DISTRICT COURT CIVIL COVER SHEET

Case No.

(Assigned by Clerk's Office)

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| | me and mailing addresses if different) | | | | |
|---|---|---|--|--|--|
| Plaintiff(s) (name/address/phone): | | Defendant(s) (name/address/phone): | | | |
| LAURA HUI | NTER | MICHAEL POWELL, | | | |
| | | GRAVITAS ADVERTISING CORP., | | | |
| | | SCMA HOLDING INC., STANLY SHILOV, | | | |
| | | CHRIS KHACHATURIAN, MENG YANG | | | |
| Attorney (name/address/phone): | | ney (name/address/phone): | | | |
| Marc J. Randazza, Randazz | za Legal Group, PLLC | | | | |
| 4035 S. EL CAP | ITAN WAY | | | | |
| LAS VEGAS, NEV | /ADA 89147 | | | | |
| TEL: (702) 42 | | | | | |
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| II. Nature of Controversy <i>(please si</i> Civil Case Filing Types | etect the one most applicable filing type below) | | | | |
| Real Property | | Torts | | | |
| Landlord/Tenant | Negligence | Other Torts | | | |
| Unlawful Detainer | Auto | Product Liability | | | |
| Other Landlord/Tenant | Premises Liability | Intentional Misconduct | | | |
| Title to Property | Other Negligence | Employment Tort | | | |
| Judicial Foreclosure | Malpractice | Insurance Tort | | | |
| Other Title to Property | Medical/Dental | Other Tort | | | |
| Other Real Property | Legal | _ | | | |
| Condemnation/Eminent Domain | Accounting | | | | |
| Other Real Property | Other Malpractice | | | | |
| Probate | Construction Defect & Contract | Judicial Review/Appeal | | | |
| Probate (select case type and estate value) | Construction Defect | Judicial Review | | | |
| Summary Administration | Chapter 40 | Foreclosure Mediation Case | | | |
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| General Administration | Other Construction Defect | Petition to Seal Records | | | |
| General Administration Special Administration | Other Construction Defect Contract Case | Mental Competency | | | |
| General Administration Special Administration Set Aside | Other Construction Defect Contract Case Uniform Commercial Code | Mental Competency Nevada State Agency Appeal | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts Employment Contract | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other Appeal from Lower Court | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 Under \$100,000 or Unknown | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 Under \$100,000 or Unknown Under \$2,500 | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts Employment Contract Other Contract | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other Appeal from Lower Court Other Judicial Review/Appeal | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 Under \$100,000 or Unknown Under \$2,500 | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts Employment Contract | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other Appeal from Lower Court Other Judicial Review/Appeal Other Civil Filing | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 Under \$100,000 or Unknown Under \$2,500 Civil Writ | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts Employment Contract Other Contract | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other Appeal from Lower Court Other Judicial Review/Appeal Other Civil Filing Other Civil Filing | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 Under \$100,000 or Unknown Under \$2,500 Civil Writ Writ of Habeas Corpus | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts Employment Contract Other Contract | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other Appeal from Lower Court Other Judicial Review/Appeal Other Civil Filing Compromise of Minor's Claim | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 Under \$100,000 or Unknown Under \$2,500 Civil Writ Writ of Habeas Corpus Writ of Mandamus | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts Employment Contract Other Contract | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other Appeal from Lower Court Other Judicial Review/Appeal Other Civil Filing Compromise of Minor's Claim Foreign Judgment | | | |
| General Administration Special Administration Set Aside Trust/Conservatorship Other Probate Estate Value Over \$200,000 Between \$100,000 and \$200,000 Under \$100,000 or Unknown Under \$2,500 Civil Writ Writ of Habeas Corpus Writ of Mandamus Writ of Quo Warrant | Other Construction Defect Contract Case Uniform Commercial Code Building and Construction Insurance Carrier Commercial Instrument Collection of Accounts Employment Contract Other Contract | Mental Competency Nevada State Agency Appeal Department of Motor Vehicle Worker's Compensation Other Nevada State Agency Appeal Other Appeal from Lower Court Other Judicial Review/Appeal Other Civil Filing Compromise of Minor's Claim Foreign Judgment Other Civil Matters | | | |

See other side for family-related case filings.

Date

Signature of initiating party or representative

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CLERK OF THE COURT

Marc J. Randazza (NV Bar No. 12265) Alex J. Shepard (NV Bar No. 13582) RANDAZZA LEGAL GROUP, PLLC 4035 S. El Capitan Way Las Vegas, NV 89147

Telephone: 702-420-2001 Facsimile: 305-437-7662 ecf@randazza.com

Attorneys for Plaintiff, Laura Hunter

CLARK COUNTY, NEVADA

LAURA HUNTER, an Individual,

Plaintiff,

VS.

MICHAEL POWELL, an individual; GRAVITAS ADVERTISING CORP., a Nevada corporation; SCMA HOLDING INC., a Nevada corporation; STANLY SHILOV, an individual; CHRIS KHACHATURIAN, an individual; MENG YANG, an individual; JOHN DOES 1-10; and ROE CORPORATIONS 11-20,

Defendants.

Case No.: A-17-751409-C

Dept. No.:

COMPLAINT AND JURY DEMAND

(1) Violation of NRS 597.770

(2) Violation of RCW § 63.60

(2) Appropriation Name and Likeness

(3) False Light

(4) Violation of Common Law Right of Publicity

JURY TRIAL DEMANDED

ARBITRATION EXEMPTION REQUESTED: DEMAND IN EXCESS OF \$50,000.

Plaintiff Laura Hunter brings this Complaint against Defendants Michael Powell, Gravitas Advertising Corp ("Gravitas"), SCMA Holding Inc. ("SCMA"), Stanley Shilov, Chris Khachaturian, and Meng Yang, and hereby alleges as follows:

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1.0 INTRODUCTION

This case is about the infamous industry known as "fake news." A "fake news" organization stole an innocent person's identity and is using it to falsely proclaim that she is the spokeswoman for this fake news enterprise.

2.0 THE PARTIES

- Plaintiff Laura Hunter is a resident of the State of Washington. She is 2. a beauty pageant winner and is Ms. World 2016. She is also a successful television actress, model and an accomplished photographer who has owned her own photography company, "Beyond Photography," for 20 years.
- Defendant Gravitas is a corporation incorporated under the laws 3. of Nevada and doing business in Nevada, located at 5440 W. Sahara Ave., 12 | Suite 205, Las Vegas, Nevada 89146.
- Defendant SCMA is a corporation incorporated under the laws of 4. 14 Nevada and doing business in Nevada, located at 848 N. Rainbow Blvd., Las Vegas, Nevada 89107.
- 5. Defendant Michael Powell is a resident of Nevada and is the owner, an officer, and registered agent for Gravitas, as well as the president of 18|| SCMA.
 - Defendant Stanley Shilov is a resident of Nevada and is the Chief 6. Technical Officer of Gravitas.
- Defendant Chris Khachaturian is an individual residing in Nevada 7. 22 and is the Chief Operating Officer of Gravitas and is a director of SCMA.
 - Defendant Meng Yang is an individual residing in Nevada and is a 8. director of SCMA.
 - John Doe and Roe Corporation Defendants are either clients of 9. Gravitas and/or SCMA, are employed by Gravitas and/or SCMA, or are alter egos of Defendants Powell, Shilov, Khachaturian, and/or Yang. Plaintiff will

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uncover their identities through the course of discovery and amend this Complaint to provide their true names.

JURISDICTION AND VENUE 3.0

- This Court has personal jurisdiction over all Defendants because 10. they either reside in Las Vegas, Nevada or are incorporated and do business in Las Vegas, Nevada.
- Venue is proper in the Eighth Judicial District Court in Clark County, Nevada pursuant to NRS 13.040 which states that, "the action shall be tried in the county in which the defendants, or any one of them, may reside at the commencement of the action." Here, all Defendants either reside in Las Vegas, Nevada or are incorporated and do business in Las Vegas, Nevada, so venue is proper.

FACTS RELEVANT TO ALL CLAIMS 4.0

Defendants' Theft of Ms. Hunter's Identity 4.1

- On October 25, 2016, Ms. Hunter received an email from Michael 12. 16 Powell, claiming that he "runs a small advertising agency in Las Vegas" and 17 that he had a client who wanted to use Ms. Hunter's headshot "from a few years ago."
 - 13. Ms. Hunter is a model and television actress who has several headshots available online.
- Mr. Powell wanted Ms. Hunter to sign a release for permission to use 14. 22 the photo. Mr. Powell did not, however, say "how" his client wanted to use the photo.
 - Ms. Hunter did not sign the release, and instead asked Mr. Powell to 15. call her directly to discuss the matter.
 - Mr. Powell did not call Ms. Hunter. 16.

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- Mr. Powell eventually emailed Ms. Hunter back and said, "Sorry for 17. the delay here and for not calling – when our client found out that I actually found you and was about to call he freaked out a little bit."
- Mr. Powell admitted that "his client" already used her headshot 18. without permission and was worried that she would sue him.
- Mr. Powell mentioned that he may ask Ms. Hunter to contract 19. away the right to sue his client.
- After this admission, Mr. Powell asked Ms. Hunter to provide more 20. photos in higher resolution, supposedly so Mr. Powell could attempt to convince 10 his client to pay for the right to use her photo.
- Mr. Powell's attempts to play "good cop" in this email were 21. 12 suspicious at best, and fictitious at worst. Ms. Hunter has no idea if this "client" 13 exists since Mr. Powell never revealed the client's identity or why he wanted the photos.
- 22. However, a Google search for "Laura Hunter" reveals that 16 Ms. Hunter's photo and identity have not only been stolen, but unbeknownst to her, Defendants have turned her persona into a highly rated spokesperson for a right wing political web site called the Conservative Daily Review.
- 23. The number one hit on google for Laura Hunter is a Facebook page, called "LauraHunter CDR," with Ms. Hunter's headshot and name (the "Hunter Facebook Page"). (See Google search results for "Laura Hunter" 22 dated February 21, 2017, attached as **Exhibit 1**; see also Hunter Facebook Page, attached as **Exhibit 2**.)
 - The headshot appearing on the Hunter Facebook Page is the 24. same headshot Mr. Powell attached to his October 25, 2016 email.

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- 25. The Hunter Facebook Page does not belong to Ms. Hunter, is not affiliated with Ms. Hunter in any way, and the owner of the Hunter Facebook Page does not have Ms. Hunter's permission to use her name or headshot.
- The Hunter Facebook Page says that Ms. Hunter's official website is 26. the "Conservative Daily Review" and provides a link to the Facebook page "@ConservativeDailyReview" (the "CDR Facebook Page"). The Hunter Facebook Page also posts multiple articles per day that redirect viewers to the web site <conservativedailypost.com> (the "CDP Site").
- The Hunter Facebook Page currently has 899,999 likes and 893,987 27. 10 followers.
- Ms. Hunter is not a conservative. In fact, she is none of the things 28. Defendants claim her to be. They have stolen her identity and used her as a 13|| spokeswoman for and purported author of content and viewpoints antithetical 14|| to her own beliefs.
- Defendants' use of Ms. Hunter's name and likeness goes beyond 29. 16 falsely attributing a political ideology to her, though. The Conservative Daily Review web site ("CDR Site"), located at <conservativedailyreview.com>, is a 18 web site dedicated to spreading false information about American politics; it is part of the epidemic of "fake news" web sites that plagued the 2016 presidential election.
- Similarly, the CDP Site exists and is used for the same purpose: to 30. 22 | spread fake news to promote a conservative political agenda.
 - 31. Defendants published more than one job posting looking for writers of "Conservative Fan Fiction" who can write "stories [that] are not real, but very well could be. You will write them in such a way that they seem factually correct but hard to verify."

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- 32. Defendants published these job postings to hire writers for the Conservative Daily Post; a December 1, 2016 posting by Gravitas on the web site indeed.com stated that successful applicants would work "[a]s a writer and online journalist for Conservative Daily Post."
- 33. In addition to the CDR Facebook Page, the CDP Site also uses Ms. Hunter's name and likeness without her permission. The "Authors" page of the CDP Site claims that Ms. Hunter "is a well-known blogger and political activist known for her constant stream on Facebook. She has been in the reporting and journalism world for almost two decades and has witnessed 10 countless elections and large propositions come and go." (See CDP Site Laura Hunter "Biography" page, attached as **Exhibit 3**.) None of this is true.
 - 34. Defendants know that they have turned Ms. Hunter into a Conservative online muck slinger of fake news, and they must answer for it.
 - 35. As a result of Defendants' actions, Ms. Hunter has suffered a loss of business, and her reputation, both personal and professional, has been damaged.

Defendants' For-Profit Network 4.2

- The CDP Site's "Terms of Service" page lists its mailing address as 36. 5440 West Sahara Avenue, Las Vegas, Nevada 89146. (See CDP Site "Terms of Service" page, attached as **Exhibit 4**.)
- The Nevada Secretary of State lists Defendant Powell as the 37. 22 | registered agent, President, Secretary, Treasurer, and Director of Defendant Gravitas. In each of these capacities, the Secretary of State lists his address as 5440 W. Sahara Ave, Suite 205, Las Vegas, Nevada 89146, the same address listed on the CDP Site. Thus, on information and belief, Defendants Powell and Gravitas own and/or operate the CDP Site.

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- 38. On information and belief, Gravitas is the owner and/or operator of the web site located at <gravitasworks.com>.
- 39. The "Careers" link on the <gravitasworks.com> web site leads to a page listing Defendants Shilov, Khachaturian, and Powell as the Gravitas "Team," and states that Defendants Shilov and Khachaturian are the "CTO" and "COO," respectively, of Gravitas. (See "Work at Gravitas Works" page, attached as **Exhibit 5**.)
- The vast majority of the posts on the CDR Facebook Page link 40. directly to "articles" on the CDP Site. Thus, on information and belief, 10|| Defendants Powell and Gravitas own and/or operate both the CDR Facebook Page and the CDR Site.
- 41. In at least one posting on the CDR Facebook Page from November 13|| 22, 2016, Defendants directly advertise for the web site <persopo.com>, which 14 offers a public records search engine. The registrant of the <persopo.com> domain name is Persopo.com, with a listed address of 848 N. Rainbow Blvd., 16 Suite 20, Las Vegas, Nevada 89107.
- 42. According to the Nevada Secretary of State, Defendant Powell is 18 the President of Defendant SCMA. His address in this capacity is listed as 848 N. Rainbow Blvd., Las Vegas, Nevada 89107, the same address as the <persopo.com> registrant. On information and belief, Defendant SCMA is the registrant of the domain name <scmaholding.com>.
 - Defendant Khachaturian is listed as the Director of SCMA, and 43. Defendant Yang is listed as the Secretary and Treasurer of SCMA. Both are associated with the address 848 N. Rainbow Blvd., Las Vegas, Nevada 89107.
 - As late as March 13, 2016, the <gravitasworks.com> web site was 44. essentially identical to the current version of the <scmaholding.com> web site, and listed Gravitas's address as 848 N. Rainbow Blvd, Las Vegas, NV 89107, the

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same address as Defendant SCMA. (Compare March 23, 2016 Wayback Machine record for <gravitasworks.com>, attached as **Exhibit 6**, with <scmaholding.com> home page, attached as Exhibit 7.)

- Accordingly, on information and belief, Defendant SCMA is an 45. entity that owns and/or controls the CDR Facebook Page, the CDR Site, and 6 the CDP Site.
- 46. The address bar for the <persopo.com> web site contains the 8|| following text: "Persopo.com (SCMA Holding, Inc) [US]." Thus, on information and belief, the <persopo.com> web site is owned and/or operated by 10 Defendant SCMA or one its subsidiaries. (See <persopo.com> home page, attached as **Exhibit 8**.)
- On information and belief, Defendants earn income from the 47. 13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 14 visitors to the <persopo.com> web site, where users then purchase services on 15|| the <persopo.com> web site.
- 48. On information and belief, Defendants use the CDR Facebook 17 Page to direct Internet users to the CDR Facebook Page, the CDR Site, and the 18 CDP Site, and receive advertising revenue when users are directed to these sites.
- On information and belief, Defendant Gravitas is undercapitalized 49. and is an alter ego of Defendants Powell, Shilov, and Khachaturian, such that it 22 would be unjust to treat it as a separate entity from these individual Defendants.
 - 50. On information and belief, Defendant SCMA is undercapitalized and is an alter ego of Defendants Powell, Khachaturian, and Yang, such that it would be unjust to treat it as a separate entity from these individual Defendants.

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5.0 FIRST CLAIM FOR RELIEF

Violation of NRS 597.770 – Right of Publicity

- 51. Plaintiff hereby incorporates the allegations of each of the preceding paragraphs as if set forth fully herein.
- 52. Defendants used Ms. Hunter's name, photograph, and likeness on the Hunter Facebook Page and the CDP Site.
- 53. Defendants used, and continue to use, Ms. Hunter's name, photograph, and likeness without Ms. Hunter's permission.
- Defendants used, and continue to use, Ms. Hunter's name, 54. 10 photograph, and likeness for the purpose of commercial gain by directing users 11 to the CDR Facebook Page, the CDR Site, the CDP Site, and the 12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 13|| from this Internet traffic and revenue from Defendants' sale of goods and 14 services on these web sites.
 - 55. Defendants' use of Ms. Hunter's name, photograph, and likeness constitutes a commercial use under NRS 597.770.
 - 56. Defendants' conduct violates Ms. Hunter's statutory right of publicity under NRS 597.770.
- Defendants knew they did not have permission from Ms. Hunter to 57. use her name, photograph, and likeness in this manner, or indeed in any Defendants had actual knowledge that Ms. Hunter's name, manner. 22 photograph, and likeness were used without her permission.
- Ms. Hunter has suffered damages as a result of Defendants' 58. conduct in excess of \$15,000, and is entitled to recover her actual damages and an award of punitive damages against Defendants, as well as injunctive 26 relief preventing Defendants from using Ms. Hunter's name, photograph, or likeness in this manner.

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6.0 SECOND CLAIM FOR RELIEF

Violation of Wash. Rev. Code Ann. § 63.60 – Right of Publicity

- 59. Plaintiff hereby incorporates the allegations of each of the preceding paragraphs as if set forth fully herein.
- Defendants used Ms. Hunter's name, photograph, and likeness on 60. the Hunter Facebook Page and the CDP Site.
- 61. Defendants used, and continue to use, Ms. Hunter's name, photograph, and likeness without Ms. Hunter's permission.
- 62. Defendants used, and continue to use, Ms. Hunter's name, 10 photograph, and likeness for the purpose of commercial gain by directing users 11 to the CDR Facebook Page, the CDR Site, the CDP Site, and the 12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 13|| from this Internet traffic and revenue from Defendants' sale of goods and 14|| services on these web sites.
 - Defendants' use of Ms. Hunter's name, photograph, and likeness 63. constitutes a use under RCW 63.60.050.
 - Defendants' conduct violates Ms. Hunter's statutory right of 64. publicity defined in RCW 63.60.010.
 - 65. Defendants' use of Ms. Hunter's name, photograph, and likeness was intended to promote Defendants' CDR Facebook Page, the CDR Site, the CP Site, and com> web site.
- Defendants knew they did not have permission from Ms. Hunter to 66. use her name, photograph, and likeness in this manner, or indeed in any Defendants had actual knowledge that Ms. Hunter's name, 24|| manner. photograph, and likeness were used without her permission.
 - Ms. Hunter has suffered damages in excess of \$15,000 as a result of 67. Defendants' conduct, and is entitled to recover her actual damages and

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Defendants' profits from their use of her name, photograph, and likeness, as well as injunctive relief preventing Defendants from using Ms. Hunter's name, photograph, or likeness in this manner.

7.0 THIRD CLAIM FOR RELIEF

Common Law Misappropriation of the Name and Likeness of Another

- Plaintiff hereby incorporates the allegations of each of the 68. preceding paragraphs as if set forth fully herein.
- Defendants misappropriated Ms. Hunter's name, picture and 69. likeness. Ms. Hunter did not permit Defendants' use, and did not want her 10 name, picture, and likeness used in this manner.
 - Defendants used Ms. Hunter's name, picture and likeness for 70. advertising their commercial products and other commercial purposes.
 - Defendants misused Ms. Hunter's name, picture, and likeness for 71. both monetary gain and to spread a conservative political message that is contrary to Ms. Hunter's own beliefs.
 - 72. Ms. Hunter has suffered mental anguish as a result of Defendants' use of her name and picture as a spokesperson for a fake news web site, which has caused damage to Ms. Hunter in excess of \$15,000.

FOURTH CLAIM FOR RELIEF 8.0

False Light

- 73. Plaintiff hereby incorporates the allegations of each of the 22 preceding paragraphs as if set forth fully herein.
 - Defendant placed Ms. Hunter in a false light by using her name, 74. photograph, and likeness to transform her into a spokesperson for a radical right-wing web site that peddles fake news.
 - Ms. Hunter is not a conservative, much less an extreme right-wing 75. conservative, nor is she a dishonest ideologue.

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- The false light in which Defendants' actions have cast Ms. Hunter is 76. extremely offensive to a reasonable person, as no reasonable person would wish or expect to become a spokesperson against their will for false political propaganda that is incompatible with their own beliefs.
- Defendants have cast Ms. Hunter in this extremely offensive false 77. light to at least the hundreds of thousands of followers of the Hunter Facebook Page, as well as Internet users arriving at the CDP Site by other means.
- Defendants' actions have caused Ms. Hunter emotional and 78. psychological harm, resulting in damages to Ms. Hunter in excess of \$15,000.

9.0 FIFTH CLAIM FOR RELIEF

Violation of Common Law Right of Publicity

- 79. Plaintiff hereby incorporates the allegations of each of the preceding paragraphs as if set forth fully herein.
- Ms. Hunter is a public figure because she is a successful actress, 80. model, and beauty pageant winner.
- 81. Defendants have used Ms. Hunter's name and identity for the commercial purposes of using her as a spokesperson for a conservative, fake 18 news website, thereby increasing the popularity and advertising revenue of Defendants' sites.
- Ms. Hunter has suffered economic loss in excess of \$15,000 as a 82. result of Defendants' actions, as they have made her less attractive to potential 22 business clients.

10.0 PRAYER FOR RELIEF

WHEREFORE, Plaintiff Laura Hunter hereby prays for relief as follows:

A preliminary and permanent injunction enjoining Defendants from using Plaintiff's name and photo on any social media platform or web site without her permission;

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- B. Compensatory damages in an amount to be determined at trial;
- C. Defendants' profits from their use of Ms. Hunter's name, photograph, and likeness, in an amount to be determined at trial;
 - D. Punitive damages in an amount to be determined at trial;
 - E. An award of attorney's fees and expenses; and
 - F. Such other relief as this Court deems proper.

11.0 JURY TRIAL DEMAND

Plaintiff demands a jury trial on all issues to which the right to jury attaches.

12.0 ARBITRATION EXEMPTION REQUESTED

The total of Plaintiff's claims herein, exclusive of interests and costs, which the judge and/or jury is likely to award, exceeds \$50,000. Accordingly, it is exempt from arbitration and Plaintiff requests that exemption. Nev. Arb. R. 3(A).

Dated: February 21, 2017. Respectfully Submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

Marc J. Randazza (NV Bar No. 12265) Alex J. Shepard (NV Bar No. 13582)

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Email: ecf@randazza.com

Attorneys for Plaintiff, Laura Hunter

| 1 | IAFD | | | | | | |
|----------|--|-----------------------------------|--|--|--|--|--|
| 2 | Marc J. Randazza (NV Bar No. 12265) | | | | | | |
| 3 | Alex J. Shepard (NV Bar No. 13582) 3 RANDAZZA LEGAL GROUP, PLLC | | | | | | |
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| 7 | Attorneys for Plaintiff, | | | | | | |
| 8 | Laura Hunter | | | | | | |
| 9 | EIGHTH JUDICIAL | DISTRICT COURT | | | | | |
| 10 | CLARK COUNTY, NEVADA | | | | | | |
| 11 | LALIDA HIINITED an Individual | L Casa No : | | | | | |
| | LAURA HUNTER, an Individual, Plaintiff, | Case No.: Dept. No.: | | | | | |
| 13 | VS. | Depi. No | | | | | |
| 14 | MICHAEL POWELL, an individual; | INITIAL APPEARANCE FEE DISCLOSURE | | | | | |
| 15 | GRAVITAS ADVERTISING CORP., a | | | | | | |
| 16 | Nevada corporation; SCMA HOLDING INC., a Nevada corporation; STANLY SHILOV, an individual: | | | | | | |
| 1/ | STANLY SHILOV, an individual; CHRIS KHACHATURIAN, an individual; MENG YANG, an individual; JOHN DOES | | | | | | |
| 18 | MENG YANG, an individual; JOHN DOES 1-10; and ROE CORPORATIONS 11-20, | | | | | | |
| 19 20 | Defendants. | | | | | | |
| 21 | /// | | | | | | |
| 22 | | | | | | | |
| 23 | /// | | | | | | |
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INITIAL APPEARANCE FEE DISCLOSURE

Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted for parties appearing in the above entitled action as indicated below:

LAURA HUNTER \$270.00

TOTAL REMITTED: \$270.00

Dated: February 21, 2017. Respectfully Submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

Marc J. Randazza (NV Bar No. 12265) Alex J. Shepard (NV Bar No. 13582)

4035 S. El Capitan Way Las Vegas, Nevada 89147

Tel: 702-420-2001

Email: ecf@randazza.com

Attorneys for Plaintiff, Laura Hunter

26

27

EXHIBIT 1

February 21, 2017 "Laura Hunter" Google Search



laura hunter

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Laura Hunter | Facebook

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Laura Hunter, 930045 likes - 290475 talking about this, Blogger & Activist In Support Of President Donald Trumpi

Laura Hunter, Author at Conservative Daily Post

https://conservativedailypost.com/author/laura-hunter/ *

Laura Hunter is a well-known blogger and political activist known for her constant stream on Facebook. She has been in the reporting and journalism world for ...

Images for laura hunter















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Report images

LAURA GROUSSMAN HUNTER - Biography - Faculty Profile - The ...

https://faculty.utah.edu/u0072140-LAURA_GROUSSMAN_HUNTER/.../index.hml v LAURA GROUSSMAN HUNTER portrait. Chief Operating Officer, Utah Education and Telehealth Network; Adjunct Associate Professor, Educational Psychology.

Laura Hunter | RSA Conference

https://www.rsaconference.com/speakers/laura_hunter >

Principal Solutions Architect - Microsoft IT, Microsoft Corporation. Laura Hunter is a Principal Solutions Architect for Microsoft IT's Identity & Access Management ...

Laura Hunter (@LauraHunterCDR) | Twitter

https://twitter.com/laurahuntercdr?lang=en 💌

The latest Tweets from Laura Hunter (@LauraHunterCDR). Conservative News Journalist, Las Vegas, $M\!M$

Laura Hunter (@LRHunter4) | Twitter

https://twitter.com/lrhunter4?lang=en >

The latest Tweets from Laura Hunter (@LRHunter4). Head of Communications at @Coventry_City FC | Former Crystal Palace | Views owned, St Albans,

Laura Hunter, PhD | Diversity & Inclusion

diversity.arizona.edu/laura-hunter-phd *

Zanetti, Mary, An Dinh, Laura Hunter, Michael A. Godkin, and Warren Ferguson. 2014. "A Longitudinal Study of Multicultural Curriculum in Medical Education.

Laura Hunter I Office of the Provost

provest.arizona.edu/laura-hunter 🕶

Laura Hunter, Provost's Office - Executive Office of the President - Provost's Council - Academic Affairs -Faculty Affairs - Deans - Schools & Colleges, ANDREW

Laura Hunter Shibori

www.dyepots.com/ *

Laura Hunter creates silk shibori scarves and shawls for sale at retail locations throughout the United

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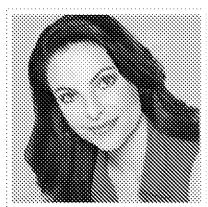
EXHIBIT 2

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Laura Hunter @LauraHunterCDR

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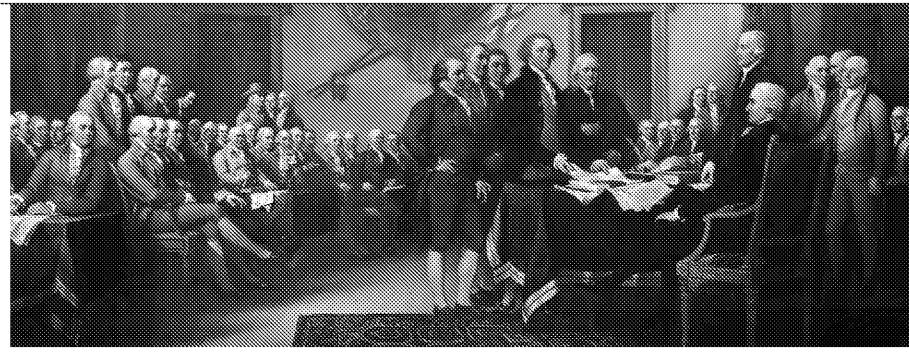
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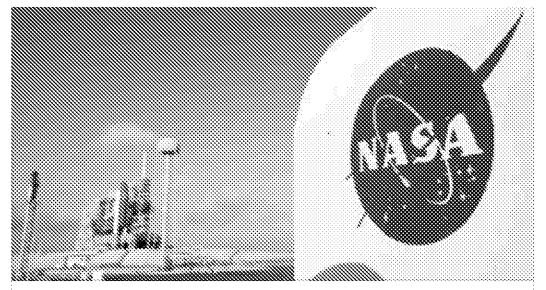
Laura Hunter

Message

4 mins -

It looks like America is about to once again lead the world in space exploration!

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Senate Rules: NASA Global Warming Research To Stop Immediately, Instead Fund Space Exploration CLICK HERE

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Debra Adair McKee, Dave Landgren, Lucy Meglio and 14 others like Top Conthis



Judie Hall Does this mean Al Gore is out of a job since his federal funding is gone?

2 · 3 mins



Laura Hunter

14 mins ·

Full Story: https://goo.gi/O7eVHt



Blogger

Blogger & Activist In Support Of President Donald Trump!



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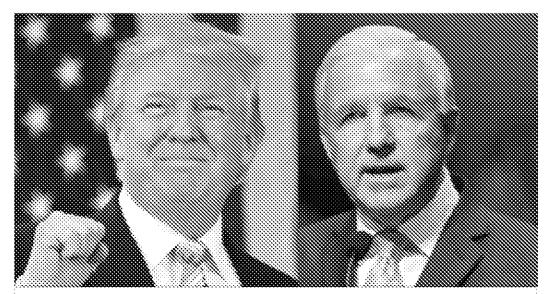
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Rudy Maestas, Shirley Kelly, 'Darrell Henley and 3 others like this.



Laura Hunter 32 mins -

Looks like they just learned President Trump isn't playing Obama's games.



Sanctuary City Just Humiliated, Democrats Ask For Forgiveness As Federal Funding Reallocated

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CONSERVATIVEDAILYPOST.COM

Sally Carrasco Vega, Teresa Pfaff, Davey Jones and 265 others like **Top Comments**

45 shares



Pamela Sue Trump trying to do what he promised his voters but he has a ton of opposition in the media, Democrats, Rinos like McCain and Lindsay Graham. Plus Congress takes a ton of time to pass laws and Trumps staff still not in place cuz of obstructionist Demoncrats

1 - 10 mins



Don Schleich These santuary cities are BREAKING FEDERAL LAW! What is the problem here liberals or do you still think you are all above it?

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Laura Hunier

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Eva Burnham sen mocain is a perfect example of a yes man, he is in politics not only because he is not competent to do anything else, but to steal from the american people and the only way to accomplish this goal is to be decietful and sneaky, he is a liar and a f... See More

8 - 1 hr

1 Reply



Robert Magnante He needs to go and honestly a perfect example of why we need term limits. No bull shit and btw i trust his traitor ass as much as i trust a Bundy at the dinner table. Time for term limits and benefits

5 · 46 mins

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Laura Hunter

The left refuses to stop with their protests and acts of defiance.



238 Congressmen Now Forced To Cancel Town Halls Across Country Following Chaffetz Incident

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Mary Boehm, Rebecca Reed Overholtzer, Scott Glendenning and 22 others like this.

Top Comment

25 shares



Shirley McCray No sense holding a Town Hall, they've been infiltrated by the likes of moveon.org and others that only want to disruprt, be rude and silence the speaker. Unfortunate, since it silences the community also. We are used to being the "Silent Majority" though, so we'll just plunge ahead and go to work.



MoveOn.Org | Democracy In Action

MoveOn is a community of more than 8 million Americans from all walks of life who use innovative technology to... FRONT MOVEON CRG

8 - 1 m

3 Replies - 56 mins



Cynthia Denise Republicans are a bunch of punks. I'm never voting for another Democratic in my life because they screwed up country with all of these migrants and illegals. Republicans are wimpy. We need a third party in this country.

4 - 1 hr

5 Replies - 19 mins

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Laura Hunter

17 hrs

Dozens of workers just learned the hard way!



Day Of Immigrants Backfires, Protesters Return The Next Day And Receive A Lesson In Entitlement CLICK HERE

CONSERVATIVEDAILYPOST.COM

Like Comment Share

Paul Gonyea, Joyce Bertsche, Baldernar Villarreal and 292 others like Top Comments this.

32 shares



Jacque Watkins Nothing changed. No impact on anything...people still ate, schools still held classes, work went on as usual....

It did show ICE the businesses who are breaking the law and hiring illegal aliens, it did show ICE who they are, it did show ICE which sch... See More

19 · 17 hrs

1 Reply



Aaron Cox Illegals shouldn't of had the job in the first place . With all the out of working America citizens looking for a job.

21 - 17 hrs - Edited

View more comments

2 of 70



Laura Hunter

18 nrs

FBI Director Comey gives announcement!



FBI Makes Trump Announcement On The Eve Of 3 New Investigation Probes

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CONSERVATIVE DAILY POST COM

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Will Richardson, Paul Stone, Odile Melancon and 145 others like this. Top Comments

37 shares



Arthur Lang Hillary's private Email SERVER made it easy for any Enemy, Foreign or domestic to HACK; ABSOLUTE STUPIDITY, IGNORANCE (and to think that some people actually still Voted for her)

7 - 13 hrs



Robert F Baptista Someone commented, why isn't Sharpton in jail for tax evasion. Why aren't the IRS bosses in jail for that million SSNs that illegals have been using to siphon off our tax dollars? Why are these Obuttplug followers allowed to conspire against our government? Why isn't Hitlery and Chelsea being indicted for pay-for-play?

5 - 14 hrs

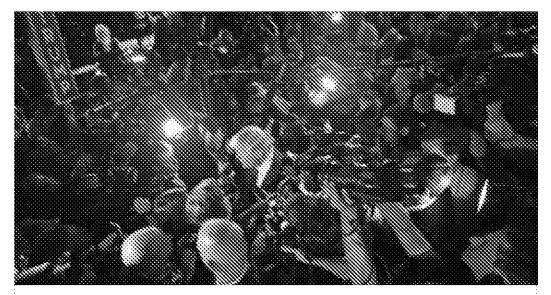
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Laura Hunter

Busted!



BREAKING: Wikileaks Releases Evidence To Confirm Mass Media Is Hiding Crisis To Lie About Trump CLICK HERE

BREAKING NEWS 1 BY JON CHAMBERS

Like Comment Share

Ken JT Justin Taylor, Dave Huelskamp, Mila Czech and 1,006 others — Top Comment like this.

611 shares



Tom Bullard Sooo...Sweden has Fake News too, huh? Again, a government AND the media covering up the truth. Like Germany....And France....And the U.K. They've all made a very bad decision, and are in denial about it. Their citizens are paying the price.

24 · 16 hrs

3 Replies



Mariafranca Venuto Favillo My family and friends in Europe are frightened and are afraid to walk their own streets due to these refugees(mostly men). They are out of control. They are ruining the cities and don't socialize with anyone other than their own.

14 - 16 hrs

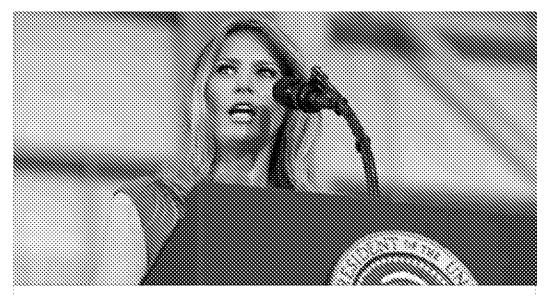
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Laura Hunter

18 hrs

Why must they stoop this low?



First Lady Melania Now Being Torn Apart By "Tolerant" Left For Her Act Of Sincerity

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Paul Stone, Margaret Lagace, Lloyd Cannon and 55 others like this.

Top Comments

17 shares



Gloria Crawford Hope our first lady knows we the people love her. The far left winger liberals hate everybody. Just frothing at the mouth....jealous.... Hang in there...ignore the liberal fools, not smart enough to be any different.

27 - 17 hrs - Edited

1 Reply



Stanley Phipps If she had killed a baby instead of say the Lords Prayer, the insane left would have worshiped her. Liberalism a severe mental disorder.

35 - 18 hrs

View more comments

2 of 94



Laura Hunter

18 hrs



11K Views

Joe Marek, Vera Braun, Joan Galkowski and 348 others like this.

136 shares



Angel B. Crow Nobodies bitter or saying that they don't believe in democracy. In fact the real reason people are upset is because we don't really have a democracy, just the illusion there of.

2 hrs - Edited

3 Replies - 27 mins



Mike GeneAnne Klugger Get a job! Liberals are reientless!!!! You protest because you have nothing to do all day! So you protest all the time and for what because you don't like our President! Too bad we do

2 - 17 hrs

View 39 more comments



Laura Hunter

Illegals now being deported claim they are "shocked" and "innocent" of crime.



Illegals Now In "Shock" As Deportations Happen, Claim They Are Innocent And Have No Idea Why CLICK HERE

CONSERVATIVEDAILYPOST.COM + BY MATTHEW BERNSTEIN

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Brian Freehan, Marsha Mertzweiller Runnels, Patrick Cubler and 648 Top Comments others like this.

385 shares



Bob Turner It's simple. Now pay attention, I don't want to confuse anyone here
The very moment your foot (only one) set foot across the border without a visa Bob Turner It's simple. Now pay attention, I don't want to confuse anyone here. or entry clarification, to set up residence in this country you were guilty of a felony. One of our vets inadvertently strayed into YOUR country and sat in YOUR jail for over a year.

195 · 18 hrs · Edited

14 Replies · 1 hr



James Stueckle Ok, here it is....if you came to the united states illegally, you broke the law. If you are here illegally, you are not a citizen and therefore have no rights under the constitution. No lawyer even if you can pay. You are entitled to 1 thing, a one way trip back to your country. Be happy that we land the plane.

99 - 18 hrs

8 Replies - 8 hrs

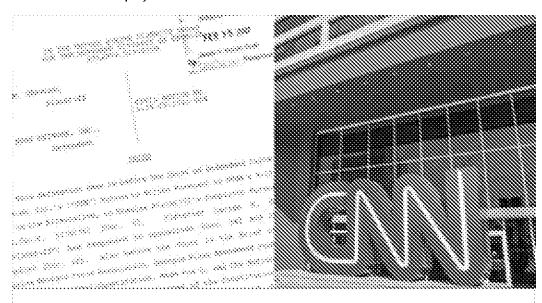
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2 of 404



Laura Hunte

CNN is about to pay for their lies and defamation!



CNN In Code Red: Federal Judge Rules Network Used Fake News To Bring Malice On Whistleblower

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CONSERVATIVEDAILYPOST.COM

Like Comment Share

.....

Colleen Pohl, Russ Pagen, Nancy Butler Garcia and 1,211 others like — Top Comments this.

478 shares



Cindy Kohn Have beyontted CNN for a long time. I hope they sue and win. They have been out of control with no consequences. Boycott. Do not watch. Liars!!

18 · 17 hrs



Bob Peterson Yeah, Leonard Beaty, LOOK WHAT HAPPENED IN SWEDEN. Muslims have all but taken over the country at the invite of the liberal government. Check it out for yourself instead of idiotically following the liberal MSM!

20 - 18 hrs

4 Replies

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Laura Hunter

She meant every word she said...



Woman Drops College With A Bold Promise To ISIS... Using A Sniper Rifle, She Keeps Her Word CLICK HERE

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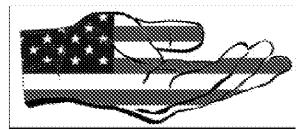
Jack Hunsinger, Rex Weimer, Huck Huddleston and 464 others like this

Top Comments

91 shares



Kenneth Evans Now she's the kind of person I'm warmly WELCOME to come live in our country!!! :-DDD



16 - 18 hrs



Herman Vogel Hey Meryl Streep, THIS is a REAL woman, she puts her LIFE were her MOUTH is...learn something here.

8.3 hrs

View 18 more comments



Laura Hunter

19 hrs

This is awesome, but talk about embarrassing for Don Lemon!



WATCH: CNN Host Forced To Shut Down Live Show, As Guest Exposes Their Fake News On The Air CLICK HERE

CONSERVATIVEDAILYPOST.COM | BY MATTHEW BERNSTEIN

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Comment

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Joan Bodenheimer Keedy, Valerie Kinsey, Sally Watson and 312 others like this.

Top Comments

116 shares



John Littlefield Don Lemon is a fraud. He is not a news man, he is a liberal actor playing a role. His role is to play the part of a real news person, but instead of providing actual news, he spreads propaganda and lies that are specifically crafted by the Obama forc... See More

38 · 18 hrs



Dwight Vogel LMAO.....Donny BOY is as fake as you can get. Look out liberals you are only going to get away with your "fake news" for so long. OOPS I guess you have already been called out on it. There went Lemon with his tail between his legs.

27 · 18 hrs

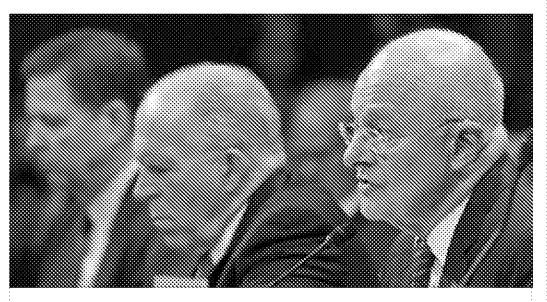
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Laura Hunter 19 hrs -

Judicial Watch confirms!



CIA, NSA, & FBI Now Getting Sued As Flynn Walks Free CLICK HERE

CONSERVATIVEDAILYPOST.COM

Like Comment Share

Top Comments

Charlotte Hicks, Kris Darby, Dan Pereira and 659 others like this.

215 shares



Guillermo Martinez There is a cover up, they do not want Flynn investigated because he might implicate the others involved. People are not seeing through this they are looking the other way. Flynn knows something and they are protecting him.

8 · 17 hrs

6 Replies - 5 hrs



Sandra Links I'm an avid Trump supporter, but this article is full of "take news". Flynn was fired because he lied to Mike Pence. The transcripts of the phone calls haven't been released. We do not know what was said.

16 - 19 hrs

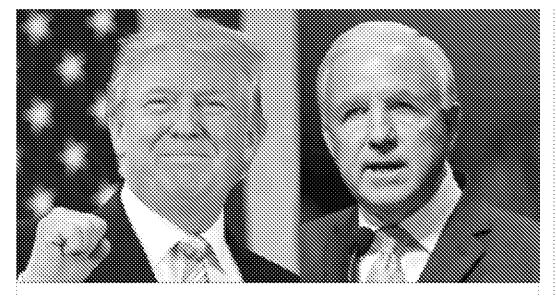
2 Replies

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Laura Hunter

That sure was fast! Looks like they learned President Trump isn't here to play their games.



Sanctuary City Just Humiliated, Democrats Ask For Forgiveness As Federal Funding Reallocated CLICK HERE

CONSERVATIVEDAILYPOST COM

ike

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Ronda Amos, Ingrid Hollywood, Chip Wyckoff and 1,420 others like this

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345 shares



Jimmy Mitchell The Democratic Party has become the most catastrophic failure since Abraham Lincoin was in office. All indications are it will implode and destroy itself within the next four years. It's clear it was supported by enemies of the state and it is clear that Middle Eastern money and Chinese money almost destroyed the United States and its founding culture. Thank God for Donald Trump and the intelligence of the heartland!

63 - 19 hrs

2 Replies - 9 hrs



Richard Mitchell if that was california do not give them money have them give a bill pay that bill only to repair the dam do the same thing , then have them defund every fking program for the illegals then they would have money , check all votes casted for the governor and you will find that voter fraud using illegals is what got him elected then replace him

42 - 19 hrs

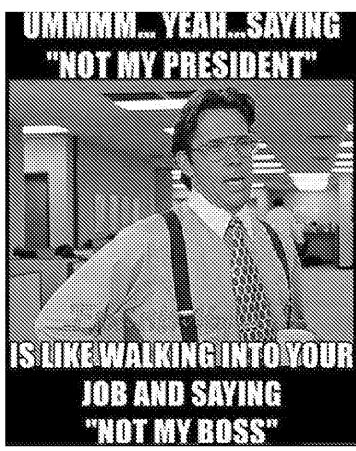
4 Replies

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2 of 55



Laura Hunter added a new photo.



Like

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> Edward Trusnovic, Daniel Ball, Theresa Barker and 5,304 others like this.

Top Comments

3,345 shares



Morgan Bradley Loganbill Only problem is, the morons saying this don't have a job...liberal, democrats, on welfare.

51 - 20 hrs

7 Replies - 1 hr



Gloria Crawford These people, liberals don't have a job and don't want one. Guess they are proud of themselves living off working people. They would have to have a bottle or pacifier and find a corner if they are made to get a job. Always finding a corner if boss gave an order.

6 - 13 hrs - Edited

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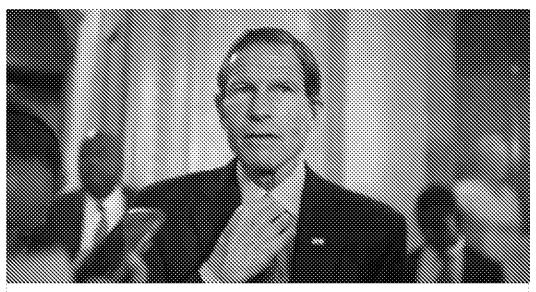
2 of 105



Laura Hunter

20 hrs

He should be ashamed!



14 Vietnam Veterans Come Forward, Senator Blumenthal Exposed In Case Of Stolen Valor

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Mark Sr Rivera, Norm Snowbarger, Paul Filipelli and 1,846 others like Top Comments this.

1,061 shares



Robert Carroll How about Kerry. He refused a direct order. Refused to take a river gun boat out. He was relieved of his unit, sent home. Because of his wife's being heir to the Heinz corporation, he was discharged to civilian life. He then went on the floor of the Senate and protested the War. He ripped his Military ID up in front of the forum. Nice, huh.!!! Birds of a feather flock together.

80 - 19 hrs - Edited

12 Replies - 1 hr



Charles Giarraputo I remember when this first came out when he was running for the Senate. He was at a VFW hall and he had a dozen VIET NAM VETS. behind him backing him for the Senate knowing he lied about his military lies. That's all you need to know about LIBERALS. BACK STABBING SCUMBAGS.

59 - 19 hrs

1 Reply

View more comments

.2 of 255



Laura Hunter

20 hrs

Full Story: https://goo.gi/GMJ0Z3



7.5K Views

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Brian Goad, Ken Wolf, John Crawford and 36 others like this.

4 shares



John R. Wallace Screw these criminals and traitors. Put them in jail.

1 - 16 hrs



Bill Clark I'm lost.. anyone want to fill me in on what this means?

2 Replies - 3 hrs



Laura Hunter

Mattis taking a strong stand with the U.S. Military!



JUST IN: Mattis Deploys Warships To South Sea, Defying China's Latest Order To Control Entire Area CLICK HERE

CONSERVATIVE DAILY POST COM

Comment Share

Marva J Morris, Charles Manning, Caleb Rust and 1,575 others like

264 shares



Martin D Regis Yep no longer is there a Kitty in the White House and other Branches of Government,, Whole new ball game,, love it

23 - 20 hrs

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EXHIBIT 3

CDP Site Laura Hunter "Biography" Page



ABOUTUS BEEANING NEWS STATES RIGHTS AMERICAN STRENGTH NATIONAL SECURITY USERAL CORRUPTION AECHIVE C

Laura Heeter

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Biography

Laura Hunter is a well-known biogger and political activist known for her constant stream on Facebook. She has been in the reporting and journalism world for almost two decades and has witnessed countless elections and large propositions come and go. Currently, her passion lies with grass-roots movement within America that look to put the Bill of Rights back on its rightly throne.

Laura Hunter is single and enjoys living with her dog in Eastern Tennessee. When she isn't writing or looking to spread the word about true Patriotism, she enjoys hiking and camping with friends and family.

🖋 Pollow Laura Henter

Tragic: Rest In Peace Drew

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She Was Called The Most Beautiful Girl In The World

Beautiful Giant Shocks Beach Goers. She Actually Exists

Tragic: R.I.P Antonio





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Tragic: Rest In Peace Drew

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Nancy Kerrigan Was Gorgeou The 90s, Now She Left Us Jaw Dropped

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Do You Come from Royal Bloc

She Was Called The Most Beautiful Girl In The World

Beautiful Giant Shocks Beach Goers. She Actually Exists

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Conservative Daily Post

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Las Vegas, Nevada 89146

Telephone: 9037485869

Fax: 90374858697

Email: contact@conservativedailypost.com

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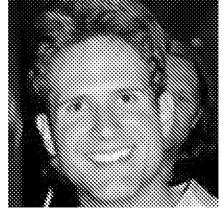
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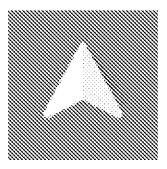
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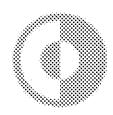
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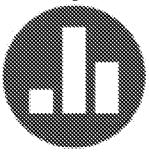
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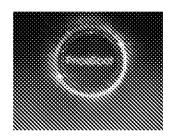
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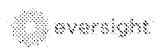
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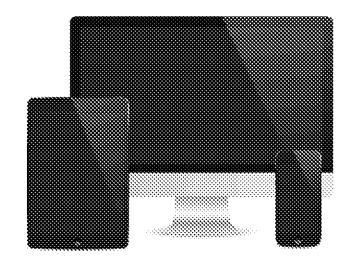
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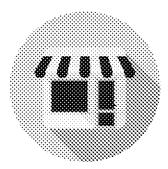
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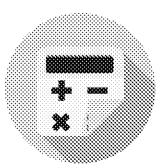
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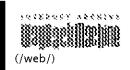


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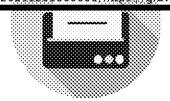
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Great Technology

Gravitas Works uses the latest technologies to power our applications.

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A team of dreamers that are always pushing the limits of whatever we do.

About Us

We've been in operation in Las Vegas since 2013 successfully building products. Every month we grow faster and faster and progress towards our goals. The key to maintaining this growth is assembling the best team possible.

Skills

Gumption

Work Ethic

Creativity

Motivation

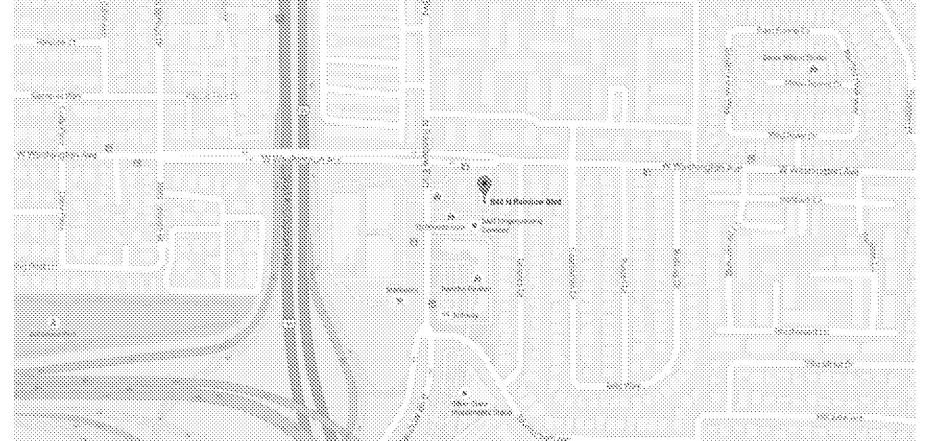
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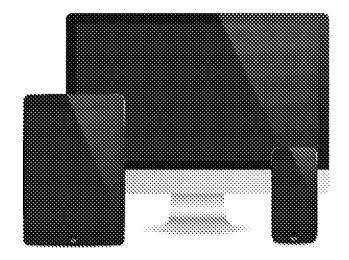
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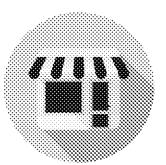
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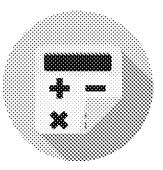
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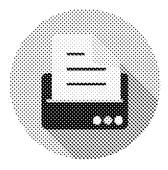
Full Control

We control customer experiences from start to finish.



Big Data Optimization

Using big data is important in optimization but it's important to know how to not get caught up in the numbers. Application is key.



Great Technology

SCMA Holding uses the latest technologies to power our applications.

Who We Are?

A team of dreamers that are always pushing the limits of whatever we do.

About Us

We've been in operation in Las Vegas since 2013 successfully building products. Every month we grow faster and faster and progress towards our goals. The key to maintaining this growth is assembling the best team possible.

Skills Gumption Work Ethic Creativity Motivation

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