

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NIKKO D'AMBROSIO,)
)
) Plaintiff,)
)
) v.)
)
) ABBIGAIL RAJALA,)
) RODNEY RAJALA,)
) CAROL RAJALA,)
) SAM DANIELS,)
) ALEXIS KYLE,)
) PAOLA SANCHEZ,)
) CORALINE LOTZ,)
) DIANNE WESLEY,)
) MADISON PIERCE,)
) MADISON BYNUM,)
) VANESSA VILLATORO,)
) CHRISTY GRAESSLE,)
) SHARLEEN WAA,)
) KAITLYN MISHAY MOODY,)
) LINDA JUAREZ,)
) AMBER MICHELLE,)
) LAURA MADDOX,)
) ALINA DRAKE,)
) CHANDI CONSTANCE,)
) ALICIA ANN,)
) SALISHA P. DEEN,)
) JILLIAN CARA,)
) JEN RAHBAR,)
) SHANNON MARIE,)
) LUISA RESENDEZ,)
) DARYL CEASER,)
) LISA MIKO,)
) AMY DUKSTEIN-REYNOLDS,)
) MELISSA PINKERTON,)
) MONICA TCHORZEWSKA,)
) AWDTSO, INC., a Delaware Corporation,)
) META PLATFORMS, INC., a Delaware Corporation,)
) META PLATFORMS TECHNOLOGIES, INC, a Delaware Corporation,)
) FACEBOOK ENTERTAINMENT, LLC, a Delaware Corporation,)
) FACEBOOK GLOBAL HOLDINGS I, LLC, a Delaware Corporation,)
) FACEBOOK GLOBAL HOLDINGS I, INC., a Delaware Corporation,)
) FACEBOOK GLOBAL HOLDINGS II, LLC, a Delaware Corporation,)
) FACEBOOK GLOBAL HOLDINGS III, LLC, a Delaware Corporation,)
) FACEBOOK MEDIA PRODUCTIONS, LLC, a Delaware Corporation,)
) FACEBOOK OPERATIONS, LLC, a Delaware Corporation,)
) FACEBOOK PROCURMENT, LLC, a Delaware Corporation,)
) FACEBOOK AD MANAGEMENT, LLC, a Delaware Corporation,)
) FACEBOOK HOLDINGS, LLC, a Delaware Corporation,)
) FACEBOOK INTERNATIONAL, LLC, a Delaware Corporation,)
) FACEBOOK INVESTOR GROUP, LLC, a Delaware Corporation,)
) FACEBOOK, LLC, a Delaware Corporation,)
) FACEBOOK MEDIA, LLC, a Delaware Corporation,)
) FACEBOOK MIAMI, INC., a Delaware Corporation,)
) FACEBOOK OVERSEAS, INC, a Delaware Corporation,)
) FACEBOOK PROPERTY, LLC, a Delaware Corporation,)
) FACEBOOK SERVICES, INC., a Delaware Corporation,)
) FACEBOOK SHOP, INC., a Delaware Corporation,)
) FACEBOOK CIRCULARITY, LLC, a Delaware Corporation,)
) PATREON, INC., a Delaware Corporation,)
) GOFUNDME, Inc., a Delaware Corporation,)
) JANE DOE, Unnamed Defendants,)
)
) Defendants.)

Case No.

JURY TRIAL DEMANDED

**CLASS ACTION CERTIFICATION REQUESTED
PURSUANT TO RULE 23**

COMPLAINT AT LAW

Now comes the Plaintiff, Nikko D'Ambrosio, by and through undersigned counsel, and complaining of the Defendants, states as follows:

NATURE OF THE ACTION

This is an action for declaratory and injunctive relief and for damages against Defendants for false and defamatory statements made and published by Defendants concerning Plaintiff under the Illinois Slander and Libel Act (740 ILCS 145), to protect Plaintiff's rights to be free from the deliberate unauthorized dissemination of Plaintiff's personal identifying information under the Illinois Civil Liability for Doxing Act (740 ILCS 195), Misappropriation under the Illinois Right to Publicity Act (765 ILCS 1075), and common law causes of action.

PARTIES

1. The Plaintiff, Nikko D'Ambrosio is an adult male who resides in the territorial jurisdiction of the District Court.
2. The Defendant, Abbigail Rajala, is an adult female who resides in the State of Michigan.
3. The Defendant, Rodney Rajala, is an adult male who resides in the State of Michigan.
4. The Defendant, Carol Rajala, is an adult female who resides in the State of Michigan.
5. The Defendant, Sam Daniels, is an adult female whose residence State is unknown at this time.

6. The Defendant, Alexis Kyle, is an adult female whose residence State is unknown at this time.

7. The Defendant, Paola Sanchez, is an adult female who resides in the State of New York.

8. The Defendant, Coraline Lotz, is an adult female who resides in the State of New York.

9. The Defendant, Dianne Wesley, is an adult female who resides in the State of New York.

10. The Defendant, Madison Pierce, is an adult female whose residence State is unknown at this time.

11. The Defendant, Madison Bynum, is an adult female who resides in the State of South Carolina.

12. The Defendant, Vanessa Villatoro, is an adult female whose residence State is unknown at this time.

13. The Defendant, Christie Graessle, is an adult female who resides in the State of Indiana.

14. The Defendant, Sharleen Waa, is an adult female whose residence State is unknown at this time.

15. The Defendant, Kaitlyn Mishay Moody, is an adult female who resides in the State of Texas.

16. The Defendant, Linda Juarez, is an adult female who resides in the State of Texas.

17. The Defendant, Alina Drake, is an adult female who resides in the State of Florida.

18. The Defendant, Chandi Constance, is an adult female who resides in the State of Pennsylvania.

19. The Defendant, Alicia Ann, is an adult female whose residence State is unknown at this time.

20. The Defendant, Salisha P. Deen, is an adult female who resides in the State of New York.

21. The Defendant, Jillian Cara, is an adult female who resides in the State of Ohio.

22. The Defendant, Jen Rahbar, is an adult female who resides in the State of California.

23. The Defendant, Shannon Marie, is an adult female whose residence State is unknown at this time.

24. The Defendant, Luisa Resendez, is an adult female who resides in the State of Florida.

25. The Defendant, Daryl Ceaser, is an adult female who resides in the State of Illinois.

26. The Defendant, Lisa Miko, is an adult female who resides in the State of Michigan.

27. The Defendant, Amy Dukstein-Reynolds, is an adult female who resides in the State of Illinois.

28. The Defendant, Melissa Pinkerton, is an adult female who resides in the State of Illinois.

29. The Defendant, Monica Tchorzewska, is an adult female who resides in the State of Illinois.

29. The Defendant, AWDTSO, Inc., is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media networks described above in conjunction with its website, www.aredatingthesame.com.

30. The Defendant, Meta Platforms, Inc, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

31. The Defendant, Meta Platforms Technologies, Inc, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

32. The Defendant, Facebook Entertainment, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

33. The Defendant, Facebook Global Holdings I, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

34. The Defendant, Facebook Global Holdings I, Inc., is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

35. The Defendant, Facebook Global Holdings II, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operated the social media network known as Facebook.com.

36. The Defendant, Facebook Global Holdings III, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

37. The Defendant, Facebook Media Productions, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

38. The Defendant, Facebook Operations, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

39. The Defendant, Facebook Procurement, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

40. The Defendant, Facebook Ad Management, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

41. The Defendant, Facebook Holdings, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

42. The Defendant, Facebook International, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

43. The Defendant, Facebook Investor Group, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

44. The Defendant, Facebook, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

45. The Defendant, Facebook Media, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

46. The Defendant, Facebook Miami, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

47. The Defendant, Facebook Overseas, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

48. The Defendant, Facebook Property, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

49. The Defendant, Facebook Services, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

50. The Defendant, Facebook Shop, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

51. The Defendant, Facebook Circularity, LLC, is a corporation registered and authorized to do business in the State of Delaware and owns and operates the social media network known as Facebook.com.

52. The Defendant, Patreon, Inc., is a corporation registered and authorized to do business in the State of Delaware and owns and operates the crowdfunding platform known as Patreon.com.

53. The Defendant, GoFundMe, Inc., is a corporation registered and authorized to do business in the State of Delaware and owns and operates the crowdfunding platform known as Gofundme.com.

54. Plaintiff is unaware of the true names and capacities of several prospective Defendants sued herein as Jane Doe, and therefore Plaintiff sues these Defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and therefore alleges that each fictitiously named

Defendant is responsible in some manner for the occurrences alleged and Plaintiff's injuries as herein alleged were proximately caused by said Defendants.

JURISDICTION

Jurisdiction is proper pursuant to 28 U.S.C. § 1332 for diversity of citizenship as the parties to this action are citizens of different States and the amount in controversy exceeds \$75,000.00.

VENUE

This Court has jurisdiction over this action under 28 U.S.C. §1391(b)(2) in that all or a substantial part of the events or omissions giving rise to the claim occurred within this district.

FACTS

55. "Are We Dating the Same Guy?" is a collection of social groups maintained on various social media platforms throughout the internet by Defendants. Said platforms purport to provide an anonymous platform for women to discuss and disparage men in their local communities with which they have had allegedly unsatisfactory dating experiences. The collection of online communities claims to have over 3,000,000 registered users. *See Exhibit A.*

56. "Are We Dating the Same Guy?" self-describes its community as "Red Flag Awareness groups all across the country where women can empower each other and keep each other safe from toxic men." The group pontificates to the world that they are doing the "[L]ord's work" by maintaining a platform to permit women to anonymously dox, defame, and attack the moral character of men they've met online and publishing same. *See Exhibit A.*

57. The "Are We Dating the Same Guy?" network of social platforms is divided into several subgroups reflecting major metropolitan areas in the United States and Canada for the purposes of organization. Each and every platform or subgroup carrying the "Are We Dating the

Same Guy?” branding on any social media platform is operated by the same or a substantially similar group of individuals to Defendants listed herein, inclusive of, without limitation:

- a. “Are We Dating the Same Guy? | Greater Toronto Area”
- b. “Are We Dating the Same Guy? | Ottawa”
- c. “Are We Dating the Same Guy? | Greater Vancouver”
- d. “Are We Dating the Same Guy? | Calgary”
- e. “Are We Dating the Same Guy? | Winnipeg”
- f. “Are We Dating the Same Guy? | Edmonton ”
- g. “Are We Dating the Same Guy? | Montreal”
- h. “Are We Dating the Same Guy? | New York”
- i. “Are We Dating the Same Guy? | Miami”
- j. “Are We Dating the Same Guy? | Chicago”
- k. “Are We Dating the Same Guy? | Boston”
- l. “Are We Dating the Same Guy? | Philadelphia”
- m. “Are We Dating the Same Guy? | New Jersey”
- n. “Are We Dating the Same Guy? | Nashville”
- o. “Are We Dating the Same Guy? | New Orleans”
- p. “Are We Dating the Same Guy? | Salt Lake City”
- q. “Are We Dating the Same Guy? | Dallas”

- r. “Are We Dating the Same Guy? | San Jose”
- s. “Are We Dating the Same Guy? | Fort Lauderdale”
- t. “Are We Dating the Same Guy? | Tampa”
- u. “Are We Dating the Same Guy? | Denver”
- v. “Are We Dating the Same Guy? | Minnesota”
- w. “Are We Dating the Same Guy? | Greater Los Angeles Area”
- x. “Are We Dating the Same Guy? | Atlanta”
- y. “Are We Dating the Same Guy? | St. Louis”
- z. “Are We Dating the Same Guy? | Houston”
- aa. “Are We Dating the Same Guy? | Austin”
- bb. “Are We Dating the Same Guy? | Phoenix”
- cc. “Are We Dating the Same Guy? | San Diego”
- dd. “Are We Dating the Same Guy? | San Antonio”
- ee. “Are We Dating the Same Guy? | Nevada Area”
- ff. “Are We Dating the Same Guy? | Columbus”
- gg. “Are We Dating the Same Guy? | Indiana”
- hh. “Are We Dating the Same Guy? | Seattle”
- ii. “Are We Dating The Same?”; [aredatingthesame.com](https://www.aredatingthesame.com)

58. Each and every one of the listed individual Defendants has been authorized by AWDTSG, Inc. and has engaged in the creation, maintenance, publishing, and marketing of defamatory statements and personally identifiable information, either as a user or administrative officer, of a subgroup of “Are We Dating the Same Guy?” known as “Are We Dating the Same Guy? | Chicago” (The “Chicago Subgroup”) maintained on the social network Facebook. Said subgroup contains over 80,000 members. As a result, each and every one of the listed individual Defendants operates as an agent of AWDTSG, Inc in performing the creation, maintenance, publishing, and marketing of said defamatory statements and personally identifiable information.

59. Some administrators digitally monetize the “Are We Dating the Same Guy” Platform via Patreon, GoFundMe, and other crowdfunding platforms. *See Exhibits A and D.*

60. That the Chicago Subgroup publishes dozens of statements and narratives daily from women who wish to provide personally identifiable information about a man in the community with which they allege to have had a dating relationship. Thousands of men have been potentially defamed by members of the groups via these online publications, and remain entirely unaware of the attacks on their character as a result of the social media group’s private status and heavily moderated members list.

61. No independent fact-checking of the statements made by any woman published in the Chicago Subgroup occurs. Women are permitted to make statements, publish photographs, defame, threaten, harass, belittle, or otherwise attack men whom they allege to have engaged in a dating relationship with void of any oversight and with total impunity.

62. That in 2023, Plaintiff and Defendant Abbigail Rajala met organically at a cultural event in Chicago, Illinois and briefly communicated with one another. Plaintiff and Defendant

Abbigail Rajala engaged in consensual sexual intercourse on the evening they first met. The parties spent brief periods of time together on dates on a handful of occasions which were unremarkable. The parties never engaged in an exclusive dating relationship.

63. That in November 2023, Defendant Abbigail Rajala published provably false and defamatory statements pertaining to Plaintiff and disseminated same amongst members of the “Are We Dating the Same Guy? | Chicago” Facebook group, knowing said statements to be false and defamatory. Defendant Abbigail Rajala further published a photograph of Plaintiff. *See Exhibit B.*

64. That as a part of the Defendants’ maintenance of said platform, Defendants engage in content moderation, which involves the review and approval of member applications, statements, and/or “posts” made on the platform.

65. That as a part of Defendants’ content moderation responsibilities, Defendants would have reviewed the false and defamatory statements made about Plaintiff and approved same for publication on their platform.

66. That on or about December 15, 2023, Defendants were contacted by Plaintiff and his attorneys demanding the removal of said false and defamatory statements.

67. That immediately following Plaintiff’s contact of Defendants, Defendant Abbigail Rajala removed her post on the platform containing the false and defamatory statements about Plaintiff, and republished same under an “Anonymous” handle on the “Are We Dating the Same Guy? | Chicago” Facebook group in an effort to avoid the detection of her identity. *See Exhibit C.*

68. That the Chicago Subgroup, along with all other listed subgroups referenced above, is maintained as an “invite-only” group on the Facebook platform intentionally and for

the sole purpose of preventing subjects of the Defendants' defamatory vitriol from becoming aware of the existence of same.

69. That as of January 2, 2023, Defendant Abbigail Rajala's "anonymous" post remains in the Chicago Subgroup and continues to be republished and retransmitted to third parties upon each client-side connection to the website. Although Defendants typically refrain from posting the last names of the men they are seeking to defame, a search through the Facebook search engine system within the relevant Facebook group for the full legal name of Plaintiff or another victim will return their photographs and any publications made by the Defendants. *See Exhibit E.*

70. That Defendants Meta Platforms, Inc., Meta Platforms Technologies, Inc., Facebook Entertainment, LLC, Facebook Global Holdings I, LLC, Facebook Global Holdings I, Inc., Facebook Global Holdings II, LLC, Facebook Global Holdings III, LLC, Facebook Media Productions, LLC, Facebook Operations, LLC, Facebook Procurement, LLC, Facebook Ad Management, LLC, Facebook Holdings, LLC, Facebook International, LLC, Facebook Investor Group, LLC, Facebook, LLC, Facebook Media, LLC, Facebook Miami, Inc., Facebook Overseas, Inc., Facebook Property, LLC, Facebook Services, Inc., Facebook Shop, Inc., and Facebook Circularity, LLC (the "Meta Defendants") willfully and intentionally displayed and continue to display advertising materials for the purpose of commercial profit on pages displaying such defamatory content and/or intellectual property of Plaintiff without the consent or permission of Plaintiff.

71. That Defendant Paola Sanchez has continually reiterated to members of the private Facebook groups that members must "strongly consider the harm [they] might cause and don't screenshot or share anything outside of the group." The repetition of this statement is

demonstrative of Sanchez's, the individual Defendants', and AWDTSO, Inc. as a whole's knowledge of the illegality of publishing such defamatory statements and publishing the personally identifiable information of individual men within their platforms. The Defendants, by limiting access to the group to approved members and taking action against any member who provides notice to any victim of the publishing and dissemination of said defamatory statements or personally identifiable information, have demonstrated their intent and willingness to conspire to conceal their illegal activities in order to ensure the continued commercial profitability of their illegal enterprise. *See Exhibit F.*

COUNT ONE – DEFAMATION *PER SE*

72. Plaintiff incorporates and realleges all preceding paragraphs as if fully set forth herein.

73. Defendants continue to publish, intend to continue to publish, and cause to be published a series of repetitive false and defamatory statements of fact about Plaintiff in a manner that led and will continue to lead to the reasonably foreseeable publication and republication of those and similar statements.

74. The defamatory meanings of Defendants' false statements and implied statements of fact are apparent from the face of the publications, refer to Plaintiff by name, often are accompanied by images of Plaintiff, and/or are understood to be written about the Plaintiff.

75. The statements authored, published, and caused to be published by Defendants about Plaintiff are reasonably understood to state or imply that Plaintiff is dishonest, immoral and/or untrustworthy, or otherwise has a history of engaging in fraudulent activity.

76. Each of these statements and the implications stemming therefrom are false and defamatory *per se* in that said statements have damaged Plaintiff in his trade, office, or profession and in that they accuse the Plaintiff of having engaged in sexual misconduct.

77. Each of the statements published by Defendants are publicly available and was or will be viewed by thousands of potential individuals.

78. That Plaintiff is a private figure, but in any event each of these false statements were published with actual malice, *i.e.*, with knowledge of its falsity or with reckless disregard as to the truth. At a minimum, Defendants acted negligently in assessing or investigating the truth of the statements prior to publication. Defendants had no applicable privilege or legal authorization to make these false and defamatory statements.

79. Defendants acted with willful misconduct, malice, fraud, wantonness, oppression, and/or entire want of care which would raise the presumption of conscious indifference to consequences, and Defendants specifically intended to cause Plaintiff harm.

80. Defendants' statements have damaged and continue to damage Plaintiff's reputation in the general public, in their professions, in their church communities, in their neighborhood, and with friends, relatives, and neighbors.

81. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered and will continue to suffer significant general, actual, consequential, and special damages including, without limitation, impairment of reputation and standing in the community, personal humiliation, mental anguish and suffering, emotional distress, stress, anxiety, lost earnings, and other pecuniary loss. These harms are ongoing and, if Defendants are not prevented from continuing to repeat their defamatory statements about Plaintiff, those harms will continue.

COUNT TWO – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

82. Plaintiff incorporates and realleges all preceding paragraphs as if fully set forth herein.

83. Defendants' course of conduct directed specifically at Plaintiff was malicious, wanton, and intentional, and reflected a want of care which would raise the presumption of conscious indifference to consequences. That conduct includes the drawing of attention to Plaintiff, the encouragement of others to scrutinize and disbelieve Plaintiff, and similar.

84. Moreover, Defendants specifically intended to cause Plaintiff harm. Defendants' wrongful conduct is so outrageous in character and so extreme in degree that it is beyond all possible bounds of decency and is to be regarded as atrocious and utterly intolerable in a civilized community. Defendants' carried out their defamatory statements with actual malice, as they knew that the accusations they were making were false or otherwise published them with reckless disregard for the truth.

85. As a direct and proximate cause of Defendants' conduct, Plaintiff has suffered and will continue to suffer significant general, actual, consequential, and special damages including, without limitation, impairment of reputation and standing in the community, personal humiliation, mental anguish and suffering, emotional distress, stress, anxiety, lost earnings, and other pecuniary loss. These harms are ongoing and, if Defendants are not prevented from continuing to repeat their defamatory statements about Plaintiff, those harms will continue.

COUNT THREE – INVASION OF PRIVACY BY FALSE LIGHT; CIVIL CONSPIRACY

86. Plaintiff incorporates and realleges all preceding paragraphs as if fully set forth herein.

87. The defendants, as part of a campaign of harassment and abuse, broadcast numerous outrageous lies about the plaintiffs that represented such major misrepresentations of the plaintiffs' character, history, activities or beliefs that serious offense may reasonably be expected to be taken by a reasonable person in their position.

88. The false light in which the defendants' statements placed the plaintiffs would be highly offensive to a reasonable person.

89. The defendants had knowledge that their statements were lies, or acted with reckless disregard as to the falsity of their statements and the false light in which the plaintiffs would be placed.

90. These false publications have caused the plaintiffs actual and substantial damages.

91. In light of their prior experience with similar sorts of reckless and false statements, the defendants knew that their publications could cause the plaintiffs to suffer harassment and potential violence.

92. The plaintiff is a private individual and is neither a public official nor public figure.

93. The defendants broadcast their outrageous, cruel, and malicious lies about the plaintiff with knowledge that the statements were false or with reckless disregard as whether or not they were true.

94. The defendants combined to conduct their campaign of harassment and abuse, which included numerous unlawful acts or lawful acts by unlawful means.

95. The defendants combined to perform these unlawful acts pursuant to their scheme to harass and abuse the plaintiffs and in furtherance of that scheme.

96. These acts of the defendants resulted in damage to the plaintiffs.

COUNT FOUR – CIVIL LIABILITY FOR DOXXING (740 ILCS 195/15)

97. Plaintiff incorporates and realleges all preceding paragraphs as if fully set forth herein.

98. 740 ILCS 195/10(a) states, in pertinent part, that:

“An individual engages in the act of doxing when that individual intentionally publishes another person’s personally identifiable information without the consent of the person whose information is published and:

(1) the information is published with the intent that it be used to harm or harass the person whose information is published and with knowledge or reckless disregard that the person whose information is published would be reasonably likely to suffer death, bodily injury, or stalking; and

(2) the publishing of the information:

(i) causes the person whose information is published to suffer significant economic injury or emotional distress or to fear serious bodily injury or death of the person or a family or household member of the person; or

(ii) causes the person whose information is published to suffer a substantial life disruption; and

(3) the person whose information is published is identifiable from the published personally identifiable information itself.”

99. The Defendants, as part of a campaign of harassment and abuse, intentionally published the personally identifiable information of Plaintiff without his consent, namely his name and photograph to an online group dedicated to the harassment and belittlement of men with over 80,000 registered members.

100. That the Defendants published said information with knowledge and/or reckless disregard to the fact that the publishing of defamatory statements to an online platform of over 80,000 individuals would cause Plaintiff to be reasonably likely to suffer significant injury including risk of death, bodily injury, or stalking.

101. That as a direct and proximate cause of the Defendants actions, Plaintiff has suffered damages by way of significant emotional distress, disruption to his life, and fear of serious bodily injury at the hands of one of the group’s thousands of unidentified members.

COUNT FIVE – MISAPPROPRIATION (765 ILCS 1075/30)

102. Plaintiff incorporates and realleges all preceding paragraphs as if fully set forth herein.

103. That 765 ILCS 1075/30(a) states, in pertinent part, that:

“A person may not use an individual’s identify for commercial purposes during the individual’s lifetime without having obtained previous written consent from the appropriate person or persons specified in Section 20 of this Act or their authorized representative.”

104. The Defendants, as part of an ongoing campaign of harassment and abuse, intentionally published the Plaintiff's personal identity and likeness.

105. Upon information and belief, the Defendants published Plaintiff's identity for a commercial purpose, including the crowdsourcing of funds and collection of monetary proceeds from supporters of the "Are We Dating the Same Guy?" Community (*See Exhibits A and D*).

106. That Defendants did not seek to obtain permission from Plaintiff before publishing and profiting from his identity and likeness.

107. That Defendants have never had authorization from Plaintiff to publish his identity for any purpose, whether commercial or otherwise.

108. That as a direct and proximate cause of Defendants' conduct, Plaintiff has suffered and will continue to suffer significant general, actual, consequential, and special damages including, without limitation, impairment of reputation and standing in the community, personal humiliation, mental anguish and suffering, emotional distress, stress, anxiety, lost earnings, and other pecuniary loss. These harms are ongoing and, if Defendants are not prevented from continuing to repeat their defamatory statements about Plaintiff, those harms will continue.

COUNT SIX – UNJUST ENRICHMENT

109. Plaintiff incorporates and realleges all preceding paragraphs as if fully set forth herein.

110. Defendants unjustly received benefits in the form of payments from supporters, crowdfunding proceeds, and advertising revenue at Plaintiff's expense through their wrongful

conduct. Defendants continue to unjustly retain these benefits at Plaintiff's expense. It would be unjust for Defendants to retain any value they obtained as a result of their wrongful conduct.

111. Plaintiff is entitled to full restitution of all amounts by which Defendants have bene unjustly enriched at Plaintiff's expense.

COUNT SEVEN – PUBLIC DISCLOSURE OF PRIVATE FACTS

112. Plaintiff incorporates and realleges all preceding paragraphs as if fully set forth herein.

113. The Defendants, as part of an ongoing campaign of harassment and abuse, intentionally published the Plaintiff's personal identity and likeness in addition to private facts about the Plaintiff.

114. That the facts published by Defendant about Plaintiff would be highly offensive to a reasonable person and are of no legitimate concern to the public.

115. That as a direct and proximate cause of Defendants' conduct, Plaintiff has suffered and will continue to suffer significant general, actual, consequential, and special damages including, without limitation, impairment of reputation and standing in the community, personal humiliation, mental anguish and suffering, emotional distress, stress, anxiety, lost earnings, and other pecuniary loss. These harms are ongoing and, if Defendants are not prevented from continuing to repeat their defamatory statements about Plaintiff, those harms will continue.

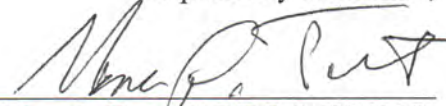
PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Honorable Court award Plaintiff:

- A. Injunctive relief enjoining Defendant from making or publishing, or causing to be made or published, any further statements repeating any and all false claims that Plaintiff engaged in any sort of immoral or illegal conduct of any kind;
- B. Compensatory damages, where appropriate;
- C. Punitive damages, where appropriate;
- D. The costs of this action, including attorney's fees; and
- E. Any such other and further relief this Court deems equitable and just.

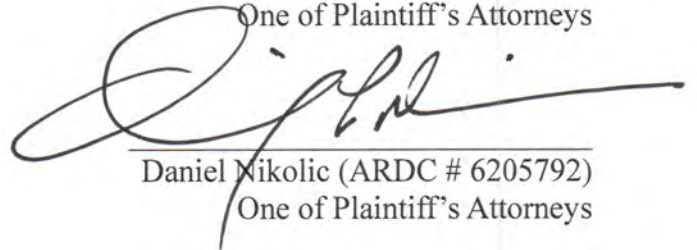
PLAINTIFF DEMANDS A TRIAL BY JURY.

Respectfully submitted,



Marc P. Trent (ARDC # 6324928)

One of Plaintiff's Attorneys



Daniel Nikolic (ARDC # 6205792)

One of Plaintiff's Attorneys

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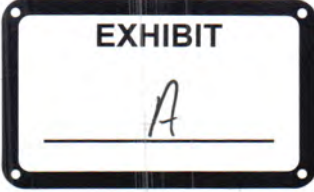
Search How it works Start a GoFundMe



Sign in

Share

Donate



1 to 6

Create A Safe Platform For AWDTSG

\$44,543 raised of \$50,000 goal • 1.7K donations

Share

Donate now

- Anonymous \$20 • 8 d
- Anonymous \$20 • 9 d
- Ishita Gupta \$25 • 25 d
- Mackenzie Miles \$10 • 26 d
- Tiffany Ranney \$20 • 26 d

See all

See top

Paola Sanchez is organizing this fundraiser.

I'm Paola Sanchez and I created and operate "AWDTSG" Red Flag Awareness groups all around the world where women can empower each other and keep each other safe from dangerous and/or toxic men.

I first started these groups to help solve some of the problems and dangers that me and my friends were experiencing with dating. We hit on a winning formula, and have grown by over 3.4 million members in just a year and a half, with over 600 moderators helping to run the groups. So we've stumbled onto something a lot of women are struggling with and are definitely onto something here... but this hasn't come without some struggles.

You may have noticed weird things going on with the groups these last few days. What happened was that 5 of our admin's accounts were abruptly deactivated all at once, including my 15 year old personal account. We've also had 4 of our groups suddenly shut down this week.. and none of those groups ever had community guideline violations.

With over 3,444,900 women in 212 groups we operate across the world, the sudden deactivation of all our admins has greatly disrupted our ability to keep them all safe. The worst part is the anxiety that comes with never knowing when or why our volunteers will suddenly be deactivated or a group will suddenly disappear.

These latest fiascos made me realize we need something better, and finally pushed me to start prioritizing my time towards building a new ideal platform for the lord's work we are doing here.. one with additional safety features such as screenshot logging, anonymous commenting, and much more.

I believe that the best way to keep women even safer is to create a platform where we can do everything we're doing in the groups, but with more specialized safety features and control over sharing.

But I realize that we need more resources to bring it into existence while continuing to operate and grow the current groups. I've started this GoFundMe to help raise as much of the development and operational costs as we can

I humbly ask you to please consider donating to support us in our efforts to help keep even more women safe

I guarantee that 100% of all money raised from this will go towards the design and development of an app or any necessary help in running the groups. I absolutely promise that 0% will go in my own pocket ❤️

I sincerely appreciate all of the support you've continued to give us! You ladies seriously mean the world to me! With your help we have a real opportunity to help dating get better for women everywhere

- Paola ❤️

P.S. To receive updates on development, please follow me on Instagram @hownowpaopao (<https://www.instagram.com/hownowpaopao/>) or enter your email on this simple web form I set up (<https://www.awdtsg.com/>). My instagram will be the main account to check for updates on the off chance more groups get deleted, so follow it for a place to regroup if you want to stay connected

P.P.S. If anyone has any friends or family at Facebook that they could put me in touch with to better understand things, please reach out to Dianne and let her know

P.P.P.S. We have looked into other existing platforms such as Discord and Reddit. It would be significantly more time consuming to determine that every member joining the group was for sure a real woman, and don't have the robust feature set we would want. It also still doesn't let us fine tune features to fit our specific safety concerns

2

P.P.P.P.S. I'm sorry that this isn't as detailed as I would have liked it to be, the deactivations all came so suddenly and I wasn't really planning on doing anything like this anytime soon.

P.P.P.P.S. Since first writing this, we have lost 6 groups totaling 251,800 members due to some overly restrictive FB moderation. I'm still fighting to try to get them back! But on a good note, within the last month alone their replacements have already reached 62,500 members but this further reinforces the fact that we need another platform.


EDIT! Here's some more information I was able to write out to address common questions:

I was hoping to announce this when it was further along and when I had written out something more informative that gave away more without giving too much, but this has pushed up the timeline in having to post it, as the group could potentially disappear at any moment without warning. I've been developing an app based off what I've learned in growing these groups. We've actually been able to find some great technical partners. It's not often that a concept gets validated and refined by a preexisting user base of millions of members, so that was very attractive in securing help.

If you're interested in giving a larger scale donation and having more details would be necessary for you to do so, please DM Dianne with the details around what you're thinking in terms of your investment, and in return I can happily provide you with more on the concept, as well as timetables, budgets, etc. It doesn't seem like a great idea to publicly release all of that information, as there's already competition in the market, and competing startups who may be able to use that information in their own plans. But I'm happy to share more in the right circumstances

I know this will take more than 50,000\$. Any dollar previously given was reinvested. Even if I said it was for a coffee, I really just used it to cover paying others, design and development costs, legal expenses and filings, etc. I also invested my own savings into this, and had a small family and friends round.

I have had offers from institutional investors, and will leverage them if need be. But I wanted to attempt this GoFundMe campaign as a way to not have to rely on investment capital so early, and be able to keep more of the company in the hands of women ❤️

 Add a Reaction to this GoFundMe

Updates (1)

April 28th, 2023 by Paola Sanchez, Organizer

Hey everyone! Some of you may have noticed already, but early last week I got my account back ❤️ It only took a letter to the CA Attorney General, tickets submitted by Meta employees who were in some of our groups, and over 2 weeks of stress to get it back

That being said, I'm still going to start putting more of my time towards developing our own app just in case shutdowns continue to happen!

Our current plan is to build it where it could function in a similar way to these groups should they ever get taken down, but also serve as an extension for these groups for as long as Facebook allows these groups to stay up essentially meaning that if you crosspost and link between the two, it provides a way to comment anonymously, prevent screenshots, and allow us better tracking on which users view content that later leaks. At least that's the current plan

3

Donate

Share



Organizer



Paola Sanchez

Organizer
Brooklyn, NY

Contact

Words of support (33)

Please donate to share words of support.



Kathy Rose

\$100 • 7 mos

Thank you for all the meaningful work that you do to help keep women safe! ❤️



Shamaly Valdez

\$10 • 9 mos

Thank you for having the safe space to share and look out for one another



Sara Ghattas

\$50 • 9 mos

Thank you for all that you do. It is a thankless job. As a woman who organizes events as part of her side hustle, I wish I had folks understand how important you are to our safety. Protect women!



Erin Cheever

\$50 • 9 mos

The truth about the sickness in online dating culture must come out.



Angela Teasenfitz

\$20 • 9 mos

You're doing God's work. Thank you!!!



Stella Guan

\$20 • 10 mos

Thank you so much for your effort, Paola. Please reach out if you need any design help with the new platform.



Nicole Eckert

\$20 • 10 mos

4

Although lost access when the big crash happened. You guys brought light to a situation and were a man wasted 5 years of my time. The women that commented shared and had also dealt with him were so supportive and we are all bonded. Doing the Lords... [Read more](#)



MANDY VERNIER

\$25 • 10 mos

Women supporting women to protect women. Thank you for developing a safe space for all of us trying to navigate the dating world. I'm sure your efforts have saved alot of women from pain and heartbreak.



Sarah Horrigan

\$25 • 10 mos

As a moderator... a separate platform would be life changing! Thank you for all you do Paola



Kellie May

\$20 • 10 mos



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Created March 15th, 2023 • [Community](#)

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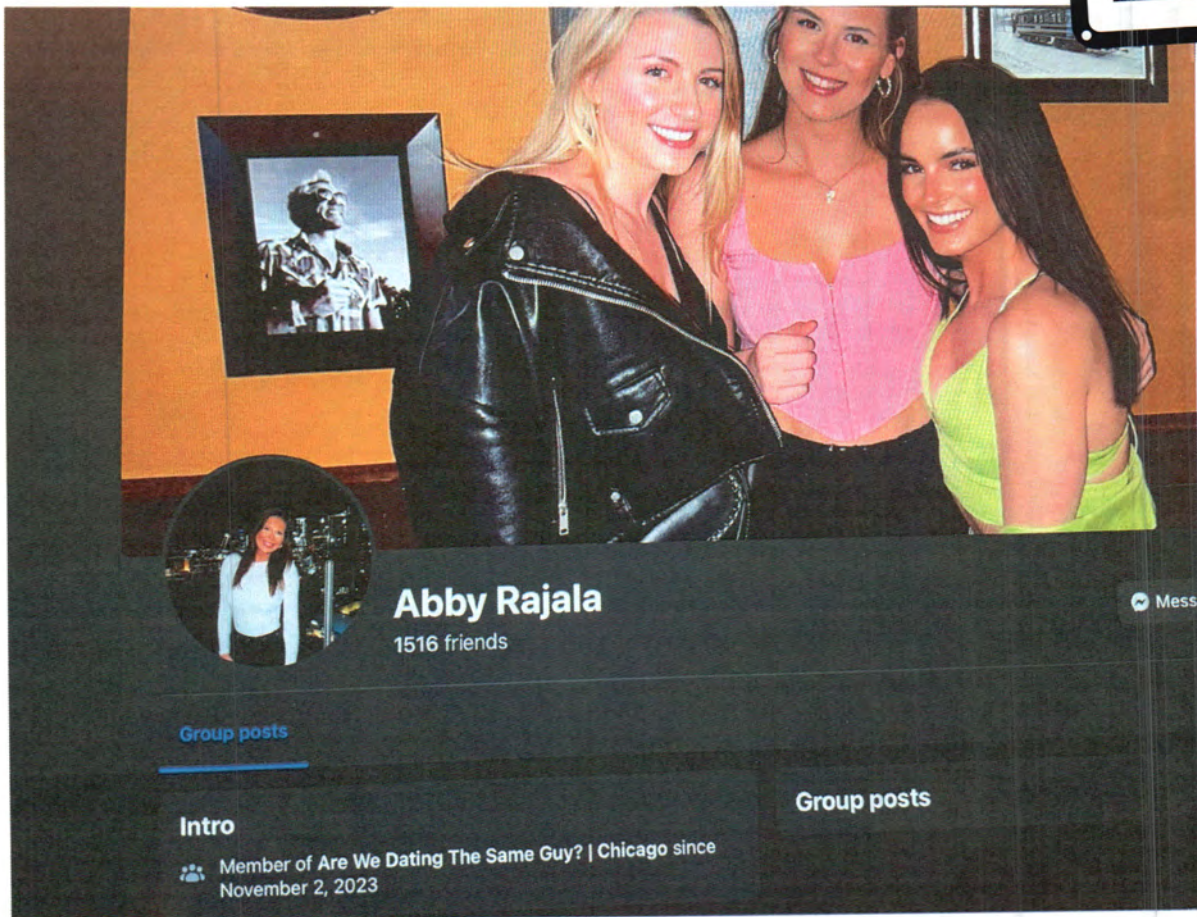
S

Nearby 

A

6 of 6

EXHIBIT
B



The image shows a screenshot of a Facebook profile for Abby Rajala. The profile picture is a circular image of a woman in a white top. The main cover photo shows three women smiling together; the woman on the left is wearing a black leather jacket, the woman in the middle is wearing a pink top, and the woman on the right is wearing a neon green top. The background of the cover photo is a wall with a framed picture of a man in a military-style uniform. Below the cover photo, the name "Abby Rajala" is displayed in white text, followed by "1516 friends" and a "Message" button. Below this, there are two sections: "Group posts" and "Intro". The "Intro" section contains a group icon and the text "Member of Are We Dating The Same Guy? | Chicago since November 2, 2023".

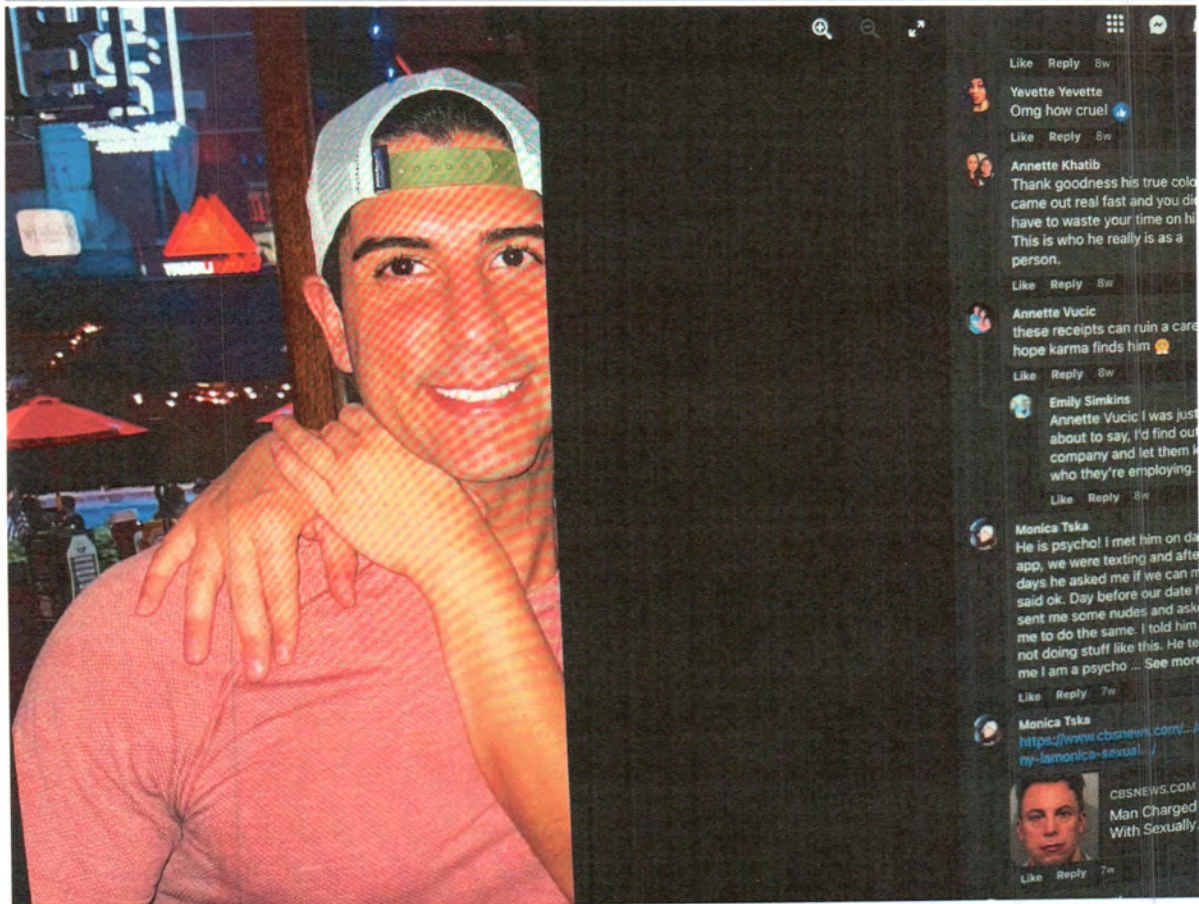
Abby Rajala
1516 friends

Group posts

Intro
Member of Are We Dating The Same Guy? | Chicago since November 2, 2023

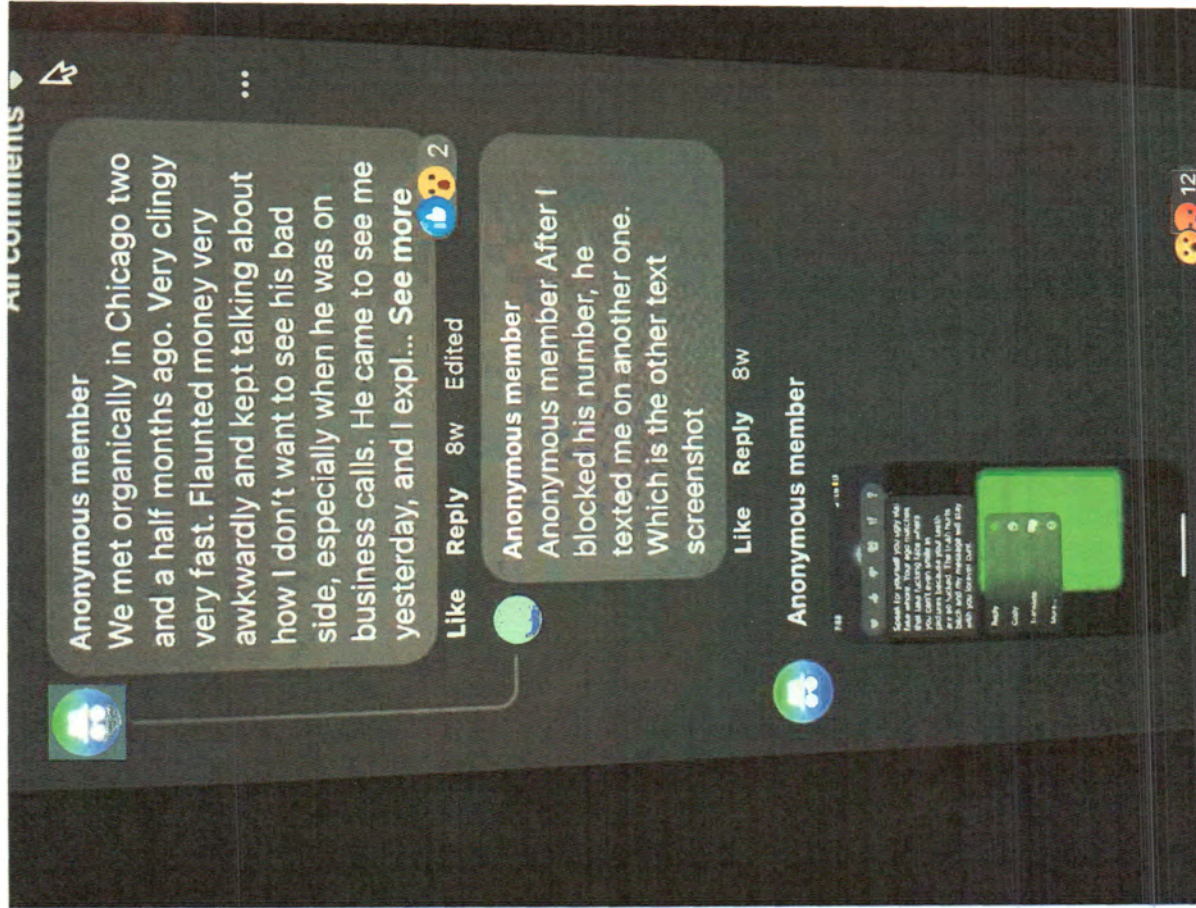
EXHIBIT
C

From: Justin Brown
To: [redacted]
Date: January 2, 2024 2:52:42 PM



1 TO 7


1 of 7




NIKKO, SZ 3

Like Comment Send


All comments ▾

 **Nicole Morisco**
I matched with him a month or so ago but convo never went anywhere

Like Reply 5d

 **Hannah Eve**
I went out with him a few times just over a year ago- he told me what I wanted to hear until I slept with him and then he ghosted... I'd steer clear.

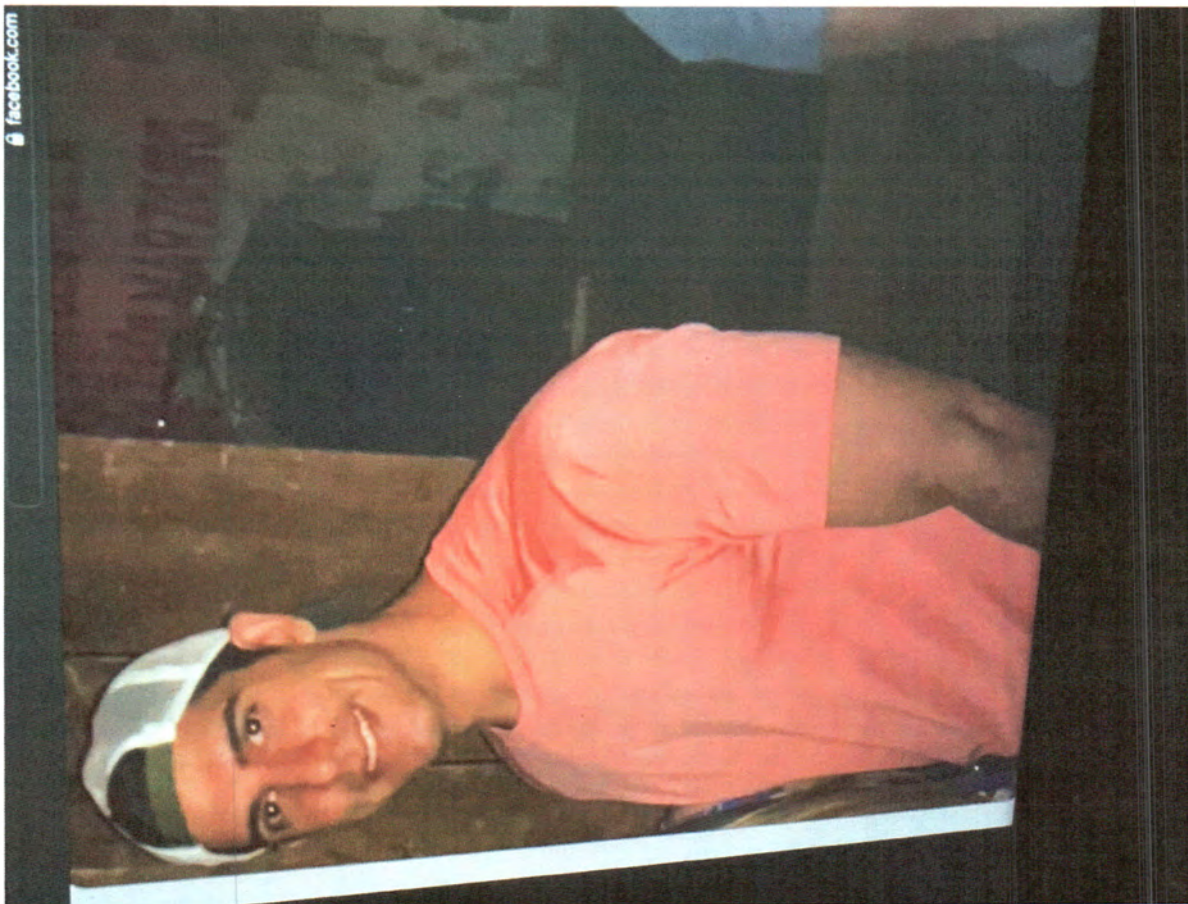
Like Reply 5d

 **Marnie Knouse**
▶▶▶ He's been posted here before. The poster said he sent her a slew of texts calling her names because she didn't want to spend the night with him. I just searched and this was on November 2nd so take a look!

Like Reply 5d




4






5

... 3




Anonymous member
December 27, 2023 at 11:48 AM · 🌐

Any  or ?
Nikko, 32

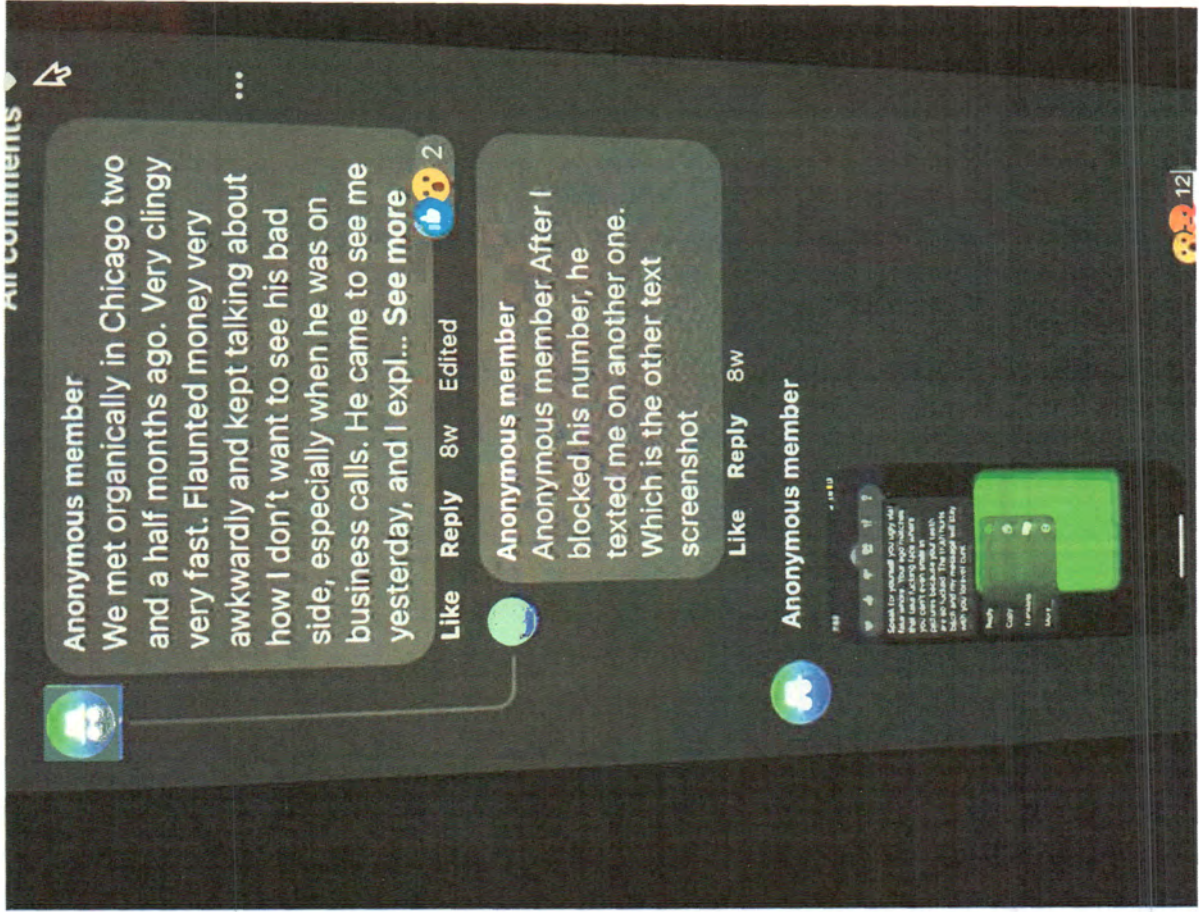
 Like  Comment  Send

Top comments

 **Nicole Morisco**
I matched with him a month or so ago but convo never went anywhere
Like Reply 5d

 **Marnie Knouse**
   He's been posted here before. The poster said he sent her a slew of texts calling her names because she didn't want to spend the night with him. I just searched and this was on November 2nd so take a look!
Like Reply 5d

6



7/10



Find a creator

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Paola Sanchez

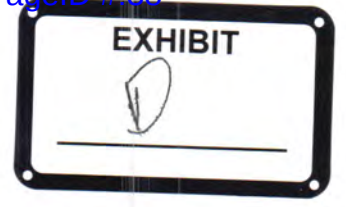
Creating safe & empowering communities for women to thrive in.

54 members • 158 posts • \$146.8/month

Join for free



Home About



1-2



Log in



Sip of SafeTea

\$5 / month

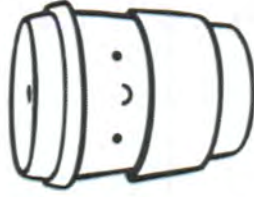
Skip navigation [Join](#)

This tier level is perfect for those who want to show a little more support and want to stay updated on the development and growth of safe spaces for women.

- General Support



YOU MIGHT LIKE



Cup of SafeTea

\$10 / month

[Join](#)

This is the tier level for those who want to show their support while also getting a behind the scenes look at the day to day operations of the current Red Flag Awareness groups as well as the development of our safetea dating app 🥰
This tier includes: -beta app participation after one donation ever (once available) - interesting insights in running the groups as well as our development process -lists of worldwide group growth over time, mockups of apps and features, etc.

- Early access
- Behind-the-scenes content
- Work-in-progress updates (digital)



Pot of SafeTea

\$25 / month

[Join](#)

This is the tier level for those who strongly believe in the cause and might be interested in having a direct influence on the decision making process and have input in the development of our safetea dating app as well as the direction of the current groups ❤️ p.s. omg I love you 🥰
This tier includes: -beta app participation after one donation ever (once available) - interesting insights in running the groups as well as our development process -lists of worldwide group growth over time, mockups of apps and features, etc. - exclusive polls when making tough decisions on names, direction, etc. -a private community where we can further



Search Results

in Are We Dating The Same Guy? | Chicago

Nikko D'Ambrosio

Filters

Posts You've Seen

Most Recent

Posted by

Tagged Location

Date Posted

Handwritten scribbles: a checkmark, a house icon, and a vertical line.



Anonymous member
December 28, 2023 at 11:31 AM · 🌐

Hi! any tea on Nick? Seems sweet and thinking of meeting up. Just want to check for any red flags or anything before meeting in person since its my first time meeting someone from online. Thanks ladies 🙏

3 comments



Anonymous member
December 27, 2023 at 11:48 AM · 🌐

Any or ?
Nikko, 32

...

Handwritten scribbles: a checkmark, a house icon, and a vertical line.



Search Results

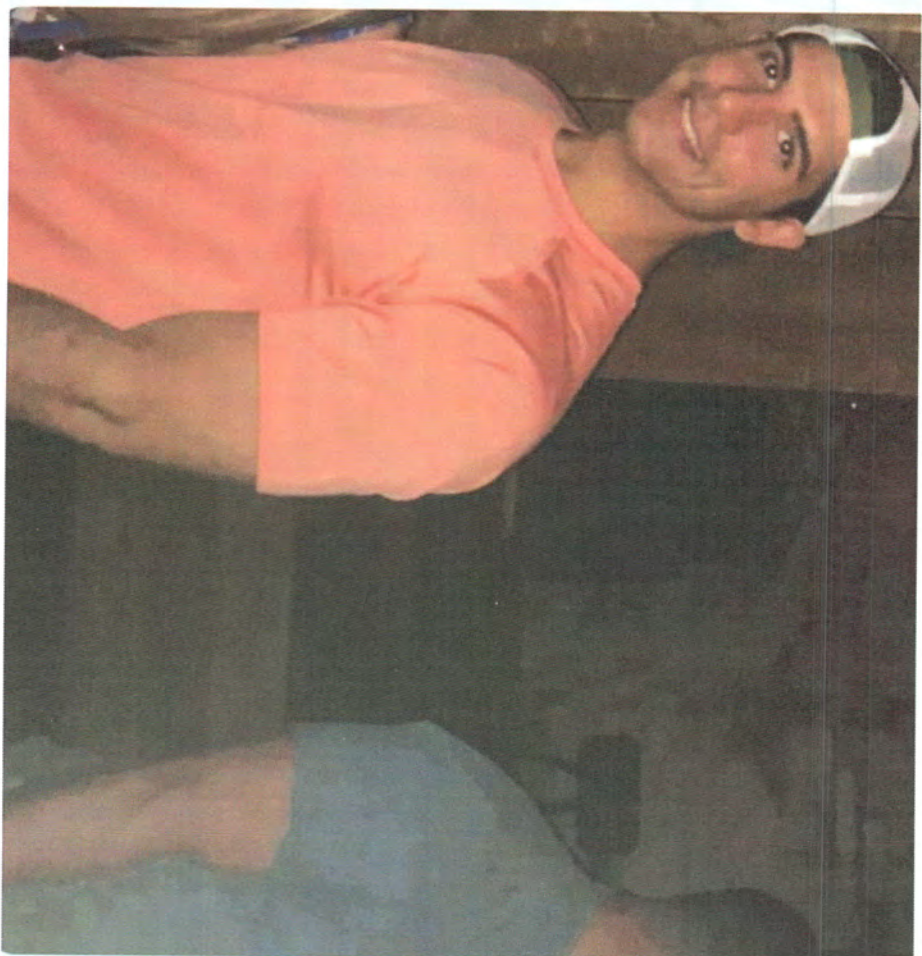
in Are We Dating The Same Guy? | Chicago

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3 comments

Like

Comment

Send



Anonymous member
December 3, 2023



Nick details/pics in comments once approved.

7

3 comments



Search Results

In Are We Dating The Same Guy? | Chicago

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Comment

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Anonymous member
November 6, 2023 · 🌐

Any 🍷 or 🚩 on Nick / Nicolas / Nicholas?

👍 2

1 comment

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Anonymous member
November 2, 2023 · 🌐

Any 🍷 on Nikko 32?

Date Posted



3



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In Are We Dating The Same Guy? | Chicago

2:40



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4



Search Results

😬 1

3 comments



in Are We Dating The Same Guy? | Chicago

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Date Posted



F



Are We Dating The Same Guy? | Chicago



Paola Sanchez

Moderator · October 21, 2022 · 🌐

We've been getting more reports of screenshots leaving the group and things getting back to some of the guys that were posted, so I'm dedicating a week of pinned posts to go over **the harm** this can cause, how to protect yourself, and what to do if it happens.

I can not emphasize enough how important it is for you to not screenshot or share anything you see in here.

You may be friends with a guy and think that the words posted about him can't possibly be true, but I'm telling you right now to please trust me when I say that some men act differently with women in the dating scene and that can include violent encounters and behavior that they don't exhibit in front of friends and colleagues. Letting your friend know he was shared here compromises the safety of every girl that spoke up.

You may have just found your boyfriend on here and feel the need to confront him about it. Don't let your emotions cloud your judgement. Take the time to think of another place where you heard the information and don't ever let him know that he was posted in any sort of group. That slip up could lead him back here to harass girls in an effort to destroy the evidence.

You may think you're just innocently sharing something funny, but then that person sends it to someone who knows someone and soon after the guy is coming after the girl who thought she could post safely here. Just put yourself in her shoes for one second and think about how scared she must feel.

We have a rigorous vetting process and have been working extremely hard to keep out any fake profiles and Trojan horses. And honestly I think we've gotten it down really good! Just to give you one example of the things we're dealing with: One man who was posted about in the group created two fake profiles (having stolen his profile pics from a girl on Instagram) in an attempt to get in. We caught and blocked both of them, at which point he messaged every moderator of the page threatening legal action in an attempt to get the post taken down.

We're working our absolute hardest to keep this group as safe as humanly possible, but it's all for nothing if girls are leaking info out of the group anyways.

So please, strongly consider **the harm** you might cause and don't screenshot or share anything outside of the group. We want to keep this as safe of a space as we possibly can.

And, as always, thank you from the bottom of my heart to the vast majority of you who are doing nothing wrong except existing in here and supporting each other 🙏🙏🙏

👍❤️👩🏻 303

23 comments