

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF KANDIYOHI

EIGHTH JUDICIAL DISTRICT

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Case Type: Jennifer Fischer  
Court File No.: 34-CV-23-12

Steve Quest,

Plaintiff,

vs.

**AMENDED  
COMPLAINT**

Nicholas Rekieta and Rekieta Law, LLC,

Defendants.

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Plaintiff complains of Defendants, and each of them, and for cause thereof states and alleges:

**PARTIES**

## I.

Defendant Nicholas Rekieta resides in the City of Spicer, County of Kandiyohi, State of Minnesota. He is an attorney licensed in the State of Minnesota, and owner of a law firm called Rekieta Law, LLC, a limited liability company duly registered pursuant to Minn. Stat. § 322C, also named as Defendant. Defendants maintain an office presence in the City of Owatonna, County of Steele, State of Minnesota, and also in the City of Spicer, County of Kandiyohi, and State of Minnesota. At all times relevant Defendant Nicholas Rekieta has resided in the County of Kandiyohi, State of Minnesota. At all times relevant, and in addition to practicing law, Defendant Nicholas Rekieta, and on behalf of Defendant Rekieta Law, LLC, has regularly produced videos posted on the internet where he discusses legal matters as well as matters unrelated to his law practice. Video production, as described herein, produces income for Defendants.

## II.

The Plaintiff, Steve Quest, is an entertainer, artist, and video producer who resides in the State of Colorado. Historically, Steve Quest used the name Montagraphy as a trade name for the services he offered and videos he creates. At all times relevant, Steve Quest also uses the name Montagraph, and Monty, derived from the name Montagraphy, as well

as Octoberreignz, as trade names and later as online screen names for video and computer productions.

## FACTS

### III.

At all times relevant, Defendant Nicholas Rekieta created informative videos, which he published using the name of Defendant Rekieta Law, LLC. In addition to offering legal advice and analysis, Defendant Nicholas Rekieta engages in hyperbole and comedy. Upon information and belief, Defendant Nicholas Rekieta writes, directs, produces, and appears in all such videos published using the name of Defendant Rekieta Law, LLC. Defendant Nicholas Rekieta will also appear on shows hosted by others as a guest. All of these shows, productions, are designed primarily for electronic publication via the internet. Some are recorded for later publication, and some are livestreamed, but all work is done for profit as they are accompanied by online advertising.

### IV.

Defendant Nicholas Rekieta will often appear with guests who make appearances from other physical locations, but all appear on a single screen. Some of the discussions are characterized as “lawsplaining” where legal topics and lawsuits are explained while Defendant Nicholas Rekieta drinks scotch whiskey. At all times relevant Defendant Rekieta Law, LLC, is represented within these videos and appears in the form of a stylized logo. Defendants publish and post these videos and productions on Youtube, Rumble, and other hosting services.

### V.

Defendants have engaged in false statements concerning Plaintiff, and published them, of which Plaintiff and others have become aware; Plaintiff has resided in a number of States of the Union including Colorado and Illinois. Despite not being a Minnesota resident, Plaintiff has seen and heard these false statements from observing, watching, and listening to the videos published by Defendants, on the internet, where Defendants know these videos and livestreams can be seen anywhere in the world by anyone with computer access. Defendant Nicholas Rekieta has made statements about Plaintiff, knowing those statements were false, and knowing that by making those false statements, about Plaintiff, he would cause Plaintiff harm. At all times Defendant Nicholas Rekieta made false statements, about Plaintiff, he did so knowing those false statements would be published, defamatory, slanderous, libelous, and would cause Plaintiff harm to his good name, credit, and reputation. There are many such instances to reference, but three specific instances are described in paragraphs VI, VII, and VIII below:

## VI.

On October 6, 2022, Defendant Nicholas Rekieta was a guest on a livestreamed program called Megan Fox Investigates for an interview about why Defendant Nicholas Rekieta was banned from Youtube. During this livestream, Defendant Nicholas Rekieta made various false statements of a sexual nature about Plaintiff.

## VII.

On October 13, 2022, Defendants published a video in which another lawyer named Andrew d'Adesky (also known as Legal Mindset) appeared as a guest. During this published video, Defendant Nicholas Rekieta accused Plaintiff of disgusting crimes against children, pedophilia, then, stated Plaintiff "should probably be shot in the fucking head."

## VIII.

On October 18, 2022, Defendants published a video with several guests who were named as lawyers, Steven Gosney, Sean Martin, and Kurt Mueller serving as a panel, where a meme of guns (AK47s) pointed at Plaintiff's head accompanied by Defendant Nicholas Rekieta making false statements about Plaintiff.

**COUNT I**  
**DEFAMATION AND DEFAMATION PER SE**

## IX.

Plaintiff re-alleges each and every claim, allegation, and paragraph herein and further complaints:

## X.

Defendants, through managers, administrators, and officials acting on behalf of Defendants and within the scope of their employment, including Defendant Nicholas Rekieta, caused to be published to third persons with no privilege, false and defamatory statements, as alleged above, to wit, that Plaintiff engaged in criminal conduct, is a pedophile, pervert, and whose life is worthless and should be ended. Defendant Nicholas Rekieta was working and acting in the scope of his employment, enterprise, as a creator and producer of videos that were published, for profit, when he defamed Plaintiff. Defendants published the aforesaid defamatory statements with knowledge of the falsity and with malice, in wanton disregard for the truthfulness or effect upon Plaintiff and or with reckless indifference to the effect of such publication upon Plaintiff all of which was reasonably foreseeable to Defendant Rekieta Law, LLC.

## XI.

A reasonable person under similar circumstances, who received these defamatory publications, would undoubtedly construe the false statements by Defendant Nicholas Rekieta as repeatedly imputing criminal conduct involving moral turpitude upon Plaintiff.

## XII.

As a direct and proximate result of Defendants' malicious and defamatory statements, with respect to Plaintiff personally, Plaintiff's employment, business and profession have suffered damage, his reputation in his profession and in the community and have suffered, and Plaintiff continues suffering loss of standing and opportunity for growth.

## XIII.

As a direct and proximate result of Defendants' mean-spirited, amoral, and illegal actions, words, and deeds, slander, libel, and false statements, Plaintiff has suffered from distress, humiliation, embarrassment, loss of reputation, loss of enjoyment of life, lost income, wages, money, and Plaintiff has incurred attorney fees and expenses and other serious damages.

**COUNT II**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

## XIV.

Plaintiff re-alleges each and every claim, allegation, and paragraph herein and further complaints:

## XV.

As a direct and proximate result of Defendants' continuing wrongful conduct, baseless accusations, and false statements, Defendants have caused Plaintiff to suffer severe emotional distress and trauma that no reasonable person could be expected to endure.

## XVI.

The course of Defendants' wrongful conduct was so extreme and outrageous that it goes beyond all possible bounds of decency and is utterly intolerable in a civilized society and within the State of Minnesota.

## XVII.

Defendants, by their extreme and outrageous conduct complained of herein, intentionally caused Plaintiff to suffer severe emotional distress.

## XVIII.

As a direct and proximate result of Defendants' illegal actions, words, and deeds, Plaintiff has suffered from distress, humiliation, embarrassment, loss of reputation, loss of enjoyment of life, lost income, and has incurred attorney fees and expenses and suffered other serious damages.

**COUNT II**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

## XIX.

Plaintiff re-alleges each and every claim, allegation, and paragraph herein and further complaints:

## XX.

As a direct and proximate result of Defendants' wrongful conduct, mean-spirited words and deeds, Defendants engaged in a direct invasion of the Plaintiff's rights by their slander, libel, and other like willful, wanton, or malicious conduct which caused Plaintiff to reasonably fear for his life.

## XXI.

Defendants' wrongful conduct, failure to act, redact, apologize, or attempt to withdraw defamatory statements and suggestions that Plaintiff should be killed were negligent and a gross disregard for Plaintiff's well-being and were in direct violation of Plaintiff's rights as a human being.

## XXII.

Defendants' actions, words, and deeds have caused Plaintiff to suffer severe mental and emotional distress.

## XXIII.

As a direct and proximate result of Defendants' illegal actions, words, and deeds, Plaintiff has suffered distress, humiliation, embarrassment, loss of reputation, loss of

enjoyment of life, lost income, and incurred attorney fees, expenses, and other serious damages.

## AMENDMENTS

### XXIV

Plaintiff re-alleges each and every claim, allegation, and paragraph herein and further complaints:

### XXV

Plaintiff hereby amends the complaint, originally served upon Defendants, and renews his request and demand for retraction of Defamatory statements by Defendants against Plaintiff.

### XXVI

Plaintiff hereby amends the complaint, originally served upon Defendants, and offers the following additional general complaints concerning Defendants defamatory statements about Plaintiff, that such statements were false, that such statements referred to the Plaintiff, and that such statements were published. These statements include instances where Defendant Nicholas Rekieta told his audience Plaintiff is a faggot, that Plaintiff "sucks little boys' cocks," that Plaintiff has created a "snuff film" starring a female child actor, that Plaintiff created a "snuff film" starring a male child actor, and that Plaintiff is a "retard." Some of the comments about Plaintiff are accusations of moral turpitude and violation of law, and defamation per se. In addition to defaming Plaintiff, Defendants made comments which were hurtful to Plaintiff including those leading to emotional distress.

Defendants' defamatory statements have tended to so harm the reputation of the Plaintiff that it lowers his esteem in the community, deters others from associating or dealing with Plaintiff, injured his character, subjected Plaintiff to ridicule, contempt, and distrust, and has degraded and disgraced Plaintiff in the eyes of others.

Defendant Nicholas Rekieta has said these things and others repeatedly and continues to defame Plaintiff in published videos. Defendant Nicholas Rekieta usually defames Plaintiff with a "straight face." Nothing about most of his defamatory conduct suggests humor, levity, or that he's joking. Defendant Nicholas Rekieta never couches his criticism of Plaintiff using terms suggesting he is merely offering his opinion. Finally, Defendant Nicholas Rekieta has never retracted any defamatory statements of Plaintiff nor has he apologized. Specific instances, examples of defamation against Plaintiff, mean-spirited statements, and statements which intend to cause harm or were negligently made

to cause harm, include:

On October 6, 2022, Defendant Nicholas Rekieta was a guest on a livestreamed program called Megan Fox Investigates for an interview about why Defendant was banned from Youtube. During this livestream, Defendant made various cruel, false statements and those of a sexual nature about Plaintiff. Specifically, he stated Plaintiff was a "retarded man," suggested Plaintiff had sex with a watermelon, and that Plaintiff has stated he routinely "fists himself."

On October 13, 2022, Defendant Nickolas Rekieta published a video in which another lawyer named Andrew d'Adesky appeared as a guest. During this published video, Defendant accused Plaintiff of pedophilia. Defendant Nicholas Rekieta stated "Plaintiff has always been into sucking little boy cock which is weird, but that's his thing. Look, I'm not here to stop him, I'm just saying, he should probably be shot in the fucking head. Montagraph, you're a fucking faggot, everybody knows you're a faggot. Clip this all you want and sue me if you want you fucking child molesting fucking faggot. Do that. How about you try that."

On October 28, 2022, Defendant Nicholas Rekieta published a video in which he talked about Plaintiff "making a snuff film, about a kid..." And further stating, as a matter of fact, Plaintiff made such a film, further suggesting Plaintiff "made a nasty movie about a kid...and that's why Plaintiff does not have a good name..." Further, Plaintiff stated, as a matter of fact, that "nobody goes, huh, who's Steve Quest? Who's this Montagraph? Oh, he's a fine upstanding citizen. Nobody. Nobody does," and, "bro, I'll take my name over yours. Your good name is garbage, and that's no joke. That's the straight talk..."

On December 22, 2022, Defendant Nicholas Rekieta published a video with several guests and stated "Monty [Plaintiff] is a fucking retard," "you're [Plaintiff] dumb," "Monty [Plaintiff] you don't make any money. You're a weird broke person on the internet. I'd love to see your damages," "[Plaintiff] made a couple movies, and one of his movies is so derided as being pedophilic and violent... There are videos about it... He got removed from every streaming and broadcasting service there was because this is creepy shit with kids."

On January 11, 2023, Defendant Nicholas Rekieta published a video on Youtube in which he called Plaintiff a "retard," that "the ADA had assigned Defendant Nicholas Rekieta a retard who has gone rogue (suggesting Plaintiff is a retard assigned by the ADA to oversee Defendants' business)."

Defendants' specific, defamatory published comments were made with ill-will toward Plaintiff and for improper purposes and to profit from them. Further, they were made without cause or regard to the consequences of such publication, with knowledge these specific statements were false, or, without conducting an investigation into the truth

of such statements before making them, finally, after learning these or any specific statements were not based in fact Defendants have, to-date, refused to retract them.

XXVII

Plaintiff hereby amends the complaint, originally served upon Defendants, and states that Defendants' false, mean-spirited, hurtful words published to others have caused followers and devotees of Defendants to search for, find, then stalk Plaintiff, come to his home, follow him in vehicles as Plaintiff drove a motor vehicle, then to publish pictures and videos of Plaintiff while driving, thus placing Plaintiff into the zone of danger of a physical impact, causing fear for his own safety, and causing emotional distress requiring care and counselling.

WHEREFORE, Plaintiff specifically prays:

- a. That the practices of Defendants complained of herein be adjudged, decreed, and declared in violation of the rights secured by Plaintiff by the laws of the State of Minnesota.
- b. That Defendants be required to make Plaintiff whole and that a permanent prohibitory injunction be issued prohibiting Defendants from engaging in the practices complained of herein.
- c. That Plaintiff be awarded compensatory damages in an amount to be established at trial.
- d. That judgement be entered against the Defendants in a sum in excess of Fifty Thousand (\$50,000) Dollars together with his costs, interest, and disbursements and attorney fees.
- e. That the Court grant such other and further relief as it deems fair and equitable.

**PLAINTIFF DEMANDS TRIAL BY JURY AS TO ALL ISSUES OF FACT.**

Dated: 2/6/2023

SCHNEIDER & MADSEN, P.C.

By: 

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**ACKNOWLEDGMENT**

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. § 549.211, subd. 1, to the party against whom the allegations in this pleading are asserted.



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David W. Schneider (#0254733)



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