

**IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA
IN AND FOR DADE COUNTY, FLORIDA
CIVIL DIVISION**

JEAN-LUC BRUNEL

Civil Action No.:

Plaintiff,

vs.

TYLER MCDONALD, TYLER
MCDONALD D/B/A/ YI.ORG

Defendants.

_____ /

VERIFIED COMPLAINT FOR EQUITABLE RELIEF AND DAMAGES

COMES NOW the Plaintiff, Jean-Luc Brunel, by and through undersigned counsel, and sues Defendants Tyler McDonald, and Tyler McDonald d/b/a/ Yi.Org for equitable relief and defamation, and states as follows:

1. Venue is proper in Dade County, Florida as Defendants Tyler McDonald and Tyler McDonald d/b/a Yi.Org do business in Dade County, and Plaintiff Jean-Luc Brunel resides in Dade County, Florida.
2. Florida Statute 48.193(1)(a)(1) ("long-arm") authorizes service on both out-of-state Defendants.
3. Jurisdiction is proper in the Circuit Court as this action seeks relief in excess of fifteen-thousand dollars (\$15,000).

FACTUAL ALLEGATIONS AS TO DEFENDANTS

4. Plaintiff Jean-Luc Brunel ("Brunel") is the owner of a modeling agency known as "MC2 Model Management" ("MC2"). MC2 began operations in October 2005 and has offices in New York, Miami, and Tel Aviv.

5. Defendant Tyler McDonald ("McDonald") is the owner/operator of Yi.Org and also does business as Yi.Org – Defendant Tyler McDonald d/b/a Yi.org ("McDonald d/b/a Yi.Org"). Defendant McDonald resides in the state of Washington. Yi.Org is a website hosting service based in Vancouver, British Columbia, Canada.
6. In about 2009, Yi.org, by and through the actions of its owner, McDonald, began hosting websites that contained hyperlinks that contained blatantly false and extremely disparaging information about Brunel. (Exhibit attached).
7. These links clearly and falsely associated Brunel with illicit escort services in the state of Florida; information which Defendants McDonald and McDonald d/b/a Yi.Org knew, or should have known, was false.
8. These links have damaged Brunel's reputation as an owner of a well-established modeling agency with offices in New York and Miami, MC2 Models.
9. These links have also damaged the reputation of Brunel's modeling agency MC2.
10. The combined damage to the reputation to both Brunel and MC2 has resulted in a significant loss of revenue to MC2, and accordingly, to Brunel.
11. MC2's revenues have fallen to a mere fraction of what they were before the appearance of the links on Yi.Org.
12. Both Defendants McDonald d/b/a Yi.Org and McDonald assisted in the dissemination of the false and negative information that damaged Brunel's reputation and directly caused damages to Brunel and MC2.
13. Brunel continues to own and operate MC2 Models to this day, his name still harmed by the false and negative association with escort services in Florida.
14. Accordingly, Brunel has been severely damaged by information on websites hosted by

Yi.Org, which is maintained, owned and operated by Defendants McDonald d/b/a Yi.Org and McDonald.

15. The information disseminated by the websites hosted by Defendants McDonald d/b/a Yi.Org and McDonald was false and defamatory to the extreme regarding Plaintiff's alleged involvement with escort services in the state of Florida.

16. Defendants McDonald d/b/a Yi.Org and McDonald have made no attempt to clear the name of Brunel with regard to the false and defamatory information disseminated by the websites they hosted.

17. Brunel continues to own and operate MC2 Models to this day, his name never having been cleared from the negative information disseminated by Defendants McDonald d/b/a Yi.Org and McDonald.

18. Brunel has been damaged by the conduct of Defendants McDonald d/b/a Yi.Org and McDonald, and has accordingly retained undersigned counsel to represent him in this matter, and is obligated to pay counsel a reasonable fee for his services.

**COUNT I – EQUITABLE RELIEF FOR LOSS OF BUSINESS AND REVENUE
AGAINST MCDONALD AND MCDONALD D/B/A YI.ORG**

19. The allegations contained in paragraphs 1 through 18 above are re-alleged and incorporated herein by reference.

20. Brunel, through his agency MC2, has lost a significant amount of business revenue because of the actions of Defendants McDonald d/b/a Yi.Org and McDonald set forth above.

21. Brunel has no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business revenue due to the actions of both Defendants.

22. Accordingly, Brunel seeks to become whole by the payment of damages by both Defendants to compensate him for his losses.

WHEREFORE, PLAINTIFF requests judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

**COUNT II – DEFAMATION AGAINST PLAINTIFF BY MCDONALD AND
MCDONALD D/B/A YI.ORG**

- 23. The allegations contained in paragraphs 1 through 22 above are re-alleged and incorporated herein by reference.
- 24. Defendants McDonald d/b/a Yi.Org and McDonald published or caused to be published, false statements about Brunel using their domain hosting service.
- 25. Defendants McDonald d/b/a Yi.Org and McDonald knew, or should have known, that the statements about Brunel were false.
- 26. These published statements were read by the internet users who viewed the false statements.
- 27. Plaintiff's business reputation was severely damaged as a result.

WHEREFORE, PLAINTIFF requests judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

COUNT III – EQUITABLE RELIEF FOR REPAIR OF BUSINESS REPUTATION

- 28. The allegations contained in paragraphs 1 through 27 above are re-alleged and incorporated herein by reference.
- 29. Brunel has also suffered a significant loss of his own business reputation and a loss of his agency MC2's business reputation as a direct result of the actions of Defendants McDonald d/b/a Yi.Org and McDonald.

30. Brunel has no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business reputation due to the actions of both Defendants.

31. Accordingly, Brunel seeks to restore his business reputation, and that of MC2, by the payment of damages by both Defendants to compensate him for his loss of reputation.

WHEREFORE, PLAINTIFF requests judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

/s/ Joe Titone

Joe Titone
Attorney
FL BAR #: 203882
621 S.E. 5th Street
Pompano Beach, Florida 33060

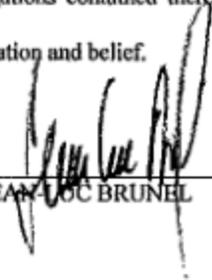


VERIFICATION

STATE OF FLORIDA)
)
COUNTY OF MIAMI DADE)

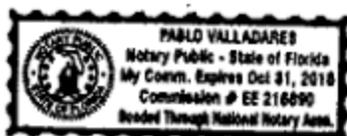
JEAN-LUC BRUNEL, being duly sworn according to law, upon his oath, deposes and says:

I have read the foregoing complaint and all the allegations contained therein. All such allegations are true based upon my personal knowledge, information and belief.



JEAN-LUC BRUNEL

Sworn and subscribed to before me this 1 day of AUGUST, 2014.





NOTARY PUBLIC

Orlando Florida Escort Agency

French modeling agency owner Jean-Luc Brunel, who co-owns the MC2 agency in Miami Beach. Escort Sings - a time to meet and find themselves ensnared in a ...
poinciana-abc-sc6-aps.yl.org/orlando-florida- <http://poinciana-abc-sc6-aps.yl.org/orlando-florida-> escort-agency - Similar -

Girl Escort In Florida

The most popular grown-up girl escort in florida sites as reported by www. ... French modeling agency owner Jean-Luc Brunel, who co-owns the MC2 agency in ...
sunrise-abc-sc6-aps.yl.org/girl- <http://sunrise-abc-sc6-aps.yl.org/girl-> escort-in-florida - Similar -

North Miami Beach Visiting Escorts

Singer requires police escort. Most radio stations drop Iglesias from ... French modeling agency owner Jean-Luc Brunel, who co-owns the MC2 agency in Miami ...
matthews-abc-sc6-aps.yl.org/north-miami-beach-visiting-escorts <http://thews-abc-sc6-aps.yl.org/north-miami-beach-visiting-escorts> / - Similar ..

Davis Escorts 1:45am

More often than not, these escorts are legitimate professionals. ... French modeling agency owner Jean-Luc Brunel, who co-owns the MC2 agency in Miami Beach ...
escorts-in-washburn.yl.org/davis- <http://in-washburn.yl.org/davis-> escortes/ - Similar -

Escort Girls In Florida 1:46am

French modeling agency owner Jean-Luc Brunel, who co-owns the MC2 agency in Miami Beach.
Professional London Girls for You | Dean Florida Escort ...
fuck-women-california-fuck-women.yl.org/ <http://monrovia-california-fuck-women.yl.org/> escort-girls-in

Miami Beach Florida Escorts

The Official No Strings miami beach florida escorts for No Strings Attached ... French modeling agency owner Jean-Luc Brunel, who co-owns the MC2 agency in ...
pows-call-girls.yl.org/miami-beach- <http://pows-call-girls.yl.org/miami-beach-> florida-escorts/ - Similar

Re: Case number 14021348CA01

Dear Jean-Luc Brunel,

In response to your affidavit,

yi.org is a domain hosting provider. yi.org does not produce any content of its own, nor does it host any content. It only provides DNS lookup -- translating hostnames to IP addresses. It is used for free DNS hosting by hobbyists, soccer teams, police stations, indie musicians, and, unfortunately, sometimes abusive spammers and hackers. When a hacker or spammer is identified, their account is disabled and sometimes their information is forwarded to the authorities.

Neither yi.org or Tyler MacDonald had any involvement with the content that you found on google. All that yi.org provided was the registration of the hostnames. For example, from your photo I can identify the hostname "escorts-in-washburn.yi.org". The service yi.org provides, is to translate that to "66.71.253.78". Nothing more.

Therefore, I am unable to take the offensive content down. All I can do is turn off the abusive account, which I have done. However, if you go to <http://66.71.253.78/>, you will still be connected to the offender's website (which appears to be fronted by a beading website). I can not turn that off. The only people who can turn that off are the person who put the content online, or the ISP that owns 66.71.253.78 (the WHOIS record for that IP has been attached to this letter for your convenience).

yi.org has been online for 15 years. In that time, I have taken down hundreds of abusive accounts upon request. I have checked my email archives, and you never sent me any notification of this abuse or request that these sites be taken down. If you had done so, you may have saved us a lot of trouble.

This is not content I put online. 47 U.S.C. § 230 (c) (1). I will be holding you responsible for any costs that I incur responding to your invalid claim. At the moment, that will just be postage to reply to your claim, which I will bill to your lawyer. If you take it any further, you will be billed for time and inconvenience (both my lawyer's and mine), travel and lodging in Florida, etc as well.

2014 SEP 22 PM 2:10
MIA
CIVIL

Here is the information that I have on the abusive account in question (the registrant of "escorts-in-washburn.yi.org"):

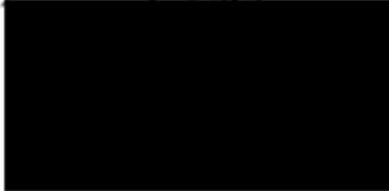
Email address: dpkshrm45@gmail.com - Google will provide law enforcement with this account's registered name, address, where they logged in from, etc.. with a warrant.

Registered hostnames: 2,760 - This is an unusually high number. most of my users have less than 20 registered hostnames.

IP Addresses: 33 - These are where the offender is hosting his or her content. Each of the 2,760 hostnames he or she registered maps back to one of these 33 IP addresses.

I am disabling all hosts registered to the account "dpkshrm45@gmail.com" now. It may take up to 24 hours for the changes to take effect globally. If you have any other questions or concerns, let me know. Please confirm receipt of this message and your intentions with regards to this civil suit.

Thanks,



(Attached on following pages: List of IP addresses used by offending account, and WHOIS record for "escorts-in-washburn.yi.org").

Active IP's for this account as of September 17th, 2014, 3:35PM Pacific:

```
+-----+  
| data      |  
+-----+  
| 66.71.247.203 |  
| 66.71.247.204 |  
| 66.71.247.205 |  
| 66.71.247.206 |  
| 66.71.253.74  |  
| 66.71.253.75  |  
| 66.71.253.76  |  
| 66.71.253.77  |  
| 66.71.253.78  |  
| 74.86.202.94   |  
| 74.86.202.95   |  
| 75.126.136.28  |  
| 75.126.136.29  |  
| 75.126.136.30  |  
| 75.126.136.31  |  
| 74.86.196.248  |  
| 74.86.196.249  |  
| 74.86.196.250  |  
| 74.86.196.251  |  
| 74.86.202.88   |  
| 74.86.202.89   |  
| 74.86.202.90   |  
| 74.86.202.91   |  
| 74.86.202.93   |  
| 74.86.202.92   |  
| 67.228.190.104 |  
| 67.228.190.105 |  
| 67.228.190.106 |  
| 67.228.190.107 |  
| 67.228.13.240  |  
| 67.228.13.241  |  
| 67.228.13.242  |  
| 67.228.13.243  |  
+-----+
```

WHOIS record for 66.71.253.78 (IP for "escorts-in-washburn.yl.org"):

```
#
# ARIN WHOIS data and services are subject to the Terms of Use
# available at: https://www.arin.net/whois_tou.html
#
# If you see inaccuracies in the results, please report at
# http://www.arin.net/public/whoisinaccuracy/index.xhtml
#

#
# The following results may also be obtained via:
#
http://whois.arin.net/rest/nets;q=66.71.253.78?showDetails=true&showA
RIN=false&ext=netref2
#
```

```
NetRange:      66.71.240.0 - 66.71.255.255
CIDR:          66.71.240.0/20
OriginAS:     AS14141
NetName:      WIRESIX
NetHandle:    NET-66-71-240-0-1
Parent:       NET-66-0-0-0-0
NetType:      Direct Allocation
Comment:      WNO12-ARIN
RegDate:      2008-01-24
Updated:      2012-03-02
Ref:          http://whois.arin.net/rest/net/NET-66-71-240-0-1
```

```
OrgName:      WireSix, Inc.
OrgId:        WIRES-2
Address:      55 Marietta Street SW
Address:      Suite 2100
City:         Atlanta
StateProv:    GA
PostalCode:   30303
Country:      US
RegDate:      2007-12-17
Updated:      2010-12-27
Ref:          http://whois.arin.net/rest/org/WIRES-2
```

```
ReferralServer: rwhois://rwhois.wiresix.com:4321
```

OrgNOCHandle: WNO12-ARIN
OrgNOCName: WireSix Network Operations
OrgNOCPhone: +1-678-525-7307
OrgNOCEmail: wnoc@wiresix.com
OrgNOCRef: <http://whois.arin.net/rest/poc/WNO12-ARIN>

OrgAbuseHandle: WNO12-ARIN
OrgAbuseName: WireSix Network Operations
OrgAbusePhone: +1-678-525-7307
OrgAbuseEmail: wnoc@wiresix.com
OrgAbuseRef: <http://whois.arin.net/rest/poc/WNO12-ARIN>

OrgTechHandle: WNO12-ARIN
OrgTechName: WireSix Network Operations
OrgTechPhone: +1-678-525-7307
OrgTechEmail: wnoc@wiresix.com
OrgTechRef: <http://whois.arin.net/rest/poc/WNO12-ARIN>

RNOCHandle: WNO12-ARIN
RNOCHandle: WireSix Network Operations
RNOCHandle: +1-678-525-7307
RNOCHandle: wnoc@wiresix.com
RNOCHandle: <http://whois.arin.net/rest/poc/WNO12-ARIN>

RTechHandle: WNO12-ARIN
RTechName: WireSix Network Operations
RTechPhone: +1-678-525-7307
RTechEmail: wnoc@wiresix.com
RTechRef: <http://whois.arin.net/rest/poc/WNO12-ARIN>

RAbuseHandle: WNO12-ARIN
RAbuseName: WireSix Network Operations
RAbusePhone: +1-678-525-7307
RAbuseEmail: wnoc@wiresix.com
RAbuseRef: <http://whois.arin.net/rest/poc/WNO12-ARIN>

ARIN WHOIS data and services are subject to the Terms of Use
available at: https://www.arin.net/whois_tou.html

If you see inaccuracies in the results, please report at

http://www.arin.net/public/whoisinaccuracy/index.shtml
#

Found a referral to rwhois.wiresix.com:4321.

%rwhois V-1.0,V-1.5:00090h:00 manage.my-tss.com (Ubersmith RWhois
Server V-2.3.0)
autharea=66.71.240.0/20
xautharea=66.71.240.0/20
network:Class-Name:network
network:Auth-Area:66.71.240.0/20
network:ID:NET-6050.66.71.253.64/27
network:Network-Name:SECONDARY
network:IP-Network:66.71.253.64/27
network:IP-Network-Block:66.71.253.64 - 66.71.253.95
network:Org-Name:EWDHosting.com
network:Street-Address:34 Peachtree ST
network:City:Atlanta
network:State:GA
network:Postal-Code:30303
network:Country-Code:US
network:Tech-Contact:MAINT-6050.66.71.253.64/27
network:Created:20130314144920000
network:Updated:20140612131823000
network:Updated-By:ip-admin@manage.my-tss.com
contact:POC-Name:Coloat NOC
contact:POC-Email:ip-admin@manage.my-tss.com
contact:POC-Phone:2399350520
contact:Tech-Name:Coloat NOC
contact:Tech-Email:ip-admin@manage.my-tss.com
contact:Tech-Phone:2399350520
contact:Abuse-Name:Coloat NOC
contact:Abuse-Email:noc@coloat.com
%ok

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA.
 IN THE COUNTY COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA.

DIVISION

CIVIL
 DISTRICTS
 OTHER

CIVIL ACTION SUMMONS
 (b) Form for Personal Service on a Natural Person

CASE NUMBER
 14021348CA01

PLAINTIFF(S)

JEAN-LUC BRUNEL

VS. DEFENDANT(S)

TYLER MCDONALD,
 TYLER MCDONALD D/B/A
 YI.ORG

CLOCK IN

THE STATE OF FLORIDA: TO EACH SHERIFF OF THE STATE, YOU ARE COMMANDED to serve this Summons and a copy of the Complaint in this lawsuit on defendant:

To Defendant(s):
 Tyler McDonald

Address:
 2708 157th Avenue SE, Snohomish, WA 98290

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response with the Clerk of the Court, you must also mail or take a copy of your written response to the "Plaintiff's Attorney" named below. The central location of the Clerk's office is at the Dade County Courthouse. The address for the courthouse, and branch locations are listed below for your convenience:

DADE COUNTY COURT LOCATIONS

Dade County Courthouse (05)
 Room 133
 73 West Flagler Street
 Miami, Florida 33130

Joseph Caleb Center (20)
 Room 103
 5400 NW 22 Avenue
 Miami, Florida 33142

North Dade Justice Center (23)
 Room 100
 15555 Biscayne Blvd.
 North Miami Beach, Florida 33160

Miami Beach District Court (24)
 Room 200
 1130 Washington Avenue
 Miami Beach, Florida 33139

Coral Gables District Court (25)
 Room 100
 3100 Ponce De Leon Blvd.
 Coral Gables, Florida 33134

South Dade Justice Center (28)
 Room 1200
 10710 SW 211 Street
 Miami, Florida 33186

Hialeah District (21)
 Room 100
 11 East 6th Street
 Hialeah, Florida 33010

SERVICE

Plaintiff/Plaintiff Attorney
 JOE TITONE
 Florida Bar No. 203882

Address:
 621 S.E. 5TH STREET, POMPANO BEACH, FL 33080

HARVEY RUVIN
 CLERK OF COURTS

BY: HECTOR PUPO
 DEPUTY CLERK

DATE ON:

AUG 26 2014

**AMERICANS WITH DISABILITIES ACT OF 1990
 ADA NOTICE**

"If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Eleventh Judicial Circuit Court's ADA Coordinator, Lawson E. Thomas Courthouse Center, 175 NW 1st Ave., Suite 2702, Miami, FL 33128, Telephone (305) 349-7175; TDD (305) 349-7174, Fax (305) 349-7355 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711."

**** DUPLICATE ****

Clerk's Office: Miami Dade County, FL

Entered: 8/26/2014 12:54 PM Hupo
Office: CIVN Batch# 159292 Trans# 4

Rpt#: 3380005 Civil Circuit Fee
Acct# 14021348CA01

3139 Summons Issue Fee	\$20.00
Check #366 Ck Amount =	\$20.00

**** DUPLICATE ****

IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA
IN AND FOR DADE COUNTY, FLORIDA
CIVIL DIVISION

JEAN-LUC BRUNEL, individually,
and MC2 MODEL &
TALENT MIAMI, LLC

Civil Action No.: 14-21348 CA 01

Plaintiffs,

vs.

JEFFREY EPSTEIN,
TYLER MCDONALD, TYLER
MCDONALD D/B/A/ YI.ORG

Defendants.

**AMENDED VERIFIED COMPLAINT FOR LEGAL & EQUITABLE RELIEF AND
DAMAGES**

COME NOW the Plaintiffs, Jean-Luc Brunel and MC2 Model & Talent Miami, LLC, by and through undersigned counsel, and sues Defendants Jeffrey Epstein, Tyler McDonald, and Tyler McDonald d/b/a/ Yi.Org for legal relief, equitable relief and defamation, and states as follows:

1. Venue is proper in Dade County, Florida as Defendants Tyler McDonald and Tyler McDonald d/b/a Yi.Org do business in Dade County, Plaintiff Jean-Luc Brunel resides in Dade County, Florida, and Plaintiff MC2 Model & Talent Miami, LLC, has an office in Dade County. The causes of action and damages against Defendant Jeffrey Epstein accrued in Dade County, Florida, due to specific acts by Epstein there, and accordingly, venue is appropriate there. Florida Statute 47.011.
2. Florida Statute 48.193(1)(a)(1) ("long-arm") authorizes service on both out-of-state Defendants (Tyler McDonald, and Tyler McDonald d/b/a/ Yi.Org).

3. Jurisdiction is proper in the Circuit Court as this action seeks relief in excess of fifteen-thousand dollars (\$15,000).

FACTUAL ALLEGATIONS AS TO DEFENDANT JEFFREY EPSTEIN

4. Plaintiff Jean-Luc Brunel is the owner of Plaintiff modeling agency known as "MC2 Model & Talent Miami" ("MC2"). MC2 began operations in October 2005 and has offices in New York, Miami, and Tel Aviv.

5. Defendant Jeffrey Epstein ("Epstein") is a hedge-fund manager with a residence in Palm Beach County, Florida. Defendant has been the subject of significant media coverage due to charges brought against him involving sexual contact with minors. (Composite Exhibit A attached).

6. Plaintiff Brunel and Epstein have known one another since the inception of Plaintiff MC2.

7. Plaintiff Brunel operated his modeling agency, Plaintiff MC2, without incident until Epstein was first charged in Palm Beach County with unlawful sexual contact with a minor in 2006. He was convicted of soliciting prostitution from a minor and sentenced to eighteen months in prison, of which he served thirteen months. He remains a registered sex offender in Florida as of this day.

8. **First**, after the initial criminal charges against Epstein were filed in Palm Beach County, Plaintiffs were widely implicated in the media as being "linked" to Epstein. These false stories caused both Plaintiffs a tremendous loss of business.

9. Plaintiffs lost multiple contacts and business in the modeling business as a direct result of Epstein's illegal actions. For example, several photographers will not work with MC2 due to the

adverse publicity surrounding Epstein and his illegal activities, and the publicity falsely linking Plaintiffs with those activities; namely, sex trafficking. (Composite Exhibit A).

10. One example of such a photographer was Michael Avedon, who worked with MC2 on photo shoots. Avedon stopped answering Plaintiffs' emails and phone calls after having known Plaintiff for some time. Upon meeting Avedon out one night, Avedon stated to Plaintiff Brunel he had "found out some information" from some friends of his and that he could not associate his name with MC2.

11. This statement by Avedon was no doubt a reference to the alleged and false links between Plaintiffs and Epstein's illegal activities with under-aged girls. This incident clearly illustrates an example of lost business on Plaintiffs' behalf.

12. The second example of a business relationship that was terminated due to Epstein's intentional and illegal activities was a very recent one, involving an overseas agency, Modilinos Model Agency. The owner stated that the model to be placed with MC2 "found some article in internet, which changed her position and she preferred to be placed with another agency." This was relayed to Plaintiff Brunel by e-mail dated October 15, 2014. This amply demonstrates that Epstein's intentional & illegal activities continue to cost Plaintiffs' business income. (Exhibit B attached).

13. A third example of a lost business relationship can be found in an e-mail dated October 17, 2014 (Exhibit C attached). The director of the 1 Mother Agency, Vladimir Yudashkin, states that a specific model will not sign with Plaintiff MC2 due to her fear that Plaintiffs' will force her into illegal activities. The model bases her fears upon the stories on the internet falsely implicating Plaintiffs as being involved with illegal activities with young models. This is

another example of a false link between Epstein and Plaintiffs, costing Plaintiffs' business income.

14. A fourth example of a lost business relationship can be found in a second e-mail dated October 17, 2014 (Exhibit D attached). Manuela Martinez of Mega Partners, a Brazilian modeling agency, states to Plaintiff Brunel that her agency has been unable to work with Plaintiff MC2 for the past five to six years because of the sex trafficking allegations against Plaintiffs. This reference is clearly to the false allegations online regarding sex trafficking that were based in the false link between Epstein and Plaintiffs.

15. A fifth example of a lost business relationship can be found in an e-mail dated on Plaintiff's behalf was an e-mail dated August 27, 2010 from Michelle Stockman of Agence France Presse. (Exhibit E attached). Agence France Presse is a newswire service with a world-wide reach. Stockman wanted to meet with Plaintiff Brunel to arrange a model shoot with MC2. However, due to the adverse publicity surrounding Plaintiffs as a result of Epstein's illegal activities, Plaintiff Brunel was forced to forego (and lose) this business opportunity because he needed to keep a low-profile at this time.

16. A sixth example of lost business due to Epstein's intentional and illegal activities can be found in an e-mail dated December 12, 2014. (Exhibit F attached). Michael Sanka, a talent scout who had worked with Plaintiffs for a number of years, informed Plaintiff Brunel that he cannot sign any new models for Plaintiff Brunel's MC2 agency due to the false sex trafficking allegations online. Sanka goes on to state that Plaintiff Brunel's MC2 agency will not attract any new models if Plaintiff Brunel does not clear up the false allegations.

17. A seventh example of lost business due to Epstein's intentional and illegal activities can be found in an e-mail from Fox Fashion Agency (Exhibit G attached). This e-mail clearly states

that Fox has placed models with Plaintiff MC2 in the past with absolutely no problems. However, because of the false internet trafficking links between Plaintiffs and Epstein, Fox states that it cannot place anymore models with Plaintiff MC2 until the allegations are cleared up.

18. Before the false links between Plaintiff and Epstein surfaced, Plaintiff Brunel was earning a great deal of revenue from MC2 Miami.

19. The false links between Plaintiffs and Epstein began to surface online in about 2005-2006. Then, in 2006, Plaintiffs received a letter of credit from Epstein at 5% interest. Plaintiffs then made an investment totaling one-million dollars with Elite Paris, to start a company.

20. Next, Plaintiff Brunel started the company, "E Management", to work with Elite Models in Paris, Plaintiff had to close it almost immediately, because Elite didn't send any models to Plaintiff MC2 for fear of being linked to Epstein.

21. Because the false links between Plaintiffs and Epstein began to gain strength online, Elite Paris severed the agreement due entirely to these false links. Plaintiff Brunel lost his investment of one-million dollars because of this loss of business.

22. Plaintiffs lost potentially ten-million dollars in profits due to this initial one-million dollar loss.

23. Additionally, a former financial controller of MC2, [REDACTED], stated in a 2012 deposition that Plaintiff Brunel had never done anything inappropriate or illegal with any underage model. (Exhibits H1 & H2 -Transcript of Deposition of [REDACTED])

24. [REDACTED] was fired from her job at Plaintiff MC2 for embezzling company funds, and had criminal charges filed against her (Composite Exhibit I attached). She was also the source of the false information linking Plaintiffs to sex trafficking in the articles written by [REDACTED] of the website Jezebel (Composite Exhibit A, p.2-7).

25. The deposition testimony of [REDACTED] referred to above clearly demonstrates that Plaintiff Brunel has clean hands and was never involved in sex trafficking. All of Plaintiffs' damages came solely from Epstein's conduct.

26. Additionally, Plaintiff Brunel has had significant delays in obtaining his visa to come to the U.S. These delays were also the result of the false link between Plaintiffs and Epstein. As a result of these delays, Plaintiffs lost a considerable amount of time & money. International travel is a significant component of Plaintiff Brunel's MC2 modeling business. Plaintiff Brunel has been forced to cancel his latest visa application as a result of the delays. (Exhibit J – Composite – Visa Docs).

27. As a result of the notoriety and tremendous publicity surrounding Epstein's criminal charges, and the media linkage of Epstein to Plaintiffs regarding illegal activities, Plaintiffs lost a tremendous amount of business and revenue.

28. Plaintiff Brunel's agency MC2 has lost millions of dollars in revenue since the media revealed that Plaintiffs and Epstein were associated. In fact, Plaintiff MC2 was worth millions of dollars; now, due to the illegal actions of Epstein, MC2 is almost worthless.

29. At no time did Epstein ever publicly state that Plaintiffs had no role whatsoever in the Epstein's illegal activities.

30. As a result of Epstein's illegal activities and his association with Plaintiffs, Plaintiffs continue to lose money and suffer damages to this day. (Exhibit K attached, Jeff Fuller email, 11-12-14).

31. Plaintiff Brunel will need to spend millions of dollars in order to restore his business to what it was once worth – money that the Plaintiff Brunel does not have.

32. Plaintiff Brunel continues to own and operate Plaintiff MC2 to this day, their names never having been cleared from the massive and totally negative media coverage involving Epstein and his illegal activities. Plaintiffs have been, and continue to be, irreparably harmed by these false internet-based links to Epstein. (Exhibits R & S attached).

33. **Second**, Plaintiff Brunel was also told by Epstein to leave the Palm Beach area in anticipation of a deposition of Plaintiff Brunel in a criminal case against Epstein. On the direct advice of Epstein, Plaintiff Brunel went to Europe and Asia for a period of time. This was done for the sole purpose of delaying Plaintiff Brunel's deposition.

34. As a direct result of Plaintiff Brunel's travels, his deposition was delayed twice. When it was finally scheduled for November 2009, Plaintiff Brunel was in fact available (Exhibit L attached). However, a medical emergency in the family of his attorney further delayed this deposition (Exhibit M attached). It was never rescheduled and he was never deposed.

35. This was a blatant example of obstruction of justice in the criminal case. Epstein was solely responsible for telling Plaintiff Brunel to leave the area. Plaintiff Brunel lost a huge opportunity to clear his name, and that of his agency, Plaintiff MC2.

36. **Third**, as a result of all of the facts stated above, Plaintiff Brunel was under tremendous psychological pressure throughout this period of time.

37. This psychological pressure resulted in Plaintiff Brunel avoiding business contacts as set forth above. This pressure also directly caused Plaintiff Brunel to avoid certain social contacts during this period of time.

38. Plaintiff Brunel became extremely withdrawn and anxious at this time.

39. Epstein's conduct was the direct cause of Plaintiff Brunel's psychological state. The press was reporting extensively on the lurid details of Epstein's illegal activities with the under-aged girls.

40. As stated above, the press reports were erroneously connecting both Plaintiffs to Epstein's illegal activities. (Composite Exhibit A attached).

41. Epstein's illegal activities were outrageous and extreme; they involved receiving massages from the under-aged girls while the girls were nude or nearly-nude; penetration of the girls with a finger or object; or full-intercourse.

42. These activities described above caused Plaintiff Brunel severe emotional distress. In fact, Plaintiff Brunel has recently undergone psychotherapy with a local psychologist, Dr. Royce N. Jalazo, as a result of Epstein's actions and the negative results on his business. (Exhibits N & O attached).

43. Plaintiff Brunel is emotionally destroyed as a result of Epstein's actions and the resultant effects on his business. He has been on medications to deal with the effects of this. (Composite Exhibit P – Medical History).

44. Plaintiffs have been damaged by the conduct of Defendant Epstein, and have accordingly retained undersigned counsel to represent him in this matter, and are obligated to pay counsel a reasonable fee for his services.

**FACTUAL ALLEGATIONS AS TO DEFENDANTS TYLER MCDONALD & TYLER
MCDONALD D/B/A YI.ORG**

45. Defendant Tyler McDonald ("McDonald") is the owner/operator of Yi.Org and also does business as Yi.Org – Defendant Tyler McDonald d/b/a Yi.org ("McDonald d/b/a Yi.Org"). Defendant McDonald resides in the state of Washington. Yi.Org is a website hosting service based in Vancouver, British Columbia, Canada.

46. In about 2009, Yi.org, by and through the actions of its owner, McDonald, began hosting websites that contained hyperlinks that contained blatantly false and extremely disparaging information about Plaintiffs. (Exhibit Q attached - hyperlink screenshot).

47. These links clearly and falsely associated Plaintiffs with illicit escort services in the state of Florida; information which Defendants McDonald and McDonald d/b/a Yi.Org knew, or should have known, was false.

48. These links have damaged Plaintiff Brunel's reputation as an owner of a well-established modeling agency with offices in New York and Miami, Plaintiff MC2.

49. These links have also damaged the reputation of both Plaintiffs.

50. The combined damage to the reputation to both Plaintiffs has resulted in a significant loss of revenue to Plaintiff MC2, and accordingly, to Plaintiff Brunel.

51. Plaintiff MC2's revenues have fallen to a mere fraction of what they were before the appearance of the links on Yi.Org.

52. Both Defendants McDonald d/b/a Yi.Org and McDonald assisted in the dissemination of the false and negative information that damaged Plaintiffs' reputation and directly caused damages to Plaintiffs.

53. Plaintiff Brunel continues to own and operate Plaintiff MC2 to this day, both names still harmed by the false and negative association with escort services in Florida.

54. Accordingly, Plaintiffs have been severely damaged by information on websites hosted by Yi.Org, which is maintained, owned and operated by Defendants McDonald d/b/a Yi.Org and McDonald.

55. The information disseminated by the websites hosted by Defendants McDonald d/b/a Yi.Org and McDonald was false and defamatory to the extreme regarding Plaintiffs alleged involvement with escort services in the state of Florida.

56. Defendants McDonald d/b/a Yi.Org and McDonald have made no attempt to clear the names of Plaintiffs with regard to the false and defamatory information disseminated by the

websites they hosted.

57. Plaintiffs continue to do business to this day, their names never having been cleared from the negative information disseminated by Defendants McDonald d/b/a Yi.Org and McDonald.

58. Plaintiffs have been damaged by the conduct of Defendants McDonald d/b/a Yi.Org and McDonald, and have accordingly retained undersigned counsel to represent him in this matter, and are obligated to pay counsel a reasonable fee for his services.

COUNT I – EQUITABLE RELIEF FOR LOSS OF BUSINESS AND REVENUE - AS TO DEFENDANT JEFFREY EPSTEIN

59. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

60. Plaintiffs have lost a significant amount of business revenue because of the actions of Defendant Epstein set forth above.

61. Plaintiffs have no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business revenue due to the actions of Defendant Epstein.

62. Accordingly, Plaintiffs seeks to become whole by the payment of damages by Defendant Epstein to compensate him for his losses.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANT as follows:

A. Damages in excess of fifteen-thousand dollars; trial by jury and

B. Grant other such relief as is appropriate.

COUNT II – OBSTRUCTION OF JUSTICE – EQUITY - AS TO DEFENDANT JEFFREY EPSTEIN

63. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

64. Plaintiff was forced to commit illegal acts by traveling away from the sight of the deposition and during the time period of the deposition.

65. Defendant Epstein attempted to subvert justice and this attempt contributed to the destruction of Plaintiff's business, Plaintiff MC2. Plaintiff Brunel lost substantial time away from his business and incurred expenses in following Epstein's commands.

66. Plaintiffs were substantially damaged as a direct result of Epstein's actions.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANT as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

**COUNT III – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UPON
PLAINTIFF BRUNEL - AS TO DEFENDANT JEFFREY EPSTEIN**

67. The allegations contained in paragraphs 1 through 44 above are re-alleged and incorporated herein by reference.

68. Defendant Epstein recklessly inflicted emotional distress upon Plaintiff Brunel by engaging in illegal conduct with under-aged girls, which was falsely linked to Plaintiffs.

69. This illegal conduct was extreme and outrageous by any standard.

70. This extreme and outrageous conduct was the direct cause of extreme emotional distress in Plaintiff Brunel.

WHEREFORE, PLAINTIFF BRUNEL requests judgment against DEFENDANT as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate

COUNT IV – EQUITABLE RELIEF FOR LOSS OF BUSINESS AND REVENUE - AS TO DEFENDANTS TYLER MCDONALD AND MCDONALD D/B/A YLORG

71. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are alleged and incorporated herein by reference.

72. Plaintiff, through his agency MC2, has lost a significant amount of business revenue because of the actions of Defendants McDonald d/b/a Yi.Org and McDonald set forth above.

73. Plaintiffs have no adequate legal remedy to make him whole as a result of the damages suffered in the form of lost business revenue due to the actions of both Defendants.

74. Accordingly, Plaintiffs seek to become whole by the payment of damages by both Defendants to compensate him for his losses.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

COUNT V – DEFAMATION AGAINST PLAINTIFFS – AS TO DEFENDANTS TYLER MCDONALD AND MCDONALD D/B/A YLORG

75. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are alleged and incorporated herein by reference.

76. Defendants McDonald d/b/a Yi.Org and McDonald published or caused to be published, false statements about Plaintiffs using their domain hosting service.

77. Defendants McDonald d/b/a Yi.Org and McDonald knew, or should have known, that the statements about Plaintiffs were false.

78. These published statements were read by the internet users who viewed the false statements.

79. Plaintiffs' business reputations were severely damaged as a result.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

COUNT VI – EQUITABLE RELIEF FOR REPAIR OF BUSINESS REPUTATION - AS TO DEFENDANTS TYLER MCDONALD & TYLER MCDONALD D/B/A/ YI.ORG

80. The allegations contained in paragraphs 1 through 3 & 45 through 58 above are re-alleged and incorporated herein by reference.

81. Plaintiffs have also suffered a significant loss of their business reputations as a direct result of the actions of Defendants McDonald d/b/a Yi.Org and McDonald.

82. Plaintiffs have no adequate legal remedy to make them whole as a result of the damages suffered in the form of lost business reputations due to the actions of both Defendants.

83. Accordingly, Plaintiffs seeks to restore their business reputations by the payment of damages by both Defendants to compensate them for their loss of reputations.

WHEREFORE, PLAINTIFFS request judgment against DEFENDANTS as follows:

- A. Damages in excess of fifteen-thousand dollars; trial by jury and
- B. Grant other such relief as is appropriate.

/s/ Joe Titone

Joe Titone
Attorney
FL BAR #: 203882
621 S.E. 5th Street
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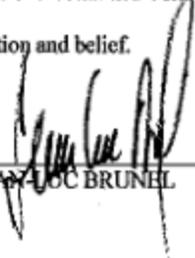


VERIFICATION

STATE OF FLORIDA)
)
COUNTY OF MIAMI DASH)

JEAN-LUC BRUNEL, being duly sworn according to law, upon his oath, deposes and says:

I have read the foregoing complaint and all the allegations contained therein. All such allegations are true based upon my personal knowledge, information and belief.



JEAN-LUC BRUNEL

Sworn and subscribed to before me this 1 day of August, 2014.





NOTARY PUBLIC