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**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Civil Action No. 20-1151

Mikaela Seales,)	
)	COMPLAINT
Plaintiff,)	
)	
V.)	JURY TRIAL DEMAND
)	
Liz Crokin,)	
)	
Defendant.)	
)	

Plaintiff Mikaela Seales (“Mikaela”) brings this lawsuit against Defendant Liz Crokin (“Crokin”) for defamation. Mikaela Seales is a disabled

artist—photographer, lamp maker and former woodworker. Using the social media platforms she developed for art sales, Mikaela also engages in independent investigative journalist work in the arena of victim advocacy and exposing sex crimes. In December 2018—whether out of personal animus, political enmity, or fear of a challenge from a rising star in the niche of investigative journalist/political pundit/advocate for victims of sex crimes in which Crokin has long dominated—Crokin lied about her perceived rival Mikaela Seales. Crokin lied publicly, unambiguously, and with obvious malicious intent. Mikaela has been harmed by Crokin’s lies—and American journalism has suffered as well. With this action, Mikaela seeks to hold Crokin accountable for distorting the truth, suffocating civil discourse, and ultimately disempowering the downstream consuming public.

NATURE OF THE CASE

1. Mikaela Seales has lived her life with one guiding principle: kindness. This means putting the needs of others before her own and bringing joy to others. That’s why she pursued a career in comedy and acting. That’s why, after her scooter accident left her disabled and unable to act, she began making art—to bring

beauty to the world. And that's also why, in free time, she's engaged in activism for sexual abuse victims.

2. Living by this principle, Mikaela has focused her investigative journalist attention on exposing sex abuse. For example, in December 2018, Mikaela tirelessly investigated a high-profile alleged child abuse ring. New to the field of investigative journalism, Mikaela respected the field's longtime leader, Liz Crokin. Initially, Crokin, after reading Mikaela's publications, exchanged cordial pleasantries and offered encouragement to Mikaela via private messages. As Mikaela's publications gained popularity, Crokin became jealous of a rival journalist who could diminish Crokin's own clout.

3. Crokin—arguably America's most well-known “Truther”¹—couldn't stomach the thought of an intruder on her coveted professional turf. Thus, in December 2018, Crokin took action by lying, publicly and loudly, about Mikaela. Specifically, in widely disseminated national comments, Crokin falsely stated that Mikaela—a disabled artist and former aspiring actress now living in her Midwestern mother's home due to her inability to support herself because of

¹ A person who doubts the generally accepted account of an event, believing an alternative agenda exists to conceal the true explanation. See <https://www.lexico.com/en/definition/truther>

disability—is a very dangerous, psychotic, and violent crisis actor and Deep State² plant. Crokin’s false assertions were made in a deliberate attempt to derail Mikaela’s growing popularity in their suddenly jointly-occupied niche of investigative journalism.

² The origins of the term *Deep State* are from the secretive Turkish network known as *derin devlet*. This group was founded in 1923 by Mustafa Kemal Atatürk with the purpose of undertaking clandestine acts to preserve the current governmental structure. These acts included coups and private assassinations of figures who were seen as hostile to the establishment; they were particularly targeted toward the press, communists, Kurds, and other dissenters. *Deep State* has since come to mean any unelected “shadow government” operating behind the scenes of a democracy. If true, this would mean that the democratic process is a façade. *Deep State* has traditionally been used by the United States press in reference to the governments of countries like Russia and Turkey, but starting in the 2010s, it has increasingly been used to describe the United States government by those who favor alternative political theories.

There are widely differing theories about what the *Deep State*’s purpose is, if it does exist. Libertarian Ron Paul, who ran as a Republican candidate for US President in 2008 and 2012, has stated his belief in a *Deep State* whose primary agenda is continuing a neoconservative foreign policy, continuing the Middle East-focused policies of the Bush/Cheney administration. This theory gained more support in 2013, when Edward Snowden released evidence that the US had been conducting massive surveillance upon its citizens.

However, since then, the Trump administration has altered the popular meaning of *Deep State*, similar to the administration’s appropriation of the term *fake news*—a term which originally referred to unsourced clickbait news from unverified outlets—as any news printed by legitimate press outlets that reflects badly upon the President or his administration. While prior arguments about a US *Deep State* were related to Bush-era policies, the Trump administration claims that their goals are being held back by a *Deep State* composed of former Obama-era allies, who are supposedly trying to sabotage the new administration. Opponents argue that because the Trump administration ran its campaign on an anti-government platform, and they now *are* the government, they are simply hijacking the *Deep State* concept as a straw man in which to blame their defeated initiatives, reports of internal chaos, and frequent information leaks. See <https://www.dictionary.com/e/politics/deep-state/> (emphasis added).

4. Crokin had no basis for making her false assertions about Mikaela—and indeed, there is no factual basis for Crokin’s conspiracy theory. Crokin’s peddling of this theory has harmed Mikaela, has harmed U.S. media, and has, as a result, harmed the American populace. Mikaela brings this lawsuit to ensure that the truth prevails and to ensure this country’s journalists are held accountable for intentionally trying to distort the truth and/or deplatform a professional colleague.

PARTIES

5. Mikaela Seales is a natural person who is a citizen and domiciliary of the State of Minnesota

6. Crokin is a natural person who is a citizen and domiciliary of the State of California.

JURISDICTION

7. This Court has personal jurisdiction over Seales because she is a citizen and domiciliary of the State of Minnesota.

8. This Court has subject matter jurisdiction because Mikaela and Crokin are citizens of different states and the amount in controversy exceeds \$75,000 exclusive of interest and costs.

VENUE

10. Venue is proper in this judicial district because Mikaela resides in this district and because a substantial part of the events giving rise to this Complaint occurred in this district.

FACTUAL ALLEGATIONS

I. Background

A. Mikaela Seales

11. Mikaela is a disabled artist living with her mother in Minnesota, where she was born and raised. Prior to her disability, Mikaela made ends meet through handcrafted woodwork and artisan lamps. After a scooter accident left her unable to work, and woodworking exacerbated this injury, Mikaela focused her attention on the journalistic endeavor of investigating and exposing sex abuse.

12. Mikaela's investigative journalism and advocacy writing are the culmination of a lifetime spent listening to and encouraging oppressed and minority voices to speak up—from earlier attempts at a career in acting to artisan woodworking.

13. As a teenager, after learning of a school teacher's sexually abusive conduct toward another student, Mikaela reported this to the authorities. In early

childhood parlance, this “tattle-tale” disposition was the foundation for a life mission to help those who couldn’t help themselves.

14. Hampered by her scooter injury and piqued by the WikiLeaks publication of leaked Democratic National Committee emails in 2016, Mikaela slowly shifted her focus from art to independent political research and investigations. Reading the headlines, day after day, Mikaela couldn’t look away from the infiltration of corruption and deception at the highest level of American politics. In 2017, Mikaela began publishing her work on Instagram and Twitter.

15. Since late 2017, as an independent pundit, journalist and whistleblower, Mikaela has continued her research on corruption writ large in American politics. Slowly and steadily, Mikaela amassed a growing following. Mikaela’s motivation remains rooted in service to the American people, the highest regard for truth and transparency, and an ingrained desire for systemic fairness.

B. Liz Crokin

16. Crokin is a political pundit, so-called investigative journalist, celebrity gossip columnist and gossip editor, and, most recently, a major amplifier of the

pro-Trump QAnon³ Truther movement. Most recently, Crokin has been in hot legal water for other defamation actions. Specifically, cookbook author Chrissy Teigen and her singer-songwriter husband John Legend threatened legal action against Crokin for making alleged false claims that the couple were involved in a child sex trafficking ring with their 1-year-old daughter. In effect, Crokin hurled similar defamatory allegations at Mikaela.

II. Crokin's Defaming Mikaela

A. Crokin's Defamatory Statements

17. On December 12, 2018, Crokin posted defamatory content on her personal Instagram account. Crokin stated that "I work very hard to be accurate & to spread truth & I've done this my entire journalism career spanning over two decades. However, there are people who are controlled opposition." Next, Crokin addresses Mikaela specifically:

One of the many concerns that is worth scrutiny is that Mikaela is tied to Hillary Clinton and the DNC's law firm Perkins Cole via the trustee on her bankruptcy. She denies having any affiliation with Clinton's lawyers. However, her trustee, Brian Audette, is employed by Perkins Cole...Perkins Cole is the same law firm that the Clinton Campaign and the DNC used to retain Fusion GPS. Fusion GPS hired dossier author Christopher Steele, a former British intelligence officer with

³ QAnon is a ...theory detailing a supposed secret plot by an alleged "deep state" against U.S. President Donald Trump and his supporters. See *en.wikipedia.org* › *wiki* › *QAnon*.

ties to the FBI. The Clinton campaign and the DNC paid 9.1 million dollars to Perkins. Also, I find it alarming she was part of the Resistance, was anti-Trump; posting photos of President Trump's head on a stake in a parade; yet, sporadically starts to insist she's pro QAnon. (Research her social media history.) James Alefantis, Phillipe Reines & mother members of the Cabal have made a point to draw attention to her...One of my biggest concerns with all the information I've acquired, is that she may possibly be a Deep State plant.

(“Defamatory Statements”).

18. On December 12, 2018, Crokin posted defamatory content on her persona Twitter account “Joe M” who uses handle “@StormIsUponUs.” When viewed as a whole, the overall effect is to falsely and viciously attack Mikaela's credibility (on Twitter with handle @robotinteriors) as an honest and accurate news source. Specifically, Crokin falsely states that Mikaela is an “MKUltraVictim.” Crokin falsely states that Mikaela “exhibit[s] the same traits as the #MagaBomber.” Crokin falsely states that Mikaela has said “threatening and violent things.” Crokin falsely states that Mikaela is “tied to Hillary Clinton's lawyers & the Steele Dossier & many other shady connections.” Crokin falsely states that Mikaela has “psychiatric issues.” Crokin falsely states that Mikaela is a “crisis actor.” Crokin falsely states that Mikaela is “very dangerous.” The Tweets are itemized and included in full below:

- a. *1. Liz Crokin asked me to share a potential #MKUltra victim exhibiting same traits as the #MagaBomber (the van). Same pattern. Leftist Clinton-connected history, becomes a Trump and Q supporter, and saying threatening and violent things. @FBI INVESTIGATE!*
- b. *2. Liz: 'Her handle is @robotinteriors, I ran a background check on her. She is tied to Hillary Clinton's lawyers & the Steele Dossier & many other shady connections'*
- c. *3. James Alefantis & Phillippe Reines both are drawing attention to her & Phillippe is saying this girl is capable of violence. I think they are setting her up for a false flag. She has psychiatric issues and she's also a crisis actor.*
- d. *4. I think they're aligning her with me to discredit & make the movement look bad. I'm trying to get this info on the boards so they can do a deeper dive. She's very dangerous. The language she uses in her writing too is very alarming. They seem to be teeing her for a FF.*

19. In 2018, Crokin's Instagram account had approximately 26,000 followers. The Defamatory Statements received at least 600 "likes." Crokin has a large audience across social media platforms and the Internet—including

Facebook, Instagram and Twitter, amongst other places. Crokin's net worth is valued around \$1 million.

20. On December 12, after viewing the Defamatory Statements, Mikaela confronted Crokin, asking her to retract the lies. Instead, Crokin doubled down on the Defamatory Statements. For example, Instagram user "kikil2020" asked Crokin's about the Defamatory Statements. Crokin responded: "People can do their own research." She continued: "I'm back to focusing on exposing pedos."

21. Crokin's Defamatory Statements immediately harmed Mikaela. In the professional space of journalism—like politics and virtually every other profession—credibility is king. Credibility is the currency of journalists. With credibility, the audience will trust and therefore consume a journalist's content. Without credibility, the journalist is jettisoned, shunned, ignored. Crokin's Defamatory Statements plundered Mikaela's credibility. This constitutes harm. Despite reprobation of Crokin by several Instagram users for her baseless conspiracy-mongering, Crokin's Defamatory Statements spread like wildfire across the Internet, and took on a life of their own. Hundreds of followers read a well-known authority figure, Crokin, unfurl a litany of Defamatory Statements. Even a cursory analysis of the pre vs post Defamatory Statement Instagram/Twitter

landscapes show that Crokin's false, malicious statements about Mikaela were accepted as true by hundreds of Americans, including large numbers of Mikaela's (former) followers.

22. In short, Crokin got exactly what she wanted by lying about Mikaela—she harmed a rising rival's reputation and ignited a damaging whisper campaign based on baseless, but vicious, untruths.

B. Crokin Refuses to Retract the Defamatory Statements

23. Despite calls from Mikaela and other figures active in this social media niche to correct the record, Crokin did not retract the Defamatory Statements. Nor did she apologize for the Defamatory Statements.

24. Before bringing this lawsuit, Mikaela wrote to Crokin and advised her of the complete and total falsity of the Defamatory Statements. Mikaela also asked Crokin to retract the Defamatory Statements.

25. Crokin refused to retract the Defamatory Statements and instead stood by them. Further, after Mikaela's requested retraction, Crokin blocked all Mikaela's social media accounts. Crokin continues to stand by her Defamatory Statements. She refuses to apologize. And Mikaela continues to be greatly injured.

C. The Defamatory Statements are False and Defamatory *Per Se*

26. The Defamatory Statements are false and defamatory *per se*.

27. The Defamatory Statements expressly stated, and specifically conveyed, that Mikaela—a disabled artist and aspiring investigative journalist working to expose sex abuse—is a very dangerous, psychotic, and violent crisis actor and Deep State plant. The ordinary and average person who heard and read the Defamatory Statements understood them to be making serious charges against Mikaela: that Mikaela is a tool of, and perhaps an agent of, the “Deep State”—an entity antithetical to Mikaela’s values of journalistic integrity and universal safety, security, and freedom.

28. The Defamatory Statements indisputably were made about and concerned Mikaela. This much is clear from Crokin’s doubling-down and refusal to retract, as well as from innumerable media reports interpreting the Defamatory Statements as concerning Mikaela. Instagram users, pundits, commentators and observers throughout the country interpreted Crokin’s Defamatory Statements exactly as they were intended to be interpreted: as referring to Mikaela, and stating as fact that Mikaela was a Deep State plant.

29. The Defamatory Statements implicitly conveyed additional information. The ordinary and average person who read the Defamatory Statements understood them to mean that Mikaela was very dangerous, psychotic, and a violent crisis actor and Deep State plant. As a result, the ordinary and average person understood the Defamatory Statements to mean that Mikaela was a traitor, aligned with the Deep State. As a result of the Defamatory Statements, the ordinary and average person would believe that Mikaela was *not* aligned with her own stated journalistic mission of exposing sex abuse, and instead was aligned with the Deep State agenda promoting sex abuse.

30. The ordinary and average person who read the Defamatory Statements also understood them to be statements of fact. The statements used specific language with a precise meaning that is capable of being objectively characterized as true or false, and the statements were conveyed in a tenor of complete sincerity as conveying facts and not opinions. The ordinary and average person who read the Defamatory Statements understood them to impute Mikaela with a lack of fitness for her profession, both as a journalist and artist. They understood the Defamatory Statements to mean that Mikaela was a very dangerous, psychotic, and violent crisis actor and Deep State plant.

31. The ordinary and average person who read the Defamatory Statements additionally understood them to be statements of fact because Crokin portrays herself to the public as the flagbearer for ensuring that truth and accuracy prevails in matters of politics, especially in this niche of Truther punditry. As an award-winning author, a seasoned journalist, established advocate for sex crime victims, graduate of the University of Iowa with a Bachelor's degree in journalism and political science, former campaign worker for both John Kasich and George W. Bush's presidential campaigns, former intern for Bill O'Reilly at Fox News Channel, former intern for the State Department's White House Correspondent, Crokin is widely perceived by the public as someone who would have access to information and intelligence not available to ordinary Americans, and who would therefore know if Mikaela or anyone else were a very dangerous, psychotic, and violent crisis actor and Deep State plant. Not only that, but Crokin's commentary speciality, if you will, is the flagging of false and misleading statements by politicians and pundits.

32. The Defamatory Statements are materially false because they would have a different effect on the mind of the reader from that which the truth would have produced.

33. Mikaela is not a very dangerous, psychotic, and violent crisis actor and Deep State plant. Instead, Mikaela is a loyal and fiercely independent American journalist, declaring her allegiance to the fight to expose sex abuse wherever it exists. Mikaela has been researching and writing on topics like sex abuse and its perpetrators for over three years. In addition, Mikaela Seales is a disabled artist—photographer, lamp maker and former woodworker.

34. The Defamatory Statements are defamatory because they tend to lead the average person in the community to form an evil or bad opinion of Mikaela, as well as because they tend to discredit Mikaela in the conduct of her occupation and profession.

35. The Defamatory Statements are devastating to an aspiring journalist's reputation. The currency of journalistic value is credibility. Crokin's Defamatory Statements communicate that Mikaela's work is motivated by something evil, dangerous and other than reporting on sex abuse with truth and accuracy. In this context, these Defamatory Statements undermine Mikaela's credibility as a journalist and advocate for victims of abuse. The ordinary and average person who read the Defamatory Statements understood them to be stating that Mikaela's journalistic activities are part and parcel of covert efforts to facilitate abuse.

36. Americans do not want to support sex abuse, and because Crokin maliciously lied, many Americans now associate Mikaela with a movement which incisiously sponsors child abuse. Many Americans now identify Mikaela as a very dangerous, psychotic, and violent crisis actor and Deep State plant. In short, Crokin has to date gotten exactly what she wanted by spreading malicious lies about Mikaela through the Defamatory Statements: she has greatly harmed Mikaela's journalistic aspirations.

D. Crokin Made the Defamatory Statements With Actual Malice

37. Crokin knew that the Defamatory Statements were false. Crokin published these statements knowing they were false. Crokin also intended the Defamatory Statements to be defamatory and endorsed their defamatory nature. At the very least, Crokin acted in reckless disregard of the truth or falsity of the Defamatory Statements when she published them.

38. As an award-winning author, a seasoned journalist, and not just an ordinary American, Crokin had reason to know that the Defamatory Statements were false. She had no facts backing up her Defamatory Statements, including her

claim that Mikaela was a very dangerous, psychotic, and violent crisis actor and Deep State plant. In fact, Crokin had access to reliable information to the contrary.

39. For example, no United States law enforcement or intelligence agencies have claimed, much less presented any evidence, that Mikaela is a very dangerous, psychotic, and violent crisis actor and/or Deep State plant, or engaged in unlawful activity of any variety.

40. Rather than facts or reliable evidence, Crokin's basis for the Defamatory Statements was one or both of: (a) her own imagination; or (b) extremely dubious conspiracy theories that any reasonable person (and especially Crokin, a career investigative journalist) would know to be fanciful, wholly unverified, and inherently and objectively unreliable. In view of Crokin's personal and professional history, there is no other reasonable inference but that Crokin at minimum made a deliberate decision not to acquire knowledge of facts that might confirm the probable falsity of the Defamatory Statements and purposefully avoided the truth—but the more likely inference is that Crokin intentionally lied to harm her perceived personal and professional rival, Mikaela.

41. Actual malice is further demonstrated by the Defamatory Statements' inherent improbability. Mikaela is a disabled artist living in her mother's house in

Minnesota. Prior to her disability, she was an aspiring actress. After her disability rendered her unable to continue acting, Mikaela channeled her artistic energies into woodworking and lampmaking. Using this her social media platforms originally built to promote her art, Mikaela began posting political thoughts in the arena of advocacy to prevent sex abuse. Given this, Crokin would have known there was no basis for her Defamatory Statements.

42. Actual malice is also demonstrated by Crokin's refusal to retract the Defamatory Statements. Before filing this lawsuit, Mikaela wrote Crokin explaining why the Defamatory Statements are false and defamatory and demanded their retraction. Crokin has refused and continues to stand by the statements. Crokin purposefully avoids and recklessly disregards information demonstrating the falsity of the Defamatory Statements.

43. Actual malice is further demonstrated by Crokin's ill will against Mikaela's ex-husband. In addition to Mikaela, Crokin doxxed and defamed Mikaela's ex-husband by publicly disclosing Mikaela and her ex-husband's Chapter 7 Bankruptcy filing, and by falsely stating that Mikaela's ex-husband was a Satanist, respectively. Crokin reserves a special hatred and animosity for

Mikaela—whose popularity on Instagram and Twitter had been steadily rising, without Mikaela’s intent or pre-planning.

44. In October 2018, Mikaela produced and published a video pertinent to an ongoing investigation of a high-profile alleged child abuse ring. This video went viral. Crokin was extremely envious—to put it mildly—that Mikaela achieved such traction and following in Crokin’s journalistic niche. Initially, prior to reposting Mikaela’s video, Crokin messaged Mikaela, feigning friendliness. Once it went viral, Crokin widely disseminated the Defamatory Statements. It has been widely reported by news sources that Crokin knows the defamatory impact of false statements, and thus, intentionality is reasonably imputed to her Defamatory Statements.

45. This ill will is further demonstrated by the doubling-down by Crokin, when questioned by members of her Instagram audience. Crokin, even when pressed, refused to issue an apology or recant her Defamatory Statements.

46. In short, Crokin has a unique and personal animosity toward Mikaela that fueled her hostility towards Mikaela and Mikaela’s journalistic enterprises.

E. The Defamatory Statements Were Republished by Many Media Outlets and Disseminated Wide

47. The press and social media community covered the Defamatory Statements, publishing more articles and commentary about the Defamatory Statements.

48. This reporting interpreted the Defamatory Statements just as the ordinary and average audience member did—that Crokin was asserting that Mikaela was a very dangerous, psychotic, and violent crisis actor and Deep State plant and that her journalism endeavors were part and parcel of an unlawful collusion with government and pseudo-government actors. In response to Crokin’s Defamatory Statements, some pundits and commentators affirmatively called out Crokin for peddling a reckless conspiracy theory that had no factual basis—but as noted earlier, Crokin rejected this criticism and declared her assertions as “fact.”

F. The Defamatory Statements Injured Mikaela’s Reputation

49. The Defamatory Statements have injured Mikaela’s reputation. As a direct and proximate result of Crokin’s intentional and malicious misconduct, Mikaela has suffered anguish and damage to her reputation, with direct and

substantial injury to her positions as journalist, advocate for victims of sex abuse, and independent artist. These substantial injuries are continuing in nature and will continue to be suffered in the future, unless and until they are remediated by this Court.

50. Thousands of Americans heard or read about Crokin's Defamatory Statements. Survey of the post-Defamatory Statement Instagram and Twitter landscapes have shown that Crokin's false, malicious statements about Mikaela, including that Mikaela is a very dangerous, psychotic, and violent crisis actor and Deep State plant were accepted as true by thousands of Americans, including large numbers of Mikaela's followers and supporters.

51. The Defamatory Statements have caused Mikaela to lose potential followers who heard or read about the Defamatory Statements—and thus handicapped her ability to carry on journalistic or any professional endeavors. Mikaela has suffered significant actual damages, personally and professionally, that are estimated to exceed \$75,000—and continue to this day.

FIRST CAUSE OF ACTION

Defamation

52. Mikaela realleges and incorporates by reference each of the preceding paragraphs as if fully set forth herein.

53. The Defamatory Statements were defamatory *per se*. They had a tendency to expose Mikaela to public hatred, contempt, ridicule, or disgrace. The defamatory meaning is clear without reference to extrinsic facts. The defamatory import is apparent on the face of the Defamatory Statements. The Defamatory Statements falsely impute Mikaela with a lack of fitness for her profession(s). The Defamatory Statements would tend to harm, and indeed have harmed, Mikaela in her professions (journalistically, advocacy, and art), and they have assailed her integrity. The Defamatory statements tend to expose, and indeed have exposed, Mikaela to contempt, ridicule, aversion or disgrace. The Defamatory Statements falsely impute criminal conduct to Mikaela.

54. The Defamatory Statements concerned Mikaela. The Defamatory Statements were reasonably understood to be about Mikaela. The reading public would have understood, and did understand, that the Defamatory Statements were of and concerning Mikaela.

55. Crokin published the Defamatory Statements. She communicated the Defamatory Statements to someone other than Mikaela, and Crokin intended that the Defamatory Statements be distributed widely to the American public.

56. The Defamatory Statements were false and substantially untrue. The Defamatory Statements were materially false.

57. When Crokin made the Defamatory Statements, she knew that they were false or acted in reckless disregard of the truth or falsity of the statements.

58. Crokin had no applicable privilege or legal authorization to publish the Defamatory Statements.

59. The Defamatory Statements were a substantial factor in causing Mikaela to suffer economic loss, in an amount to be proven at trial. At present, actual damages are estimated to exceed \$75,000—and continue to this day, with an exact amount to be proven at trial.

60. In addition to actual damages, Mikaela is entitled to appropriate special and punitive damages on account of Crokin's malicious and unrepentant conduct. The amount of these damages will be proven at trial, but in no event should they be less than the amount of Mikaela's actual damages.

PRAYER FOR RELIEF

Mikaela demands judgment against Crokin as follows:

- i. An award of compensatory, special and punitive damages in appropriate amounts to be established at trial;
- ii. Injunctive relief prohibiting the publication or republication of the Defamatory Statements;
- iii. An award of Mikaela's costs associated with this action; and
- iv. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Mikaela demands a trial by jury on all issues so triable.

Date: May 13, 2020

Respectfully Submitted,

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