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Los Angeles County Superior Court

NOV 14 2012

John A. Clarke, Executive Officer/Clerk

By _____, Deputy
O. Chaparyan

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In Pro Se Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – NORTH VALLEY DISTRICT**

PC054065

Keith Gilabert,

Plaintiff,

vs.

Ann C. Logue, Ann Logue.com, Aaron Krowne,
Anita Bartholomew,
Hf-implode.com, hfimplode.com,
hedgefundimplode.com,
hedgefundimplosion.com, implode-explode.com,
ml-implode, blog.ml-implode.com, builder-
implode.com

And Does 1-50, inclusive,
Defendants.

) Case No.:

) **COMPLAINT FOR DAMAGES**
) **(LIBEL)**

) **JURY TRIAL DEMANDED**

) **Date:**

) **TIME:**

) **DEPT:**

TO THE COURT AND DEFENDANT AND COUNSEL OF RECORD:

Plaintiff Keith Gilabert ("Gilabert"), for his Complaint against Defendants Ann C. Logue, Aaron Krowne,
Anita Bartholomew, Hf-implode.com, hfimplode.com, hedgefundimplode.com,
hedgefundimplosion.com, implode-explode.com, ml-implode, blog.ml-implode.com, builder-
implode.com; and Does 1-50, states as follows:

1
2 1. Plaintiff Gilabert is an individual who resides and does business in Los Angeles County,
3 California.

4 2. Defendant Ann C. Logue ("Logue") is, upon information and belief, a blogger that
5 contributes articles on finance to the website www.annlogue.com, Hf-implode.com, hfimplode.com,
6 hedgefundimplode.com, hedgefundimplosion.com, implode-explode. com, ml-implode, blog.ml-
7 implode.com, and builder-implode.com.

8 3. Defendant Aaron Krowne ("Krowne") is, upon information and belief, a blogger that
9 contributes articles on finance to the website www.annlogue.com, Hf-implode.com, hfimplode.com,
10 hedgefundimplode.com, hedgefundimplosion.com, implode-explode. com, ml-implode, blog.ml-
11 implode.com, and builder-implode.com.

12 4. Defendant HF-IMplode. COM is, upon information and belief, a business entity, form
13 unknown.

14 5. Defendant HFIMplode. COM is, upon information and belief, a business entity, form
15 unknown.

16 6. Defendant HEDGEFUNDIMplode. COM is, upon information and belief, a business entity,
17 form unknown.

18 7. Defendant HEDGEFUNDIMPLOSION.COM is, upon information and belief, a business entity,
19 form unknown.

20 8. Defendant IMplode-EXPLODE. COM is, upon information and belief, a business entity, form
21 unknown.

22 9. Defendant ML-IMplode. COM is, upon information and belief, a business entity, form
23 unknown.

24 10. Defendant BLOG.ML-IMplode. COM is, upon information and belief, a business entity, form
25 unknown.

26 11. Defendant BUILDER-IMplode. COM is, upon information and belief, a business entity, form
27 unknown.

28 12. Defendant Anita Bartholomew ("Bartholomew") is, upon information and belief, a blogger

1 that contributes comments to the website www.annlogue.com.

2 13. The true names of defendants DOES 1 through 50, inclusive are unknown to Plaintiff, who
3 therefore sues each defendants by fictitious names. Plaintiff is informed and believes, and based on
4 that information and belief alleges, that each of the defendants designated as a DOE is legally
5 responsible for the events and happenings referred to in this complaint, and unlawfully caused the
6 injuries and damages to Plaintiff alleged in this complaint.

7 14. Jurisdiction and venue are proper in this Court in that Plaintiff resides in and has suffered
8 injury in California as a result of Defendants' tortuous act of publishing defamatory statements about
9 Plaintiff on the internet, which was published to millions of people in the United States including
10 persons in the State of California.

11 15. On or about November 14, 2011 Plaintiff notified Defendant Aaron Krowne that a posting
12 on his website was false and misleading. Plaintiff sent a courtesy notice to Defendant Krowne who
13 then responded with an email stating, "things will only get much for you."

14 16. Defendant Krowne published a false story on Plaintiff Gilabert stating that "Gilabert, is
15 embarking on a "sweep and clean" to expunge any record of criticism from the internet....in our
16 experience, this kind of "sue to silence" behavior is 100% correlated with guilt-and additionally, is
17 usually intended to cover up even greater wrongdoing than gas been included in government and/or
18 private settlements/proceedings."

19 17. On or about November 18, 2011 Defendant Ann Logue published a false and misleading
20 article stating that Plaintiff Gilabert:

- 21 1. Raised \$14.1 million from investors.
- 22 2. Received commission kickbacks from a broker.
- 23 3. Charged management fees on phony profits.
- 24 4. Mass marketed the fund.
- 25 5. Claimed the fund had performance dating back to 1997.
- 26 6. Ann Logue published these false and misleading comments knowingly.

27 18. On or about December 1, 2011 Defendant Aaron Krowne posted that he was being harassed
28 by Plaintiff Gilabert and began raising money through lies from the public using Plaintiff Gilabert as a

1 villain. In reality Defendant Krowne was warned by Google and his own web host that he was violating
2 the terms of use. Defendant Krowne's own ignorance is not the responsibility of Plaintiff Gilabert.

3 19. On or about May 1, 2012 Anita Bartholomew posted a comment on annlogue.com calling
4 Plaintiff a "scammer" without any regard to the facts.

5 20. Defendants knew that the statements about Gilabert described above were false and/or
6 Recklessly disregarded the falsity of these statements when they published them.

7 Defendants published these statements with actual malice and with the intent to cause harm to
8 Gilabert.

9 21. The statements about Gilabert are libelous on their face. They accuse Gilabert of acts that
10 never took place.

11 22. The statements about Gilabert adversely affect Gilabert in his professional life and has been
12 damaged by their publication.

13 23. The Defendants are liable to Plaintiff as a result of these false and defamatory statements
14 for actual, presumed and punitive damages in an amount to be determined at trial, but not less than
15 \$10,000,000.00.

16
17 WHEREFORE, Plaintiff Keith Gilabert requests this Court:

18 A. For judgment against Defendants in an amount to be determined at trial, but not less than
19 \$10,000,000.00 .

20 B. For interest, costs and such other relief as my be just and proper.
21
22

23 Dated: November 14, 2012

24 Respectfully submitted,

25
26 

27 Keith Gilabert, Pro Se
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