail.com> and
26 <spencercornelialawsuit@gmail.com>.

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1 **INTERROGATORY NO. 5:**

2 Identify all persons or entities to whom or to which you ever have communicated on the
3 topic of any of the Plaintiffs or Derek Moneyberg.

4 **RESPONSE TO INTERROGATORY NO. 5:**

5 Objection: This Interrogatory is overbroad, unduly burdensome, and is not proportional to
6 the needs of the case. It is not limited in scope to any of the statements at issue or any other issue
7 relevant to the parties’ claims or defenses. It is also not limited to any relevant time period.

8 Notwithstanding the foregoing objections, Defendant responds as follows: John Anthony
9 Lifestyle, The Drip podcast, The Iced Coffee Hour Podcast, John Mulvehill, Graham Stephan, Jack
10 Selby, Stephen Findeisen, and Amish Patel.

11 **INTERROGATORY NO. 6:**

12 Identify and describe all facts that support Your contention that the statements complained
13 of in the Complaint are true or substantially true.

14 **RESPONSE TO INTERROGATORY NO. 6:**

15 As to all statements at issue, the representations of Mr. Mulvehill in the First and Second
16 Videos, produced as Bates Nos. COR000001 and COR000002. Responsive information is also
17 contained within documents previously produced as Bates Nos. COR000078-COR000084.

18 As to the statements regarding Larson Consulting, this entity only has one officer, Dale
19 Buczkowski. It has 1 share and a total authorized capital of \$100. There is no signage outside the
20 address listed on the Nevada Secretary of State’s website for the company, and there is only a “no
21 soliciting” sign on its door. The company has a Facebook page, but it does not appear to have
22 posted any content since November 15, 2013. It has 36 followers. It lists a website,
23 <larsonconsultinginc.com>, but the site is under construction and does not display any content.
24 The current registrant did not acquire the domain until June 22, 2020. However, <archive.org>’s
25 Wayback Machine shows that it was displaying content for Plaintiffs’ Larson Consulting business
26 from April 2013 to January 2019. During this time, the site prominently displayed the name “Dale
27

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1 Buczkowski.” There was very little content on the site at this time, as it merely displayed some
2 mundane paragraphs about desirable characteristics such as “integrity” and “optimism,” and
3 contact information for the company. Based on these facts it appears that, at least as of the time
4 the videos at issue were published, Larson Consulting does not provide any legitimate goods or
5 services.

6 As for the statements regarding Buczkowski’s involvement in a drug operation,
7 Buczkowski made claims for property that was subject to civil asset forfeiture claims in *United*
8 *States v. 7212 Longboat Drive*, Case No. 4:12-cv-00484 (S.D. Iowa) and *United States v. 7215*
9 *Longboat Drive*, Case No. 4:12-cv-00487 (S.D. Iowa) (later consolidated). These documents have
10 previously been produced as Bates Nos. COR000087-COR000115. In these cases, The U.S. filed
11 civil forfeiture actions against 5 Iowa properties based on allegation they were purchased with, or
12 used to facilitate, drug crimes. The civil asset forfeiture complaint asserted that Daryl Buczkowski,
13 Buczkowski’s father and son-in-law of Mariani, “has a criminal history that includes a conviction
14 . . . for manufacturing and delivery of cocaine for which he was sentenced to a term of
15 imprisonment for 15 years.” (Complaint at ¶ 11.) It alleged that Daryl was the registered agent of
16 a company whose white vehicle was used to attempt to retrieve equipment from a storage unit that
17 was later searched and found to contain equipment for an indoor marijuana grow operation. (*Id.* at
18 ¶¶ 12-14.) It further alleged that a neighboring property, owned by a friend of Buczkowski,
19 Timothy Lantz, contained mail addressed to Buczkowski, credit cards in Plaintiff’s name,
20 Buczkowski’s tax returns, and that the neighboring property was being used to operate a marijuana
21 grow operation. (*Id.* at ¶¶ 15-20.) Lantz was also indicted for his involvement in this scheme.
22 Considering these facts, Defendant thinks it highly likely that Buczkowski was involved in a
23 marijuana grow operation. The fact that these civil asset forfeiture claims were later settled without
24 any finding of criminal wrongdoing does not constitute a finding that Buczkowski was uninvolved
25 in this activity.

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Regarding Buczkowski engaging in illegal activity in helping his clients obtain credit, not authoring his own content, and coercing his clients to provide testimonials, documents with information regarding the truth of such statements can be found at documents previously produced as Bates Nos. COR000011-COR000084, as well as COR000151.

INTERROGATORY NO. 7:

Identify and describe all facts that support Your contention that Defendants knew or had a significant subjective belief that the statements claimed to be actionable in the complaint were true or substantially true at the time they were made.

RESPONSE TO INTERROGATORY NO. 7:

As to all statements at issue, the representations of Mr. Mulvehill in the First and Second Videos, produced as Bates Nos. COR000001 and COR000002. Defendant found Mr. Mulvehill to be a credible source of information regarding Plaintiffs.

As to the statements regarding Larson Consulting, this entity only has one officer, Dale Buczkowski. It has 1 share and a total authorized capital of \$100. There is no signage outside the address listed on the Nevada Secretary of State’s website for the company, and there is only a “no soliciting” sign on its door. The company has a Facebook page, but it does not appear to have posted any content since November 15, 2013. It has 36 followers. It lists a website, <larsonconsultinginc.com>, but the site is under construction and does not display any content. The current registrant did not acquire the domain until June 22, 2020. However, <archive.org>’s Wayback Machine shows that it was displaying content for Plaintiffs’ Larson Consulting business from April 2013 to January 2019. During this time, the site prominently displayed the name “Dale Buczkowski.” There was very little content on the site at this time, as it merely displayed some mundane paragraphs about desirable characteristics such as “integrity” and “optimism,” and contact information for the company. Based on these facts it appears that, at least as of the time the videos at issue were published, Larson Consulting did not provide any legitimate goods or services. A company that did not appear to do anything legitimate being owned and operated

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1 apparently only by Buczkowski was a strong indicator that Larson Consulting was not a legitimate
2 business and could have existed for the purpose of laundering money.

3 As for the statements regarding Buczkowski’s involvement in a drug operation,
4 Buczkowski made claims for property that was subject to civil asset forfeiture claims in *United*
5 *States v. 7212 Longboat Drive*, Case No. 4:12-cv-00484 (S.D. Iowa) and *United States v. 7215*
6 *Longboat Drive*, Case No. 4:12-cv-00487 (S.D. Iowa) (later consolidated). These documents have
7 previously been produced as Bates Nos. COR000087-COR000115. In these cases, The U.S. filed
8 civil forfeiture actions against 5 Iowa properties based on allegation they were purchased with, or
9 used to facilitate, drug crimes. The civil asset forfeiture complaint asserted that Daryl Buczkowski,
10 Buczkowski’s father and son-in-law of Mariani, “has a criminal history that includes a conviction
11 . . . for manufacturing and delivery of cocaine for which he was sentenced to a term of
12 imprisonment for 15 years.” (Complaint at ¶ 11.) It alleged that Daryl was the registered agent of
13 a company whose white vehicle was used to attempt to retrieve equipment from a storage unit that
14 was later searched and found to contain equipment for an indoor marijuana grow operation. (*Id.* at
15 ¶¶ 12-14.) It further alleged that a neighboring property, owned by a friend of Buczkowski,
16 Timothy Lantz, contained mail addressed to Buczkowski, credit cards in Plaintiff’s name,
17 Buczkowski’s tax returns, and that the neighboring property was being used to operate a marijuana
18 grow operation. (*Id.* at ¶¶ 15-20.) Lantz was also indicted for his involvement in this scheme.
19 Defendant found nothing implausible or not credible about the facts alleged in these documents.
20 Considering these facts, Defendant thinks it highly likely that Buczkowski was involved in a
21 marijuana grow operation. The fact that these civil asset forfeiture claims were later settled without
22 any finding of criminal wrongdoing does not constitute a finding that Buczkowski was uninvolved
23 in this activity.

24 Regarding Buczkowski engaging in illegal activity in helping his clients obtain credit, not
25 authoring his own content, and coercing his clients to provide testimonials, documents with
26 information regarding the truth of such statements can be found at documents previously produced
27

1 as Bates Nos. COR000011-COR000043. Defendant found that Mr. Mulvehill was a credible
2 source of information regarding Plaintiffs, as he credibly claimed to be personally familiar with
3 Buczkowski and he showed Defendant correspondence with individuals who appeared to be
4 former clients or employees of Plaintiffs. Defendant had no reason to doubt the authenticity of this
5 correspondence or the claims made in them. Furthermore, Defendant viewed a video interview
6 with Mr. Mulvehill and a man named Rohit (produced as Bates Nos. COR000151), who claimed
7 to be a former contractor for Plaintiffs, where Rohit made several claims about how deceptive and
8 fraudulent Plaintiffs' business practices are. Defendant found Rohit to be highly credible and had
9 no reason to doubt his claims regarding Plaintiffs.

10 **INTERROGATORY NO. 8:**

11 Identify all efforts made to investigate whether the statements claimed to be actionable in
12 the complaint are true or substantially.

13 **RESPONSE TO INTERROGATORY NO. 8:**

14 Defendant, through his own investigation or by being provided this information from third
15 parties including Mr. Mulvehill, possessed all the information referred to in his response to
16 Interrogatory No. 7 prior to publishing the videos at issue. Additionally, prior to publication,
17 Defendant reviewed a video Mr. Mulvehill published on his YouTube channel, John Anthony
18 Lifestyle, on May 10, 2020, which repeats many of the claims made in the First and Second
19 Videos regarding Plaintiffs. This May 10, 2020 video, however, has since been removed.

20 **INTERROGATORY NO. 9:**

21 Identify all statements claimed to be actionable in the complaint that you now believe are
22 false.

23 **RESPONSE TO INTERROGATORY NO. 9:**

24 The only statements alleged in the Complaint Defendant now believes to be false are those
25 concerning the legitimacy of Buczkowski's education credentials. Defendant did not believe such
26 statements to be false at the time the videos at issue were published.

1 **INTERROGATORY NO. 10:**

2 Identify and describe the substance of all discussions you have had with Mr. Mulvehill
3 about this lawsuit, including but not limited to any efforts to raise money or find evidence
4 supporting your defenses in this lawsuit.

5 **RESPONSE TO INTERROGATORY NO. 10:**

6 Objection: This Interrogatory is overbroad, unduly burdensome, and is not proportional
7 to the needs of the case, as discussions regarding fundraising efforts have no bearing on any
8 party's claims or defenses.

9 Notwithstanding the foregoing objections, Defendant responds as follows: Defendant has
10 not had any discussions with Mr. Mulvehill regarding fundraising efforts. Discussions regarding
11 finding evidence supporting Defendant's defenses in this lawsuit are found in documents with
12 Bates Nos. COR000007-COR000043 and COR000078-COR000084.

13 **INTERROGATORY NO. 11:**

14 Identify and describe the substance of all discussions you have had about any of the
15 plaintiffs, Derek Moneyberg, or this lawsuit, including but not limited to any efforts to raise
16 money for the defense of or to find evidence supporting your defenses in this lawsuit, with the
17 following individuals: (1) Graham Stephan; (2) Jack Selby; (3) Stephen Findeisen (aka.,
18 Coffeezilla); and (4) Amish Patel.

19 **RESPONSE TO INTERROGATORY NO. 11:**

20 Objection: This Interrogatory is overbroad, unduly burdensome, and is not proportional
21 to the needs of the case. Discussions regarding fundraising efforts have no bearing on any party's
22 claims or defenses. This Interrogatory is not limited in scope to the statements at issue in this case
23 or any other issue relevant to the parties' claims or defenses. This Interrogatory is also not limited
24 to any relevant time period.

25 Notwithstanding the foregoing objections, Defendant responds as follows: The requested
26 information can be found by reviewing documents produced as Bates Nos. COR000004-

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COR000006, WEALTHY000184-WEALTHY000332, and WEALTHY000388-WEALTHY000393.

INTERROGATORY NO. 12:

Identify any information you have about the current location of or ways to communicate with, Mr. Mulvehill a/k/a John Anthony.

RESPONSE TO INTERROGATORY NO. 12:

Objection: This request seeks the address and contact information of a third-party witness who has filed a motion to quash a subpoena seeking similar information. Mr. Mulvehill’s contact information is not relevant to any party’s claims or defenses and the deadline to amend the pleadings and add parties has passed, meaning this Interrogatory is not proportional to the needs of the case.

Notwithstanding the foregoing objections, Defendant responds as follows: Defendant has been informed that Mr. Mulvehill lives in Brazil, but has no further information regarding his whereabouts.

Dated: March 21, 2022.

As to Objections,
/s/ Alex J. Shepard
Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

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Case No. 2:21-cv-01173-JCM-EJY

VERIFICATION OF RESPONSES TO INTERROGATORIES

I, Spencer Cornelia, have reviewed the foregoing responses to Plaintiffs Wealthy Inc. and Dale Buczkowski’s First Set of Interrogatories Pursuant to FRCP 33, and I hereby declare under penalty of perjury that the foregoing responses are true and correct to the best of my knowledge and understanding.

Executed on: 3/21/2022 (date).

DocuSigned by:
Spencer Cornelia
Spencer Cornelia

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Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
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701 S. 7th Street
Las Vegas, NV 89101

Culhane Meadows PLLC
Jeffrey Vockrodt, Esq.
<jvockrodt@cm.law>
David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Suzanne Levenson
Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant S enker Cornelia s Res onses to Plaintiff s First Set of Re uests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

Marc J. Randazza, NV Bar No. 12265
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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT SPENCER CORNELIA'S
RESPONSES TO PLAINTIFFS' FIRST
SET OF REQUESTS FOR ADMISSION
PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Spencer Cornelia hereby respond to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") First Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject interrogatories to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which he believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that document WEALTHY000058-WEALTHY000089 is a true and authentic
10 transcript of the First Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 2:**

14 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
15 First video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

17 Denied.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that document WEALTHY000448-WEALTHY000461 is a true and authentic
20 transcript of the First Video.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Denied.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that document WEALTHY000184-WEALTHY000201 is a true and authentic
25 transcript of the Video entitled “Spencer Cornelia SUED by a Pick Up Artist?” appearing on the
26 YouTube channel “The Drip” and produced by Plaintiffs as document WEALTHY000202.

RANDAZZA | LEGAL GROUP

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 Admitted.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that document WEALTHY000212-WEALTHY000255 is a true and authentic
5 transcript of the Video entitled “Getting Sued By a Fake Guru | Spencer Cornelia” and produced
6 by Plaintiffs as document WEALTHY000256.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 6:**

10 Admit that You posted the following comment in the comment section of the YouTube
11 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
12 LMAOOO | RSD Derek” shown in document WEALTHY000389:

13 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
14 immediate termination. In the email, Instagram made it clear that Derek is at least
15 50 pounds away from appeal court.”

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

17 Admitted.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that You deleted the following comment from the comment section of the YouTube
20 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
21 LMAOOO | RSD Derek” shown in document WEALTHY000389:

22 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
23 immediate termination. In the email, Instagram made it clear that Derek is at least
24 50 pounds away from appeal court.”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

26 Admitted.

27 **REQUEST FOR ADMISSION NO. 8:**

1 Admit that You posted the following comment in the comment section of a YouTube
2 video after the present lawsuit was filed:

3 “filed in Vegas, lawyer said it might be tricky as something about the judge isn’t
4 favorable to anti-slapp. i’m hoping for quick dismissal for sure since this is certainly
5 a bullying case. I didn’t even make the claims, my guest did (in the videos related
6 to the case).”

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 9:**

10 Admit that You made the following statement on YouTube video after the present lawsuit
11 was filed:

12 “While on the phone with my lawyer, we were discussing my case and the strategy
13 will use to prove I’m not guilty of all the claims. I’m obviously going to keep this
14 very brief and summarize the call, but I essentially asked him when he’s like to hear
15 the mountains of proof I accumulated over the last two weeks, proving that the
16 lawsuit has as many flaws as the client of a super greedy plastic surgeon, Hey,
17 lawyer, I have screenshots, emails, documents, You tell me what you need. Then I
18 learned that lawsuits are more of a cat and mouse game, as opposed to- “Here’s the
19 evidence, I’m not guilty, can you leave me along now, Plaintiff?” Now that I
20 understand law 100 times better than I did previously, I’m going to share with you
21 why fake gurus on social media are able to basically get away with whatever they
22 want right now.”

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

24 Admitted.

25 **REQUEST FOR ADMISSION NO. 10:**

26 Admit that John Mulvehill (a.k.a. John Anthony) currently resides outside the United
27 States.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Admitted that Mr. Mulvehill has represented to Defendant that he lives outside the United
States.

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1 **REQUEST FOR ADMISSION NO. 11:**

2 Admit that you have collaborated with John Mulvehill (a.k.a. John Anthony) since this
3 lawsuit began.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

5 Objection: The term “collaborated with” is vague and ambiguous such that it is impossible
6 to respond to this request. This request is overbroad, unduly burdensome, and is not proportional
7 to the needs of the case. It is not limited in scope to any of the statements at issue or any other
8 issues relevant to the parties’ claims or defenses. Post-suit conduct does not have any relevance
9 to the parties’ claims or defenses, the Complaint contains no reference to such conduct, and the
10 deadline to amend the pleadings has passed.

11 Notwithstanding the foregoing objections, Defendant responds as follows: Admitted that
12 Defendant and Mr. Mulvehill have appeared in videos together since this lawsuit began.

13 Dated: March 21, 2022.

14 Respectfully Submitted,

15 /s/ Alex J. Shepard

16 Marc J. Randazza, NV Bar No. 12265

17 Alex J. Shepard, NV Bar No. 13582

18 RANDAZZA LEGAL GROUP, PLLC

19 2764 Lake Sahara Drive, Suite 109

20 Las Vegas, NV 89117

21 Attorneys for Defendants

22 Spencer Cornelia, Cornelia Media LLC,

23 and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
<nbaker@petersonbaker.com>
701 S. 7th Street
Las Vegas, NV 89101

Culhane Meadows PLLC
Jeffrey Vockrodt, Esq.
<jvockrodt@cm.law>
David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Suzanne Levenson
Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant Cornelia Media LLC's Responses to Plaintiffs' First Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA MEDIA
LLC'S RESPONSES TO PLAINTIFFS'
FIRST SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Media LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") First Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject interrogatories to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which it believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that document WEALTHY000058-WEALTHY000089 is a true and authentic
10 transcript of the First Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 2:**

14 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
15 First video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

17 Denied.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that document WEALTHY000448-WEALTHY000461 is a true and authentic
20 transcript of the First Video.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Denied.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that document WEALTHY000184-WEALTHY000201 is a true and authentic
25 transcript of the Video entitled “Spencer Cornelia SUED by a Pick Up Artist?” appearing on the
26 YouTube channel “The Drip” and produced by Plaintiffs as document WEALTHY000202.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 Admitted.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that document WEALTHY000212-WEALTHY000255 is a true and authentic
5 transcript of the Video entitled “Getting Sued By a Fake Guru | Spencer Cornelia” and produced
6 by Plaintiffs as document WEALTHY000256.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 6:**

10 Admit that You posted the following comment in the comment section of the YouTube
11 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
12 LMAOOO | RSD Derek” shown in document WEALTHY000389:

13 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
14 immediate termination. In the email, Instagram made it clear that Derek is at least
15 50 pounds away from appeal court.”

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

17 Admitted.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that You deleted the following comment from the comment section of the YouTube
20 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
21 LMAOOO | RSD Derek” shown in document WEALTHY000389:

22 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
23 immediate termination. In the email, Instagram made it clear that Derek is at least
24 50 pounds away from appeal court.”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

26 Admitted.

RANDAZZA | LEGAL GROUP

REQUEST FOR ADMISSION NO. 8:

Admit that You posted the following comment in the comment section of a YouTube video after the present lawsuit was filed:

“filed in Vegas, lawyer said it might be tricky as something about the judge isn’t favorable to anti-slapp. i’m hoping for quick dismissal for sure since this is certainly a bullying case. I didn’t even make the claims, my guest did (in the videos related to the case).”

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Admitted.

REQUEST FOR ADMISSION NO. 9:

Admit that You made the following statement on YouTube video after the present lawsuit was filed:

“While on the phone with my lawyer, we were discussing my case and the strategy will use to prove I’m not guilty of all the claims. I’m obviously going to keep this very brief and summarize the call, but I essentially asked him when he’s like to hear the mountains of proof I accumulated over the last two weeks, proving that the lawsuit has as many flaws as the client of a super greedy plastic surgeon, Hey, lawyer, I have screenshots, emails, documents, You tell me what you need. Then I learned that lawsuits are more of a cat and mouse game, as opposed to- “Here’s the evidence, I’m not guilty, can you leave me along now, Plaintiff?” Now that I understand law 100 times better than I did previously, I’m going to share with you why fake gurus on social media are able to basically get away with whatever they want right now.”

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Admitted.

REQUEST FOR ADMISSION NO. 10:

Admit that John Mulvehill (a.k.a. John Anthony) currently resides outside the United States.

///

///

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Admitted that Mr. Mulvehill has represented to Defendant that he lives outside the United States.

REQUEST FOR ADMISSION NO. 11:

Admit that you have collaborated with John Mulvehill (a.k.a. John Anthony) since this lawsuit began.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Objection: The term “collaborated with” is vague and ambiguous such that it is impossible to respond to this request. This request is overbroad, unduly burdensome, and is not proportional to the needs of the case. It is not limited in scope to any of the statements at issue or any other issues relevant to the parties’ claims or defenses. Post-suit conduct does not have any relevance to the parties’ claims or defenses, the Complaint contains no reference to such conduct, and the deadline to amend the pleadings has passed.

Notwithstanding the foregoing objections, Defendant responds as follows: Admitted that Defendant and Mr. Mulvehill have appeared in a video together since this lawsuit began.

Dated: March 21, 2022.

Respectfully Submitted,

/s/ Alex J. Shepard

Marc J. Randazza, NV Bar No. 12265

Alex J. Shepard, NV Bar No. 13582

RANDAZZA LEGAL GROUP, PLLC

2764 Lake Sahara Drive, Suite 109

Las Vegas, NV 89117

Attorneys for Defendants

Spencer Cornelia, Cornelia Media LLC,

and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
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701 S. 7th Street
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Jeffrey Vockrodt, Esq.
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<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Suzanne Levenson
Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant Cornelia Education LLC's Responses to Plaintiffs' First Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,
Plaintiff,
v.
SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,
Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA EDUCATION
LLC’S RESPONSES TO PLAINTIFFS’
FIRST SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Education LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski’s (collectively, “Plaintiffs”) First Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

1 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be
2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject interrogatories to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which it believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that document WEALTHY000058-WEALTHY000089 is a true and authentic
10 transcript of the First Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 2:**

14 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
15 First video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

17 Denied.

18 **REQUEST FOR ADMISSION NO. 3:**

19 Admit that document WEALTHY000448-WEALTHY000461 is a true and authentic
20 transcript of the First Video.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

22 Denied.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that document WEALTHY000184-WEALTHY000201 is a true and authentic
25 transcript of the Video entitled “Spencer Cornelia SUED by a Pick Up Artist?” appearing on the
26 YouTube channel “The Drip” and produced by Plaintiffs as document WEALTHY000202.

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

2 Admitted.

3 **REQUEST FOR ADMISSION NO. 5:**

4 Admit that document WEALTHY000212-WEALTHY000255 is a true and authentic
5 transcript of the Video entitled “Getting Sued By a Fake Guru | Spencer Cornelia” and produced
6 by Plaintiffs as document WEALTHY000256.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

8 Admitted.

9 **REQUEST FOR ADMISSION NO. 6:**

10 Admit that You posted the following comment in the comment section of the YouTube
11 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
12 LMAOOO | RSD Derek” shown in document WEALTHY000389:

13 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
14 immediate termination. In the email, Instagram made it clear that Derek is at least
15 50 pounds away from appeal court.”

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

17 Admitted.

18 **REQUEST FOR ADMISSION NO. 7:**

19 Admit that You deleted the following comment from the comment section of the YouTube
20 video entitled “Derek Moneyberg Instagram REMOVED!! Fake Followers PUNISHED
21 LMAOOO | RSD Derek” shown in document WEALTHY000389:

22 “Derek’s man boobs were against Instagram’s Terms of Service leading to an
23 immediate termination. In the email, Instagram made it clear that Derek is at least
24 50 pounds away from appeal court.”

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

26 Admitted.

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REQUEST FOR ADMISSION NO. 8:

Admit that You posted the following comment in the comment section of a YouTube video after the present lawsuit was filed:

“filed in Vegas, lawyer said it might be tricky as something about the judge isn’t favorable to anti-slapp. i’m hoping for quick dismissal for sure since this is certainly a bullying case. I didn’t even make the claims, my guest did (in the videos related to the case).”

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Admitted.

REQUEST FOR ADMISSION NO. 9:

Admit that You made the following statement on YouTube video after the present lawsuit was filed:

“While on the phone with my lawyer, we were discussing my case and the strategy will use to prove I’m not guilty of all the claims. I’m obviously going to keep this very brief and summarize the call, but I essentially asked him when he’s like to hear the mountains of proof I accumulated over the last two weeks, proving that the lawsuit has as many flaws as the client of a super greedy plastic surgeon, Hey, lawyer, I have screenshots, emails, documents, You tell me what you need. Then I learned that lawsuits are more of a cat and mouse game, as opposed to- “Here’s the evidence, I’m not guilty, can you leave me along now, Plaintiff?” Now that I understand law 100 times better than I did previously, I’m going to share with you why fake gurus on social media are able to basically get away with whatever they want right now.”

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Admitted.

REQUEST FOR ADMISSION NO. 10:

Admit that John Mulvehill (a.k.a. John Anthony) currently resides outside the United States.

///

///

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

2 Admitted that Mr. Mulvehill has represented to Defendant that he lives outside the United
3 States.

4 **REQUEST FOR ADMISSION NO. 11:**

5 Admit that you have collaborated with John Mulvehill (a.k.a. John Anthony) since this
6 lawsuit began.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

8 Objection: The term “collaborated with” is vague and ambiguous such that it is impossible
9 to respond to this request. This request is overbroad, unduly burdensome, and is not proportional
10 to the needs of the case. It is not limited in scope to any of the statements at issue or any other
11 issues relevant to the parties’ claims or defenses. Post-suit conduct does not have any relevance
12 to the parties’ claims or defenses, the Complaint contains no reference to such conduct, and the
13 deadline to amend the pleadings has passed.

14 Notwithstanding the foregoing objections, Defendant responds as follows: Admitted that
15 Defendant and Mr. Mulvehill have appeared in a video together since this lawsuit began.

16 Dated: March 21, 2022.

17 Respectfully Submitted,

18 /s/ Alex J. Shepard

19 Marc J. Randazza, NV Bar No. 12265

20 Alex J. Shepard, NV Bar No. 13582

21 RANDAZZA LEGAL GROUP, PLLC

22 2764 Lake Sahara Drive, Suite 109

23 Las Vegas, NV 89117

24 Attorneys for Defendants

25 Spencer Cornelia, Cornelia Media LLC,

26 and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
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Jeffrey Vockrodt, Esq.
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Respectfully submitted,

/s/ Suzanne Levenson
Employee,
Randazza Legal Group, PLLC

EXHIBIT

Defendant Sencer Cornelia's Responses to Plaintiffs' Second Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,

Plaintiff,

v.

SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,

Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT SPENCER CORNELIA'S
RESPONSES TO PLAINTIFFS' SECOND
SET OF REQUESTS FOR ADMISSION
PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Spencer Cornelia hereby respond to Plaintiffs Wealthy Inc. and Dale Buczkowski's (collectively, "Plaintiffs") Second Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

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2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject requests to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which he believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

8. Defendant objects to the Instructions to the extent they impose any obligation beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

9. Defendant incorporates these General Objections into each and every specific response as if fully set forth therein.

Subject to and without waiving the foregoing General Objections, Defendant specifically responds to each numbered Request for Admission as follows:

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 12:

Admit that document WEALTHY000116-000172 is a true and authentic transcript of the Second Video.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Admitted.

REQUEST FOR ADMISSION NO. 13:

Admit that document WEALTHY000448-000461 is a true and authentic transcript of the Third video.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Admitted.

Dated: June 10, 2022.

Respectfully Submitted,

/s/ Alex J. Shepard
Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 10, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
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Jeffrey Vockrodt, Esq.
<jvockrodt@cm.law>
David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Brittani M. Holt
Employee,
Randazza Legal Group, PLLC

RANDAZZA | LEGAL GROUP

EXHIBIT

Defendant Cornelia Media LLC's Responses to Plaintiffs' Second Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,
Plaintiff,
v.
SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,
Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA MEDIA
LLC’S RESPONSES TO PLAINTIFFS’
SECOND SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Media LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski’s (collectively, “Plaintiffs”) Second Set of Requests for Admission Pursuant to FRCP 36.

These responses are made solely for the purpose of, and in relation to, this action. Each response is given subject to all appropriate objections (including but not limited to objections concerning competency, relevancy, materiality, propriety, and admissibility), which would require the exclusion of any statement contained herein if the request were asked of, or any statement contained herein was made by, a witness present and testifying in court. All such objections and grounds therefore are reserved and may be interposed at the time of trial.

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2 implied or inferred. The fact that any request herein has been responded upon should not be taken
3 as an admission, or a concession, of the existence of any facts set forth or assumed by such request,
4 or that such response constitutes evidence of any fact thus set forth or assumed. All responses
5 must be construed as given on the basis of present recollection.

6 **GENERAL OBJECTIONS**

7 1. Defendant objects to the subject requests to the extent that they request the
8 disclosure of information protected by the attorney-client privilege, the work-product doctrine, or
9 any other recognized privilege or immunity.

10 2. Defendant objects to the subject requests to the extent that they do not seek relevant
11 information or are not proportional to the needs of the case. The providing of answers in response
12 to any request is not to be deemed or construed as an admission by Defendant that the information
13 is in fact relevant to this action.

14 3. Defendant objects to the subject requests to the extent that they call for information
15 not in the possession, custody, or control of Defendant.

16 4. To the extent words or phrases used in the requests are vague, ambiguous, or
17 otherwise overbroad, Defendant shall respond in a manner in which it believes, in good faith, to
18 be requested thereby.

19 5. Defendant states that discovery in this matter is continuing and ongoing and that it
20 is possible that additional information responsive to the requests will be identified subsequent to
21 the date of this response.

22 6. All responses made herein are based upon the best knowledge, information, and
23 belief held by Defendant at the time of the response.

24 7. Defendant objects to the Definitions to the extent they conflict with the definitions
25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

RANDAZZA | LEGAL GROUP

1 8. Defendant objects to the Instructions to the extent they impose any obligation
2 beyond that required by the Federal Rules of Civil Procedure or the Local Rules of this Court.

3 9. Defendant incorporates these General Objections into each and every specific
4 response as if fully set forth therein.

5 Subject to and without waiving the foregoing General Objections, Defendant specifically
6 responds to each numbered Request for Admission as follows:

7 **RESPONSES TO REQUESTS FOR ADMISSION**

8 **REQUEST FOR ADMISSION NO. 12:**

9 Admit that document WEALTHY000116-000172 is a true and authentic transcript of the
10 Second Video.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

12 Admitted.

13 **REQUEST FOR ADMISSION NO. 13:**

14 Admit that document WEALTHY000448-000461 is a true and authentic transcript of the
15 Third video.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

17 Admitted.

18 Dated: June 10, 2022.

19 Respectfully Submitted,

20 /s/ Alex J. Shepard
21 _____
22 Marc J. Randazza, NV Bar No. 12265
23 Alex J. Shepard, NV Bar No. 13582
24 RANDAZZA LEGAL GROUP, PLLC
25 2764 Lake Sahara Drive, Suite 109
26 Las Vegas, NV 89117

27 Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 10, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
Tamara Beatty Peterson, Esq.
<tpeterson@petersonbaker.com>
Nikki L. Baker, Esq.
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David Jacoby, Esq.
<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Brittani M. Holt
Employee,
Randazza Legal Group, PLLC

RANDAZZA | LEGAL GROUP

EXHIBIT

Defendant Cornelia Education LLC's Responses to Plaintiffs' Second Set of Requests for Admission Pursuant to FRCP

EXHIBIT

RANDAZZA | LEGAL GROUP

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Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WEALTHY INC. and DALE
BUCZKOWSKI,
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SPENCER CORNELIA, CORNELIA
MEDIA LLC, and CORNELIA
EDUCATION LLC,
Defendants.

Case No. 2:21-cv-01173-JCM-EJY

**DEFENDANT CORNELIA EDUCATION
LLC’S RESPONSES TO PLAINTIFFS’
SECOND SET OF REQUESTS FOR
ADMISSION PURSUANT TO FRCP 36**

Pursuant to Fed. R. Civ. P. 26 and 36, Defendant Cornelia Education LLC hereby responds to Plaintiffs Wealthy Inc. and Dale Buczkowski’s (collectively, “Plaintiffs”) Second Set of Requests for Admission Pursuant to FRCP 36.

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20 is possible that additional information responsive to the requests will be identified subsequent to
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23 belief held by Defendant at the time of the response.

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25 applicable in the Federal Rules of Civil Procedure and/or the Local Rules of this Court.

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Subject to and without waiving the foregoing General Objections, Defendant specifically responds to each numbered Request for Admission as follows:

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 12:

Admit that document WEALTHY000116-000172 is a true and authentic transcript of the Second Video.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Admitted.

REQUEST FOR ADMISSION NO. 13:

Admit that document WEALTHY000448-000461 is a true and authentic transcript of the Third video.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Admitted.

Dated: June 10, 2022.

Respectfully Submitted,

/s/ Alex J. Shepard
Marc J. Randazza, NV Bar No. 12265
Alex J. Shepard, NV Bar No. 13582
RANDAZZA LEGAL GROUP, PLLC
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Las Vegas, NV 89117

Attorneys for Defendants
Spencer Cornelia, Cornelia Media LLC,
and Cornelia Education LLC

Case No. 2:21-cv-01173-JCM-EJY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 10, 2022, I served the foregoing document upon counsel for Plaintiffs Wealthy Inc. and Dale Buczkowski, listed below, via electronic mail:

PETERSON BAKER, PLLC
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Jeffrey Vockrodt, Esq.
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<djacoby@cm.law>
888 Main Street, #543
New York, NY 10044

Respectfully submitted,

/s/ Brittani M. Holt
Employee,
Randazza Legal Group, PLLC

RANDAZZA | LEGAL GROUP

EXHIBIT

Declaration of Tamara Beatty Peterson

EXHIBIT

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9 New York, NY 10044
Telephone: 917.853.0057

10 *Attorneys for Plaintiffs Wealthy Inc. and*
11 *Dale Buczkowski*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 WEALTHY INC. and DALE
15 BUCZKOWSKI,

16 Plaintiffs,

17 v.

18 SPENCER CORNELIA, CORNELIA
19 MEDIA LLC, and CORNELIA
EDUCATION LLC,

20 Defendants.

Case No.: 2:21-cv-01173-JCM-EJY

**DECLARATION OF TAMARA BEATTY
PETERSON**

21 I, Tamara Beatty Peterson, hereby declare under penalty of perjury, as follows:
22

23 1. I am an attorney, duly licensed to practice law in the State of Nevada and counsel
24 of record for Dale Buczkowski and Wealthy Inc. ("Plaintiffs"). I make this Declaration in support
25 of Plaintiffs' Motion for Partial Summary Judgment ("Motion"). I have personal knowledge of the
26 facts set forth below, and if called upon to do so, am competent to testify thereto.
27
28

