

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Curtis Kin

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CHRIS NELSON, an individual,

Plaintiff,

v.

PHOEBE BRIDGERS, an individual; and
DOES 1 to 10, inclusive,

Defendants.

Case No. 21STCV35635

**PLAINTIFF CHRIS NELSON'S VERIFIED
COMPLAINT FOR:**

- 1. DEFAMATION PER SE**
- 2. DEFAMATION PER QUOD**
- 3. FALSE LIGHT**
- 4. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS**
- 5. INTENTIONAL INTERFERENCE WITH
PROSPECTIVE ECONOMIC RELATIONS**
- 6. NEGLIGENT INTERFERENCE WITH
PROSPECTIVE ECONOMIC RELATIONS**
- 7. INJUNCTIVE RELIEF**

Plaintiff CHRIS NELSON ("Plaintiff") alleges as follows:

PARTIES

1. Plaintiff CHRIS NELSON is and was at all times relevant herein a citizen of the state of California and residing in the County of Los Angeles.

2. Defendant Phoebe Bridgers ("Bridgers") is and was at all times relevant herein a musician based out of Los Angeles, California.

3. Plaintiff is unaware of the true names and capacities of DOES 1 through 10, inclusive,

1 (hereinafter collectively referred to along with Bridgers as “Defendants”) and accordingly, sues said
2 defendants by such fictitious names. Plaintiff is informed and believes, and thereon alleges, that each
3 of said defendants is, in some fashion, responsible for the activities and actions herein alleged. When
4 the true names and capacities of such fictitiously named defendants are ascertained, Plaintiff will
5 amend this Complaint to allege the same.

6 4. Plaintiff is informed and believe, and thereon alleges, that each defendant named in
7 this action, at all relevant times were the agents, ostensible agents, servants, employees,
8 representatives, associates, alter egos, and/or co-conspirators of each of the other Defendants and
9 were at all times acting at least in part within the course scope of his, her, or its authority as agents,
10 ostensible agents, servants, employees, representatives, assistants, associates, and/or alter egos, with
11 the authorization, consent, permission and/or ratification of each of the other Defendants.

12 **JURISDICTION AND VENUE**

13 5. This Court has jurisdiction over this action inasmuch as the intentional acts committed
14 against Plaintiff by defendants Bridgers and Does occurred in the County of Los Angeles and caused
15 damage to Plaintiff in an amount that exceeds the jurisdictional minimum of this Court.

16 6. Venue is proper because the facts and circumstances giving rise to the claims alleged
17 herein and this matter occurred within the County of Los Angeles, California.

18 **FACTUAL BACKGROUND**

19 7. Plaintiff Chris Nelson is a well-established record producer, musician, and
20 businessman.

21 8. Plaintiff owns and operates Sound Space, a recording studio located in downtown Los
22 Angeles, which offers both a creative and comfortable environment, complemented by some of the
23 best recording equipment and musical instruments ever made. Numerous well-known artists and
24 musicians have worked with Plaintiff or worked at Sound Space.

25 9. Plaintiff strives to promote diversity in music and intentionally seeks to work with
26 people of color, women, and members of the LGBTQ community on music projects in order to
27 provide equal opportunities to all musicians regardless of race, ethnicity, gender, or sexual
28 orientation.

1 10. Plaintiff is also a respected expert musical instrument collector, distributor and re-
2 seller of new, used, and vintage musical instruments and recording equipment. Plaintiff's inventory
3 has included hundreds of musical instruments and guitars worth millions of dollars. Plaintiff's
4 expertise in evaluating highly collectible guitars is sought by collectors and musical instrument
5 collectors alike across the United States and abroad. Plaintiff has sold millions of dollars' worth in
6 collectible musical instruments and recording equipment on Reverb.com, the largest online
7 marketplace dedicated to buying and selling new, used, and vintage musical instruments and
8 recording equipment. Plaintiff maintained a monthly average of \$58,000 worth of musical equipment
9 sales on Reverb.com over the majority of his five-year tenure on Reverb.com, achieving over
10 \$100,000 a month on some occasions (e.g., \$102,663 in August 2020). From July 2020 through
11 September 2020, Plaintiff had average sales of approximately \$75,810 per month on Reverb.com.

12 11. Plaintiff has completed over 2,000 successful transactions of musical equipment sales
13 on Reverb.com, maintaining a near perfect 99.99% 5-star rating with over 1,400 reviews being given
14 to Plaintiff by well-versed buyers, other experts and collectors of musical instruments, and others.

15 12. Defendant Bridgers is a singer, songwriter, and guitarist. Her records involve Harrison
16 Whitford, who is her guitarist, and Marshall Vore, who is her drummer. In addition to her work as a
17 solo musician she also has membership in the musical group Better Oblivion Community Center with
18 Conor Oberst.

19 13. Plaintiff first learned about defendant Bridgers through her drummer, Marshall Vore.
20 Plaintiff is informed and believes that defendant Bridgers had a prior relationship with Mr. Vore and
21 that Mr. Vore started dating defendant Bridgers when Bridgers was in her teens.

22 14. Defendant Bridgers is a social advocate. Among other things, in approximately 2019,
23 she detailed multiple accounts of alleged abuse by Ryan Adams, a singer-songwriter and record
24 producer. Defendant Bridgers was interviewed by the New York Times in connection with her
25 allegations of emotional abuse by Mr. Adams. Following her interview, she released the following
26 statement on her personal Instagram for which her handle at the time was "@phoebebridgers":

27 ///

28 ///



41,618 likes

phoebebridgers it's been a weird week and i wanted to say a couple things.

Thank you from my whole fucking heart to my friends, my bands, my mom. They all supported and validated me. They told me that what had happened was fucked up and wrong, and that i was right to feel weird about it. I couldn't have done this without them.

Ryan had a network too. Friends, bands, people he worked with. None of them held him accountable. They told him, by what they said or by what they didn't, that what he was doing was okay. They validated him. He couldn't have done this without them.

Guys, if your friend is acting fucked up, call them out. If they're actually your friend, they'll listen. That's the way this all gets better.

[View all 1,273 comments](#)

maggierogers 💙💙💙

julienrbaker I love you Phoebe's ❤️

February 16, 2019

15. Over the course of Plaintiff and defendant Bridgers' friendship, Bridgers made several comments to Plaintiff concerning things that her drummer, Mr. Vore, did, including the fact that while he was in his thirties, he dated Zoe Donahue, who was 18 years-old at the time, and also encouraged Ruby Henley, 19 years-old at the time, to move in with him. Although defendant Bridgers expressed concern to Plaintiff about Mr. Vore's history with dating and/or pursuing teenage girls, defendant Bridgers, never made any public comments about Mr. Vore.

16. Plaintiff and defendant Bridgers, who is a musician, never worked together in any capacity. Rather, in or around 2018, Plaintiff and his girlfriend at the time, Emily Bannon ("Bannon"), began having consensual sexual encounters with defendant Bridgers, which generally involved unprotected penetrative, oral, and anal sex. The sexual encounters were occasioned by Bannon and Bridgers:



17. On or around September 2, 2019, Plaintiff, defendant Bridgers, and Bannon celebrated what defendant Bridgers called their “fuckiversary”:



1 18. Plaintiff is informed and believes that defendant Bridgers had a prior sexual
2 relationship with Bannon. Shortly after Plaintiff's relationship with Bannon began, it was revealed
3 that defendant Bridgers, Bannon, and Bridgers' boyfriend at the time Conor Oberst were having a
4 relationship. Based upon information and believe, this relationship occurred while Bannon was in a
5 relationship with defendant Bridgers' drummer, Harrison Whitford, who was unaware of the
6 relationship between Bannon and defendant Bridgers.

7 19. Plaintiff is informed and believes that defendant Bridgers and Bannon continued their
8 relationship even after Plaintiff and Bannon's relationship ended in or around the fall of 2019. In
9 December 2019, defendant Bridgers posted the following photograph on her Instagram:

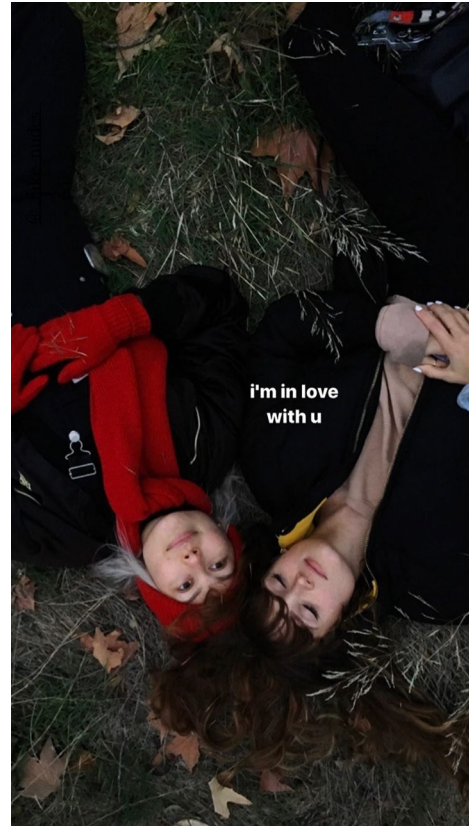


24 20. Defendant Bridgers also brought Bannon as her date to the 2019 GQ Men of the Year
25 party and posted a photograph with her and Bannon with the text "I am in love with you":

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21. In approximately March 2020, Bannon wrote Plaintiff an email stating: “She [Phoebe] and I still love each other endlessly, as we did before I knew you and as we will into the foreseeable future...”

22. In or around October 2020, defendant Bridgers published false and misleading statements about Plaintiff on her public Instagram account, “@_fake_nudes,” stating: “I witnessed and can personally verify much of the abuse (grooming, stealing, violence) perpetuated by Chris Nelson, owner of a studio called Sound Space....”

23. Defendant Bridgers intentionally directed the public to Bannon’s public Instagram account by publishing a post stating, “For anyone who knows [Plaintiff], is considering working with him, or wants to know more, there is an articulate and mind blowing account on @emilybannon’s page as a highlight. TRIGGER WARNING for basically everything triggering.”

24. The false and misleading statements about Plaintiff on the Instagram “@emilybannon” included:

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- 1 a. Plaintiff “beat a young Latinx man to death after provoking him with a racial
2 slur”;
- 3 b. Plaintiff “killed the young man”;
- 4 c. Plaintiff “bludgeoned at least one other man with a baseball bat ... and left him
5 to bleed out in an alleyway”;
- 6 d. Plaintiff committed racially-motivated hate crimes, including “intentionally
7 rear-end drivers of color and then challenging them to call the police, knowing that his white
8 privilege would protect him from any consequences whatsoever but expose his victims to a
9 prohibitive level of risk (of deportation, incarceration, or brutality) by forcing them to interact with
10 cops”;
- 11 e. Plaintiff “defrauded [a] neighbor out of an estimated \$100,000-\$130,000”;
- 12 f. Plaintiff “forging [the neighbor’s] signature and then stealing \$50,000 from”
13 the neighbor;
- 14 g. Plaintiff “robbed [a] storage unit of an estimated tens of thousands of dollars of
15 belongings”;
- 16 h. Plaintiff sells stolen gear and “manufactures fake ‘rare’ guitars to defraud
17 collectors and museums ... and uses all manners of devious engineering to trick unwitting ... buyers
18 into paying a premium for modified junk”; and
- 19 i. Plaintiff “was hacking [defendant Bannon] and other women’s email
20 accounts.”

21 25. Defendant Bridgers also shared the defamatory and misleading statements from
22 Bannon’s Instagram account onto her own Instagram, which at the time the defamatory content and
23 statements were published had a following of approximately 500,000 accounts. The defamatory posts
24 were also shared by Bridgers’ guitarist, Harrison Whitford, who is also Bannon’s ex-boyfriend.

25 26. Plaintiff is informed and believes that defendant Bridgers maliciously and
26 intentionally posted the false and defamatory statements about Plaintiff as part of a vendetta to
27 destroy Plaintiff’s reputation that was enflamed by defendant Bridgers and Bannon’s sexual
28 relationship.

27. As a result of defendant Bridgers' conduct, Plaintiff suffered damages in an amount to be proven at trial but no less than \$3,800,000.00.

FIRST CAUSE OF ACTION

(For Defamation Se against All Defendants)

28. Plaintiff realleges and incorporates by reference Paragraphs 1 through 27, inclusive, as if the same were fully set herein.

29. Defendant Bridgers published false, defamatory, and misleading statements about Plaintiff stating, among other things, that she “witnessed and can personally verify much of the abuse (grooming, stealing, violence) perpetuated by Chris Nelson.”

30. These statements were published and shared by defendant Bridgers on her public Instagram account, “@_fake_nudes,” which she owned, operated, and/or controlled.

31. At the time defendant Bridgers published the false and defamatory statements, she had approximately 500,000 followers on her Instagram account.

32. Plaintiff is informed and believes that as part of a revenge vendetta against Plaintiff, which was motivated in part by defendant Bridgers' relationship with Bannon, defendant Bridgers also directed the public to Bannon's public Instagram account by publishing a post stating, "For anyone who knows [Plaintiff], is considering working with him, or wants to know more, there is an articulate and mind blowing account on @emilybannon's page as a highlight. TRIGGER WARNING for basically everything triggering." The posts on Bannon's Instagram account included false and defamatory statements that Plaintiff is a career criminal, murdered a man, commits racially-motivated hate crimes, abuses women, stole hundreds of thousands of dollars, trafficked in stolen or fake goods, committed cybercrimes, and defrauded numerous people. By tagging Bannon's Instagram, defendant Bridgers intended to notify, alert, or otherwise draw these individuals' attention to the false, defamatory, and misleading posts.

33. These statements and posts by defendants were made to persons other than Plaintiff.

34. These statements and posts were reasonably understood by those who heard, read, or saw them as being about Plaintiff, including explicitly referring to Plaintiff by name and his business.

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1 35. Those who heard, read, and/or saw these statements and posts reasonably understood
2 them to mean that Plaintiff had committed abuse, including grooming, stealing, and violence.

3 36. The statements made by defendant Bridgers were false. Plaintiff has not committed
4 abuse, stolen, committed grooming, or committed violence. To the contrary, Plaintiff intentionally
5 seeks to work with people of color, women, and members of the LGBTQ community on music
6 projects in order to provide equal opportunities to all musicians regardless of race, ethnicity, gender,
7 or sexual orientation.

8 37. Defendant Bridgers' statement that she witnessed Plaintiff commit grooming is false
9 and defendant Bridgers knew it was false at the time she posted. Rather, defendant Bridgers had a
10 consensual sexual relationship with Plaintiff and Bannon that was entirely encouraged by both
11 defendant Bridgers and Bannon. For example, on Plaintiff's birthday in September 2019, defendant
12 Bridgers texted Plaintiff: "happy birthday idiot Let's have group sex." Defendant Bridgers also
13 texted Bannon around the same time stating: "Chris is such a catch."

14 38. Defendant Bridgers also texted Plaintiff and Bannon in approximately September 2019
15 stating, "omfg Best fuckiversary EVER," which referenced the start of the consensual relationship
16 between Defendant Bridgers, Plaintiff, and Bannon. For one of Plaintiff's birthdays, defendant
17 Bridgers had her manager, Darin Harmon, personally deliver a large blanket embroidered with an
18 image of Bridgers and Bannon making out in lingerie with the words "Sound Space" written atop.

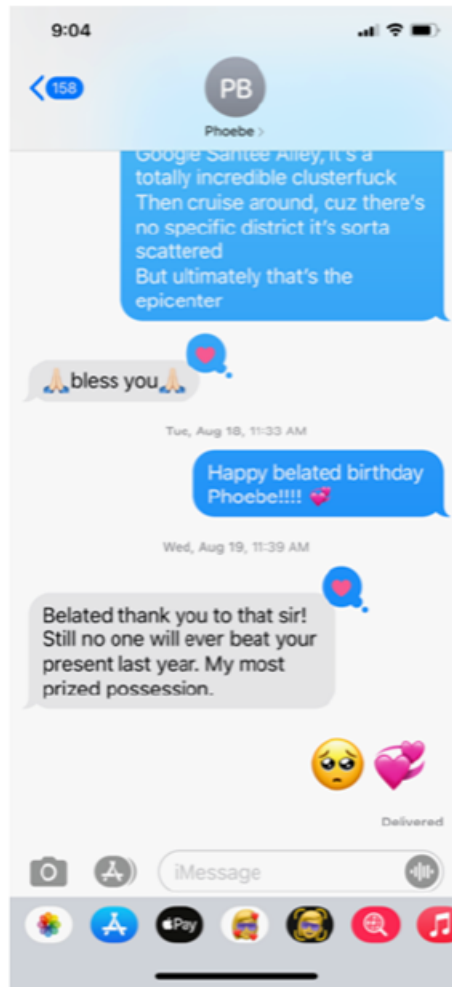
19 39. Defendant Bridgers' statement that she witnessed Plaintiff steal was also false and
20 defendant Bridgers knew it was false at the time she posted it. Defendant Bridgers to the contrary
21 witnessed and experienced the opposite from Plaintiff. On defendant Bridgers' birthday in 2019,
22 Plaintiff gifted her a rare guitar worth thousands of dollars that became one of her most prized
23 possessions. A mere weeks before defendant Bridgers posted the defamatory statements, she sent
24 Plaintiff the following text:

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40. Defendant Bridgers further witnessed Plaintiff lend her his camera to shoot her recent album cover writing, “Thank you so much for letting us (Olaf, Emily, and Phoebe) use your camera!” Defendant Bridgers also witnessed Plaintiff gift Marshall Vore and Harrison Whitford several guitars, percussion, and a synth toy when defendant Bridgers had Plaintiff visit her in the studio. Afterwards, defendant Bridgers texted Plaintiff: “OMG CHRIS... you are too generous.”

41. Defendant Bridgers intentionally made the defamatory statements with knowledge of their falsity and/or had serious doubts about the truth of the statements. After she posted her statements on Instagram, defendant Bridgers admitted to Plaintiff that she knew the statements were false and/or had serious doubts about the truth of the statements. Approximately 24 hours after posting the defamatory statements, defendant Bridgers told Plaintiff at Moon Juice in Silverlake, California that she felt the comments were gray, she had not seen Bannon in months, and she thought Bannon was in rehab for whip-its. Defendant Bridgers stated she wanted to get lunch with Plaintiff

1 and ended the conversation with a hug.

2 42. Plaintiff is informed and believes that defendant Bridgers knowingly and intentionally
3 used her high-profile public platform to disseminate false and defamatory statements concerning
4 Plaintiff in order to damage Plaintiff's reputation. Based upon information and belief, defendant
5 Bridgers posted the false statements to use her social platform and following in order to support
6 Bannon, with whom she had a relationship with:



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21 43. These statements were made without privilege or justification.

22 44. Defendants' publication of these false and defamatory statements was a substantial
23 factor in causing Plaintiff harm including: 1) harm to Plaintiff's property business, trade, profession
24 and/or occupation; 2) expenses that Plaintiff incurred as a result of the statements; 3) harm to
25 Plaintiff's reputation; and 4) shame, mortification, and/or hurt feelings all in an amount according to
26 proof.

27 45. As a result of defendant Bridgers' statements, musicians and artists removed Plaintiff
28 from their projects and stripped Plaintiff of credits that he had obtained in producing their music,

1 including the following:

2 a. In or around January 2021, a musician advised Plaintiff that she could no
3 longer “put this song out. I’m so sorry you’re going through all of the bullshit with Bridgers & your
4 ex. I wish none of this was happening to you, and I’m sorry that our good work can’t come out right
5 now.”

6 b. In or around May 2021, a musician advised Plaintiff that the statements posted
7 by Defendants “interrupted our work.”

8 c. In or around July 2021, a music manager advised Plaintiff that Plaintiff’s
9 credits were removed from materials because they were made “at a point when shit was sketchy.”
10 Plaintiff is informed and believes that this was a direct reference to the defamatory posts made by
11 Defendants, including defendant Bridgers.

12 46. As a result of defendant Bridgers’ conduct, Plaintiff suffered damages in an amount to
13 be proven at trial but no less than \$3,800,000.00.

14 47. Defendants acted with malice, fraud and oppression, and in reckless, willful and
15 conscious disregard for the rights of Plaintiff. Plaintiff is informed and believes that defendant
16 Bridgers intentionally used her high-profile public platform on Instagram to publish false and
17 defamatory statements regarding Plaintiff in order to destroy his reputation and further the personal
18 vendetta that was orchestrated by Bannon as a revenge plot following the end of a romantic
19 relationship. Plaintiff is thus entitled to recovery punitive damages from Defendants in an amount
20 according to proof.

21 **SECOND CAUSE OF ACTION**

22 **(For Defamation Per Quod against All Defendants)**

23 48. Plaintiff realleges and incorporates by reference Paragraphs 1 through 47, inclusive, as
24 if the same were fully set herein.

25 49. Defendant Bridgers published false, defamatory, and misleading statements about
26 Plaintiff stating, among other things, that she “witnessed and can personally verify much of the abuse
27 (grooming, stealing, violence) perpetuated by Chris Nelson.”

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1 50. These statements were published and shared by defendant Bridgers on her public
2 Instagram account, “@_fake_nudes,” which she owned, operated, and/or controlled.

3 51. At the time defendant Bridgers published the false and defamatory statements, she had
4 approximately 500,000 followers on her Instagram account.

5 52. Plaintiff is informed and believes that as part of a revenge vendetta against Plaintiff,
6 defendant Bridgers also directed the public to Bannon’s public Instagram account by publishing a
7 post stating, “For anyone who knows [Plaintiff], is considering working with him, or wants to know
8 more, there is an articulate and mind blowing account on @emilybannon’s page as a highlight.
9 TRIGGER WARNING for basically everything triggering.” The posts on Bannon’s Instagram
10 account included false and defamatory statements that Plaintiff is a career criminal, murdered a man,
11 commits racially-motivated hate crimes, abuses women, stole hundreds of thousands of dollars,
12 trafficked in stolen or fake goods, committed cybercrimes, and defrauded numerous people. By
13 tagging Bannon’s Instagram, defendant Bridgers intended to notify, alert, or otherwise draw these
14 individuals’ attention to the false, defamatory, and misleading posts.

15 53. These statements and posts by Defendants were made to persons other than Plaintiff.

16 54. These statements and posts were reasonably understood by those who heard, read or
17 saw them as being about Plaintiff, including explicitly referring to Plaintiff by name and his business.

18 55. Because of the facts and circumstances known to the readers and/or listeners of the
19 statements, the statements tended to injure Plaintiff in his occupation. Defendant Bridgers
20 intentionally named Plaintiff and his business in her statements and directed anyone working or
21 considering working with him to view the false statements.

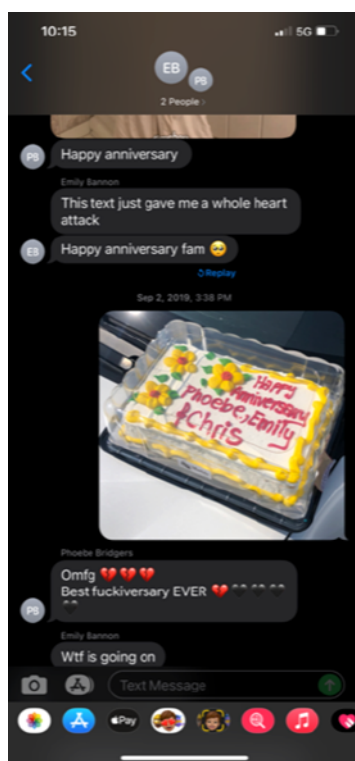
22 56. Because of the facts and circumstances known to the readers and/or listeners of the
23 statements, the statements tended to expose Plaintiff to hatred, contempt, ridicule, and/or shame.

24 57. Because of the facts and circumstances known to the readers and/or listeners of the
25 statements, the statements tended to discourage others from associating or dealing with Plaintiff.

26 58. The statements made by defendant Bridgers were false. Plaintiff has not committed
27 abuse, stolen, committed grooming, or committed violence. To the contrary, Plaintiff intentionally
28 seeks to work with people of color, women, and members of the LGBTQ community on music

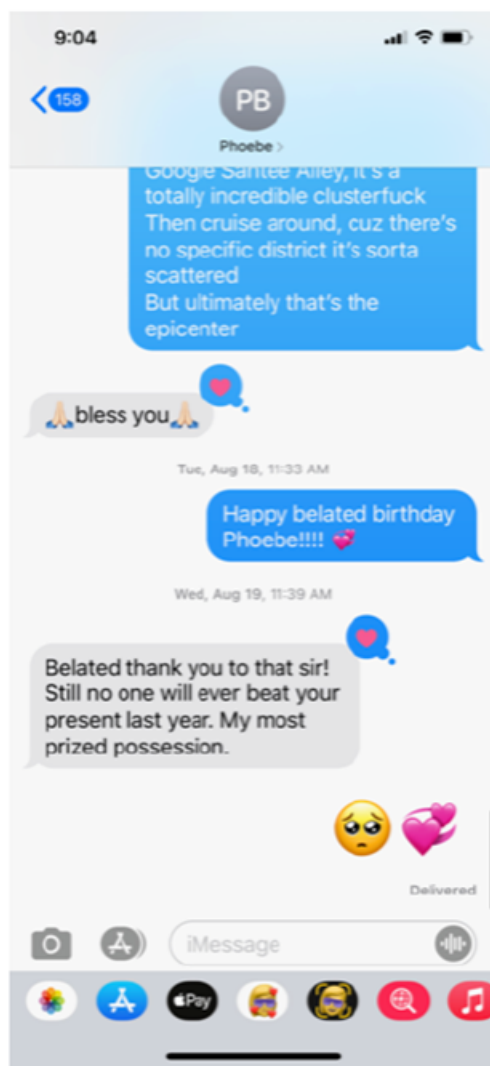
1 projects in order to provide equal opportunities to all musicians regardless of race, ethnicity, gender,
2 or sexual orientation.

3 59. Defendant Bridgers' statement that she witnessed Plaintiff commit grooming is false
4 and defendant Bridgers knew it was false at the time she posted. Rather, defendant Bridgers had a
5 consensual sexual relationship with Plaintiff and Bannon that was entirely encouraged by both
6 defendant Bridgers and Bannon. For example, on Plaintiff's birthday in September 2019, defendant
7 Bridgers texted Plaintiff: "happy birthday idiot Let's have group sex." Defendant Bridgers also
8 texted Bannon around the same time stating: "Chris is such a catch." Defendant Bridgers also texted
9 Plaintiff and Bannon in approximately September 2019 stating, "'omfg Best fuckiversary EVER,"
10 which was in reference to the start of their consensual relationship:



23 60. Defendant Bridgers' statement that she witnessed Plaintiff steal was also false and
24 defendant Bridgers knew it was false at the time she posted it. Defendant Bridgers to the contrary
25 witnessed and experienced the opposite from Plaintiff. On defendant Bridgers' birthday in 2019,
26 Plaintiff gifted her a very rare guitar worth thousands of dollars that became one of her most prized
27 possessions:

28 ///



61. Defendant Bridgers further witnessed Plaintiff lend her his camera to shoot her recent album cover writing, “Thank you so much for letting us (Olaf, Emily, and Phoebe) use your camera!” Defendant Bridgers also witnessed Plaintiff gift Marshall Vore and Harrison Whitford several guitars, percussion, and a synth toy when defendant Bridgers had Plaintiff visit her in the studio. Afterwards, defendant Bridgers texted Plaintiff: “OMG CHRIS... you are too generous.”

62. Defendant Bridgers intentionally made the defamatory statements with knowledge of their falsity and/or had serious doubts about the truth of the statements. After she posted her statements on Instagram, defendant Bridgers admitted to Plaintiff that she knew the statements were false and/or had serious doubts about the truth of the statements.

63. Plaintiff is informed and believes that defendant Bridgers knowingly and intentionally used her high-profile public platform to disseminate false and defamatory statements concerning

1 Plaintiff in order to damage Plaintiff's reputation. Based upon information and belief, defendant
2 Bridgers posted the false statements to use her social platform and following in order to support
3 Bannon, with whom she had a relationship with:



64. These statements were made without privilege or justification.

65. Defendant Bridgers intentionally made the defamatory statements with knowledge of
their falsity and/or had serious doubts about the truth of the statements. After she posted her
statements on Instagram, defendant Bridgers admitted to Plaintiff that she knew the statements were
false and/or had serious doubts about the truth of the statements. Approximately 24 hours after
posting the defamatory statements, defendant Bridgers told Plaintiff at Moon Juice in Silverlake,
California that she felt the comments were gray, she had not seen Bannon in months, and she thought
Bannon was in rehab for whip-its. Defendant Bridgers stated she wanted to get lunch with Plaintiff
and ended the conversation with a hug.

66. Defendants' publication of these false and defamatory statements was a substantial
factor in causing Plaintiff harm including: 1) harm to Plaintiff's property business, trade, profession

1 and/or occupation; 2) expenses that Plaintiff incurred as a result of the statements; 3) harm to
2 Plaintiff's reputation; and 4) shame, mortification, and/or hurt feelings all in an amount according to
3 proof.

4 67. As a result of defendant Bridgers' statements, musicians and artists removed Plaintiff
5 from their projects and stripped Plaintiff of credits that he had obtained in producing their music,
6 including the following:

7 a. In or around January 2021, a musician advised Plaintiff that she could no
8 longer "put this song out. I'm so sorry you're going through all of the bullshit with Bridgers & your
9 ex. I wish none of this was happening to you, and I'm sorry that our good work can't come out right
10 now."

11 b. In or around May 2021, a musician advised Plaintiff that the statements posted
12 by Defendants "interrupted our work."

13 c. In or around July 2021, a music manager advised Plaintiff that Plaintiff's
14 credits were removed from materials because they were made "at a point when shit was sketchy."
15 Plaintiff is informed and believes that this was a direct reference to the defamatory posts made by
16 Defendants, including defendant Bridgers.

17 68. As a result of defendant Bridgers' conduct, Plaintiff suffered damages in an amount to
18 be proven at trial but no less than \$3,800,000.00.

19 69. Defendants acted with malice, fraud and oppression, and in reckless, willful and
20 conscious disregard for the rights of Plaintiff. Plaintiff is informed and believes that defendant
21 Bridgers intentionally used her high-profile public platform on Instagram to publish false and
22 defamatory statements regarding Plaintiff in order to destroy his reputation and further the personal
23 vendetta that was orchestrated by Bannon as a revenge plot following the end of a romantic
24 relationship. Plaintiff is thus entitled to recovery punitive damages from Defendants in an amount
25 according to proof.

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THIRD CAUSE OF ACTION

(False Light against All Defendants)

70. Plaintiff realleges and incorporates by reference Paragraphs 1 through 69, inclusive, as if the same were fully set herein.

71. Defendants violated Plaintiff's right to privacy by intentionally, willfully, and recklessly making statements to put Plaintiff in a highly offensive false light.

72. Defendants publicly disclosed material or information that showed Plaintiff in a false light. Plaintiff is informed and believes that in or around October 2020, defendant Bridgers willfully and maliciously published false, defamatory, and misleading statements about Plaintiff, including that she "witnessed and can personally verify much of the abuse (grooming, stealing, violence) perpetrated by Chris Nelson."

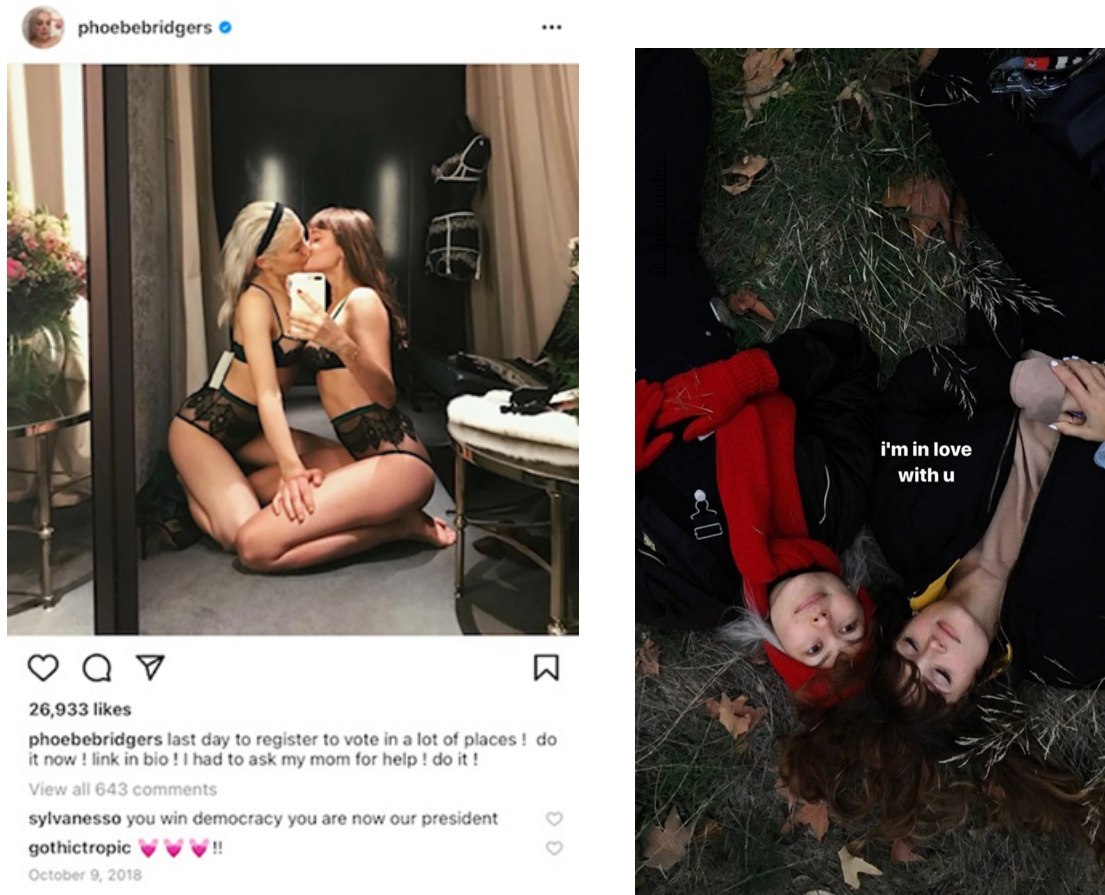
73. These statements were published and shared by defendant Bridgers on her public Instagram account, "@_fake_nudes," which she owned, operated, and/or controlled.

74. At the time defendant Bridgers published the false and defamatory statements, she had approximately 500,000 followers on her Instagram account.

75. Plaintiff is informed and believes that as part of a revenge vendetta against Plaintiff, defendant Bridgers also directed the public to Bannon's public Instagram account by publishing a post stating, "For anyone who knows [Plaintiff], is considering working with him, or wants to know more, there is an articulate and mind blowing account on @emilybannon's page as a highlight. TRIGGER WARNING for basically everything triggering." The posts on Bannon's Instagram account included false and defamatory statements that Plaintiff is a career criminal, murdered a man, commits racially-motivated hate crimes, abuses women, stole hundreds of thousands of dollars, trafficked in stolen or fake goods, committed cybercrimes, and defrauded numerous people. By tagging Bannon's Instagram, defendant Bridgers intended to notify, alert, or otherwise draw these individuals' attention to the false, defamatory, and misleading posts.

76. Plaintiff is informed and believes that defendant Bridgers intentionally, willfully, and maliciously placed Plaintiff in a false light at the request or encouragement of Bannon as part of a revenge plot to destroy Plaintiff's reputation and with the intent of further disseminating false and

defamatory information to Bridger's approximately 500,000 followers. Based upon information and belief, defendant Bridgers posted the defamatory publications due to her romantic relationship with Bannon:



77. The false light created by the statements made by defendants would be highly offensive to a reasonable person in Plaintiff's position.

78. Defendants knew the disclosure would create a false impression about Plaintiff or acted with reckless disregard for the truth. Defendants knew they had no factual basis to make the false statements and disclosures concerning Plaintiff but willfully chose to disregard the facts in order to intentionally destroy Plaintiff's reputation, character, and business. Defendant Bridgers admitted to Plaintiff after publishing the statements that she knew they were not based upon her experiences, knew they were false, and/or had serious doubts about the truth of the statements.

79. Plaintiff is informed and believes that defendant Bridgers willfully made false statements that Plaintiff committed abuse, including grooming, in order to intentionally attack

1 Plaintiff's existing and potential client base. Plaintiff seeks and strives to work with people of color,
2 women, and members of the LGBTQ community on music projects in order to provide equal
3 opportunities to all musicians regardless of race, ethnicity, gender, or sexual orientation. Defendants
4 falsely stated Plaintiff is an abuser and manipulator with specific intent to destroying Plaintiff's
5 business and reputation.

6 80. Defendants' intentional and reckless behavior was a substantial factor in causing
7 Plaintiff harm including: 1) harm to Plaintiff's property business, trade, profession and/or occupation;
8 2) expenses that Plaintiff incurred as a result of the statements; 3) harm to Plaintiff's reputation; and
9 4) shame, mortification, and/or hurt feelings all in an amount according to proof.

10 81. As a result of defendant Bridgers' conduct, Plaintiff suffered damages in an amount to
11 be proven at trial but no less than \$3,800,000.00

12 82. Defendants acted with malice, fraud and oppression, and in reckless, willful and
13 conscious disregard for the rights of Plaintiff. Plaintiff is thus entitled to recovery punitive damages
14 from Defendants in an amount according to proof.

15 **FOURTH CAUSE OF ACTION**

16 **(For Intentional Infliction of Emotional Distress against All Defendants)**

17 83. Plaintiff realleges and incorporates by reference Paragraphs 1 through 82, inclusive, as
18 if the same were fully set herein.

19 84. Defendant Bridgers intentionally and willfully published defamatory and misleading
20 statements on her public Instagram account for the purpose of destroying Plaintiff's reputation,
21 character, and profession.

22 85. The intentional and willful conduct of Defendants was outrageous.

23 86. Defendant Bridgers intended to cause Plaintiff emotional distress by willfully and
24 maliciously published false, defamatory, and misleading statements about Plaintiff, including that she
25 "witnessed and can personally verify much of the abuse (grooming, stealing, violence) perpetuated by
26 Chris Nelson."

27 87. These statements were published and shared by defendant Bridgers on her public
28 Instagram account, "@_fake_nudes," which she owned, operated, and/or controlled. At the time

1 defendant Bridgers published the false and defamatory statements, she had approximately 500,000
2 followers on her Instagram account.

3 88. Plaintiff is informed and believes that as part of a revenge vendetta against Plaintiff,
4 defendant Bridgers also directed the public to Bannon's public Instagram account by publishing a
5 post stating, "For anyone who knows [Plaintiff], is considering working with him, or wants to know
6 more, there is an articulate and mind blowing account on @emilybannon's page as a highlight.
7 TRIGGER WARNING for basically everything triggering." The posts on Bannon's Instagram
8 account included false and defamatory statements that Plaintiff is a career criminal, murdered a man,
9 commits racially-motivated hate crimes, abuses women, stole hundreds of thousands of dollars,
10 trafficked in stolen or fake goods, committed cybercrimes, and defrauded numerous people. By
11 tagging Bannon's Instagram, defendant Bridgers intended to notify, alert, or otherwise draw these
12 individuals' attention to the false, defamatory, and misleading posts and intentionally cause Plaintiff
13 emotional distress.

14 89. Defendants knew that Plaintiff intentionally seeks and strives to work with people of
15 color, women, and members of the LGBTQ community in order to provide equal opportunities to all
16 musicians regardless of race, ethnicity, gender, or sexual orientation. Defendant Bridgers nonetheless
17 falsely stated that Plaintiff committed abuse, grooming, violence, and theft with the specific intent of
18 causing Plaintiff severe emotional distress.

19 90. Defendant Bridgers' statement that she witnessed Plaintiff commit grooming is false
20 and defendant Bridgers knew it was false at the time she posted. Rather, defendant Bridgers had a
21 consensual sexual relationship with Plaintiff and Bannon that was entirely encouraged by both
22 defendant Bridgers and Bannon. For example, on Plaintiff's birthday in September 2019, defendant
23 Bridgers texted Plaintiff: "happy birthday idiot Let's have group sex." Defendant Bridgers also
24 texted Bannon around the same time stating: "Chris is such a catch." Defendant Bridgers also texted
25 Plaintiff and Bannon in approximately September 2019 stating, "'omfg Best fuckiversary EVER,"
26 which was in reference to the start of their consensual relationship.

27 91. Defendant Bridgers' statement that she witnessed Plaintiff commit theft is likewise
28 false and placed Plaintiff in false light. Defendant Bridgers experienced generosity from Plaintiff,

1 including the gift of a very rare guitar from Plaintiff and Plaintiff provided her drummer and guitarist
2 musical equipment, including guitars.

3 92. As a result of Defendants conduct, Plaintiff suffered severe emotional distress.
4 Defendants' conduct was a substantial factor in causing Plaintiff severe emotional distress. For
5 example, as a result of defendant Bridgers' statements, Plaintiff has received death threats that have
6 caused him emotional distress.

7 93. As a result of defendant Bridgers' conduct, Plaintiff suffered damages in an amount to
8 be proven at trial but no less than \$3,800,000.00.

9 94. Defendants willfully and intentionally made false, highly offensive, and defamatory
10 statements about Plaintiff with the intent of destroying Plaintiff's reputation, trustworthiness, and
11 business. Defendants intended to cause Plaintiff emotional distress. Defendant Bridgers intentionally
12 and maliciously posted the false statements and encouraged clients and potential clients of Plaintiff
13 not to work with him for the specific purpose of causing Plaintiff emotional harm and furthering the
14 revenge plot of Bannon. Defendants intended to cause emotional distress to Plaintiff so as to justify
15 an award of exemplary and punitive damages.

16 **FIFTH CAUSE OF ACTION**

17 **(For Injunctive Relief against All Defendants)**

18 95. Plaintiff realleges and incorporates by reference Paragraphs 1 through 94, inclusive, as
19 if the same were fully set herein.

20 96. As a direct and proximate cause of Defendants' ongoing wrongful acts, Plaintiff has
21 suffered and will continue to suffer substantial pecuniary losses and irreparable injury to his
22 reputation and business, economic relations.

23 97. Plaintiff has no adequate remedy at law to compensate him for the continuing injuries
24 and harm inflicted by Defendants. Plaintiff is entitled to temporary, preliminary, and permanent
25 injunctive relief.

26 **PRAYER FOR DAMAGES**

27 98. For general damages in excess of the minimum jurisdiction of this Court according to
28 proof.

1 99. For special damages in excess of the minimum jurisdiction of this Court according to
2 proof.

3 100. For injunctive relief prohibiting Defendants from continuing to defame Plaintiff as
4 complained herein and requiring Defendants to remove each and every defamatory publication by
5 them about Plaintiff from Instagram and from anywhere else that they appear on the internet or print.

6 101. For punitive damages against Defendants.

7 102. For costs of suit incurred herein.

8 103. For such other and further relief as the Court may deem proper.


9 **DEMAND FOR JURY TRIAL**

10 Plaintiff hereby demands a jury trial in this matter.

11
12 Dated: September 27, 2021

CLARK HILL LLP

13
14 By: _____


Bradford C. Hughes
Tiffany B. Hunter

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16 Attorneys for Plaintiff CHRIS NELSON
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VERIFICATION

I, Chris Nelson, am the plaintiff in the above-entitled matter. I have read the foregoing Complaint and the know the contents thereof. The same is true of my own knowledge, except as to those matters, which are therein stated on information and belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 27th day of September 2021, in Los Angeles, California.


Chris Nelson