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13 **Attorneys for Plaintiffs**

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **COUNTY OF SAN DIEGO**

16 JANE DOE NOS. 1 - 22, inclusive, individuals;

17 Plaintiffs,

18 v.

19 GIRLSDOPORN.COM, a business organization, form
unknown; MICHAEL J. PRATT, an individual;
20 ANDRE GARCIA, an individual; MATTHEW
WOLFE, an individual; BLL MEDIA, INC., a
California corporation; BLL MEDIA HOLDINGS,
21 LLC, a Nevada limited liability company; DOMI
PUBLICATIONS, LLC, a Nevada limited liability
22 company; EG PUBLICATIONS, INC., a California
corporation; MIM MEDIA, LLC, a California limited
23 liability company; BUBBLEGUM FILMS, INC., a
business organization, form unknown; OH WELL
24 MEDIA LIMITED, a business organization, form
unknown; MERRO MEDIA, INC., a California
25 corporation; MERRO MEDIA HOLDINGS, LLC, a
Nevada limited liability company; and ROES 1 - 550,
26 inclusive,

27 Defendants.

LEAD CASE:

Case No.: 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:

Case No.: 37-2017-00033321-CU-FR-CTL

Case No.: 37-2017-00043712-CU-FR-CTL

**DECLARATION OF PLAINTIFF JANE
DOE NO. 15 IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT DOMI PUBLICATION
LLC'S SPECIAL MOTION TO STRIKE
[CCP §425.16]**

Date: August 31, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Location: C-73

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DECLARATION OF JANE DOE NO. 15

I, Jane Doe No. 15, hereby declare as follows:

1. I am over 18 years old and have personal knowledge of each fact stated in this declaration. If called as a witness in this action, I could and would competently testify as follows.
2. On or about February 18, 2016, I responded to an advertisement posted on Craigslist that purported to be for “modeling.” I was directed to view www.beginmodeling.com. I visited that website and it did not mention pornography at all. Instead, it featured fashion models for still framed photography. I responded to the advertisement saying I was interested. A true and correct copy of the website www.beginmodeling.com that I visited is attached hereto as **Exhibit A**.
3. On February 19, 2016, I got an email from “Jonathan N” from the email address jobs@beginmodeling.com. A true and correct copy of this email is attached hereto as **Exhibit B**.
4. A few days later, I spoke to “Jonathan” on the telephone for about one hour. During this conversation, “Jonathan” told me I would be paid \$5,000 to film five sexual positions, which would each take five to seven minutes to film. I asked Jonathan several times on the phone whether the video would be posted on the Internet and he assured me each time that it would not. Instead, he told me the video would be distributed on DVD in Australia, United Kingdom and some other countries outside of the United States. Jonathan also told me that he would provide references with whom I could speak to answer any of my questions.
5. On February 24, 2016 at 7:22pm and 7:23pm, I received two emails from Jonathan at the job@beginmodeling.com email address providing names and phone numbers for references named “Amberlyn” and “Kaitlin” (although I later learned her name was spelled “Kailyn”). True and correct copies of these emails are attached hereto as **Exhibit C**. Jonathan never told me that he was paying these women to act as references or that he had coached them what to say.

- 1 6. On February 24, 2016 at 7:29pm, I received a text message from “Amberlyn”. A true
2 and correct copy of that text message is attached hereto as **Exhibit D**.
- 3 7. I also received a text message from 480-510-**** that same night, which is the same
4 phone number Jonathan provided for Kailyn in his email earlier. I asked Kailyn several
5 questions about the distribution of the videos. Kailyn told me the videos would never be
6 posted online. When I told her I could not have anyone find out about the videos, Kailyn
7 said “there is absolutely no way anyone will find out.” When I told Kailyn that Jonathan
8 told me the videos would be distributed on DVD in Australia, Kailyn stated, “Yeah so it
9 goes out to wealthier countries; yea DVDs and stuff like that but nothing online!” True
10 and correct copies of the text messages I exchanged with Kailyn and a screenshot of the
11 contact for “Kaylin” that is in my phone are hereto as **Exhibit E**.
- 12 8. Prior to flying to San Diego, in addition to text messaging and speaking with Jonathan on
13 the phone, I also video conferenced with Jonathan via FaceTime. The person depicted in
14 the picture attached hereto as **Exhibit F** looks like the person I video-conferenced with. I
15 have been informed and believe that the picture is defendant Michael Pratt.
- 16 9. On February 28, 2016, I flew to San Diego. I arrived around 8:30 am. My return flight
17 was scheduled for 7:45 pm that same day. My itinerary is attached hereto as **Exhibit G**.
- 18 10. When I landed, nobody came to pick me up as I had discussed with Jonathan the prior
19 day. I called the phone number I had for Jonathan (whom I know believe to be defendant
20 Michael Pratt) several times but he did not answer. Eventually I was picked up by an
21 Asian man who called himself Teddy. We drove around while Teddy tried to contact
22 Jonathan. During that time, I spoke with Teddy about the distribution of the video. He
23 told me the videos would not be online and even mentioned how he liked the authenticity
24 of making a hard copy version because online pornography seemed so cheap to him. I
25 have a vivid recollection of him saying this because I thought it was extremely unusual.
26 Around 1:00 pm, Teddy took me to a hotel, and then to a second hotel.

27 ///
28 ///

- 1 11. When I got in the room, it was just me and Teddy. A makeup artist came into the room
2 and did my makeup. Andre Garcia (the actor) eventually came in the room, but
3 immediately went to the bathroom and it sounded like he began vomiting. After coming
4 out of the bathroom Andre Garcia and Teddy provided me with paperwork they said I
5 needed to sign. Andre Garcia told me the documents said the video would not be online,
6 and would only be on DVD, which would be sent to countries outside of the United
7 States. I asked again if my name would ever be released and he confirmed that it would
8 not. Teddy also told me during this time that the video would not be posted on the
9 Internet and would be distributed outside the of the United States. They told me I needed
10 to fill out the contract quickly because the shoot would take several hours—despite the
11 previous representations that it would be 30 minutes of filming—and my return flight
12 was only a few hours away.
- 13 12. When the filming was over, I got in an Uber to get to the airport. They paid me \$2,000
14 less than I was promised prior to flying to San Diego. When I told Johnathan via text
15 message that I felt taken advantage of because they had promised me more money before
16 they had flown me to San Diego, and because they forced me to do far more than what
17 they had represented, Jonathan told me: Yeah you're bruised up I can't have that.
18 Honestly .. My partner and I were not very impressed with the photos. You have bruises
19 over your body and cuts on your wrists and arms.
- 20 13. Photos is one thing, in person is another. You were paid very well. \$3,000 is about 4x
21 more than the regular pay girls get, you were also offered a solo tomorrow for \$1,000.
22 Attached hereto as **Exhibit H** are true and correct copies of the text messages between
23 Jonathan and I.
- 24 14. About a month later, my video was published all over the Internet, including on
25 www.girlsdoporn.com and www.girls-do-porn.com. My friends and family were all sent
26 links of the video. Once the videos were released, I sent a text message to Kailyn telling
27 her that she had lied to me. She never responded. A true and correct copy of the text
28 message is attached hereto as **Exhibit I**.

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

Date: 8/19/2018


Jane Doe No. 15

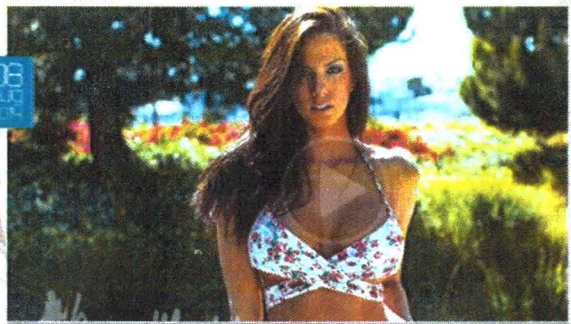
Exhibit A



[APPLY NOW](#) | [PHOTOS](#) | [MODELS REFERENCES](#) | [MEDIA](#) | [CONTACTS](#)

Begin Modeling is a top United States production company garnering international talent in Australia and Eastern Europe as well as the US. We attract only the most beautiful women, in part, because we provide for real needs. Whether its covering travel or other expenses, we attend to the details, and ensure you a comfortable start. Beyond expenses you'll appreciate ongoing work which compensates well above-industry standards. Top companies all over the world seek talent of your caliber, but only one steps up with immediate cash-compensation, freeing you from deceptive contracts or bank hassles, and leaving you in charge of your success. At Begin Modeling we know how it can be when you start out because we work almost exclusively with new talent. You probably have questions and could use some real answers. Apply with us so we can put you directly in touch with former and current models with whom we work. This will give you a chance to ask questions, learn more about us, and get your modeling career moving!

FEATURED PROJECT:

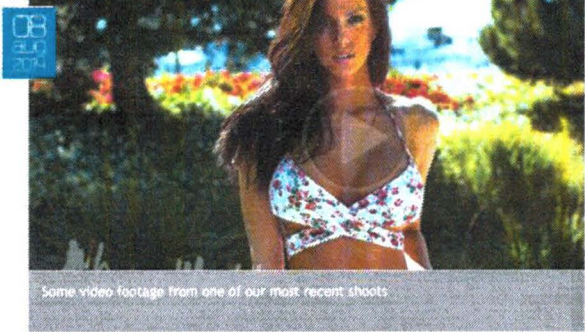
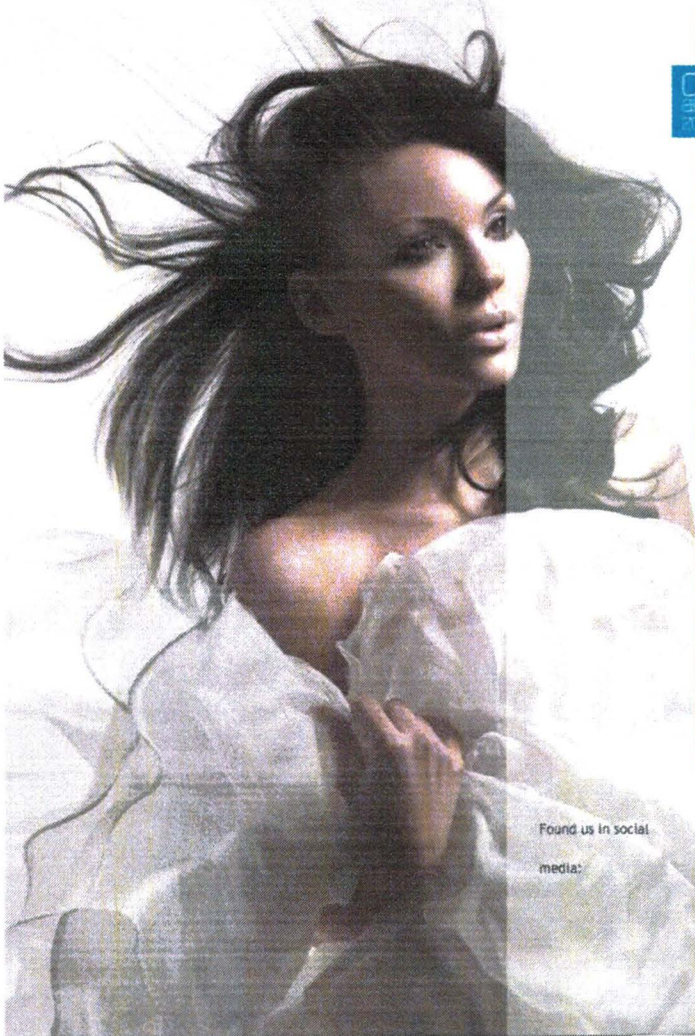


Some video footage from one of our most recent shoots

FEATURED PROJECT:



Photo Shoot 5/23/2014 | Photo Shoot 7/13/2014 | Photo Shoot 8/1/2014



FEATURED PROJECT:



APPLY NOW AT [BEGINMODELING.COM](http://beginmodeling.com)

Name: Age:
Height: Weight:
State: City:
E-mail: Phone:
Add Image: no file selected

Found us in social media:



© BeginModeling.com-2014

Exhibit B



Fwd: Photos from model

1 message

----- Forwarded message -----

From: **Jonathan N** <jobs@beginmodeling.com>

Date: Fri, Feb 19, 2016 at 3:27 PM

Subject: Re: Photos from model

To: [\[REDACTED\]@gmail.com](mailto: [REDACTED]@gmail.com)

Hello [REDACTED] thank you for expressing interest in our ad , we receive many applicants, but only a select few get this reply as we are very picky about who we work with.

This is a legitimate adult gig for an established Southern California company. You will make \$4000 CASH for your first shoot which is paid up front, consistent work is also available, we offer solo toy scenes for \$1000. You can do BOTH scenes in one trip for \$5000.

This is a 30 minute adult video. Only the producer and talent are present during your shoot. All shoots are held at a luxury upscale location with only 3 people, the male model, the director and yourself.

None of your personal information will be given out in the video or afterwards , no names etc are used in the video.

We have two male talent available that you can pick to work with, both are tested, in good shape, and under 25. Pictures of them are available.

You will not be working with any "agents" or agencies who are just the "middle man". This is directly through the production company.

We have shot over 200+ models, you can speak or Skype with as many as you want and talk to them about their experience with us. We are by far one of the top companies in the country.

We pay all expenses for you to beautiful Southern California. You're hotel will be an amazing one, in one of the countries richest areas..

Unlike other film companies, we let you pick who you want to work with, we always pay in cash, and we pay ALL expenses, food, flight, hotel, everything.

If you are interested please let me know, or have any questions you may want answered

Thanks

Johnathan : jobs@beginmodeling.com

WWW.Beginmodeling.com

(858) 598-3205

From: [REDACTED]
Sent: Thursday, February 18, 2016 8:40 AM
To: jobs@beginmodeling.com
Subject: Photos from model

Name [REDACTED]
Age 18
Height 5'4
Weight 120
State [REDACTED]
City [REDACTED]r
Email [REDACTED]@gmail.com
Phone 9496370880

Exhibit C



Fwd: Model Reference Amberlyn

1 message

----- Forwarded message -----

From: **Jonathan N** <jobs@beginmodeling.com>

Date: Wed, Feb 24, 2016 at 7:22 PM

Subject: Model Reference Amberlyn

To: [REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>

This is Amberlyn, she has done two shoots with us and is from Northern California. She is very polite and nice. She can facetime with you, skype, text, call, whatever you'd like.

If you need more references feel free to ask.

[\(619\) 490-7270](tel:(619)490-7270)

2 attachments



11034240_742737415845136_4335779201186132949_n.jpg
70K



12096551_1028818227163034_7492504774493308125_n.jpg
52K

Fwd: Model References

1 message

----- Forwarded message -----

From: **Jonathan N** <jobs@beginmodeling.com>

Date: Wed, Feb 24, 2016 at 7:23 PM

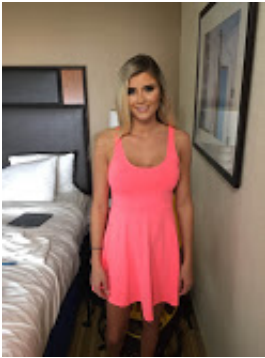
Subject: Model References

To: [REDACTED] <[REDACTED]@gmail.com>

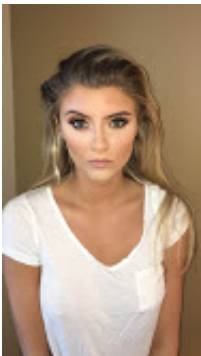
This is Kaitlin, she is 19.

She is from Scottsdale, AZ and has done 2 shoots with us.
We pretty much paid for her breast job and she is recovering.
She also worked with the same talent that you will work with
Here is her cell: (480) 510-0324,

4 attachments



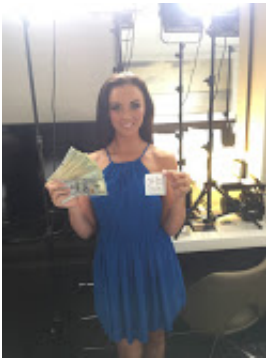
IMG_0453.JPG
594K



IMG_0456.JPG
65K



11885337_10203713572080356_1167286048742034943_n.jpg
75K



IMG_1333.JPG
329K

Exhibit D

[← Messages \(2\)](#) **Amberlyn**[Details](#)

iMessage

Wed, Feb 24, 7:29 PM

Hi this is Amberlyn,
Johnathan asked me to
reach out to you to see if
I could answer any
questions or concerns
you may have. Please
feel free to call me back
at anytime 😊



iMessage



Exhibit E

[← Messages \(1\) Kaylin](#)[Details](#)

Hey [REDACTED] my name is Kailyn- Jonathon gave me your contact info! Im sure you're nervous or maybe even sketched out a little bit but you seriously have nothing to worry about!

It's completely legit, once you land (if you're flying in from out of town that is*) you will be picked up in a nice car and taken to where you are shooting your scene and all that OH AND they pay you in cash up front! Okay so I am a very easily sketched out person when it comes to stuff like this I was very Nervous but once I got



 Messages (1) Kaylin[Details](#)






are shooting your scene
and all that OH AND they
pay you in cash up front!
Okay so I am a very
easily sketched out
person when it comes to
stuff like this I was very
Nervous but once I got
there I felt like a
complete idiot because I
realized I had nothing to
worry about haha -
lowkey was a little
embarrassed haha 🙈😂
The model is super hot
which is nice 😊 and the
photographer is super
cool
It's you, the model, and
the photographer in the
room and no one else so
it's not uncomfortable or
anything which is chill



iMessage



 Messages (1) Kaylin[Details](#)

lowkey was a little
embarrassed haha  
The model is super hot
which is nice  and the
photographer is super
cool
It's you, the model, and
the photographer in the
room and no one else so
it's not uncomfortable or
anything which is chill
Girl if you have any
questions please ****DO
NOT**** hesitate to text me
or call or FaceTime or
whatever!!!!  

Hey thank you for being
so nice! That's exactly
where I am at!

These aren't distributed
in America right?



iMessage



⏪ Messages (1) Kaylin

Details

No prob! And no they aren't!

Wed, Feb 24, 9:17 PM

Is there anyway they can get back to the US? I just have this shaky thing with this guy I like love and I can't have anyone find out

No no no you're totally fine!
That's what I was worried about but there is absolutely no way anyone will find out

Where are the videos going exactly? Like DVDs I think he said in Australia



iMessage



← Messages (1) Kaylin

Details

Where are the videos going exactly? Like DVDs I think he said in Australia UK, but like DVDs or..?

Yeah so it goes out to wealthier countries; yea DVDs and stuff like that but nothing online!

Ok cool

And will my name be anywhere, can I request to be like my middle name Nicole just cause I've never met another

I'm actually not sure! Lol I never really thought of that! There's no stage




iMessage



[← All Contacts](#)[Edit](#)**Kaylin**

mobile

+1 (480) 510-

FaceTime



Notes

[Send Message](#)[Share Contact](#)[Add to Favorites](#)

Favorites



Recents



Contacts



Keypad



Voicemail

Exhibit F



Exhibit G

Fwd: Flight Confirmation

FORWARDED

----- Forwarded message -----

From: **Jonathan N** <jobs@beginmodeling.com>
Date: Wed, Feb 24, 2016 at 7:13 PM
Subject: Flight Confirmation
To: [REDACTED] <[REDACTED]@gmail.com>



Access your itinerary anywhere.

[GET THE FREE APP](#) 

San Diego

Feb 28, 2016 - Feb 28, 2016 | Itinerary # 1 [REDACTED]



This email can be used as an E-Ticket.

Itinerary [REDACTED]

To get the most up-to-date version of your trip, go to your [online itinerary](#) and print a copy to take with you.

Important Information

- Your flight booking is with a low cost airline and can only be changed or cancelled by contacting the airline directly. For convenience, you can select the airline from our [online check-in page](#) . Please note that Expedia may not be advised if you change or cancel your flight with your airline directly, or if the airline makes any changes to your flight schedule. These changes may not be reflected in your Expedia Itinerary, so please ensure that you also print out any subsequent itinerary change emails you receive directly from the airline.
- We recommend you [complete online check-in](#) and pre-purchase all extras or baggage allowances prior to travelling to avoid higher fees charged by some airlines at the airport.

- Remember to bring your itinerary and government-issued photo ID for airport check-in and security.

██████████ → San Diego (SAN)
 Feb 28, 2016 - Feb 28, 2016, 1 round trip ticket

CONFIRMED

Your reservation is booked and confirmed. There is no need to call us to reconfirm this reservation.

Traveler Information

██████████ No frequent flyer details provided
 Adult

* Seat assignments, special meals, frequent flyer point awards and special assistance requests should be confirmed directly with the airline.

Feb 28, 2016 - Departure Nonstop Total travel time: 2 h 42 m

██████████	San Diego	2 h 42 m
		833 mi
██████████ 6:45am	SAN 8:27am	
	Terminal 1	
██████████		
Economy / Coach (R) Confirm seats with the airline *		

Feb 28, 2016 - Return Nonstop Total travel time: 2 h 21 m

San Diego	██████████	2 h 21 m
		833 mi
██████████ SAN 7:45pm	██████████ 11:06pm	
	Terminal 1	
██████████		
Economy / Coach (Y) Confirm seats with the airline *		

Airline Rules & Regulations

- We understand that sometimes plans change. We do not charge a cancel or change fee. When the airline charges such fees in accordance with its own policies, the cost will be passed on to you.
- Tickets are nonrefundable, nontransferable and name changes are not allowed.
- Please read the [complete penalty rules for changes and cancellations](#) applicable to this fare.
- Once your booking is completed, you may receive two booking

Price Summary

Traveler 1: Adult	\$498.00
Flight	\$437.02
Taxes & Fees	\$60.98
Total: \$498.00	

All prices quoted in US dollars.

Additional Flight Services

- The airline may charge **additional fees** for checked baggage or other optional services.

confirmations by email, one from Expedia and another from the airline. The airline confirmation code included in the Expedia itinerary will be required for check-in.

- Please read important information regarding [airline liability limitations](#) .

Need help with your reservation?

- Visit our [Customer Support](#) page.
- Contact the airline directly for questions and changes to your reservation. For convenience, you can select the airline from our [online check-in page](#) . Please reference the airline confirmation code provided on this itinerary.

Expedia+

130 points

For this trip



- 100 base points for this trip
- 30 bonus points for +gold Bonus

Complete Your Trip

Get rested
[Add a Hotel](#)

Get around
[Add a Car](#)

Get out and explore
[Add an activity](#)

Find deals on rides to
your Hotel
[Get a Ride](#)

Please do not reply to this message. This email was sent from a notification-only email address that cannot accept incoming email.

You are receiving this transactional email based on a recent booking or account-related update on [Expedia.com](#) .

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(EMID: PT-ETM-ENSIED-teid1.0-issu1-testX-lang1033-verX-mcidX-segaX-segbX-segmX-key-paid)(MD: 20160224081136)(EPID: X)(ETID: 1170108)

Exhibit H

Yeah you're bruised up I can't have that.

And it's \$1000 more for a solo. You can stay and do it in the morning I'll re book your flight

Today 6:28 PM

Well theoretically we had enough time to do both shoots, it just seemed like slow planning, and this is way more than I agreed to and less money than I was told. At least pay me the full amount

I feel like I was taken advantage of, none of that was what I agreed



Text Message

Send

[← Messages](#)**Johnathan**[Details](#)

I wrote down exactly what you said there was going to be and it was double the amount of work!

And I'm pretty sure I'm about to miss my flight

Honestly.. My partner and I were not very impressed with the photos. You have bruises over your body and cuts on your wrists and arms.

I don't care I sent you accurate pictures and you had every moment to tell me the pay was less and I wouldn't have

**Send**

← Messages **Johnathan**

Details

I don't care I sent you accurate pictures and you had every moment to tell me the pay was less and I wouldn't have done it!

And I also wouldn't have done it if I had known what I actually had to do!

You're taking advantage of young women, I am all for adult videos but what you are doing is misleading and entrapping

I honestly feel violated

I told them it hurt and they made me keep going



Text Message

Send

[← Messages](#) Johnathan[Details](#)

I regret this entire experience

Photos is one thing, in person is another. You were paid very well. \$3,000 is about 4x more than the regular pay girls get, you were also offered a solo [tomorrow](#) for \$1,000. You have a hotel and all your food expenses paid. Also, I sent you money for transportation, I'm willing to pay your new flight, etc, don't have a breakdown because of some flight.

My staff is completely polite and if it hurt I'm

[Send](#)

[← Messages](#) Johnathan[Details](#)

sorry. That's never the goal. Towards the end it takes its toll on your body

I showed up here, waited at the airport for two hours, I did pay for my own food there, was rushed, told I had to do two more blow jobs, PLAY WITH MYSELF FOR NO EXTRA FUCKING PAY, and then got paid 2,000 less and was made late for my flight which I repeatedly reminded them about, the schedule could have been more smooth, had not everyone been drinking last night LIKE I WAS TOLD NOT TO DO,

[Send](#)

Exhibit I

← Messages (1) Kaylin

Details

YAS honey
You will NOT have a
problem with him 😬 😊

Hahahaha 😘 I love you,
thank you so much

Anything you need 😘

Tuesday 3:34 PM

Hey

You lied to me and they
lied to me, it's on a
website now and my
whole town back home
knows

This ruined my life

Read Tuesday



iMessage

