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David W. Slayton,
Executive Officer/Clerk of Court,
By M. Webb, Deputy Clerk

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF LOS ANGELES**

14 JANE DOE,

15 Plaintiff,

16 vs.

17 YEEZY, LLC; "YE," formerly known
18 as KANYE WEST; and DOES 1 to
19 100, inclusive,,

20 Defendants.

Case No.: 25STCV03802

**DECLARATION OF MILO
YIANNOPOULOS IN SUPPORT OF
DEFENDANTS' SPECIAL MOTION TO
STRIKE [C.C.P. § 425.16]**

Assigned for All Purposes to:
Judge Theresa Traber
Department 47

Action Filed: 2/11/2025
Trial Date: Not Set

21 **DECLARATION OF MILO YIANNOPOULOS**

22 I, Milo Yiannopoulos, declare:

23 1. I was employed as Chief of Staff for Defendant Yeezy, LLC ("Yeezy") during the
24 relevant period alleged in the Complaint filed by Plaintiff Jane Doe, a position equivalent to
25 Chief Executive in most other organizations. I have personal knowledge of the facts stated herein
26 and, if called as a witness, I could and would competently testify thereto.

- 1 -

DECLARATION OF MILO YIANNOPOULOS IN SUPPORT OF DEFENDANTS' SPECIAL
MOTION TO STRIKE

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1 marketing services in connection with Ye’s artistic projects, including the promotion of the
2 Vultures Vol. 1 album and associated creative works. Plaintiff’s engagement was focused
3 exclusively on the external promotion and public positioning of Ye’s artistic expression.

4 7. Plaintiff presented herself as a publicist capable of navigating and amplifying
5 controversial artistic messaging. She voluntarily agreed to assist in the promotion of Ye’s work,
6 fully aware of his longstanding and worldwide-known reputation for provocative and boundary-
7 challenging expression. In other words she was not only aware of Ye’s current philosophical and
8 artistic predilections and preoccupations, but she did know and must have known about his
9 personal habits, personality, working style and immersive, twenty-four hour approach to his
10 creative endeavors, because these have been the subject of scrutiny, commentary, imitation and
11 inspiration for the music and fashion industries for the entire length of her professional life,
12 during which she has been primarily retained by artists in the genres most adjacent to Ye: rap
13 and hip hop.

14 8. No promises, representations, or guarantees were made to Plaintiff regarding long-term
15 employment, permanent affiliation with Yeezy, or any particular conditions or terms of
16 engagement beyond the promotion of Ye’s creative works. The nature of her involvement was
17 informal and tied directly to specific marketing tasks associated with Ye’s artistic projects.
18 Indeed, the company did not even knowingly or purposefully seek her out, interview her or hire
19 her: She was initially retained without my knowledge as a subcontractor by one of our larger
20 vendors.

21 9. Based on my personal knowledge, any individual performing public relations services at
22 Yeezy during this time—including Plaintiff—would have understood that the sole purpose of the
23 enterprise was to support and promote Ye’s artistic vision. The environment was not a traditional
24

1 corporate setting, but a highly unusual and fluid environment, an extension of Ye’s creative
2 process, designed to prioritize his uncompromising expressive freedom.

3 10. Throughout Plaintiff’s involvement with Yeezy, the projects she worked on—including
4 the Vultures Vol. 1 album and related initiatives—were consistent with Ye’s public artistic
5 persona and mission, which were and are widely known to be provocative, controversial, and
6 challenging of societal norms. Plaintiff would have had extensive knowledge of Ye’s methods,
7 style, reputation, and even personality, owing to her experience representing other artists in the
8 hip hop an rap genres, where Ye’s art and Ye himself have been the dominant and most widely
9 discussed and dissected creative influence for more than two decades.

10 11. I personally observed that Ye’s statements, directives, and creative projects, even when
11 provocative or offensive to some audiences, were integral to the creation, rehearsal, promotion,
12 or defense of his broader artistic message. Ye’s conduct, including his communications and
13 artistic direction, was understood internally as part of his artistic process. Indeed, almost anyone
14 who has spent time in the music business will be familiar with his habits, mannerisms and
15 communication style, because he is the most famous and successful artist currently living, and
16 consequently everything around him, including text messages, is prone to leaking.

17 12. It is my professional opinion based on personal observation that the conduct described by
18 Plaintiff in her Complaint—including the text messages and directives she references—was
19 consistent with the known and understood artistic purposes of Yeezy and Ye’s broader cultural
20 mission, and that she knew what form interaction with the artist was likely to take before, during
21 and after the many solicitations designed to secure for herself a handsomely remunerated senior
22 communications job at Yeezy.

23 13. I personally observed Plaintiff regularly use a form of speech sometimes referred to as
24

1 "Ebonics" in her interactions with others while working in connection with Yeezy projects. This
2 included the adoption of vernacular, slang, and cadence typically associated with African-
3 American urban culture, despite Plaintiff not to my knowledge being raised in nor personally
4 identifying with that community. Plaintiff's use of this stylized speech appeared performative
5 and sometimes inconsistent. It was remarked upon by other team members that during interviews
6 Plaintiff would "wander in and out of the blaccent."

7 14. It was understood within the company, because Plaintiff herself shared the fact, that
8 Plaintiff frequently wore wigs that had the effect of varying her appearance dramatically, since
9 the wigs differed widely in style and color, and that she would adopt vastly different "looks"
10 from one day to the next. Indeed, she voluntarily discussed her extensive wig collection with me
11 and even sent photographs of her "wig room." In my capacity as chief executive it occurred to
12 me that this disorientating habit of adopting different hairstyles, accents, styles of dress and other
13 affectations was a ploy for attention and sometimes temporary advantage with colleagues and
14 that it might become a cause for concern.

15 15. At no time during Plaintiff's involvement with Yeezy or during any professional or
16 informal interaction while she enjoyed some form of engagement by the company did she ever
17 represent herself to me—or, to my knowledge, to anyone at Yeezy—as being Jewish. I was not
18 aware of any religious affiliation on her part, and no behavior, comment, or identifying marker
19 gave any reasonable indication that she observed or claimed Jewish identity.

20 16. To the best of my knowledge and based on internal communications, schedules, and
21 project records, Ye never met Plaintiff in person. I do not believe there is any disagreement on
22 this fact. Plaintiff's interactions with the company were limited to remote communications,
23 including group messages, email, and virtual meetings. Consequently, Ye would have had no
24 opportunity to make any personal sensory observation regarding Plaintiff's physical presence,

1 including her scent. Any comments attributed to Ye about Plaintiff's alleged body odor were, in
2 my professional opinion and according to her own repeated statements to me that she had never
3 met Ye, stylistic hyperbole consistent with his artistic persona and not based on any factual basis
4 or direct interaction.

5
6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct.

8
9 Executed on this 28th day of April 2025 at 10AM in Washington, DC.

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13 _____
MILO YIANNOPOULOS