

Supreme Court of Pennsylvania

Court of Common Pleas Civil Cover Sheet

Delaware

County

For Prothonotary Use Only:

Docket No:

CV-24-00908B

TIME STAMP

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A
Commencement of Action:

Complaint Writ of Summons
 Transfer from Another Jurisdiction

Petition
 Declaration of Taking

JUDICIAL
COURT
DEPARTMENT
SUPREME
COURT
PA.
18
PM

Lead Plaintiff's Name:

ATNIGHT MEDIA LLC

Lead Defendant's Name:

STEPHANIE JO TRUDE A/K/A "BBQ LADY"

Are money damages requested? Yes No

Dollar Amount Requested: within arbitration limits
(check one) outside arbitration limits

Is this a *Class Action Suit*? Yes No

Is this an *MDJ Appeal*? Yes No

Name of Plaintiff/Appellant's Attorney: JOSEPH P. LESNIAK, Esq., ID: 91341

Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

Intentional
 Malicious Prosecution
 Motor Vehicle
 Nuisance
 Premises Liability
 Product Liability (*does not include mass tort*)
 Slander/Libel/ Defamation
 Other:

CONTRACT (do not include Judgments)

Buyer Plaintiff
 Debt Collection: Credit Card
 Debt Collection: Other

 Employment Dispute:
Discrimination
 Employment Dispute: Other

 Other:

CIVIL APPEALS

Administrative Agencies
 Board of Assessment
 Board of Elections
 Dept. of Transportation
 Statutory Appeal: Other

MASS TORT

Asbestos
 Tobacco
 Toxic Tort - DES
 Toxic Tort - Implant
 Toxic Waste
 Other:

REAL PROPERTY

Ejectment
 Eminent Domain/Condemnation
 Ground Rent
 Landlord/Tenant Dispute
 Mortgage Foreclosure: Residential
 Mortgage Foreclosure: Commercial
 Partition
 Quiet Title
 Other:

MISCELLANEOUS

Common Law/Statutory Arbitration
 Declaratory Judgment
 Mandamus
 Non-Domestic Relations
Restraining Order
 Quo Warranto
 Replevin
 Other:
COMPLAINT IN EQUITY

PROFESSIONAL LIABILITY

Dental
 Legal
 Medical
 Other Professional:

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA

ATNIGHT MEDIA LLC, DUANE
"DOG" CHAPMAN, SETH ROGERS,
TONY L. MATHIS, ANDRA GRIFFIN,
BRITTNEY NICOLE JACKSON,
CHRISTINA O'DONNELL, JULIA
VALENTI, HONG XIE, and NIK "THE
HAT" HATZIEFSTATHIOU

Plaintiffs

v.

NO. CV-24-009083

STEPHANIE JO TRUDE, AND
JESSICA LYNN SENG

Defendants

NOTICE TO DEFEND - CIVIL

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF
YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET
FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION
ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A
LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH
INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES
TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

LAWYERS REFERRAL SERVICE
FRONT AND LEMON STREETS
MEDIA, PA 19063
610-566-6625

AVISO

USTED HA SIDO DEMANDADO/A EN CORTE. Si usted desea defenderse de las demandas que se presentan más adelante en las siguientes páginas, debe tomar acción dentro de los próximos veinte (20) días después de la notificación de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aquí en contra suya. Se le advierte de que si usted falla de tomar acción como se describe anteriormente, el caso puede proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier otra reclamación o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin más aviso adicional. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUIENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO. SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSTO A PERSONAS QUE CUALIFICAN.

LAWYER REFERRAL SERVICE
FRONT AND LEMON STREETS
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610-566-6625

LAW OFFICES OF JOSEPH LESNIAK LLC

JOSEPH P. LESNIAK, ESQUIRE
Counsel for Plaintiffs
334 West Front Street
Media, PA 19063
Phone: (484) 444-2348

Dated: October 18, 2024

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ATNIGHT MEDIA LLC, DUANE
“DOG” CHAPMAN, ROGERS,
TONY L. MATHIS, ANDRA
GRIFFIN, BRITTNEY NICOLE
JACKSON, CHRISTINA
O’DONNELL, JULIA VALENTI,
HONG XIE, and NIK “THE HAT”
HATZIEFSTATHIOU,

IN THE COURT OF COMMON PLEAS
OF DELAWARE COUNTY,
PENNSYLVANIA

Plaintiffs.

v.

STEPHANIE JO TRUDE,
JESSICA LYNNE SENG, and
DOES 1 through 50, inclusive,

Defendants.

No. CV-24-9083

2024 OCT 18 PM 1:13
OFFICE OF JUDICIAL SUPPORT
DELAWARE CO., PA.

COMPLAINT FOR INJUNCTIVE AND OTHER EQUITABLE RELIEF

I. THE PARTIES

1. Plaintiff AtNight Media LLC is a Pennsylvania limited liability company with its principal place of business at 1 World Trade Center, Floor 85, New York, New York, and is in the process of relocating.

2. Plaintiff Duane "Dog" Chapman is an individual in his professional capacity as a bounty hunter and public figure with an address at 1083 North Collier Blvd, Suite 311, Marco Island, Florida 34145.

3. Plaintiff Seth Rogers ("Mr. Rogers") is an individual residing at 289 Executive Avenue, Apt A, Clarksville, Tennessee 37042. Mr. Rogers is the father of Sebastian Rogers.

4. Plaintiff Tony L. Mathis is an individual in his official capacity as National Spokesperson for Mr. Rogers, residing at 60341 E 322 Road, Grove, Oklahoma 74344.

5. Plaintiff Hong Xie is an individual in his official capacity as an officer of AtNight Media LLC, residing at 2151 Bodine Road, Malvern, Pennsylvania.

6. Plaintiff Andra Griffin is an individual residing at 5822 2nd St W, Bradenton, Florida 34207.

7. Brittany Nicole Jackson is an individual residing at 17141 Saint Johns Church Road, Laurel Hill, North Carolina 28351.

8. Plaintiff Christina O'Donnell is an individual residing at 99801 Haldeman Avenue, Apartment D202, Philadelphia, Pennsylvania 19115.

9. Plaintiff Julia Valenti is an individual residing at 433 Eagleview Drive, Mohrsville, Pennsylvania 19541.

10. Plaintiff Nikolaos Hatziefstathiou is an individual in his official capacity as an employee or agent of AtNight Media LLC, residing at 712 Cedar Grove Road, Broomall, Pennsylvania 19008.

11. Defendant Stephanie Jo Trude is an individual residing at 827 Bedford Street, Claysburg, Pennsylvania 16625.

12. Defendant Jessica Lynne Seng is an individual residing at 548 Tasker Ave, Norwood, Pennsylvania 19074.

II. FACTS

A. BACKGROUND

13. Plaintiffs are engaged in the urgent and sensitive task of locating Sebastian Wayne Drake Rogers, a 15-year-old missing child, last seen on February 25, 2024, in Hendersonville, Tennessee. Despite extensive efforts, Sebastian remains missing, necessitating a coordinated and uninterrupted search.

14. The search for Sebastian Rogers has proven far more difficult than a typical missing teenager investigation, as a few ill-intentioned individuals have sought to cast Mr. Rogers as a villain.

15. Meanwhile, others have conducted "Salem Witch Trial"-like panels aimed at intimidating potential witnesses or discouraging those who may have useful information from coming forward.

16. Some of these individuals, uncomfortably close to Mr. Rogers, include his ex-wife Kate Proudfoot and her husband, Christopher Proudfoot. Others are so-called "content creators," whose sole aim seems to be inviting, inciting, instructing, and destroying the lives of anyone who dares to search for answers or help locate the missing teenager.

17. As set forth below, Defendants have engaged in reckless and unlawful actions, including the dissemination of false information, harassment, threats, and interference, which have severely disrupted the search operations. Defendants' actions have caused significant harm, diverted critical resources, and impeded Plaintiffs' lawful efforts to locate Sebastian.

B. TIMELINE

18. Sebastian Wayne Drake Rogers, 15, was last seen with his biological mother, Kate Proudfoot, at Texas Roadhouse in Hendersonville, Tennessee, on February 25, 2024. A true and correct copy of the Tennessee Bureau of Investigation's official updates page is attached hereto as **Exhibit 1**, which outlines the latest information about this case to date and is incorporated by reference herein.

19. After leaving the restaurant, Sebastian disappeared, effectively vanishing without a trace. He was reported missing the next morning, prompting a multi-state search involving local, state, and federal law enforcement. *Id.*

20. On March 21, 2024, Mr. Rogers organized a search of the Natchez Trace State Park, located 100 miles from Sumner County, after receiving a tip suggesting the family search that area. Unfortunately, nothing was found. A true and correct copy of the news article is attached hereto as **Exhibit 2** and incorporated by reference herein.

21. On March 23, Mr. Rogers felt a glimmer of hope when the United Cajun Navy deployed a team to assist in the search for the missing teenager. A true and correct copy of the news article is attached hereto as **Exhibit 3** and incorporated by reference herein.

22. However, as the days went on and the situation grew more challenging, Mr. Rogers made a public plea for help, reporting that threats, intimidation, and other questionable tactics were being used to disrupt the search efforts. A true and correct copy of the news article is attached hereto as **Exhibit 4** and incorporated by reference herein.

23. The nightmare worsened on March 29, when the United Cajun Navy withdrew from the search, citing death threats and interference from "a handful of mentally ill people with too much free time, emboldened by online keyboard warriors." A true and correct copy of the news article is attached hereto as Exhibit 5 and incorporated by reference herein.

24. On April 2, 2024, Tennessee Bureau of Investigation spokesperson Susan Niland cautioned the public during a press conference that misinformation could damage the investigation into Sebastian Rogers' disappearance. A true and correct copy of the news article is attached hereto as Exhibit 6 and incorporated by reference herein.

25. On April 16, 2024, 50 days after Sebastian Rogers' disappearance, Mr. Rogers initiated a petition on Change.org, calling for a criminal investigation by the FBI. A true and correct copy of the Change.org page, which as of today has garnered 19,472 signatures, is attached hereto as Exhibit 7 and incorporated by reference herein. The petition reads:

"We want the FBI to take over the investigation of the case of missing Sebastian Wayne Drake Rogers from the Sumner County Sheriff's Office. It has been 50 days since Sebastian has gone missing, no scent trail from dogs, no video footage of Sebastian leaving his mother's house. Yet no criminal investigation at all by TBI or the Sumner County Sheriff's Office."

26. On or about April 17, 2024, Mr. Rogers hired two licensed investigators, Chloe L. Schafer and Heather Cohen, to assist with the search. Unbeknownst to him at the time, at least one of them had connections to the

Enterprise. A true and correct copy of the news report is attached hereto as **Exhibit 8** and incorporated by reference herein.

27. On or about April 23, 2024, Mr. Rogers retained a private investigator to assist in the search for his missing son, Sebastian Rogers. A true and correct copy of a news article is attached hereto as **Exhibit 9** and incorporated by reference herein.

28. Around that time, Mr. Rogers began a relationship with Michaela Cleveland, a/k/a Michaela Allardice, who, based on information and belief, was sent to Mr. Rogers with the ulterior motive of using sex as a manipulation tool, similar to tactics employed by intelligence agents but without any legal authority. During the course of the relationship, she covertly emailed herself confidential files related to Sebastian Rogers. A true and correct copy of the Sworn Declaration of Seth Rogers, father of Sebastian Wayne Drake Rogers, is attached hereto as **Exhibit 10** and incorporated by reference herein. See Exhibit 10 at ¶ 6-7.

29. On May 1, 2024, Mr. Rogers retained Tony L. Mathis on a *pro bono* basis to assist with media requests, allowing him the space to mourn and continue searching for his son, Sebastian Rogers, with peace of mind. A true and correct copy of the Sworn Declaration of Tony L. Mathis is attached hereto as **Exhibit 11** and incorporated by reference herein.

30. On May 20, 2024, as the search for missing teen Sebastian Rogers approached the three-month mark, his father, Mr. Rogers, called for renewed efforts and urged the FBI to take over the investigation, seeking a fresh perspective on his son's case. A true and correct copy of the article titled "Sebastian Rogers' Father

Calls on FBI to Take Over Investigation" is attached hereto as **Exhibit 12** and incorporated by reference herein.

31. On May 27, 2024, Mr. Rogers planned three additional searches to further the effort to locate his son. A true and correct copy of the news report is attached hereto as **Exhibit 13** and incorporated by reference herein.

32. In an emotional interview on June 19, 2024, with NewsNation's Ashleigh Banfield, Mr. Rogers stated, "There has been no contact between me and the Proudfoots. It's like I'm the only one that misses my son." A true and correct copy of this interview is attached hereto as **Exhibit 14** and incorporated by reference herein.

33. On July 11, WKRN Nashville reported on a search being conducted by Mr. Rogers, during which he stated that "he is not sharing a lot about the search due to worry over continued harassment." A true and correct copy of this report is attached hereto as **Exhibit 15** and incorporated by reference herein.

34. On or around August 7, Kate and Christopher Proudfoot pursued legal action by filing a protective order against Plaintiff Griffin. A true and correct copy of this filing is attached hereto as **Exhibit 16** and incorporated by reference herein.¹

35. On August 21, 2024, AtNight was engaged by a private client of the Plaintiff with an address in Brentwood, Tennessee, to assist in the search for Sebastian Rogers.

¹ Following Sebastian's disappearance on February 26, 2024, his mother, Katie Proudfoot, and stepfather, Chris Proudfoot, have largely avoided public attention. Despite their low profile, Katie later alleged that she was being subjected to stalking and harassment.

36. On August 26, 2024, the FBI announced a \$50,000 reward for information on Sebastian Rogers. A true and correct copy of the FBI Missing Persons poster for Sebastian Wayne Drake Rogers, which showcases a \$50,000 reward and indicates he is classified as a runaway, suggesting he is alive and not deceased, is attached hereto as Exhibit 17 and incorporated by reference herein.

37. A true and correct copy of the original post from "Nik the Hat" on X (formerly Twitter), dated September 2, 2024, announcing the Agency's intent to cover the case of Sebastian Wayne Drake Rogers, is attached hereto as Exhibit 18 and incorporated by reference herein.²

38. On September 3, 2024, at approximately 11:17 a.m., Mr. Hatziefstathiou e-mailed Special Agent Bobby Simmons of the Tennessee Bureau of Investigation to begin coordination efforts involving Dog the Bounty Hunter, AtNight, and Mr. Rogers' interests in assisting with the search for Sebastian Rogers. A true and correct copy of this correspondence is attached hereto as Exhibit 19 and incorporated by reference herein.

39. That same day, AtNight entered into a letter of engagement with Mr. Rogers, the father of Sebastian Wayne Drake Rogers. A true and correct copy of the engagement letter is attached hereto as Exhibit 20 and incorporated by reference herein.

40. AtNight intended to represent the entire family by reaching out to Kate and Christopher Proudfoot, as well as Mr. Rogers. However, Mr. and Mrs. Proudfoot declined the services offered by AtNight. *Id.*

² Hatziefstathiou is on medical leave per the University of Pennsylvania Medical Center but was acting in his official capacity.

41. On September 4, 2024, Plaintiffs bolstered the FBI reward with an additional \$50,000, raising the total to \$100,000. A true and correct copy of the Press Release from AtNight and One World Corp. is attached hereto as Exhibit 21 and incorporated by reference herein.

42. At 3:31 p.m. that same day, Plaintiff Duane "Dog the Bounty Hunter" Chapman announced the increased reward on his social media platforms, capturing nationwide attention. A true and correct copy of the article from TMZ announcing Dog's involvement is attached hereto as Exhibit 22 and incorporated by reference herein.

43. On or about September 5, 2024, Plaintiff Duane "Dog the Bounty Hunter" Chapman, joined by Plaintiffs Mr. Rogers and Tony Mathis, appeared on NewsNation with Ashleigh Banfield, declaring their belief that Sebastian was alive and would be found. A true and correct copy of the NewsNation article is attached hereto as Exhibit 23 and incorporated by reference herein.

44. On September 10, 2024, AtNight e-mailed the United States Department of Justice IOD/SOIB Missing Child Unit to inquire about Form USM641, which activates the assistance of the United States Marshals Service. A true and correct copy of this correspondence is attached hereto as Exhibit 24 and incorporated by reference herein.

45. Within the hour, Katie Accame, Resource Director for the United States Marshals Service in Washington, D.C., provided the form to AtNight, which was later sent to Agent Simmons at the TBI. *Id.*

46. On September 10, 2024, Plaintiff Griffin appeared in court for allegedly violating a protective order issued by the Proudfoots, citing #ChrisProudfoot and

accusing her of being a nuisance to their privacy. A true and correct copy of the relevant documentation is attached hereto as Exhibit 25 and incorporated by reference herein

47. On September 16, 2024, Defendant Stephanie Jo Defendant Trude received a cease and desist letter addressing her defamatory conduct, which included numerous violations of federal law and related criminal behavior. A true and correct copy of this letter is attached hereto as Exhibit 26 and incorporated by reference herein.

48. On September 17, 2024, Judy Coleman, Esquire, a/k/a "Judy the Lawyer" on TikTok, responded to the Cease and Desist Demand on behalf of Defendant Trude, stating, "At no time has her conduct extended to active interference in any legal or investigatory process. The demand that she ceases protected speech, under guise of obstruction allegations, is unfounded and without legal merit." A true and correct copy of this response is attached hereto as Exhibit 27 (See Page 1, ¶1) and incorporated by reference herein.

49. Attorney Coleman further asserts that "Ms. Defendant Trude is actively conducting her own search efforts with a dedicated team, fully supported by the Proudfoot family." *See Exhibit 27* at ¶7. This admission only strengthens the allegations made against the Defendants in this case, as coordination with the Proudfoots is central to advancing their unlawful Enterprise, with social media serving as their primary tool.

50. That same day, the undersigned served a Cease and Desist Demand to Rikki Smith, a/k/a "Clueminnati," as she continued to propagate hateful rhetoric. A

true and correct copy of the Cease and Desist letter to Rikki Smith is attached hereto as Exhibit 28 and incorporated by reference herein.

51. On that same day, Defendant Trude used the Cease and Desist letter shown in Exhibit 26 to her advantage by leveraging it to solicit GoFundMe donations under the false pretense of being "silenced" from covering the disappearance of Sebastian Rogers. A true and correct copy of the GoFundMe page created by "Bbq Lady" on September 17, 2024, is attached hereto as Exhibit 29 and incorporated by reference herein.

52. That evening, the undersigned replied to Attorney Coleman's letter, reiterating the demand that her client cease and desist from the reckless behavior. A true and correct copy of the email to Attorney Coleman from the undersigned is attached hereto as Exhibit 30 and incorporated by reference herein.

53. Shortly before 8 p.m. on September 17, 2024, Attorney Coleman emailed the undersigned, writing: "**I have never made a post or video of any kind on the Sebastian Rogers case**, so I am wondering if you actually watched any of the posts on the account linked in your email. **I have never removed a post about it either.** I have not commented at all, as I am a moderator for a different creator and agreed not to address the case at all since Mr. Mathis' involvement. I have kept my word on that." A true and correct copy of this email is attached hereto as Exhibit 31, specifically referring to ¶ 3.

54. However, this statement is demonstrably false. Attorney Coleman has **1) advised Defendant Trude about raising funds**, as evidenced in the following exchange:

- Defendant Trude: "(0:00) Or that might want to, you know, donate to it."
- Attorney Coleman: "(0:04) Yeah, there's lurkers like me that, you know, are going to be driven over to your GoFundMe campaign. So it's like, this is brilliant, thank you. This only helps."

and 2) regularly participates in panels and discussions on the very channels being brought before this Court. A true and correct copy of these interactions is attached hereto as Exhibit 32 and incorporated by reference herein.

55. Between September 17 and September 20, 2024, Attorney Coleman assisted Defendant Trude in locating legal counsel to defend against this matter. She also continued to e-mail the undersigned, emphatically distancing herself from any direct involvement in harmful activities, including harassment, incitement of interference, or inappropriate remarks.

56. She claims she did not participate in specific livestreams, denies making public comments about the Sebastian Rogers case, and demands that defamatory statements about her cease.

57. Attorney Coleman routinely participates in the Enterprise by representing various members, ensuring that victims are discouraged from seeking legal recourse through the courts. A true and correct copy of a photo showing Coleman on a panel with Defendant Trude, along with Enterprise members Jane Does 1 through 5, is attached hereto as Exhibit 33 and incorporated by reference herein. The individuals featured are: bratnorton, CI, Katie, Jill, Baudi Moovan, and Character Analysis, all active on TikTok. During this specific live session, Attorney Coleman participated in a panel that was doxing a victim, referred to here as

"Oceans" to prevent further exposure of her identity. During the live, it was stated that *"someone supplied them with info on Chase and Tony."* *Id.*

58. On September 18, instead of accurately representing the nature of this legal communication, Defendant Trude engaged in a GoFundMe campaign to raise \$25,000, falsely claiming the funds were required for a federal attorney's retainer to defend against litigation. Defendant Trude publicly stated: "Yeah, I do have a GoFundMe for \$25,000." (31:54-31:57) "I am retaining a federal attorney and the retainer is \$25,000." (32:39-32:56) A true and correct copy of the 2 hour 17 minute audio version of Defendant Trude discussing this on a live stream is attached hereto and referenced herein as **Exhibit 34**.

59. Despite these assertions, no lawsuit had been filed against Defendant Trude as of the date of her statements. Her false characterization of the cease and desist letter as litigation was a deliberate attempt to deceive her audience into donating money under the pretense of impending legal action. *Id.*

60. When pressed by her audience about the nature of her legal troubles, Defendant Trude repeatedly implied that she could not disclose details due to ongoing litigation: "I can't discuss any of the details." (32:07) "I'm trying to think of my verbiage cause I know everybody's watching and like to twist my words." (33:08-33:19) (See **Exhibit 34**)

61. These statements were made to create an aura of secrecy and urgency, misleading potential donors into believing that Defendant Trude was involved in active, significant legal proceedings, when in reality, she had merely received a cease and desist letter—a non-litigation communication demanding that she stop defamatory conduct. *Id.*

62. Defendant Trude attempted to distance herself from the GoFundMe by claiming: "Somebody made [the GoFundMe] on my behalf and wrote the whole thing and it was witnessed with an attorney." (33:58-34:14) (See Exhibit 34)

63. However, despite her admission, Defendant Trude publicly promoted and benefited from the fundraiser, rendering her responsible for its fraudulent content. Defendant Trude's misrepresentation of a cease and desist letter as active litigation constitutes both fraud and unjust enrichment, as she solicited and received funds under false pretenses. *Id.*

64. That same morning, the undersigned received several concerning reports, including one stating that "influencers" on YouTube were claiming that my law firm was corrupt. This was being broadcast during a livestream, with creators on the panel openly making these accusations. One of the creators even called my office. The channels identified were Clueminiatti, Granny's Watching, and Queen Bee. A true and correct copy of the email from the call service is attached hereto as Exhibit 35 and incorporated by reference herein.

65. Furthermore, I did not consent to having calls to my office broadcast on social media, which demonstrates the extent to which these "creators" are willing to go. Additionally, I experienced a particularly troubling incident when "Granny's Watching" (Defendant Seng) stated during a livestream that she was driving to Media, Pennsylvania, with the intent to visit my office. This was perceived as a threatening action. However, following a brief phone call between Ms. Seng and the undersigned, she subsequently decided to return home.

66. On September 19, 2024, Plaintiff Dog the Bounty Hunter, accompanied by co-counsel the Hon. Bruce Castor, Esquire, appeared live on Court TV during the

morning show to discuss the disappearance of Sebastian Rogers. During the interview, Mr. Castor made it clear:

"As a more than three-decade law enforcement official myself in Pennsylvania, a former district attorney, and former attorney general, I understand the frustration local authorities must be feeling. From my own experience, I know that sometimes you need experts—like Dog [the Bounty Hunter], experts who are willing to give their time and energy to assist law enforcement in doing their job.

"I was stunned when I learned the facts of this case. A young boy is missing, and the mother and stepfather don't seem to be particularly distraught. I'm sure that's something many people are questioning.

"What's also striking is the death threats and threats against safety that the search team, including the dog handlers, are receiving. This is unacceptable. We need to encourage people to step forward, whether they are donating money for a reward or volunteering their time. That's good citizenship, not something to be punished.

*"Yet, some individuals are behaving in ways that, in my opinion, are not good conduct. The people involved in this case—the dog handlers, the team, and the entire crew—are doing a tremendous job. **If things worsen, I will recommend they take legal action because this situation has become totally unreasonable.***

“Law enforcement and the community, working together, will solve this crime.”

67. A true and correct copy of the CourtTV audio is attached hereto as Exhibit 36 and incorporated by reference herein. (See Exhibit 36 at 06:38 – 08:17)

68. That same day, Defendant Seng (Granny's Watching) hosted a 2-hour and 42-minute livestream dissecting the 17-minute interview with Plaintiff Dog the Bounty Hunter and counsel Bruce Castor, during which she disregarded the law and its protocols. A true and correct copy of the livestream is attached hereto as Exhibit 37 and incorporated by reference herein.

69. While Mr. Castor and Plaintiff Dog the Bounty Hunter were on national television advocating for the search for Sebastian Rogers, Plaintiff Nik Hatziefstathiou was summoned to the Pennsylvania Department of Probation and Parole due to an alarming flood of false reports concerning his involvement in the case.

70. These reports spiraled into outlandish allegations, suggesting that Mr. Hatziefstathiou had made repeated contact with Christopher and Kate Proudfoot and, even more bizarrely, that he had traveled to Tennessee with Dog the Bounty Hunter in an attempt to *kidnap individuals* and *inject them with “truth serum”*—all in a supposed effort to extract confessions. This fantastical narrative, worthy of a conspiracy theory, prompted unwarranted actions by the authorities despite the absolute falsity of the claims.

71. As a result of these unfounded reports, Mr. Hatziefstathiou was slapped with extraordinarily restrictive and irrational conditions by the Parole Board. First, he was forbidden from working with any law enforcement agencies without *explicit*

written permission from the Parole Board itself, with the order stating emphatically: “*THERE ARE NO EXCEPTIONS!*” A true and correct copy of the order from the Pennsylvania Parole Board, barring Plaintiff Nik Hatziefstathiou from working with law enforcement, is attached hereto as Exhibit 38 and incorporated by reference herein.

72. The absurdity of this restriction is self-evident. Despite Mr. Hatziefstathiou's role in assisting with the search for a missing child, he was effectively barred from collaborating with the very entities tasked with finding that child—local law enforcement and federal agencies. Such a restriction, particularly in a high-stakes situation like this, not only handicaps efforts to locate Sebastian but also raises serious questions about the motivations behind the enforcement of these orders.

73. Adding to the insanity, a second order was issued barring Mr. Hatziefstathiou from contacting Christopher Proudfoot and his family in any form—directly or indirectly—via social media, phone calls, texts, or even through third parties. The language of the order was as severe as the first: “*THERE ARE NO EXCEPTIONS!*” A true and correct copy of the order from the Pennsylvania Parole Board, barring Plaintiff Nik Hatziefstathiou from any contact with Christopher Proudfoot and his family, is attached hereto as Exhibit 39 and incorporated by reference herein.

74. As noted by Plaintiff Xie, what makes this all the more incredulous is the fact that there had been minimal contact between Mr. Hatziefstathiou and the Proudfoots—no more than three calls in total, and, in an ironic twist, several of those calls had been initiated by Christopher Proudfoot himself. Despite this, Mr.

Hatziefstathiou now faces severe restrictions based on nothing more than a web of fabrications spun by individuals' intent on diverting attention from the real search for Sebastian Rogers. A true and correct copy of the Sworn Declaration of Hong Xie, Managing Partner of AtNight, is attached hereto as **Exhibit 40** and incorporated by reference herein.

75. The combination of these conditions—the ban on working with law enforcement and the restriction on contacting the Proudfoots—is nothing short of bizarre and raises serious concerns about the influence of malicious parties feeding into the narrative. These restrictions, based on fictitious reports, have only served to obstruct the search for a missing child and undermine legitimate efforts to bring justice to Sebastian Rogers.

76. On September 20, 2024, news networks reported that Plaintiffs Dog the Bounty Hunter, AtNight, and Tony Mathis had issued Cease and Desist demands to certain content creators. Plaintiff Mathis, spokesperson for Mr. Rogers, emphasized the importance of AtNight's involvement, stating, *"They bring a social media team, they bring an investigative team, and they bring a legal team. And those are things that were all desperately needed. In addition to Dog's passion and the overall horsepower of his organization, the case has been amplified tenfold just in the last two weeks."* A true and correct copy of the CBS 42 news article reporting this is attached hereto as **Exhibit 41** and incorporated by reference herein.

77. That same day, it was reported that Plaintiffs AtNight and Dog the Bounty Hunter expressed their belief that they "know who is responsible for the disappearance of Tennessee teen Sebastian Rogers" and discussed their plans to

assist in tracking down the 15-year-old with autism. A true and correct copy of this report is attached hereto as Exhibit 42 and incorporated by reference herein.

78. However, that afternoon, co-counsel Bruce L. Castor, notified the undersigned that Dillon McCanless King Coulter and Graham LLP, of Butler, Pennsylvania, had entered their appearance on behalf of Defendant Trude. A true and correct copy of this notice is attached hereto as Exhibit 43 and incorporated by reference herein.

79. On the same day Dillon McCanless King Coulter & Graham LLP entered their appearance for Defendant Trude, Attorney Judy Coleman sent an email that reveals a clear attempt to suppress further discussion about her involvement. In the email, Coleman insists that Plaintiffs refrain from discussing her, her practice, or her clients on social media, citing “serious missteps” in their representations. A true and correct copy of Attorney Coleman's email is attached hereto as Exhibit 44 and incorporated by reference herein.

80. This pattern has been evident in Defendant Trude's previous conduct, and now, Attorney Coleman's own correspondence aligns with these methods, contributing to the Enterprise's overall strategy of intimidation and legal maneuvering, noting:

“Now that I have entrusted this matter to Mr. King, I will no longer need to receive copies of any correspondence or emails. I am confident he is more than capable of handling you and your clients. However, I respectfully request that your clients refrain from engaging in discussions or making comments on social media about me, my practice, or the clients I represent. They have already made several

serious missteps and represented me in a false light. Please caution them against discussing, responding to, or commenting on any aspect of my professional experience, education, law firm, or clients. I also strongly advise that you and your clients ensure that any future allegations are factually accurate, unlike the incorrect statements made in your previous emails. They should choose their words carefully and realize that if this continues, I will have no choice but to retain counsel as well.” Id.

81. In the broader context of this case, the Enterprise’s repeated attempts to use legal mechanisms to intimidate and silence Plaintiffs—from cease and desist letters to direct legal threats—fit squarely within the framework of obstructive tactics aimed at impeding the investigation or intimidating individuals. *Id.*

82. On September 30, 2024, an individual identifying themselves as an *FBI Postal Inspector*, wearing a badge, attempted to question Michelle Clubine after she and her husband received constant threats and harassment online. A true and correct copy of the Sworn Declaration of Michelle Clubine, specifically referring to ¶¶ 2-6, is attached hereto as Exhibit 45 and incorporated by reference herein.

83. On October 1, 2024, Kenneth Clubine, a/k/a Uncle Taco, called the Oklahoma City branch of the FBI to report the incident involving the individual posing as an FBI Postal Inspector. A true and correct copy of the Sworn Declaration of Kenneth Clubine, specifically referring to ¶4, is attached hereto as Exhibit 46 and incorporated by reference herein.

84. On October 2, 2024, Plaintiff AtNight issued a litigation hold *via* email to all contractors, personnel, representatives, social media moderators, public

figures, clients, and other relevant parties associated with the search for Sebastian Wayne Drake Rogers. The email instructed all recipients to preserve any materials that could be considered relevant to the case. A true and correct copy of this litigation hold email is attached hereto as Exhibit 47 and incorporated by reference herein.

85. On October 5, 2024, at approximately 7:16 p.m., a white Chevy truck pulled into Plaintiff Hong Xie's driveway, which is hidden from the road. A man exited the vehicle, leaving his door ajar, and began peering into the windows of the home. He knocked on the door and, after noticing the security camera, quickly left. See Sworn Declaration of Hong Xie at Exhibit 40.

- (a) A true and correct copy of the video showing the truck arriving is attached hereto as Exhibit 48.
- (b) A true and correct copy of the video showing the man walking to the door is attached hereto as Exhibit 49.
- (c) A true and correct copy of the side-angle video of the incident is attached hereto as Exhibit 50.
- (d) A true and correct copy of the still photo of the man is attached hereto as Exhibit 51.

III. SETH ROGERS

86. Defendant Seng repeatedly twists Mr. Rogers' words, portraying him as insincere, manipulative, and unfit as a parent. This is not just a personal vendetta, but part of a larger, coordinated attempt by the Enterprise to discredit Mr. Rogers in the eyes of the public. The mocking and distorting of his words serve the dual

purpose of undermining his credibility and inciting further harassment from Defendant Seng's audience.

87. Defendant Seng mocks Mr. Rogers for stating, "I just want a divorce, so I can start again" (0:19), turning this into an opportunity to paint him as someone dismissive of his responsibilities. She sarcastically thanks him for "being so nice during the divorce" (0:32-0:39), encouraging her audience to view him as deceitful. A true and correct copy of the sped-up 2x audio recording is attached hereto as Exhibit 52 and incorporated by reference herein.

88. This distortion of Mr. Rogers's statements reflects the broader strategy of the Enterprise, with Defendants Seng and Trude coordinating efforts to undermine victims' credibility through mockery, manipulation, and defamation as tools of harassment.

89. Defendant Seng's persistent sarcasm goes beyond mere commentary; it is a tactic used to diminish Mr. Rogers's character and portray him as untrustworthy, echoing the sarcastic attacks frequently employed by Defendant Trude and other members of the Enterprise, where sarcasm is weaponized to belittle, and the audience is encouraged to join in the public degradation.

90. "Oh, he's such a good guy. Thank you for being so nice during the divorce" (0:32-0:39) mocks Mr. Rogers's efforts to present himself as responsible, twisting his words to imply hypocrisy. *See Exhibit 52.*

91. The use of sarcasm and ridicule aligns with the Enterprise's broader strategy of public character assassination. Defendant Seng's mocking tone not only serves to discredit Rogers, but also to mobilize her followers to further participate in this coordinated defamation.

92. Defendant Seng actively engages her audience in the harassment by prompting real-time reactions and contributions to the defamation of Mr. Rogers, mirroring Defendant Trude's tactic of encouraging public shaming and transforming private matters like custody and divorce into a public spectacle.

93. Defendant Seng invites her audience to engage in the narrative of Mr. Rogers's unfitness, creating an echo chamber of public judgment: "Put a 1 in the chat if you've seen the divorce papers. Put a 2 if you did not" (2:06-2:07). *See Exhibit 52.*

94. The orchestration of audience participation in defamation exemplifies how the Enterprise operates on a broader scale, with Defendant Seng's engagement mirroring Defendant Trude's incitement of followers, making public humiliation central to the group's collective goal of silencing and discrediting their targets.

95. Defendant Seng continually mocks Mr. Rogers's emotional struggles, particularly his trauma from the divorce, aligning with the Enterprise's broader tactics of dismissing mental health and personal issues, as seen in the targeting of Plaintiff Andra Griffin and others, thereby reinforcing the strategy of belittling victims' emotional distress.

96. Defendant Seng dismisses Rogers' claims of trauma, sarcastically suggesting, "Get a therapist because it is years later, sir, and you're still not healed" (7:00-7:04), making light of his emotional pain. *See Exhibit 52.*

97. The mockery of trauma across multiple victims demonstrates a continuous and related pattern of behavior by the Enterprise, with Defendant Seng's consistent dismissal of mental health aligning with Defendant Trude's similar

treatment of plaintiffs, highlighting the orchestrated nature of the Enterprise's psychological harassment.

98. Defendant Seng distorts the legal context of Mr. Rogers' custody and divorce issues by falsely implying that he was deemed "borderline abusive" by the courts, a deliberate misrepresentation that aligns with Defendant Trude's similar tactics of distorting legal proceedings to mislead the public and discredit plaintiffs, illustrating how the Enterprise manipulates legal narratives to harm their targets.

99. Defendant Seng falsely claims, "Mr. Rogers states that the courts deemed him borderline abusive" (2:00-2:06), when no such legal finding exists. This intentional misrepresentation serves to undermine Mr. Rogers's credibility and paint him in a negative light. *See Exhibit 51.*

100. The deliberate distortion of legal facts by Defendant Seng is part of the broader Enterprise strategy seen in Defendant Trude's campaigns. The use of false legal claims to discredit victims shows a coordinated effort to manipulate public perception and attack the reputations of those who challenge the Enterprise.

101. Defendant Seng uses Mr. Rogers' divorce and custody battle as a key point of attack, twisting the narrative to portray him as an unfit father and husband. This tactic of weaponizing personal legal matters is commonly employed by the Enterprise, turning private family issues into public spectacles to discredit and humiliate. Defendant Trude has similarly exploited family disputes in her attacks on other plaintiffs, indicating a shared strategy within the Enterprise. *See Exhibit 52.*

102. Defendant Seng mocks Mr. Rogers for allegedly seeking alimony and being a "nice guy" during the divorce, stating, "You asked for alimony, but you

were so nice" (0:42-0:45). This sarcastic remark is designed to undermine Mr. Rogers's character by framing his actions as hypocritical. *Id.*

103. Defendant Seng's focus on Mr. Rogers's divorce aligns with Defendant Trude's broader strategy of using personal legal matters as a tool for defamation, reinforcing the organized and continuous nature of the Enterprise's attacks. *Id.*

104. Defendant Seng often resorts to baseless speculation to further undermine Mr. Rogers credibility. By implying drug use, neglect, and irresponsibility, Defendant Seng encourages her audience to view Mr. Rogers as a flawed, untrustworthy figure. These speculative attacks mirror Defendant Trude's false accusations against other plaintiffs, where unfounded allegations are presented as fact to sway public opinion. *See Exhibit 52.*

105. Defendant Seng falsely implies that Mr. Rogers is hypocritical regarding his stance on medication, "But you sure as fuck had no problem taking those pharmaceutical medications for yourself" (5:20-5:24). *Id.*

106. The repetition of unfounded accusations across multiple plaintiffs demonstrates a pattern of defamation that is central to the Enterprise's racketeering activities. Defendant Seng's speculative attacks align with the broader strategy of spreading false narratives, revealing a clear connection to the continuous and organized effort by Defendant Trude and Seng to discredit their victims. *Id.*

107. Defendant Seng does not merely mock and insult Mr. Rogers; she actively encourages her audience to join in, fostering a culture of public humiliation designed to amplify the emotional and psychological harm, mirroring Defendant Trude's tactic of mobilizing followers to intensify the impact on victims. *See Exhibit 52.*

108. Defendant Seng calls on her followers to “put out your declarations” (2:36-2:44), pushing Mr. Rogers to expose more of his personal life to public scrutiny. This public demand is a form of intimidation and control, echoing Defendant Trude’s similar efforts to humiliate other plaintiffs through the exposure of personal information. *Id.*

109. The coordinated effort to publicly humiliate victims shows a continuous pattern of racketeering activity, as Defendant Seng’s role in encouraging her audience to participate in the harassment demonstrates the Enterprise’s use of public platforms to amplify harm and silence opposition. *Id.*

110. Defendant Seng’s harassment of Mr. Rogers is intricately linked to the broader efforts of the Enterprise led by Defendant Trude and associates. Defendant Seng’s mockery, manipulation, false accusations, and incitement of her audience are all part of a coordinated strategy to discredit and defame Mr. Rogers, aligning with the larger pattern of racketeering activity in this case. *Id.*

IV. TONY MATHIS

111. Defendant Trude frequently discusses her access to resources, referring to it as a "chain of command." She bragged: "I forget the name of it, but it's like the domino effect...the person who originally took the video, leaked the video, and sent it to somebody, then someone sent it to somebody else." A true and correct copy of the audio version of Defendant Trude discussing this on a live stream is attached hereto and referenced herein as Exhibit 53.

112. The "domino effect" described by Defendant Trude demonstrates a pattern of racketeering activity under the RICO Act (18 U.S.C. § 1962), as the

coordinated sharing and distribution of the video indicates a conspiracy to engage in continuous and organized criminal conduct.

113. Each act of sharing the video constitutes an overt act of conspiracy, in violation of both RICO and Pennsylvania criminal conspiracy statutes (18 Pa. Cons. Stat. § 903).

114. Defendant Trude asserted: "Yeah, yeah, yeah. Well, you know, well, kind of, but it's, there's a legal term actually for it. And every single fucking person that shared that video of Caleb can all be fucking prosecuted." *See Exhibit 53.*

115. Defendant Trude's acknowledgment that "every single person that shared that video of Caleb can all be fucking prosecuted" demonstrates her awareness of the illegality of the Enterprise's conduct. Her statement indicates active involvement in a criminal conspiracy to commit harassment and defamation, in violation of Pennsylvania criminal conspiracy laws (18 Pa. Cons. Stat. § 903) and RICO's conspiracy provisions (18 U.S.C. § 1962(d)).

116. Each participant in the chain of distribution is a conspirator furthering the Enterprise's unlawful objectives, exposing them to criminal liability.

117. In the same live stream, Defendant Trude declared: "And you know what? It's my fucking mission. And it's been my little undercover mission. I know you guys are probably wondering where we're at, but we're, we are up to something." *See Exhibit 53.*

118. Defendant Trude's statement about an "undercover mission" to target individuals within the context of sharing harmful content demonstrates a premeditated conspiracy.

119. This satisfies the elements of racketeering activity under RICO (18 U.S.C. § 1962(d)) and criminal conspiracy under Pennsylvania law (18 Pa. Cons. Stat. § 903).

120. Under Pennsylvania law, criminal conspiracy is established when two or more individuals agree to engage in unlawful conduct with at least one overt act in furtherance of the conspiracy.

121. The overt acts in this case involve the deliberate dissemination of harmful content, which violates multiple provisions of Pennsylvania law, including harassment (18 Pa. Cons. Stat. § 2709) and defamation (42 Pa. Cons. Stat. § 8343).

122. Additionally, Defendant Trude's statement reflects a calculated, organized effort to harm others, demonstrating the continuity and structure required for establishing a pattern of racketeering activity. This aligns with Pennsylvania's broad definition of conspiracy, where intent and action to promote or facilitate illegal conduct suffice for prosecution.

123. Furthermore, each participant in the dissemination of harmful content is implicated as an active conspirator in furtherance of the criminal Enterprise, exposing them to substantial criminal liability under both federal and state law.

124. Defendant Trude and her panelists continued: "Okay. We're not avoiding being on TikTok because we're afraid or scared. We've been working. And all I'm going to say is if anyone thinks that they're going to fuck with us, I fucking dare you." *See Exhibit 53.*

125. Defendant Trude's overt threat—"I fucking dare you"—constitutes intimidation and extortion under federal law (18 U.S.C. § 875) and Pennsylvania's extortion statutes (18 Pa. Cons. Stat. § 3923).

126. Extortion in Pennsylvania involves using threats of harm to coerce behavior, and her statement is designed to intimidate and deter opposition to the Enterprise's activities through threats of retaliation.

127. This conduct, reflective of organized criminal behavior, aims to prevent interference or exposure, thereby advancing the Enterprise's unlawful goals.

128. In a live stream, Defendant Trude declared: "Fucking dare you. I dare you. This shit right here, though, these foul fucking human beings, birds of a feather flock together." *See Exhibit 53.*

129. The continuation of intimidation tactics in Defendant Trude's language, coupled with derogatory remarks, highlights a clear pattern of harassment in violation of 18 Pa. Cons. Stat. § 2709.

130. Her repeated threats—"I dare you"—aim to intimidate and coerce others into compliance or silence, punishable under Pennsylvania's criminal harassment statutes and also form part of a broader criminal conspiracy within the Enterprise.

131. Defendant Trude further stated: "It is my fucking mission to take Tony the fuck down. So however that looks for you or whatever you want to imagine in your, in your God-given brain, whatever. When I say take them down, I mean like he should not be a fucking spokesperson for anybody's missing child, in my opinion." *See Exhibit 53.*

132. This statement demonstrates Defendant Trude's intent to cause significant harm to Tony L. Mathis through a coordinated campaign of harassment and defamation, further supporting a criminal conspiracy (18 Pa. Cons. Stat. § 903) and racketeering activity under RICO (18 U.S.C. § 1962). Her admission of a

mission to "take Tony down" reflects the calculated, unlawful objective of the Enterprise to discredit and harm through intimidation and defamation.

133. Under Pennsylvania law, fraud occurs when a party knowingly makes false representations with the intent to induce others to act. Defendant Trude's public solicitation of funds, based on the false claim that she needed \$25,000.00 to retain a federal attorney for ongoing litigation, constitutes fraudulent misrepresentation. Despite receiving only a cease and desist letter, which does not constitute litigation, Defendant Trude knowingly implied that she was under legal threat to justify her fundraising campaign.

134. Defendant Trude's actions constitute unjust enrichment by collecting funds under the false premise of a non-existent lawsuit, misrepresenting the cease and desist letter, and fabricating a false narrative to unjustly gain financial support from her audience.

135. Defendant Trude's deliberate misrepresentation of a cease and desist letter as ongoing litigation in her fundraising campaign constitutes fraud, demonstrating a pattern of deceit and an attempt to unjustly enrich herself by misleading her audience. The Court should enjoin Defendant Trude from continuing to solicit funds under these false pretenses and order the return of all funds raised through the fraudulent campaign.

V. BRITTNEY NICOLE JACKSON

136. In multiple live broadcasts on YouTube, Defendant Seng engaged in a concerted effort to defame, harass, and intimidate Plaintiff Brittney Nicole Jackson, a/k/a "Brittney J," as part of a broader coordinated attack with her associates. These statements are not isolated incidents but rather form a sustained campaign of

targeted harassment, threats, and defamation, violating both Pennsylvania and federal laws and fitting into a pattern of conduct that constitutes part of a corrupt Enterprise, as defined under 18 Pa.C.S. § 911 (Corrupt Organizations Act) and 18 U.S.C. § 1962 (RICO).

137. In her live stream, Defendant Seng directly threatened Brittney J, stating: "I will make you a fucking victim. You want to go legal? I will give you a reason to go legal. You have crossed every fucking boundary there is." (5:59 - 6:01) A true and correct copy of the "Granny's Watching" livestream audio, lasting 16 minutes and 54 seconds from May 9, 2024, is attached hereto as Exhibit 54 and incorporated by reference herein.

138. Defendant Seng's intent to "make [Brittney] a victim" and provoke legal retaliation demonstrates a malicious, targeted attack designed to intimidate and harass, further supporting a claim of racketeering activity under 18 U.S.C. § 1961. These threats, made in public, also serve to escalate the level of intimidation, forming part of the conspiracy to obstruct Brittney's efforts to defend herself legally.

139. Defendant Seng continued her attack on Brittney J's character in a public forum, stating: "You are a lazy wasteful piece of shit... I don't speak on you Brittany. I don't fucking talk about you." (5:16 - 5:31) *See Exhibit 54.*

140. Defendant Seng's acknowledgment of her involvement in a coordinated retaliatory effort against Brittney J and her associates further highlights the presence of an Enterprise engaging in racketeering activity. Defendant Seng states: "Then I'm gonna fucking be and I'm gonna do to you every single thing that you and your fucking YouTube associates do to me and mine." *See Exhibit 54 at (1:54).*

141. Defendant Seng's statement demonstrates her active participation in a conspiracy under 18 Pa.C.S. § 903 and involvement in a corrupt organization as defined under 18 Pa.C.S. § 911, with her reference to Brittney's "YouTube associates" indicating a broader network of individuals collaborating to attack and harass Brittney, thereby forming the basis for a civil conspiracy claim under Pennsylvania law and supporting the RICO elements of a coordinated Enterprise.

142. Defendant Seng attempts to downplay her actions by stating: "Playing your own words isn't harassing and bullying. You know what harassing and bullying is? First off, we're adults." (2:54 - 3:00) A true and correct copy of the "Granny's Watching" audio from May 9, 2024, lasting 4 minutes and 32 seconds, is attached hereto as Exhibit 55 and incorporated by reference herein.

143. This dismissive statement is part of an ongoing campaign of cyberbullying disguised as "playing words back" to deflect accountability, falling under the scope of 18 Pa.C.S. § 2709 and contributing to a RICO claim by forming part of the sustained, organized harassment aimed at causing Brittney emotional distress and reputational harm.

144. Defendant Seng also targeted Brittney J by spreading false and inflammatory narratives, implying that Brittney neglects or abuses her own children: "You won't find bags under my kid's eyes. You won't ever catch me driving with my children unbuckled standing up." (0:23 - 0:31) A true and correct copy of the "Granny's Watching" audio clip from May 9, 2024, lasting 44 seconds, is attached hereto as Exhibit 56 and incorporated by reference herein.

145. These statements constitute further defamation aimed at discrediting Brittney as a mother and person, fostering public animosity against her through

malicious and false insinuations about child neglect, and are designed to damage her reputation both within her community and online.

146. Defendant Seng's statements demonstrate a clear intent to manipulate public perception and discredit Brittney J's reputation, as seen in her direct statements: "How dare you, Brittney, how fucking dare you put this shit on me. If you know, I came so she can hide that she fucking does it." *See Exhibit 56* at (1:43 - 1:48)

147. Defendant Seng has employed coordinated, defamatory tactics to harm Plaintiff Brittney Nicole Jackson (Brittney J), as part of a broader Enterprise involving multiple individuals aimed at discrediting and shaming her. In a livestream, Defendant Seng falsely implicated Brittney J in the tragic death of a man outside her home, using strategies consistent with those employed by Defendant Stephanie Jo Trude and others in the criminal Enterprise. Defendant Seng's repeated and malicious actions violate Pennsylvania's Harassment Statute (18 Pa.C.S. § 2709), Defamation law (42 Pa. Cons. Stat. § 8343), the Racketeer Influenced and Corrupt Organizations (RICO) Act (18 U.S.C. § 1962), and Pennsylvania's Corrupt Organizations Act (18 Pa.C.S. § 911).

148. Defendant Seng's mention of the tragic death of a man outside Brittney J's home is a deliberate attempt to weaponize personal misfortunes to manipulate public perception and defame Brittney J. Defendant Seng stated: "Let's talk about the man that died outside her home and what happened with that." (0:16) A true and correct copy of the 40-second "Granny's Watching" livestream clip from July 24, 2024, is attached hereto as **Exhibit 57** and incorporated by reference herein.

149. Defendant Seng uses this tragedy to suggest that Brittney J was at fault or behaved inappropriately following the incident, mirroring the broader strategy used by Defendant Trude and others in the Enterprise to exploit personal events—such as family disputes or tragedies—for defamatory purposes. This pattern is consistent with Defendant Trude's attacks on Mr. Rogers, Mr. Mathis, Mr. Hatziefstathiou, Mr. Xie, Ms. O'Donnell, Dog the Bounty Hunter, Ms. Griffin, and many others, where she similarly weaponized their personal experiences to discredit them.

150. Defendant Seng's exploitation of this tragedy is part of the Enterprise's continuous scheme to defame individuals by manipulating personal stories, fitting the continuity prong of RICO, as it represents not an isolated incident but a pattern of ongoing defamation and harassment aimed at the plaintiffs.

151. Defendant Seng also employed sarcasm and false sympathy to insinuate that Brittney J failed to respect the family of the deceased. Defendant Seng remarked: "Yeah, it must have been horrifying... But let's talk about how much respect was shown to their family that was mourning." *See Exhibit 57* at (0:31-0:36)

152. This sarcastic commentary pretends to express concern while subtly suggesting that Brittney J was callous in her response to the tragedy. This tactic mirrors Defendant Trude's use of sarcasm when mocking Mr. Rogers, Andra Griffin, Mr. Mathis, Mr. Hatziefstathiou, Mr. Xie, Ms. O'Donnell, Dog the Bounty Hunter, and others, attempting to twist the narrative to damage their reputations while maintaining a veneer of objectivity.

153. Defendant Seng's statements also function to incite her audience to join in the public shaming of Brittney J. She described the death outside Brittney J's

home in detail, encouraging her followers to focus on how Brittney handled the tragedy: “Yeah, she called me and told me some, you know, some poor younger guy died outside of her home.” *See Exhibit 57* at (0:26)

154. This tactic of rallying her audience to reinforce the narrative is part of the Enterprise’s strategy to mobilize collective attacks, with Defendant Seng and Defendant Trude both inciting followers to participate in coordinated harassment, such as reporting plaintiffs’ GoFundMe accounts. This mobilization for public shaming satisfies the Enterprise element of RICO, demonstrating the organized and coordinated nature of their activities.

155. Defendant Seng’s narrative about the man’s death is part of a broader effort to craft defamatory stories that cast plaintiffs like Brittney J in a negative light, without any factual basis. Defendant Seng’s comment: (0:33-0:36) “Let’s talk about how much respect was shown to their family that was mourning” is intended to portray Brittney J as morally lacking, even though there is no evidence to support such claims. This tactic is used throughout the Enterprise by Defendant Trude, who often twists personal stories—such as Mr. Rogers’ custody battle—to create damaging narratives that undermine the plaintiffs’ credibility. *See Exhibit 57.* The use of deflection to frame plaintiffs for events they had no control over is a coordinated strategy within the Enterprise. By twisting narratives to cast blame on the plaintiffs, Defendant Seng and Defendant Trude engage in a **continuous scheme** of defamation and harassment, further supporting the **RICO** claim.

VI. **ANDRA GRIFFIN**

**COUNT I – DEFAMATION, HARASSMENT, AND INTENTIONAL
INFILCTION OF EMOTIONAL DISTRESS AGAINST ANDRA GRIFFIN (42
P.A.C.S. § 8343, 18 P.A.C.S. § 2709, PENNSYLVANIA COMMON LAW)**

156. Plaintiff Andra Griffin, also known as "Bullhorn Betty," incorporates by reference all preceding paragraphs as though fully set forth herein. A true and correct copy of the Sworn Declaration of Andra Griffin, a/k/a Bullhorn Betty, is attached hereto as **Exhibit 58** and incorporated by reference herein.

157. Defendants Jessica Lynne Seng and Stephanie Jo Trude engaged in a well-coordinated campaign of defamation, harassment, and intimidation against Ms. Griffin, as described in her Declaration. This campaign involved multiple people acting in concert to damage her reputation, disrupt her work, and instill fear in her daily life (*See* Griffin Declaration ¶¶ 2-3, 8, 13).

158. Defendant Seng initially targeted Ms. Griffin in 2021, with the attacks intensifying as Ms. Griffin's profile grew, particularly during the high-profile investigation of Sebastian Wayne Drake Rogers in March 2024. Seng labeled Ms. Griffin a "tragedy pimp" and a "grifter" and disseminated false information, all with the intent to harm Ms. Griffin's reputation and credibility (*See* Griffin Declaration ¶¶ 4-7, 18). Under Pennsylvania law, 42 Pa.C.S. § 8343, these statements constitute defamation per se as they impute dishonorable conduct to Ms. Griffin, damaging her reputation in her profession.

159. The defamatory and harassing conduct also included false reports to law enforcement, resulting in Ms. Griffin's unjust arrest based on fabricated claims from people under Seng's influence, thereby disrupting her investigations and damaging her professional standing (*See* Griffin Declaration ¶¶ 9-10, 17). These acts

meet the criteria for harassment under 18 Pa.C.S. § 2709, which criminalizes actions intended to cause emotional distress or fear of harm.

160. Defendant Trude soon joined forces with Seng, amplifying false accusations and coordinating efforts to keep the attacks sustained over time (*See Griffin Declaration ¶¶ 11-12, 27*). Their coordinated behavior further included encouraging followers to participate in harassment campaigns against Ms. Griffin, resulting in a continuous effort to harm her emotionally, professionally, and financially (*See Griffin Declaration ¶¶ 13, 27*). This extreme and outrageous conduct meets the elements of intentional infliction of emotional distress under Pennsylvania common law, as the acts were committed with reckless disregard for the likely harm they would cause.

COUNT II – CYBERSTALKING AND CYBER HARASSMENT AGAINST ANDRA GRIFFIN (18 PA.C.S. § 2709(B.1), 18 PA.C.S. § 2709.1, 47 U.S.C. § 223)

161. Plaintiff Griffin incorporates by reference all preceding paragraphs as though fully set forth herein.

162. The coordinated attacks by Defendants involved cyber harassment and cyberstalking that included doxxing Ms. Griffin's home address and encouraging followers to send threatening messages. As a result, Ms. Griffin feared for her safety and had to take extra precautions to protect herself and her family (*See Griffin Declaration ¶¶ 14, 21, 27*). This conduct violated 18 Pa.C.S. § 2709(b.1), which prohibits electronic communications intended to harass or intimidate.

163. Additionally, Defendants Seng and Trude, along with their associates, incited online harassment and stalking by using electronic platforms to threaten Ms. Griffin and disseminate harmful messages. This pattern of behavior constitutes

cyberstalking under 18 Pa.C.S. § 2709.1 and falls under the scope of federal law, 47 U.S.C. § 223, which criminalizes the use of telecommunications to harass or threaten another person (*See* Griffin Declaration ¶¶ 15-16, 20, 22-23).

164. The continuous nature of the threats and harassment, including the dissemination of defamatory content and the mobilization of followers to participate in these actions, caused Ms. Griffin to suffer substantial emotional distress. The persistent nature of these acts shows a deliberate attempt to terrorize and harm her through sustained cyber harassment (*See* Griffin Declaration ¶¶ 16, 28).

COUNT III – CIVIL CONSPIRACY AND COORDINATED DEFAMATION (18 PA.C.S. § 903, PENNSYLVANIA COMMON LAW)

165. Plaintiff Griffin incorporates by reference all preceding paragraphs as though fully set forth herein.

166. Defendants Seng and Trude conspired with other individuals, including online personas such as Queen Bee and @BurntNow, to engage in a concerted defamation campaign aimed at discrediting Ms. Griffin (*See* Griffin Declaration ¶¶ 13, 15, 24-25). This conspiracy involved agreeing to defame Ms. Griffin and encouraging others to participate in coordinated harassment, meeting the elements of civil conspiracy under 18 Pa.C.S. § 903.

167. The conspiracy included overt acts such as disseminating defamatory statements, sharing Plaintiff Griffin's personal information, and inciting followers to engage in harassment. These actions disrupted Ms. Griffin's professional relationships and caused significant reputational harm, as she was falsely accused of engaging in fraudulent schemes and inappropriate relationships (*See* Griffin Declaration ¶¶ 17, 24-27).

168. The organized and continuous nature of these attacks demonstrates a coordinated strategy by Defendants to damage Ms. Griffin's personal and professional life, further establishing a pattern of conspiracy under Pennsylvania law (*See* Griffin Declaration ¶¶ 18, 27-28). The malicious intent behind these defamatory statements and acts of harassment evidences an unlawful agreement to harm Ms. Griffin.

COUNT IV – INTERFERENCE WITH PROSPECTIVE BUSINESS RELATIONS (RESTATEMENT (SECOND) OF TORTS § 766, 18 PA.C.S. § 2709)

169. Plaintiff Griffin incorporates by reference all preceding paragraphs as though fully set forth herein.

170. The false accusations made by Defendants about Ms. Griffin's involvement in fraudulent activities were intended to disrupt her business relationships, including her work on high-profile cases. These statements caused some individuals to distance themselves from Ms. Griffin due to the reputational damage, leading to actual financial harm (*See* Griffin Declaration ¶¶ 17-18, 27).

171. Under the Restatement (Second) of Torts § 766, intentional interference with prospective contractual relations occurs when improper conduct is used to disrupt another's business opportunities. Defendants' repeated defamatory remarks and encouragement of harassment against Ms. Griffin constitute such improper conduct, preventing her from securing work and maintaining professional relationships (*See* Griffin Declaration ¶¶ 5, 8, 24).

172. The intent to disrupt Ms. Griffin's business endeavors and professional reputation is evident from Defendants' coordinated attacks and defamatory statements, which qualify as harassment under 18 Pa.C.S. § 2709, as they were made

with the intent to cause harm to her professional standing (*See* Griffin Declaration ¶¶ 2-3, 6, 27-28).

**COUNT V – VIOLATION OF THE PENNSYLVANIA CORRUPT
ORGANIZATIONS ACT (18 P.A.C.S. § 911) AND RACKETEER
INFLUENCED AND CORRUPT ORGANIZATIONS (RICO) ACT (18 U.S.C.
§ 1962)**

173. Plaintiff Griffin incorporates by reference all preceding paragraphs as though fully set forth herein.

174. Defendants Jessica Lynne Seng and Stephanie Jo Trude, along with their associates, engaged in a pattern of racketeering activity through an enterprise engaged in ongoing criminal conduct, including defamation, harassment, stalking, and conspiracy. This activity constitutes a violation of the Pennsylvania Corrupt Organizations Act, 18 Pa.C.S. § 911, and the federal RICO Act, 18 U.S.C. § 1962, which prohibit the use of an enterprise to engage in a pattern of racketeering activity.

175. The enterprise involved multiple individuals acting in concert to harm Ms. Griffin through repeated acts of defamation, cyber harassment, and intimidation, designed to damage her reputation, disrupt her work, and cause her emotional and financial harm (*See* Griffin Declaration ¶¶ 2-3, 8, 13, 27-28). The actions of Defendants Seng and Trude were not isolated but demonstrated a continuous effort to undermine Ms. Griffin's professional credibility and personal safety.

176. Defendants Seng and Trude conspired with other online personas, including Queen Bee and @BurntNow, to participate in an organized campaign targeting Ms. Griffin. These coordinated acts included the dissemination of false and defamatory statements, the publication of Ms. Griffin's personal information (doxxing), and the incitement of others to engage in harassment (*See* Griffin

Declaration ¶¶ 13-15, 24-25). This pattern of related acts demonstrates the continuity and relatedness required under 18 Pa.C.S. § 911 and 18 U.S.C. § 1962.

177. The enterprise engaged in overt acts of racketeering, including:

- Defamation and False Reports: Defendants Seng and Trude made false statements about Ms. Griffin, accusing her of exploiting tragedies and engaging in fraudulent schemes, which damaged her reputation and professional opportunities (*See* Griffin Declaration ¶¶ 5-8, 17-18).
- Cyber Harassment and Stalking: The Defendants and their associates engaged in repeated acts of cyber harassment, including threats and the publication of Ms. Griffin's home address, which placed her in fear for her safety (*See* Griffin Declaration ¶¶ 14, 20-21, 27).
- Conspiracy to Disrupt Investigations: Defendants coordinated false reports to law enforcement aimed at disrupting Ms. Griffin's investigative work and discrediting her professional efforts (*See* Griffin Declaration ¶¶ 9-10, 13).

178. The acts of defamation, harassment, and conspiracy were committed with the specific intent to further the enterprise's unlawful objectives. The repeated targeting of Ms. Griffin, combined with similar attacks on other plaintiffs, demonstrates the ongoing and organized nature of the enterprise's criminal conduct, satisfying the requirements of 18 Pa.C.S. § 911(e) and 18 U.S.C. § 1961(5) for a pattern of racketeering activity (*See* Griffin Declaration ¶¶ 24-26).

179. Defendant Trude's public statements further demonstrate the existence of the enterprise and its purpose. For example, Trude's acknowledgment of a "chain of command" for sharing defamatory content reflects a structured plan to

disseminate harmful information and incite harassment against Ms. Griffin and others, evidencing the existence of a corrupt organization (*See* Griffin Declaration ¶¶ 13, 25, 28).

180. The racketeering activity caused significant harm to Ms. Griffin's personal, emotional, and professional life. The continuous nature of the enterprise's attacks not only damaged her reputation but also disrupted her business and placed her in constant fear for her safety (*See* Griffin Declaration ¶¶ 27-28). The financial harm and emotional distress resulting from these activities further demonstrate the impact of the racketeering conduct.

COUNT VI – CONSPIRACY TO VIOLATE THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 903) AND RICO ACT (18 U.S.C. § 1962(D))

181. Plaintiff Griffin incorporates by reference all preceding paragraphs as though fully set forth herein.

182. Defendants Seng and Trude conspired with each other and other members of their online network to violate the Pennsylvania Corrupt Organizations Act, 18 Pa.C.S. § 911, and the federal RICO Act, 18 U.S.C. § 1962(d), by agreeing to engage in a pattern of racketeering activity aimed at harming Ms. Griffin and other plaintiffs.

183. The conspiracy included a common plan and purpose to defame, harass, and intimidate Ms. Griffin and others through coordinated efforts involving false statements, threats, and cyber harassment. The Defendants and their associates, such as Queen Bee and @BurntNow, committed numerous overt acts in furtherance of this conspiracy, including:

- **Spreading False and Defamatory Statements:** The Defendants repeatedly disseminated defamatory content about Ms. Griffin and incited others to join in the harassment (*See* Griffin Declaration ¶¶ 6-8, 18, 25).
- **Inciting Followers to Engage in Harassment:** Defendants encouraged their audience to participate in a coordinated campaign of harassment against Ms. Griffin, involving threats, doxxing, and public shaming (*See* Griffin Declaration ¶¶ 13, 15, 16, 24).
- **Disseminating Personal Information:** The conspiracy involved the publication of Ms. Griffin's home address and other personal details, which placed her at risk of physical harm (*See* Griffin Declaration ¶¶ 14, 20-21).

184. Each act committed by the conspirators in furtherance of this unlawful objective constitutes an overt act under Pennsylvania law, 18 Pa.C.S. § 903, and federal law, 18 U.S.C. § 1962(d). The agreement to engage in such criminal conduct and the execution of the coordinated attacks support a claim for conspiracy to violate the Corrupt Organizations Act.

185. The Defendants' statements and actions clearly show an organized and ongoing effort to harm Ms. Griffin and others, revealing the existence of an enterprise engaged in racketeering activity. The conspiracy has caused severe emotional distress, reputational harm, and financial damage to Ms. Griffin (*See* Griffin Declaration ¶¶ 27-28), demonstrating the intent to carry out a pattern of racketeering activity.

VII. **BRITTNEY NICOLE JACKSON AKA "BRITTNEY J"**

**COUNT VII – DEFAMATION AND INTENTIONAL INFILCTION OF
EMOTIONAL DISTRESS AGAINST BRITTNEY NICOLE JACKSON (42
P.A.C.S. § 8343, PENNSYLVANIA COMMON LAW)**

186. Plaintiff Brittney Nicole Jackson incorporates by reference all preceding paragraphs as though fully set forth herein. A true and correct copy of the Sworn Declaration of Brittany Nicole Jackson, a/k/a Brittany J, is attached hereto as Exhibit 59 and incorporated by reference herein.

187. As detailed in the Jackson Declaration, Defendants Jessica Lynne Seng, known as "Granny's Watching," and her associates engaged in a relentless campaign of defamation and emotional abuse against Ms. Jackson. This campaign has not only torn apart Ms. Jackson's professional life but has deeply affected her personal life, causing profound emotional and psychological harm (Jackson Declaration ¶¶ 2-3).

188. The Defendants' defamatory statements, including calling Ms. Jackson a "lazy wasteful piece of shit," were not isolated incidents but part of a pattern of ongoing public defamation aimed at discrediting her and causing reputational damage (Jackson Declaration ¶¶ 4, 6-7). These statements, made publicly before large audiences, have caused Ms. Jackson severe humiliation, distress, and loss of credibility, fulfilling the requirements for defamation *per se* under Pennsylvania law, 42 Pa.C.S. § 8343.

189. Defendant Seng also made public insinuations that Ms. Jackson neglected or endangered her children, such as suggesting, "You won't ever catch me driving with my children unbuckled standing up." These statements directly attacked Ms. Jackson's character as a mother and were intended to discredit her parental fitness, causing significant emotional harm and fear (Jackson Declaration ¶¶ 8-9).

190. The extreme and outrageous conduct of Defendants Seng and her associates in perpetuating these defamatory remarks constitutes intentional infliction of emotional distress under Pennsylvania common law. The repeated, public nature of the attacks, aimed at a mother protecting her children, was done with reckless disregard for the emotional impact on Ms. Jackson (Jackson Declaration ¶¶ 5, 12-14, 17).

191. Ms. Jackson's emotional suffering has been profound, manifesting in anxiety, fear, and mental health deterioration due to the persistent harassment. Her children have also been affected, as Ms. Jackson has had to explain the public nature of the attacks to them, disrupting their sense of security (Jackson Declaration ¶¶ 5, 7-8, 14).

**COUNT VIII – HARASSMENT AND CYBER HARASSMENT AGAINST
BRITTNEY NICOLE JACKSON (18 PA.C.S. § 2709, 18 PA.C.S. § 2709(B.1),
47 U.S.C. § 223)**

192. Plaintiff Jackson incorporates by reference all preceding paragraphs as though fully set forth herein.

193. Defendants Seng and her followers have engaged in repeated acts of harassment and cyber harassment aimed at intimidating Ms. Jackson. Seng's statements, such as "I will make you a fucking victim," constitute explicit threats designed to instill fear, in violation of 18 Pa.C.S. § 2709 (Jackson Declaration ¶¶ 4, 16). The repeated nature of the threats, combined with public dissemination, demonstrates a clear pattern of conduct intended to cause emotional distress and fear.

194. The harassment also constitutes cyber harassment under 18 Pa.C.S. § 2709(b.1) and federal law, 47 U.S.C. § 223, as Seng utilized online platforms to

spread defamatory content and incite others to join in the harassment campaign. This persistent harassment extended beyond direct statements and threatened Ms. Jackson's safety (Jackson Declaration ¶¶ 2, 8-9, 12, 21).

195. Ms. Jackson's mental health and emotional stability have been significantly affected by the harassment, resulting in sleepless nights and constant anxiety about potential real-world violence. The continuous nature of the threats exacerbated these effects and disrupted her ability to live a normal life (Jackson Declaration ¶¶ 5, 9, 21).

COUNT IX – INTERFERENCE WITH PROSPECTIVE BUSINESS RELATIONS AND ECONOMIC DAMAGES (RESTATEMENT (SECOND) OF TORTS § 766, 42 P.A.C.S. § 8343)

196. Plaintiff Jackson incorporates by reference all preceding paragraphs as though fully set forth herein.

197. The Defendants' defamatory and harassing actions extended to intentionally disrupting Ms. Jackson's business relationships and professional opportunities. As a result, individuals and entities who once trusted Ms. Jackson have distanced themselves, causing her to lose significant business opportunities and income (Jackson Declaration ¶¶ 10-11, 18).

198. Defendants acted with improper motives, aiming to damage Ms. Jackson's ability to support herself and her children through malicious statements and defamatory campaigns. This interference with business relationships constitutes tortious conduct under Restatement (Second) of Torts § 766, as it hindered Plaintiff's ability to pursue professional engagements (Jackson Declaration ¶¶ 10-12).

199. Ms. Jackson has suffered economic harm as a direct consequence of the harassment and defamation, including lost income and damage to her professional reputation. These financial losses have exacerbated the emotional toll of the ongoing attacks (Jackson Declaration ¶¶ 11, 18).

COUNT X – VIOLATION OF THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 911) AND RICO ACT (18 U.S.C. § 1962)

200. Plaintiff Jackson incorporates by reference all preceding paragraphs as though fully set forth herein.

201. The Defendants, including Seng and her associates, engaged in a pattern of racketeering activity through an enterprise comprising coordinated and continuous acts of harassment, defamation, and intimidation against Ms. Jackson. These activities constitute violations of the Pennsylvania Corrupt Organizations Act, 18 Pa.C.S. § 911, and the federal RICO Act, 18 U.S.C. § 1962, which prohibit enterprises from engaging in a pattern of racketeering activity (Jackson Declaration ¶¶ 2-3, 18).

202. The enterprise involved multiple actors working in concert to harm Ms. Jackson through related acts of cyber harassment, defamation, and threats. The goal was to further the enterprise's unlawful objectives by discrediting and inflicting harm on Ms. Jackson, which constitutes a pattern of racketeering activity under state and federal law (Jackson Declaration ¶¶ 4-5, 8-9, 13).

203. The Defendants' coordinated actions included encouraging others to join in the harassment campaign, spreading false statements about Ms. Jackson's character, and making public threats. Each act in furtherance of the enterprise

supported the organized criminal conduct, in violation of 18 Pa.C.S. § 911(e) and 18 U.S.C. § 1961(5) (Jackson Declaration ¶¶ 14, 24-25).

204. The acts of racketeering caused Ms. Jackson substantial harm, including emotional distress, damage to her reputation, and financial losses. The ongoing nature of the enterprise's attacks demonstrates the continuity and structure necessary to establish a corrupt organization and a pattern of racketeering activity (Jackson Declaration ¶¶ 17-18).

COUNT XI – CONSPIRACY TO VIOLATE THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT AND RICO ACT (18 PA.C.S. § 903, 18 U.S.C. § 1962(D))

205. Plaintiff Jackson incorporates by reference all preceding paragraphs as though fully set forth herein.

206. Defendants Seng and her associates conspired to violate the Pennsylvania Corrupt Organizations Act and the RICO Act by agreeing to engage in a pattern of racketeering activity that included defamation, harassment, and intimidation directed at Ms. Jackson. This conspiracy involved a common plan to harm Ms. Jackson's reputation, disrupt her life, and incite others to join in these unlawful acts (Jackson Declaration ¶¶ 3, 18).

207. The conspiracy included numerous overt acts in furtherance of this unlawful purpose, such as spreading false and defamatory statements, encouraging followers to participate in harassment, and making public threats. These acts were intended to achieve the conspiracy's goals and caused significant harm to Ms. Jackson (Jackson Declaration ¶¶ 6, 8, 13, 15).

208. The ongoing and coordinated nature of the Defendants' conduct constitutes racketeering activity, as they acted with a shared purpose to inflict

emotional, financial, and reputational harm on Ms. Jackson. The agreement to engage in such criminal behavior supports claims under both 18 Pa.C.S. § 903 and 18 U.S.C. § 1962(d) (Jackson Declaration ¶¶ 2, 4-5, 17-18).

VIII. SETH ROGERS

**COUNT XII – INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS
(IIED)**

209. Plaintiff Seth Rogers repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

210. Defendants Stephanie Jo Trude (BBQ Lady) and Jessica Lynn Seng (Granny's Watching), engaged in a pattern of extreme and outrageous conduct directed at Plaintiff Rogers. This conduct includes spreading false allegations of criminal behavior, such as accusations of pedophilia and involvement in the murder of a child, along with threats to his safety. The Defendants' actions were maliciously intended to harm Rogers emotionally, damage his reputation, and derail the search for his missing son. (Rogers Declaration ¶¶ 7-9, 11-13, 16-17).

211. These actions formed part of a deliberate and concerted campaign to inflict severe emotional distress upon Plaintiff Rogers, who was already suffering from the trauma and pain of his son's disappearance. The Defendants' conduct exceeded all bounds of decency in a civilized society and constituted intentional infliction of emotional distress under Pennsylvania law. (Rogers Declaration ¶¶ 5, 7-9, 16-17).

212. As a direct and proximate result of the Defendants' actions, Plaintiff Rogers has suffered severe emotional distress, including anxiety, fear for his safety,

and significant mental anguish, requiring him to alter his daily activities and impacting his personal and professional life. (Rogers Declaration ¶¶ 8-9, 14, 19).

COUNT XIII – INTERFERENCE WITH EMPLOYMENT RELATIONS

213. Plaintiff Seth Rogers repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

214. Defendants Trude and Seng interfered with Plaintiff Rogers' employment by disseminating dangerous and false accusations that could jeopardize his safety and job security as a deputy sheriff in a maximum-security jail. The malicious rumors of criminal behavior, spread through various online platforms, directly endangered Rogers' life in the workplace. (Rogers Declaration ¶¶ 8-9, 11).

215. The Defendants' actions intentionally interfered with Plaintiff Rogers' employment and created a hostile work environment, constituting a claim for interference with contractual relations or economic advantage under Pennsylvania law. (Rogers Declaration ¶¶ 8-9).

COUNT XIV – CYBER HARASSMENT (18 PA.C.S. § 2709(B))

216. Plaintiff Seth Rogers repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

217. The sustained online attacks by Defendants Trude and Seng, which include spreading false information about Plaintiff Rogers and alleging involvement in criminal activity, amount to cyber harassment under Pennsylvania law. The use of electronic communications to target Rogers with harmful and distressing content, including baseless allegations and threats associated with his son's disappearance, constitutes cyber harassment. (Rogers Declaration ¶¶ 5-8, 11, 14).

218. The Defendants' coordinated efforts to incite harassment against Rogers directly impacted his emotional well-being and safety, satisfying the elements required for a claim of cyber harassment. (Rogers Declaration ¶¶ 5, 8, 11).

COUNT XV – OBSTRUCTION OF JUSTICE (18 PA.C.S. § 5101) AND TAMPERING WITH WITNESSES OR INFORMANTS (18 PA.C.S. § 4952.1)

219. Plaintiff Seth Rogers repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

220. Defendants Trude and Seng engaged in conduct intended to obstruct the search for Sebastian Rogers by misleading authorities, spreading false information, and harassing Plaintiff Rogers to prevent him from searching for answers in his son's disappearance. Their actions hindered the investigation and contributed to an environment of fear and intimidation. (Rogers Declaration ¶¶ 2-5, 10, 14).

221. The actions of Defendants Trude and Seng demonstrate efforts to obstruct justice, with the intention of preventing Rogers from sharing relevant information that could aid in locating Sebastian. (Rogers Declaration ¶¶ 5, 10, 14).

COUNT XVI – ENDANGERING THE WELFARE OF A CHILD (18 PA.C.S. § 4304)

222. Plaintiff Seth Rogers repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

223. By spreading false allegations and obstructing efforts to search for Sebastian, Defendants Trude and Seng endangered the welfare of a child. Their conduct interfered with legitimate efforts to locate the missing boy and deviated from acceptable standards, thus exacerbating the risks to Sebastian's safety and well-being. (Rogers Declaration ¶¶ 7-9, 16-17).

224. Their malicious behavior, including undermining the search efforts and supporting a coordinated campaign to discredit Rogers, constituted willful neglect that contributed to the child's continued risk. (Rogers Declaration ¶¶ 5, 7-8, 16-17).

COUNT XVII – RICO VIOLATIONS (18 U.S.C. § 1962) / PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 911)

225. Plaintiff Seth Rogers repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

226. Defendants Trude and Seng formed an enterprise engaged in a pattern of racketeering activity aimed at discrediting Plaintiff Rogers, obstructing the search for Sebastian, and harming Rogers both personally and professionally. Their conduct included acts of extortion, harassment, witness intimidation, and defamation, constituting a continuous and related pattern of criminal behavior under the RICO Act and Pennsylvania's Corrupt Organizations Act. (Rogers Declaration ¶¶ 7-11, 16-17).

The coordinated activities of Defendants Trude and Seng, aimed at silencing Rogers and derailing the investigation, demonstrate the existence of an enterprise that engaged in multiple predicate acts of racketeering as defined under federal and state law. (Rogers Declaration ¶¶ 4-5, 7-8, 11).

IX. TONY MATHIS

COUNT XVIII – HARASSMENT (18 PA.C.S. § 2709)

227. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

228. Defendant Stephanie Jo Trude, also known as "BBQ Lady," and others have engaged in repeated conduct intended to harass, annoy, or alarm Plaintiff

Mathis, including making explicit statements such as, "It is my [expletive] mission to take Tony the [expletive] down" (Mathis Declaration ¶ 6).

229. The conduct included spreading false and defamatory accusations, including claims of infidelity and other false personal attacks, all intended to damage Mathis's reputation and cause emotional distress (Mathis Declaration ¶¶ 7-8).

230. Under 18 Pa.C.S. § 2709, harassment is defined as engaging in conduct that serves no legitimate purpose with the intent to harass or annoy another person. The actions of Defendant Trude, as described, meet the statutory criteria for harassment.

COUNT XIX – DEFAMATION (42 PA.C.S. § 8343)

231. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

232. Defendant Trude, along with other individuals, made multiple false and defamatory statements about Plaintiff Mathis, including accusations of infidelity and improper personal conduct, which were intended to harm his reputation and cause emotional distress (Mathis Declaration ¶¶ 7-8, 10-11).

233. These false statements were made publicly, with the intent of damaging Plaintiff's reputation, and were spread widely through social media platforms, further exacerbating the harm caused (Mathis Declaration ¶¶ 6-9).

234. Pursuant to 42 Pa.C.S. § 8343, defamation occurs when a statement is false, maliciously made, and injurious to the reputation of the person targeted. Defendant Trude's public comments and actions satisfy these elements.

COUNT XX – CRIMINAL CONSPIRACY (18 PA.C.S. § 903)

235. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

236. Defendant Trude, alongside other individuals, participated in a coordinated conspiracy to engage in unlawful acts such as harassment and defamation against Plaintiff Mathis, as evidenced by statements about an "undercover mission" targeting Mathis and attempts to spread false narratives (Mathis Declaration ¶¶ 8-9, 12-13).

237. The conspiracy was carried out with the intent to harm Mathis's reputation and prevent him from assisting in the search for Sebastian Rogers, thereby obstructing the investigation (Mathis Declaration ¶¶ 12-14).

238. Under 18 Pa.C.S. § 903, criminal conspiracy is established when two or more individuals agree to commit a criminal act and take steps to further that agreement. The actions described indicate an ongoing conspiracy against Mathis.

COUNT XXI – OBSTRUCTION OF JUSTICE (18 P.A.C.S. § 5101)

239. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

240. Defendants, including Trude, deliberately engaged in conduct designed to obstruct the search for Sebastian Rogers by targeting Mathis with false allegations and character attacks that diverted attention away from the search efforts (Mathis Declaration ¶¶ 12-14).

241. These actions were taken with the intent to impair or hinder the lawful efforts to find the missing child and constituted obstruction of justice under Pennsylvania law.

242. Pursuant to 18 Pa.C.S. § 5101, it is a crime to intentionally obstruct the administration of law through deceptive means or threats. The conduct of Defendant Trude and others falls within the statutory definition.

COUNT XXII – INTIMIDATION OF A WITNESS OR VICTIM (18 PA.C.S. § 4952)

243. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

244. Defendants engaged in conduct intended to intimidate and harass Plaintiff Mathis in an effort to prevent him from participating in the investigation and aiding in the search for Sebastian Rogers (Mathis Declaration ¶¶ 6, 8-10).

245. The conduct included making threats and spreading false allegations, which were designed to discourage Mathis from continuing his involvement in the case and to discredit his efforts publicly.

246. Under 18 Pa.C.S. § 4952, it is illegal to use threats, harassment, or intimidation against a witness or individual involved in legal proceedings. The described actions meet these statutory requirements.

COUNT XXIII – VIOLATION OF THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 911) AND RICO ACT (18 U.S.C. § 1962)

247. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

248. Defendant Trude and others engaged in a pattern of unlawful conduct, including harassment, defamation, obstruction of justice, and intimidation, which

targeted Plaintiff Mathis and undermined efforts to locate Sebastian Rogers (Mathis Declaration ¶¶ 8-14).

249. These actions constituted an organized and continuous pattern of criminal activity, intended to harm Mathis and obstruct the investigation into the missing child.

250. Under the Pennsylvania Corrupt Organizations Act, 18 Pa.C.S. § 911, and the federal RICO Act, 18 U.S.C. § 1962, Defendants' acts qualify as a pattern of racketeering activity, involving multiple predicate acts as part of an enterprise aimed at causing harm to Plaintiff and interfering with the search for Sebastian. The predicate acts include:

- **Harassment (18 Pa.C.S. § 2709):** Engaging in repeated acts of intimidation and defamation against Plaintiff Mathis.
- **Defamation (42 Pa.C.S. § 8343):** Spreading false statements that damaged Plaintiff's reputation.
- **Obstruction of Justice (18 Pa.C.S. § 5101):** Taking actions to prevent Mathis from aiding in the investigation.
- **Intimidation of a Witness (18 Pa.C.S. § 4952):** Conduct intended to influence or impede Mathis's participation in the search efforts.

251. These acts demonstrate a pattern of organized, illegal activities that satisfy the requirements for racketeering under both state and federal laws.

COUNT XXIV – STALKING (18 PA.C.S. § 2709.1)

252. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

253. Defendant Trude engaged in repeated acts of harassment and threats against Plaintiff Mathis, including explicitly stating that it was her mission to “take Tony the [expletive] down,” along with numerous other derogatory and defamatory actions (Mathis Declaration ¶¶ 6-8).

254. These actions were part of a deliberate and sustained effort to cause substantial emotional distress to Mathis and disrupt his life, causing him to fear for his safety and the safety of his family (Mathis Declaration ¶¶ 10-11).

255. Under 18 Pa.C.S. § 2709.1, stalking is defined as engaging in a course of conduct that causes fear of bodily injury or substantial emotional distress. The repeated nature of Defendant Trude's conduct, along with her threats and public attacks, meets the statutory elements of stalking.

COUNT XXV – RETALIATION AGAINST A WITNESS OR VICTIM (18 PA.C.S. § 4953)

256. Plaintiff Mathis incorporates by reference all preceding paragraphs as though fully set forth herein.

257. Defendant Trude's campaign of harassment and defamation was carried out in retaliation for Plaintiff Mathis's role as a spokesperson for Seth Rogers and his involvement in the search for Sebastian Rogers (Mathis Declaration ¶¶ 3-5, 8-9).

258. The retaliatory conduct included direct threats, attempts to discredit Mathis publicly, and coordinated efforts to harm his reputation and disrupt the search efforts (Mathis Declaration ¶¶ 6, 8, 12-13).

Pursuant to 18 Pa.C.S. § 4953, retaliation against a witness or victim occurs when a person harms or threatens to harm another individual in retaliation for their participation in a legal process. Defendant Trude's conduct qualifies as retaliation, as

it was intended to intimidate and deter Mathis from continuing his involvement in the case.

X. CHRISTINA O'DONNELL A/K/A "CHASE N CRIME"

**COUNT XXVI – DEFAMATION AND INTENTIONAL INFILCTION OF
EMOTIONAL DISTRESS AGAINST CHRISTINA O'DONNELL (42 PA.C.S.
§ 8343, PENNSYLVANIA COMMON LAW)**

259. Plaintiff Christina O'Donnell incorporates by reference all preceding paragraphs as though fully set forth herein.

260. As detailed in the Christina O'Donnell Declaration, Defendants Stephanie Trude, also known as "BBQ Lady," along with her associates, engaged in a coordinated and malicious campaign of defamation and emotional abuse. Defamatory statements made by Trude and her followers included allegations of criminal behavior, drug abuse, and derogatory attacks on O'Donnell's personal character, professional reputation, and history as a human trafficking survivor (O'Donnell Declaration ¶¶ 3, 11-12, 62-63).

261. The defamatory statements extended beyond mere insults; they involved continuous public accusations that were false, defamatory, and intended to damage O'Donnell's reputation. Remarks included false claims of racism, drug use, and allegations of affairs, all of which were baseless and intended to provoke harassment from Trude's followers (O'Donnell Declaration ¶¶ 23, 108-109, 132-134).

262. These false accusations were designed to incite harassment and public shaming, resulting in substantial emotional distress and professional harm. Trude's tactics included encouraging her followers to harass O'Donnell, both on live streams and through direct messages, where she was attacked based on her recovery,

parenting, physical appearance, and experiences as a trafficking survivor (O'Donnell Declaration ¶¶ 11-13, 69-72, 225).

263. The conduct by Trude constitutes intentional infliction of emotional distress under Pennsylvania law, given the extreme and outrageous nature of the harassment. Trude knowingly exploited sensitive personal details about O'Donnell's past trauma, such as the loss of her child to SIDS and her status as a trafficking survivor, causing severe emotional pain and mental anguish (O'Donnell Declaration ¶¶ 12, 73, 135-137).

COUNT XXVII – HARASSMENT, CYBER HARASSMENT, AND STALKING (18 PA.C.S. § 2709, § 2709.1, § 2709(B.1), 47 U.S.C. § 223)

264. Plaintiff O'Donnell incorporates by reference all preceding paragraphs as though fully set forth herein.

265. Defendants Trude and her followers engaged in repeated acts of harassment, cyber harassment, and stalking, as defined under 18 Pa.C.S. § 2709, § 2709.1, and § 2709(b.1), which criminalize conduct intended to harass, annoy, or alarm another person. This included continuous acts of threatening behavior, doxxing, and direct threats of harm aimed at O'Donnell (O'Donnell Declaration ¶¶ 9, 20-21, 224).

266. The harassment was exacerbated by Trude's efforts to dox O'Donnell, fully aware of her history as a trafficking survivor. Trude's admission to doxing ("We just doxed") demonstrated intent to expose O'Donnell to further risk, knowing the significant danger that revealing her identity posed to her safety (O'Donnell Declaration ¶¶ 20, 137-138).

267. Under Pennsylvania's stalking statute, 18 Pa.C.S. § 2709.1, and federal law, 47 U.S.C. § 223, Trude's conduct meets the criteria for stalking, as she engaged in a repeated course of conduct that placed O'Donnell in reasonable fear of bodily injury. Trude's actions, including incitement to harassment and the publication of O'Donnell's personal information, were intended to intimidate and coerce her (O'Donnell Declaration ¶¶ 224-226).

268. The harassment extended to private messages from Trude's followers encouraging O'Donnell to commit suicide, alongside attacks on her recovery, physical appearance, and traumatic past. These deliberate actions exacerbated O'Donnell's psychological distress and disrupted her ability to function normally in daily life (O'Donnell Declaration ¶¶ 11, 130, 157).

COUNT XXVIII – INVASION OF PRIVACY – PUBLIC DISCLOSURE OF PRIVATE FACTS AND FALSE LIGHT (RESTATEMENT (SECOND) OF TORTS § 652B-D, PENNSYLVANIA COMMON LAW)

269. Plaintiff O'Donnell incorporates by reference all preceding paragraphs as though fully set forth herein.

270. Trude invaded O'Donnell's privacy by publicly disclosing private facts related to her trauma, recovery, and family life. Trude exploited O'Donnell's history as a human trafficking survivor and the loss of her child to humiliate her and provoke public harassment, constituting an invasion of privacy under Pennsylvania law (O'Donnell Declaration ¶¶ 12, 135-136).

271. The disclosure of O'Donnell's traumatic experiences in an exploitative manner placed her in a false light by suggesting she was using these experiences for personal gain. Trude's repeated false accusations, such as labeling O'Donnell a

"couch potato" or "drug addict," portrayed O'Donnell in a highly offensive and misleading manner to the public (O'Donnell Declaration ¶¶ 69-72, 132-134).

272. Trude's invasion of O'Donnell's privacy extended to encouraging the dissemination of misinformation regarding her sobriety and parenting abilities. The deliberate and public nature of these actions caused O'Donnell severe distress and damage to her reputation (O'Donnell Declaration ¶¶ 62, 130, 164).

COUNT XXIX – VIOLATION OF THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 911) AND RICO ACT (18 U.S.C. § 1962)

273. Plaintiff O'Donnell incorporates by reference all preceding paragraphs as though fully set forth herein.

274. Defendants Trude, Seng, and other associates engaged in a pattern of racketeering activity through an enterprise that systematically targeted O'Donnell with acts of defamation, harassment, stalking, and invasion of privacy. The enterprise functioned with the common purpose of discrediting O'Donnell, disrupting her life, and inciting further harm from their followers (O'Donnell Declaration ¶¶ 3, 225-228).

275. The repeated acts of doxxing, false accusations, threats, and coordinated harassment constitute a pattern of racketeering activity under both Pennsylvania's Corrupt Organizations Act and the federal RICO Act, 18 U.S.C. § 1962. The continuous nature of these actions demonstrated a structured and organized effort to harm O'Donnell (O'Donnell Declaration ¶¶ 99-101, 153-154, 198-200).

276. The enterprise involved multiple overt acts, such as Trude's admission of doxxing, her followers' coordinated harassment campaigns, and the public

dissemination of defamatory statements. These actions satisfy the requirements for a continuous and related pattern of criminal activity under state and federal law (O'Donnell Declaration ¶¶ 9, 20-21, 119-120).

277. The organized and malicious nature of the enterprise caused O'Donnell substantial harm, including emotional distress, economic loss, and damage to her reputation. The continuous attacks, aimed at exploiting O'Donnell's vulnerabilities and discrediting her publicly, further establish the corrupt nature of the enterprise (O'Donnell Declaration ¶¶ 226-229).

COUNT XXX – CONSPIRACY TO VIOLATE THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT AND RICO ACT (18 PA.C.S. § 903, 18 U.S.C. § 1962(D))

278. Plaintiff O'Donnell incorporates by reference all preceding paragraphs as though fully set forth herein.

279. Trude, Seng, and their network of followers conspired to engage in a pattern of racketeering activity through coordinated harassment, defamation, and intimidation. The conspiracy was designed to exploit O'Donnell's vulnerabilities as a human trafficking survivor and defame her character, causing her significant harm (O'Donnell Declaration ¶¶ 87-88, 225-227).

280. The conspiracy involved overt acts, such as doxxing, public shaming, and disseminating false narratives about O'Donnell. These acts were carried out with a common purpose to intimidate and silence O'Donnell, demonstrating an agreement to violate the Pennsylvania Corrupt Organizations Act and the federal RICO Act (O'Donnell Declaration ¶¶ 28-31, 122-123, 131-135).

281. The conspiracy included Trude's coordinated harassment efforts, which targeted O'Donnell's sobriety, parenting, and past trauma. By manipulating

O'Donnell's history as a trafficking survivor to fuel harassment campaigns, Trude and her associates exploited O'Donnell's most personal and painful experiences to achieve their unlawful objectives (O'Donnell Declaration ¶¶ 12, 135-137).

**COUNT XXXI – RETALIATION AGAINST A VICTIM OR WITNESS (18
P.A.C.S. § 4953)**

282. Plaintiff O'Donnell incorporates by reference all preceding paragraphs as though fully set forth herein.

283. Trude's actions constituted retaliation against O'Donnell for speaking out against bullying and misinformation on her platform. Trude targeted O'Donnell with continuous harassment, defamation, and threats after O'Donnell exposed misinformation and addressed other cases of harassment (Declaration ¶¶ 6-7, 92-93, 100).

284. Trude's retaliation included attempts to silence O'Donnell by doxxing her, inciting her followers to threaten her safety, and spreading false accusations about her personal life. This conduct violated 18 Pa.C.S. § 4953, which prohibits retaliation against victims or witnesses (O'Donnell Declaration ¶¶ 9, 11, 20-21, 138).

285. The retaliatory acts were intended to punish O'Donnell for her advocacy and participation in addressing misinformation, causing her severe emotional distress and placing her at risk of further harm (O'Donnell Declaration ¶¶ 224-228).

XI. JULIA VALENTI

COUNT XXXII – UNLAWFUL DISSEMINATION OF PERSONAL INFORMATION (18 PA.C.S. § 3131)

286. Plaintiff Valenti incorporates by reference all preceding paragraphs as though fully set forth herein. A true and correct copy of the Sworn Declaration of Julia Valenti is attached hereto as Exhibit 61 and incorporated by reference herein.

287. Defendant Seng knowingly disseminated personal information regarding Plaintiff Valenti's mother, including her full name and place of employment, through a publicly accessible platform, as evidenced by Seng's actions in revealing the school website where Valenti's mother works as a teacher (Valenti Declaration ¶ 10).

288. The dissemination of this personal information was made with the intent to harass or intimidate Plaintiff Valenti and her family. Seng's exposure of this private information placed Valenti's mother and family at risk of harassment and harm.

289. Pursuant to 18 Pa.C.S. § 3131, it is unlawful to disseminate personal information with the intent to harass, alarm, or cause distress. Seng's actions meet this statutory definition and contributed to the overall pattern of harassment against Valenti and her family.

COUNT XXXIII – THREATS AND INTIMIDATION (18 PA.C.S. § 2706)

290. Plaintiff Valenti incorporates by reference all preceding paragraphs as though fully set forth herein.

291. Defendant Seng engaged in repeated communications that included direct and implied threats to Plaintiff Valenti's safety, including attacks on her

professional integrity, claims of fraudulent behavior, and insinuations of harm to her personal life and career (Valenti Declaration ¶¶ 17-18).

292. These threats were made with the intent to terrorize or intimidate Valenti, causing her to reasonably fear for her personal safety and that of her family. These threats exacerbated Valenti's preexisting condition of C-PTSD, which worsened due to the continuous nature of the threats.

293. Under 18 Pa.C.S. § 2706, it is illegal to communicate threats intended to terrorize another or to cause reasonable fear of harm. Seng's conduct in targeting Valenti with these repeated threats satisfies the statutory requirements.

COUNT XXXIV – CRIMINAL CONSPIRACY (18 PA.C.S. § 903)

294. Plaintiff Valenti incorporates by reference all preceding paragraphs as though fully set forth herein.

295. Defendant Seng, alongside other individuals including Queen Bee, Jay is 4 Justice, and Clueminatti, participated in a coordinated conspiracy to harass and defame Plaintiff Valenti, as described in the Valenti Declaration (¶¶ 12, 16, 19).

296. The conspiracy involved a collective effort to spread false accusations, dox Valenti's family members, and incite harassment by encouraging their followers to engage in these unlawful acts. This conspiracy was designed to damage Valenti's professional reputation and harm her personally and financially.

297. Pursuant to 18 Pa.C.S. § 903, criminal conspiracy is established when two or more individuals agree to commit an unlawful act and an overt act is taken in furtherance of that agreement. In this case, Seng and her co-conspirators took multiple overt actions, including the spreading of false claims and the organized

harassment of Valenti across various social media platforms (Valenti Declaration ¶¶ 6-10, 12, 16).

COUNT XXXV – VIOLATION OF THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 911) AND RICO ACT (18 U.S.C. § 1962)

298. Plaintiff Valenti incorporates by reference all preceding paragraphs as though fully set forth herein.

299. Defendants engaged in a pattern of racketeering activity that included harassment, defamation, the unlawful dissemination of personal information, and conspiracy, which targeted Plaintiff Valenti and caused significant harm to her professional career, reputation, and personal safety (Valenti Declaration ¶¶ 16-19).

300. The Defendants formed an enterprise, comprising Seng, Queen Bee, Clueminatti, and others, which was organized for the purpose of committing repeated acts of harassment, defamation, and unlawful activity. This enterprise operated across multiple social media platforms and engaged in a coordinated and structured plan to harm Valenti and others associated with her (Valenti Declaration ¶¶ 16-19).

301. Pursuant to the Pennsylvania Corrupt Organizations Act, 18 Pa.C.S. § 911, and the federal RICO Act, 18 U.S.C. § 1962, it is unlawful to engage in a pattern of racketeering activity as part of an enterprise. Defendants' repeated criminal acts, including doxxing, defamation, and harassment, formed a continuous and structured pattern of racketeering activity intended to damage Plaintiff Valenti's professional reputation, safety, and personal life.

302. The enterprise committed multiple predicate acts, including:

- **Harassment (18 Pa.C.S. § 2709):** Defendants engaged in continuous and targeted harassment directed at Valenti, which resulted in significant emotional distress and professional harm.
- **Defamation (42 Pa.C.S. § 8343):** Defendants made false statements about Valenti's professional qualifications and personal integrity, which severely damaged her reputation.
- **Unlawful Dissemination of Personal Information (18 Pa.C.S. § 3131):** Defendants disclosed personal and private information about Valenti's family with the intent to intimidate and harass her.
- **Criminal Conspiracy (18 Pa.C.S. § 903):** Defendants worked in concert to commit unlawful acts against Valenti, including harassment, defamation, and the spreading of false information.

303. These acts collectively demonstrate a continuous and organized pattern of criminal behavior that qualifies as racketeering under both Pennsylvania and federal law.

XII. HONG XIE

COUNT XXXVI – RACKETEERING INFLUENCED AND CORRUPT ORGANIZATIONS ACT (RICO) / PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 911)

304. Plaintiff Hong Xie repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

305. Defendants Trude and Seng, in conjunction with other known personalities and online creators, formed an enterprise with a common goal of obstructing the search for Sebastian Rogers, spreading misinformation, and

damaging the reputations of those involved in the investigation. The coordinated acts of harassment, defamation, intimidation, and dissemination of false information constitute a pattern of racketeering activity under RICO and the Pennsylvania Corrupt Organizations Act. (Xie Declaration ¶¶ 8-11, 17-19, 23).

306. The Defendants' actions included efforts to derail legitimate search efforts, intimidate witnesses, and manipulate public perception through social media and other online platforms. Their acts of extortion, false statements, and threats against those involved in the search, including Plaintiff Xie, satisfy the elements required for establishing a RICO claim. (Xie Declaration ¶¶ 8-9, 17-19, 24-26).

307. As a result of Defendants Trude and Seng's conduct, Plaintiff Xie has suffered significant harm to his reputation, professional relationships, and the ongoing search for Sebastian has been materially obstructed. (Xie Declaration ¶¶ 19, 23, 27).

COUNT XXXVII – STALKING (18 PA.C.S. § 2709.1)

308. Plaintiff Hong Xie repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

309. Defendants Trude and Seng engaged in a course of conduct or repeatedly committed acts toward Plaintiff Xie, including the dissemination of misinformation, harassment, and intimidation, which served no legitimate purpose and caused him emotional distress. The incident at Plaintiff Xie's residence, involving a suspicious vehicle and person, is part of an ongoing pattern of intimidation and stalking intended to threaten and harass him. (Xie Declaration ¶¶ 8, 20-22).

310. The Defendants' actions and threats created a reasonable fear for Plaintiff Xie's safety, and such conduct is defined as stalking under Pennsylvania law. (Xie Declaration ¶¶ 19, 23, 25-26).

COUNT XXXVIII – CYBER HARASSMENT OF A CHILD (18 P.A.C.S. § 2709(B.1))

311. Plaintiff Hong Xie repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

312. Defendants Trude and Seng, along with other online personalities, engaged in cyber harassment directed at those involved in the search for Sebastian, a vulnerable 15-year-old boy. Their coordinated attacks sought to defame and intimidate individuals involved in the search, thereby distracting from efforts to find the missing child and endangering his safety. (Xie Declaration ¶¶ 8-9, 19-21, 23).

313. The malicious spread of misinformation and threats against those working to locate Sebastian Rogers directly endangered the child's welfare and interfered with the legitimate efforts to bring him home safely. (Xie Declaration ¶¶ 16-19, 23, 27).

COUNT XXXIX – OBSTRUCTION OF JUSTICE (18 P.A.C.S. § 5101)

314. Plaintiff Hong Xie repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

315. The actions of Defendants Trude and Seng constituted obstruction of justice by interfering with law enforcement investigations, disseminating false information, and intimidating witnesses, including Plaintiff Xie. Their concerted efforts aimed to derail the investigation into Sebastian Rogers' disappearance, thus obstructing justice under Pennsylvania law. (Xie Declaration ¶¶ 8-11, 16-17, 23).

316. By working in concert with other individuals, including the Proudfoots, and utilizing online platforms to spread misinformation, the Defendants hindered the investigation and impeded Plaintiff Xie's ability to conduct a thorough search and provide necessary support to law enforcement. (Xie Declaration ¶¶ 10-11, 17-19, 24-26).

COUNT XL – HARASSMENT (18 PA.C.S. § 2709)

317. Plaintiff Hong Xie repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

318. Defendants Trude and Seng committed acts of harassment by engaging in a pattern of behavior designed to annoy, alarm, and intimidate Plaintiff Xie. The harassment included false accusations, threats, and defamatory statements made across various platforms, along with targeted efforts to undermine Xie's credibility and obstruct the search for Sebastian. (Xie Declaration ¶¶ 8-9, 16-17, 19, 23, 27).

319. The harassment further extended to orchestrated intimidation efforts at Plaintiff Xie's home, creating fear for his safety and well-being. Such actions meet the statutory definition of harassment under Pennsylvania law. (Xie Declaration ¶¶ 20-22, 24-25).

COUNT XLI – ENDANGERING THE WELFARE OF A CHILD (18 PA.C.S. § 4304)

320. Plaintiff Hong Xie repeats and incorporates by reference all preceding paragraphs as though fully set forth herein.

321. By their coordinated actions to obstruct the search efforts and defame those seeking to locate Sebastian Rogers, Defendants Trude and Seng endangered the welfare of a child. Their tactics actively diverted attention away from legitimate

search efforts and hindered law enforcement's ability to gather information, thereby contributing to the ongoing risk to the missing child's safety. (Xie Declaration ¶¶ 16-19, 23, 27).

322. The Defendants' conduct constituted willful misconduct and gross negligence, further endangering Sebastian's well-being and interfering with efforts to bring him to safety. (Xie Declaration ¶¶ 7-8, 19, 23, 26-27).

XIII. NIK HATZIEFSTATHIOU A/K/A “NIK THE HAT”

COUNT XLII – HARASSMENT (18 PA.C.S. § 2709)

323. Plaintiff Hatziefstathiou incorporates by reference all preceding paragraphs as though fully set forth herein. A true and correct copy of the Sworn Declaration of Nikolaos Tzimas Hatziefstathiou, a/k/a Nik the Hat, is attached hereto as Exhibit 62 and incorporated by reference herein.

324. Defendant Seng, along with other individuals, engaged in repeated acts that served to seriously alarm, annoy, and intimidate Plaintiff Hatziefstathiou, without any legitimate purpose (Hatziefstathiou Declaration ¶¶ 11-12).

325. The harassment included targeted actions such as livestreams encouraging viewers to contact Plaintiff's parole office with false claims, and misrepresenting Plaintiff's comments by twisting them to suggest a threat of violence.

326. Pursuant to 18 Pa.C.S. § 2709, harassment is defined as engaging in a course of conduct that is intended to harass, annoy, or alarm another person. The deliberate and repeated nature of Defendant Seng's conduct meets these statutory requirements.

COUNT XLIII – CRIMINAL CONSPIRACY (18 PA.C.S. § 903)

327. Plaintiff Hatziefstathiou incorporates by reference all preceding paragraphs as though fully set forth herein.

328. Defendant Seng, alongside other individuals, conspired to engage in unlawful conduct, including harassment, defamation, and obstructing Plaintiff's efforts to assist in ongoing investigations (Hatziefstathiou Declaration ¶¶ 10-14, 18).

329. The conspiracy was demonstrated through concerted actions to damage Plaintiff's reputation and credibility, including spreading misinformation and encouraging others to take part in these harmful acts.

330. Under 18 Pa.C.S. § 903, criminal conspiracy occurs when two or more persons agree to commit a criminal act, and an overt act is performed in furtherance of that agreement. The acts taken by Seng and her co-conspirators qualify as an ongoing conspiracy to harm Plaintiff.

COUNT XLIV – OBSTRUCTION OF JUSTICE (18 PA.C.S. § 5101)

331. Plaintiff Hatziefstathiou incorporates by reference all preceding paragraphs as though fully set forth herein.

332. Defendant Seng intentionally engaged in conduct that obstructed, impaired, or perverted the administration of justice by creating barriers that prevented Plaintiff from aiding law enforcement in investigations, including a case involving a missing child (Hatziefstathiou Declaration ¶¶ 14, 18-19).

333. These actions were taken to hinder Plaintiff's participation in investigative efforts, thereby obstructing lawful processes.

334. Pursuant to 18 Pa.C.S. § 5101, it is a criminal offense to intentionally obstruct the administration of law through coercive or other means. Seng's actions meet the statutory requirements of obstruction.

COUNT XLV – INTIMIDATION OF A WITNESS OR VICTIM (18 PA.C.S. § 4952)

335. Plaintiff Hatziefstathiou incorporates by reference all preceding paragraphs as though fully set forth herein.

336. Defendants' conduct, including spreading false allegations and misrepresenting Plaintiff's statements, was aimed at intimidating and deterring Plaintiff from participating as a witness or in assisting law enforcement (Hatziefstathiou Declaration ¶¶ 5-6, 18-19).

337. Such acts sought to undermine Plaintiff's role in ongoing investigations, constituting intimidation under the relevant statute.

338. Under 18 Pa.C.S. § 4952, it is a crime to intimidate a witness with the intent to influence, obstruct, or impede justice. The actions described constitute violations of this law by seeking to hinder Plaintiff's involvement.

COUNT XLVI – DEFAMATION (42 PA.C.S. § 8343)

339. Plaintiff Hatziefstathiou incorporates by reference all preceding paragraphs as though fully set forth herein.

340. Defendants made several false and defamatory statements about Plaintiff, including portraying him as threatening violence and spreading untrue information regarding his professional conduct (Hatziefstathiou Declaration ¶¶ 12, 14-15).

341. These statements were made publicly, with the intent to damage Plaintiff's reputation and credibility.

342. Pursuant to 42 Pa.C.S. § 8343, defamation is established when false, malicious statements injure a person's reputation. Defendants' false accusations satisfy these elements.

COUNT XLVII – VIOLATION OF THE PENNSYLVANIA CORRUPT ORGANIZATIONS ACT (18 PA.C.S. § 911) AND RICO ACT (18 U.S.C. § 1962)

343. Plaintiff Hatziefstathiou incorporates by reference all preceding paragraphs as though fully set forth herein.

344. Defendants participated in a pattern of criminal activity that included harassment, defamation, obstruction of justice, and intimidation targeting Plaintiff (Hatziefstathiou Declaration ¶¶ 10-19).

345. These actions were part of an enterprise aimed at damaging Plaintiff's reputation and hindering his involvement in lawful investigations.

346. Under the Pennsylvania Corrupt Organizations Act, 18 Pa.C.S. § 911, and the federal RICO Act, 18 U.S.C. § 1962, Defendants engaged in activities that constitute a pattern of racketeering, involving multiple predicate acts as part of an organized effort to harm Plaintiff. The predicate acts include:

- **Harassment (18 Pa.C.S. § 2709):** Targeted acts that seriously alarmed and annoyed Plaintiff.
- **Defamation (42 Pa.C.S. § 8343):** False statements intended to injure Plaintiff's reputation.

- **Obstruction of Justice (18 Pa.C.S. § 5101):** Actions taken to prevent Plaintiff's participation in law enforcement efforts.

347. **Intimidation of a Witness (18 Pa.C.S. § 4952):** Conduct aimed at deterring Plaintiff's role in investigative matters.

348. This ongoing pattern of conduct demonstrates a continuous scheme of illegal activities that meet the criteria for violations under both state and federal laws

CONCLUSION

349. For the foregoing reasons, Plaintiffs respectfully request that this Court grant a permanent injunction against Defendants Stephanie Jo Trude and Jessica Lynne Seng, enjoining them from engaging in the unlawful conduct alleged herein. Defendants' continuous and coordinated acts of defamation, harassment, and interference with Plaintiffs' lawful efforts to locate Sebastian Rogers, as well as their obstruction of justice and organized conspiracy to harm Plaintiffs, warrant the Court's intervention to prevent further irreparable harm.

350. The injunctive relief is necessary to protect the Plaintiffs' reputations, professional relationships, safety, and ongoing efforts to locate the missing child, as well as to prevent any future unlawful acts by the Defendants and those acting in concert with them.

RELIEF SOUGHT

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Defendants, granting the following relief:

A) A preliminary injunction:

- 1) Prohibiting Defendants Trude and Seng, as well as any persons or entities acting by, for, or through them, from further disclosing, disseminating, or publicly sharing any private communications involving Plaintiffs or their associates, including but not limited to recordings, live-streams, or related content obtained without the consent of all parties, in violation of the Pennsylvania Wiretap Act (18 Pa.C.S. § 5703).
- 2) Directing Defendants to cease the use of crowdsourcing or fundraising platforms, including but not limited to GoFundMe, CashApp, Venmo, PayPal, Apple Pay, and YouTube “super chats,” to solicit funds for their legal defense or any other purpose related to this litigation. All fundraising efforts must be conducted with full transparency and accuracy regarding the nature of the defense, and Defendants shall be prohibited from making misleading statements about the case
- 3) Prohibiting Defendants Trude and Seng, along with their associates, from making any defamatory or disparaging statements regarding Plaintiffs Seth Rogers, Tony Mathis, AtNight Media LLC, or any other named individuals, whether directly or indirectly, through any platform or medium, to prevent further harm to Plaintiffs'

reputations and emotional distress, as per Pennsylvania defamation law (42 Pa.C.S. § 8343) and harassment statute (18 Pa.C.S. § 2709).

- 4) Directing Defendants Trude and Seng to cease any attempts to portray, disclose, or release the private information, identities, or family details of Plaintiffs and associated individuals, whether through social media, public forums, or any other channels, to protect the safety and privacy of those involved.
- 5) Requiring Defendants Trude and Seng to immediately remove any existing online content, videos, posts, or publications that reference Plaintiffs in a defamatory, harassing, or intrusive manner, and to certify in writing that such content has been permanently removed from all platforms under their control.
- 6) Ordering Defendants Trude and Seng to reimburse Plaintiffs for any costs incurred in addressing or mitigating the harm caused by the Defendants' unauthorized disclosures and defamatory conduct, including but not limited to legal fees, investigative costs, and any necessary remedial actions.
- 7) Mandating that Defendants inform their audiences, including followers, supporters, subscribers, and associates, to cease and desist from all defamatory, harassing, or threatening behavior, and to provide evidence to the Court within 7 days confirming that such instructions have been issued in good faith.

- 8) Granting such other and further preliminary relief as this Honorable Court deems just and appropriate to prevent ongoing and irreparable harm to Plaintiffs.
- B) After trial, a Permanent Injunction:
 - 9) Permanently prohibiting Defendants Trude and Seng from committing any further acts of disclosure, dissemination, or public sharing of private communications involving Plaintiffs or their associates, and from any future violation of the Pennsylvania Wiretap Act (18 Pa.C.S. § 5703).
 - 10) Permanently enjoining Defendants Trude and Seng, as well as any agents, employees, or affiliates acting on their behalf, from making any defamatory or harassing statements regarding Plaintiffs, and from engaging in any conduct intended to harm Plaintiffs' reputations, privacy, or personal safety.
 - 11) Directing Defendants Trude and Seng to return any confidential or private information obtained during the course of their conduct, including but not limited to recordings, messages, or other data related to Plaintiffs, in whatever form it exists, and to certify that no copies or derivatives remain in their possession or control.
 - 12) Barring Defendants Trude and Seng from contacting Plaintiffs or any named individuals in this action, directly or indirectly, through any means, for any purpose other than court-sanctioned communication.

- 13) Mandating that Defendants inform their audiences, including followers, supporters, subscribers, and associates, to cease and desist from all defamatory, harassing, or threatening behavior, and to provide evidence to the Court within 7 days confirming that such instructions have been issued in good faith
- 14) Ordering Defendants Trude and Seng to reimburse Plaintiffs for all costs, expenses, and damages arising from their unlawful conduct, including punitive damages as appropriate for willful and malicious actions.
- 15) Granting such other and further permanent relief as this Honorable Court deems appropriate to fully and finally resolve the matters at issue and to protect Plaintiffs from ongoing harm.

Dated: October 18, 2024

LAW OFFICES OF JOSEPH LESNIAK LLC

JOSEPH P. LESNIAK, ESQUIRE
Counsel for Plaintiffs
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Media, PA 19063
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VERIFICATION

I, HONG XIE, state that I am Managing Partner of ATNIGHT MEDIA, LLC, and can thus state that the facts set forth within the attached COMPLAINT FOR INJUNCTIVE RELIEF, MEMORANDUM IN SUPPORT OF COMPLAINT FOR PRELIMINARY INJUNCTIVE RELIEF AND FINAL INJUNCTIVE RELIEF PETITION are true and correct to the best of my knowledge, information and belief.

This Verification is issued subject to the penalties of the Pennsylvania Criminal Code at 18 Pa. C. S. §4904, relating to unsworn falsification to authorities.


Hong Xie
Managing Partner
Atnight Media, LLC

Date