JOHN DOE, v. DAMIEN VAZQUEZJohn Doe is a professional model and an actor. He has appeared in various shows and has numerous online followers on social media websites, including, but not limited to, Facebook, Twitter, Instagram, Tumblr, and/or Snapchat. Damien Vazquez is active in the entertainment industry. Damien Vazquez owns and/or operates Loud Platinum, which on information and belief, provides custom promotional album plaques. On or about October 2015, Damien Vazquez reached out to John Doe, via Instagram, to initiate a friendship with him. The parties’ friendship started and ensued for several months. During the aforesaid friendship, on or around April 22, 2016, John Doe was invited to stay at Damien Vazquez’s residence, where unbeknownst to John Doe, Damien Vazquez surreptitiously took nude or semi-nude photos of John Doe while he was sleeping. John Doe was not aware of Damien Vazquez’s actions. John Doe did not learn of the taking of the nude or semi-nude photos until Damien Vazquez shared them with John Doe’s friends, colleagues, and/or relatives. On information and belief, Damien Vazquez took the nude or semi-nude photos to feel close to John Doe and to use them for personal gratification or to gain an advantage over him. On or about May 10, 2016, Damien Vazquez texted the nude or semi-nude photos to John Doe and his relatives (e.g., John Doe’s mother) with the threat of dissemination on social media websites and towards third parties. Around the same time, Damien Vazquez took John Doe’s mobile phone without John Doe’s authorization and extracted private pictures and videos that belonged to John Doe. For example, while in attendance at Coachella Valley Music and Arts Festival in Indio, California, Damien Vazquez surreptitiously extracted personal photos from John Doe’s cell phone since they were staying at same rental property. Afterwards, Damien Vazquez made numerous threats of dissemination of the nude or semi-nude photos unless John Doe kept his friendship intact with Damien Vazquez. On or about June 9, 2016, the nude or semi-nude photos were posted on social media websites (e.g., Twitter, Tumbler, Instagram). Moreover, on or about May 10, 2016, the nude or semi-nude photos were texted and emailed towards John Doe and electronically sent to third parties, such as John Doe’s mother, friends, and industry professionals. Therefore, as a result of the above-listed actions, John Doe indicated to Damien Vazquez that he no longer desired to remain friends with Damien Vazquez. However, John Doe’s request to end his friendship with Damien Vazquez did not sit well with Damien Vazquez. As stated herein, Damien Vazquez has failed or refused to leave John Doe alone. Thus far, Damien Vazquez has refused to accept the fact that John Doe does not wish to communicate with him under any circumstances. Nonetheless, due to Damien Vazquez’s insistence to continue the so-called friendship, John Doe gave in and tried to renew his friendship with Damien Vazquez. Their attempt to renew the so-called friendship did not go well, which led to Damien Vazquez’s visit to Los Angeles, California, in order to meet with John Doe and try to restore the friendship. Damien Vazquez has been continuously contacting John Doe, his friends, colleagues, and/or relatives for the past several months in order to disrupt John Doe’s life and business relations. Despite John Doe’s appeals to Damien Vazquez to stop all communications through email, phone calls, and texting, John Doe has received continuous phone calls from “Unknown Caller ID” for several months. In addition, Damien Vazquez has used over 150 aliases to contact John Doe for no legitimate reason. John Doe, by using TrapCall (www.trapcall.com), has successfully captured and logged the unidentified phone calls that were received from the “Unknown Caller ID” and converted them to a known identification and phone number that directly associates with Damien Vazquez. On or about November 21, 2016, the parties negotiated, and ultimately executed a settlement and mutual release agreement (“Settlement Agreement”) in an effort to resolve the issues and avoid litigation. Therein, among other items, the parties agreed to leave each other alone and to never contact each other. However, from the above-listed date until the present time, Damien Vazquez has failed or refused to comply with the terms of the Settlement Agreement. Damien Vazquez continuously checks John Doe’s social media accounts on (e.g., @codysaintnew, @cody\_saintgnuer, @SaintgnueBrasil, @ddiivergent) to determine when, where, how, or why John Doe is working on various business projects. Damien Vazquez’s actions have caused business interruptions. For example, John Doe’s agent was prevented from contacting John Doe by telephone for days, due to Damien Vazquez’s continuous and uninterrupted phone calls, to inform John Doe that he had a feature film movie offer to be shot the next day. John Doe was in a business relationship with MTV Networks and Bravo Models. Damien Vazquez knew about these business relations since Damien Vazquez follows John Doe on social media websites, and as a result, would have seen John Doe’s online postings. In fact, Damien Vazquez sent a message from PlatinumKid44 @gmail.com towards John Doe and threatened to prevent John Doe’s opportunity of getting on the final season of “Teen Wolf” even if it is for two minutes. Damien Vazquez has used the following email addresses to alarm, annoy, or harass John Doe or his immediate family: (1) musicboysitems@aol.com; (2) anotherdmusic@aol.com; (3) RichieRich1444@aol.com; (4) platinumkid44@gmail.com; (5) DollarDameDoller@aol.com; (6) Platinumkid1444@gmail.com; and (7) damedoller@aol.com. Also, Damien Vazquez has used the following telephone numbers to alarm, annoy, or harass John Doe or his immediate family: (1) 917-597-5622; (2) 320-435-6727; (3) 310-435-6727; (4) 818-569-9062; (5) 347-586-5852; (6) 252-517-3289; (7) 484-388-5390; (8) 704-440-0790; (9) 240-776-8586; and (10) 714-408-9384. Damien Vazquez’s continuous and uninterrupted phone calls have rendered John Doe’s cell phone practically unusable for normal business operations. In fact, MTV Networks cancelled its offer to John Doe to appear in a promotional taping of “Teen Wolf” that was to be filmed from November 11-14, 2016, due to the studio’s inability to connect with John Doe through his cell phone since it was always busy and made John Doe appear inaccessible. Damien Vazquez’s actions directly impacted Bravo Models’ desire and ability to line up modeling appointments for John Doe. As such, John Doe was forced to return home in order to address the situation and was compelled to terminate his business relationships with Bravo Models. Based on the foregoing, an actual controversy has arisen, and now exists, between John Doe and Damien Vazquez concerning their respective rights and duties.