

UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

PHAEDRA C. PARKS,)

Plaintiff,)

v.)

VIBE HOLDINGS, LLC,)

Defendant.)

Case No. _____

TRIAL BY JURY DEMANDED

COMPLAINT FOR DEFAMATION

COMES NOW Plaintiff, Phaedra C. Parks, and respectfully states her Complaint for Defamation against Defendant, Vibe Holdings, LLC, as follows:

INTRODUCTION

1. This Complaint arises from publication by Defendant of multiple false and defamatory statements of and concerning Phaedra C. Parks.

2. The false and defamatory statements published by Defendant conveyed to the average listener or reader that Plaintiff is a criminal, guilty of active participation in numerous felony crimes.

3. The false and defamatory accusations were published online to generate interest in, and increase sales of, a subsequently published book by Defendant that would repeat and expand on the online statements.

4. The false and defamatory statements were published online to assassinate Plaintiff's character and to impair her future career as an attorney and actor.

5. In publishing the false and defamatory accusations against Plaintiff, Defendant abandoned journalistic integrity and ignored the fundamental canons of journalistic conduct by publishing false and defamatory accusations with actual malice.

6. While Plaintiff recognizes the importance of the role of the media in reporting on public figures, Defendant and other members of the media are not granted an unfettered right or privilege under the First Amendment to defame public figures by publishing false and defamatory accusations with actual malice.

7. As a result of its conduct, Defendant crossed the threshold from speech protected by the First Amendment to enter the arena of actionable defamation of a public figure for which they must be held legally accountable.

PARTIES

8. Plaintiff, Phaedra C. Parks, is an individual who resides in Atlanta, Georgia.

9. Defendant, Vibe Holdings, LLC (“Vibe”), is a corporation organized and existing under the laws of the State of Delaware with its principal place of business being located at 29 East 19th Street, 2nd Floor, New York, NY 10003.

10. Among its corporate activities, Defendant owns, operates, and controls Vibe.com, Uptown Magazine, and Augustus Publishing.

JURISDICTION AND VENUE

11. Plaintiff is a citizen of the State of Georgia for purposes of diversity jurisdiction under 28 U.S.C. § 1332.

12. Defendant is a citizen of Delaware or New York for purposes of diversity jurisdiction under 28 U.S.C. § 1332.

13. This Court has original subject matter jurisdiction of this action pursuant to 28 U.S.C. § 1332 as there exists complete diversity of citizenship between Plaintiff and Defendant and the amount in controversy exceeds Seventy Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

14. All parties are subject to the jurisdiction of this Court pursuant to 28 U.S.C. § 1332.

15. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

FACTUAL BACKGROUND

16. Plaintiff is a respected attorney in Atlanta, Georgia, where she has practiced law for over 13 years.

17. At all times pertinent and relevant to the incidents described in this Complaint, Plaintiff was a licensed attorney in Georgia and a member in good standing of the State Bar of Georgia.

18. In addition to her full-time law practice and work as a television show producer, Plaintiff is also a current co-star of the hit Bravo television show “*Real Housewives of Atlanta*.”

19. Plaintiff is actively involved in philanthropy and community service. She is past President of the Gate City Bar Association and serves on the boards for the Junior League of Atlanta, Atlanta Children’s Shelter, and the Ryan Cameron Foundation. She is also a member of the American Bar Association’s Advisory Board, the University of Georgia’s Donald L. Hollowell Professorship Endorsement Committee, and the University of Georgia’s Law School Alumni Counsel. She is a philanthropic partner with Cool Girls and Jane Fonda’s Georgia Campaign for Adolescent Pregnancy Prevention (G-CAPP).

20. Plaintiff has received numerous recognitions of her work and leadership in the community, including recognition as one of Atlanta’s Top

Women of Influence by the Atlanta Business League (Fall 2010), membership to the Leadership Atlanta Class of 2009, membership to the Outstanding Atlanta Class of 2008, recognition in a feature cover story in *Super Lawyers Magazine* as a “Super Lawyer Rising Star” (Fall 2007), recognition as one of the Top 25 Most Influential Women in *Rolling Out Magazine* (2006), recognition as a “Georgia Rising Star Super Lawyer” in *Atlanta Magazine* (2005), and recognition as an “Attorney of Distinction” in *Jezebel Magazine* (2005).

21. Plaintiff has never been arrested for a crime or charged with any crime.

22. Plaintiff has never been questioned by any law enforcement agency or organization about possible involvement in any crime.

23. Plaintiff married Apollo Nida in November of 2009, and together they have a son, age two.

24. Over the years, Plaintiff has represented numerous celebrity clients in her legal practice.

25. One of Plaintiff’s celebrity clients was an Atlanta rapper known as “Drama.”

26. Plaintiff represented Drama for a probation violation in Clayton County in the Spring of 2000.

27. Around November of 2000 in a telephone conversation, Drama introduced Plaintiff to Angela Stanton, his girlfriend at the time (“Stanton”).

28. While Drama was incarcerated in late 2000 and early 2001, Plaintiff intermittently interacted with Stanton.

29. Upon Drama’s release from jail in approximately January of 2001, Plaintiff had no further communications or interactions with Stanton until approximately July 2004.

30. Around July 2004, Plaintiff represented Stanton on one occasion at a sentence modification hearing.

31. Plaintiff had no interactions with Stanton after the sentence modification hearing in July 2004 until sometime in 2005 when Stanton and/or her brother contacted Plaintiff seeking her assistance to have Stanton transported from prison to her mother’s funeral.

32. Plaintiff has never had any formal or informal employment relationship with Stanton.

33. Plaintiff has never participated in any criminal activities with Stanton.

34. Plaintiff did not socialize with Stanton on any regular basis and does not consider (and never has considered) her to be a close friend or confidant.

35. Stanton is a convicted felon and has served multiple terms in prison.

36. Around February of 2010, Stanton began a personal crusade of false attacks against Plaintiff.

37. Specifically, Stanton began posting false and defamatory accusations about Plaintiff on Twitter and otherwise made false and defamatory statements about her to third persons in the community.

38. In March of this year, Defendant published and promoted Stanton's false and defamatory accusations on the Internet and as a direct result, Stanton's personal and unfounded vendetta against Plaintiff went viral on the Internet.

39. Defendant interviewed Stanton and broadcast her false and defamatory accusations in articles and videos on its websites.

40. Defendant eventually published Stanton's accusations in a book available for online purchase by the public.

41. Defendant's publications of the online interviews and the book concerning Plaintiff imply, as a whole, that Plaintiff is an attorney who has engaged in criminal activity and is worthy of public scorn and contempt.

42. The false statements published by Defendant are defamatory *per se* and damages to the reputation of Plaintiff are presumed as a matter of law.

CAUSE OF ACTION FOR DEFAMATION

43. Plaintiff incorporates by reference paragraphs 1-42 of this Complaint as though the same were set forth herein in their entirety.

The March 14 Articles and Interview

44. On or about March 14, 2012, Defendant published an article entitled, “*‘Real Housewives of Atlanta’ Star Phaedra Parks Exposed!*,” which included a video interview with Angela Stanton. The March 14 article and interview were published at <http://www.vibe.com/article/v-exclusive-real-housewives-atlanta-star-phaedra-parks-exposed> and are still accessible to the public as of the date of the filing of this Complaint. A similar article and video interview were published at <http://uptownmagazine.com/2012/03/author-angela-stanton-reveals-rhoa-phaedra-parks-criminal-past-video/> and are still accessible to the public as of the date of the filing of this Complaint.

45. A true and correct copy of the March 14 articles are attached hereto as Exhibit A and incorporated herein as if set forth in full.

46. In their entirety, the March 14 articles and interview convey a grossly inaccurate and false impression of Stanton’s relationship with Plaintiff.

47. In their entirety, the March 14 articles and interview falsely accuse Plaintiff of being a crooked attorney who knows how to commit crimes, has committed crimes, and knows how to cover up her criminal activity.

48. The March 14 articles and interview in their entirety are false and defamatory *per se* in that they accuse Plaintiff of committing criminal acts.

49. The gist of the March 14 articles and interview is false and defamatory *per se* in that it accuses Plaintiff of committing criminal acts.

50. The March 14 articles and interview include the following false and defamatory statements, which when read in the context of the articles and interview as a whole, convey a false and defamatory impression of Plaintiff:

- “And at that time, they [Phaedra and Apollo] were remaking fraudulent insurance checks. This went on for about two years....”
- “This time she [Phaedra] introduced me to Everett, which is Apollo’s brother,¹ and we were all involved in the federal racketeering scheme against the federal government – stealing Porches, Hummers, Cadillacs, Corvettes, any hot whip at that time – you name it, we had it. We would basically go to the car lot and write down the VIN numbers of the vehicles that we felt as if we wanted to keep or would make a good sale. Once we recorded the numbers down off of the VIN, we would take them back to Phaedra and Everett, and once they had it they would make a fake identification card and a registration card to match the vehicle.”

¹ Defendant retracted and corrected the false statement that Everett was Apollo’s brother in the article available at www.vibe.com, but not in the article available at www.uptownmagazine.com.

- “Phaedra told me that we should proceed with what we had [regarding the vehicle project]. So we left that next morning headed to Tennessee with three of the luxury vehicles, and this is where I was arrested.”

51. The March 14 articles and interview in their entirety constitute libel and/or slander *per se* in that they impute criminal activity to Plaintiff.

52. The March 14 articles and interview in their entirety constitute libel and/or slander *per se* in that they impute actions to Plaintiff that injure her professional business reputation.

53. The March 14 articles and interview in their entirety constitute libel and/or slander *per se* in that they impute actions to Plaintiff that are defamatory and injurious to her reputation on its face and can be so understood without reference to any additional or extrinsic facts.

The March 16 Articles and Interview

54. On or about March 16, 2012, Defendant published an article entitled, “*Real Housewives of Atlanta’ Star Exposed Part II,*” which included a video interview with Angela Stanton. The March 16 article and interview were published at <http://www.vibevixen.com/2012/03/real-housewives-of-atlanta-star-exposed-part-ii-exclusive-statement-from-angela-stanton/> and are still accessible to the public as of the date of the filing of this Complaint. A similar article and interviews were published at <http://uptownmagazine.com/2012/03/author-angela->

[stanton-reveals-her-criminal-involvement-with-rhoas-phaedra-parks-in-a-criminal-enterprise/](#) and are still accessible to the public as of the date of the filing of this Complaint

55. A true and correct copy of the March 16 articles are attached hereto as Exhibit B and incorporated herein as if set forth in their entirety.

56. In their entirety, the March 16 articles and interview convey a grossly inaccurate and false impression of Stanton's relationship with Plaintiff.

57. In their entirety, the March 16 articles and interview falsely accuse Plaintiff of being a crooked attorney who knows how to commit crimes, has committed crimes, and knows how to cover up her criminal activity.

58. The March 16 articles and interview in their entirety are false and defamatory *per se* in that they accuse Plaintiff of professional misconduct and committing criminal acts.

59. The gist of the March 16 articles and interview is false and defamatory *per se* in that it accuses Plaintiff of professional misconduct and committing criminal acts.

60. The March 16 articles and interview include the following statements, which when read in the context of the articles and interview as a whole, convey a false and defamatory impression of Plaintiff:

- “Upon my release, I tried to contact Phaedra several times...couldn’t get in touch with her.”
- “Eventually I was on pretrial release...trying to contact Phaedra...trying to contact Phaedra. She’s not answering the telephone. My family’s trying to find her. I’m going to her office. She’s hiding from me.”
- “Okay so finally, eventually I do get in touch with Phaedra. ‘Don’t worry about it,’ this is Phaedra, ‘I got you, I’m going to take care of you, just remember what we talked about. Let them know I’ll be representing you.’”
- “The day of my arraignment finally comes...she doesn’t show up. When the judge puts in a call for Phaedra, she tells the judge she won’t be representing me due to a conflict of interest.”
- “Maybe she got scared, maybe she thought I would tell. Maybe, you know, she felt that it was just getting too hot. I couldn’t understand why she had just totally and completely abandoned me.”

61. The March 16 articles and interviews in their entirety constitute libel and/or slander *per se* in that they impute criminal activity to Plaintiff.

62. The March 16 articles and interviews in their entirety constitute libel and/or slander *per se* in that they impute actions to Plaintiff that injure her professional business reputation.

63. The March 16 articles and interviews in their entirety constitute libel and/or slander *per se* in that they impute actions to Plaintiff that are defamatory and injurious to her reputation on their face and can be so understood without reference to any additional or extrinsic facts.

The March 19 Article and Interview

64. On or about March 19, 2012, Defendant published an article entitled, “*Real Housewives of Atlanta’ Star Exposed Part III*,” which included a video interview with Angela Stanton. The March 19 article and interview were published at <http://www.vibe.com/article/v-exclusive-real-housewives-atlanta-star-exposed-part-iii> and are still accessible to the public as of the date of the filing of this Complaint.

65. A true and correct copy of the March 19 article is attached hereto as Exhibit C and incorporated herein as if set forth in full.

66. In their entirety, the March 19 article and interview convey a grossly inaccurate and false impression of Stanton’s relationship with Plaintiff.

67. In their entirety, the March 19 article and interview falsely accuse Plaintiff of being a crooked attorney who knows how to commit crimes, has committed crimes, and knows how to cover up her criminal activity.

68. The March 19 article and interview in their entirety are false and defamatory *per se* in that they accuse Plaintiff of professional misconduct and the commission of criminal acts.

69. The gist of the March 19 article and interview is false and defamatory *per se* in that it accuses Plaintiff of professional misconduct and committing criminal acts.

70. The March 19 article and interview include the following statements, which when read in the context of the article and interview as a whole, convey a false and defamatory impression of Plaintiff:

- “It hurt me when I thought about Phaedra, who was somebody who was my friend. When I learned that she went and stood over my mother’s body...and she knew that they were framing me. She knew she had no intention to help me get out of the situation that she had created. Somebody had to be the fall guy for the entire operation and it had to be me.”
- “So my book is not about vengeance, it’s about justice. It’s about telling the story of a...girl...who ran into somebody who pretended to be a friend...who pretended to be a mentor. I just couldn’t understand why she would be so involved with destroying my life, but not interested at all in helping me build it up.”

71. The March 19 article and interview in their entirety constitute libel and/or slander *per se* in that they impute criminal activity to Plaintiff.

72. The March 19 article and interview in their entirety constitute libel and/or slander *per se* in that they impute actions to Plaintiff that injure her professional business reputation.

73. The March 19 article and interview in their entirety constitute libel and/or slander *per se* in that they impute actions to Plaintiff that are defamatory

and injurious to her reputation on their face and can be so understood without reference to any additional or extrinsic facts.

The Book

74. On or about March 19, 2012, Defendant published a book through its wholly owned affiliate, Augustus Publishing, entitled, "*Lies of a Real Housewife: Tell the Truth and Shame the Devil*" ("the book").

75. The book is currently available for download online at <http://www.augustuspublishing.com/digital-books/lies-of-a-real-housewife>. It is not yet available in a print format.

76. A true and correct copy of the book is attached hereto as Exhibit D and incorporated herein as if set forth in its entirety.

77. A true and correct copy of the website promoting the book is attached hereto as Exhibit E and incorporated herein as if set forth in its entirety.

78. In its entirety, the book falsely portrays the relationship between Plaintiff and Stanton as that of friends and accomplices in criminal activity.

79. The book includes numerous statements, which when read in the context of the book as a whole, falsely convey that Stanton and Plaintiff were close friends and accomplices, including, but not limited to, the following statements:

- "This is a true story of my life, and my personal relationship with renowned 'super lawyer' Phaedra Parks. This is the truth behind those lies."

- “Phaedra and I were very close.”
- “Her [Phaedra Parks’] home was like a second home to me.”
- “I remembered the times when Phaedra would pick me up just to ride through the city in one of her expensive cars.”
- “We talked to each other on the phone on a daily basis.”
- “As our relationship continued to grow....”

80. Capitalizing on this false portrayal, the book in its entirety conveys a picture of Plaintiff as a crooked attorney engaged in a multitude of criminal acts, who conspires with Stanton to commit these acts, and who then uses Stanton in an effort to escape criminal liability for those acts.

81. The book includes page after page of statements, which when read together and in the context of the book as a whole, convey a false and defamatory portrait of Plaintiff as a criminal and an unsavory and unprofessional attorney, including, but not limited to, the following statements:

- “Phaedra Parks was a snake I allowed to slither her way into my life. Once she got close enough to bite, she did! As she slithered away, she left me to die a slow and sure death. The heifer never even looked back.”
- “She [Phaedra Parks] walked away from our treasured turned corrupt friendship with not as much as a blemish to her name. To top that, she carried her secret around long enough for the statute of limitations to run out on any criminal or civil charges. She even married our partner in crime so that he could not ever testify against her....”
- “...she had no idea that Drama [Phaedra Parks’ client] had been telling me that he had sex with her also.”

- “Just about every conversation Phaedra and I had would result in her talking about sex. She would often elaborate about her performance of some type of sexual act. Phaedra threw herself at any man she felt she could benefit from, and that was just about any entertainer or athlete who showed interest. She even threw herself at my brother a couple of times. Lee always politely passed on her invites. He said, ‘She’s not my kind of lady...’”
- “She also shared her personal photo album with me. There was [sic] all kinds of pictures of her dressed up as a dominatrix, bent over, and posing in different positions. I was shocked, but it didn’t stop me from looking. Phaedra tripped me out, and I continued viewing the album, but I was mostly in disbelief.”
- “Mystical, if you read this book, you might want to ask Phaedra about your attorney-client privileges. I will not elaborate on too many details for the sake of Mystical, but I would like to say that Phaedra told me that Mystical was guilty, long before he was ever convicted. The hairdresser and those checks, right? Oh Yeah... Yeah, I remember about you and your boys at the hotel.”
- “Phaedra told me that Mystical was the dumbest mother f***** she had ever met in her life. She told me that his hairdresser, a woman that he had known for a long time, stole some checks out of his checkbook, and stole eighty-thousand dollars from him. Instead of calling the police, Mystical called the woman to the hotel under the pretension that he wanted his hair braided. Then he and his entourage, raped the woman, beat her, and sodomized her! Phaedra Parks was absolutely livid.”
- “Our criminal activities began blossoming in 2000. It had been over a year of us feeling each other out. Phaedra was now comfortable enough to bring me into her illegal activities.”
- “Phaedra wanted me to pull a couple of stunts for her. The duties entailed going out, and writing some checks for electronic items. We had orders placed by her family, friends, and or associates to fill.”
- “She went on and on talking about how her criminal enterprise was in full force. The money was rolling in really good, and I was her MVP. She told

me that if I had another baby it would slow down the entire business. Phaedra was right.”

- “March 2001, Phaedra introduced me to her current husband, Apollo Nida. ... About six feet two inches tall.... ... Ironically, he even thought we were all crooks. ... Phaedra told Apollo that I was one of her closest friends, and her best worker. She explained that I had a proven track record, and it was time for my promotion. ... Finally, I was going to make the real money she promised me. No more running around to Best Buy, Staples, Office Depot, or Wal-Mart. I was tired of writing checks. Thus far, I had conducted our scam in every major department store in Atlanta. Therefore in order for me to continue to pull stunts involving writing bogus business checks to fill her daily orders, I would have to extend the boundaries of the operation.”
- “Other than the one time I got caught, and was charged with forgery. Everything Phaedra told me to do so far had led to a smooth ending.”
- “Phaedra assured me that I was only going to get a slap on the wrist. So again, I put my trust in her, and we kept rolling along.”
- “I did exactly as told [by Phaedra and Apollo] and they waited for me outside the airport. ... I was given a folder filled with fake documents. I had in hand, bank statements, a utility bill, and a social security card with a fraudulent Georgia state driver’s license.”
- “My assignment involved, flying to DC, and catching a cab from the airport to Baltimore, MD. Then I was supposed to go to the Department of Motor Vehicles, submit my documents, and obtain my State of Maryland driver’s license.”
- “Phae had specific instructions for me. ‘Take your Maryland drivers license along with this social security printout, and go to the Bank of America, downtown Branch on Peachtree Street and open a bank account,’ Phae said. She also instructed me to deposit money and provide her with the account numbers. Phaedra Parks was about her business, and she did that very well. Later that morning, I left Phaedra’s office on Spring Street. On leaving her office I opened the envelope, and counted the cash. Then I walked a couple blocks over to Peachtree Street.”

- “Once the transaction at the bank was completed, I headed back to Phae’s office, receipt in hand.”
- “While Apollo and I ran the streets, Phaedra was able to sit away behind her desk.”
- “I was a product of Phaedra Parks, and had several identities. ... Like a true mafia outfit, we were operating above the law, and I was in an elite network of workers for Phaedra Parks.”
- “I had money put up and Phaedra kept money on my books. She readily accepted all my phone calls. I also knew that as soon as I touched down, there would be a job waiting for me. With my money up, I called home every single day and made sure money stayed on my books.”
- “Phaedra’s schemes were clever and elaborate. She never ceased to astound each and every time she approached me with an assignment. On numerous occasions, I often found myself excited about learning her tricks of the trade.”
- “Phaedra was this crooked attorney who knew how to commit crimes against the federal government. She also knew how to get away. Phaedra Parks had studied the law extensively, and learned how to manipulate the cracks in the system.”
- “By the time I left that meeting, whew boy, my mind was racing. Phaedra was witty. Her ideas, her brain, and the way she orchestrated things, so clever. ... We were above the law. Hell as far as I was concerned, we were the law. Thanks to you know who.”
- “The first part of my assignment involved scoping out potential vehicles at luxury car dealerships. Each day I simply drove around Atlanta, and the surrounding cities looking for potential prey. Every car lot I visited had several luxury cars. I spotted all of the latest models of Porsche, Mercedes Benz, Hummers, Corvettes, and Cadillac. After selected luxury dealerships were identified, I would then walk around the lots with pen and pad. I casually, but discreetly recorded the VIN numbers, makes, and models of not only the latest, but the hottest whips to hit the city. Once I had the

information recorded, I reported it back to E. We rarely discussed business on the phone. So E and I met daily, and swapped information, and fake documents. It seemed like we never stopped. I provided the VIN numbers, and he gave me the fake identification cards, and fraudulent registration cards matching the vehicles I had previously recorded. At this point, I was handling all of the day-to-day operations.”

- “Phae never had to worry about the illegal side of the operation [of the car scheme]. ... Phae knew as long as I was on the assignment, she would get her money....”
- “With the state issued ID, and proof of ownership, I would be able to visit any other luxury car dealership, provide them with the necessary documents as well as a fee, one hundred and eighty dollars at that time. Then just like that, they would cut a computerized key to the vehicle.”
- “The second part of the scheme involved a late night visit when the dealership closed down. We would return to the dealership and drive away in brand new vehicles, with no disturbances. Even if we did run into a problem such as getting pulled over by the cops, we had all the right paperwork in our possession.”
- “The cars were then sent to a chop shop. The VIN numbers were filed down, and replaced with new ones. Once replaced, I was provided with fraudulent certificates of vehicle titles from the state of Ohio. ... The Ohio titles had to be swapped out for Georgia. No if’s, and’s or but’s about it, that was an important step of the scam.”
- “The vehicles were clean and ready to go. Phaedra firmly insisted we move forward, and proceed as planned with the operation. It was decided that Everett, my cousin, and me would head for Chattanooga, Tennessee, the very next morning with three of the luxury vehicles.”
- “Even though I was tired, I knew we were heading down to Chattanooga, TN. My job was to drive one of our luxury vehicles to the dealership. Then hand them my title, my driver’s license, and my proof of registration when I got there. I was to explain to them that I wanted to trade my expensive car

for a vehicle that was a little less flashy. In return, they would give me a car of lesser value, and also cut a check for the difference.”

- “Still in shock from learning that Everett and Phaedra had sent me back to the same car lot they had just burned, I felt like this was all part of a set up. They had been driven by greed.”
- “I had been in Clayton County Jail for nearly two weeks now, and it seemed like no one could get in touch with Phaedra. She was avoiding every person that tried to contact her on my behalf. All the calls to her personal cellphone and home number went unanswered and were never returned.”
- “I mean, she was all for it when we were doing illegal stuff. ... Why wouldn’t she be all for it when it was something legal and positive? If our relationship had been restricted to boss and worker then I would have had a better understanding. But Phaedra was my friend. She was a godmother to my son Jayvien. She didn’t even give me the honor of sitting down with me to describe my mother’s last day on earth. What had I done to push her so far away? I just couldn’t understand it.”
- “She gave me all the direction in the world when we had illegal dealings, but the rules of the game had changed. I wasn’t privy to the rulebook anymore.”
- “Okay, so Phaedra was a slick bi**h. I knew this because she taught me how to be smooth. Phaedra married Apollo so he couldn’t testify against her....”
- “As I continued to watch the show week after week, I realized that Phaedra never ever had a care in the world for my children or for me. She used me, and she had used my life as a stepping-stone for her own personal greed and gain. She’s such a greedy bi**h!”
- “Phaedra was a genius at creating illusions. She masterminded the perfect crime against the Federal Government, and everybody involved served time in prison, except her.but what about how she used me, and destroyed my life? At the time of our campaign of crimes, she was a sworn officer of the law. She had taken an oath to uphold a certain standard.”

- “Phaedra Parks broke several rules governed by the State Bar of Georgia [Rule 1.2, 4.1, 8.4].”
- “I don’t understand and will never understand how a person sworn to uphold the law could be involved in criminal racketeering schemes which were carried out against the Federal Government and this person continue to practice law in the state.”
- “In exposing Ms. Parks for her wickedness, and showing the world just how much of a snake she really was, I have reclaimed my life.”
- “The enemy [Phaedra Parks] who constantly tried to destroy my life has lost the fight again....”

82. The portrayal of Plaintiff created by the book in its entirety is false and defamatory.

83. The gist of the book, that Plaintiff is a crooked attorney who engages in professional misconduct and a multitude of criminal acts, is false and defamatory.

84. The book in its entirety constitutes libel *per se* in that it imputes criminal activity to Plaintiff.

85. The book in its entirety constitutes libel *per se* in that it imputes actions to Plaintiff that injure her professional business reputation.

86. The book in its entirety constitutes libel *per se* in that it imputes sexual misconduct to Plaintiff.

87. The book constitutes libel *per se* in its entirety in that it imputes actions to Plaintiff that are defamatory and injurious to her reputation on their face and can be so understood without reference to any additional or extrinsic facts.

88. Defendant published the false and defamatory accusations against Plaintiff without any privilege.

89. The false and defamatory accusations against Plaintiff published by Defendant were subsequently republished worldwide on other Internet websites.

PUBLICATION WITH ACTUAL MALICE

90. On March 16, 2012, prior to the publication of the article and interview regarding Parts II and III and the book, L. Lin Wood, on behalf of Plaintiff, sent a letter to Defendant wherein he informed Defendant that the statements by Stanton that they repeatedly had published and planned to continue to publish were false and defamatory. Evidencing a reckless disregard for truth or falsity, Defendant intentionally disregarded and ignored this information. A true and correct copy of the letter of March 16, 2012 is attached hereto as Exhibit F and by reference made a part hereof.

91. On April 27, 2012, L. Lin Wood, on behalf of Plaintiff, sent a letter to Defendant wherein he informed Defendant that the statements by Stanton that they repeatedly had published online in Parts II and III of Stanton's interview and the

accompanying articles and the statements published through Augustus Publishing in the book were false and defamatory. Evidencing a continued reckless disregard for truth or falsity, Defendant intentionally disregarded and ignored this information. A true and correct copy of the letter of April 27, 2012 is attached hereto as Exhibit G and by reference made a part hereof.

92. Prior to the publication, and evidencing a reckless disregard of truth or falsity, Defendant failed and refused to provide Plaintiff with an opportunity to respond to the allegations made against her in the articles, interviews, and the book.

93. Defendant knowingly and purposely avoided and ignored evidence establishing the falsity of the articles, interviews, and the book prior to publishing them.

94. Evidencing a reckless disregard for truth or falsity, Defendant published accusations against Plaintiff that were so inherently improbable on their face as to raise serious doubts about their truth.

95. Evidencing a reckless disregard for truth or falsity, Defendant published accusations against Plaintiff that were so outrageous on their face as to raise serious doubts about their truth.

96. Evidencing a reckless disregard for truth or falsity, Defendant published accusations against Plaintiff that clearly contradicted known facts.

97. Evidencing a reckless disregard for truth or falsity, Defendant published accusations against Plaintiff based solely on a source who was a known convicted felon.

98. Evidencing a reckless disregard for truth or falsity, Defendant published accusations against Plaintiff based solely on a source who was unreliable, known to be biased against Plaintiff, and known to lack credibility.

99. Evidencing a reckless disregard for truth or falsity, Defendant published accusations against Plaintiff based solely on a source who was known to have a history of engaging in vicious personal attacks against Plaintiff.

100. Prior to the publication of the false and defamatory statements, Defendant had actual knowledge that the criminal activity alleged by Stanton had occurred many years ago and had been thoroughly investigated by law enforcement authorities with no criminal charges being brought against Plaintiff, but with criminal charges being brought against Stanton, which resulted in her incarceration in prison.

101. Evidencing a reckless disregard for truth or falsity, Defendant published accusations against Plaintiff without conducting even a cursory investigation, which failure constitutes gross negligence.

102. Defendant had actual knowledge that the accusations against Plaintiff were false prior to publication.

DAMAGES

103. The false and defamatory articles and book were published to third parties and were, in fact, read by third parties all across the United States.

104. As a direct and proximate result of the defamatory articles and book published by Defendant, Plaintiff's reputation as a person and attorney has been permanently damaged.

105. As a direct and proximate result of the defamatory articles and book published by Defendant, Plaintiff has suffered stress, emotional distress, humiliation, anger, and other mental pain and suffering.

106. As a direct and proximate result of the defamatory articles and book published by Defendant, Plaintiff has suffered public hatred, contempt, scorn, and ridicule.

107. As a direct and proximate result of the defamatory articles and book published by Defendant, Plaintiff has suffered special damages.

108. As set forth above, the defamatory the articles and book published by Defendant are defamatory and libelous *per se* in that they impute criminal activity to Plaintiff and injure her professional business reputation, entitling Plaintiff to presumed damages.

109. Despite having received letters on March 16, 2012 and April 27, 2012 informing Defendant that the statements they published in the articles and the book were false and defamatory and demanding that the statements be retracted and corrected, Defendant has failed to retract or correct its false and defamatory statements.

110. The conduct of Defendant demonstrates willful misconduct and an entire want of care that raises a conscious indifference to consequences.

111. The false and defamatory accusations were published with Constitutional malice thereby entitling Plaintiff to an award of punitive damages.

112. Plaintiff is also entitled to an award of punitive damages from Defendant in order to punish it for its unlawful conduct and to penalize and deter it from repeating such unlawful and egregious conduct.

WHEREFORE, Plaintiff, Phaedra C. Parks, demands:

(a) Trial by jury;

- (b) That judgment be entered against Defendant for compensatory damages in an amount not less than Five Million Dollars (\$5,000,000.00);
- (c) That judgment be entered against Defendant for punitive damages in an amount not less than Twenty-Five Million Dollars (\$25,000,000.00) to punish and penalize Defendant and deter Defendant from repeating this unlawful conduct;
- (d) That Defendant publish a retraction of the articles and book;
- (e) That all costs of this action be assessed against Defendant; and
- (f) That this Court award such other relief as it deems equitable, just, and proper.

Respectfully submitted this 22nd day of May 2012.

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