

Christina Taft  
Plaintiff in Propria Persona  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION**

**CHRISTINA TAFT,**

Plaintiff,

vs.

**PAUL BARRESI, ADAM R  
WALDMAN,  
and DOES 1-10, inclusive,**

Defendants.

Case No.: 5:24-cv-01930-TJH-DTB

**SECOND AMENDED COMPLAINT  
AND DEMAND FOR JURY TRIAL**

- 1) Violation of the Tom Bane Civil Rights Act (Cal. Civ. Code § 52.1)
- 2) Invasion of Privacy (Intrusion into Private Affairs and Conversations)
- 3) California Penal Code §§ 632, 637.2 (Unauthorized Recording and Disclosure)
- 4) Violation of Cal. Civ. Code § 3344 (Unauthorized Use of Voice, Name and Likeness)
- 5) Civil Harassment (Cal. Code of Civ. Proc. § 527.6)
- 6) Stalking (Cal. Civ. Code § 1708.7)
- 7) Civil Conspiracy
- 8) Negligence
- 9) Intentional Infliction of Emotional Distress
- 10) Negligent Infliction of Emotional Distress
- 11) Violation of the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §§ 1961–1962

**DEMAND FOR JURY TRIAL**

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2 1. Plaintiff Christina Taft, an individual, respectfully files this Second  
3 Amended Complaint (“SAC”) in this Court, seeking redress for a series of  
4 egregious violations perpetrated by Defendants Paul Barresi, Adam Waldman, and  
5 Does 1-10, who obstructed Plaintiff’s rights of association, public safety reporting,  
6 free speech, witnesses, and interests. Defendants forced Plaintiff, witnesses, assault  
7 victims, and Plaintiff’s family into recanting statements and forced audio  
8 statements. Defendants also falsified documents. Defendants repeatedly threatened  
9 violence for its own interstate commercial advantages. Defendants have  
10 outrageously taken away Plaintiff’s and others’ autonomy, independence and  
11 wellbeing.  
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14 2. As a result, Plaintiff has incurred significant financial losses and has  
15 suffered emotionally. Plaintiff was also forced to withdraw from public safety-  
16 related contracts that required clear operations and engagement in California, as  
17 well as in areas near witnesses and victims whom Defendants sought to control and  
18 silence. For the past five years, Plaintiff has been involved in start-ups focused on  
19 promoting safety and supporting individuals through the Arts. This growing  
20 influence and work interfered with Defendants' ongoing efforts to undermine and  
21 suppress such initiatives.  
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1           3. Plaintiff discovered that Barresi—through psychological coercion,  
2 manipulation of witnesses and victims, and efforts to suppress autonomy and  
3 freedom—has continued engaging in illicit activities. Barresi, a self-proclaimed  
4 "Hollywood fixer," has obsessively targeted and defamed individuals he perceives  
5 as obstacles, demonstrating a pattern of disturbing and harmful conduct.  
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8           4. Plaintiff seeks damages arising from Defendants' conduct, which  
9 constitutes multiple violations under both California and federal law. These  
10 include: (1) violation of the Tom Bane Civil Rights Act, California Civil Code §  
11 52.1; (2) invasion of privacy involving private affairs and conversations, in  
12 violation of Article I, Section 1 of the California Constitution and as set forth in  
13 CACI Nos. 1800; (3) unauthorized recording and disclosure in violation of  
14 California Penal Code §§ 632 and 637.2; (4) unauthorized use of Plaintiff's voice,  
15 name, and likeness in violation of California Civil Code § 3344; (5) civil  
16 harassment under California Code of Civil Procedure § 527.6; (6) stalking in  
17 violation of California Civil Code § 1708.7; (7) civil conspiracy; (8) negligence;  
18 (9) intentional infliction of emotional distress; (10) negligent infliction of  
19 emotional distress; and (11) violations of the federal Civil RICO Act, including  
20 racketeering activity, pursuant to 18 U.S.C. §§ 1961 and 1962.  
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## I. JURISDICTION AND VENUE

5. Plaintiff Taft is a citizen of the State of Hawaii. Upon information and belief, Defendant Waldman is a resident of Palm Beach, Florida. Upon information and belief, Defendant Barresi is a citizen of San Bernardino, California.

6. Therefore, there is complete diversity of citizenship between the parties. Moreover, Plaintiff asserts federal claims arising from Defendants' interstate communications in furtherance of their fraudulent schemes, thereby invoking federal question jurisdiction under 28 U.S. Code § 1331.

7. The amount in controversy exceeds \$75,000, exclusive of interest and costs.

8. This Court may exercise personal and subject matter jurisdiction under 28 U.S. Code § 1331 and 28 U.S. Code § 1332.

9. Venue is proper under 28 U.S. Code § 1391 as a substantial part of the events giving rise to the claim occurred within this district.

## II. THE PARTIES

10. Plaintiff Taft is a humanitarian, philanthropist, and entrepreneur. She is the founder and CEO of Rescue Social Inc. and Worldie Ltd, a public safety investor. She is a coordinator of SaveMeNow, former board member of Aedan - now TurnKeyCapital, and process server. After losing her mother, Victoria Taft in

1 2018, Taft devoted her businesses and professional projects to solving, mitigating,  
2 and improving public safety and to motivate business partners to improve systems  
3 of rescue. Plaintiff dedicated herself to improving responses, community aid,  
4 public affairs, and positive resources in the Arts, with her mother's family having  
5 four generations in the film business since the 1950s Golden Hollywood.  
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8 11. Upon information and belief, Defendant Barresi is an individual citizen  
9 of San Bernardino, California.  
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11 12. Upon information and belief, Defendant Waldman is an individual  
12 citizen of Palm Beach, Florida.  
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### 14 **III. FACTUAL BACKGROUND**

15 13. Barresi has a long history of targeting vulnerable individuals connected  
16 to the Arts, including witnesses involved in both civil and criminal cases. Over  
17 several decades, he has engaged in coercive and unlawful conduct, including  
18 collaboration with disgraced private investigator Anthony Pellicano to carry out  
19 racketeering, extortion, and witness tampering. Barresi has admitted to recording  
20 Plaintiffs and the families of assault victims without consent, and in some  
21 instances, falsifying audio recordings to pressure them into dropping their claims.  
22 He has exploited these actions for personal gain, including through the commercial  
23 release of his 2024 book, *Johnny Depp's Accidental Fixer*. Official findings by the  
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1 Attorney General and Department of Consumer Affairs confirm that Barresi  
2 committed fraud, made false statements, and manufactured evidence, including  
3 filing false reports against victims.  
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5 14. Barresi's coercive tactics include threatening victims and their associates  
6 with consequences if they refuse to comply with his demands, and engaging in  
7 repeated, harassing contact with their networks to intimidate and isolate them.  
8 Waldman enabled, benefited, yet allegedly felt threatened from Barresi's conduct,  
9 rewarding him and using his freelancing as Waldman acquiesced in his strategy,  
10 with unconsented recordings of phone calls and media. Waldman personally  
11 ignored pleas from witnesses, victims, and Plaintiff to stop Barresi's intimidation  
12 campaign. Plaintiff, following in the footsteps of her mother Victoria Taft and her  
13 mother's colleague Lori Mattix, sought to assist figures in the Arts, including  
14 Amber Heard and attorney Roberta Kaplan, and was targeted as a result. The  
15 Plaintiff was highly influenced by Rose McGowan asking her for help in the same  
16 year after retaliation involving monitoring and break-ins occurred to McGowan.  
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22 15. A jury in *Depp v. Heard*, No. CL-2019-2911, found that Waldman acted  
23 as Johnny Depp's agent and previously Judge Bruce White on October 23, 2020  
24 revoked his *pro hac vice* status after giving the press confidential information. In  
25 connection with that and related matters, Defendants allegedly participated in  
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1 coordinated efforts to influence witnesses, including by promoting or covering up  
2 what has been characterized as a hoax involving witnesses perceived as favorable  
3 to Amber Heard. Defendants issued threats of violence and engaged in tactics  
4 intended to control and intimidate individuals they viewed as aligned with Heard,  
5 as well as those seen as sympathetic to Depp. These included harassment, threats  
6 of physical harm and death, and efforts to isolate and falsely imprison individuals  
7 to instill fear and maintain control. Defendant Barresi in particular monitored and  
8 targeted Plaintiff and those in communication with her, issuing both credible and  
9 false threats that resulted in substantial emotional distress. Defendants also incited  
10 conflict among victims, witnesses, and other parties to sow confusion, discredit  
11 opponents, and further their own agenda. These actions caused direct harm to  
12 Plaintiff and support her claims of harassment, invasion of privacy, civil  
13 conspiracy, and intentional infliction of emotional distress.

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19 16. Plaintiff was deprived of the ability to live freely or pursue a career in  
20 the Arts due to Defendants' repeated unconsented use, manipulation and multiple  
21 unauthorized disclosures of her private phone call with assault and retaliation  
22 victim Angela Meador. This recording, made without consent, became a tool in  
23 Defendants' ongoing campaign of coercion and psychological distress against  
24 Plaintiff. Plaintiff regarded Meador as a friend and sought to protect her from  
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1 being drawn into further harm, including threats to her music career. In addition,  
2 Barresi exploited Plaintiff's family—including her mother Victoria Taft, father,  
3 and siblings—as instruments of intimidation and control. These efforts extended to  
4 Plaintiff's friends, associates, and potential collaborators, and involved threats of  
5 violence, blackmail, and abuse. As a result, Plaintiff's financial stability and  
6 professional trajectory were severely damaged. Her once-promising career stalled,  
7 forcing her to relocate for safety and leaving her vulnerable to continued  
8 exploitation.

12 17. After Plaintiff, along with her friends, family, associates, and several  
13 witnesses and victims, began suffering harm as a result of Defendants' actions,  
14 Barresi publicly released a recorded phone call with Waldman. In December 2022,  
15 Waldman further rewarded Barresi by facilitating a call between Barresi and  
16 Johnny Depp, which Barresi later publicized, claiming he had spoken with and  
17 advised Mr. Depp directly. At that time, Plaintiff had briefly returned to Los  
18 Angeles but was forced to leave after just five hours due to escalating fear and  
19 distress. While visiting Hawaii, Plaintiff became increasingly alarmed upon  
20 learning that Defendants were continuing to endorse and elevate Barresi despite the  
21 ongoing harm. As a result, Plaintiff relocated permanently from California to  
22 Hawaii, and after 2023, to France.



1 18. Plaintiff was overwhelmed by a pattern of escalating threats,  
2 unauthorized recordings, and the involvement of her vulnerable friends and family,  
3 compounded by the unresolved disappearance of Anthony Fox. These  
4 circumstances left Plaintiff in a constant state of distress. Despite her repeated  
5 efforts to seek legal support and plead for intervention, she encountered mounting  
6 legal expenses and no protective orders or meaningful assistance. Plaintiff  
7 specifically raised concerns about the unauthorized use of her initial phone call  
8 with Angela Meador by Defendant Barresi, and the coercive tactics he employed.  
9 Barresi used this unconsented recording as leverage to manipulate Plaintiff,  
10 exploiting her desire to protect Meador from harm and attempting to force  
11 statements from both individuals under threat and emotional pressure.  
12 Approximately during this same time span, a tribute article with original interviews  
13 on Plaintiff's mother Victoria Taft in the Associated Press was removed.  
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15 19. Between March and April 2019, shortly after losing her mother, Plaintiff  
16 was contacted by a source identifying as "Jane Doe," who was connected to a  
17 former staff member of Johnny Depp. Doe made alarming claims about threats to  
18 witnesses, the disappearance of Viper Room co-owner Anthony Fox, and  
19 confirmed abuse against Amber Heard. The exchange included disturbing  
20 suggestions that "Hollywood has its own laws" and threats implying Plaintiff's  
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1 mother had known to remain silent. Plaintiff later referenced this interaction in a  
2 public presentation as an example of the need for improved responses to  
3 traumatized witnesses for safety and rescue by certified responders.  
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5 20. In 2020, the U.K. High Court found Johnny Depp had assaulted and  
6 credibly threatened to kill Amber Heard in *Depp v. News Group Newspapers*,  
7 issuing a 131-page judgment. Plaintiff, Taft, hoped Heard could return to her  
8 humanitarian work and sought to support that effort. That summer, Angela Meador  
9 hoped Depp could return to work and shared a song against abuse that “*men and*  
10 *women are equal.*” In July 2020, Taft connected screenwriter and Heard supporter  
11 Nitish Kannan with reporter Krystina Meens of Optomen. Around the same time,  
12 she began collaborating with SaveMeNow, a public safety initiative led by former  
13 firefighter Niko Sanchez, and later wrote an article promoting that partnership  
14 through Kannan’s platform, *True Hollywood Talk*. Kannan also included positive  
15 quotes from Heard in his 2021 book, *How to Manifest Anything*.  
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21 21. By late 2020, several individuals connected to Taft—including Angela  
22 Meador, Ian Herndon, Molly Beaton, Mario Nitrini, and Richard Albertini—were  
23 actively seeking support networks in the Arts and discussing issues of abuse.  
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25 Barresi reportedly interfered in these efforts by provoking disputes and  
26 monopolizing resources. In November 2020, Richard Albertini left a voicemail for  
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1 Nitrini alleging that Meador had been brutally raped by actor Marton Csokas, and  
2 that materials from the assault were retained for retaliation. The message became a  
3 key early account of Meador's victimization, though Albertini later turned  
4 threatening toward her, allegedly due to influence from Barresi. Taft consistently  
5 opposed retaliation against any victim or witness.  
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8 22. Following the judgment against Depp in November 2020, Taft observed  
9 a wave of coordinated threats—repeated over 100,000 times—targeting Heard  
10 under an *Access Hollywood* interview titled “Adapt and Survive.” Concerned by  
11 the volume and consistency of the harassment, Taft began investigating. Between  
12 February and April 2021, she consulted Michael Mazza, a PhD candidate at the  
13 University of Pisa, who identified possible network links involving a film  
14 production company and a sports team. Taft forwarded this information to Amber  
15 Heard's legal counsel, Roberta Kaplan, and journalist Ronan Farrow's outlet, Glass  
16 Canon Inc. After receiving no meaningful response, she continued her  
17 investigation with the help of Egyptian analysts.  
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22 23. On September 14, 2021, Molly Beaton filed her first report with the  
23 Maitland Police Department in Florida (Case No. 48-2021-NM-002537), alleging  
24 that Barresi was targeting sex crime survivors, including Angela Meador. A  
25 follow-up report filed the same day reiterated ongoing threats to Angela's life and  
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1 included photographs depicting types of physical injuries allegedly inflicted by  
2 Marton Csokas. Beaton also reported threats from Richard Albertini. Around the  
3 same time, Angela texted Beaton that police had issued warnings but Albertini  
4 continued to endanger her; she inquired whether the FBI had been contacted.  
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7 24. Beginning in February 2022, Plaintiff Taft began publishing research  
8 from her investigative team, which attracted interest from prospective clients in the  
9 visual and performing arts. With the support of interns from a university  
10 partnership in the Upper Midwest, her team advanced analysis for those clients and  
11 their cases.  
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14 25. Defendant Barresi has deliberately caused harm to Plaintiff, her loved  
15 ones, friends, associates, and key witnesses through schemes targeting individuals  
16 on all sides of public controversies. Plaintiff seeks immediate injunctive relief to  
17 end this pattern of abuse. Additionally, Defendant Barresi perceived and  
18 manufactured against Plaintiff and her associates, friends, and family, taking away  
19 autonomy, as perceived “Johnny witnesses” and “Amber witnesses,” preventing  
20 release or living freely through collections by Barresi of materials and  
21 unauthorized disclosures, especially with unconsented recordings of telephone  
22 calls, and continued psychological distress with repeatedly directed consequences.  
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1 26. Plaintiff, to this day, has a fear for the lives of those she cares about and  
2 she feels threatened, who have been lost in Defendants' agendas.  
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4 27. Between May and September 2022, Plaintiff Taft engaged with  
5 witnesses and victims who had been caught in Defendants' manipulative tactics.  
6 She attempted to correct falsified interviews and resist coercive actions by Barresi,  
7 which placed her at personal risk. During this period, Plaintiff uncovered further  
8 evidence that Barresi interfered with witnesses connected to the Viper Room and  
9 Johnny Depp. Defendant Barresi publicly implied his involvement in a death and  
10 disseminated threatening messages, including directing Mario Nitrini to publish  
11 content about non-testifying witnesses. Barresi's actions included targeting  
12 individuals such as Joshua Cruz and Ivan Klousia, leveraging misleading  
13 information for media gain. Documents showed that Barresi was paid for this  
14 material and had falsely presented witness narratives, including those concerning  
15 actor Marton Csokas and other abuse claims. Plaintiff also witnessed  
16 communications suggesting Waldman accepted Barresi's efforts.  
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22 28. During the same time, Plaintiff received corroborating messages and  
23 files from Nitrini that included Barresi's communications with Waldman, harmful  
24 media drafts written by Barresi and marketing contacts (American Media Inc,  
25 RadarOnline, New York Daily News, Daily Mail, New York Post) and audio  
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1 recordings involving multiple witnesses. Taft also learned from Richard  
2 Albertini—former Viper Room employee and Depp associate—that Barresi had  
3 threatened him and claimed he wanted Albertini to believe he was capable of  
4 murder. Albertini expressed a desire to testify about abuse he witnessed, including  
5 an incident involving a cigarette burn allegedly inflicted by Depp, but stated he  
6 was blackmailed. As these events escalated, Barresi began targeting Plaintiff's  
7 professional contacts. He intimidated Plaintiff's friend and former colleague Daniel  
8 Brummitt, misrepresenting himself and leaving threatening voicemails referencing  
9 Brummitt's personal life and home address. These tactics damaged Taft's personal  
10 relationships and reinforced the ongoing threat to her safety.

15 29. In June 2022, amid escalating threats and intimidation, Plaintiff sought  
16 legal oversight for an investigation into witness harm. She reached out to attorney  
17 Antonio Sarabia II and consulted with expert Neal Rauhauser, who suggested the  
18 findings could support an amicus brief. Concerned about due process, Plaintiff  
19 began financing an amicus effort through attorney Thomas Urban of Fletcher,  
20 Heald & Hildreth, PLC in Washington, D.C. Around the same time, Mario Nitrini  
21 informed Plaintiff that he had provided information to Gregg "Rocky" Brooks—  
22 who had sued Johnny Depp for assault on the set of *City of Lies*—about Barresi's  
23 connection to Waldman and their efforts to interfere with Brooks' case. Nitrini  
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1 forwarded documentation and noted that Amber Heard had initially been listed as a  
2 witness. In follow-up messages, Nitrini reported that Barresi was “freaking out”  
3 about the discoveries and expressed willingness to file a criminal complaint if  
4 Barresi retaliated against him or his family.  
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7 30. Fearing further retaliation, Plaintiff enlisted retired LAPD-licensed  
8 private investigator Mike McCormick on June 16, 2022, to assist in reporting to the  
9 Bureau of Security and Investigative Services and the FBI. McCormick primarily  
10 documented interactions with Albertini and supported witness protection efforts.  
11 That same month, Plaintiff discovered a 2019 audio recording in which Waldman  
12 acknowledged knowing about Barresi’s unconsented recordings and coercive  
13 tactics, yet showed little concern. Waldman admitted that Barresi had a reputation  
14 as a “celebrity stalker,” threatens, and associated with convicted investigator  
15 Pellicano, but nonetheless used his freelancing to advance Depp’s interests. Press  
16 releases were proposed. The recording revealed that Waldman prioritized  
17 “Johnny’s interest” over the safety of witnesses, minimizing Albertini’s role as “just  
18 a piece of the evidence.” These admissions, combined with Waldman’s tolerance of  
19 Barresi’s illegal monitoring and intimidation, raise serious concerns of aiding and  
20 abetting under California Penal Code § 633.5, particularly in light of blackmailing  
21 witnesses that have since been reported to authorities.  
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1           31. On June 20, 2022, Plaintiff Taft and Richard Albertini were informed  
2 that the recording of the phone call by Albertini and use of its contents was  
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4 unconsented to by Adam Waldman via attorney Stephen Braga, who alleged  
5 Waldman was in California at the time. Although Plaintiff believed her later  
6 recordings were lawful, the allegation intensified her fears—particularly  
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8 concerning the call she later had with victim Angela Meador. Days later, Plaintiff  
9 uncovered an email from Barresi dated July 28, 2019, titled “COOPERATING  
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11 WITNESS,” which included falsified statements attributed to Albertini. In  
12 corrected interviews, Albertini confirmed violent incidents engaged in the Viper  
13 Room—ranging from assaults to financial misconduct—corroborating other  
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15 witness accounts. He specifically described Depp extinguishing a cigarette on a  
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17 model’s head and confirmed testimony consistent with Ellen Barkin’s prior  
18 statements about Depp’s aggression. Albertini also recounted underage actors  
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20 frequenting the club, illegal gambling, and shadow entities like Chud King Inc.  
21 allegedly used to launder funds and historically overpaid Viper Room staff. These  
22 accounts aligned with sworn documents from *Anthony Fox v. Safe In Heaven Dead*  
23 *Productions*, revealing suspected forged licensing agreements and covert payments  
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25 by affiliated shell companies.  
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1           32. In July 2022, Claudia Jamisen, a former Viper Room host, shared further  
2 corroborating details with Plaintiff. She described being protected by Albertini  
3 during her time at the club, expressed friendships she enjoyed there, and Depp  
4 being shy or considerate with her. While she did not personally witness the assault  
5 incidents, she recounted Albertini's claims, including one of Depp extinguishing a  
6 cigarette on a woman's forehead. Jamison also described the Viper Room's secret  
7 "mirrored wall" room used for illicit activities and named several celebrity patrons.  
8 She and Plaintiff expressed concern for Albertini's safety after he came forward  
9 with these allegations. Jamison provided additional witness names and has  
10 maintained a friendship with Plaintiff since that conversation. These events further  
11 reflect the coordinated efforts by Defendants to suppress evidence, obscure  
12 discovery of witnesses to interview, and interfere with potential testimony.  
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18           33. On July 28, 2022, Plaintiff interviewed Richard Albertini, who recounted  
19 witnessing an incident at the Viper Room where Johnny Depp allegedly became  
20 enraged upon seeing Kate Moss dance with model Stacy Lee Lopez. According to  
21 Albertini, Depp pushed Moss, grabbed Lopez by the hair, and extinguished a  
22 cigarette on her head. Paul Schindler intervened, leading to Depp threatening to  
23 kill him. Albertini detailed other violent behavior by Depp, including aggression  
24 toward assistant Bruce Corkum and instigating fights with patrons. He also  
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1 described Schindler as violent and possibly involved in the disappearance of co-  
2 owner Anthony Fox, boasting about it to others. Albertini accused Barresi of  
3 twisting his statements and intimidating witnesses. During this period, Barresi  
4 publicly disparaged Albertini and, as Albertini grew more confident following  
5 corrected interviews with Taft, he filed a renewed police report in July 2022,  
6 alleging death threats and ongoing harassment tied to his intent to testify for  
7 Amber Heard. The report involved the FBI, with Special Agent Metcalf joining the  
8 case alongside the Lancaster County Sheriff's Office.  
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12 34. During this same time, Taft maintained communication with Angela  
13 Meador, who described a harrowing account of being kidnapped and assaulted by  
14 actor Marton Csokas in New Orleans. Meador claimed she was drugged, physically  
15 abused, held captive for three days, stripped, and filmed against her will. She also  
16 alleged that an armed associate of Csokas threatened her and that multiple other  
17 women had experienced similar abuse. Taft provided emotional support to Meador  
18 while navigating increasing witness intimidation. Meanwhile, Barresi attempted to  
19 suppress ongoing investigations, contacting Taft's private investigator Mike  
20 McCormick and asserting control over communications related to Meador's claims.  
21 He admitted paying individuals like Mario Nitrini and others to influence  
22 narratives. Separately, former Viper Room employee Olivia Barash faced  
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1 obstruction from Barresi while developing a documentary. Plaintiff encouraged her  
2 to continue the project despite Barresi's interference. These incidents illustrate  
3 Defendants' pattern of coercion, obstruction, and retaliatory behavior aimed at  
4 silencing witnesses and those attempting to expose abuse.  
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7 35. On July 28, 2022, Plaintiff spoke with Meador, who described in detail  
8 the trauma she endured from being kidnapped and assaulted by actor Csokas,  
9 followed by two years of harassment and retaliation from individuals acting on his  
10 behalf. Meador expressed repeated concerns about privacy and safety, asking that  
11 her story not be publicized. She recounted how the intimidation began before she  
12 had even left the hospital and described daily harassment during the first year and a  
13 half. Meador also referenced Barresi, stating he was involved in "a lot of stuff"  
14 connected to her harassment. When she learned the conversation with Taft was  
15 being recorded, Meador became distressed, emphasizing that she did not want it  
16 shared publicly. Taft reassured her that the recording would only be used for legal  
17 purposes and offered to send her a copy, which she sent to Meador on email and  
18 text after their call. Throughout, Taft responded empathetically and validated  
19 Meador's experience, showing concern for her safety and emotional well-being.  
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25 36. That same day, Taft received over 30 emails sent by Barresi to her  
26 investigator, retired LAPD officer Mike McCormick. The emails revealed Barresi's  
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1 obsessive and erratic behavior, with repeated references to tracking, influencing,  
2 and publishing information about targeted individuals, including Meador and  
3 Albertini. Barresi's messages included contradictions—claiming he wasn't  
4 coercing anyone while directing Nitrini on what to post or write. He also made  
5 disturbing comments, such as, "The more you prolong a crisis, the bigger the  
6 payday is how it works," suggesting he profited from prolonging harm and chaos.  
7 These emails exposed a broader pattern of manipulation, witness intimidation, and  
8 exploitation for personal and commercial gain, confirming that Barresi actively  
9 coordinated harmful narratives targeting victims and witnesses involved in  
10 sensitive legal matters.

15 37. On October 9, 2022, Barresi publicly disseminated a manipulated an  
16 unconsented recording of a private phone call between Plaintiff and Meador,  
17 falsely suggesting conspiracy and causing serious emotional harm. This marked a  
18 clear escalation in Barresi's pattern of exploitation, placing Plaintiff and Meador in  
19 further danger and isolating them through psychological coercion.

22 38. In texts to Taft, Meador asks if she should, "beg Barresi to stop" and she  
23 was "begging this group to make it stop" that she cannot "live freely" and that  
24 "Marton Csokas will kill me himself!" Plaintiff is psychologically and highly  
25 emotionally damaged from Defendants' unauthorized disclosures of her  
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1 unconsented recording of her phone call with Angela Meador, who was a friend  
2 nearly daily with her for months, sharing confidential experiences and  
3 communications, being exploited and abused by Barresi.

5 39. Beginning in October 2022, Barresi unlawfully obtained and distributed  
6 an unconsented recording of a private telephone conversation between Plaintiff  
7 Taft and assault victim Angela Meador without their consent. Rather than  
8 obtaining permission to use the call, Defendant edited and disseminated it  
9 repeatedly through YouTube and press outlets, including later promoting it  
10 alongside his self-published book, *Johnny Depp's Accidental Fixer*. This  
11 unauthorized use became a cornerstone of Defendant's ongoing campaign of  
12 coercion, intimidation, and character assassination—specifically targeting Plaintiff  
13 and Meador, both of whom are professionals in public safety and the arts. Despite  
14 clear notice that Meador was in fear and had not authorized release, Barresi  
15 disseminated the recording to publicists, thereby exposing both women to further  
16 retaliation and public exploitation.

22 40. Around the same period, Plaintiff was subjected to an extortion attempt by  
23 Richard Albertini, who demanded \$25,000 in cash under threat, in what appeared  
24 to be a coordinated effort with Barresi's false narrative that Plaintiff possessed  
25 significant wealth. Both Defendant Barresi and Albertini repeated these claims  
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1 while enhancing Plaintiff's vulnerability. Defendant Barresi continued his  
2 aggression against Plaintiff, knowing it was causing financial damages and needs  
3 for personnel to correct his actions, only for him to re-ignite the harm in his  
4 obsession of her.  
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7 41. These acts, alongside ongoing threats and coercion, led Plaintiff to file a  
8 formal complaint with the California Department of Consumer Affairs on October  
9 10, 2022, citing severe violations of witness privacy, retaliation, audio recordings,  
10 and obstruction of justice. A list of witnesses was provided in the report.  
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12 42. In October and November 2022, Defendant Barresi escalated a pattern of  
13 coercion and psychological harassment against Taft. He continued to publicly and  
14 with third parties disseminate an unauthorized audio recording between Plaintiff  
15 and assault victim Angela Meador, despite clear communications that Meador had  
16 not consented and was in fear for her safety. Barresi also sent Plaintiff dozens of  
17 emails and texts containing threats, false mafia connections, and manipulated  
18 materials—including her deceased mother's coroner report—to instill fear and  
19 compel silence.  
20  
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22  
23 43. From October to November 2022, Defendant Barresi took several  
24 actions to reinforce his authority and enforce isolation between Plaintiff with  
25 women who would otherwise provide support and care to each other, especially for  
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1 their careers, communications, social wellbeing, positive publicity, charity, and  
2 freedom of association. Plaintiff was damaged by Defendant Barresi regarding  
3 both Heard, who she sponsored, and her friend Angela Meador. On October 4,  
4 2022 Angela Gayle's Official Music Site was well and active, which Meador and  
5 Plaintiff had communicated through. Defendant enforced in his actions and  
6 exploitation of their unconsented recording that Angela Meador was a "vulnerable  
7 woman" forced to have wrongful consequences as he directed Heard to have for  
8 associations with Plaintiff, based on Taft trying to show her support and for her to  
9 live freely, affecting her music career. Defendant Barresi threatened retaliation  
10 through personnel he directed to retaliate to enforce their social isolation.  
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15 44. On October 9, 2022, Barresi began wrongful uses, disseminations, and  
16 unauthorized disclosures of the unconsented audio recording of Taft and Meador.  
17 This exploitation continued repeatedly, with documented incidents on October 10,  
18 14, 15, 22, December 16, 28, 31, 2022, and October 27, 28, 2023, December 31,  
19 2023, January 2024, December 31, 2024, and in emails in November 2022 and  
20 August 2024, showing a persistent pattern of using this recording as leverage  
21 against both women. On October 9th, Defendant Barresi explicitly published a  
22 forged "exhibit A" of Plaintiff and Meador's unconsented recording and private  
23 conversation that summarized what he sent to Publicists. Spreading the  
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1 unconsented recording of Taft and Meador to publicists was emotionally damaging  
2 to cause panic and divergence. In one particularly disturbing incident, Defendant  
3 Barresi uses Angela Meador and Christina Taft's 'secret' phone recording and calls  
4 Marton Csokas an 'Equalizer star.' Defendant enforced their phone call to be about  
5 filing a police report against him, and diverted it from Csokas.  
6  
7

8 45. On October 13, 2022 and to October 19, 2022, and to April 2025,  
9 Defendant Barresi exerted coercive authority over both Plaintiff and Meador in  
10 response to their communications. He did so by leveraging a stylized “artistic”  
11 letter, to influence law enforcement about statements, that portrayed various forms  
12 of retaliation Meador allegedly faced for speaking out about her assault by Marton  
13 Csokas. The content of the letter was highly alarming and appeared to intimidate  
14 Meador by depicting scenarios involving threats, surveillance, and coercion.  
15 Specifically, it referenced Csokas being aware of allegations of wrongful “false  
16 imprisonment and sexual torture and assault,” and included veiled threats  
17 discouraging Meador from pursuing reporting her assault, or any public or legal  
18 action. The letter also mentioned the existence of videotaped material that could be  
19 used against her, as well as threats of physical consequences should Csokas’s name  
20 be made public—such as traveling to Florida to confront Meador and interfere with  
21 law enforcement to wrongfully cause her harm.  
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1           46 . To Plaintiff, the summarized letter was a disturbing depiction of what  
2 Meador had actually experienced, though it was never formally introduced in any  
3 legal proceeding. Nevertheless, Defendant Barresi appeared to weaponize this  
4 document as a means of intimidation—using it to suppress Plaintiff’s  
5 communications with Meador and to reinforce a climate of fear. His actions served  
6 to isolate Meador, dissuade her from seeking justice, and intimidate those  
7 attempting to support her. Meador showed genuine belief of this retaliation to  
8 Plaintiff on October 19, 2022, after being contacted on behalf of Defendant  
9 Barresi.  
10

11           47. On October 18, 2022, messages between Taft and Meador before a  
12 restraining order hearing against Defendant Barresi showed Taft advising Meador  
13 to maintain her claims about experiencing threats and violence while being  
14 cautious about identification of the perpetrator, advising "make sure it's clear there  
15 were threats and intimidation to you, but the person was not identifiable," with  
16 more clarity to Meador, “just to protect yourself don’t recant any of the threats or  
17 violence you experience, but just the identity” or to re-direct the identity for her  
18 safety. Plaintiff wanted no pressure to Meador, to sleep well and have friends to  
19 help her, to not be burdened with the restraining order hearing, and knew that  
20 Barresi wasn’t the one who threatened her with a gun years before. Plaintiff didn’t  
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1 want pressure and feared that Defendant Barresi could force Meador to recant her  
2 statements about threats or violence by Marton Csokas with retaliation.  
3

4 48. On October 19, 2022, Meador expressed genuine fear of retaliation to  
5 Plaintiff after being contacted on Barresi's behalf. This fear was not unfounded.  
6 Defendant Barresi has, on multiple occasions, made explicit references to violence  
7 and claims about having access to armed guards and private security tied to high-  
8 profile clients. These repeated threats created a constant state of hypervigilance for  
9 Plaintiff and Meador. With Meador, he manipulated the retaliation (as documented  
10 in the unconsented recording Defendant Barresi obtained) after her assault,  
11 exploiting her vulnerability. Starting in October 2022, Defendant Barresi exploited  
12 vulnerabilities of Meador from Plaintiff's unconsented recording of her phone call  
13 with her and the letter artifact he obtained that determined she was conditioned to  
14 listen to the authority of lawyers that were on Csokas's behalf, with further private  
15 enforcement through repeated communications (text messages, phone calls, emails,  
16 and in-person confrontation) requiring her to believe this authority and to influence  
17 law enforcement. Through this, he'd coerce Plaintiff from their communications  
18 and caring about her wellbeing. Defendant exploited her with her law school  
19 background, who dreamed of being a judge, making her susceptible to lawyers  
20 contacting her, which he began as early as after the October 19, 2022 hearing.  
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1 Defendant continued to contact her. Defendant Barresi misrepresented that he had  
2 the authority of a lawyer to Meador as Plaintiff saw from their text messages.  
3

4 49. In October, October 22 and October 23, 2022, immediately after another  
5 incident of Defendant Barresi exploiting Meador and Taft's unconsented recording  
6 of their phone call, Plaintiff saw that Defendant Barresi manipulated Rebecca  
7 Berry, a beginner journalist, and obtained Plaintiff and Meador's unconsented  
8 recording of their phone call, as well as other unconsented phone recordings, and  
9 that Defendant Barresi was informed that it was against consent and Meador feared  
10 its use. Defendant Barresi sent the unconsented recording of Plaintiff and Meador  
11 to Matthew Lewis (ThatUmbrellaGuy) who publicized it on his for-profit channel.  
12 Berry explicitly informed Barresi that "Angela is in genuine fear and I'm sure  
13 would not consent to her audio being posted" in texts, making him directly aware  
14 of Meador's lack of consent regarding her recorded conversations. Defendant  
15 Barresi applied financial worth to these unconsented audio recordings and that he  
16 was paying Berry for these unconsented recordings. Berry had withheld from Taft  
17 her communications with Defendant Barresi knowing she did not consent. Taft  
18 resisted regarding Meador's situation. In context to October 23, 2022, Taft  
19 explicitly told Berry on September 28th in response to Berry about "do you think  
20 Angela would let me interview her" that "Angela is scared and still has  
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1 nightmares" and that Meador does not want "public pressure" and "actually she's  
2 scared of it and was harassed," and "she didn't want her photos or email either  
3 poste[d] publicly or used..." and went into the details of stalking and harassment  
4 she experienced (after the assault by Csokas). Defendant Barresi did not listen to  
5 Taft and Meador's non-consent and Defendant Barresi manipulated Rebecca Berry,  
6 who alleged to Plaintiff she feared consequences to them. Berry wrote to Plaintiff  
7 she reported for Angela's safety to the FBI and gave them their phone numbers on  
8 October 9th. Alarming, Berry provided a recording speaking with Barresi on the  
9 death of Shalimar Seiuli falling off a roof, connected with Defendant Barresi's  
10 desire for Berry to give him wrongful access to "Angela," instilling risk to both  
11 Plaintiff and Meador, who Plaintiff befriended, cared about and supported Johnny.

12  
13 50. In early November 2022, Defendant Barresi was instructing publicists on  
14 narratives they could take, which involved Plaintiff and Meador. While  
15 simultaneously leveraging publicists (Melissa Nathan and Hiltzik  
16 Communications, David Shane) that he sent information about Plaintiff and  
17 Meador, Barresi threatened Plaintiff with deployment of security guards, explicitly  
18 directing them to harm Plaintiff for supporting, communicating positively with, or  
19 potentially meeting again with Heard. Barresi then sent these threats to Taft. This  
20 was particularly impactful following Plaintiff's assistance to Heard and to Meador.

1 51. Defendant Barresi sent directions to personnel surrounding Heard to  
2 retaliate against Plaintiff and repeated these threats directly to Plaintiff. In texts to  
3 Plaintiff, Defendant Barresi enforced authority, claimed there was a "special agent"  
4 sharing information about Plaintiff and Barresi knew the head of security well of  
5 Heard's. Barresi made inquiries about firearms asking "Did you get your mom's  
6 9MM handgun?" and "Where do you keep it?" (November 6th), and directed that  
7 he was making Heard be wrongfully "FRIGHTEN[ed]" of Plaintiff. November 6th,  
8 Defendant Barresi weaponized the unconsented recording between Meador and  
9 Plaintiff again, in emails to Plaintiff, and its transcription to compel answers from  
10 Plaintiff and actions. On November 6th, Defendant Barresi further texted Plaintiff  
11 that through his direction, security personnel had been "Alerted about some  
12 correlation you posted on twitter to another thing you told Angela Meador about  
13 method acting." On November 7th, within the texts, Defendant made explicit  
14 reference to her sister Stacy as well, who Plaintiff knew had personal trauma from  
15 their father. Barresi repeatedly dictated that security personnel, lawyers, and third  
16 parties would take action against Taft if she didn't comply. Defendant to Plaintiff  
17 in Email Nov 8, 2022 dictated: "You are not to ever EVER be in contact or  
18 remotely close again" to Heard, while simultaneously he did the same to Meador.

19 52. On November 11, 2022 (after the November 8th incident), Defendant  
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1 Barresi reinforced through audio statements from his unconsented recording of  
2 James Conner, Plaintiff's father, altering violence and "DEADLY" consequences if  
3 these individuals did not stay isolated from Plaintiff, that both private enforcement  
4 and publicists were called upon by Defendant. Defendant further weaponized this  
5 against Meador and Plaintiff. Secondly, Defendant Barresi diverted the identities  
6 of potential assailants psychologically, by connecting witnessing a mafia murder  
7 wrongfully to Plaintiff's mother, a photo of a dead victim from allegedly the mafia,  
8 and Barresi derangingly heightening risk comparing an assailant of a musician. In  
9 November, "PUBLICISTS AND FBI ON HIGH ALERT!" additionally announced  
10 Defendant Barresi's dissemination of his unconsented recording of Plaintiff's  
11 father to publicists and individuals. Defendants disseminated moreover sensitive  
12 content of the call of Plaintiff and her family relationships with individuals in  
13 unlawful unauthorized disclosure, since Barresi recorded this call from California  
14 with his suggestions to Plaintiff's father of what to say, with its two-party consent  
15 laws on both recording and disclosure, and instructed retaliation to Plaintiff.  
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22 53. Defendant Barresi published he was directing publicist David Shane and  
23 lawyer Axelrod against Plaintiff. This benefited rival publicists he was positioning  
24 marketing to and Waldman. An email he published took statements from the  
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1 unconsented recording of a private phone call with Conner and forced Plaintiff to  
2 her previous legal last name of Taft-Conner to enforce a connection to her father.  
3

4 54. Barresi actively worked to isolate friends and supporters from each  
5 other, telling Plaintiff "You've been warned Stay the fuck away from her" while  
6 claiming he is "in touch with her security leader who I know very well" regarding  
7 Heard, while simultaneously doing the same to Meador. Barresi suggested he  
8 manipulated personnel with false information and that repeated psychological  
9 trauma to Plaintiff. His false claims about his control of Plaintiff's father, FBI  
10 involvement and "international threats management specialist" on November 8,  
11 2022 (while weaponizing the unconsented recording with Meador and Plaintiff,  
12 and of Conner) and directing he enforced Heard to be "SCARED TO DEATH" of  
13 Plaintiff, further weaponized perceived authority to heighten fear targeting Plaintiff  
14 from supporting Heard and Meador. Barresi redirected to force support to cease  
15 from perceived consequences. Barresi's pattern against both women included  
16 asserting false authority. Toward Plaintiff, in November 2022, he threatened that  
17 security staff are out to get plaintiff to enforce isolation. On November 18th,  
18 Defendant Barresi reinforced his threats regarding Plaintiff and "her publicist  
19 David Shane," and "if someone gets killed it'll be on their heads" (published from  
20 PaulBarresi1 on twitter). Plaintiff felt terrorized that those she cared about could  
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1 get killed. Barresi established a coordinated intimidation strategy that not only  
2 prevented Taft's lawful association with Heard but simultaneously isolated and  
3 terrorized Meador, an assault survivor. Barresi weaponized non-consensual  
4 recordings of Meador's private communications with Taft, exploiting Meador's  
5 trauma from the assault and retaliation by Marton Csokas to create debilitating  
6 fear. Barresi's actions represent textbook psychological coercion by creating an  
7 environment where victims become "deathly afraid" and "scared to death" through  
8 persistent threats, unauthorized surveillance, and public humiliation.  
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12 55. Additionally, Barresi used these unconsented recordings of private phone  
13 calls and fabricated claims about Plaintiff's finances to encourage extortion  
14 attempts, including one by Richard Albertini demanding \$25,000 in cash. Albertini  
15 continued to threaten and warn Plaintiff into November 2022, December 2022, and  
16 until June 2023, then ceased after he was interviewed by the Dept of Consumer  
17 Affairs against Defendant Barresi. His voicemails conveyed he was aligned with  
18 Defendant Barresi and Waldman, and that there would be consequences to her and  
19 Heard regarding the amicus brief she was filing to help Heard with organizations  
20 signing onto it, unless she did his demand. Defendant Barresi's actions were  
21 designed to cause coordinated harm to Plaintiff, that were persistently long-lasting.  
22 On the other end, Barresi actively manipulated Meador through private  
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1 communications—texts, calls, and emails—portraying himself as an authority  
2 figure, pressuring her into withdrawing, and ultimately submitting a coerced  
3 declaration in prolonged harm. These acts were not only emotionally devastating  
4 but also interfered with Plaintiff’s academic, professional, business, social, and  
5 altruistic activities, and resulted in formal reports to federal and state authorities,  
6 including the FBI and California's Department of Consumer Affairs.  
7

8  
9 56. On December 12, 2022 at 3:58pm Barresi wrote to Taft:  
10

11 “INACT HEART, FRAGMENTED BONES & TEECH. ALL THAT WAS  
12 LEFT OF YOUR POOR MOM. BUT YOU MADE SURE YOU GOT  
13 AWAY WITH ALL YOUR BELOGINGS DIDN’T YOU WITCH? HOW  
14 CAN YOU LIVE WITH YOURSELF?”

15 57. On December 12, 2022 at 4:23pm, Mr. Barresi emails to Plaintiff her  
16 unconsented recording with Meador and other unconsented recordings in links of  
17 his disclosures, with financial and violence information repetitively. This includes:

18 “...attack Johnny Depp Witnesses” and unconsented  
19 recording of Plaintiff with Meador:  
20 “Millionaire Taft, instills fear in vulnerable woman as tool to  
21 coerce her into going along with lodging false allegations  
22 against Barresi for heinous crimes.”  
23 (<https://www.youtube.com/watch?v=wwaoiLRfg94&t=61s>);  
24 Linked to the repeated unauthorized disclosure of Meador  
25 speaking with Taft starting in this portion of their phone call,  
26 “He is a sociopath, and I think he should be in prison... I can’t  
27 begin to describe how dangerous this man is.”

1 Taft asked if she meant, “Marton Csokas or Paul Barresi” which Meador correctly  
2 identifies Csokas. This is an unconsented recording of Taft and Meador. In this is  
3 the re-traumatization of assault from Csokas and violent imagery of a gun to the  
4 head to Meador by an unidentified assailant, with her audio confirming she  
5 experienced this crime, forcing Taft to fear violence when wanting no harm to  
6 Meador. Plaintiff’s father’s unconsented recording was further in this email,  
7 causing Plaintiff to fear consequences further and trying to avoid further abuse.  
8  
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11 58. That same day, at 5pm, Defendant Barresi sent to Ms. Taft this email  
12 using texts between Plaintiff and Meador: “hahahahahahahahaha. *YOU ARE*  
13 *FRUSTRATED AND MENTALLY UNSTABLE AND SHOULD BE LOCKED UP.*  
14

15 *Hi Angela, Barresi may be arrested tomorrow for breaking Richie’s*  
16 *restraining order. There’s a warrant that will be issued... I also*  
17 *mailed in a report to consumer affairs/BSIS on Barresi yesterday*  
18 *Have a great night and hope you sleep well!! Aaron said he can and*  
19 *will pray for you tomorrow morning. I’m not religious but he is here*  
20 *for you too ❤️📧❤️📧 Aaron’s phone number is: +18033676728*  
21 *The police are at Richie’s now and reports/cases filed. Barresi*  
22 *called Rebecca Berry again (our friend/journalist) asking. When I*  
23 *dropped richie off this weekend there was a rainbow 🌈 which was*  
24 *a sign I hope 🙏 It’s crazy all the running around everyone has to do*  
25 *go this guy. Yeah it’s sad that it’s taking a group of us to do anything*  
26 *now. Well. If it wasn’t a group he’d be terrorizing everybody still.*  
27 *Yes it’s really true. Only now are we getting completed reports and*  
*it being clearer. Everyone has different skills and personalities.*  
*These people have usually preyed on isolated victims I get frustrated*  
*as it’s taken so long and there’s a huge impact here. I hope there can*  
*be a better outcome and wrap up ”*

1           59. At this point, Taft is highly traumatized by Barresi. No more supportive  
2 communications were allowed by Defendant between Taft and Meador, who she  
3 cared about and spoke with positively for months nearly daily, making Plaintiff  
4 feel helpless, and it conveyed Meador being held hostage and as leverage. To this  
5 day, this brutality and cruelty gives Plaintiff panic attacks, PTSD, depression,  
6 prolonged pain, and worry for Meador.  
7

8  
9           60. Beginning in December 2022, a released recording revealed a disturbing  
10 conversation between Paul Barresi and Adam Waldman, where Barresi invoked  
11 William Hazlitt's philosophy to justify psychological damage through repetition,  
12 while Waldman admitted there were orchestrated acts against witnesses—  
13 including break-ins and vandalism—targeting those who could be perceived as  
14 potential Johnny witnesses, and efforts to alter perception as this being from their  
15 opponents. Plaintiff was included in this unconsented recording of Waldman. This  
16 recording, published by Barresi, included visual evidence of such harassment and  
17 was seen by Taft as part of a coordinated campaign of witness tampering.  
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22 Following this, Barresi publicly shared unconsented recordings of a private call  
23 between Taft and Angela Meador, re-traumatizing both through graphic content  
24 depicting assault and a gun being pointed at Meador's head. This exploitative  
25 publication, repeated on multiple dates, caused severe psychological harm.  
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1 61. In late December, Defendant Barresi again disseminated an unconsented  
2 recording of a phone call between Meador and Taft, preying on Angela Meador's  
3 vulnerabilities related to her assault by Marton Csokas and the trauma of having a  
4 gun pointed at her head, without knowing the identity of the attacker on behalf of  
5 Csokas. Seeing this repetition by Defendant caused Plaintiff to freeze shockingly.  
6  
7

8 62. On closer observation, Defendant Barresi altered the unconsented recording  
9 of the phone call of Plaintiff with Meador to further his own agenda and included  
10 violent outtakes of his acting. Defendant Barresi inserted scenes of reenactment  
11 from "THE HITMAN'S VIOLIN (OUTTAKES)".<sup>1</sup> This insertion of violent  
12 outtakes from Defendant Barresi disturbed Plaintiff, particularly in reference to the  
13 earlier "what you told Angela about method acting" text to Plaintiff, suggesting  
14 Defendant's escalation from acting violence to actual realized violence. This  
15 heightened Plaintiff's trauma, as further, her knowledge on actors being like their  
16 characters was from her mother's knowledge and reinforced potential violence.  
17 Secondly, this reinforced trauma into Meador, taking away her lived experience,  
18 and who in their private conversation, both conveyed that Csokas typically had  
19 violent roles, with lacking empathy. Defendant associated Plaintiff to this violence  
20 repeatedly to Meador, which traumatized Plaintiff for not wanting any harm to her  
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27 <sup>1</sup> <https://youtu.be/Ib6fLTllfRQ?si=QZPnFrkJ1CgKsbcP>

1 and being unable to separate Meador from the violence.

2 63. Defendant reinforced his monitoring of Plaintiff and retaliatory  
3 consequences, by repeating her name explicitly at least over 351 times over the  
4 years of 2022 to 2025, at least 48 times in 2022 and 107 times in 2023, and when  
5 related Plaintiff to her associates, friends, and loved ones at least 900 times.  
6  
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8 64. By late December, Taft, fearing for her safety after seeing Barresi search  
9 for her location beneath a published video, fled California for Hawaii. Days later,  
10 Barresi falsely implicated her in vandalism and released more threatening content,  
11 citing coordination with Waldman. He accused Taft and her associates of criminal  
12 conspiracy and orchestrated a smear campaign involving manipulated evidence.  
13  
14 On December 30, 2022, Barresi was rewarded with a call from Johnny Depp,  
15 reportedly encouraged by Waldman—further escalating Taft’s fear and affirming  
16 the link between these attacks and high-profile figures.  
17  
18

19 65. Barresi’s campaign continued into 2023 with further publication of  
20 edited, unauthorized audio, and threats against Taft and her associates, resulting in  
21 police and FBI reports, emotional trauma, financial distress, and eventual  
22 relocation to Hawaii and then Europe to escape the abuse. In January 2023,  
23 Plaintiff obtained an emergency studio in Waikiki and changed residencies to  
24 Hawaii, despite a lease still in Los Angeles.  
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1           66. Between January and ending completely in July 2023, the Plaintiff  
2 considered establishing a production company to produce films and associate  
3 produce with Alexa Polar. This plan was pursued quietly due to ongoing attacks  
4 from Defendant Barresi, while the Plaintiff also sought legal counsel to address  
5 these attacks. Plaintiff attempted to maintain professional interests, including  
6 supporting people in the Arts who may have experienced abuse, despite  
7 interference from the Defendants. Plaintiff read scripts for movies that could be  
8 prospectively provided for casting, especially to Heard. Defendant Barresi by  
9 March tracked Plaintiff to residing in Hawaii, despite the lease in Los Angeles.  
10

11           67. On March 3-7, the Plaintiff and Alexa Polar discussed potential  
12 investors, noting that talent agents were requesting more than the \$200,000  
13 offered. They also analyzed the film "Promising Young Woman" (produced by  
14 Margot Robbie), specifically discussing how it failed to fully address the impact  
15 of retaliation on the main character, of emotional suffering that ended her life.  
16

17           68. Defendants were tracking Plaintiff's interests in the Arts on her Rescue  
18 Social Inc. repository, and her mother Victoria's social connections. Sometime  
19 after March 2023, two articles had recantations in the Associated Press and ABC  
20 News. One was a 2019 tribute article about Victoria Taft with original  
21 interviews from her brother Don Debaun and friend Lori Mattix, and mentioned  
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1 the lawsuit against the production company, Walt Disney Co et al, for her studio  
2 set injury while filming *Dick Tracy*. The second recantation was a 2006 article  
3 connecting Defendant Barresi to crimes in his work with Pellicano. For Plaintiff,  
4 losing her mother's article was devastating, and another attempt to change reality  
5 to become vulnerable to Defendant Barresi's psychological force.  
6  
7

8 69. On March 11, 2023, Mr. Barresi stated Ms. Taft's location was in  
9 Hawaii. Ms. Taft saw this as she was moving boxes out of her West Los Angeles  
10 Apartment by Playa Vista. She was staying at a friend George Carrier's, husband of  
11 friend Kimmy Hughes's, a college friend of Michelle Diamond's who met her  
12 mother, in their guest house north of Pasadena, fearing Mr. Barresi's derangement  
13 and looking for her location, had an eerie feeling of watching her back.  
14  
15

16 70. On March 15<sup>th</sup>, Ms. Taft goes to an interview appointment in Ontario,  
17 California by investigators for the Department of Consumer Affairs about Mr.  
18 Barresi and questions. Plaintiff immediately prefaced that Defendant Barresi  
19 records all of his phone calls illegally, however, that was pushed back for later  
20 discussion. Plaintiff was very silenced about Angela Meador and how Defendant  
21 was harming them with their unconsented phone recording, and she was not  
22 questioned about it, instead, the investigators went into *Depp v Heard*, putting  
23 Plaintiff onto the defensive. Plaintiff asked if they had the list of witnesses she  
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1 provided them, which they confirmed having. Plaintiff went into photos of  
2 vandalism and damaged property. Shortly thereafter, Plaintiff sent a supportive  
3 message to Jennifer Howell that she shouldn't fear or be afraid, to use cameras, and  
4 Howell removed postings about stalkers after reading Plaintiff's message.  
5

6  
7 71. On March 26, 2023, the Plaintiff and director Alexa Polar expressed  
8 interest in focusing on employing individuals for films with positive outcomes.  
9 During this exchange, Polar informed the Plaintiff that she had taken control of  
10 producing "Marilyn Mexico" and was working to raise a \$1 million budget for a  
11 role intended for Heard. Plaintiff was still experiencing PTSD and pain rising from  
12 exploitation by Defendant Barresi and no solutions to what was occurring,  
13 especially to what started with the unconsented recording between her and Meador,  
14 who further confided to Plaintiff she experiences PTSD.  
15  
16

17  
18 72. By May 2023, Plaintiff's contract from August 2020 with SaveMeNow  
19 and Niko Sanchez, the rescue instructor, languished, as Plaintiff could not work  
20 on it, since Defendant Barresi was monitoring her relationships, activities, and  
21 publicity and Sanchez resultingly struggled. Plaintiff was a coordinator, however,  
22 her role involved partnerships and publicity. Further, it required clarity to save  
23 lives with improved communications, accuracy, and speed. The enablement of  
24 psychological violence by Defendant Barresi, especially of people she cared  
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1 about, and of witnesses and victims of assaults, was profoundly damaging.

2  
3 73. On May 18<sup>th</sup>, Plaintiff reaffirmed her support and earlier pleading to  
4 Herndon to tell the DCA to help Angela, as it was “so extortionary, scary, sad and  
5 invasion of privacy” since she was too afraid to mention her to them or show all  
6 the things Defendant Barresi did regarding her since he threatened “‘criminal  
7 conspiracy’ to shut up’” and thanked Herndon’s “encouragement-it’s against  
8 permission of both of us to exploit that audio tape and post it online.” On May  
9  
10 12th, Mr. Herndon reported to Department of Consumer Affairs Investigator Mr.  
11 Jesse Adams against Defendant Barresi. During this report, Mr. Herndon  
12 specifically reported to the California Department of Consumer Affairs against  
13 Defendant Barresi regarding the allegation that Defendant Barresi was the  
14 unidentified assailant who pulled a gun on Angela Meador. This incident  
15 occurred after Angela Meador had suffered assaults, torturous violence, and  
16 retaliation by Marton Csokas. While Angela Meador did experience an assailant  
17 putting a gun threat, the specific allegation identifying Defendant Barresi as that  
18 allegation originated from a group that she knew between November 2020 to  
19 2021. Mr. Herndon later texted Ms. Taft that “If a real representative of the  
20 authorities speaks to Angela and can make her feel safe, I think she’ll retell the  
21 truth of everything about everyone.” Unfortunately Plaintiff doubts that the DCA  
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1 investigators contacted Meador to help her. Plaintiff had provided Meador's real  
2 phone number to them hoping they'd call her officially.  
3

4 74. Between May and June 2023, Plaintiff introduced journalists Alexi  
5 Mostrous and Katie Riley of Tortoise Media, to sources including Zhouhan Chen  
6 who proudly had Worldie Ltd as a partner and that he was trying to help safety on  
7 his organizational page. Plaintiff was too afraid to go onto the record herself or be  
8 on a phone call or video call with these journalists due to Defendant Barresi's  
9 threats of false conspiracy to harm a victim she sponsored. Defendant Barresi had  
10 strategized to obtain outtakes from media and documentaries. Aside of  
11 professionalism, Plaintiff was deteriorating again from the abuse by Defendant  
12 Barresi.  
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16 75. By late May and June 2023, Plaintiff had prolonged re-traumatization  
17 due to violent, changing identities, and murder-related content in unconsented  
18 phone recordings by Defendant Barresi that he repeatedly exploited without  
19 consent, intensified fear of retaliation against Joseph Triscari (a former romantic  
20 partner of her rational mother Victoria Taft) and herself, as Defendant Barresi and  
21 Conner could potentially retaliate together. Plaintiff was re-traumatized further by  
22 his harm of weaponizing her phone call with Meador, a friend she cared about.  
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26 This led to extreme vulnerability to Plaintiff, who had been separated from her  
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1 father by her mother for her safety, and her half siblings had been separated for  
2 their safety as well by their mother. Plaintiff repeatedly was deeply alarmed and  
3 re-traumatized by Defendant Barresi shifting the identity of potential assailants  
4 through his actions and unconsented recordings he weaponized for psychological  
5 coercion. After the traumatization by Plaintiff's father towards her and her sister  
6 in 2013-2014, Plaintiff experienced near mortality and being killed, and being  
7 unable to identify the assailant, although the suspected person was in front of her  
8 at a train station, and blame shifted more easily to those in prior communications  
9 and disputes, to family members and actually innocent parties, and knows this is  
10 extremely psychologically coercive.

15 76. Underneath this violence was credible fear from Plaintiff, that  
16 Defendant Barresi could obtain experiences of sexual abuse and harassment  
17 toward her and her sister, Stacy. Each time Defendant Barresi did this, while  
18 using violent implications to cover-up abuse, Defendant Barresi repeatedly used  
19 Plaintiff's father's unconsented recording to harm her, Meador, and her  
20 associates, to convey consequences of deadly violence.

23 77. Around June 12th, licensed private investigator Michael Kountz visited  
24 James Conner in New Mexico, and played the video Defendant Barresi used to  
25 exploit his unconsented phone call recording, confirming that Conner disputed it  
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1 used by Defendant Barresi to impersonate him. Conner stated he was unaware of  
2 this recording being used, felt threatened by it, and denied the accuracy of the  
3 statements attributed to him. Kountz's report revealed that while Conner had  
4 been married to Victoria Taft, who had been a model and socialized with many  
5 figures, he had minimal interaction with the Tafts and was never an FBI agent  
6 but rather a licensed investigator (since 2014). The investigation uncovered that  
7 Barresi had obtained sensitive information, for example Plaintiff's mother's  
8 friendship with Michelle Diamond into questioning their sexuality and Barresi  
9 was attempting to collect \$25,000 from Plaintiff. Conner described Barresi as  
10 "dangerous" and "a loose cannon" who was "invading people's privacy" to "get  
11 information to sell it" and was so frightened by Barresi that he planned to flee to  
12 his property in Alaska, giving Kountz an Alaskan phone number.  
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18 78. Conner confirmed he was unaware of being recorded, did not consent to  
19 the recording or its use, stated the audio was taken out of context and didn't  
20 reflect their actual conversation, and expressed fear for his safety from Barresi,  
21 even fleeing to Alaska. Barresi's unconsented recording of a phone call with  
22 Plaintiff's father and subsequent video with its content contained fabricated  
23 stories about Taft's deceased mother Victoria witnessing a Gotti family mob  
24 murder, and threatening content including photos of a dead victim, mafia  
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1 members, guns, and an assailant killing a musician, while also discussing a  
2 photo of Taft with Heard in a context that implied danger to their lives—leading  
3 Taft to fear the tape was designed to incite violence against her or to women she  
4 cares about. Defendant Barresi connected the content to a woman that Plaintiff  
5 donated to and wanted to help, to create a continued trauma of helplessness and  
6 twisted roles to Plaintiff unwantingly. Barresi continued inflicting harm to Taft  
7 through 2024 with additional use of the recording, including communications  
8 targeting her, her half-siblings and vulnerable women. Upon receiving this  
9 report, the Plaintiff was overwhelmed and slept for hours, realizing how close  
10 she had come to extortion and abuse despite her attempts to escape it.

15 79. On June 13, 2023, Plaintiff signed a “JCBITSC Confidentiality  
16 Agreement” as the “CEO Worldie Ltd” and “All personal information will not be  
17 sold or distributed, and JCB International Training and Security Consulting  
18 agrees that confidential information shall be used solely for the purpose for which  
19 it was submitted.” Juan Brooks emailed it was a private investigator agreement,  
20 “You had alluded to potential for executive protection as well...” Plaintiff  
21 emailed to depict an example of a 'do no harm' agreement that individuals  
22 working for or with her have been asked to sign or acknowledge over the years -  
23 intended for social good and to prevent harm to female victims or any related  
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1 alliances, individuals, entities, etc. Brooks reported to Plaintiff that there was  
2 “federal authority watch” on the same street as Barresi and surveilling Barresi at  
3 the same time he was. Brooks proceeded to investigate Defendant Barresi, and  
4 drained her financial accounts. He alleged that he used disguises as a former  
5 diplomatic security specialist and executive protector, to surveil Defendant  
6 Barresi in California, New York, Washington DC, and Georgia. Plaintiff had  
7 been conditioned by Defendant Barresi at this point, and isolated, and that  
8 Defendant Barresi was dangerous. Defendant Barresi proceeded to weaponize  
9 unconsented recordings of Anthony Fox’s family, doing disclosures, and  
10 inabilities to clarify issues for the Ventura police missing person investigation.

15 80. Juan Brooks conveyed his surveillance was pressuring Defendant  
16 Barresi for protection of people Plaintiff cared about and herself. Plaintiff was  
17 compelled to pay and for accuracy about federal investigations, due to Defendant  
18 Barresi’s repeated manufacturing and unconsented recording of telephone calls,  
19 starting with hers and Meador’s, and she could not receive adequate legal support,  
20 due to the names involved. E.g., Plaintiff had to report to two bar associations.

23 81. On July 21, 2023, Angela Meador surfaced that she had 9 months of  
24 struggles in the darkness and her friend encouraged her to come back into the  
25 light with sympathy. Meador shows she struggled that she was, “laying low,”  
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1 with her intent to “come back out when safe.” AngelaGayle01 indicates "hiding"  
2 after October 2022, after the obtaining of the unconsented recording of Plaintiff  
3 and Meador’s phone call, unauthorized disclosures, and subsequent contact with  
4 Defendant Barresi. By March 25, 2023, Angela Gayle Official Music Site was  
5 down and on *Internet Archive*. This is meaningful for Plaintiff that Meador could  
6 have a life. Plaintiff stayed in her condo during this time and similarly laying  
7 low, sadly reviewing movies from Golden Hollywood when blackmail was a  
8 public concern, before Pellicano and Barresi, and struggling that if she didn’t  
9 have help from personnel, that there would be suffering caused by Defendants.  
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14 82. In August 2023, On August 7, 2023 Juan Brooks texted Plaintiff that he  
15 reported Defendant Barresi to three federal agents with their superior. On August  
16 9<sup>th</sup>, Defendant Barresi again uses the unconsented phone call recording of Adam  
17 Waldman, "*Adam Waldman acknowledges Paul Barresi...*"  
18

19 <https://www.youtube.com/watch?v=9BpDGPHVaxk> "*Adam Waldman*  
20 *acknowledges PI Paul Barresi...*" <https://youtu.be/rnQa5J8eS0g> Again, are the  
21 frightening images of crimes of vandalism, break-ins, and escalations that are  
22 violent in nature. Moreover, Defendant correlated threats of “physical violence”  
23 to happen to alleged “Johnny witnesses” and to Plaintiff Taft unwantingly in this  
24 unconsented recording. Defendant Barresi proceeded to implicate Waldman in  
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1 usually chargeable activities, by claiming he's a "consigliere" and re-posting his  
2 email from Waldman accolading him and his Daily Mail article of 100 people he  
3 allegedly was involved with, to join him. In context of the investigation  
4 revealing Defendant Barresi's tactics, Plaintiff experienced freezing and  
5 increasing depression that Defendant Barresi is harming those she cares about  
6 and Brooks appeared driven to care about Depp, with more interest in men who  
7 had to comply with Barresi's derangement, which was not solving the harm to  
8 vulnerable individuals in need. Plaintiff was being financially destroyed, and felt  
9 threatened by both Barresi and her investigator, who was out of her control.  
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14 83. In September 2023, Angela Meador attempted to surface more  
15 meaningfully and "to come back out of hiding," as conveyed in her posting on  
16 AngelaGayle01. Her friend encouraged her to be social to get Meador out of  
17 hiding, and back to her interests. Plaintiff wanted that Meador could live freely.  
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20 84. Plaintiff hoped that the focus by Brooks onto Defendant Barresi, meant  
21 that Defendant Barresi stopped his intense focus onto people she cared about not  
22 seeing retaliation to. Plaintiff hoped for justice and resolution. She hoped that the  
23 investigation helped Meador to not be directly contacted by Defendant Barresi.  
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25 85. By September 2023, Plaintiff was drained from Brooks, who warned  
26 her that if she stopped funding him, that Defendant Barresi would continue to  
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1 harm others she cared about and her. This was a credible threat given the history.

2 However, Plaintiff could not pay anymore, and the stress was unbearable.

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4 86. The professional impact on Taft was significant, as her business  
5 ventures, including Worldie Ltd, continued to suffer, with documented losses of  
6 over \$200,000 by 2024 due to Barresi's interference, including the disruption of  
7 potential grants for SaveMeNow valued between \$100,000 and \$10,000,000.  
8 Emotionally, Taft's PTSD, depression, and freezing worsened.  
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11 87. In October 2023, Defendant Barresi, in his aggressive derangement,  
12 heeded to turn to harm people Plaintiff cared about more and her, in closer  
13 proximity, and with the unconsented recordings of violent consequences. After 6  
14 more publishings of the unconsented recording of Plaintiff's father, Defendant re-  
15 disclosed the unconsented recording of Meador with Taft. Before Meador and  
16 Taft's unconsented recording in a video he published he headlined "stalker" and  
17 "save a life" as if projecting Taft's wish for rescue services to improve lives as a  
18 'stalker.' After Meador and Taft's unconsented recording was re-traumatization,  
19 of violence and unknown assailants in the content, he connected "abandonment"  
20 and "leaving to die." After the unconsented recording use of Meador and  
21 Plaintiff, was Defendant's headline containing "I want my mom back," "final  
22 moments," and "let burn to death." This was re-traumatizing to Plaintiff, who  
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1 knew it was psychologically damaging to Meador and to her, and that Plaintiff  
2 had “abandoned” Meador and there was suffering consequences to her.  
3

4 After these 9 publishings with Meador and Plaintiff’s unconsented recording and  
5 causing re-traumatization, on October 19, Plaintiff urgently pled she needed to  
6 get a restraining order “as Barresi re-posted the gory edited video of his recording  
7 of Conner 8 times and another video 1 time...” which was Meador and Plaintiff’s  
8 unconsented recording, to which there was little to no response or assistance.  
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11 88. In the 2<sup>nd</sup> use in this month of publicly disclosing Meador and Taft’s  
12 unconsented recorded phone call with violence attached to it and identity  
13 confusions, Defendant Barresi then went after a police report against him, and re-  
14 published the unconsented recording of Plaintiff’s father approximately 17 times.  
15 Defendant Barresi’s actions created PTSD, hyperarousal, and flight/freeze/flight  
16 symptoms, connecting Meador’s suffering as people she cares about, to Plaintiff’s  
17 mothers suffering for not helping her effectively, when it would mean silencing  
18 herself to protect Meador. Moreover, Plaintiff suffered in in her work related to  
19 public safety, and her uncle, her mother’s brother, Don Debaun, stopped  
20 communicating with Plaintiff even for holidays due to Defendant Barresi.  
21  
22 Barresi’s actions on psychological intimidation and threats of public humiliation to  
23 suppress Taft’s constitutional rights to free association and movement, intimidating  
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1 her into silence and isolation, and indirectly reinforcing the suppression of  
2 Meador's right to report Csokas's assault by perpetuating a climate of fear that had  
3 persisted since 2015. The documents demonstrate that Meador was experiencing  
4 intimidation designed to prevent her from reporting the assaults she suffered. In  
5 Plaintiff and Meador's unconsented recording that Defendant Barresi obtained,  
6 "They came after me before I even got out of the hospital," with harassment  
7 continuing "almost every day" for nearly two years.

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11 89. On October 27th and October 28th, 2023, there were approximately  
12 two more times that Plaintiff and Meador's unconsented recording of their private  
13 conversation was exploited and unauthorizedly disclosed by Defendant Barresi. It  
14 conveyed forcing Meador to falsely believe she'll be involved with crimes, which  
15 again reinforced that Defendant Barresi was forcing Meador to be connected to  
16 others' statements, while reinforcing traumatization of violence. Plaintiff felt  
17 helplessness to stop Defendant Barresi and couldn't obtain help beginning with  
18 her unconsented recording of her phone call with Meador, being unauthorizedly  
19 disclosed, with attempts to find legal counsel, discovering their conflicts of  
20 interest with convicted Pellicano, Barresi's affiliate, which created more panic in  
21 Plaintiff. In Plaintiff's desperation, she conveyed about retainers of \$100,000.

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26 90. The emotional toll on Meador was profound, as these October 2023  
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1 releases extended the trauma she described in her July 2023 surfacing, this was  
2 coerced to further limit Plaintiff's ability to protect Meador, fearing additional  
3 harm to her friend, which chilled her constitutional right to free association and  
4 business in the Arts community. Meador again went underwater. By November  
5 16, Plaintiff was similarly exhausted, finding no relief from any of Heard's  
6 personnel, improper lawyers, and reported attorney misconduct in her desperation  
7 to find representation to help them against Defendant Barresi, solely. Plaintiff  
8 continued to source to Golden Era loving figures Grace Kelly and Audrey  
9 Hepburn, with announcing travel. "I'd like to be remembered as someone who  
10 accomplished useful deeds and who was a kind and loving person. A human  
11 being with the correct attitude and who did her best to help others." – Grace  
12 Kelly. Plaintiff, not wanting to recant, locked herself out of her Twitter account.  
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18 91. On November 22, 2023 Plaintiff reported to Honolulu police and on  
19 surveillance video advised she should go to the FBI office in-person. The two  
20 police officers watched the unconsented recording of Conner and recorded over  
21 \$200,000 lost from bank account statements due to Defendants' illicit activities.  
22 Plaintiff protected her and Meador's recording from this report, as she didn't  
23 want Meador involved in any suspicions and it further complicated matters.  
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26 92. On November 29, 2023, Barresi sent three unsolicited, threatening  
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1 emails to Taft. Mr. Barresi emailed Ms. Taft expressing fears for her life,  
2 prompting her to file police reports in Honolulu and leave for Europe. On  
3 November 29, 2023, Barresi sent an email about "VITORIA TAFT SOFT PORN  
4 ACTRES" with a link to "Sizzle Beach USA," followed by a threatening message  
5 approximately 20 minutes later suggesting he would release this information  
6 publicly. Defendant Barresi wrote, "How does this sound?" to Plaintiff. He  
7 threatened to falsely connect Plaintiff and her mother to Playboy work with him  
8 and referenced how she fled out of the state fearing for her life. This reopened  
9 trauma about abandoning her mother, while simultaneously coercing in relation to  
10 friends and victims of abuse. Barresi made crude remarks about Victoria's  
11 appearance in "Malibu Hot Summer" and mentioned her work as Glenn Headly's  
12 double in the 1990 "Dick Tracy" film, to pressure about suing Warren Beatty,  
13 suggesting that Defendant Barresi can credibly obtain media exposure due to the  
14 association and his false connections. The third was formatted as a tabloid-style  
15 article, weaponizing private details about her deceased mother, Victoria Taft and  
16 Plaintiff. The message used sexually derogatory language, distorted facts about  
17 her mother's workplace injury lawsuit, and implied imminent publication through  
18 major outlets to intimidate Taft into silence. The format was as a draft article  
19 seemingly ready for distribution to publications like American Media Inc, New  
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1 York Daily News, RadarOnline, and Daily Mail as Defendant Barresi sells to.

2 93. Barresi's conduct exploited personal tragedy for coercive purposes, using  
3 false associations with celebrities and commercial pressure. This was part of an  
4 ongoing campaign involving the unconsented use of recorded phone calls between  
5 Taft and others, including her friend Angela Meador, an assault victim, to apply  
6 psychological pressure, inflict reputational damage, and isolate Taft from support  
7 networks.  
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11 94. On November 23, 2023, Plaintiff met with Claudia Jamisen in New York  
12 City for Thanksgiving after the Macy's Day Parade. Sensing Defendant Barresi's  
13 aggression from his attempts and having weakness, hiding from the CEO role,  
14 Plaintiff changed email accounts to "life" to psychologically protect herself and  
15 divert his threats, with a safety notice. In late December 2023, Defendant Barresi  
16 again coerced Angela Meador and Plaintiff. Plaintiff saw Defendant Barresi  
17 exploiting the unconsented recording of the phone call of Meador and Plaintiff  
18 with threats from him of consequences. On December 31st, unauthorized  
19 disclosure of the unconsented recording re-occurred four more times. Plaintiff was  
20 traveling, and dreaded the harm that was arriving from Defendant Barresi. Again  
21 Meador was forced to be vulnerable and used by Barresi, and Plaintiff worried.  
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1 95. By December 2023, Defendant's conduct has not only harmed Plaintiff  
2 and Meador personally, but has also devastated Plaintiff's professional endeavors.  
3  
4 Plaintiff's public safety platform, Worldie Ltd, saw ten major international  
5 partnerships dissolve. Worldie Ltd's partnerships had involved SaveMeNow, Peace  
6 Education and Practice Network, The Girls Can Initiative, Community Solutions  
7 Africa, Women CyberSecurity Society, Code Your Dreams, Systemic Diversity  
8 and Inclusion Group, Tycho Softworks, LOGICMOO, Cyber Future Academy, and  
9 indirectly the United Nations Sustainable Development Goals. In correlation, by  
10 December 6<sup>th</sup>, 2023, Worldie Ltd's about pages for its partnerships was completely  
11 down and other pages hidden. The shutdown of Plaintiff's digital platforms  
12 followed an escalation of Defendants' vicious intrusive campaigns, leveraging  
13 lives with suffering, irreparably harming her career, contracts, and public image.  
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16 96. Barresi's repeated threats, including leveraging materials and  
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18 unconsented recorded phone calls causing suffering, and violent, sexual content  
19 accompanying control over loved ones and associates, left Taft in severe emotional  
20 distress, and returning to the United States, Barresi continued his campaign,  
21 knowing her address, contributing to her eventual partial re-location to Europe to  
22 escape. Defendant Barresi explicitly named Plaintiff approximately and at least  
23 107 times in 2023 and 122 times in 2024, and hundreds non-explicitly.  
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1 97. From January to the end of February, Defendant Barresi sent over 21  
2 emails to Plaintiff and he continued to contact Meador. Plaintiff saw Defendant  
3 Barresi's threats escalating and submitted on January 2<sup>nd</sup> a citizen report to  
4 Honolulu police (24-002891). On January 3<sup>rd</sup> Defendant Barresi issued threats of  
5 consequences with recordings and to perceived associates of Plaintiff. A single day  
6 can average 9 emails from Defendant Barresi accompanied by the continuing  
7 exploitation of audio tapes. Jan 7, 2024 at 8:11 PM Barresi writes to Plaintiff in  
8 email: "Drop dead you ugly little bitch. Your poor mother must be burning alive  
9 again and her misguided soul wondering aimlessly in the universe..." This was  
10 causing Plaintiff distress, PTSD of losing loved ones, and that she couldn't escape.  
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15 98. Approximately January 8th, 2024, after Plaintiff had been trying to not  
16 think that Depp was trying to make her die and suffer through Defendant Barresi,  
17 the repeated threats by Defendant Barresi made her express that Defendant Barresi  
18 was psychologically harming her. Plaintiff had enjoyed meeting with Claudia  
19 Jamisen. She expressed that it seemed that Defendant Barresi wanted Plaintiff to  
20 end herself, "Would that also please Johnny Depp?" Plaintiff was already  
21 scheduled to purchase a Dior item that day, so she was not home when Defendant  
22 Barresi did a false call on her. In all bold, Defendant Barresi wrote in email to  
23 Plaintiff "I had Officer Leonard" go to her address " [REDACTED] -  
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1 [REDACTED] " and "Your pop said" with "Maybe you  
2 should've gotten a first floor apartment." He again used an insult to Plaintiff from  
3 Waldman from the unconsented recording of him by Defendant Barresi. Plaintiff  
4 never said anything about falling from her apartment. Defendant Barresi wrote to  
5 his followers that he made them "have their hands on the trigger" which threatened  
6 Plaintiff since that could result in a false shooting of her to end her based on  
7 fabricated information.  
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11 99. Plaintiff wrote to Defendant Barresi: "Barresi: You are in several police  
12 reports admitting that you told people you... caused her death" and quoted "on  
13 behalf of actors'" with then stating separately in a different paragraph about a case  
14 against him and JD. Plaintiff purposely separated the two issues, and it was not  
15 meant to be used by Defendant Barresi to exploit Meador as a "Johnny witness."  
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18 100. On January 9<sup>th</sup>, Defendant Barresi wrote to Plaintiff in email about him  
19 not being deemed by a judge to be a "killer" (although he was deemed 'sick') and  
20 brought in her unconsented recording with Meador, "Never a more pathetic human  
21 being has ever breathed air. Everyone who hears the telephone recording of you  
22 trying to coerce Nashville recording artist Angela Gayle into sidling up" with  
23 issuing threats to Plaintiff that she should be locked up. He further stated "sidling  
24 up with you and Albertini to falsely accuse me of putting a gun to her head," which  
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1 was deranged to Plaintiff and threatening. Approximately 30 minutes later in  
2 another unsolicited email, that Plaintiff was 'brain dead,' Defendant Barresi wanted  
3 Plaintiff to look under a video he published at a journalist named Megan Fox's  
4 statement about no financial transactions, which Plaintiff was not frightened of Fox  
5 since the previous concerns to Fox directly were financial transactions, started by  
6 Defendant Barresi's activities, between Marty Singer and American Media Inc.  
7 Plaintiff went back to her concerns for Meador, first referencing his illicit activities  
8 with Pellicano, then "Recording artist did not want her audio stolen by you and  
9 evidence fabricated. You are illegally blackmailing and coordinating harassment.  
10 Honolulu PD already have your information and they are ethical - they told me to  
11 go to the FBI."

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16 101. Defendant then sent four unsolicited emails within 30 minutes, that she  
17 is an "idiot" and he again used false authority to influence enforcement, using a  
18 statement from his unconsented recording of Waldman, then that "security staff" of  
19 Heard's were now monitoring her, with an unknown "Justin" that Plaintiff "better  
20 stay there." Within six minutes, Defendant Barresi went back to Meador's  
21 helplessness, "That recording of you coercing Angela Gayle was shortened because  
22 in so many places you are so stupid you couldn't even cogently speak a complete  
23 sentence. Make no mistake the full recording is intact and in evidence, you fucking  
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1 dolt.” Plaintiff tried to refute Defendant Barresi, that he misrepresented to Meador  
2 and of his cruelty. Defendant Barresi then used more false authority that “Amber's  
3 bodyguards are on the look out for you,” then within fifteen minutes, Defendant  
4 Barresi demonstrated Meador’s helplessness to Plaintiff with attaching four photos  
5 of text messages between them from approximately October 19, 2022. Within  
6 Meador’s texts, titled ‘exhibits’ are “I haven’t done anything wrong. I told my truth  
7 and you and Richie lied to me and recorded me without my permission,” “someone  
8 within your group fabricated information to take Barresi down,” “do you know  
9 [sic] the fear I’ve had to live with over the last few years because of what y’all have  
10 done,” that Waldman and Depp has nothing to do with her, and “do you understand  
11 how your group has inflicted pain me?” The fourth was Plaintiff’s message to ask  
12 friends for help and to not recant the threats and intimidation, to change the  
13 identity, and that it was said to all point to Defendant Barresi. Meador asked  
14 Plaintiff “will that help?” Two minutes later, Defendant Barresi sent Plaintiff  
15 another unsolicited email that she’s stupid, and the same four photos of text  
16 messages from Meador.” This was painful to Plaintiff, as she knew she was a  
17 friend to Meador, and Meador asked her for help, but the high pressuring from  
18 Defendant Barresi influenced her and Plaintiff could not find any adequate help.  
19 Plaintiff attempted to refute Defendant Barresi that he would be in another  
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1 harassment report to the police and tried to distract Defendant Barresi to Juan  
2 Brooks 'allegations, and that he made people think 24/7 security is needed.  
3  
4 Plaintiff's forwarded emails to the DCA missed Meador and her's text messages.  
5 This was becoming very overwhelming and traumatic for Plaintiff, to see her  
6 friend's helplessness and barrage from Defendant Barresi.  
7

8 102. After dismissing police reports and complaints, on January 9<sup>th</sup> at  
9 2:51pm, Defendant Barresi then went back to Plaintiff's family in emails to her,  
10 again forcing Plaintiff to think of her father, and with threats to forge false sexual  
11 activity of her mother with coercion that he's a former porn actor and a false  
12 authority. He added the threat of publishing, "back in the late 70's I was matched up  
13 with your mom for an 8MM xxx skin flick but I told the producer Ted Paramore  
14 "no way, she was too ugly for me". I write about it in my book but I may post a  
15 teaser about it with all the supporting facts and documentation very soon." This  
16 was doubly alarming to Plaintiff, regarding harm to her family and for Meador,  
17 who unwantingly was recorded and these recordings leveraged by Defendant  
18 Barresi.  
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23 103. Sent consecutively on January 9, 2024 at 4:11 PM and 4:15 PM, emails  
24 from Defendant Barresi to Plaintiff contain disturbing elements causing Plaintiff  
25 significant distress. The messages include sexually explicit, degrading language  
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1 about Taft and her mother, paired with titles referencing killing for Depp, one as a  
2 role and the other with no explicit identity and as a 'man.' Particularly concerning  
3 is Defendant Barresi's presentation of this vulgar content as "excerpts from my  
4 book," implying a threat to publicly publish these humiliating sexual claims about  
5 Taft's mother in a commercial product. This combination of violent language,  
6 explicit sexual degradation, and the threatened public exposure of intimate,  
7 humiliating claims about a family member creates a pattern of messaging that  
8 could reasonably make the recipient feel targeted and unsafe.

12 104. On January 11<sup>th</sup> at 7am, Defendant Barresi emailed Plaintiff with  
13 threats of the recordings of Plaintiff and Meador with false authority and contents  
14 of unconsented recordings. "[Lawyer] Marty Singer listened to the recordings of  
15 you," again a statement from his unconsented recording of Waldman, that she  
16 should keep emailing him, "The WORLD is laughing at you," and forced Plaintiff  
17 to review his posting on PaulBarresi1 on January 10<sup>th</sup> of a photo titled "TAFT  
18 ROOF" and "keep em cumming." The photo of the posting by PaulBarresi1 said,  
19 "Now she says she lives in constant fear for her life." This was very distressing and  
20 threatening to Plaintiff. Defendant Barresi then contacted Meador with "FYI" and  
21 cut off a thread of emails between him and Plaintiff, leaving it to start on "On Tue,  
22 Jan 9, 2024, That recording of you coercing Angela Gayle was shortened because  
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1 in so many places you are so stupid you couldn't even cogently speak a complete  
2 sentence. Make no mistake the full recording is intact and in evidence, you fucking  
3 dolt,” with Plaintiff replying in a separate paragraph, “You misrepresented to  
4 Angela to make her afraid. Other witnesses already stated Angela was scared of  
5 you for years because you are a fraud, a psychopath...” On January 11<sup>th</sup> at 3:03pm,  
6 an email unfamiliar to Plaintiff since she had emailed with Meador’s official music  
7 email and the way it depicted the circumstances, copying PaulBarresi@aol.com,  
8 from Angela, involving “You took something very traumatic,” “You are the one  
9 that put this information in messages through email, text, and illegally recorded  
10 phone calls that you took without my knowledge or permission,” that mentioned  
11 ‘professional,’ ‘legitimately’ charge, the damage to her life is ‘immeasurable,’ and  
12 that she had to pay and that she ‘paid dearly,’ further ‘she stuck up for Johnny.’  
13 (January 10<sup>th</sup>, 2024, Angela Gayle Official’s music site is still down and hiding).  
14 The contents of the email, involving wrongful impugment of Meador, pained  
15 Plaintiff as this was wrongfully inflicted onto Meador, with the identity of who it’s  
16 inflicted by being changed. Plaintiff was being traumatized by the helplessness  
17 caused by Defendant Barresi of Meador, seeing who she cares about suffer, and  
18 experienced PTSD. The illegal recording issue made Plaintiff think she would have  
19 to be falsely arrested for the unconsented recording to stop the harm to Meador.  
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1           105. Ten minutes later at 3:13pm, Defendant Barresi made it very clear to  
2 Plaintiff that he was making Meador write this to her and it was on his behalf,  
3  
4 “You got the message you little nasty wretch. You are going to be locked up in  
5 prison, mental hospital or both.” Approximately twenty minutes later at 3:37pm,  
6 Defendant Barresi wrote with false authority to both Meador and Plaintiff copied,  
7  
8 “Dear Angela, Marty is astounded Taft was not criminally prosecuted... He is in  
9 agreement with most everyone following the trial, she needs to be locked up... She  
10 harbors guilt for abandoning her mother to burn alive. What a horrible thing to  
11 have to live with. Sincerely, Paul B.” This inflicted pain and trauma onto Plaintiff  
12 that she was leaving Meador to suffer and die, since she refused Defendant  
13 Barresi’s authority and his demands. Plaintiff submitted more citizen reports to  
14 Honolulu police against Defendant Barresi 12th (26629), 13th (26675), 16th (24-  
15 019503), 19th (24-023924).  
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19           106. Defendant Barresi contacted personnel of Plaintiff’s to silence her, to  
20 retaliate, and increase costs with no relief. On January 23, Plaintiff received an  
21 email from Mr. Brooks which further was linked to demands for funds and silence  
22 of Plaintiff: *Re: Offer from BARRESI 01/23/2024: "I have been told by BARRESI*  
23 *that he has a proposal..."*  
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1           107. Between January 26-29, 2024, Barresi's harassment continued despite  
2 clear boundaries. On or around January 26, Taft emails Barresi with Meador  
3 copied: Taft sent messages demanding Barresi "REMOVE THE AUDIOS OFF  
4 THE INTERNET IMMEDIATELY AND CEASE EDITING THEM FOR  
5 FABRICATIONS AND COERCION" and stated "WE ARE NOT TO BE USED  
6 FOR YOUR COMMERCIAL GAINS." These statements clearly indicate Taft's  
7 position that Barresi was using recordings without permission and manipulating  
8 them.  
9

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12           108. The day after Plaintiff tried to support Meador and her against  
13 Defendant Barresi, on January 27<sup>th</sup>, Meador re-surfaced onto her AngelaGayle01  
14 modeling and music social media profile briefly. It appears it's immediately after  
15 Plaintiff tried to stop the exploitation of them. However, Plaintiff was unable to  
16 stop Defendant Barresi exploiting their unconsented phone recording and his  
17 stalking of them. Plaintiff struggled to find any solution, while submitting citizen  
18 reports with documentation to Honolulu police throughout the month. This  
19 included many timeline incidents, and the transcription of Plaintiff and Meadors's  
20 original call within context of exploitation of its recording by Defendant Barresi.  
21

22           109. On January 29, 2024, Barresi sent particularly disturbing messages  
23 stating, "Your life should be a living nightmare" and making threatening references  
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1 to Taft's mother. In another email the same day, he threatened to "POST VIDEOS  
2 EVERYDAY FROM NOW UNTIL HELL FREEZES OVER," demonstrating his  
3 intent to continue the harassment campaign indefinitely. These communications,  
4 spanning from January 9-29, 2024, reveal a consistent pattern of unsolicited,  
5 threatening messages containing abusive language, clear threats of harm or  
6 consequences, public defamation, apparent manipulation of recordings without  
7 consent, and the strategic invocation of third parties to coerce compliance—all  
8 causing Taft sufficient distress to change her contact information and report the  
9 situation to law enforcement.  
10  
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12

13  
14 110. On January 26th, 2024 Taft reported to the FBI online tips that Barresi  
15 blackmailed her, and Defendant Barresi claimed “he was accused by” Plaintiff of  
16 “killing a woman by throwing her off a roof,” “now she says she’s in constant fear  
17 for her life,” and he stated she was on the “8th floor.” “Barresi contacted people  
18 around victim.” Plaintiff Taft included in her report that he “blackmails witnesses,  
19 victims for actors,” that witnessed crimes involving “(abuse, violence, financial  
20 issues),” and “tells people he is like a hitman” while “Barresi is on audio recording  
21 claiming she had 10 million dollars and to supply him tapes or he would  
22 implicate.” Taft told Defendant Barresi she submitted a report to the FBI with no  
23 details, due to sensing him wanting to harm innocent parties in this report. While  
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1 later picking up her citizen reports from the Honolulu police records department,  
2 Plaintiff physically shook when explaining the unconsented recordings and  
3 withholding or forcing of statements from the actions by Defendant Barresi.  
4

5 111. Between January and May 2024, Plaintiff Taft filed multiple reports  
6 with the FBI detailing blackmail, extortion, and coercive threats by Barresi, and to  
7 a lesser extent, Adam Waldman. These included weaponization of an unconsented  
8 recording of a phone call between Taft and assault victim Angela Meador, which  
9 Barresi repeatedly exploited to psychologically intimidate and isolate Taft. FBI  
10 Special Agent Greg Turner in interview acknowledged the severity of the situation,  
11 indicating victim services may follow up, while Plaintiff also reported to Honolulu  
12 police. Despite a cease and desist letter from her attorney, Barresi escalated his  
13 threats—copying Meador in coercive emails, issuing vulgar threats about  
14 Plaintiff's deceased mother, and suggesting Plaintiff deserved to die.  
15

16 112. On February 18<sup>th</sup>, Defendant Barresi demonstrated to Plaintiff by  
17 responding to the thread with “poor Angela Gayle” that he was not offering to stop  
18 using Plaintiff and Meador's unconsented recording, by shifting only to Plaintiff's  
19 mother in videos he allegedly removed and to contact this temporary lawyer of  
20 Plaintiffs to “discuss removing all of them.” On February 23, Defendant Barresi  
21 proceeded to force Meador further to copy Plaintiff onto the email to her, that he  
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1 sent a lawyer letter to Plaintiff, and that his lawyer would be contacting her about  
2 Meador's records of dates when Plaintiff sent texts to her about "rainbows, her PI,  
3 and things that are 'so sad'." Defendant Barresi attached text files of Plaintiff and  
4 Meador's text messages, including positive. This significantly distressed Plaintiff.  
5

6  
7 113. In early 2024, Barresi continued his campaign with emails threatening  
8 Plaintiff's life and using wrongful demise to Angela Meador as leverage to silence  
9 her, falsely claiming legal authority and referencing Waldman. On multiple  
10 occasions, Barresi sent hostile messages and released manipulated audio tapes to  
11 third parties and the public, including defamatory content about Plaintiff and her  
12 family.  
13  
14

15 114. Through January to March, Plaintiff struggled against the abuse from  
16 both ends without relief. By March 2024, Plaintiff struggled to attend an event  
17 supporting victims and survivors in the Arts through Alexa Nikolas, and was  
18 hypersensitive to stimuli from the blinding abuse by Defendant Barresi. Plaintiff  
19 continued to text Heard's friend Brandon McCulloch, this time her location in  
20 Burbank to check if Defendant Barresi would be released on her, who read without  
21 reply for years. Approximately May 2024, again Plaintiff met with Aedan, and  
22 trying to recover from Defendants, he positions that she can work for him for a few  
23 months for 100,000 pieces of stock, valued at the time to be \$250,000, however,  
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1 Defendant Barresi's illicit barrage continued with lives damaged and no assistance  
2 to Plaintiff. By mid-2024, Taft was forced to transfer assets overseas and flee due  
3 to credible fears for her safety and for relief culturally, compounded by  
4 surveillance and stalking.  
5

6  
7 115. On July 9th, 2024, Defendant Barresi issued a press release in the Daily  
8 Mail promoting his book published July 5th, which explicitly mentioned Plaintiff  
9 and mischaracterized her associates as emotionally vulnerable 'conspirators.'  
10  
11 Plaintiff discovered the Daily Mail article, written by Chief Reporter Martin  
12 Robinson that referenced both her and Meador in connection with Defendant  
13 Barresi's book. This unauthorized release solidified Plaintiff's fears and escalated  
14 her emotional trauma. The next day, on July 10, 2024, Defendant confirmed to a  
15 third party that he was actively contacting Meador. This suggested their  
16  
17 unconsented recorded phone conversation would continue to be disseminated and  
18  
19 could be published in the Daily Mail or American Media Inc or other media outlets  
20  
21 connected to Defendant Barresi without consent. This created significant distress  
22 for the Plaintiff, who experienced physical symptoms of anxiety including a  
23  
24 constricted feeling in her throat, and considered relocating to France to escape the  
25  
26 situation. These incidents demonstrate Plaintiff's reasonable fear that both she and  
27

1 her associate would be negatively portrayed in mainstream media, with their  
2 private communications potentially being published without authorization.  
3

4 116. Defendant Barresi operates self-promotional websites at [https://paul-  
6 barresi.com](https://paul-<br/>5 barresi.com) and <https://paul-barresi.com/articles>. By approximately July 2024,  
7 Defendant had modified his websites to focus entirely on promotion and sales  
8 activities in connection with media coverage. These sites display articles from  
9 various publications, including American Media Inc, RadarOnline, Daily Mail,  
10 New York Daily News, New York Post, News 24, and Page 6. Defendant Barresi  
11 also operates promotional YouTube channels that contain recordings of Plaintiff  
12 and Meador and advertise his book for sale. Both the websites and YouTube  
13 channels promote Defendant's book, *Johnny Depp's Accidental Fixer*, which  
14 became available for sale in July 2024.  
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18 117. In July and August 2024, Barresi sent threats stating Plaintiff would  
19 "burn like her mother," referencing cremation remains, and used defamatory  
20 imagery to humiliate her. Defendant Barresi's lying obscured his activities.  
21

22 118. On July 30, 2024, Defendant Barresi, in retaliation for Plaintiff  
23 speaking with reporters against falsified interview statements in his book and  
24 media positioning, exploits the unconsented recording of the phone call of Plaintiff  
25 and Meador with 6 unconsented recordings. Extremely hostile and threatening  
26  
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1 email containing vulgar language, false allegations about her family, and multiple  
2 links to YouTube videos with unconsented recordings. Defendant Barresi  
3 repeatedly falsely claims Taft "instills fear in vulnerable woman in deceitful  
4 attempt," referencing the recording of the conversation between Taft and Meador  
5 described as showing her in a "vulnerable" state. The email titled "Your Brother is  
6 a Monster" against Plaintiff's half brother, suggests Barresi is using these  
7 recordings as leverage or blackmail to maintain a book he's selling and media  
8 positioning, retaliating against Taft for speaking with journalist Andréa Oldereide  
9 from BoredPanda about falsified interviews of witnesses, victims, and content—  
10 creating a pattern of harassment that could reasonably cause fear for personal  
11 safety and potentially violate laws. This harassment reconnects to previous threats  
12 of vandalism, break-ins, and intimidation against "Johnny witnesses," including  
13 through the use of an unconsented Waldman recording.

14  
15 119. On August 5, Defendant Barresi sent an email stating, "you are  
16 finished" and "the gloves are off," in retaliation for her speaking with a journalist at  
17 Bored Panda about his falsified book. On August 16, 2024, Defendant Barresi  
18 derangingly emailed, "Your PI made up the private plane scenario to take you for  
19 everything you got. \$\$\$ just like that other mother fucker" that financial issues  
20 combined with emotional issues, "will be the death of you just as it was for your  
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1 mother. Burning in hell is a place you belong.” On August 19, 2024, Defendant  
2 Paul Barresi sent a hostile email referencing suffering and final moments. The  
3 email's subject line "mommy, mommy, im sorry mommy, im sorry....." and "before  
4 she struggled to take her last breath” adds to the emotional impact. This was  
5 further traumatizing for Plaintiff. Plaintiff, knowing suffering still was occurring as  
6 well to people she cared about from Defendant Barresi, continued to disrupt her  
7 career, at great cost to her, her education, and she withheld from attending the  
8 University of Monaco, although she provided transcripts for acceptance, as she had  
9 withdrawn from American University’s MBA program citing harassment and  
10 publicity-related issues in October 2022, and Aedan had removed Plaintiff from its  
11 board during that time. Plaintiff felt the helplessness of people she cared about.

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13 120. Between September 2024 to December 2024, Defendant Barresi  
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insanely contacted individuals essential for Plaintiff to communicate with to clear  
the psychological chaos, coordinated disparagement, and illicit activities created by  
him. Defendant Barresi left a strange voicemail to McCormick. Barresi further in  
delusion-creating used a photo of a wife of a politician celebrity in attempt to make  
Plaintiff’s process server believe his delusion of grandeur. Defendant Barresi  
disturbed witnesses, victims, associates of Plaintiff, namely Nitrini, Sarabia,  
Beaton, and Meador. Defendant Barresi further rampaged derangingly and

1 nonsensically compared to reality, explicitly naming Plaintiff approximately over  
2 50 times and he privately sent his derangement to associates of Plaintiff's.  
3

4 121. Defendant Barresi further unwantingly contacted Molly Beaton in  
5 October 2024, and showed Plaintiff on November 11<sup>th</sup> on her mother's birthday  
6 that Defendant Barresi was impugning Meador about a depicted letter from years  
7 before which contained wrongful retaliation. With Plaintiff's encouragement,  
8 Beaton was extracting herself from the situation causing Meador severe emotional  
9 distress, the phrase "The alleged victim or aka Jane Doe is really a non entity,"  
10 disturbs Plaintiff in context that Meador has PTSD and Plaintiff did not want any  
11 harm to Meador. Further, Albertini with his money laundering background added  
12 Defendant Barresi's name, as both Plaintiff and Meador understood. Plaintiff  
13 seeing continued harm to Meador by Defendant Barresi with disputes, taking away  
14 autonomy, caused Plaintiff depression and to worry for Meador.  
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19 121. On November 24, 2024, Plaintiff refuted that Defendant Barresi  
20 violated California's "Stand Against Non-Disclosure Agreements Act" (SB 331)  
21 that individuals cannot be silenced about misconduct, crimes, or harassment, which  
22 would also protect Meador. On December 3, 2024, Defendant Barresi openly  
23 acknowledged using his harm to Plaintiff and her associates, in this case, as a  
24 marketing tool to increase sales of his book. On December 19, 2024, Barresi  
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1 continued his pattern of hostility calling people “cowards”, who are connected to  
2 the Plaintiff.  
3

4 122. On December 31<sup>st</sup>, 2024, Defendant Barresi again repeated  
5 unauthorized disclosure of the unconsented recording of the phone call between  
6 Plaintiff and Meador, on his YouTube advertising channel, forcing statements that  
7 no longer applied and not wanted in their lived realities, replaying allegations of a  
8 gun to Meador’s head and witness intimidation, and was a moment in time that  
9 Defendant Barresi refused to let them free of. This retaliation was unwanted, and  
10 again forced statements, taking away autonomy and wellbeing. This harm again  
11 repeated to Plaintiff and Meador was emotionally draining, creating distress, and  
12 wanting escape from Defendant Barresi.  
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16 123. In the months of 2025, Defendant Barresi approximately explicitly used  
17 Plaintiff’s name over 70 times, with multiple other times into the hundreds without  
18 explicit use of her name, and many other times impugning her associates,  
19 vulnerability, witnesses, family, and tracking her locational residencies.  
20  
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22 124. On January 1, 2025, Barresi posted Plaintiff of abandoning her  
23 vulnerable mom during a wildfire, claiming she left her mother to die and later  
24 received financial relief. His graphic description detailing "her teeth, charged (sic)  
25 bones & a near intact heart" forced the Plaintiff to look at the coroner report of her  
26  
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1 mother against her will. The same day, January 1, 2025, Barresi posted images of  
2 flight paths between Taft's undisclosed address in Antibes, France and Madrid,  
3 Spain, alongside a photo of Taft with Heard. He added that "Christina Taft has  
4 allegedly already begun to upset people in France, I am informed," attempting to  
5 make Taft fearful that others were monitoring her relationships. On January 2,  
6 2025, Defendant Barresi had mortality ideation about "ever breathed air" and  
7 intensified his monitoring of her communications with witnesses. From January 4-  
8 12, 2025, he continued a harassment campaign that included taunting Taft with  
9 crude narratives about her mother's death, posting her mother's coroner report with  
10 Taft's childhood photos, sharing flight tracking information to locate her address in  
11 France, and making false claims about her mother suing Warren Beatty. On  
12 January 7, 2025, he posted disturbing details about her mother's death, claiming  
13 "nothing left but a few charged bones and most of her heart." Throughout this  
14 period, Barresi also repeatedly posted photos of Taft with witness Heard, calling  
15 them both "brain dead" and "wrenches" on January 4, 2025, demonstrating an  
16 erratic pattern of Defendant Barresi's derangement.  
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23 125. On January 4<sup>th</sup>, Plaintiff received influenced interviews and an  
24  
25 unconsented recording by Defendant Barresi of Charles and Constance, family  
26 members of Anthony Fox's in response to her witness subpoena to Nitrini. This  
27

1 revealed numerous links to publications, RadarOnline that Defendant Barresi sold  
2 stories, and PressReader and Enstarz, and in disregard to evidentiary needs of the  
3 Missing Person Investigation for Anthony Fox (VPD 01-18806).

5 126. In mid-January, Defendant Barresi again sent directions to personnel to  
6 restrict Plaintiff and used false authority to force on Plaintiff. January 12, 2025  
7 6:28am PaulBarresi1: "I have it from good authority that Amber Heard security is  
8 under high alert out of fear... of Christina Taft, CEO of Rescue Social." / X. and  
9 again on January 12<sup>th</sup>, "needs to step up her security" coinciding with mortality  
10 ideation "Christina Taft, CEO of Rescue Social" and "has ever breathed air."  
11 Plaintiff did believe Defendant Barresi's authority, mainly due to his repeated  
12 access to these associates, and the lack of communications to relieve her and his  
13 collections of information to impugn. When Plaintiff refused to do Defendant  
14 Barresi's demands entirely, on January 17<sup>th</sup>, he then turned back to his delusion-  
15 creating by showing a photo of himself at a dinner with mafia families in New  
16 York from years ago. Plaintiff faced threats and retaliation from Defendant Barresi  
17 if Plaintiff associated with Heard and Meador, as both were valuable. Secondly,  
18 Plaintiff continued to have interference in her businesses for safety with fear of  
19 going to Spain, as she had avoided the location for years due to Barresi's  
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1 monitoring and retaliatory threats. Two business partners and affiliates, Niko  
2 Sanchez of SaveMeNow, and Eleanor Manley, reside in Spain.  
3

4 127. On January 22, 2025, Temporary Restraining Order issued in Hawaii to  
5 Plaintiff against Defendant Paul Barresi (Case No. 3DSS-25-0000044). The order  
6 was granted based on Defendant's ongoing pattern targeting Plaintiff and others  
7 associated with this case. This behavior includes coercion, invasions of privacy,  
8 and acts of harassment designed to instill fear and obstruct justice. The TRO  
9  
10 reflects the seriousness of the ongoing harm caused by Defendant Barresi and the  
11 urgent need for protection. Plaintiff did 28 subpoenas to witnesses in this case as it  
12 was extended to April 16, 2025, and process servers successfully served some.  
13  
14

15 128. On February 3, 2025 and March 10, 2025, Defendant Barresi again  
16 used false authority that he directed the "security staff" of Heard's to be on "high  
17 alert," to stop Plaintiff from communicating with, properly serving her, and  
18 contributing to positive publicity of her. On February 3<sup>rd</sup>, Defendant Barresi again  
19 uses the unconsented recording of Plaintiff's father altering its meaning. On  
20 February 21<sup>st</sup>, Defendant Barresi obtained a private photo of Plaintiff, with a  
21 Mozart ring, presumably from Motteler on a 3 year restraining order (1DSS-24-  
22 0001379), while tracking Plaintiff's activities in Europe. On February 28<sup>th</sup>,  
23 Defendant Barresi showed mortality ideation for Plaintiff, with publishing an  
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1 altered sickly photo of her, to associates she cares about with invasions to impugn,  
2 “When that bitch finds out what we've uncovered about her she'll look like Juliet at  
3 the awakening in the tomb.” On March 6<sup>th</sup>, Defendant Barresi deemed subpoenaing  
4 Heard wrongful. On March 10<sup>th</sup>, Defendant again tracks Plaintiff’s home in  
5 Antibes, France. Defendant Barresi further published a photo detailing Plaintiff’s  
6 attempts to support Heard that he deemed wrongful, e.g., Contributing financially  
7 to Heard's appeal through an amicus brief, contributing and supporting women's  
8 rights causes connected to Heard, seeking publicity, attempting to communicate  
9 with Heard at events, and subpoenaing her. Barresi's communications sever these  
10 forms of association by directing security intervention to occur if Taft continued  
11 her support. The content in the photo also suggests monitoring. Defendant Barresi  
12 has detailed Taft's activities, suggesting surveillance, is aware of her financial  
13 contributions to Heard's efforts, knows about her residence purchase in Europe, has  
14 tracked her attendance at events where Heard would be present, has monitored her  
15 communications with Heard's lawyers of her support and help. The detailed nature  
16 suggests an obsessive tracking of Taft's activities that goes beyond normal  
17 awareness, potentially indicating a concerning fixation that could reasonably cause  
18 fear of harm. Plaintiff is afraid of violence and retaliation, and Defendant Barresi’s  
19 directions significantly restricted her support, freedoms and autonomy.  
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1 129. Plaintiff's ongoing reports to the FBI and her attempts to protect  
2 witnesses like Meador were met with continued harassment and retaliatory  
3 manipulation. On March 12, 2025, Meador's coerced declaration—obtained under  
4 duress—was filed. Defendant's manipulation extended to mischaracterizing  
5 Plaintiff's identity and coercing Meador to recant details about abuse. Plaintiff  
6 knew the mischaracterizations of her words to her were from others statements, as  
7 Plaintiff checked on Meador and tried to separate her from Albertini and others.  
8 Further, Plaintiff was not involved with Herndon or Beaton until later. It distressed  
9 Plaintiff that Meador is being forced to be held to statements she never attributed  
10 in order to enforce Plaintiff's demise and Defendant Barresi to wrongfully force  
11 Plaintiff into a nondisclosure agreement to benefit Defendant Barresi against best  
12 interests. Further, it traumatized Plaintiff that Meador recanted the identity of who  
13 assaulted her to Mr. X. All of which would not help either women long-term.

19 130. On March 21, 2025, private investigator Heather Cohen interviewed  
20 Meador, who confirmed she had not consented to the recording, the use of it, or the  
21 sharing of it to Defendant Barresi, appeared visibly afraid and shaken, and  
22 questioned if Cohen was working for "Mr. X" or Defendant and stated "you have  
23 no idea what you're getting yourself in the middle of," indicating severe emotional  
24 trauma. She held her hands by her mouth. Cohen assured Meador that she did not  
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1 work for the individuals Meador mentioned and she wasn't in danger from her.  
2 Meador told Cohen that her client could contact her directly. Later, Cohen saw her  
3 phone's recording was screechy static, suggesting interception, which Plaintiff  
4 understood could mean Meador was under surveillance, making her suspect the  
5 historically documented surveillance by Marton Csokas. This caused Plaintiff to  
6 have continued panic for Meador's free speech, wellbeing, life, and autonomy.  
7

8  
9 131. Similarly, in March-April 2025, Barresi used false authority to  
10 threaten Angela Meador for Plaintiff's attempts at communication with her. On  
11 March 26, investigator Heather Cohen filed a declaration affirming Angela's non-  
12 consent to the recording, the use of it, or the sharing of it and her visible distress  
13 from Mr. X and Defendant Barresi. Plaintiff was worried for Meador. On March  
14 26, James Conner, another witness and family of Plaintiff, signed a declaration that  
15 Barresi recorded and published his call without consent, manipulated the content,  
16 and harassed him and his family across state lines. Conner wanted the harm to his  
17 family, daughters, son and him to stop from Defendant Barresi.  
18

19 132. Private investigator Renee Brewer emailed Plaintiff on March 28, after  
20 Defendant Barresi's intervention, that Meador "told me she was scared to death"  
21 and "was shaking uncontrollably." This email demonstrates the psychological  
22 trauma Meador continues to experience, consistent with her documented history of  
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1 being threatened after her assault by Csokas, and the same wording that Defendant  
2 Barresi dictated to Plaintiff that Heard experienced. Meador further, as she did in  
3 October 2022, after an extortion attempt and ticking timer that Plaintiff  
4 experienced, expressed concern for Plaintiff's financial wellbeing for a refund.  
5 Plaintiff wanted to comfort her, and experienced intense sadness, crying,  
6 depression, and worry.  
7

8  
9 133. The testimonies from Cohen, Meador, and Conner confirm a consistent  
10 pattern of intimidation and unconsented audio exploitation central to Plaintiff's  
11 claims of ongoing witness tampering, coercion, and psychological abuse.  
12

13  
14 134. After the subpoena to a witness Meador issued March 28<sup>th</sup> in Hawaii by  
15 the clerk, Plaintiff asked two process servers their availability and to call for  
16 appointments with Meador, to let her know before arriving. Marcus Watson of  
17 Gold Coast Legal expressed she's out of town. On March 31<sup>st</sup>, a process server,  
18 Tracy Kroft of TracerX Legal, for a subpoena saw Meador had police witness  
19 protection and discovered that she had been sleeping in the afternoon,  
20 demonstrating her visible distress. Officer Bourk expressed returning when she's  
21 awake for serving the subpoena. Plaintiff worried for her. Kroft attempted to serve  
22 again that evening and gratefully Meador was awake. Plaintiff left voicemails and  
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1 texts to Bourk supporting Meador against coercion, and to Lieutenant Matthews.  
2 Plaintiff continued to express urgency for Meador's wellbeing, free speech and life.  
3

4 135. Throughout March 31<sup>st</sup> especially for a week and to April 14<sup>th</sup>, Plaintiff  
5 encouraged the police to protect Meador, by reporting to the Lieutenant, and  
6 correctly identified that she was assaulted by Marton Csokas and Meador  
7 experienced retaliation from him, as well as experienced coercion from Defendant  
8 Barresi involving traumatizing imagery of a gun to the head from an unidentified  
9 assailant, and about their unconsented recording of their phone call initiating the  
10 coercion by Defendant. Plaintiff experienced horrific hyperarousal  
11 freeze/flight/fight and trauma from worrying for Meador, knowing she's in genuine  
12 fear for her life from people who could harm her after the assault by Csokas, and  
13 through Defendant Barresi's impugntment and force. Genuine friends of Plaintiff's  
14 encouraged Plaintiff to be supportive and kind to Meador. Plaintiff provided  
15 supportive, kind, apologetic, police protection supporting messages, to Meador.  
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21 136. In April 2025, multiple witness declarations and service efforts  
22 confirmed both the harm inflicted on Angela Meador by Barresi and Plaintiff Taft's  
23 ongoing efforts to protect her. On April 1, private investigator Alejandro  
24 Hernandez submitted a declaration under 28 U.S.C. § 1746, confirming that  
25 Patricia Strader, sister of James Conner, remembered Plaintiff but declined  
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1 involvement due to fears related to Barresi. On April 10th, Meador called back  
2 process server Philip Hamilton after messaging support for her music career and  
3 being featured positively. Separately, on April 8 and 12, Plaintiff contacted  
4 industry professionals expressing admiration for Angela's music career and  
5 concern over its apparent decline. Plaintiff expressed enthusiasm to Warner Music  
6 Group/University Records for Meador's music singles "Have You Told Her" and  
7 "Love Yourself," among performances as an artist, "Be positive; work hard; always  
8 be kind; and help whenever and wherever you can" quoted from Meador. Plaintiff's  
9 efforts to support Meador's recovery included outreach to music collaborators,  
10 including Global Media Management. These attempts were made to restore  
11 Meador's independence and affirm her artistic identity. Meador, a rising music  
12 artist with performances at the Grand Ole Opry and representation by major labels,  
13 had her career severely derailed by the distress caused by Defendant's actions.  
14 Music producer Leland Grant confirmed to Plaintiff he had not seen Angela in  
15 three years, suggesting her career had suffered since the start of unlawful  
16 dissemination of her unconsented phone recording by Defendant.

17  
18 137. Plaintiff continued to support Angela's work, coordinating with music  
19 professionals and for her inclusion in positive media features, while subpoenas  
20 were issued and served to key witnesses. These included Rebecca Berry (March 12  
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1 and April 17), Angela Meador (March 28 and April 15), and Ian Herndon (April  
2 14), with service confirmed police protection and needs for assistance.  
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4 138. Approximately April 1<sup>st</sup>, Plaintiff retrieved an order from the last  
5 documents by Anthony Fox before his disappearance in his lawsuit against the  
6 Viper Room, that a company, Trouser Trumpet Inc. was allegedly involved in  
7 paying security staff and a forged exhibit 77. However, Plaintiff, due to Defendant  
8 Barresi's continued activities against her, associates, family, and loved ones, has  
9 not reported to the Ventura police the findings about Paul Schindler – including the  
10 recording of Big Ed Shaw and Albertini - that Schindler was responsible for hiring  
11 Shaw in security at the Viper Room – and high probability that there is a resolution  
12 for Fox's cold case through re-interviewing through that related inquiry.  
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16 139. For weeks, Plaintiff helped Meador with the police by submitting  
17 documentation to them and encouraging them to help Meador, that Meador was  
18 genuinely afraid and needed protection, and Cohen approximately April 17<sup>th</sup> was  
19 interviewed for an hour. Plaintiff was urgent to help Meador's life, wellbeing, and  
20 speech through people that could provide evidence for her autonomy long-term.  
21 The supportive letters trying to heal abuse with the subpoena, and her being able to  
22 report to police safely, approximately April 22<sup>nd</sup> gave a strong energy of saving  
23 Meador's life. Meador never added the name of Defendant Barresi to the letter that  
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1 the group circulated in 2020 to present. Meador is a former law student and life  
2 guard supervisor who has a clean background. Plaintiff and Meador have been  
3 stalked by Defendant Barresi for years with needing phone records. Despite these  
4 challenges, Plaintiff has continued to advocate for Meador's safety and justice.  
5

6  
7 140. Defendant Barresi was privately in communications directing and  
8 making Meador afraid of retaliation at night and wrongfully from armed personnel,  
9 the same repeating threats he published publicly, emailed, and texted to threaten  
10 Plaintiff about Heard's security guards and personnel falsely. This vulnerability  
11 for Meador is enhanced by Defendant pressing on her fears of retaliation shown in  
12 materials he collected on her and Plaintiff. For Plaintiff, this is horrifically  
13 traumatizing and worrying her for Meador's wellbeing, and to mischaracterize her  
14 rescue services and public safety work as harmful, when she needs assistance. It  
15 has been highly damaging to her work with SaveMeNow, which she discovered  
16 approximately March 5-10th that a similar application by a different company was  
17 released in the south of France with 5,000 downloads as "SaveMe." Secondly,  
18 Plaintiff's work as a process server has been psychologically damaged, whereas in  
19 December 2024, Plaintiff spent the holiday with a public figure client of her work  
20 partner, process server Mark Ackrich in Hawaii, and his client's family.  
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1 141. Approximately April 28<sup>th</sup>, Defendant Barresi weaponized more  
2 financial exploitation and vulnerability through coordination, as he had for months,  
3 a sideshow with Tamara Motteler, a 3 year restrained person (1DSS-24-0001379)  
4 who formally was in Plaintiff's condo and had sexually harassed her through trying  
5 to make her be with older men, abused her, and who had harassed her younger  
6 friends from Germany. Using photos from Motteler, Defendant Barresi harassed  
7 Plaintiff, her friends namely Isabelle, and ex boyfriend Adrien from France, falsely  
8 claiming 'rough sex.' Process servers had been sent over 20 times by Motteler and  
9 lawyers enabling Motteler for free trying to force thousands of dollars from  
10 Plaintiff. Defendant Barresi repeatedly creates fear of living in one location.  
11 Plaintiff, being protective of her friends, was incensed by this abuse.

12 142. Private investigator Alejandro Hernandez's corroborating declaration  
13 and a prior subpoena of James Conner supported this. By May 1, 2025, all  
14 documentation—including transcribed and notarized declarations—was submitted  
15 alongside Plaintiff's formal Objection and Preliminary Injunction Request to  
16 prevent further exploitation and retaliation while supporting Angela Meador.

17 143. On May 2<sup>nd</sup>, Plaintiff saw Meador's writings from April 8<sup>th</sup> connecting  
18 dates that when reviewing the content with the dates, appeared to be pleading for  
19 help for her life and her career with reviewing the messages sent supporting her.  
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1 This distressed Plaintiff for Meador's life and wellbeing, especially in relation to  
2 Meador's credible fears of retaliation from Marton Csokas and the stalking from  
3 Defendant Barresi, who has forced changing identities of true perpetrators. One  
4 connected date was to March 26<sup>th</sup>, which was to Plaintiff's text to Meador of "I'm  
5 at Lori Mattix's house, can I please call you later?" This is very saddening to  
6 Plaintiff and painful. Plaintiff days after this submission provided with a witness  
7 subpoena messages supported Meador's music career, life interests, and her  
8 background, further, that her friend's niece had donated to Howell's art charity,  
9 with "hope all is well," in efforts to comfort, revive, and encourage Meador.  
10 Moreover, a phrase that Plaintiff never states was used, that Plaintiff knew was  
11 from Albertini and documented in his voicemail about a brutal rape from a movie  
12 star, which included retaliation of releasing a video and threats before leaving the  
13 hospital which mistakenly attributed to falsely identifying Defendant Barresi,  
14 which was sent in Plaintiff's objection. Reading Meador's fears, orchestrated by  
15 Barresi, of wrongful consequences for her statements and about her niece, who  
16 Plaintiff didn't know existed, was heartbreaking and depressing. Plaintiff continued  
17 to experience horrific trauma symptoms. Plaintiff gently uses civil debate and  
18 rejects force, abuse, violence, assaults, corporal punishment, and retaliation.  
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1 144. Defendant Barresi's directions to Meador and leveraging of recordings  
2 of her and Plaintiff, stopped Plaintiff's ability to communicate positively with  
3 Meador and stopped proper process serving, obstructing the rights to bring forward  
4 complaints against Defendant Barresi, for proper preparation for this lawsuit, and  
5 to free Plaintiff and Meador from him and Csokas. Barresi enforced filings and  
6 summons against Plaintiff on April 8<sup>th</sup>, April 10<sup>th</sup>, and April 15<sup>th</sup> where Meador  
7 linked dates to evidence, that upon reviewing the content, showed she needed  
8 positive help and an accurate investigation from authorities to protect her. Plaintiff  
9 continued to protect Meador, and the maneuvering was atrocious. Plaintiff knew  
10 she had advised Meador years ago to change the identity of the source of the harm,  
11 and believed she was afraid of blackmailing and force from Barresi. It felt like a  
12 horrific hostage situation, of a woman calling for help. Plaintiff was silenced.  
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18 145. Meador was directed by Defendant Barresi falsely that Plaintiff would  
19 retaliate against her, and to fear security guards, as Defendant Barresi had told  
20 Plaintiff that Heard falsely would do to her, in November 2022, January 2024, and  
21 March-April 2025. Plaintiff, with a process server, served Heard with a subpoena  
22 through posting at her home and to her neighbor, and through mail (March 26<sup>th</sup>,  
23 April 6<sup>th</sup>, April 8<sup>th</sup>). Plaintiff sent the corrected subpoena, where she attempted to  
24 release Heard more from potential blackmailing from Barresi, with corrected  
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1 interviews and no longer emphasized injunction, and support for interviewing and  
2 her career. No security guards or other retaliation occurred at the location in Spain.  
3  
4 Plaintiff sent support, kindness, encouragement and profuse apologies to Angela  
5 Meador, however, forced through NAPPS process servers, to post and mail the  
6 subpoena to a witness in the Hawaii case only against Defendant Barresi to her  
7 while Defendant Barresi issued threats of false arrest of Plaintiff and credible  
8 demise to Meador if she didn't finally risk these consequences to herself.  
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11 146. Defendant's pattern of behavior—including disseminating coerced  
12 statements, threatening violence, and weaponizing private communications for  
13 commercial gain—has caused ongoing harm to Plaintiff. Defendant Barresi's  
14 actions violated Plaintiff's civil rights, defamed her character, disrupted her  
15 business, falsely charged her, and compromised her and Meador's safety.  
16  
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18 147. Plaintiff showed generous love to Meador and had to use process  
19 serving to help Meador at all with supportive messages and officiality. Plaintiff  
20 then publicly refused to review Defendant Barresi's profile alleging his manner to  
21 which he was coercing Meador against her interests in having no more  
22 unconsented use of private materials and restoring being able to identify Csokas.  
23  
24 Plaintiff pleads to this Court to free Meador and herself from Defendant Barresi  
25 and Defendants. Plaintiff tried to improve living freely of those she cares about  
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1 from Defendant Barresi and Defendants, nor should it matter their point of views,  
2 in terms of association – whether it's various views of opinions or classifications of  
3 witnesses for Depp, Heard, both, or anyone. Plaintiff's mother Victoria Taft had  
4 listened to others on the phone while she was told misinformation about evacuation  
5 without official notices, making this a particular vulnerability of Plaintiff that  
6 Defendant Barresi has continually leveraged against Plaintiff.  
7

8  
9 148. On May 7<sup>th</sup>, Through help from a process server in Los Angeles from  
10 NAPPS, Plaintiff obtained documentation on microfilm of her mother's lawsuit for  
11 a studio injury. Contrary to Defendant Barresi's manipulative portrayal, Victoria  
12 Taft's standard lawsuit (EC 000266) was straightforward and professional—a  
13 workplace injury case. The lawsuit's timeline focused on a footfall injury sustained  
14 while working as a stand-in, and named only workplace liability defendants (The  
15 Walt Disney Company, a Corporation; Mulholland Productions, Inc., a  
16 Corporation, Walt Disney Pictures; Warren Beatty; Barrie Osborne; Jon Landau;  
17 Richard Marks; and Does 1 through 100, inclusive) with a Plaintiff-in-Intervention  
18 for Workers' Compensation. The lawsuit's mention of interrogatories had nothing  
19 to do with deception as Barresi falsely implied, but reflected Victoria's  
20 commitment to being clean, decent, and modest in her professional conduct.  
21 Victoria was never intimidated by the studio system, Warren Beatty, nor as  
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1 Defendant Barresi wanted to create a delusion of a mafia family - many colleagues  
2 and friends still speak fondly of missing her—but rather had concerns about her  
3 ex-husband. In fact, Victoria's friend Mr. Joe Triscari had positive associations  
4 with Mr. Beatty, having seen him with his girlfriend at The Rainbow restaurant.  
5

6  
7 149. In May 2025, Plaintiff and Meador continued to be stalked by  
8 Defendant Barresi, preventing communication to help each other against the  
9 repeated unwanted actions from Defendant they've experienced for years. On May  
10 23<sup>rd</sup>, a phone company advised Plaintiff that her friend Meador should change her  
11 phone number and call them in efforts to curtail the stalking by Defendant Barresi.  
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14 150. It has been devastating for Plaintiff Taft, her friends, her associates, and  
15 her family, to be exploited and stalked by Defendant Barresi, who has deliberately  
16 created financial hardships and inflicted emotional pain through his manipulative  
17 misuse of personal tragedy and sensitive information, instilling tactics that *People*  
18 *of California v Confidential Inc, Hollywood Research et al*, discovered by  
19 Plaintiff's business Rescue Social Inc. tried to resolve. Defendants took Plaintiff's  
20 rights of association and speech, wrongfully prolonged crises and forced  
21 unconsented recordings of phone calls that Defendants abused and disclosed  
22 unlawfully, while making her move her work to help people's safety related to the  
23 Arts overseas and hidden through other regions of the United States.  
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**LEGAL SECTION**

**FIRST CLAIM FOR RELIEF**

**Violation of the Tom Bane Civil Rights Act (Cal. Civ. Code § 52.1)**

151. Plaintiff hereby re-alleges all paragraphs contained in the foregoing Complaint and incorporates the same by reference as if fully set forth herein.

152. The Tom Bane Civil Rights Act (California Civil Code § 52.1) provides civil remedies for any person whose exercise or enjoyment of constitutional or statutory rights has been interfered with, or attempted to be interfered with, by threats, intimidation, or coercion. The statute protects against violations of federal or state constitutional rights and laws, regardless of whether the violator acted under color of law.

153. Defendants violated the Tom Bane Civil Rights Act by interfering with Plaintiff's constitutional and statutory rights through threats, intimidation, and coercion. Specifically, Defendants engaged in a pattern of coercive conduct designed to deprive Plaintiff of her rights to association, free speech, public safety reporting, and equal protection under the law.

154. Plaintiff and her associates had the right to communicate freely, pursue artistic and professional careers, and speak about abuse without fear of retaliation. Defendants willfully interfered with these rights through threats, intimidation, surveillance, and psychological coercion.

1 155. Defendants exploited unconsented audio recordings of phone calls,  
2 made explicit threats to Plaintiff's safety, interfered with evidence, and interfered  
3 with her relationships and career. Defendant Barresi used social pressure,  
4 surveillance, and emotional manipulation to prevent Plaintiff from associating with  
5 others, preventing Plaintiff positively communicating to help Meador, Heard, and  
6 crime victims to live freely as well as have careers, working in public safety, and  
7 participating in legal matters—including witness support and process serving.  
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11 156 a. Defendants systematically interfered with Plaintiff's First Amendment  
12 right to freedom of association by threatening consequences when Plaintiff  
13 attempted to communicate with, contribute to living freely, or support individuals  
14 monitored by Defendant Barresi - no matter what viewpoints they have, whether  
15 Defendants perceived them as crime victims, assault victims, or witnesses of abuse  
16 or crimes, "Johnny witnesses" or "Amber witnesses" or both or neither, and for  
17 their rights of communication; Defendant Barresi forced terror and psychological  
18 control disrupting rights of association; Defendant Barresi made Angela Meador  
19 afraid of wrongful retaliation, which stopped positive communications with  
20 Plaintiff and service of a subpoena to a witness; Defendant Barresi wrongfully  
21 directed Angela Meador to be too afraid to communicate with Plaintiff through  
22 forcing her to be "scared to death" and "deathly afraid," similar to how he  
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1 wrongfully directed this for years to Amber Heard, including directing security  
2 personnel to retaliate against Plaintiff if she continued these associations of support  
3 to these two; forcing isolation between Plaintiff and Angela Meador through  
4 repeated exploitation of their unconsented recorded phone call, preventing them  
5 from maintaining their friendship and mutual support; preventing Plaintiff from  
6 providing positive support, publicity, and encouragement for the wellbeing and  
7 careers of associates being monitored by Defendant Barresi, abuse victims and  
8 witnesses, especially Heard and Meador; interfering with Plaintiff's right to  
9 contribute to humanitarian causes and support initiatives that assist victims  
10 monitored by Barresi; targeting Plaintiff's family members, friends, and  
11 professional contacts to create a chilling effect that deterred them from associating  
12 with her; obstructing Plaintiff's legitimate efforts to seek publicity and public  
13 support for abuse victims; preventing Plaintiff from attending events or appearing  
14 in locations where she could provide support to victims; and creating an  
15 atmosphere of fear that forced Plaintiff to sever professional relationships with  
16 SaveMeNow to protect these associates from Defendants' retaliation.

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157 b. These actions violated the associational rights protected under  
*NAACP v. Alabama*, 357 U.S. 449 (1958), by compelling Plaintiff to abandon

1 relationships essential to her personal and professional life through a campaign of  
2 intimidation designed to isolate her from her support network.  
3

4 158 a. Defendants violated Plaintiff's constitutional rights related to witness  
5 protection and access to justice by systematically intimidating witnesses connected  
6 to the Viper Room and other cases, involving assault victims, including through  
7 unconsented recordings and blackmail tactics that prevented witnesses from  
8 communicating or testifying about abuse despite their willingness to come  
9 forward; manipulating Angela Meador to recant statements under duress,  
10 exploiting her vulnerability as an assault victim through psychological coercion  
11 and threats of retaliation; interfering with Plaintiff's efforts to support witnesses  
12 and victims, including attempts to provide emotional support to Meador and  
13 encourage proper reporting to authorities; obstructing Plaintiff's work as a process  
14 server by creating an atmosphere of fear and intimidation that prevented proper  
15 service of legal documents; and using false authority claims and manufactured  
16 crises to discourage witnesses from cooperating with investigations.  
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22 159 b. These actions violated due process rights and interfered with the  
23 administration of justice, preventing both Plaintiff and witnesses from exercising  
24 their constitutional right to participate in legal proceedings without fear of  
25 retaliation.  
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1 160. These actions forced Plaintiff to relocate multiple times, including  
2 fleeing California for Hawaii and later France. Defendant Barresi also manipulated  
3 witnesses like Angela Meador to recant statements under duress and used fear of  
4 retaliation to obstruct Plaintiff's constitutional rights.  
5

6 161 a. Defendants violated Plaintiff's First Amendment right to free speech  
7 through threatening retaliation when Plaintiff spoke with witnesses and victims  
8 over the phone, text, and email; leveraging Plaintiff's private communications  
9 against her, including the unauthorized exploitation and disclosures of her  
10 unconsented recording of Plaintiff's phone call with Meador to silence both  
11 women; creating a climate of fear that prevented Plaintiff from communicating  
12 with victims being monitored by Defendant Barresi about positive social support,  
13 abuse, public safety issues, and witness protection; interfering with Plaintiff's  
14 professional communications and public safety advocacy work; threatening to  
15 release embarrassing or fabricated information about Plaintiff and her family if she  
16 continued to positively associate with or communicate with or speak out; and  
17 forcing Plaintiff to choose between her own safety and positively associating with  
18 or communicating with or speaking in support of abuse victims like Amber Heard  
19 and Angela Meador.  
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1 162 b. The Supreme Court has recognized that the First Amendment protects  
2 not only the right to speak but also the right to refrain from being compelled to  
3 speak. Defendants' coercive tactics violated both aspects of this protection by  
4 simultaneously silencing Plaintiff on matters of public concern while attempting to  
5 compel false statements through intimidation.  
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8 163. Defendants knowingly inflicted psychological distress by exploiting  
9 trauma, isolating victims, and misrepresenting their authority. This included  
10 altering recordings, manufacturing crises, and conditioning victims through threats  
11 and distorted information—demonstrating a pattern of undue influence that  
12 overwhelmed Plaintiff's free will.  
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15 164 a. Defendants interfered with Plaintiff's constitutional rights related to  
16 reporting criminal activity and seeking protection from law enforcement by  
17 intimidating Plaintiff when she filed reports with the California Department of  
18 Consumer Affairs, FBI, and local police departments; retaliating against Plaintiff  
19 for encouraging witnesses and victims like Angela Meador to seek protection and  
20 report crimes; using false claims of authority and pieces of information without  
21 background to undermine the accuracy of investigations and undermine protective  
22 law enforcement response; creating confusion about the identity of actual  
23 perpetrators to prevent proper investigations; threatening Plaintiff with false arrest,  
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1 false charges and retaliatory consequences for her communications and legitimate  
2 process serving of Meador and Heard, threatening for positive communications  
3 with victims of Defendant Barresi and witnesses, especially Meador, and reporting  
4 activities; preventing re-interviewing of Meador by Plaintiff or investigators to try  
5 to free Meador and Plaintiff from Defendants; and interfering with the missing  
6 person investigation of Anthony Fox by impugning Plaintiff, using unconsented  
7 recordings, preventing re-interviewing, and of new reporting to police.  
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11 165 b. The right to report crimes and seek protection from law enforcement  
12 is fundamental to public safety and the rule of law. Defendants' systematic  
13 interference with these activities violates both substantive and procedural due  
14 process rights.  
15

16 166. These acts meet the definition of coercion under the Bane Act by  
17 substantially interfering with Plaintiff's ability to exercise her constitutional rights  
18 through fear, manipulation, and abuse of power—not just physical threats but  
19 psychological domination designed to silence and control.  
20  
21

22 167 a. Defendants' coercive conduct created a pattern of undue influence that  
23 overwhelmed both Plaintiff's and Angela Meador's free will through psychological  
24 manipulation techniques designed to create dependency and fear; exploitation of  
25 Plaintiff's care for vulnerable individuals like Angela Meador as leverage against  
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1 her, while simultaneously subjecting Meador to undue influence that compromised  
2 her autonomy and decision-making capabilities; creating urgency and  
3 manufactured crises to force immediate compliance; using intimate knowledge of  
4 Plaintiff's trauma (her mother Victoria's death - caused when she did not evacuate  
5 and listened to others over the phone without official notices) against her by  
6 claiming she's "abandoning" helpless victims like Meador, causing severe PTSD  
7 symptoms and suffering; isolating Plaintiff from support systems to increase her  
8 vulnerability to coercion; and employing repetitive contact and threats to wear  
9 down Plaintiff's resistance.  
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14 168 b. This pattern of undue influence satisfies the Bane Act's definition of  
15 coercion by creating conditions where Plaintiff's ability to exercise her  
16 constitutional rights was substantially impaired through psychological domination  
17 rather than physical force.  
18

19 169 c. The constitutional rights violated include: First Amendment freedom  
20 of speech, association, and petition for redress of grievances; Fourth Amendment  
21 privacy rights and protection against unreasonable searches and seizures of private  
22 communications; Fifth Amendment due process rights and protection against  
23 compelled actions; and Fourteenth Amendment equal protection under the law and  
24 substantive due process rights.  
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1 170 d. These violations were committed through threats, intimidation, and  
2 coercion as defined under California Civil Code § 52.1, regardless of whether  
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4 Defendants acted under color of law, as the statute protects against both public and  
5 private violations of constitutional rights.

6  
7 171. As a direct and proximate result of Defendants' violation of the Bane  
8 Act, including their exertion of undue influence as a form of coercion, Plaintiff has  
9 suffered significant damages, including severe emotional distress; financial losses  
10 from relocation and heightened personnel needs; loss of business opportunities and  
11 professional relationships; substantial costs for private investigators to protect  
12 herself and witnesses; extraordinary expenditures to counter Defendant Barresi's  
13 manufacturing of false narratives and to provide protection for his victims;  
14 considerable financial outlays for engagement with non-interfered with personnel  
15 and communication intermediaries, specifically to restore freedom of choice and  
16 rational decision-making capabilities to victims whose autonomy had been  
17 compromised by Defendant Barresi's manipulative tactics; PTSD,  
18 flight/freeze/fight physiological symptoms, depression, weight loss, crying, and  
19 prolonged physical stress; Documented expenses incurred in documenting,  
20 preserving, and authenticating evidence to counteract Defendant's deliberate  
21 manipulation of investigative materials; interruption of her education and career  
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1 advancement; social and psychological recovery costs from the undue influence  
2 and coercion, including resources necessary to restore autonomous decision-  
3 making capabilities created by Defendants' manipulation;  
4

5 172. Financial damages to Plaintiff's career advancement, business  
6 operations including over ten partnerships of Worldie Ltd dissolving and a director  
7 resigning, her contract with SaveMeNow to languish, process serving, and property  
8 loss resulting from the need to pay for protective actions, from the constant  
9 pressuring and rights taken by Defendant Barresi and Defendants, as well as being  
10 forced to relocate for any relief and social harm caused by Defendant's tactics.  
11  
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13 173. Defendants' threats, intimidation, and coercion were malicious,  
14 oppressive, and in conscious disregard of Plaintiff's rights, justifying an award of  
15 punitive damages.  
16  
17

18 174. Pursuant to California Civil Code § 52.1, Plaintiff is entitled to  
19 injunctive relief, actual damages, statutory damages, attorney's fees, and costs.  
20 Plaintiff respectfully requests that this Court: a. Award compensatory damages in  
21 an amount to be determined at trial, but not less than \$2,000,000; b. Award  
22 statutory damages as provided by the Bane Act; c. Award treble damages as  
23 permitted by law; d. Issue temporary and permanent injunctive relief prohibiting  
24 Defendants from further violating Plaintiff's rights through threats, intimidation, or  
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1 coercion, including through the exertion of undue influence; e. Award punitive  
2 damages in an amount sufficient to punish Defendants and deter similar conduct; f.  
3  
4 Award reasonable attorney's fees and costs as provided by statute; and g. Grant  
5 such other and further relief as the Court deems just and proper.  
6  
7

8 **SECOND CLAIM FOR RELIEF**  
9 **Invasion of Privacy (Intrusion into Private Affairs and Conversations)**

10 175. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
11 Complaint and incorporates the same by reference.  
12

13 176. Article I, Section 1 of the California Constitution establishes privacy as  
14 an inalienable right, protecting individuals from unwarranted intrusions into their  
15 private affairs and personal communications.  
16

17 177. Defendants systematically violated Plaintiff's constitutional right to  
18 privacy through deliberate, persistent intrusions that would be highly offensive to  
19 any reasonable person.  
20

21 178. Unconsented Recording and Exploitation of Private Communications:  
22  
23 a. Defendants surreptitiously obtained private and unconsented recordings of  
24 Plaintiff's confidential conversations, most notably a deeply personal phone call  
25 between Plaintiff and Angela Meador discussing sensitive matters. The  
26  
27 unconsented recording of the phone call between Plaintiff and Meador was deeply

1 personal and sensitive because it involved Meador sharing her traumatic  
2 experience as an assault victim who had been kidnapped, drugged, physically  
3 abused, and held captive for three days by actor Marton Csokas, followed by two  
4 years of ongoing harassment and death threats. The conversation was particularly  
5 intimate because Meador explicitly requested privacy and expressed genuine fear  
6 about consequences, while Taft responded with empathy and support as a close  
7 friend who communicated with her nearly daily and was trying to protect her  
8 wellbeing. The violation was especially devastating because both women agreed  
9 the conversation should remain private, yet Barresi obtained this confidential  
10 discussion without consent and weaponized it for years, exploiting Plaintiff's desire  
11 to protect her vulnerable friend and using their private discussion of trauma and  
12 mutual support as a tool for psychological manipulation that prevented them from  
13 maintaining their friendship and caused ongoing re-traumatization to both victims.  
14

15 180. b. Licensed private investigator Heather Cohen on March 21, 2025,  
16 confirmed that Meador clearly stated "no, that she did not consent" to any of the  
17 actions of the phone call being recorded, used, and sent to the Defendant. Meador  
18 appeared visibly shaken and scared, asking Cohen if she was working for "Mr. X"  
19 or the Defendant, and warning Cohen that she had "no idea what you're getting  
20 yourself in the middle of." Cohen assured Meador she was not working for any of  
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1 the people Meador named and that she was not in danger by speaking with her.  
2 The victim herself confirmed that the recording of her private conversation with  
3 Plaintiff was obtained and used without her permission.  
4

5 181. c. Defendant Barresi further violated Plaintiff's privacy by obtaining  
6 and exploiting private text messages and emails between Plaintiff and Meador  
7 without Plaintiff's consent. These communications were particularly sensitive as  
8 they related to Meador's traumatic experiences and Plaintiff's emotional support  
9 and were private conversations never intended for dissemination or Defendant  
10 Barresi's third-party access. Despite the deeply personal and confidential nature of  
11 these exchanges, Defendant Barresi disseminated these communications to others  
12 without authorization from either party, demonstrating Defendants' systematic  
13 pattern of violating Plaintiff's reasonable expectation of privacy in her digital  
14 communications and private affairs.  
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19 182. d. On at least sixteen separate occasions between October 2022 and  
20 December 2024, Defendant Barresi emailed, disseminated, and publicly released  
21 portions of the unconsented recording of Plaintiff and Meador, repeatedly  
22 exploiting the recording of Plaintiff and Meador as instruments of coercion and  
23 emotional distress. As of May 2025, Defendant Barresi still weaponizes and  
24 maintains this unconsented recording of Plaintiff and Meador, against their will.  
25  
26  
27

1 183. e. Between October 2022 and December 2024, Defendant Barresi used  
2 Plaintiff and Meador's unconsented recording of their private phone call without  
3 their authorization and disseminated it to third parties and Defendants, including  
4 publicists and media channels (Melissa Nathan, David Shane, Hiltzik Strategies,  
5 ThatUmbrellaGuy, his YouTube Channels and others). As of May 2025, Defendant  
6 Barresi Barresi still weaponizes and maintains this unconsented recording of  
7 Plaintiff and Meador, against their will.  
8  
9  
10

11 184. f. Defendants' invasion of Plaintiff's private communications with  
12 Meador constituted a particularly egregious violation through the weaponization of  
13 these confidential exchanges to harm both Meador and Plaintiff. Defendants'  
14 systematic intrusion into and exploitation of unconsented recordings of Plaintiff's  
15 phone calls with Meador, along with their private text and email communications,  
16 were deliberately used as instruments of psychological manipulation to cause  
17 Plaintiff PTSD, depression, and flight, freeze, and fight survival responses.  
18 Through their unauthorized access to and dissemination of private text messages  
19 between Plaintiff and Meador showing Meador asking for help and Plaintiff  
20 advising Meador to not recant the violence and threats that happened to her,  
21 Defendants violated the sanctity of these confidential communications. Defendants'  
22 intrusion created a coercive dynamic where Meador was held in a helpless position  
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1 requiring Plaintiff to silence herself in order to protect Meador and unable to  
2 communicate.

3  
4 185. h. Defendants' invasion of Plaintiff's private affairs extended beyond  
5 mere unauthorized access to encompass the deliberate manipulation of these  
6 confidential communications for psychological coercion. Through their  
7 unauthorized possession and exploitation of Plaintiff's private conversations,  
8 Defendants compared the pain and suffering of Plaintiff losing her mother by  
9 evacuating early, to the loss, devastation, and demise that Meador was facing,  
10 claiming that Plaintiff was "abandoning" Meador. Defendants' intrusion into and  
11 weaponization of Plaintiff's private communications with Meador and her  
12 expressed desire to help created a continued trauma of helplessness and twisted  
13 roles inflicted upon Plaintiff without her consent. Defendants connected this  
14 pattern of privacy violations to their broader campaign of traumatization against  
15 both Meador and Plaintiff through Defendants unwanted contact and the public and  
16 private dissemination of the unconsented recordings, thereby obscuring the private  
17 torture they were inflicting through their systematic invasion of Plaintiff's  
18 confidential communications and personal affairs.

19  
20 186. Plaintiff explicitly communicated to beginner journalist Rebecca Berry  
21 that publicizing or Defendant Barresi using or disseminating her private  
22  
23  
24

1 unconsented recording with Meador was against her consent and violated her  
2 privacy rights. On September 28th, when Berry asked about interviewing Angela,  
3 Plaintiff explicitly told Berry that "Angela is scared and still has nightmares" and  
4 that Meador does not want "public pressure" and "actually she's scared of it and  
5 was harassed," and "she didn't want her photos or email either poste[d] publicly or  
6 used..." Plaintiff went into details about the stalking and harassment Meador  
7 experienced after her assault by Csokas.  
8  
9  
10

11 187. Despite Plaintiff's clear warnings about Meador's vulnerability and  
12 explicit objections to any public use of Angela's private communications,  
13 Defendant Barresi continued to exploit the private recording between Plaintiff and  
14 Meador. Defendant Barresi, who held a position of authority over Rebecca Berry,  
15 manipulated Berry and applied financial worth to obtaining private recordings,  
16 using his position of influence over Berry. Berry explicitly informed Barresi that  
17 "Angela is in genuine fear and I'm sure would not consent to her audio being  
18 posted," making Defendant Barresi directly aware of Meador's lack of consent  
19 regarding her recorded conversations.  
20  
21  
22

23 188. Defendants violated Plaintiff's privacy rights by continuing to  
24 wrongfully publicize and disseminate Plaintiff's private unconsented recording  
25 with Meador despite Plaintiff's express objections and clear warnings about the  
26  
27

1 harm this would cause. Defendant Barresi used, sent, publicized, and abused both  
2 Plaintiff and Meador using this private recording that neither woman wanted him  
3 to possess. Defendant Barresi's systematic exploitation of these confidential  
4 communications constituted a deliberate and ongoing invasion of both women's  
5 privacy, causing them harm through the unauthorized dissemination of their  
6 sensitive personal conversation regarding trauma-related matters. This  
7 dissemination not only constituted an invasion of Plaintiff's private affairs but also  
8 endangered both Plaintiff and Meador by exposing their confidential  
9 communications regarding sensitive trauma-related matters without their  
10 authorization, despite Plaintiff having explicitly warned that such exposure would  
11 cause harassment to Angela.

12  
13 189. Plaintiff's reasonable expectation of privacy is supported by *Hill v.*  
14 *National Collegiate Athletic Association*, 7 Cal. 4th 1 (1994), particularly  
15 regarding her sensitive personal details and confidential communications.

16  
17 190. The Ninth Circuit in *Planned Parenthood Federation of America, Inc.*  
18 *v. Center for Medical Progress, et al.*, 890 F.3d 828 (9th Cir. 2018) established  
19 that secretly recording private conversations and publicly disseminating those  
20 recordings constitutes a significant privacy violation.

21  
22 Despite Plaintiff's explicit cease and desist demands, Defendants continued and  
23  
24  
25  
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27

1 escalated their privacy violations, demonstrating willful and malicious disregard  
2 for Plaintiff's rights.  
3

4 191. Defendants aggressively invaded Plaintiff's family privacy by  
5 collecting, exploiting, and threatening to expose sensitive information about her,  
6 her associates, her friends, her communications, her locations, and her family with  
7 intrusive mechanisms.  
8

9 192. Defendants intruded into deceased mother Victoria Taft and family,  
10 obtaining and sending Plaintiff details on her mother with threatening commentary,  
11 intentionally inflicting severe emotional distress. Defendants conducted intrusive  
12 investigations into Plaintiff's family relationships, half-siblings, and personal  
13 history without any legitimate purpose. Defendants threatened media exposure.  
14  
15

16 193. Defendants invaded Plaintiff's privacy by collecting and exploiting  
17 sensitive information about her associates and friends, conducting intrusive  
18 investigations into Plaintiff's friendships and personal associations without  
19 legitimate purpose. Defendants systematically monitored Plaintiff's personal  
20 associations in order to interfere with and damage these relationships.  
21  
22

23 194. Defendant Barresi's secret interstate recording of Plaintiff's father  
24 constitutes intrusion upon Plaintiff's seclusion because it was conducted  
25 specifically to obtain private information about Plaintiff and her family  
26  
27

1 relationships. James Conner, Plaintiff's father, did a signed declaration against  
2 Defendant Barresi's actions and that Defendant Barresi unlawfully recorded him  
3 across state lines, as well as against his consent used and sent his recording and its  
4 contents to cause harassment to his family and him. Two licensed private  
5 investigators, Kountz and Hernandez, in New Mexico confirmed through  
6 interviews with James Conner that Defendants published his audio recording  
7 without consent and altered their contents to be what he did not intend or think.  
8 Defendants' subsequent alteration and unauthorized publication of these recordings  
9 demonstrates calculated invasion of Plaintiff's family privacy and violation of her  
10 reasonable expectation that private family communications would remain  
11 confidential. Defendant Barresi obtained sensitive information.

12  
13  
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15  
16 195. Defendants systematically monitored and collected information about  
17 Plaintiff's movements, residence locations, and whereabouts, conducting ongoing  
18 tracking of her physical presence and location without consent or legitimate  
19 justification.  
20  
21

22 196. Defendants' intrusion into allegations concerning Plaintiff's emotional  
23 care for friends and associates, as well as her deceased mother's emotional care for  
24 friends and associates and sexual matters, constitutes a highly offensive invasion of  
25 the most intimate aspects of personal life. By investigating, secretly recording, and  
26  
27

1 weaponizing deeply personal information and sexual matters about both Plaintiff's  
2 and her mother's emotional care for friends and associates, Defendants deliberately  
3 exploited this sensitive information to estrange friends and cause Plaintiff to  
4 withhold communications. Defendant Barresi purposefully contacted individuals in  
5 disputes with Plaintiff and her family to intrude into past sexual relations against  
6 consent. The use of this intimate information to systematically destroy Plaintiff's  
7 connections with loved ones, friends, associates, and significant others  
8 demonstrates a calculated campaign to weaponize private matters for malicious  
9 purposes. Defendant Barresi threatened to expose this in media. This conduct  
10 exceeds all bounds of decency and represents highly offensive intrusion into  
11 private matters that would be universally objectionable to any reasonable person.  
12 170. Plaintiff had a reasonable expectation of privacy in these intimate personal  
13 matters, as established in *Hill v. National Collegiate Athletic Association*, 7 Cal.  
14 4th 1 (1994).

15  
16 197. Despite Plaintiff's explicit demands to cease and desist, Defendants  
17 continued and escalated their invasions upon her seclusion, demonstrating willful  
18 and malicious disregard for Plaintiff's rights.  
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1 198. As a direct result of these intrusions, Plaintiff has suffered profound  
2 emotional distress, reputational harm, business harm, disruption of her career and  
3 education, and damage to her personal and professional relationships.  
4

5 199. Plaintiff respectfully requests: a. compensatory damages for the severe  
6 harm caused by these privacy violations in an amount to be proven at trial or  
7 amounts to \$2,000,000; b. punitive damages to deter future violations of similar  
8 nature; c. a permanent injunction prohibiting further invasion of Plaintiff's privacy;  
9 d. statutory damages under California Penal Code Section 637.2; e. costs and  
10 attorney's fees as permitted by law; and f. such other relief as the Court deems just  
11 and proper.  
12  
13  
14

15  
16 **THIRD CLAIM FOR RELIEF**  
17 **Violation of California Penal Code §§ 632 and 637.2 (Unauthorized Recording**  
18 **and Disclosure)**  
19

20 200. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
21 Complaint and incorporates the same by reference as if fully set forth herein.  
22

23 201. California Penal Code § 632 makes it illegal to record confidential  
24 communications without the consent of all parties to the communication.  
25 California is a "two-party consent" state, requiring authorization from all  
26 participants for lawful recording of private conversations.  
27

1 202. California Penal Code § 637.2 provides civil remedies for violations of  
2 § 632, allowing injured parties to recover the greater of \$5,000 or three times  
3 actual damages, attorney's fees, punitive damages if the conduct was willful, and  
4 injunctive relief.  
5

6  
7 Plaintiff's Recording in California Establishing Jurisdiction

8 202. On July 28, 2022, Plaintiff recorded her phone conversation with  
9 Angela Meador while Plaintiff was physically located in California, thereby  
10 bringing the recording under California's two-party consent requirements pursuant  
11 to Penal Code § 632.  
12

13 203. During this deeply personal and confidential conversation, Meador  
14 shared traumatic details of her assault, kidnapping, and ongoing harassment by  
15 actor Marton Csokas, explicitly requesting privacy and expressing genuine fear  
16 about potential consequences if the conversation became public. Plaintiff further  
17 alleges this is her unlawful recording.  
18

19 204. Both Plaintiff and Meador explicitly agreed during the call that the  
20 conversation should remain private, with Plaintiff stating "it should never get out  
21 to anyone" and "I don't wanna put you in danger about any of that, so I would  
22 never want that posted."  
23  
24

25  
26 Defendants' Unauthorized Acquisition and Use  
27



1           205. Despite the confidential nature of this communication and the explicit  
2 non-consent of both parties to any disclosure, Defendant Barresi unlawfully  
3 obtained this recording without authorization from either Plaintiff or Meador.  
4

5           206. Defendant Barresi had no lawful right to possess, use, or disseminate  
6 this recording, as he was not a party to the conversation and obtained it through  
7 unauthorized means.  
8

9           207. Both Plaintiff and Meador have consistently maintained that they never  
10 consented to Defendant Barresi's possession, use, or disclosure of their private  
11 conversation.  
12

13           Documented Pattern of Unauthorized Disclosure  
14

15           208. Beginning October 9, 2022, and continuing through December 31,  
16 2024, Defendant Barresi systematically violated California Penal Code § 632 by  
17 repeatedly disclosing and disseminating the unconsented recording in the following  
18 documented instances:  
19

20           209. a. October 2022: Contents in "Exhibit A" of the disclosures of  
21 unconsented recording and sent to publicists including Melissa Nathan, Hiltzik  
22 Strategies, and David Shane; b. October 10, 14, 15, 22, 2022: Multiple email  
23 distributions and unauthorized disclosures to third parties; c. December 16, 28, 31,  
24 2022: Continued unauthorized disclosures through YouTube Channels, Twitter,  
25  
26  
27

1 and Emails; d. October 27, 28, 2023: Repeated unauthorized disclosures with  
2 manipulated content; e. December 31, 2023: Additional unauthorized use four  
3 times; f. January 2024: Ongoing distribution despite cease and desist demands; g.  
4 July 2024: violating disclosure in retaliation for Plaintiff speaking with reporters;  
5  
6 h. December 31, 2024: Latest documented violating unauthorized disclosure on  
7 YouTube advertising channel  
8

9 210. These disclosures were made across multiple platforms and to  
10 numerous third parties, including: YouTube channels (@paulbarresi9713 and  
11 @paulbarresi705), Twitter (PaulBarresi1), Email distributions  
12 ([PaulBarresi@aol.com](mailto:PaulBarresi@aol.com)), Media outlets and publicists, Internet journalists including  
13 ThatUmbrellaGuy  
14  
15

16 Clear Evidence of Non-Consent  
17

18 211. Multiple sources confirm the unauthorized nature of Defendant's  
19 actions:  
20

21 212. a. On March 21, 2025, licensed private investigator Heather Cohen  
22 interviewed Meador, who clearly stated "no, that she did not consent" to the  
23 recording being made, used, or shared with Defendant Barresi. b. Rebecca Berry  
24 explicitly informed Defendant Barresi on October 23, 2022, that "Angela is in  
25 genuine fear and I'm sure would not consent to her audio being posted," providing  
26  
27

1 direct notice of non-consent. c. Explicit Objections: In January 2024, both Plaintiff  
2 and Meador sent explicit demands to "REMOVE THE AUDIOS OFF THE  
3 INTERNET IMMEDIATELY" and stated "WE ARE NOT TO BE USED FOR  
4 YOUR COMMERCIAL GAINS." d. Cease and Desist: Plaintiff's attorney sent  
5 formal cease and desist letter on February 8, 2024, demanding immediate removal  
6 of all recordings.  
7

8  
9 213. Defendant Barresi has documented earnings of hundreds of thousands  
10 of dollars from work that included exploitation of this unauthorized recording and  
11 other unconsented recordings and unauthorized disclosures.  
12

13  
14 214. Defendant Barresi's violations were willful and knowing, as evidenced  
15 by: Direct notice from Rebecca Berry about lack of consent; Explicit demands  
16 from both victims to cease use; Formal legal cease and desist letter; Continued use  
17 despite clear knowledge of non-consent  
18

19 215. Defendant Barresi acknowledged the unauthorized nature by attempting  
20 to manipulate victims into providing retroactive consent through coercion and  
21 threats.  
22

23 216. Defendant Barresi used the unauthorized recording for commercial  
24 advantage, including; Disrupting investigations that would counter his exploitation  
25 of Meador and Plaintiff, generating of media contracts and freelance assignments;  
26  
27

1 Marketing himself through self-promotional websites; Increasing his social media  
2 following from a handful to over 7,000 followers unauthorizingly using the  
3  
4 unconsented recording on these promotional channels and his YouTube channels;  
5 Promoting his self-published book *Johnny Depp's Accidental Fixer* with  
6 threatening exposure  
7

8 217. As a direct and proximate result of Defendants' violations of Penal  
9 Code §§ 632 and 637.2, Plaintiff has suffered:  
10

11 218. a. Severe emotional distress, PTSD, flight/freeze/fight, weight loss,  
12 depression, panic, and anxiety b. Loss of friendship with Angela Meador due to  
13 ongoing exploitation c. Damage to professional reputation and business  
14 relationships d. Financial losses from forced relocation and investigational  
15 measures e. Ongoing psychological trauma from repeated re-victimization  
16  
17

18 219. Defendants' conduct constitutes multiple violations of California Penal  
19 Code § 632 for each unauthorized disclosure of the confidential communication  
20 recorded in California.  
21

22 220. Under Penal Code § 637.2, Plaintiff is entitled to recover the greater of  
23 \$5,000 or three times actual damages for each violation, attorney's fees, punitive  
24 damages, and injunctive relief.  
25  
26  
27

1 221. As a direct result of these intrusions, Plaintiff has suffered profound  
2 emotional distress, reputational harm, business harm, disruption of her career and  
3 education, and damage to her personal and professional relationships.  
4

5 222. Plaintiff respectfully requests: a. compensatory damages for the severe  
6 harm caused by these privacy violations in an amount to be proven at trial or  
7 amounts to \$2,000,000; b. punitive damages to deter future violations of similar  
8 nature; c. a permanent injunction prohibiting further invasion of Plaintiff's privacy;  
9 d. costs and attorney's fees as permitted by law; and e. such other relief as the  
10 Court deems just and proper.  
11  
12  
13

14 **FOURTH CLAIM FOR RELIEF**  
15 **Violation of Cal. Civ. Code § 3344 (Unauthorized Use of Voice, Name and**  
16 **Likeness)**

17 223. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
18 Complaint and incorporates the same by reference as though fully set forth herein  
19 at length.  
20

21 224. California Civil Code § 3344 prohibits the unauthorized use of a  
22 person's name, voice, signature, photograph, or likeness for commercial purposes  
23 without prior consent. The statute provides that any person who knowingly uses  
24 another's identity for advertising, selling, or soliciting purchases of products,  
25 merchandise, goods, or services shall be liable for resulting damages.  
26  
27

1           225. Defendants have violated Civil Code § 3344 by knowingly using  
2 Plaintiff's name, voice, and likeness for commercial purposes without her consent,  
3  
4 resulting in substantial harm to Plaintiff.

5           226. Beginning in October 2022, Defendant Barresi obtained and exploited a  
6  
7 private phone call between Plaintiff and Angela Meador without their consent. He  
8 altered the recording, distributed it for promotional purposes, and used it to  
9  
10 advertise his services on platforms such as YouTube and email under the guise of  
11 his freelance investigative work.

12           227. a) Defendant publicly released the recording approximately at least 16  
13  
14 times across his two YouTube channels ([@paulbarresi9713](#) and [@paulbarresi705](#)),  
15 Twitter (PaulBarresi1), and via email (PaulBarresi@aol.com). These actions  
16  
17 increased his followers significantly—from a handful to over 7,000—and  
18  
19 generated commercial interest and profit, including interactions with media outlets  
20  
21 and publicists such as Melissa Nathan, Hiltzik Strategies, Michael Hiltzik, David  
22 Shane, and others. b) Defendant Barresi sent information on Plaintiff and her  
23  
24 associates to Martin Robinson, Chief Reporter of the Daily Mail in release of his  
25  
26 book and to the Daily Mail. c) Defendant Barresi prepared media articles, and  
27  
28 excerpts for distribution, and cited Plaintiff and Meador's recording to publicists

1 228. (a) Barresi has been documented to have earned hundreds of thousands  
2 of dollars from this work and selling drafts to media outlets. (b) Starting October  
3 2022, Defendant Barresi sent the unauthorized recording of Plaintiff and Meador to  
4 publicists. Defendant Barresi's self-promotional sites, <https://paul-barresi.com>,  
5 <https://paul-barresi.com/articles>, show using Plaintiff and Meador's unconsented  
6 recordings to his commercial advantage with associated articles (*American Media*  
7 *Inc*, *RadarOnline*, *Daily Mail*, *New York Daily News*, *New York Post*, *News 24*,  
8 *Page 6*, and YouTube Channels) and his book for sale, *Johnny Depp's Accidental*  
9 *Fixer* in July 2024. Defendant Barresi sent Plaintiff and Meador's unconsented  
10 recording to internet journalists, including ThatUmbrellaGuy. His promotional  
11 YouTube channels ([@paulbarresi9713](#) and [@paulbarresi705](#)), further display  
12 Plaintiff's voice and identity, and her and Meador's recording, to attract media  
13 contracts, media assignments, and freelance assignments. (c) Defendant Barresi  
14 sought payment through his association with Adam Waldman.

15 229. Despite multiple notifications that no consent was given, including:

- 16 • Plaintiff's clear statement during the call: "*No, I won't post it.*"
- 17 • A warning from Rebecca Berry on October 23, 2022, stating

18 "*Angela is in genuine fear and I'm sure would not consent to*  
19 *her audio being posted.*"

- Explicit objections from both Plaintiff and Meador in January 2024 that the use was “illegal,” “non-consensual,” and “commercially exploitative.”
- A Cease and Desist letter sent by Plaintiff’s attorney at Bevar and Jones on February 8, 2024: “We are in receipt and in possession of your multiple YouTube videos and postings... a clear intrusion of Ms. Taft’s solitude where you have appropriated her name and, or likeness... DEMAND IS HEREBY MADE, that you immediately RETRACT and REMOVE all of your social media posts on YouTube and, or on any other online platform, blog, sign or other published, written, or audio form related to this matter.”

229. Defendants continued using the recording for commercial advantage, financial gain and as a coercive tool, particularly to manipulate Plaintiff and Meador into forced statements and recanted statements fitting Defendants’ narratives. Plaintiff’s voice and Meador’s trauma was repeatedly commercialized in efforts to secure advantage in media, legal, and entertainment markets.

230. Defendant's actions caused severe harm, including emotional distress, loss of business relationships, damage to professional reputation, financial damage, and forced relocation for safety (California to Hawaii to France).



1           231. This conduct constitutes unauthorized commercial exploitation,  
2 violation of Plaintiff's right of publicity, and intentional infliction of emotional  
3 distress, warranting injunctive and compensatory relief.  
4

5           232. Defendants' conduct constitutes a knowing and deliberate violation of  
6 Civil Code § 3344, as they intentionally used Plaintiff's identity for commercial  
7 advantage despite clear knowledge that they lacked consent to do so.  
8

9           233. Under Civil Code § 3344, Plaintiff has the fundamental right to control  
10 the commercial use of her identity. As established in *Abdul-Jabbar v. Gen. Motors*  
11 *Corp.*, 85 F.3d 407, 409 (9th Cir. 1996), the statute prohibits the unauthorized  
12 commercial use of an individual's likeness, particularly when used for promotional  
13 or marketing purposes. Similarly, in *Eastwood v. Superior Court (National*  
14 *Enquirer, Inc.)* (1983) 149 Cal.App.3d 409, Clint Eastwood successfully won his  
15 appeal for unauthorized use of his voice and likeness that was exploited for  
16 commercial advantage, setting clear precedent for protection against such  
17 unauthorized uses.  
18  
19  
20  
21

22           234. The content used by Defendants—including Plaintiff's voice, name, and  
23 likeness—belonged solely to Plaintiff. Defendants had no proprietary rights to  
24 these personal attributes.  
25

26 Defendants' actions constitute a clear violation of California Civil Code § 3344, as  
27

1 they knowingly used Plaintiff's name, voice, and likeness for commercial  
2 advantage without consent, causing substantial harm to Plaintiff.  
3

4 235. Defendants acted with full knowledge that their conduct was  
5 unauthorized and harmful to Plaintiff, demonstrating a willful and deliberate intent  
6 to exploit Plaintiff's identity for commercial gain.  
7

8 236. Plaintiff respectfully requests this Court award: a. compensatory  
9 damages for all harm caused by Defendants' unauthorized use of Plaintiff's name,  
10 voice, and likeness, in an amount to be proven at trial or amounts to \$2,000,000; b.  
11 statutory damages as provided under Civil Code § 3344, including minimum  
12 statutory damages of \$750, actual damages, profits derived from the unauthorized  
13 use, and attorney's fees and costs; c. punitive damages in an amount sufficient to  
14 punish Defendants for their willful misconduct and deter similar future conduct; d.  
15 a temporary and permanent injunction prohibiting Defendants from any further use  
16 of Plaintiff's name, voice, likeness, or other personal attributes for any purpose;  
17 and e. such other and further relief as this Court deems just and proper.  
18  
19  
20  
21

22 237. Plaintiff further requests this Court enter an award of punitive damages  
23 against Defendants for their fraud, oppression, and malice toward Plaintiff, as  
24 evidenced by their deliberate and repeated exploitation of her identity despite  
25  
26  
27

1 knowledge that such use was unauthorized and harmful.  
2  
3

4 **FIFTH CLAIM FOR RELIEF**  
5 **Civil Harassment (California Code of Civil Procedure § 527.6)**

6 238. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
7 Complaint and incorporates the same by reference as if repeated herein in their  
8 entirety.  
9

10 239. California Code of Civil Procedure § 527.6 defines Civil Harassment as  
11 (1) unlawful violence, a credible threat of violence, or (2) a pattern of conduct that  
12 seriously alarms, annoys, or harasses another person, and that serves no legitimate  
13 purpose. The conduct must be such that it would cause a reasonable person to  
14 suffer substantial emotional distress. Defendants engaged in persistent conduct of  
15 harassment against Plaintiff and her associates.  
16  
17

18 240. Defendants have engaged in a persistent pattern of harassing conduct  
19 directed at Plaintiff and those she cares about for the years of 2022, 2023, 2024,  
20 2025 and to the present day. This harassment extends beyond Plaintiff to  
21 encompass her family members, friends, business associates, and witnesses—  
22 creating a web of intimidation designed to isolate and terrorize Plaintiff. This  
23 harassment includes, but is not limited to: Defendant Barresi unwantingly called,  
24 emailed, and texted Plaintiff, Plaintiff's associates, Plaintiff's friends, and  
25  
26  
27

1 Plaintiff's family members; Making repeated threats that reasonably placed  
2 Plaintiff and those she cares about in fear for their safety; Engaging in tracking of  
3 Plaintiff, her associates, and her loved ones, and constantly monitoring their  
4 whereabouts; Exploiting private audio recordings of Plaintiff and her  
5 conversations with friends without consent to intimidate and coerce them;  
6  
7 Repeatedly sending harassing communications containing disturbing and traumatic  
8 content about Plaintiff's deceased mother Victoria and vulnerable woman Meador,  
9 causing trauma not only to Plaintiff but also to her family members and friends;  
10

11  
12 241. Making explicit and implicit mortality ideation toward Plaintiff and  
13 implying similar threats toward her associates, including statements and actions  
14 that she should suffer, have mortality, and that Plaintiff, her vulnerable friends,  
15 loved ones, and associates should suffer, have emotional distress, and not live  
16 freely; Creating a climate of fear for Plaintiff and her circle by repeatedly implying  
17 connections to violence; Contacting Plaintiff's business associates, friends, and  
18 potential witnesses to intimidate them, creating a chilling effect that has isolated  
19 Plaintiff from her support network; and Continuing this pattern of harassment  
20 against Plaintiff and those close to her despite Cease and Desist demands.  
21

22 242. This harassment satisfies the statutory definition under California Code  
23 of Civil Procedure § 527.6 because: It constitutes an intentional and knowing  
24  
25  
26  
27

1 course of conduct directed at Plaintiff and her circle of loved ones and associates;  
2 The conduct serves no legitimate purpose; The conduct would cause a reasonable  
3 person to suffer substantial emotional distress for themselves and those they care  
4 about; and Plaintiff has in fact suffered substantial emotional distress as a direct  
5 result of Defendants' conduct toward her and her loved ones.  
6  
7

8 243. Defendants have engaged in a deliberate strategy of targeting not just  
9 Plaintiff, but those she cares about, in order to maximize her distress and coerce  
10 her compliance. Specifically: Defendants contacted Plaintiff's associates and  
11 intimidated them regarding their family's safety connecting it to Plaintiff;  
12 Defendants exploited an unconsented recording of Plaintiff's phone call  
13 conversation with Angela Meador, causing distress to both women and damaging  
14 their friendship, and Defendant Barresi unconsentingly recorded and distributed a  
15 recording of her father James Conner, who declared he wanted the harassment  
16 from Defendant Barresi to his family to stop; Defendants impugned and threatened  
17 Plaintiff's friends, associates, and others who witnessed the harassment; Defendant  
18 Barresi repeatedly made disturbing statements to Plaintiff and about Plaintiff's  
19 mother Victoria Taft, including sending her coroner's report to Plaintiff;  
20 Defendants threatened and impugned witnesses who Taft cared about, befriended,  
21 and who had provided information to Plaintiff; Defendants took information from  
22  
23  
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1 Plaintiff's associates, vulnerable associates, and associates in disputes with  
2 Plaintiff in order to impugn; and Defendants' threats extended to Plaintiff's family  
3 members and her associates' family members.  
4

5 244. As a result of this wide-ranging harassment campaign targeting Plaintiff  
6 and her loved ones, Plaintiff has been forced to: Relocate her residence multiple  
7 times, including leaving the state of California and eventually the country, to  
8 protect herself and reduce the risk to those close to her; Withdraw from her  
9 Master's in Business program at American University; Sever professional  
10 relationships, including with SaveMeNow and Aedan (now TurnKeyCapital), to  
11 prevent Defendants from harming these associates; Expend substantial resources  
12 on security, private investigators, and legal assistance to protect herself and those  
13 she cares about; and Suffer ongoing fear, anxiety, and trauma about the safety of  
14 herself and her loved ones that has significantly impaired her daily functioning and  
15 professional activities, and caused PTSD, flight/freeze/fight primal survival.  
16  
17  
18  
19  
20

21 245. Defendants' harassment is particularly egregious given their explicit  
22 acknowledgment of the harm their conduct would cause to Plaintiff and those she  
23 cares about. a. For example, Defendant Barresi repeatedly threatened Plaintiff  
24 about having personnel and security target her in the years of 2022 to 2025,  
25 demonstrating how Defendants weaponized fear for Plaintiff's loved ones, friends,  
26  
27

1 and associates. b. Defendants' pattern of harassment is evidenced by the  
2 approximately 65 text messages and 17 emails sent by Barresi to Plaintiff between  
3  
4 in 2022, more emails in 2023, and over 20 emails in 2024, and aggressively  
5 mentioned Plaintiff explicitly in name over 351 times with hundreds of additional  
6 references in the approximately 3 years, with the repetition alone, being enough to  
7  
8 cause a reasonable person to fear for their safety, as well as the numerous other  
9 communications to Plaintiff and those close to her documented throughout this  
10  
11 Complaint.

12 246. c. The Defendant Barresi repeatedly demonstrates serious mental health  
13 problems and aggression, which appear to be mortality ideations, bipolarism,  
14 delusions of reference, and delusions of grandeur, causing the Plaintiff, her  
15 associates, her family, her friends and witnesses to reasonably fear for their safety;  
16  
17

18 247. Courts have recognized that harassment can extend to a plaintiff's circle  
19 of loved ones as part of a pattern of harassing conduct. In *Huntingdon Life*  
20 *Sciences, Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.*, 129 Cal.App.4th 1228  
21 (2005), the court found that targeting a plaintiff's associates, vulnerable friends,  
22 and family members can constitute actionable harassment against the plaintiff.  
23  
24

25 248. Plaintiff obtained a Temporary Restraining Order in Hawaii (3DSS-25-  
26 0000044) in January 2025 to April 2025, meeting California Code of Civil  
27

1 Procedure § 527.6, though not in California, due to the barriers deliberately created  
2 by Defendants, including Plaintiff being overseas, and by Defendant Barresi's aura  
3 of repeated unwanted intrusions and derangement, intimidating legal support who  
4 might represent Plaintiff and needing to subpoena witnesses to support her claims.  
5

6  
7 249. Plaintiff respectfully requests that this Court: a. issue a permanent  
8 injunction prohibiting Defendants from harassing, threatening, surveilling,  
9 contacting, or otherwise interfering with Plaintiff and those she cares about,  
10 including her family members, friends, business associates, and potential  
11 witnesses; b. award compensatory damages for the emotional distress, professional  
12 harm, and financial losses caused by Defendants' harassment of Plaintiff and her  
13 loved ones in an amount to be proven at trial;  
14  
15 c. award punitive damages in an amount sufficient to punish Defendants and deter  
16 similar conduct in the future; and d. grant such other and further relief as the Court  
17  
18 deems just and proper.  
19

20  
21 **SIXTH CLAIM FOR RELIEF**  
22 **Stalking (Civil Code § 1708.7)**

23 250. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
24 Complaint and incorporates the same by reference as though fully set forth herein  
25 at length.  
26  
27



1           251. California Civil Code § 1708.7 (Stalking) establishes civil liability for  
2 stalking when a plaintiff proves the following elements: (1) the defendant engaged  
3 in a pattern of conduct with the intent to follow, alarm, place under surveillance, or  
4 harass the plaintiff; (2) as a result of that pattern of conduct, either the plaintiff  
5 reasonably feared for their safety or the safety of an immediate family member, or  
6 the defendant violated a restraining order; and (3) the plaintiff's allegations are  
7 supported by independent corroborating evidence. The statute defines "pattern of  
8 conduct" as a series of acts over time, however short, evidencing a continuity of  
9 purpose.  
10

11  
12  
13           252. Defendants are in direct violation of Civil Code § 1708.7 because they  
14 engaged in a persistent pattern of conduct with the intent to follow, alarm, place  
15 under surveillance, and harass Plaintiff. This pattern of conduct is evidenced by  
16 Defendants' continuous monitoring of Plaintiff's whereabouts, communications,  
17 and activities; their repeated unwanted contacts with Plaintiff and her associates;  
18 and their deliberate efforts to track Plaintiff across state lines and foreign countries.  
19  
20  
21

22           253. Defendants' pattern of conduct is evidenced by numerous documented  
23 instances spanning from approximately three years of 2022, 2023, 2024, 2025 to  
24 the present, during which Defendants have systematically monitored Plaintiff's  
25  
26  
27

1 physical locations, intercepted and exploited her private communications, and  
2 continuously attempted to surveil her movements and social connections.  
3

4 254. Defendants' pattern includes, but is not limited to: (a) Defendant  
5 Barresi's repeated public disclosure of Plaintiff's changing locations, including her  
6 moves to Hawaii, France, and other locations; (b) Defendants' unauthorized  
7 recording and dissemination of Plaintiff's private conversations; (c) Defendants'  
8 continuous attempts to identify and disclose Plaintiff's place of residence; and (d)  
9 Defendants' persistent efforts to track Plaintiff's movements and relationships.  
10  
11 As demonstrated throughout this Complaint, Defendants have engaged in these  
12 activities with the specific intent to alarm, harass, and place Plaintiff under  
13 surveillance. Defendants' intent is evidenced by their explicit statements regarding  
14 their monitoring of Plaintiff, their claims of knowing her whereabouts, and their  
15 repeated references to her attempts to relocate to avoid their harassment.  
16  
17

18 255. Defendant Barresi deliberately contacted Plaintiff and Plaintiff's  
19 associates through unwanted calls, emails, and text messages. Defendant Barresi  
20 takes nearly daily actions against Plaintiff and her associates for practically 24/7  
21 reasonable concerns. Defendant Barresi dictated consequences to compel Plaintiff  
22 and her associates to take specific actions or withhold certain actions, including by  
23 threatening consequences from private security and personnel in retaliation.  
24  
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1           256. Barresi's obsessive focus on Plaintiff is further evidenced by the  
2 documented frequency of explicit mentions of Plaintiff via name by Defendant  
3 Barresi, totaling at least 351 instances from September 2022 through May 8, 2025,  
4 with a clear pattern of explicit escalation, gathered with the forensic Hunchly  
5 program: approximately 48 mentions in 2022, 107 mentions in 2023, 122 mentions  
6 in 2024, and 79 mentions in just the first four months of 2025 (as of May 8, 2025).  
7 With each explicit instance are repeated mentions of Plaintiff without her name  
8 explicitly, totaling nearly 900 times. Defendant Barresi further continually attached  
9 her mother Victoria Taft, her family, and her friends to his harm to Plaintiff. These  
10 instances further include harm to her loved ones and associates.

15           257. Defendant Barresi exploited Plaintiff and Angela Meador's unconsented  
16 recording of their phone call approximately at least 16 times in emails to Plaintiff  
17 and to other individuals (incidents from 2022 to August 2024), released the  
18 unconsented recording on his multiple YouTube Channels, and his Twitter Profile  
19 (PaulBarresi1): and, again in December 2024 to being held for leverage by  
20 Defendant Barresi in 2025 and to the present. Defendant Barresi further repeatedly  
21 and unwantingly weaponized Plaintiff's father Conner's unconsented recording  
22 that Barresi unlawfully recorded to convey disturbing "deadly" and forceful  
23 consequences to re-traumatize Plaintiff, Meador and associates of Plaintiff; His  
24  
25  
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1 entire channels for approximately 3 years are about Plaintiff, her associates,  
2 family, loved ones, and vulnerable friends.  
3

4 258. Defendants' pattern of conduct has caused Plaintiff to reasonably fear  
5 for her safety and the safety of her immediate family members. Plaintiff's fear is  
6 reasonable given Defendants' explicit threats, including: (a) Defendant Barresi's  
7 statements about "fearing for her life"; (b) Defendant Barresi's repeated references  
8 to vulnerability, unknown assailants, guns, assaults, and her associates being  
9 "deathly afraid," (c) Defendant Barresi's threatening references to Plaintiff's floor  
10 of residence in context to someone falling off the roof; (d) repeated statements by  
11 Defendant Barresi with mortality ideation for her and loved ones to die, "suffering  
12 to take her last breath," and have emotional distress, (e) sending Plaintiff texts of  
13 her associate Meador pleading for help in text messages to her; (f) texting and  
14 emailing on her half siblings vulnerability and risk of abuse, and (g) numerous  
15 references to violence, death, and harm directed at Plaintiff, her family and friends.  
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21 259. Plaintiff's allegations are supported by substantial independent  
22 corroborating evidence, including but not limited to: (a) electronic messages and  
23 recordings from Defendants containing threats and intimidation; (b) witnesses who  
24 observed Defendants' threatening behavior; (c) reports filed with law enforcement  
25 (d) a Granted Temporary Restraining Order in Hawaii protecting Plaintiff from  
26  
27

1 Defendant Barresi; (e) reports documenting Defendants' activities; and (f) licensed  
2 private investigators' statements confirming Defendants' pattern of stalking  
3 conduct. Defendants' pattern of stalking behavior has forced Plaintiff to repeatedly  
4 relocate, including leaving her residence in California, relocating to Hawaii, and  
5 ultimately leaving the United States altogether to escape the persistent surveillance  
6 and threats. Plaintiff has been forced to live in continuous fear, radically altering  
7 her daily activities and living arrangements to avoid Defendants' stalking.  
8  
9

10  
11 260. In the years, Defendant Barresi escalated his stalking behavior by  
12 Defendant Barresi's deliberate sexualization of Plaintiff, her family members, and  
13 associates as a form of psychological harm, including making sexually explicit and  
14 degrading comments about Plaintiff and her deceased mother, threatening to  
15 publish sexually humiliating claims about her family members in commercial  
16 publications, and using crude sexual references as tools of harassment and control  
17 designed to further dehumanize and terrorize Plaintiff; conducting obsessive  
18 surveillance of her communications and relationships, repeatedly contacting her  
19 associates and family members with messages, exploiting unconsented recordings  
20 as tools of psychological coercion, engaging in coordinated harassment campaigns  
21 across multiple platforms, and systematically attempting to isolate her from  
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1 support networks through intimidation tactics, which demonstrates his intent to  
2 continue placing Plaintiff under surveillance and to cause her to fear for her safety.  
3

4 261. Defendant Waldman was aware of, acquiesced, and participated in this  
5 pattern of conduct, continuously rewarding and encouraging Defendant Barresi's  
6 stalking behavior despite clear knowledge of its harmful effects on Plaintiff.  
7

8 262. Defendants' stalking has caused Plaintiff to suffer significant emotional  
9 distress, financial loss, and disruption to her personal and professional life. The  
10 stalking behaviors by Defendants were intentional, malicious, and designed to  
11 cause substantial harm to Plaintiff.  
12

13 263. Under Civil Code § 1708.7(c), Defendants are liable to Plaintiff for  
14 general damages, special damages, and punitive damages for their stalking  
15 conduct. Additionally, under Civil Code § 1708.7(d), Plaintiff is entitled to  
16 equitable relief, including an injunction to prevent further stalking.  
17

18 264. Therefore, Plaintiff asks this Court to hold Defendants liable for  
19 damages, both jointly and severally, as allowed by law, in an amount to be proven  
20 at trial, currently estimated in excess of \$2,000,000 for the costs to Plaintiff,  
21 including corrections with investigations and security during an ongoing co-  
22 conspiracy between Defendants, and to temporarily and permanently enjoin  
23 Defendants from stalking Plaintiff as alleged herein.  
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1 265. Plaintiff also asks the Court to enter an award of punitive damages  
2 against Defendants for their malicious and willful stalking of Plaintiff, causing her  
3 to reasonably fear for her safety and forcing her to flee her residence and country.  
4

5 266. Plaintiff respectfully requests that this Court issue an injunction against  
6 the Defendants, to prevent further stalking of Plaintiff. This request is made  
7 pursuant to Civil Code § 1708.7(d), which expressly provides for equitable relief,  
8 including injunctions, in stalking cases.  
9  
10

11 **SEVENTH CLAIM FOR RELIEF**  
12 **Civil Conspiracy**

13 267. Plaintiff Ms. Taft re-alleges all paragraphs within this lawsuit and  
14 incorporates the same by reference as if repeated herein in their entirety.  
15

16 268. Civil conspiracy refers to an agreement between two or more parties to  
17 commit a wrongful act or to achieve a lawful end by unlawful means, causing harm  
18 to another person.  
19

20 269. The evidence demonstrates that Defendants entered into an agreement  
21 to harm Plaintiff beginning in 2022. Their civil conspiracy is documented through  
22 recorded phone conversations where they discussed coordinating efforts against  
23 Plaintiff and witnesses. As early as April 2020, Defendants began their association,  
24 which turned against Plaintiff by September 2022 when Plaintiff discovered  
25 witnesses connected to the Viper Room and re-interviewed individuals.  
26  
27

1 270. The civil conspiracy timeline shows a clear pattern:

2 a. In 2022, after Plaintiff spoke with witnesses from the Viper Room and  
3 victims of assaults and crimes, perceived as potential “Johnny witnesses”  
4 or “Amber witnesses,” Defendants began targeting her directly;

5  
6 b. In 2022, after Plaintiff spoke with witnesses from the Viper Room and  
7 victims of assaults and crimes, Defendants began targeting her directly.

8 Defendants have harmed Plaintiff, her family, and her associates for  
9 approximately 3 years. Defendants coordinated efforts to control the  
10 narrative and individuals that would be useful to their goals, even if it  
11 meant harming "Johnny witnesses" and family members of individuals in  
12 their wake;  
13

14 c. By October 2022, Defendants escalated their tactics by obtaining and  
15 exploiting an unconsented recorded phone call between Plaintiff and an  
16 assault victim, Angela Meador, using it repeatedly for coercion and  
17 sending it to publicists, as well as to internet journalists;

18 d. Defendant Barresi and Waldman coordinated publicists about Plaintiff  
19 and her unconsented recording with Meador, which involved publicists  
20 Melissa Natha, Hiltzik Strategies, and David Shane;  
21  
22  
23  
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1 e. In the December 2022 incidents, Defendant Barresi released a  
2 recording of Waldman revealing their coordinated efforts to target those  
3 who "went against" them, describing both "complex and simple"  
4 harassment methods that were "very elaborate" and "expensive." This  
5 unconsented recording named Plaintiff, her mother, and associates; and  
6 in Defendant Barresi's phone call between him and Waldman,  
7 unwantingly including Plaintiff in this recording, he promoted this  
8 message with commentary about vandalism, break-ins against witnesses  
9 and against Plaintiff's associate's reports;  
10

11 f. From January to May 2024, Defendants continued actions harmed  
12 Plaintiff and people she cared about, exploited unconsented recordings,  
13 caused her to file multiple reports with federal authorities, while  
14 witnesses suffered, media spawned, and Anthony Fox's case unresolved;  
15

16 g. Defendant Barresi released the book *Johnny Depp's Accidental Fixer*  
17 in July 2024 with Waldman accepting, and continued to force actions  
18 against Plaintiff and her associates, as well as leveraged unconsented  
19 telephone recordings, for their public and private benefit;  
20  
21

22 271. h. Defendants took Plaintiff's rights of association, free speech, and  
23 from communicating with individuals useful to them for their advantages;  
24  
25  
26  
27

1 i. Defendants by intentionally and negligently doing actions against  
2 Plaintiff by civilly harming Plaintiff's rights, intruding into privacy of  
3 private affairs and conversations, intruding into her seclusion,  
4 unauthorized use of Plaintiff's voice/name/likeness, stalking, civilly  
5 harassing, and causing emotional distress both intentionally and  
6 negligently, hereby effectuated their strategy;  
7  
8

9 272. Throughout this timeline, Defendants' agreement manifested through  
10 their actions:  
11

12 a. They exchanged information about Plaintiff, her family, her associates,  
13 her friends, her communications, her assets, and witnesses;  
14

15 b. Defendant Barresi leveraged unconsented recordings, invasive  
16 information, and media releases simultaneously, while repeatedly  
17 involved with Waldman;  
18

19 c. Defendant Barresi, despite causing significant financial hardships to  
20 "all sides" still continued to receive accolades and lack of stop orders  
21 from Waldman; and  
22

23 d. Defendants maintained continuous communication about their shared  
24 objectives.  
25  
26  
27

1 273. Defendants manipulated the media to obscure the harms done by  
2 Defendant Barresi and Defendants. Defendants removed Victoria Taft's Tribute  
3 article in the Associated Press in 2023, which had original interviews with  
4 Victoria's brother Don Debaun and friend, Lori Mattix. This action demonstrates  
5 conduct directed toward Ms. Taft and her family's reputation. Further, Defendants  
6 caused recantations in the press, namely an ABC article that Defendant Barresi  
7 perused on Plaintiff's Rescue Social Inc repository, of Defendant Barresi being  
8 involved in harm towards former clients while freelancing with Anthony Pellicano,  
9 demonstrating maliciousness towards pushing Defendant Barresi's activities to the  
10 harm of others against Plaintiff's pleading to stop.

15 274. As a result of this civil conspiracy, Plaintiff suffered concrete harms: a.  
16 She was isolated from professional and personal relationships b. She lost  
17 significant business opportunities, including board positions and contracts c. She  
18 was forced to relocate multiple times, eventually leaving the country d. She  
19 incurred substantial costs for security and investigations e. She suffered severe  
20 emotional distress.

23 275. The elements of civil conspiracy are clearly established through this  
24 factual timeline. Defendants purposefully acted in concert to harm Plaintiff through  
25  
26  
27

1 multiple unlawful means, including invasion of privacy, stalking, deprivation of  
2 civil rights, unauthorized use of voice/likeness, harassment and spanning years.  
3

4 276. Under established legal precedents, including *Applied Equipment Corp.*  
5 *v. Litton Saudi Arabia Ltd.*, 7 Cal. 4th 503 (1994) and *Spencer v. Mowat*, 260 Cal.  
6 Rptr. 3d 372, 377 (2020), both Defendants are liable for all acts undertaken in  
7 furtherance of their conspiracy, regardless of which Defendant personally  
8 performed specific acts.  
9

10  
11 277. The civil conspiracy continues to this day, with Defendants still  
12 targeting Plaintiff, monitoring her communications, inflicting emotional distress.  
13

14 278. Therefore, Plaintiff asks this Court to hold Defendants liable for  
15 damages, both jointly and severally, as allowed by Law, in an amount to be proven  
16 at trial, currently estimated in excess of \$2,000,000. These costs include expenses  
17 for investigations, security, relocation, and lost business opportunities directly  
18 resulting from Defendants' civilly conspiratorial actions. Plaintiff also requests the  
19 Court to temporarily and permanently enjoin Defendants from continuing their  
20 civil conspiracy against Plaintiff and persons associated with her.  
21

22  
23 279. Plaintiff also asks the Court to enter an award of punitive damages  
24 against Defendants for their fraud, oppression, and malice toward Plaintiff.  
25

26 **EIGHTH CLAIM FOR RELIEF**  
27 **Negligence**

1           280. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
2 Complaint and incorporates the same by reference as if repeated herein in their  
3 entirety.  
4

5           281. Defendants Barresi and Waldman owed Plaintiff a duty of care, which  
6 required them to exercise reasonable care in their conduct toward her.  
7

8           282 A. Defendants owed a duty of care to not impede and interfere with  
9 Plaintiff's constitutional rights to association and speech, including her right to  
10 communicate with individuals that Defendants sought to influence or impede, her  
11 vulnerable friends, or with potential witnesses, regardless of their viewpoints. Any  
12 wrongful restriction of Plaintiff's associational and speech rights constitutes a  
13 breach of the duty of care obliged to her as a fellow member of the professional  
14 community and as a person entitled to fundamental constitutional protections.  
15  
16  
17

18           283 B. Defendants owed a duty of care to refrain from harming Plaintiff's  
19 family members, including her mother, half-siblings, and other family members, as  
20 any decent human being has a fundamental duty not to cause harm to innocent  
21 family members of individuals with whom they have disputes or business interests  
22

23           284. Defendants breached this duty of care through their reckless and  
24 harmful actions directed at Plaintiff. Defendants claim to freelance for and work  
25 with individuals in the Arts, owing a duty of care. Waldman was warned about  
26  
27

1 Defendant Barresi's reputation as a "celebrity stalker." Plaintiff is an entrepreneur,  
2 fourth generation in the film business, and having start-ups for the purpose of  
3 rescue within the Field of Public Safety, which includes people in the film, music,  
4 and arts as part of the visual and performing arts business. Plaintiff sent ceases and  
5 desists to Defendants. Defendants negligently pursued their agendas with complete  
6 disregard for the foreseeable harm their actions would cause to Ms. Taft.  
7

8  
9 285. Plaintiff has witnessed and been victimized by Defendant Barresi and  
10 Adam Waldman taking Plaintiff's rights to association, invasion of privacy,  
11 unauthorized use of voice and likeness, and inflictions of emotional distress in their  
12 conduct, demonstrating a clear breach of the duty of care owed to Plaintiff.  
13  
14

15 286. Defendants knew their recorded audio materials were obtained without  
16 consent, yet negligently and recklessly used and distributed them. Defendant  
17 Barresi, while associating himself to Adam Waldman, repeatedly created  
18 vulnerabilities in Taft by impugning her friends, associates, witnesses, assault  
19 victims, and mother Victoria, while further implying violence, and other figures.  
20 Defendant Barresi weaponized unconsented recordings. Defendant Barresi laced  
21 two other critical calls with violence and exploitation, a phone call of Plaintiff with  
22 an assault victim, Meador, which traumatizes Taft to this day for Defendants  
23  
24  
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1 creating violence against Meador, who Taft treated as a friend and cares about.

2 This call and one with James Conner were sent to publicists and private authority.  
3

4 287. Plaintiff and Meador expressed multiple concerns about privacy while  
5 describing a pattern of retaliation and violence, and throughout the conversation,  
6 Taft displays consistent sympathy for Meador's situation regarding her trauma. The  
7  
8 unconsented recordings were known by both Defendants to be obtained without  
9 permission, as evidenced by Defendant Barresi's obtaining of the unconsented  
10  
11 audio recording of Plaintiff and Meador, who had pleasant interactions before Mr.  
12 Barresi's exploitation of their audio. Defendants also unconsentedly recorded  
13  
14 Plaintiff's father Conner and repeatedly used these recordings to instill fear and  
15 coercion against Plaintiff and her associates. Despite knowing these conversations  
16 were private and confidential, Defendants negligently obtained and exploited these  
17  
18 recordings, with Defendant Barresi editing the audio and adding imagery of  
19  
20 traumatizing violence. The recorded evidence explicitly confirms the unconsensual  
21 nature of the recordings, as the original phone recording contained Taft having no  
22 consent and agreeing with Meador: "it should never get out to anyone" and "I don't  
23  
24 wanna put you in danger about any of that, so I would never want that posted."  
25 Plaintiff suffered financially and emotionally as a direct result of Defendants'  
26 negligence in exploiting these clearly non-consensual recordings.  
27

1           288. Defendants negligently exploited these recordings for their own  
2 purposes, with reckless disregard for the harm caused to Plaintiff. Defendant  
3 Barresi sent the unconsented phone call audio to publicists (Melissa Nathan,  
4 Hiltzik Strategies, David Shane, and others) to internet journalists, sent it in emails,  
5 onto YouTube, and Twitter, between 2022-2024, while still leveraged in 2025.  
6  
7

8           289. Defendant Barresi perceives Plaintiff as an obstacle and rival to his  
9 agendas of intrusion, exploitation, control, stalking, and torment of people in the  
10 Arts. This perception led to negligent actions that directly harmed Plaintiff.  
11

12           290. Defendant Barresi negligently coordinated harm to Plaintiff, her  
13 associates, witnesses, and victims, despite having actual knowledge of the harm  
14 being inflicted on these individuals and despite Plaintiff's repeated cease and desist  
15 pleadings. Defendant Waldman provided negligent oversight while knowing the  
16 substantial risks involved in Defendant Barresi's coordinated campaign of harm.  
17 This coordinated exploitation and the negligent oversight that enabled it directly  
18 resulted from Defendants' breach of their duty of care.  
19  
20  
21

22           291. Defendants removed Victoria's Tribute article in the Associated Press  
23 in 2023, which had original interviews with Victoria's brother Don Debaun and  
24 friend, Lori Mattix. This distressed Plaintiff. This action demonstrates negligent  
25 and harmful conduct directed toward Ms. Taft and her family's reputation.  
26  
27



1           292. Defendant Barresi deliberately and negligently contacted Plaintiff's  
2 associates through unwanted calls, emails, and text messages. Defendant Barresi  
3 threatened consequences to compel Plaintiff and her associates to take specific  
4 actions or withhold certain actions, including by threatening consequences from  
5 private security. This pattern of unwanted contact and intimidation Demonstrates  
6 Defendant Barresi's negligent disregard for the boundaries and safety of Plaintiff  
7 and those associated with her.  
8  
9  
10

11           293. Defendants negligently coordinated with media outlets in connection  
12 with Defendant Barresi's July 2024 release of the book *Johnny Depp's Accidental*  
13 *Fixer*, which commercially exploited Plaintiff's private information and that of her  
14 associates and witnesses. Defendant Barresi sent drafts to Plaintiff claiming he  
15 would release family information into media, and Defendant Waldman accepted  
16 and condoned this media coordination despite clear knowledge of the negligence  
17 involved in harming Plaintiff, her associates, and witnesses through this  
18 commercial publication and accompanying media campaign.  
19  
20  
21

22           294. The exploitation of Plaintiff's private information and the experiences  
23 of her associates, vulnerable friends, and witnesses represents a continuation of  
24 Defendants' negligent conduct and demonstrates their ongoing reckless disregard  
25 for the foreseeable harm their actions would cause to Plaintiff and others.  
26  
27

1           295. In furtherance of their negligent conduct, Defendants actively  
2 participated in media releases and in preparation, including distribution onto  
3 YouTube and various media outlets. Defendants also coordinated the  
4 dissemination of information to publicists as part of their media campaign, further  
5 amplifying the harm caused to Plaintiff through the commercial exploitation of her  
6 private information and that of her associates and witnesses.  
7

8  
9           296. Plaintiff to this day is continuously threatened and has a fear for her life  
10 and for the lives of those she cares about. This ongoing fear and distress is a direct  
11 result of Defendants' negligent conduct.  
12

13  
14           297. Defendants' negligence directly and proximately caused substantial  
15 harm to Plaintiff, financial and business damages, severe emotional distress of  
16 PTSD, primal survival flight/freeze/fight damages, depression, reputational injury,  
17 and costs associated with securing her safety and relocating multiple times.  
18

19           298. Plaintiff respectfully requests that this Court to: a. Enter judgment  
20 against Defendants, jointly and severally, for compensatory damages in an amount  
21 to be determined at trial, but not less than \$2,000,000; b. Award Plaintiff damages  
22 for the costs incurred in securing her safety, including investigations and security  
23 expenses; c. Issue a temporary and permanent injunction prohibiting Defendants  
24  
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1 from continuing their negligent conduct toward Plaintiff; d. Award Plaintiff her  
2 costs and such other relief as the Court deems just and proper.  
3

4 **NINTH CLAIM FOR RELIEF**  
5 **Intentional Infliction of Emotional Distress**

6 299. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
7 Complaint and incorporates the same by reference as if repeated herein in their  
8 entirety.  
9

10 300. Defendants engaged in extreme and outrageous conduct that exceeds all  
11 bounds of decency tolerated in a civilized society. Defendant Barresi's conduct  
12 involved systematically isolating her from friends and professional relationships,  
13 tracking and disseminating her whereabouts across multiple states and countries,  
14 and conducting his stalking and harassment through hundreds of emails, texts,  
15 calls, and posts over multiple years. This conduct was designed to create maximum  
16 psychological damage by exploiting Plaintiff's deepest traumas - her mother's death  
17 and her care for vulnerable friends - while forcing her into social isolation and  
18 geographic displacement to escape the relentless harassment that targeted not just  
19 her but everyone she cared about.  
20  
21  
22  
23

24 301. Defendant Barresi caused severe emotional distress to Plaintiff by using  
25 her communications with Meador to harm both Meador and Plaintiff. Defendant  
26 Barresi used unconsented recordings of Plaintiff's phone calls with Meador and the  
27

1 communications between Meador and Plaintiff repeatedly to cause Plaintiff PTSD,  
2 depression, and flight, freeze, and fight survival responses. Defendant Barresi sent  
3 text messages between Plaintiff and Meador showing Meador asking for help and  
4 Plaintiff advising Meador to not recant the violence and threats that happened to  
5 her, that for her safety, to change the identity in her worries for Meador. Defendant  
6 Barresi held Meador in a helpless position where Meador needed Plaintiff to  
7 silence herself in order to protect Meador, forcing Plaintiff to choose between her  
8 own safety, rights and Meador's well-being.

12 302. Defendant Barresi, in his outrageous conduct and severely violent  
13 social behavior, compared the pain and suffering of Plaintiff losing her mother by  
14 evacuating early, to the loss, devastation, and demise that Meador was facing from  
15 Defendant Barresi that she was "abandoning" Meador. Defendant not only  
16 emphasized this in intense psychological coercion of Plaintiff in direct  
17 communications with her, but also in his repeated unconsented use and  
18 dissemination of Defendant Barresi's unlawful recording of Plaintiff's father, with  
19 highly traumatizing connections to violence, mortality, guns, and an assailant  
20 killing a musician repeatedly. Defendant Barresi connected the content to a woman  
21 that Plaintiff donated to and wanted to help, to create a continued trauma of  
22 helplessness and twisted roles to Plaintiff unwantingly. Defendant Barresi

1 connected this brutality and cruelty to his traumatization of Meador and Plaintiff  
2 into series of actions including unwanted contact and using the unconsented  
3 recording between Plaintiff and Meador publicly and in emails, obscuring the  
4 private torture he was inflicting onto Meador and Plaintiff.  
5

6 303. Their coordinated campaign involved: a) Repeatedly telling Plaintiff,  
7 family, and her associates with death, violence, and harm, including explicit  
8 statements that she should "burn like [her] mother," "die," have no air, and that her  
9 life "should be a living nightmare"; b) Exploiting Plaintiff's grief by sending her  
10 deceased mother's coroner's report with graphic death imagery, accompanied by  
11 taunting messages suggesting Plaintiff abandoned her mother to die; c) Creating  
12 and distributing unconsented recordings of Plaintiff's private conversations to  
13 cause her distress and to coerce compliance; d) Publishing multiple unconsented  
14 recordings with re-traumatizing content connecting themes of "abandonment,"  
15 "leaving to die," and emails, texts, and headlines containing "I want my mom  
16 back," "final moments," and "let burn to death" to psychologically damage both  
17 Plaintiff and Meador; e) Directing Meador to be "scared to death" and "deathly  
18 afraid" with directing wrongful retaliation to occur as he did to Heard regarding  
19 Plaintiff to sever association and positive communications with Plaintiff; causing  
20 Plaintiff severe primal survival flight/freeze/flight, worry, PTSD, and depression;  
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1 f) Repeatedly to violence and re-traumatization, that people she cares about are  
2 being forced against their will and made to be traumatized; g) Systematically  
3 isolating and disrupting relationships of Plaintiff by harming her friends, family  
4 members, associates, people she cares about, business associates, and witnesses;  
5 and h) Continuously monitoring and publicizing Plaintiff's whereabouts, forcing  
6 her to relocate multiple times, including fleeing the country.  
7  
8

9 304. The complaint includes emotional distress claims under both intentional  
10 and negligent theories. Intentional Infliction of Emotional Distress (IIED) requires  
11 proving the defendants engaged in extreme and outrageous conduct with the intent  
12 to cause severe emotional distress, which the plaintiff actually suffered as a result.  
13  
14 Negligent Infliction of Emotional Distress (NIED) follows a similar pattern but  
15 focuses on negligent rather than intentional conduct that foreseeably caused severe  
16 emotional harm.  
17  
18

19 305. Defendants acted with the deliberate intention of causing Plaintiff  
20 severe emotional distress or, at minimum, with reckless disregard of the high  
21 probability that such distress would result from their actions. Defendant Barresi  
22 explicitly stated to Plaintiff that his actions were designed to cause her emotional  
23 suffering.  
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1           306. Defendant Waldman knew of the extreme nature of Defendant Barresi's  
2 tactics through direct communication, yet continued to acquiesce, perceivably  
3 direct, and reward these actions, demonstrating his own intentional participation in  
4 inflicting emotional distress upon Plaintiff.  
5

6           307. As a direct and proximate result of Defendants' extreme and outrageous  
7 conduct, Plaintiff has suffered severe emotional distress, including: a) Persistent  
8 anxiety, fear, and hypervigilance manifesting in fight-or-flight responses; Post  
9 Traumatic Stress Disorder (PTSD); Crying from Plaintiff and severe depression;  
10 Profound grief and trauma from repeated exploitation of her mother's death,  
11 friends, and associates; Deteriorating physical health, including weight loss  
12 exacerbated by prolonged stress; Social isolation resulting from Defendants'  
13 intimidation of her associates and witnesses; Inability to maintain professional  
14 relationships and career opportunities; and Ongoing psychological trauma  
15 requiring relocation from her home and country.  
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18           308. The severity of Plaintiff's emotional distress is evidenced by its  
19 substantial impact on her daily functioning, including her inability to maintain  
20 residence, employment, and educational pursuits.  
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23           309. California courts recognize conduct involving repeated coercion,  
24 threats, and exploitation as sufficiently extreme to support an IIED claim. In  
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1 *Hughes v. Pair*, 46 Cal. 4th 1035, 1051 (2009), the California Supreme Court  
2 defined "outrageous" conduct as that which exceeds "all bounds of that usually  
3 tolerated in a civilized society." Defendants' actions clearly meet this standard.  
4

5 310. Plaintiff respectfully requests this Court: a) award compensatory  
6 damages in an amount to be proven at trial, currently estimated in excess of  
7 \$2,000,000; b) award punitive damages sufficient to punish Defendants for their  
8 malicious conduct and deter similar future behavior; c) issue preliminary and  
9 permanent injunctions prohibiting Defendants from continuing their harassing and  
10 intimidating behaviors; and d) grant such other relief as the Court deems just and  
11 proper.  
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14

15 **TENTH CLAIM FOR RELIEF**  
16 **Negligent Infliction of Emotional Distress**

17 311. Plaintiff hereby re-alleges and incorporates by reference all paragraphs  
18 contained in the foregoing Complaint as though fully set forth herein.  
19

20 312. Negligent Infliction of Emotional Distress (NIED) is a tort claim where  
21 a plaintiff seeks damages for emotional suffering caused by a defendant's negligent  
22 conduct. Unlike Intentional Infliction of Emotional Distress, NIED focuses on the  
23 defendant's failure to exercise reasonable care rather than requiring outrageous or  
24 intentional conduct.  
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1 313. Defendants are liable for Negligent Infliction of Emotional Distress  
2 because they breached their duty of care to Plaintiff, causing her to suffer  
3 significant emotional harm through their negligent conduct, including continuously  
4 depriving Plaintiff's rights, rights of association, and conducting invasion of  
5 privacy, intrusion into her private affairs and conversations, intrusion into  
6 seclusion, unauthorized use of voice/name/likeness, stalking, civil harassment,  
7 civil conspiracy, and negligence that placed her in reasonable fear for her safety.  
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10 314. Defendants' pattern of harmful conduct toward Plaintiff began in 2022,  
11 and has continued unabated through the present for approximately 3 years, 2023,  
12 2024, and 2025, creating a prolonged period of emotional suffering. Defendants'  
13 actions have included, but are not limited to: exploiting unconsented recordings of  
14 phone calls, sending threatening communications referencing Plaintiff's deceased  
15 mother, forcing Plaintiff's associates to fear retaliation and impugment to the  
16 point of 'scared to death' causing Plaintiff severe emotional distress, tracking and  
17 publicizing Plaintiff's location, and taking away Plaintiff's fundamental rights to  
18 freedom of association, speech, assembly, property, and travel.  
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23 315. Defendants knew or should have known their actions would cause  
24 severe emotional distress to Plaintiff, as evidenced by their deliberate exploitation  
25 of sensitive personal information, including Plaintiff's relationship with her  
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1 deceased mother, their calculated references to violence and death, and their  
2 persistent tracking of Plaintiff's whereabouts. Defendants demonstrated awareness  
3 that their conduct would cause distress by timing communications to coincide with  
4 emotionally significant dates and with vulnerabilities known by Defendant Barresi  
5 of Plaintiff's trauma and care for others, targeting Plaintiff's family members and  
6 close associates, and repeatedly accessing and distributing private information that  
7 could only have been obtained through invasive means.  
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11 316. Defendants' negligent conduct to create distress in Plaintiff that's  
12 foreseeable, has extended to targeting Plaintiff's friends, family members, and  
13 associates, creating additional emotional distress for Plaintiff who feared for the  
14 safety and wellbeing of those she cared about. This included stalking that caused  
15 Plaintiff to miss associates and lose associates, deliberately isolating her from  
16 support networks, and using manipulated recordings to damage her relationships.  
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19 317. Defendants negligently enabled one another throughout this period,  
20 despite being fully aware of the harmful conduct. This is evidenced by their  
21 continued coordination and mutual reinforcement of harmful activities directed at  
22 Plaintiff, including but not limited to one Defendant rewarding the other for  
23 harmful conduct and acknowledging awareness of the distress being caused while  
24 taking no steps to mitigate it.  
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1 318. Defendants' conduct was undertaken with negligent disregard for  
2 Plaintiff's physical safety and emotional wellbeing, as demonstrated by their  
3 relentless unauthorized disclosures, persistent communications containing graphic  
4 imagery, death references, and implications of violence, which a reasonable person  
5 would recognize as likely to cause severe emotional distress. Defendants continued  
6 this behavior despite receiving direct communications from Plaintiff and others  
7 informing them of the distress their actions were causing.

8 319. As a direct and proximate result of Defendants' negligence, Plaintiff has  
9 suffered severe emotional distress manifested by: a. Plaintiff's participation in her  
10 career and contracts suffered, and Plaintiff withdrew from her education; b.  
11 deterioration of her health, especially when Plaintiff is closer in proximity to being  
12 under Defendants' influence, and when loved ones, friends, associates, and family  
13 are being harmed by Defendants to Plaintiff's awareness; c. experiencing severe  
14 Post-Traumatic Stress Disorder (PTSD), depression, and significant physical  
15 weight loss; d. experiencing fight-or-flight responses, hyperarousal, and acute  
16 stress reactions commonly experienced by victims of misconduct; e. being forced  
17 to relocate to Hawaii and later to multiple international locations to escape the  
18 ongoing misconduct; f. financial losses due to inability to pursue business  
19 opportunities and contracts, particularly in California where Defendants' influence

1 created an unsafe environment; and g. social isolation resulting from Defendants'  
2 deliberate efforts to damage Plaintiff's relationships and professional connections.  
3

4 320. Under California law, Defendants had a duty to exercise reasonable  
5 care toward Plaintiff. They breached this duty through their negligent conduct,  
6 causing foreseeable and severe emotional distress to Plaintiff.  
7

8 321. Plaintiff respectfully requests that this Court to: Hold Defendants  
9 jointly and severally liable for compensatory damages in an amount to be  
10 determined at trial or amounts to \$2,000,000; Issue an injunction preventing  
11 Defendants from continuing their negligent conduct that has caused and continues  
12 to cause Plaintiff severe emotional distress; and Grant such other and further relief  
13 as this Court deems just and proper.  
14  
15

16 **ELEVENTH CLAIM FOR RELIEF**  
17 **Violation of the Racketeer Influenced and Corrupt Organizations Act**  
18 **(RICO), 18 U.S.C. §§ 1961–1962**

19 323. Plaintiff hereby re-alleges all paragraphs contained in the foregoing  
20 Complaint and incorporates the same by reference as though fully set forth herein.  
21

22 324. At the core of this RICO enterprise lies a sinister psychological  
23 manipulation scheme. Defendant Barresi, originally from the Northeast States and  
24 New Jersey/New York, as well as trained by Anthony Pellicano, and Defendants  
25 employ a series of tactics for the main purpose of removing the ability of their  
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27

1 victims to rationalize the identity of attackers through their psychologically  
2 coercive impact. Through repeated contact, coordination, pressuring, and  
3 falsifications, clarity and normalcy are systematically stripped from their victims,  
4 who become forced to accept the Defendants' manufactured reality through  
5 psychological conditioning. The repetition of tactics designed to re-direct focus to  
6 Defendant Barresi and participants and to create psychologically unknown  
7 assailants and attackers effectively serves the Defendants' goals of taking away  
8 their victims' autonomy for Defendants' ill gains. By preventing victims and  
9 witnesses from identifying and naming their actual attackers accurately, the  
10 Defendants create a state of profound confusion and vulnerability. This deliberate  
11 misdirection causes victims, their personnel, their families, and their associates to  
12 wrongfully fear individuals who were not the actual perpetrators, thereby  
13 redirecting attention away from the true attackers. This strategy serves as a central  
14 mechanism by which they maintain control over their victims and witnesses,  
15 preventing them from seeking appropriate legal remedies or protection against the  
16 actual responsible parties.

23 325. The Racketeer Influenced and Corrupt Organizations (RICO) Act  
24 prohibits conducting an enterprise through a pattern of racketeering activity. A  
25 "pattern of racketeering activity" requires at least two predicate acts from a list of  
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27

1 federal and state crimes, occurring within a ten-year period. Applicable predicate  
2 acts in this case include: 18 U.S.C. § 1512(b)(1) and (2) - Witness, Victim, and  
3 Informant Tampering, which prohibits using intimidation, threats, or corrupt  
4 persuasion to influence testimony or cause someone to withhold evidence; 18  
5 U.S.C. § 1519 - Destruction, Alteration, or Falsification of Records, which  
6 prohibits intentionally altering, destroying, or creating false records with the intent  
7 to impede or influence federal investigations; 18 U.S.C. § 1503 - Obstruction of  
8 Justice, which prohibits corrupt actions intended to interfere with the  
9 administration of justice, including intimidating witnesses and victims; 18 U.S.C. §  
10 2511 - Federal Wire-Tapping Law, which prohibits the interception of wire, oral,  
11 or electronic communications, particularly when such recordings are used for  
12 extortion and coercive purposes; 18 U.S.C. § 875 - Interstate Threats, which  
13 prohibits transmitting threats to injure another person across state lines; California  
14 Penal Code § 136.1 - Dissuading a Witness or Victim, which prohibits knowingly  
15 and maliciously preventing or dissuading any witness or victim from attending or  
16 giving testimony at any trial, proceeding, or inquiry authorized by law, or from  
17 reporting a crime to law enforcement; California Penal Code § 141 - Planting or  
18 Tampering with Evidence, which prohibits planting or tampering with evidence to  
19 falsely implicate someone of a crime; California Penal Code § 632 –  
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1 Eavesdropping and Recording Law, which prohibits intentionally recording  
2 confidential communications without the consent of all parties to the  
3 communication. California is a "two-party consent" state, requiring consent from  
4 all parties for legal recording; and California Penal Code § 646.9 - Criminal  
5 Harassment/Stalking, which prohibits willfully, maliciously, and repeatedly  
6 following or harassing another person and making a credible threat with the intent  
7 to place that person in reasonable fear for their safety. 18 U.S.C. § 873 -  
8 Blackmail, which prohibits demanding or receiving money or valuable  
9 consideration under threat of informing against any violation of federal law; 18  
10 U.S.C. § 876 - Mailing Threatening Communications, which prohibits sending  
11 communications containing threats to injure the person, property, or reputation of  
12 the addressee or another; California Penal Code § 519 - Threats Constituting  
13 Extortion, which specifies that fear essential to extortion may be induced by threats  
14 to expose disgrace, secrets, or damage reputation.

15  
16 326. Defendants Waldman and Barresi have violated RICO by conducting  
17 and participating in an enterprise engaged in a pattern of racketeering activity  
18 affecting interstate commerce. This enterprise operates as a coordinated effort  
19 through intimidation, witness tampering, obstruction of justice, and exploitation of  
20 victims.

1           **327. The Enterprise:**

2           a. The enterprise consists of Defendants Barresi, Does, and Waldman acting  
3  
4 in concert for their interests through illicit and illegal means.

5           b. The enterprise has a distinct structure, with Defendant Barresi, primarily  
6 directing operations as the active Defendant who executes intimidation tactics and  
7 controls day-to-day operations. In crossovers of Defendant Barresi's goals,  
8 Defendant Barresi utilizes methods to harm assault victims and witnesses of  
9 additional interest to “sell” their cases to individuals interested in silencing that  
10 victim or witness. Personnel and individuals participating get involved to be  
11 directed by Defendant Barresi to isolate, control, and disrupt communications of  
12 support, as well as to attack and impugn his victims and targets. Defendant  
13 Waldman, a lobbyist residing on the East Coast, provided more distant direction  
14 and oversight to Defendant Barresi, encouraging his deranged activities by  
15 affirming that he was accomplishing their goals, despite the significant financial  
16 hemorrhaging these activities caused to all sides of disputes. Victims of Defendant  
17 Barresi would want safety from Waldman, who would not effectively provide it.  
18 Barresi's dominating role in the enterprise included his direct engagement in  
19 obscuring, redirecting, and controlling narratives, not only in media outlets that  
20 paid him, but also in narratives involving criminal and civil cases and  
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1 investigations. Together, they systematically worked to force individuals to comply  
2 with their preferences through methods that violate both federal and state laws.  
3

4 c. This structure has existed for years before Plaintiff, specifically  
5 approximately 3 years this structure has victimized Plaintiff, her associates, her  
6 friends, and her family, and continues to operate, demonstrating sufficient  
7 longevity to pursue its criminal purpose.  
8

9  
10 **328. Pattern of Racketeering Activity:**

11 a. Witness, Victim, and Informant Tampering (18 U.S.C. § 1512(b)(1)  
12 and (2) and California Penal Code § 136.1):  
13

14 Defendants have systematically engaged in a pattern of witness tampering  
15 through intimidation, threats, and coercive tactics. Defendant Barresi has admitted  
16 to creating "mile-long lists" of witnesses to silence. The Defendants have  
17 deliberately targeted individuals with knowledge of damaging information,  
18 employing tactics designed to prevent their testimony or cooperation with  
19 authorities. These actions constitute both federal witness tampering under 18  
20 U.S.C. § 1512 and dissuading a witness under California Penal Code § 136.1,  
21 which is a "wobbler" offense that can be charged as either a misdemeanor or  
22 felony.  
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1           b. Destruction, Alteration, or Falsification of Records (18 U.S.C. § 1519 and  
2 California Penal Code § 141): Defendants have engaged in a systematic pattern of  
3 altering, destroying, and falsifying records to impede investigations and damage  
4 witnesses and victims. Specifically, Defendant Barresi has altered audio recordings  
5 to create false narratives, including editing a recording of James Conner to  
6 manufacture threats of violence and attackers from the wrong figures, in order for  
7 Defendant Barresi to control his victims. Additionally, Defendant Barresi altered  
8 recordings of phone calls to make them appear more violent and coercive, with the  
9 specific intent to psychologically damage and intimidate both the individuals  
10 contained in the recordings and those who would hear them. These actions  
11 constitute violations of both federal law under 18 U.S.C. § 1519 and California  
12 state law under Penal Code § 141  
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18           c. Illegal Eavesdropping and Recording (California Penal Code § 632):  
19 Defendant Barresi has systematically violated California's eavesdropping laws by  
20 recording confidential communications without the consent of all parties.  
21 Specifically, Barresi misrepresented his ability to legally record individuals,  
22 claiming he could do so with a New Jersey area code while purposefully residing  
23 in California. This deception was employed to circumvent California's two-party  
24 consent law, which requires all parties to consent to the recording of confidential  
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1 communications. Defendant Barresi exploited Plaintiff's unconsented recorded  
2 phone call with Angela Meador, while Plaintiff recorded in California which  
3  
4 outlaws Defendant from disclosing the unconsented recorded phone call, and also  
5 recorded Plaintiff's father's phone call without consent while Defendant was in  
6 California. These recordings were then used as tools for coercion and threats  
7  
8 against the victims, violating Penal Code § 632, which can be prosecuted as either  
9  
10 a misdemeanor or a felony and carries penalties including imprisonment up to  
11 three years and fines.

12 329. California Penal Code § 646.9 - Criminal Harassment/Stalking, which  
13 prohibits willfully, maliciously, and repeatedly following or harassing another  
14 person and making a credible threat with the intent to place that person in  
15 reasonable fear for their safety. The repeated stalking and harassment from  
16 Defendant Barresi and Defendants was employed as a control mechanism to  
17 prevent victims and Plaintiff from correctly identifying the actual perpetrators of  
18 legitimate danger while simultaneously manufacturing false perceptions of danger  
19 from Plaintiff, supporters, personnel, and individuals in disputes against victims.  
20  
21 This deliberate confusion about the source of danger created an environment where  
22 victims were unable to seek appropriate protection from actual threats while being  
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1 misdirected to fear innocent parties, furthering the Defendants' objectives of  
2 psychological manipulation and control.  
3

4       330. Blackmail and Extortion (18 U.S.C. § 873, 18 U.S.C. § 876, and  
5 California Penal Code § 519): Defendants have systematically engaged in  
6 blackmail by leveraging illegally obtained and manipulated recordings to extract  
7 compliance and silence from victims. Defendant Barresi specifically employed  
8 threats to expose embarrassing or damaging information—often falsified or  
9 deceptively edited—unless victims complied with demands to remain silent about  
10 the true identities of their attackers or to redirect their attention away from the  
11 actual perpetrators. These communications crossed state lines, constituting federal  
12 blackmail violations. Additionally, the Defendants induced fear through threats to  
13 damage reputation, business relationships, and community standing of Plaintiff and  
14 other victims, satisfying California's laws regarding threats. Through these  
15 schemes, Defendants obtained both tangible benefits and the intangible but  
16 valuable property rights of forced silence and compliance, enabling the  
17 continuation of their enterprise. The use of manipulated recordings and falsified  
18 evidence as instruments of these schemes demonstrates the calculated nature of the  
19 Defendants' criminal activity and its central role in achieving the enterprise's  
20 purposes of psychological control and misdirection.  
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1           331. Criminal Psychological Manipulation Through Combined Illegal  
2 Activities: Through the combined effect of witness tampering, falsification of  
3 records, and illegal recordings, Defendants created a psychologically coercive  
4 environment designed to force victims and witnesses to recant testimony or  
5 withhold information about the identities of attackers and principals of misconduct.  
6 Specifically, by utilizing altered recordings obtained through illegal means,  
7 Defendants instilled fear in Plaintiff, victims and witnesses that created primal  
8 survival reactions, compelling them to comply with Defendant Barresi's demands.  
9 This systematic approach to psychological manipulation constitutes a distinct  
10 pattern of racketeering activity aimed at obstructing justice and protecting the  
11 Defendants' interests.

12           332. Continuity and Relationship: The predicate acts show both "horizontal  
13 relatedness" (similar participants, victims, and methods) and "vertical relatedness"  
14 (furthering the enterprise's common purpose). As established in *H.J. Inc. v.*  
15 *Northwestern Bell Tel. Co.*, 492 U.S. 229 (1989), the activities demonstrate a  
16 pattern with sufficient continuity and relationship, as:

17           a. The acts occurred regularly over at least two years, continuing to the  
18 present;

19           b. The same participants (Defendants Barresi, Does, and Waldman) engaged  
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1 in these acts;

2 c. Similar victims (witnesses, family, associates, friends, Meador, and  
3 Plaintiff) were targeted;  
4

5 d. Similar methods were consistently perpetrated across victims and  
6 incidents, including: (1) intimidation through direct and indirect threats; (2)  
7 exploitation of illegally obtained recordings to create psychological  
8 pressure; (3) systematic interference with victims and personnel to redirect  
9 their own lived experiences, replacing authentic perception with  
10 manufactured objects and narratives that obscured the truth; (4) blackmail  
11 using threats to expose embarrassing or damaging information; (5) deliberate  
12 misdirection about the identity of actual attackers and threats; (6) isolation  
13 tactics to separate victims from support networks; (7) coordinated  
14 harassment campaigns across multiple communication channels; (8)  
15 reputation damage through strategic release of manipulated information; (9)  
16 creation of psychological conditions of confusion and vulnerability; and (10)  
17 exploitation of victims' legitimate safety concerns to further control them;  
18 and  
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25 e. All acts shared the common purpose of silencing opposition to the  
26 Defendants' interests.  
27

1           333. Specific Training and Methodology: Barresi has been highly trained by  
2 Anthony Pellicano (convicted 110 times by federal authorities) in methods of  
3 witness intimidation, illegal surveillance, and evidence tampering. This training  
4 provided Barresi with sophisticated techniques for intimidating witnesses and  
5 falsifying evidence, which he has employed in service of the enterprise. Defendant  
6 Barresi's background and specialized training demonstrate the premeditated and  
7 professional nature of the criminal activities undertaken by the enterprise.  
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11           334. Financial Sabotage Through Racketeering Activities: Through their  
12 pattern of racketeering activities, Defendants have engaged in deliberate financial  
13 sabotage of Plaintiff's businesses and professional endeavors. This sabotage has  
14 included: a. forcing Plaintiff to expend substantial financial resources to pay  
15 personnel attempting to remedy the situation without assistance; b. financially  
16 sabotaging businesses that would rival and intend to rival Defendant Barresi and  
17 Defendants, including Plaintiff's businesses and partnerships in public safety and  
18 investigations, and those assisting legal cases of clients; c. damaging Plaintiff's  
19 career opportunities in film, music, and arts due to Defendant Barresi's deranged  
20 engagements in entertainment; and d. creating conditions requiring Plaintiff to  
21 relocate multiple times to escape these illicit activities;  
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1 335. Interstate Commerce Impact: The enterprise affects interstate  
2 commerce as required by RICO through:  
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4 a. The enterprise substantially impacts interstate commerce as required  
5 under RICO statutes because Plaintiff and victims connected to the  
6 Plaintiff—including friends, family members, associates, and victims-  
7 witnesses to assaults and other crimes—reside across state lines from  
8 Defendant Barresi and other Defendants, yet continue to experience harmful  
9 impact from the Defendants' activities. This geographic distribution of  
10 victims across multiple states satisfies RICO's interstate commerce  
11 requirement as established in *United States v. Robertson* (514 U.S. 669,  
12 1995), where the Supreme Court held that activities affecting interstate  
13 commerce, even minimally, are sufficient to trigger RICO jurisdiction.  
14 Additionally, the cross-border nature of these victim impacts aligns with  
15 precedent in *Musick v. Burke* (913 F.2d 1390, 9th Cir. 1990), which  
16 confirmed that victimization occurring across state boundaries constitutes a  
17 clear nexus to interstate commerce under RICO's jurisdictional  
18 requirements. b. Travel between states to conduct the enterprise's activities;  
19 c. Interference with businesses operating in interstate commerce, particularly  
20 disrupting crucial rescue and safety initiatives within the Arts industry where  
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1 Plaintiff was actively collaborating to establish more accurate and clear  
2 communications channels, proper personnel training, and assistance  
3 protocols designed to protect vulnerable individuals; Defendant Barresi  
4 specifically targeted and systematically obstructed these interstate  
5 collaborative safety efforts by disseminating false information to  
6 participating organizations and personnel, intimidating potential safety  
7 partners, and corrupting communication channels that were essential for  
8 cross-state coordination of these protective services, thereby directly  
9 impeding legitimate interstate business operations aimed at improving  
10 industry safety standards;

11 d. Obstruction of justice in federal investigations spanning multiple states,  
12 resulting in devastating consequences for the individuals involved who were  
13 systematically denied relief and protection due to Defendants' deliberate  
14 actions; these obstructions significantly increased financial and personal  
15 costs for Plaintiff and victims as they were forced to pursue multiple legal  
16 avenues across jurisdictions, endure prolonged exposure to harmful  
17 conditions without intervention, and absorb substantial economic burdens  
18 from legal fees, personnel fees, relocation expenses, lost contracts, and lost  
19 business—all directly attributable to Defendants' calculated interference  
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1 with federal investigative processes designed to provide justice and  
2 protection across state boundaries.

3  
4 336. Injury to Business or Property: Plaintiff has suffered concrete financial  
5 injury to her business and property as required by RICO:

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7 a. (1) Plaintiff had been seen by several individuals in the Arts/entertainment  
8 industry as someone who worked and could work for them, assist them, and  
9 improve their outcomes for years, as in 2019, 2021, 2023, and the Present;  
10  
11 However, Defendants' attacks made individuals cautious to work with  
12 Plaintiff without having to use other intermediary parties, which  
13 significantly increased costs and rendered many opportunities nearly  
14 impossible to pursue. For example, (1) Plaintiff was given the opportunity to  
15 produce for a film director with Female Filmmakers Fuse for a victim of  
16 Defendants', but instead these funds (\$25,000+) were forcibly redirected into  
17 personnel who were re-interviewing, investigating, and attempting to  
18 prepare her case against Defendants;  
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21  
22 b. Loss of contract with SaveMeNow (5% of sales), which became  
23 impossible to fulfill due to Defendants' interference. These contracts in  
24 public safety are valued in hundreds of thousands to millions—for instance,  
25 SaveMeNow with Worldie Ltd applied with partners to Melinda Gates Grant  
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1 "Equality Can't Wait Challenge" through Pivotal Ventures, worth \$100,000  
2 to \$10,000,000 in 2020. While Plaintiff and SaveMeNow languished, a  
3 competing SaveMe business was released in 2024 in France and had a press  
4 release in the South of France and Monaco. Plaintiff could not effectively  
5 promote, advocate, or communicate while under Defendant Barresi's attacks.  
6 It created an aura of caution as individuals feared being impugned, harassed,  
7 and reputationally maimed;  
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11 c. Lost contracts and opportunities from TurnKeyCapital. Removal from the  
12 board of Aedan (now TurnKeyCapital), preventing Plaintiff from benefiting  
13 from the company's growth in value. The removal from the board occurred  
14 at the initiation of increased attacks by Defendant Barresi in 2022, and this  
15 continued over the years. The repeated illicit activities from Defendants  
16 created a constant caution for businesses to work with Plaintiff, severely  
17 limiting her professional opportunities and economic advancement. Again in  
18 2024, Plaintiff was provided an additional position available with the  
19 contract worth 100,000 pieces of stocks with a value of \$250,000 at the time  
20 if she'd work for at least 3 months in 2024 on projects. In 2018, this business  
21 was valued to potentially reach \$600 million in the future and Plaintiff  
22 worked for the Chairman at the time in 2019. This business is now worth  
23  
24  
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27

1 over \$200 million and the future value is projected to be in the billions.

2 d. Over \$200,000 spent on private investigations and security to counter  
3 Defendants' actions; as Defendants were harming her family, friends,  
4 associates, and witnesses, including vulnerable victims of assaults and  
5 crimes, especially when related to the entertainment industry;  
6  
7

8 e. Forced relocation expenses, including moving to Hawaii and France to  
9 escape Defendants' activities; This relocation for Plaintiff's safety made her  
10 unable to realize contracts and professional relationships that started when  
11 she was in California.  
12

13 f. Damage extended to Worldie Ltd and Rescue Social Inc, which have had  
14 to keep their online websites hidden, conceal partners and representatives,  
15 and lost a director of Worldie Ltd during Defendants' illicit activities that  
16 impacted their safety. This resulted in costs and lost revenue of tens of  
17 thousands of dollars in product development and potential sales. Defendant  
18 Barresi purposefully, over the years, continued to force Plaintiff, her family,  
19 and her associates into crimes he was committing and obscuring, which  
20 made potential and current business partners unable to remedy the situation.  
21

22 Worldie Ltd had over 14 partners before Defendant Barresi's actions, and  
23 now has none which are active except with the University which was a  
24  
25  
26  
27

1 hidden contract; and

2 g. Lost business opportunities, as Plaintiff was unable to pursue contracts for  
3  
4 SaveMeNow with NGA911 and EaglePoint Federal Funding due to  
5 Defendants' actions.

6  
7 337. The activities of this enterprise are continuous and ongoing, with  
8 specific knowledge by Defendants of their participation in it. Defendant Barresi  
9 has unconsented recordings of Defendant Waldman and documentation that  
10  
11 Waldman directed him. Their actions have caused Plaintiff significant financial  
12 and emotional harm by preventing Plaintiff and other victims, particularly Angela  
13 Meador, from being able to rationalize and clearly identify their attackers, thereby  
14  
15 perpetuating a cycle of victimization and preventing proper legal remedies.

16  
17 338. Plaintiff requests this Court award treble damages under 18 U.S.C. §  
18 1964(c), injunctive relief to prevent further racketeering activities, costs of suit,  
19 reasonable attorney's fees, and such other relief as the Court deems appropriate.  
20

21  
22 **DAMAGES**

23  
24 339. As a direct and proximate result of Defendants' wrongful actions as  
25 detailed in the foregoing Claims for Relief, Plaintiff has suffered substantial  
26 damages, including but not limited to:  
27

1 Severe Emotional Distress: Plaintiff has endured profound psychological trauma  
2 manifested through persistent anxiety, fear, hypervigilance, and fight-or-flight  
3 responses. This emotional suffering has been deliberately inflicted through  
4 Defendants' pattern of harassment, threats, intimidation, and exploitation of private  
5 information, particularly regarding her associates who she cares about, Plaintiff's  
6 unconsented recording of the phone call with Meador, Plaintiff's deceased mother  
7 Victoria, her family who have been recorded and threatened, her associates, people  
8 she cares about, and her friends. Plaintiff has suffered significant PTSD and  
9 depression. Removing rights of association, speech, privacy, and even where she  
10 can travel, has been particularly distressing and constant.

15 340. Physical Health Deterioration: Plaintiff's emotional distress has  
16 manifested in physical symptoms, including physiological hyperarousal  
17 flight/freeze/fight repeatedly with severity, significant weight loss exacerbated by  
18 prolonged stress from Defendants' ongoing campaign of illicit violations.

21 341. Economic Damages: Plaintiff has incurred substantial financial losses,  
22 including: costs associated with multiple relocations, including leaving California  
23 for Hawaii and ultimately leaving the United States altogether for France; expenses  
24 for private investigators and enhanced security measures necessary to protect  
25 herself and witnesses; loss of business opportunities, including board positions and  
26

1 contracts; damage to Worldie Ltd and Rescue Social Inc with over ten dissolved  
2 partnerships and a director resigning; professional relationship disruptions with  
3 SaveMeNow and Aedan (now TurnKeyCapital); Educational setbacks, including  
4 withdrawal from her Master's in eBusiness program at American University;  
5 privacy violations in that Plaintiff has suffered harm from Defendants' repeated  
6 invasions of privacy, including unauthorized recording, editing and dissemination  
7 of private conversations;  
8 systematic monitoring of Plaintiff's whereabouts, communications, and  
9 relationships; and public disclosure of Plaintiff's changing locations and personal  
10 information

11 342. Isolation and Social Harm: Defendants' campaign has effectively  
12 isolated Plaintiff by targeting her family members, friends, business associates, and  
13 witnesses, causing irreparable damage to personal and professional relationships;  
14 Defendants deprived Plaintiff of rights to association, speech, public safety  
15 reporting, travel, process serving, re-interviewing, and equal protection. This  
16 caused significant damages socially and to her constitutionally protected rights.

17 343. Reputational Damage: Plaintiff has suffered harm to her professional  
18 reputation in the arts and public safety sectors due to Defendants' dissemination of  
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1 false information and exploitation of her name, voice, and likeness.  
2  
3

4 **PRAYER FOR RELIEF**

5 344. WHEREFORE, Plaintiff respectfully requests that this Court to:

6 Plaintiff respectfully requests that this Court:  
7

8 345. Enter judgment against Defendants, jointly and severally, for all causes  
9 of action alleged in this Complaint; Award compensatory damages in an amount to  
10 be determined at trial, but not less than \$2,000,000, for the economic and non-  
11 economic losses suffered by Plaintiff as a result of Defendants' unlawful conduct;  
12  
13 b. Award statutory, compensatory, and treble damages as provided under  
14 applicable laws, including but not limited to; California Civil Code § 52.1 (Tom  
15 Bane Civil Rights Act); Intrusion into Private Affairs and Conversations (Invasion  
16 of Privacy); California Civil Code § 3344 (Unauthorized Use of Name, Voice, or  
17 Likeness); Civil Harassment (Cal. Code of Civ. Proc. § 527.6); Stalking (Cal. Civ.  
18 Code §1708.7); Civil Conspiracy; Negligence; Intentional Infliction of Emotional  
19 Distress; Negligent Infliction of Emotional Distress; Civil Racketeering 18 U.S.C.  
20 §§ 1961–1962;  
21  
22  
23  
24

25 346. Enter judgment against Defendants for violation of California Penal  
26 Code §§ 632 and 637.2 (Unauthorized Disclosures of Unconsented Recording(s));  
27



1 b. Award statutory damages of the greater of \$5,000 or three times actual damages  
2 for each documented violation, totaling no less than \$80,000 for the at least sixteen  
3 documented instances of unauthorized disclosure; c. Award punitive damages in an  
4 amount sufficient to punish Defendants for their willful and knowing violations  
5 and to deter similar future conduct;  
6  
7

8 347. c. Issue a permanent injunction requiring Defendants to:

9 • Immediately cease all use, distribution, or dissemination of the  
10 unauthorized recording; Remove all copies of the recording from all platforms,  
11 websites, and media channels; Destroy all copies of the recording in their  
12 possession or control; Refrain from any future unauthorized recording or  
13 disclosure of Plaintiff's private communications e. Award reasonable attorney's  
14 fees and costs as provided by Penal Code § 637.2; f. Award compensatory  
15 damages for all harm caused by the unauthorized disclosures; and g. Grant such  
16 other and further relief as this Court deems just and proper.  
17  
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19  
20

21 This claim is brought within the three-year statute of limitations under  
22 California Code of Civil Procedure § 338(a), with the most recent violations  
23 occurring in December 2024 and ongoing harm continuing through the  
24 present.  
25


26 d. Award treble damages where permitted by law;  
27

- 1 e. Award punitive damages in an amount sufficient to punish Defendants  
2 for their malicious, oppressive, and fraudulent conduct undertaken in  
3 conscious disregard of Plaintiff's rights, and to deter similar future  
4 conduct;  
5  
6 f. Issue a temporary and permanent injunction prohibiting Defendants from  
7 further violating Plaintiff's rights through threats, intimidation, or  
8 coercion and prohibiting Defendants from harassing, surveilling,  
9 contacting, or otherwise interfering with Plaintiff and those she cares  
10 about, including her family members, mother Victoria Taft, vulnerable  
11 friends, business associates and witnesses;  
12  
13 g. Prohibiting any further use of Plaintiff's name, voice, likeness, or other  
14 personal attributes for any purpose; preventing further invasion of  
15 Plaintiff's privacy; preventing further stalking of Plaintiff; loved ones;  
16  
17 h. Ordering Defendant Barresi to immediately cease and desist from  
18 activities related to Plaintiff and Meador, including but not limited to  
19 creating, distributing, or maintaining the unconsented recording of the  
20 phone call between Meador and Plaintiff and to not create, distribute, or  
21 maintain any other telephone recordings of Meador;  
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- i. Furthermore, Defendant Barresi cannot create, distribute, or maintain videos, photos, or imagery impugning Meador, and in relation to Plaintiff and to immediately cease and desist from creating, distributing, or maintaining any written or audio materials impugning Meador, including but not limited to texts, letters, emails, posts, or unauthorized disclosures; Thereby, restoring freedom of speech and association to Plaintiff;
  - j. Ordering Defendants to cease any form of stalking, unconsented recording, or contact with Plaintiff or her associates, directly or indirectly, about Plaintiff's family members and mother Victoria Taft;
  - k. Order that Defendant Barresi cease his violations of Civil Rights; including First Amendment; equal protection, and public safety reporting; providing relief from coercion for freedom of association;
  - l. Order to cease undue influence on victims and witnesses; restoring communications and process serving, with civil rights considerations;
285. Award reasonable attorney's fees and costs as provided by applicable statutes; and
286. Grant such other and further relief as the Court deems just and proper.
287. Plaintiff demands a trial by jury.

Dated: May 26, 2025

Respectfully submitted,

 /s/ Christina Taft

Plaintiff Christina Taft  
*in Propria Persona*