

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Terry Green

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10 **JUSTIN BIEBER**

11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES**

14 **JUSTIN BIEBER**, an individual,) CASE NO.
15 Plaintiff,) **20STCV24100**
16 v.) **COMPLAINT FOR DEFAMATION**
17 **JANE DOE-1 (a/k/a DANIELLE)**, an)
18 individual; **JANE DOE-2 (a/k/a KADI)**, an)
19 individual; and DOES 3-10, inclusive,)
20 Defendants.) **[DEMAND FOR JURY TRIAL]**

21 Plaintiff JUSTIN BIEBER (“Plaintiff” or “Bieber”) alleges as follows:

22 **THE NATURE OF THIS CASE**

23 1. Two social-media users’ -- Jane Doe-1 (a/k/a Danielle) and Jane Doe-2 (a/k/a Kadi)
24 (collectively, “Defendants”) anonymously without disclosing their true names -- fraudulently schemed
25 to seek attention and fame by maliciously posting despicable, blatantly false, fabricated, defamatory
26 accusations that Justin Bieber engaged in sexual assault.

27 2. The Defendants’ outrageous lies, published on social media, falsely accuse Bieber of
28 sexual assaults in 2014 and in 2015, including at locations and times that are provably fabricated. The
accusations are factually impossible, and disproven both by indisputable documentary evidence and the
individuals’ own admissions. The malicious statements made by “Danielle” and “Kadi” (who may be
the same person under two accounts) are absolutely false, and their respective heinous accusations that
Bieber engaged in the alleged sexual assaults are outrageous, fabricated lies.

1 some manner responsible or legally liable for the actions, events, transactions and circumstances
2 alleged herein. The true names and capacities of such fictitiously named Defendants are presently
3 unknown to Plaintiff and Plaintiff will seek leave of Court to amend this Complaint to assert the true
4 names and capacities of such fictitiously named Defendants when the same have been ascertained. For
5 convenience, all Defendants shall sometimes be collectively referred to herein as “**Defendants,**” and
6 each reference to a named Defendant herein shall also refer to the Doe Defendants, and each of them.

7 **Defamatory Lies About Bieber**

8 8. While Bieber believes every claim of sexual assault should be taken seriously, Bieber
9 vehemently denies, as outlandish false fabrications, the despicable allegations that he sexually assaulted
10 the women in 2014 and/or 2015. The allegations by Jane Doe-1 (a/k/a Danielle) are factually
11 *impossible*, revealing and evidencing beyond any doubt that her social-media post and allegations are a
12 complete fabrication, an elaborate hoax, for the purpose of garnering attention to her and harming
13 Bieber. Danielle claimed she was sexually assaulted at the Four Seasons Hotel on March 9, 2014,
14 however, Bieber did not stay at that hotel in March 2014 and there are multiple witnesses and
15 documentary evidence to dispute Danielle's malicious lie. The allegations by Jane Doe-2 (a/k/a Kadi)
16 are likewise factually *impossible*, are contradicted by her own prior written statements, are supported
17 only by falsified or faked texts, and her allegations are a complete fabrication for the self-stated purpose
18 of garnering fame and attention, and there are numerous witnesses to contradict Kadi's malicious lies.
19 Based on the timing of their posts and accusations, and information therein, Jane Doe-1 and Jane Doe-2
20 may be either one-and-the-same person or conspired with each other in the dissemination of the
21 defamatory fabrications to boot-strap and support the accusations in a scheme to achieve fame and
22 harm Bieber.

23 **Jane Doe-1 (a/k/a Danielle)'s Defamatory Lies**

24 9. In widely-circulated, but subsequently-deleted tweets, commencing dated June 20,
25 2020 at 10:42 PM PST (the “Danielle June 20th Tweet”) and on June 22, 2020 at 1:57 (the “Danielle
26 June 22nd Tweet”), an individual claiming to be a woman named “Danielle” -- through an anonymous
27 account on Twitter with the handle @danielleglvn -- issued reckless and malicious statements in
28 which she accused Bieber of sexually assaulting her in a hotel room at the Four Seasons Hotel in

1 Austin, Texas, on March 9, 2014 (collectively, the “Danielle Tweets”). Jane Doe-1 (a/k/a Danielle)
2 alleges that she was sexually assaulted by Bieber in his hotel room at the Four Seasons, following his
3 performance at a music event on the night of March 9, 2014, when she was 21 and Bieber was 20.

4 10. In the Danielle Tweets, the account holder states and posted on the @danielleglvn
5 account (the “@Danielleglvn Twitter Account”), among other statements, “***My name is Danielle. On***
6 ***March 9, 2014, I was sexually assaulted by Justin Bieber,***” along with posting images containing a
7 lengthy fictional narrative setting forth the allegations. The Danielle Tweet images contain the
8 statements “*My name is Danielle, and for personal reasons, i will not be stating my last name. I'm*
9 *posting this anonymously because i'm not ready to come forward and reveal myself*” and with the
10 message to Bieber that “***I hope your life is hell after this ...***” Danielle then recites (in the
11 accompanying images) about having met Bieber following his surprise performance at SXSW (a
12 music event) in Austin, Texas, on the night of March 9, 2014, after which she details about how he
13 invited her and her friends to a hotel room at the Four Seasons Hotel, before taking her to his room
14 in the hotel and, after initially consensually making-out, he sexually assaulted her.

15 11. Danielle fabricated her sexual encounter with Bieber at the Four Seasons Hotel
16 because it was publically reported that Bieber had dinner at the Four Seasons Restaurant on March
17 10, 2014 and presumed that Bieber was at the hotel because of the public reports of him dining at the
18 restaurant. However, even though Bieber went to the restaurant, he did NOT stay at the Four
19 Seasons Hotel.

20 12. On June 22, 2020, in the Danielle June 22nd Tweet, the @Danielleglvn account posted
21 “... ***Justin Bieber is a rapist.***” Attached as **Exhibit 1** are true and correct copies of the relevant
22 portions of the Danielle June 20th Tweet and the Danielle June 22nd Tweet.

23 13. All of the foregoing quotes of and statements in the Tweets alleging a sexual encounter
24 and sexual assault disseminated on the @Danielleglvn Twitter Account as made by Danielle, are
25 herein collectively referred to as the “**Defamatory Lies**”. Following the posting of and dissemination
26 of the Tweets and Defamatory Lies, the @Danielleglvn Twitter Account was deactivated (but with
27 Twitter preserving evidence and account records thereof) after Bieber publicly proved that her
28 statements were fabricated lies.

1 14. There is no truth to Danielle’s allegations. The detailed narrative and Defamatory
2 Lies by Danielle are absolutely false, fabricated and fictional. The alleged scenario of a woman with
3 Bieber in a hotel room at the Four Season Hotel in Austin, Texas, on the night of March 9, 2014,
4 and the purported assault, are factually impossible. Her allegations are complete and utter outlandish
5 defamatory fabrications, to harm Bieber, and provably so. It was publically disclosed that Bieber
6 made a surprise appearance the night of March 9, 2014 at SXSW, and random attendees captured
7 photographs of him at the venue.

8 15. Bieber did not stay at and did not have a room the Four Season Hotel on the nights of
9 March 9 and/or 10, 2014, when in Austin, Texas. Following his having made a surprise performance
10 at SXSW late on the night of Sunday, March 9, 2014, Bieber and Gomez stayed together at a rental
11 property managed by DEN Property Group (“Rental Property”), as opposed to the Four Seasons on
12 the night in question. And he stayed, along with friends, at a different hotel, the Westin Austin at the
13 Domain Hotel (the “Westin”), the remainder of his stay in Austin.

14 16. Bieber and his then girl-friend Selena Gomez traveled together to Austin, late Sunday
15 night (March 9), for the show from Houston where Bieber had accompanied Gomez for her show in
16 Houston at the Houston Rodeo. Bieber’s appearance at SXSW was so last minute that the venue’s
17 owner wasn’t informed and didn’t know that Bieber was coming for sure until about 11 PM, when he
18 received a message that Bieber would be showing up about 20-minutes later, and would perform a
19 few songs. In crafting her despicable defamatory story, Danielle apparently did not know that Bieber
20 (as photographed and widely reported, including by US Magazine and other outlets) attended that
21 show with his (then) girlfriend and dedicated a song to her. Following the surprise appearance,
22 ***Bieber and Gomez left the event together*** -- they were photographed by fans and paparazzi in the
23 street and leaving the venue together, pictures of which were published online and reported by gossip
24 media outlets. Photographs show Bieber with Gomez late the night of March 9, 2014 (early AM
25 March 10th) in Austin, and make it clear that they were together that night at the venue, and went
26 from the venue out after and then to the Rental Property, and never went to the Four Seasons Hotel.
27 Bieber and Gomez were together, the entire night, at the Rental Property private residence, along
28 with several of their friends.

1 17. Attached as **Exhibit 2** are true and correct copies of printouts of a US Magazine
2 website article post, CTV News article and Austin360 article, reporting that Bieber and Gomez
3 attended the SXSW event together, that Bieber dedicated a song to her during his performance, and
4 that they stayed together after the event. Attached as **Exhibit 3** is a true and correct copy of a
5 printout of photographs, posted online, documenting that Bieber and Gomez were captured leaving
6 the SXSW event venue together. Attached as **Exhibit 4** is a true and correct copy (with private and
7 personal information redacted) of an email confirmation of the details and receipts of the Rental
8 Property where Bieber and Gomez and friends stayed, and for the Westin Hotel stay the next night.

9 18. The following day, on March 10, 2014, Bieber and Gomez ended their one-night
10 Rental Property stay. While in Austin for the SXSW music event, Bieber's security team was staying
11 at the Westin, and Bieber and a group of friends checked-into the Westin on March 10, 2014, for a
12 three-night stay. Although at no time did he stay at the Four Seasons Hotel, on the evening of March
13 10, 2014 Bieber visited and had dinner at the Four Seasons Hotel Restaurant. Fans and media posted
14 to social media documenting he was at the Four Seasons' Restaurant on March 10, 2014, however,
15 someone fabricating a story about Bieber's time in Austin would not have been aware that he and his
16 friends were not actually staying at the hotel, and had only visited the restaurant at the property for
17 dinner. After checking out of the Westin, Bieber left Austin to return home.

18 19. The detailed narrative and Defamatory Lies by Danielle are ***factually impossible***, and
19 provably false. As he was never there, Bieber could not have, and did not, sexually assault a woman
20 in a hotel room in March 2014 at the Four Season Hotel in Austin, Texas.

21 **Jane Doe-2 (a/k/a Kadi) Defamatory Accusations.**

22 20. In widely-circulated tweets, commencing on June 20, 2020, an individual claiming to be
23 a woman named "Kadi" -- through an account on Twitter with the handle @ItsnotKadi -- issued
24 malicious false statements in which she accused Bieber of sexually assaulting her in a hotel room in
25 New York City following the night of May 4, 2015 (the "Kadi Tweets"). Jane Doe-2 (a/k/a Kadi)
26 alleges that she was sexually assaulted by Bieber in his hotel room at the Langham hotel, after allegedly
27 being invited up to his room at approximately 2:30 AM the morning of May 5, 2015. The allegations
28 are factually *impossible*, revealing and evidencing beyond any doubt that her social-media post and

1 allegations are a complete fabrication, an elaborate hoax. Kadi is a superfan, a Belieber, that sits
2 outside his hotels waiting for photos and appearances, and is desperate to meet him and desperate for
3 his attention and for fame. Kadi has admitted on her Twitter page that she wants to be famous, to be a
4 star on a Netflix series by using Twitter, stating in a pinned tweet “*I wanna star in a netflix series!*
5 *twitter do ur thing*” (Kadi @ItsnotKadi Dec 10, 2018).

6 21. In the Kadi Tweets, the account holder states and posted on the @ItsnotKadi account
7 (the “@ItsnotKadi Twitter Account”), among other defamatory statements, “*I believe Danielle, I am a*
8 *victim of sexual assault by Justin Bieber too,*” “*Just like Danielle, I was sexually assaulted by Justin*
9 *Bieber*” and “*It was 5 years ago when I was assaulted by Justin Bieber,*” along with posting images
10 containing a lengthy fictional narrative in which she details about how she was invited to Bieber’s hotel
11 room with a group of people and then assaulted (Kadi Tweets dated June 20, 2020, 11:36 PM PST) (the
12 “Kadi June 20th Tweet”).

13 22. The Kadi June 20th Tweet is identical, or substantially similar, to the form and method
14 of the Danielle June 20th Tweet, by which it contained a text accusation accompanied by an image
15 containing and displaying a previously prepared lengthy fictional narrative. The Kadi June 20th Tweet
16 was posted (11:36 PM PST) within an hour of the posting of the Danielle June 20th Tweet (10:42 PM
17 PST). The timing of Kadi’s Tweet makes it appear that she knew and had the details of the Danielle
18 Tweet/post prior to its release, and had her accusation ready to also release in conjunction.

19 23. In the Kadi Tweets, Kadi recites about and alleges that, “[o]n *May 4th 2015 evening, I*
20 *went to meet and possibly get a picture with Justin just like any other beliebers when he is in new york.*
21 *From waiting in the evening till early morning of May 5, 2015 in New York City, I met ... (Justin's*
22 *bodyguard) outside of the hotel*” and “*I stayed there waiting and hoping Justin will come out so all of*
23 *us beliebers that have been waiting outside his hotel can get pictures but he didn’t,*” but that “[l]ater
24 ***around 2:30am, I was invited ... to Bieber's hotel (Langham hotel) where there were five girls***
25 *including myself and three other boys [and Bieber] ... I introduced myself and started socializing*
26 *with everybody ...*”

27 24. Kadi then claims, in her defamatory fabricated narrative, that Bieber sexually assaulted
28 her. She further states that, after telling her story to a writer, “a writer ... emailed me and ***asked if i***

1 *knew other girls who have been assaulted by Justin Bieber so that my case will be believable.”*

2 Attached as **Exhibit 5** are true and correct copies of relevant portions of the Kadi June 20th Tweet.

3 25. All of the foregoing quotes of and statements in the Tweets disseminated on the @
4 ItsnotKadi Twitter Account as made by Kadi, are herein collectively referred to as the “**Defamatory**
5 **Kadi Accusations**”.

6 26. There is no truth to the Defamatory Kadi Accusations. The detailed narrative and
7 Defamatory Kadi Accusations are absolutely false, fabricated and fictional. Kadi fabricated her
8 encounter with Bieber at the Langham Hotel in NY because she believed that Bieber had stayed there
9 the night of his attendance at the Met Gala (May 4, 2015). The alleged scenario of a woman being
10 sexually assaulted by Bieber in a hotel room full of people, in New York, on the night of May 4, 2015,
11 is false. The allegations are complete and utter outlandish fabrications, to harm Bieber, and to garner
12 attention and fame to the false accuser. Kadi, as an apparent superfan, may have waited outside his
13 hotel at times, and like other fans, may have managed a fan photograph with him, but (if so) that is
14 where any reality of her story ends, and her false, defamatory statements begin.

15 27. On May 4, 2015, Bieber attended the Met Gala in New York, and then immediately after
16 went to and attended a celebrity hosted private after-party at Up & Down, attended by dozens of other
17 celebrities and witnesses, at which Bieber was photographed in the early hours of May 5, 2015. Bieber
18 did not leave the celebrity after-party until close to 4 AM, when he then stopped at a hot-dog stand,
19 along with others, for a snack. Bieber was photographed going to the after-party and then, at 4 AM,
20 when he stopped at the hot-dog stand. In her fabrication, Kadi claims that she was invited-up and
21 joined Bieber and a group of people hanging-out in his hotel room at 2:30 AM, which was the same
22 time Bieber was actually at the Met Gala after-party with dozens of witnesses. Kadi's story is an
23 *impossibility* – a poor, but damaging, fabrication. Attached as **Exhibit 6** are true and correct copies of
24 an online website article and social media posts, dated May 5, 2015, with photographs of Bieber in
25 attendance at the after-party into the early hours of May 5, 2014, and of Bieber then going to a NYC
26 hot-dog stand at 4 AM.

27 28. In addition, notwithstanding Kadi's allegations as to 5/4/2015 -- posted on June 20, 2020
28 -- she posted and tweeted contradictory statements, that refute or undermine her new allegations,

1 claiming not to have ever met Bieber and that she would not have premarital sex. In a tweet in 2013,
2 replying directly to a @justinbieber tweet, Kadi stated “@justinbieber ... you're so cute I love You!!!
3 *I'll pay you to rape me, ok? "Indianstyle" lmao* (4/21/13 8:49 AM)” (the “Kadi 04/21/2013 Tweet”).
4 And then, in a tweet dated 6/6/2015 -- one month after the date of the alleged assault -- she confirms in
5 a tweet tagging Bieber that she has not met Bieber, but that she wants to and wants to have sex with
6 him if she ever does meet him, tweeting “*I swear if we don't meet I'll find you and fuck you*
7 *@justinbieber #JustinForMMVA*” (Kadi @ItsnotKadi 06/06/2015) (the “Kadi 06/06/2015 Tweet”).
8 The post contradicts her new allegations of objecting to premarital sex, and meeting and being
9 assaulted by Bieber in May 2015. And, in a series of Tweets, dated 6/16/2015, Kadi states and confirms
10 that in 2015 she lived in Los Angeles, California, not NY, where she now claims that in 2015 she
11 would wait at Bieber’s hotel with other beliebers when he’s in town visiting New York (the “Kadi
12 06/16/2015 Tweet”). And in another more recent tweet, on 2/23/2020, Kadi *again* confirms that she
13 has not met Bieber and never will, even though she’s a huge fan, tweeting “*It doesn't matter how good*
14 *of a belieber i am, I'll never get noticed by Justin @yes94 do you agree?* (Kadi @ItsnotKadi 2/23/20)
15 (the “Kadi 02/23/2020 Tweet”). Attached as **Exhibit 7** are true and correct copies of printouts of the
16 Kadi 04/21/2013 Tweet, Kadi 06/06/2015 Tweet, Kadi 06/16/2015 Tweet, Kadi 02/23/2020 Tweet, and
17 Kadi 12/10/18 Pinned Tweet.

18 29. In further ever changing statements and contradictory tweets, Kadi also previously
19 claimed to other social media users to have met Bieber (prior to repeatedly claiming she had not) on the
20 street and/or at a meet and greet, tweeting what appears to be clearly photoshopped fake images
21 superimposing her image into a photo with that of Bieber, with tweets dated 9/9/2014 (the “Kadi
22 09/09/2014 Tweet”). Kadi further appears to be utilizing clearly photoshopped fake text messages to
23 seek to support her allegations and false, fabricated defamatory statements.

24 30. Plaintiff alleges, on information and belief, that Kadi fabricated her allegations for the
25 purpose of and that they arise out of her desire for fame and attention. In a tweet dated 12/10/2018,
26 “pinned” to the top of her Twitter feed (including at the time of her posting the accusations in the Kadi
27 June 20th Tweet), she tweeted that she wants to be famous, stating “*I wanna star in a netflix series!*
28 *twitter do ur thing*” (Kadi @ItsnotKadi Dec 10, 2018) (the “Kadi 12/10/2018 Pinned Tweet”).

1 Attached as **Exhibit 8** is a true and correct copy of a printout of the Kadi 12/10/2018 Pinned Tweet.
2 Kadi appears desperate for fame and attention, and appears to be utilizing social media and false,
3 fabricated accusations to achieve her desire.

4 31. The detailed narrative and Defamatory Kadi Accusations are fabricated malicious lies.
5 Bieber did not sexually assault Kadi, or anyone else, in a hotel room in New York, on the night of
6 May 4, 2015, early AM of May 5, 2015.

7 **FIRST CAUSE OF ACTION**

8 **(Defamation Against Jane Doe-1 (a/k/a Danielle), and Does 3-10)**

9 32. Plaintiff realleges, adopts and incorporates by reference, each and every allegation
10 contained in Paragraphs 1 through 31, inclusive, of this Complaint as if fully set forth herein.

11 33. As alleged herein, Jane Doe-1 (a/k/a Danielle) published her Defamatory Lies recklessly
12 and maliciously, knowing that they were false, or without having any reasonable basis whatsoever to
13 believe that they were true. In fact, when Doe-1 was initially confronted about the falsity of the
14 Defamatory Lies through online responses by Plaintiff's representative, Doe-1's reaction was to
15 immediately remove the Defamatory Lies from and deactivate her Twitter page.

16 34. Doe-1's malicious internet publication of brazen lies falsely accusing Plaintiff of
17 engaging in serious criminal conduct by supposedly sexually assaulting her, resulted in her Defamatory
18 Lies becoming widespread and ubiquitous across the media throughout the United States and the world,
19 causing substantial harm to Plaintiff's reputation.

20 35. By publishing the Defamatory Lies on Twitter, Plaintiff alleges on information and
21 belief that Doe-1 intended that they would be read and re-tweeted and re-posted, and were read and re-
22 tweeted and re-posted, throughout the City and County of Los Angeles and the State of California,
23 where Plaintiff has a residence and does business, as well as throughout the world. In fact, Doe-1
24 specifically stated on her Twitter account page that "I was sexually assaulted by Justin Bieber," "I'm
25 posting this anonymously" and "I hope your life is hell after this ..."

26 36. Among other things, the Defamatory Lies falsely assert that Plaintiff engaged in illegal
27 criminal conduct, and the Defamatory Lies are libelous on their face and clearly expose Plaintiff to
28 hatred, contempt, ridicule and obloquy and/or cause Plaintiff to be shunned or avoided and have a

1 tendency to injure Plaintiff in his occupation.

2 37. The false Defamatory Lies are reasonably susceptible of a defamatory meaning on their
3 face in that they falsely assert that Plaintiff engaged in criminal conduct, and the Defamatory Lies have
4 a direct tendency to injure Plaintiff with respect to his professional reputation, character and business.
5 Plaintiff is informed and believes and based thereon alleges that the Defamatory Lies were written and
6 published by Doe-1 with actual malice with knowledge that they were false, or with a reckless
7 disregard for the truth.

8 38. Plaintiff is informed and believes and based thereon alleges that Doe-1 intentionally
9 portrayed Plaintiff in this manner knowing that the depiction was false, or without any reasonable
10 grounds for believing it to be true.

11 39. The Defamatory Lies disseminated by Doe-1 were unprivileged and were intended by
12 Doe-1 to directly injure Plaintiff with respect to his professional reputation, character, trade and
13 business. Plaintiff is informed and believes and based thereon alleges that Doe-1 and Defendants knew
14 or recklessly disregarded the fact that the Defamatory Lies would likely damage Plaintiff's reputation.

15 40. As a direct and proximate result of the above described conduct by Doe-1 and
16 Defendants, Plaintiff has suffered general and special damages in an amount not presently known, but
17 believed to be not less than Five Million Dollars (\$5,000,000). Although the full nature, extent and
18 amount of these damages are currently unknown, the Complaint will be amended at or before trial to
19 insert such information if such amendment is deemed necessary by the Court.

20 41. Plaintiff is informed and believes and based thereon alleges that Doe-1 and Defendants,
21 in doing the things herein alleged, acted willfully, maliciously, oppressively and despicably with the
22 full knowledge of the adverse effect of their actions on Plaintiff, and with willful and deliberate
23 disregard of the consequences to Plaintiff such as to constitute oppression, fraud or malice. By reason
24 thereof, Plaintiff is entitled to recover punitive and exemplary damages from Defendants in an amount
25 appropriate to punish or set an example of Doe-1 and Defendants and to deter them from engaging in
26 such conduct in the future.

27 ///

28 ///

1 **SECOND CAUSE OF ACTION**

2 **(Defamation Against Jane Doe-2 (a/k/a Kadi), and Does 3-10)**

3 42. Plaintiff realleges, adopts and incorporates by reference, each and every allegation
4 contained in Paragraphs 1 through 31, inclusive, of this Complaint as if fully set forth herein.

5 43. As alleged herein, Jane Doe-2 (a/k/a Kadi) published her Defamatory Kadi Accusations
6 recklessly and maliciously, knowing that they were false, or without having any reasonable basis
7 whatsoever to believe that they were true.

8 44. Doe-2's malicious internet publication of brazen lies falsely accusing Plaintiff of
9 engaging in serious criminal conduct by supposedly sexually assaulting her, resulted in her Defamatory
10 Kadi Accusations becoming widespread and ubiquitous across the media throughout the United States
11 and the world, causing substantial harm to Plaintiff's reputation.

12 45. By publishing the Defamatory Kadi Accusations on Twitter, Plaintiff alleges on
13 information and belief that Doe-2 intended that they would be read and re-tweeted and re-posted, and
14 were read and re-tweeted and re-posted, throughout the City and County of Los Angeles and the State
15 of California, where Plaintiff resides and works, as well as throughout the world. In fact, Doe-2
16 specifically posted on her Twitter account page that "*I wanna star in a netflix series! twitter do ur*
17 *thing,*" pinned to the top of her Twitter feed in conjunction with and at the time of her posting the
18 accusations in the Kadi June 20th Tweet, indicating the intention of it going viral in order to make Kadi
19 famous and be a Netflix star.

20 46. Among other things, the Defamatory Kadi Accusations falsely assert that Plaintiff
21 engaged in illegal criminal conduct, and the Defamatory Kadi Accusations are libelous on their face
22 and clearly expose Plaintiff to hatred, contempt, ridicule and obloquy and/or cause Plaintiff to be
23 shunned or avoided and have a tendency to injure Plaintiff in his occupation.

24 47. The false Defamatory Kadi Accusations are reasonably susceptible of a defamatory
25 meaning on their face in that they falsely assert that Plaintiff engaged in criminal conduct, and the
26 Defamatory Kadi Accusations have a direct tendency to injure Plaintiff with respect to his professional
27 reputation, character and business. Plaintiff is informed and believes and based thereon alleges that the
28 Defamatory Kadi Accusations were written and published by Doe-2 with actual malice with knowledge

1 that they were false, or with a reckless disregard for the truth.

2 48. Plaintiff is informed and believes and based thereon alleges that Doe-2 intentionally
3 portrayed Plaintiff in this manner knowing that the depiction was false, or without any reasonable
4 grounds for believing it to be true.

5 49. The Defamatory Kadi Accusations disseminated by Doe-2 were unprivileged and were
6 intended by Doe-2 to directly injure Plaintiff with respect to his professional reputation, character, trade
7 and business. Plaintiff is informed and believes and based thereon alleges that Doe-2 and Defendants
8 knew or recklessly disregarded the fact that the Defamatory Kadi Accusations would likely damage
9 Plaintiff's reputation.

10 50. As a direct and proximate result of the above described conduct by Doe-2 and
11 Defendants, Plaintiff has suffered general and special damages in an amount not presently known, but
12 believed to be not less than Five Million Dollars (\$5,000,000). Although the full nature, extent and
13 amount of these damages are currently unknown, the Complaint will be amended at or before trial to
14 insert such information if such amendment is deemed necessary by the Court.

15 51. Plaintiff is informed and believes and based thereon alleges that Doe-2 and Defendants,
16 in doing the things herein alleged, acted willfully, maliciously, oppressively and despicably with the
17 full knowledge of the adverse effect of their actions on Plaintiff, and with willful and deliberate
18 disregard of the consequences to Plaintiff such as to constitute oppression, fraud or malice. By reason
19 thereof, Plaintiff is entitled to recover punitive and exemplary damages from Defendants in an amount
20 appropriate to punish or set an example of Doe-2 and Defendants and to deter them from engaging in
21 such conduct in the future.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiff prays for judgment, as follows:

24 **AS TO THE FIRST CAUSE OF ACTION**

25 1. For compensatory damages according to proof at the time of trial in an amount not less
26 than Ten Million Dollars (\$10,000,000), together with interest thereon at the maximum legal rate

27 2. For punitive damages pursuant to Civil Code Section 3294 in an amount appropriate to
28 punish and set an example of Defendants, and each of them, and to deter such conduct in the future, the

1 exact amount of such punitive damages subject to proof at the time of trial;

2 **AS TO THE SECOND CAUSE OF ACTION**

3 3. For compensatory damages according to proof at the time of trial in an amount not less
4 than Ten Million Dollars (\$10,000,000), together with interest thereon at the maximum legal rate

5 4. For punitive damages pursuant to Civil Code Section 3294 in an amount appropriate to
6 punish and set an example of Defendants, and each of them, and to deter such conduct in the future, the
7 exact amount of such punitive damages subject to proof at the time of trial;

8 **AS TO THE ALL CAUSES OF ACTION**

9 5. For pre-judgment and post-judgment interest on the above requested damages and at the
10 maximum legal rate provided by law;

11 6. For costs of suit;

12 7. For reimbursement to Plaintiff of attorney's fees, as provided by law and/or contract

13 8. For such other relief as the Court may deem just and proper.

14
15 Dated: June 25, 2020

LAVELY & SINGER
PROFESSIONAL CORPORATION
MARTI D. SINGER
EVAN N. SPIEGEL

17 */s/ Martin D. Singer*

18 By: _____

19 MARTIN D. SINGER
20 Attorneys for Plaintiff
JUSTIN BIEBER

REQUEST FOR JURY TRIAL

Plaintiff Justin Bieber hereby demands a trial by jury.

Dated: June 25, 2020

LAVELY & SINGER
PROFESSIONAL CORPORATION
MARTI D. SINGER
EVAN N. SPIEGEL

/s/ Martin D. Singer

By: _____

MARTIN D. SINGER
Attorneys for Plaintiff
JUSTIN BIEBER

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EXHIBIT 1



d
@danielleglvn



My name is Danielle. On March 9, 2014, I was sexually assaulted by Justin Bieber.

After hearing about Gabby's story with Ansel, it gave me courage to share mine. So this is a thank you to Gabby.

My name is Danielle, and for personal reasons, I will not be stating my last name. I'm posting this anonymously because I'm not ready to come forward and reveal myself. If he comes across this, you know who I am. I know you remember

Hollywood stuff. Keep in mind this was in 2014, around the time where he was "out of control." Our small kisses then turned into a steamy make-out session. He had pushed me down onto the bed after about 10 minutes of sitting up, got on top of me, started kissing me down my neck and made his way down to my stomach. He found my jeans, unbuttoned them, removed them, and started tracing my underwear with his fingers. My thoughts then started to roam around my head

appeared to be his friend, invited us over to the Four Seasons Hotel. Once again, we said yes. We didn't think anything of it, other than hanging out with a huge celebrity. Fast forward to arriving at the hotel. Justin's friend brought my 2 friends to a room, and he took me to another room. Justin had made me agree to not say anything to anyone, or I can get in serious legal trouble. He asked for my phone and put it to charge. I guess it was an excuse to take it away from me. He then asked me

Although, this was 6 years ago, although I was one year older than him (he was 20, I was 21), I was still sexually assaulted without consent. Fast forward to late last year, I finally decided to speak up about it. I told my close friends and my immediate family. It was hard, but I finally got to tell my story. If you've ever been a victim of sexual assault, I believe you. You and your story matter. You are valid. You are heard. I will stand with you. What happened to me was not okay. It took me

10:42 PM · 6/20/20 · [Twitter for iPhone](#)

EXHIBIT 1

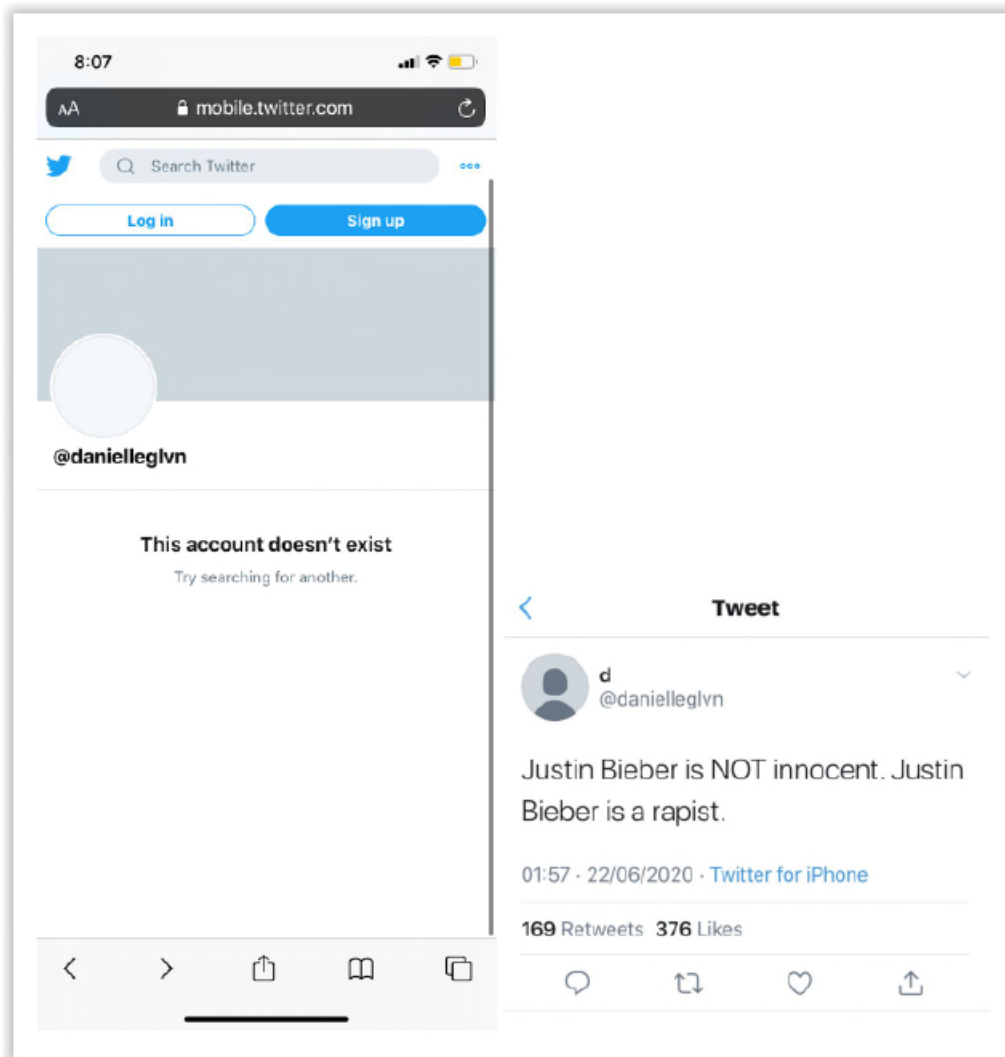


EXHIBIT 1

EXHIBIT 2



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CELEBRITY NEWS

Justin Bieber Dedicates Song to “My Baby” Selena Gomez at Surprise SXSW Show

By Nicole Eggenberger March 10, 2014



With Selena Gomez in the audience, Justin Bieber dedicated “As Long As You Love Me” to “my baby” during a surprise show at SXSW on March 9.
Kevin Mazur/WireImage

Comment



Is Jelena officially back together? **Selena Gomez** watched **Justin Bieber** give a surprise performance at Scooter Braun Projects Sunday Funday Showcase during 2014 SXSW in Texas on Sunday, March 9. The 20-year-old singer dedicated a song to his on-again, off-again girlfriend while on stage on Banger’s Sausage House and Beer Garden.

EXHIBIT 2



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a solo song."

PHOTOS: Justin Bieber and Selena Gomez -- the way they were

In a video captured by his fans (via [Gossip Cop](#)), Bieber told the crowd, "This next song goes out to my baby," before singing his 2012 hit "As Long As You Love Me." The Canadian singer later [tweeted](#): "Fun taking the stage with all the other acts. Great people. Had to do a little acoustic set myself. Maybe I should do another one?"

PHOTOS: Justin Bieber's biggest scandals

The insider tells Us that after the show, Bieber and Gomez, 21, hung out together in the beer hall together for about another hour after the venue cleared out. "Justin and Selena were together the whole time," the source says. "Sitting together, hanging out, and very friendly together."

EXHIBIT 2

[< Home](#)



ENTERTAINMENT

Justin Bieber makes surprise SXSW appearance, dedicates song to Selena Gomez

BANG Showbiz

Published Monday, March 10, 2014 4:50PM EDT

Last Updated Monday, March 10, 2014 7:08PM EDT



Justin Bieber performs at the "Sunday Funday Showcase" at South By SouthWest in Austin, Texas on March 9, 2014. (Provided/Op and Buffalo David Bitton)

SHARE 0 |

<https://www.ctvnews.ca/entertainment/justin-bieber-makes-surprise-sxsw-appearance-dedicates-song-to-selena-gomez-1.1722765>

1/22

EXHIBIT 2

Justin Bieber dedicated a song to Selena Gomez during a surprise performance in Texas yesterday.

The 20-year-old singer turned up at the Banger's Sausage House and Beer Garden in Austin last night for the South by Southwest festival, and sang his hit 'As Long As You Love Me' for his "baby".

The 'Boyfriend' hitmaker told his fans before belting out lyrics to the catchy track, 'This next song goes out to my baby,' as he stared at the 21-year-old singer, who was standing in the wings.

Related Stories

- **No Bieber but plenty of 'Beliebers' at Toronto court proceeding for pop star**
- **Justin Bieber calls Selena Gomez 'most elegant princess in the world'**
- **Police video of Justin Bieber's urine test released**

After Justin's romantic gesture, the pair -- who have been dating on/off since 2010 -- reportedly hung out together in the beer hall for an hour after everyone left the venue.

A source told Us Magazine: "Justin and Selena were together the whole time. Sitting together, hanging out, and very friendly together."

The duo, who split up earlier this year, have sparked rumours they have rekindled their romance recently after they were spotted enjoying a romantic dinner in Texas last weekend.

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EXHIBIT 2



Entertainment

Justin Bieber performed surprise SXSW show Sunday at Banger's

By Arianna Auber

Posted Dec 28, 2016 at 12:01 AM

Updated Sep 23, 2018 at 12:25 PM

Editor's note: This article was originally published March 10, 2014

Rumors on Twitter of internationally recognized pop star Justin Bieber coming to Austin for South by Southwest didn't seriously fly until Sunday night, when he was already performing at Banger's Sausage House and Beer Garden, a Rainey Street bar hosting a private SXSW party for SB Projects, the talent management company that represents Bieber.

The show was so last minute that Banger's owner Ben Siegel didn't know Bieber was coming for sure until about 11 p.m., when he received a text from one of the party organizers that said Bieber would be showing up in about 20 minutes.

"We were outside with all the artists (from the Sunday party) who were doing a jam session," Siegel said. "We didn't even know he had arrived yet. They were all passing the mic around, doing covers of different songs, when he came out and sang."

Performers at the Sunday Funday Showcase – an all-day show that closed Banger's to the public – included Cody Simpson, Tori Kelly and other clients of SB Management, all singers who drew a primarily younger, Bieber-friendly crowd to the bar.

Bieber hadn't been on the set list at all, but said on Saturday that he wanted to play at Banger's after leaving Houston on Sunday night, where he accompanied Selena Gomez for her show at the Houston Livestock Show and Rodeo.

“At first they said he’s definitely coming, and then maybe around 7 or 8 o’ clock (Sunday) they said he wasn’t coming,” Siegel said.

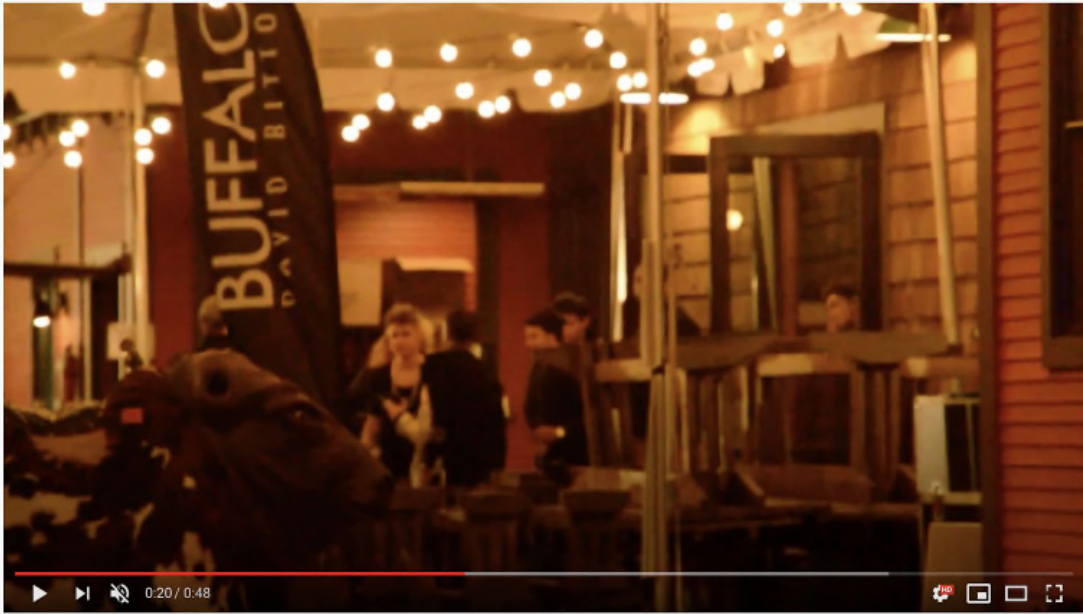
After that initial performance onstage with the other singers, Bieber sang again – this time his smash 2012 single “As Long As You Love Me” – which ran the party much later than expected.

But fan reaction to Bieber never got out of control, Siegel said. Although “things got more hectic” once he arrived, the 400 or so people at the event remained relatively behaved, possibly thanks to the increased police presence on Rainey Street.

A city of Austin spokesman confirmed last night that additional police officers had been dispatched to the area after sightings of Bieber were reported.

EXHIBIT 2

EXHIBIT 3



Justin Bieber coming out of Bangers at SXSW 2014

725 views · Mar 11, 2014

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EXHIBIT 3

 **Selena Gomez News**
@Selena4life10


Selena Gomez & Justin Bieber in Austin, TX - March 9, 2014 #3




SB Projects Sunday Funday SXSW 201
157K views · 6 years ago

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1.4K 19.1K 71.6K

 **Selena Gomez News**
@Selena4life10

Selena Gomez & Justin Bieber in Austin, TX - March 9, 2014 #3



8:01 AM · 3/10/14 · Twitter for iPhone

308 Retweets 276 Likes

EXHIBIT 3



EXHIBIT 3

EXHIBIT 4

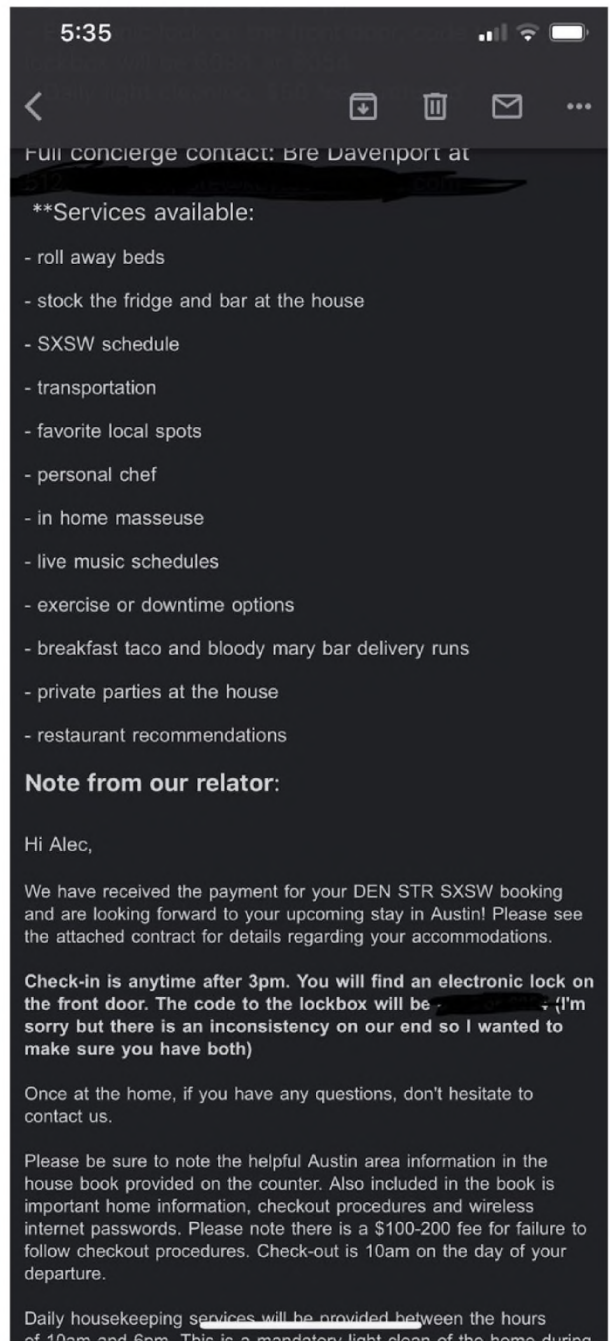
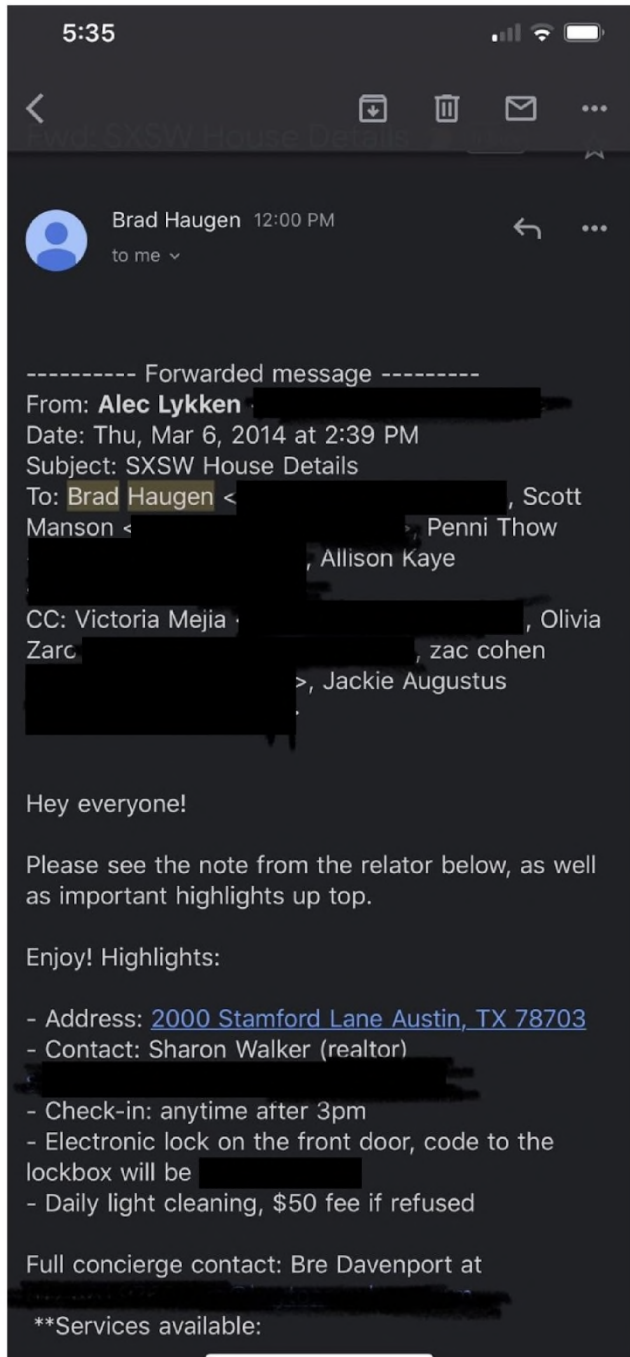


EXHIBIT 4

Guest License Agreement

HOMEOWNER NAME: [REDACTED] (Local Contact Sharon Walker)
HOMEOWNER ADDRESS: 2000 Stamford Lane
City, ST, ZIP: Austin, TX 78703
HOMEOWNER EMAIL: Local Contact - sharon [REDACTED]
HOMEOWNER PHONE: Local Contact - (512) [REDACTED]
DATE: 03/04/2014

Reservation Information

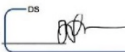
Check-In Date: 03/07/2014 after 3pm CST (No early check-in please)
Checkout Date: 03/16/2014 by 10am CST (No late check-out please)
Number of Guests: 11 adults, 0 children

Property Address:
PROPERTY ADDRESS: 2000 Stamford Lane (Tarrytown Lane 2)
City, ST, ZIP: Austin, TX 78703

Payments

Reservation Deposit	\$ 3500.00	
Use Fee	\$ [REDACTED]	
Additional Persons	\$ 0.00	
Cleaning Fee	\$ 400.00	
Housekeeping Service (Optional)	\$ 0.00	
Subtotal	\$ [REDACTED]	
Taxes (15%)	\$ [REDACTED]	
Total:	\$ [REDACTED]	+ Reservation Deposit \$ 3500.00
Total Amount Due:	\$ [REDACTED]	

Payment Methods Accepted:
Checks made payable to: DEN STR (Also accepting wire and CC)
REMIT TO: 317 W. 3rd Street
Austin, Texas 78701

Initial Here 

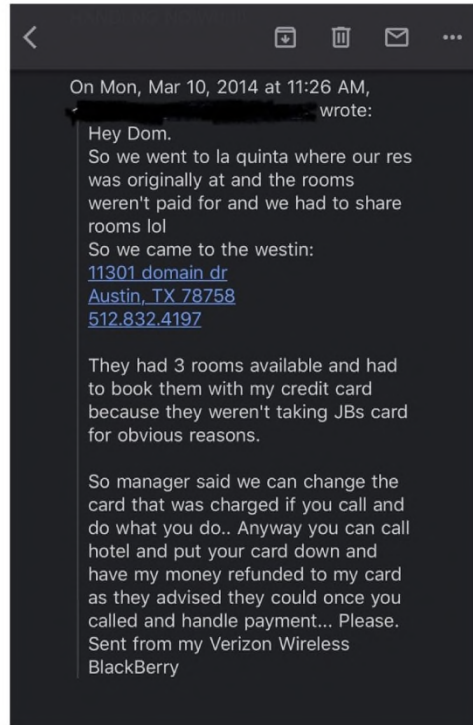
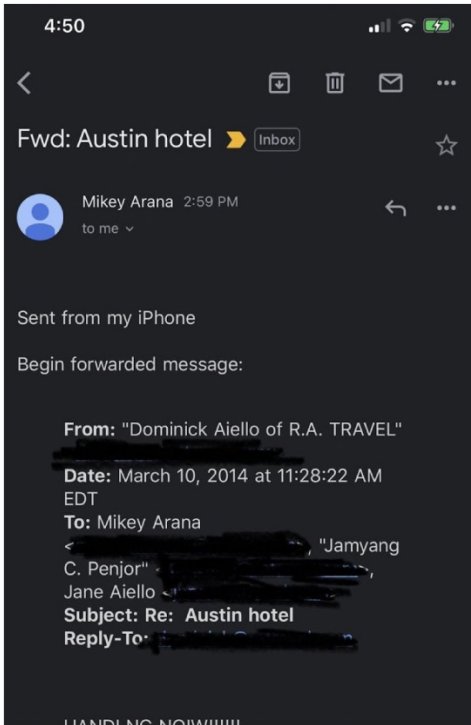


EXHIBIT 4



39 WEST 14TH STREET SUITE 306
NEW YORK, NY 10011
USA

Invoice

Date	Invoice #
5/15/2014	10079652

Bill To BT TOURING LLC.	Ship To
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PAID
06/12/2014

ORDERED BY	P.O. No.	AGENT	PROJECT/JOB
		DA	

Description	Qty	Rate	Amount
Hotel Reservation: Property: Westin Austin At the Domain Address: 11301 Domain Drive, Austin, TX 78758			
Hotel Reservation: Guest: Lowery/Mike Check in date: March 10, 2014 - Check out date: March 13, 2014			
Hotel Reservation: Guest: Basallo/Florido; Patterson/Dwayne; Farmer/Brandon Check in date: March 10, 2014 - Check out date: March 13, 2014			
Hotel Reservation: Guest: Nilsson/Patrick; Ilieva/Victoria; Shahidi/John Check in date: March 10, 2014 - Check out date: March 13, 2014			
Hotel Reservation: Guest: Arana/Michael Check in date: March 9, 2014 - Check out date: March 12, 2014			
Hotel Reservation: Guest: Samuel/Alicia; Hesney/Hugo Check in date: March 9, 2014 - Check out date: March 13, 2014			
Hotel Reservation: Guest: Demoura/Nick Check in date: March 10, 2014 - Check out date: March 11, 2014			
Hotel Reservation: Guest: Gudwin/Joshua Check in date: March 10, 2014 - Check out date: March 13, 2014			
Incidentals for Mike Lowery			
Incidentals for Nick Demoura			
Incidentals for Joshua Gudwin			
Incidentals for John Shahidi			
Incidentals for Alicia Samuel			

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EXHIBIT 4

EXHIBIT 5



Kadi
@ItsnotKadi



I believe Danielle, I am a victim of sexual assault by Justin Bieber too

June 20, 2020 at 11:36 PM

Hi, my name is Kadi.

Just like Danielle, I was sexually assaulted by Justin Bieber.

It was 5 years ago when I was assaulted by Justin Bieber

On May 4th 2015 evening, I went to meet and possibly get a picture with Justin just like any other believers when he is in new york. From waiting in the evening till early morning of May 5, 2015 in New York City, I met Mikey (Justin's bodyguard) outside of the hotel & he found me attractive and gave me his phone number without taking mine. I stayed there waiting and hoping that Justin will come out so all of us believers that have been waiting outside his hotel can get pictures but he didn't.

Later around 2:30am, I was invited by Mikey Arana to Bieber's hotel (Lanaham hotel) where there were

living room.

I told my sister what happened but she asked me to stay quiet about it because it'll ruin my family's honor and I never will be married.

The fear of being called a disgrace by my family and be disowned made me rethink. I went to rehab, for mental treatment in fear of killing myself (because I've tried).

I remained silent until last year in 2017 when i saw the #metoo movement. But after I tweeted about it that my case will be believable. I said I don't, and I haven't heard back from her since. That's when I decided to go to the law enforcement and never let an assailant go easily knowing how bad it can mess ones mental health.

Attached are the messages from Mikey and Arianna and Amanda.

1:39 AM · Jun 21, 2020 · [Twitter for iPhone](#)

EXHIBIT 5

EXHIBIT 6

WELCOME! ▶ The New E! Online Is Here!

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HOT TOPICS

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Rihanna's Post-Met Gala Party Sees Justin Bieber, Selena Gomez and More Dancing the Night Away—All the Details and Pics!

Stars turned out in waves to party at Up & Down

By FRANCESCA BACARDI MAY 05, 2015 8:19 AM TAGS ▼



<https://www.eonline.com/news/653554/rihanna-s-post-met-gala-party-sees-justin-bieber-selena-gomez-and-more-dancing-the-night-away-mdash-all-th...> 1/9

EXHIBIT 6



Dara Kushner/INFphoto.com

Share  Tweet 

The **2015 Met Gala** was the ultimate place to see and be seen, but **Rihanna's** after party at Up & Down wasn't too shabby either!

Celebrities turned out in waves (after they changed out of their tuxedos and wild gowns) to end their nights with a bang, including **Selena Gomez**, **Kylie Jenner**, **Tyga** and even **Justin Bieber**! But a source tells E! News that even though Jelena spent a lot of time in the same room together, they didn't have *too* much of a run in and "exchanged some words" over the course of the night. We guess they're pretty cordial!

The source adds that Bieber spent most of his night "dancing and having a great time with his friends."

"He hung out with **Kendall [Jenner]** and that crew a bit as well," the source tells us. "Everyone was dancing and having an amazing time."

PHOTOS: 2015 Met Gala arrivals

<https://www.eonline.com/news/653554/rihanna-s-post-met-gala-party-sees-justin-bieber-selena-gomez-and-more-dancing-the-night-away-mdash-all-th...> 2/9

EXHIBIT 6



PC-NWP / Splash News

The "We Found Love" singer's party united a lot of rumored couples, including Kylie and Tyga. But the source notes that "there were no PDA moments at all, but they were definitely hanging out." The *Keeping Up With the Kardashians* star and her **rumored rapper boyfriend** continue to keep us on our toes! But even though there weren't any "PDA moments" it was clear to attendees that they were together.

"Tyga and Kylie were flirting as it got later in the evening and everyone knew they were a couple," the source says.

Seeing as this get-together happened at Up & Down, you can imagine how late—or early morning—it must have been! According to our source it quickly went from an after party to an after-after party LOL. As the night progressed, Bieber also was spotted with his mentor, **Usher**, and gal-pals **Hailey Baldwin** and **Shanina Shaik**. **Madonna** even made an appearance at the "Bieber table," according to our source.

PHOTOS: Best beauty looks at the 2015 Met Gala

TRENDING STORIES

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1

Love Is Blind's Jessica Reacts to Mark Cheating Allegations

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Black Eyed Peas Reveal the Real Reason Fergie Is No Longer in Group

<https://www.eonline.com/news/653554/rihanna-s-post-met-gala-party-sees-justin-bieber-selena-gomez-and-more-dancing-the-night-away-mdash-all-th...> 4/9

EXHIBIT 6

www.eonline.com › news › rihanna-s-post-met-gala-par... ▾

[Rihanna's Post-Met Gala Party Sees Justin Bieber, Selena ...](#)

May 5, 2015 - The 2015 **Met Gala** was the ultimate place to see and be seen, but **Rihanna's after party** at Up & Down wasn't too shabby either! Celebrities ...

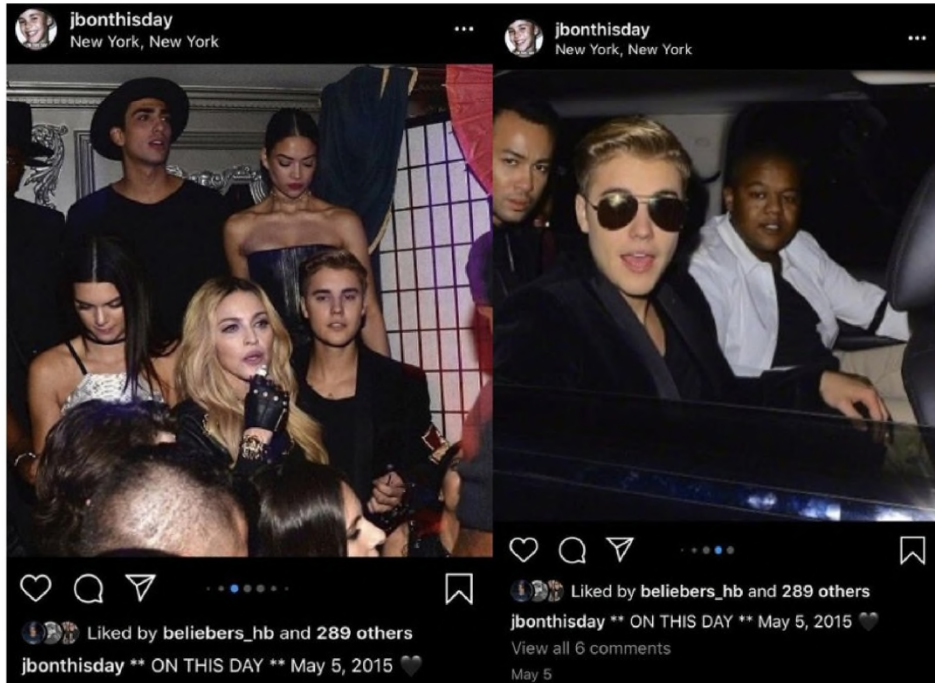


EXHIBIT 6



kylemassey: 4am NYC hot dogs with @justinbieber and @DarnellRobinson 🙏 #MetGala 📸 #NYC #HOTDOG - via Instagram



14:52 · 05/05/2015 · Twitter for iPhone



EXHIBIT 6

EXHIBIT 7



EXHIBIT 7



EXHIBIT 7



MarkyMarc 😊 @mar... · 6/16/15 ✓

@Sweetkadi @justinbieber I definitely will! which part are you in? LA?



Kadi @ItsnotKadi · 6/16/15 ✓

@marcillal Ashe @justinbieber LA, Hollywood



MarkyMarc 😊 @marcillal Ashe ✓

Replying to @ItsnotKadi

@Sweetkadi @justinbieber that's where I plan on going.

13:35 · 6/16/15 · Twitter for iPhone

EXHIBIT 7

Pinned Tweet



Kadi @ItsnotKadi · Dec 10, 2018

I wanna star in a netflix series! twitter do ur thing



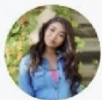
737

2.3K

4.6K

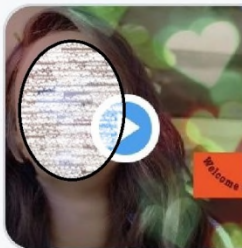


[Show this thread](#)



Kadi @ItsnotKadi · Dec 16, 2018

Here's my reel



My reel / Showreel ...

This is a response to my " I wanna start in a Netflix series. Twitter do ur thing " Tweet that went viral. ...

[youtube.com](#)

68

62

202



EXHIBIT 7