RACHEL DEPALMAv. SAMANTHA KERNS, TRACY KORSLUND, LAURINDA KIRK, Rachel Depalma is a domestic abuse survivor who has chosen to devote her career to improving legislation to provide better support for domestic violence victims. To that end, Rachel Depalma founded her nonprofit organization, No Peace No Quiet, in 2021. Her organization additionally connects domestic abuse victims to resources to aid in their recovery. Rachel Depalma developed an online application for domestic survivors to report misconduct or abuse they experience from others on social media, called the Misconduct Ticketing System (“MTS”), which is available on her organization’s website: nopeacenoquiet.org. The MTS is designed to protect the domestic violence survivor community from harmful or fraudulent behavior online. Reporting to the MTS is secure and anonymous. Rachel Depalma has never released personal information or other data submitted to the MTS. Rachel Depalma designed her nonprofit organization, as well as the MTS, to be resources for domestic abuse victims to be able to lean on when going through their extremely difficult and challenging moments in their life. To that end, Rachel Depalma’s reputation, as well as the reputation of her organization and the MTS, is critical to achieving this goal and providing critical resources to domestic abuse survivors. Since November 2021, Rachel Depalma has been the victim of a targeted social media smear campaign, primarily driven by Samantha Kerns, Tracy Korslund, and Laurinda Kirk, that is intended to defame her and her organization in the domestic violence survivor community and to discourage survivors from seeking the resources she provides or otherwise associating with Rachel Depalma. Upon information and belief, Samantha Kerns, Tracy Korslund, and Laurinda Kirk harassment began in October 2021 as a response to misinformation that the Rachel Depalma was responsible for accusing another member of the survivor community of sexual harassment. Rachel Depalma publicly launched the MTS on November 19, 2021 on social media, to encourage survivors to take advantage of the system. Rachel Depalma was fully transparent about what information the MTS collects and how the information is used. Rachel Depalma spoke about the MTS in several videos published to TikTok using the account @loveandjustice5 and @nopeacenoquiet. Samantha Kerns, Tracy Korslund, and Laurinda Kirk have spread false and defamatory information primarily on TikTok and Instagram about the Rachel Depalma’s personal history and the MTS to discourage survivors from associating with Rachel Depalma, her organization, and/or utilizing the MTS. On November 26, 2021, shortly after the MTS was launched and the Samantha Kerns, Tracy Korslund, and Laurinda Kirk harassment began, an unknown individual attempted to hack into the MTS to obtain victims’ personal data. Rachel Depalma’s safeguards were able to detect and stop the hacking attempt, as well as capture the IP address used by the hacker. Rachel Depalma publicly posted the IP address in an attempt to identify the hacker. Upon information and belief, and by her own admission, the IP address associated with the hacker belonged to Defendant Korslund. On November 27, 2021, Defendant Kerns published a video on TikTok using the account @whatdoesitmatter. In the video, Kerns plays part of one of Rachel Depalma’s videos explaining the MTS, and then states that: “if you are a victim of abuse do not interact with that message board in any way, it is not a secured site”; “all of her legal documentation is still pending”; “keep your information safe, she has already posted somebody’s IP address in an effort to intimidate somebody.” Defendant Kerns additionally points out that Rachel Depalma’s video is copyrighted and should not be reproduced without permission and states that: “I did not get your approval to use this in anyway and I wanna see what you are going to do” and tells Rachel Depalma to “stop taking advantage of abuse survivors.” Defendant Kerns’ statements are false, defamatory, and otherwise cast the Rachel Depalma in a false light. Rachel Depalma’s website is secure, her organization has all proper legal accreditation, and she has never publicly posted an IP address of a victim that was submitted to the MTS. Rachel Depalma does not take advantage of abuse survivors in any way. This video was later deleted by either TikTok or Defendant Kerns. On November 29, 2021, Defendant Kerns published another video on TikTok using the account @whatdoesitmatter. Kerns again plays a portion of the Rachel Depalma’s video explaining the MTS. Kerns added text over the video stating “Do NOT trust this website. Nothing is ever anonymous.” Kerns goes on to state that the Rachel Depalma is “one of the most dangerous individuals [Kerns] has ever seen on this app.” This video was later deleted by either TikTok or Defendant Kerns. Defendant Kerns’ statements are false, defamatory, and otherwise cast the Rachel Depalma in a false light. Rachel Depalma’s MTS is an anonymous reporting portal and Rachel Depalma is not in any way dangerous or otherwise maliciously targeting victims of domestic violence. Defendant Kerns has openly encouraged other TikTok users, including the other Samantha Kerns, Tracy Korslund, and Laurinda Kirk, to engage in harassing and defamatory conduct towards Rachel Depalma. On November 27, 2021, Defendant Korslund published a video on TikTok, using the account @narctok\_royalty, entitled “Leaked Data From NoPeaceNoQuiet.org Ticketing System.” The video publishes fake complaints submitted that, upon information and belief, the Samantha Kerns, Tracy Korslund, and Laurinda Kirk submitted to the MTS with the intent to harass the Rachel Depalma. This video is false, defamatory, and otherwise casts the Rachel Depalma in a false light before the public. On November 29, 2021, Defendant Korslund published a video on TikTok to the account @narctok\_royalty, in conjunction with a video posted by Defendant Kerns. Defendant Korslund placed text over the video stating: “When someone else and I had a issue [Rachel Depalma] then used my data/info from her website.” The video is still available on TikTok at the following URL: https://www.tiktok.com/@narctok\_royalty/video/7036127491538472239. Defendant Korslund’s statement on the video is false, defamatory, and otherwise casts the Rachel Depalma in a false light. Rachel Depalma has not released information submitted by Korslund or any other individual through the MTS. On December 3, 2021, Defendant Korslund published a video on TikTok, using the account @narctok\_royalty. Korslund plays a portion of Rachel Depalma’s video explaining the MTS. The video is still available online at the following URL: https://www.tiktok.com/@narctok\_royalty/video/7037588241091988783. In the video, Korslund states: “[the MTS] is not even close to being anonymous, you have to give your info, and this woman doxxed my IP.” Korslund then shows a series of screenshots of and concerning the Rachel Depalma as follows: a. A screenshot of Rachel Depalma’s post regarding the hacker’s IP address. Korslund goes on to state that Rachel Depalma did not design the MTS for victims but for “herself and her own motives” and that Rachel Depalma “is a very dangerous woman.” b. A case summary of Mark Belmessieri v. Rachel DePalma 20CV370750 and later shows page 8 of the amended complaint filed in that case, detailing Belmessieri’s third cause of action for intentional infliction of emotional distress. c. An edited text conversation allegedly between a “Mark” and “Diane” discussing what Samantha Kerns, Tracy Korslund, and Laurinda Kirk believed to be a restraining order against Rachel Depalma. Rachel Depalma has never had a restraining order of any kind issued against her. Defendant Korslund’s video is false, defamatory, and otherwise casts the Rachel Depalma in a false light before the public, intended to convey that the Rachel Depalma is dangerous to domestic violence survivors. Mark Belmessieri v. Rachel DePalma was a personal injury and defamation case brought against Rachel Depalma by her abuser in 2020, which was swiftly dismissed. Rachel Depalma has never had a restraining order of any kind issued against her. The MTS is anonymous, and Rachel Depalma has not released information submitted through that portal. Defendant Korslund reiterates her statement that Rachel Depalma “doxxed” her IP address and has had restraining orders issued against her in a video published to the account @the.silliest.ho on December 4, 2021. A copy of the video is still available online at the following URL: a. https://www.tiktok.com/@the.silliest.ho/video/7037928472706207023?is\_copy\_url=1&is\_from\_webapp=v1&lang=en Defendant Korslund additionally posted a four-part series of videos on TikTok on December 8, 2021, to the @narctock\_royalty account. In the videos, Korslund is allegedly speaking to a sheriff tasked with investigating a complaint filed by the Rachel Depalma. Korslund again reaffirms her claim that Rachel Depalma “doxxed” her IP address and that Rachel Depalma has been giving out misinformation to domestic abuse survivors. Korslund makes the additional assertion that Rachel Depalma took money from abuse survivors. The videos are still available online at the following URLs: a. https://www.tiktok.com/@narctok\_royalty/video/7039475956196871470 b. https://www.tiktok.com/@narctok\_royalty/video/7039489665736412463 c. https://www.tiktok.com/@narctok\_royalty/video/7039517120732106031 d. https://www.tiktok.com/@narctok\_royalty/video/7039529805636734255 On November 30, 2021, Defendant Kirk published a video to the TikTok account @wholesomehealingatl. In the video, Kirk states that Rachel Depalma “doxxed somebody’s IP address, this was somebody that was on her website nopeacenoquiet.org.” Kirk goes on to state that the Rachel Depalma’s website “is not secure…not encrypted, no security for you the user of the website,” that users should use a VPN when visiting the website because “obviously [Rachel Depalma] is not using the data they are getting for good, in fact, they are using it to doxx people on the Internet which is something that [Kirk] is pretty sure is on their request form” and that Rachel Depalma “has been taking money from people.” Kirk ends the video by referring to Rachel Depalma as a “con artist.” On November 30, 2021, Defendant Kirk published an additional video, on the TikTok account @wholesomehealingatl, responding to a viewer’s comment. In the video, Kirk again states that Rachel Depalma “doxxed someone’s IP address” and that using Rachel Depalma’s website would be “unsafe.” On November 30, 2021, Defendant Kirk registered the domain name “noquietnopeace.org” for the purpose of creating harassing and defamatory content about the Rachel Depalma. The website stated that: “all I want to say is that you…do not need an off app misconduct ticketing system to protect you. The owner of that app is abusive and got upset when other abuse survivors asked legitimate questions;” “that ticketing system is not safe. The owner of that organization has doxed people that are members of her site. If she did it to them, she will do it to you.” On the “noquietnopeace.org” website, Defendant Kirk additionally insinuates that Rachel Depalma takes “advantage of abuse survivors and victims on social media.” She created a form on the website that she called a “Smear Campaign Misconduct Ticketing System.” Shortly after creating the “noquietnopeace.org” website, Defendant Kirk admitted to creating the website in TikTok videos published to the @wholesomehealingatl account and for the express purpose of harassing Rachel Depalma. A copy of the video is available at the following URL: https://www.tiktok.com/@reallaurinda/video/7036480475006864686?is\_copy\_url=1&is\_from\_webapp=v1&lang=en. In at least one video, Kirk states that Rachel Depalma is personally accepting donations from individuals through her organization.   All of Defendant Kirk’s statements in her videos and the websites are false, defamatory, and/or otherwise cast the Rachel Depalma in a false light. The Rachel Depalma does not accept money through the MTS or otherwise require payments to be made to her organization, does not release personal information submitted through the MTS, and is not dangerous or otherwise take advantage of domestic violence survivors. On December 9, 2021, Korslund and Kirk participated in a live video session on Instagram discussing the Rachel Depalma. During the live stream, Korslund and Kirk stated that Rachel Depalma has multiple lawsuits against her, Rachel Depalma’s website is not secure, and that “people paid [Rachel Depalma] money to make [the MTS].” Since January 2022, Defendant Kirk deleted the noquietnopeace.org website and has deleted most of her known social media accounts. Defendant Kerns’ TikTok account, @whatdoesitmatter, was deleted either by TikTok or by Kerns herself. Defendant Korslund’s TikTok accounts, @narctok\_royalty, @the.silliest.ho, and @jadalous, are still active. The aforementioned statements published by Samantha Kerns, Tracy Korslund, and Laurinda Kirk were all designed specifically to spread false information about Rachel Depalma, her organization, and the MTS in an effort to destroy Rachel Depalma’s reputation and encourage other domestic violence survivors to distrust Rachel Depalma and the services she provides.   Specifically, Samantha Kerns, Tracy Korslund, and Laurinda Kirk statements attempt to paint Rachel Depalma as someone who will disseminate sensitive personal information about domestic dispute survivors, for no apparent reason, and who will put domestic abuse survivors in a worse position. Samantha Kerns, Tracy Korslund, and Laurinda Kirk false statements are designed to interfere with Rachel Depalma’s personal life and to injuriously affect her in her trade and profession. As a direct and proximate result of Samantha Kerns, Tracy Korslund, and Laurinda Kirk conduct, Rachel Depalma has suffered injury to her reputation, shame, mortification, mental anguish and injury to her feelings. Rachel Depalma has been repeatedly questioned by individuals, both within her organization and outside her organization, about these accusations, which has caused a significant lowering of Rachel Depalma’s reputation within the domestic abuse support community.