



- 1 1. Plaintiff Yuri Vanetik is an American attorney, political activist and businessman who has  
2 served as California Lottery Commissioner and Criminal Justice Commissioner, appointed  
3 by Governor Arnold Schwarzenegger. Vanetik resides in Newport Beach, in the County of  
4 Orange, state of California.
- 5 2. The Defendant, Brian Troy Hall aka Brian Hall aka Brian T. Hall (“Brian Hall” or  
6 “Defendant Brian Hall”) and Michelle A. Hall are residents of Gig Harbor, Washington,  
7 residing at 6515 43<sup>rd</sup> Avenue Court, Gig Harbor, WA 98335.
- 8 3. Defendant Brian T. Hall together with his wife, Michele A. Hall aka Michele Hall operates  
9 an importation and sales of ROW-vintage and legacy Land Rover Defender parts, vehicles,  
10 and restoration services business under the name Defenders Northwest, LLC  
11 ([www.defendersnorthwest.com](http://www.defendersnorthwest.com)).  
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- 13 4. Brian Hall is also a purported owner of a related business called Autohome USA  
14 ([www.autohomeusa.com](http://www.autohomeusa.com)).  
15
- 16 5. Defendants Brian Hall and Michele Hall are also defendants in an unrelated lawsuit brought  
17 in Orange County, Superior Court, where they are accused, inter alia, of defrauding  
18 customers through fake automotive restoration projects and operating an illegal automotive  
19 parts marketing, sales and distribution business.
- 20 6. The true names and capacities, whether individual, corporate, limited liability company,  
21 associate, or otherwise, of the named Defendants sued herein as DOES 1 through 50,  
22 inclusive, hereinafter also referred to as the “Fictitiously Named Defendants” or (“DOES”),  
23 are currently unknown to Plaintiff who, therefore, sues said Defendants by such fictitious  
24 names. Plaintiff is informed and believes, and based upon such information and belief  
25 alleges, that each of the Fictitiously Named Defendants are responsible to Plaintiff in some  
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1 manner for the acts, omissions, or other conduct as hereinafter alleged, or is a necessary party  
2 for the relief sought herein and is subject to the jurisdiction of this court; and further are  
3 being sued in both their individual and official capacity. Plaintiff will seek leave of court to  
4 amend this Complaint to allege each of their true names and capacities when same have been  
5 ascertained.

- 6
- 7 7. Each reference to “Defendant,” “Defendants,” “DEFENDANT” and/or “DEFENDANTS”  
8 herein is intended to be a reference to all Defendants named herein, including the Fictitiously  
9 Named Defendants, unless otherwise expressly indicated or the context otherwise requires.
- 10 8. Plaintiff Vanetik is informed and believes, and based upon such information and belief  
11 alleges, that at all times herein relevant, each of the Defendants was and is the principal,  
12 agent, representative, supervisor, employee, servant, alter ego, partner, shareholder, director,  
13 officer, joint venture, parent corporation, subsidiary corporation, co-conspirator, licensor,  
14 licensee, inviter, invitee, predecessor-in-interest, successor-in-interest, assignor and/or  
15 assignee (hereinafter referred to as an “Interrelationship”), as may be applicable, of each the  
16 other Defendants, and, in doing the things hereinafter alleged, was (a) acting in concert with  
17 all of the other Defendants; (b) under the direction, instruction, demand, requirement, and/or  
18 control of some or all of the other Defendants; (c) in furtherance of a common plan, scheme,  
19 enterprise and/or control of some or all of the other Defendants; (d) in furtherance of a  
20 common plan, scheme, enterprise and/or conspiracy with some or all of the Defendants;  
21 and/or (e) with the knowledge, consent, acquiescence, and/or prior or subsequent ratification  
22 of some or all of the other Defendants. Plaintiff Vanetik is further informed and believes and  
23 based thereon alleges that the acts and conduct herein alleged of each such Defendant were  
24 known to, authorized by, and/or ratified by the other Defendants, and each of them.  
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2 9. Plaintiff Vanetik further alleges that each of said Defendants proximately caused the injuries  
3 and damages by reason of negligent, careless, deliberately indifferent, intentional, willful or  
4 wanton misconduct, including the negligent, careless, deliberately indifferent, intentional,  
5 willful or wanton misconduct in creating and otherwise causing the incidents, conditions and  
6 circumstances hereinafter set forth, or by reason of the direct or imputed intentional acts,  
7 negligence or vicarious fault or breach of duty arising out of the matters herein alleged.  
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9 10. Plaintiff Vanetik is informed and believes and, on that basis, alleges that in connection with  
10 the acts set forth herein, each of the Defendants acted willingly, intentionally, and  
11 knowingly, both for himself, herself, or itself, and in concert with each other Defendant, and  
12 as an agent for each other Defendant, and was at all times acting within the course and scope  
13 of such agency, with the consent, authorization and/or ratification of each other Defendant,  
14 and in furtherance of a common scheme to defame Vanetik and interfere with and destroy  
15 his business interests globally, as further discussed below.  
16

17 11. Plaintiff is informed and believes, and based upon such information and belief alleges, that at  
18 all times herein relevant, each of the Defendants was and is the principal, agent,  
19 representative, supervisor, employee, servant, alter ego, partner, shareholder, director,  
20 officer, joint venture, parent corporation, subsidiary corporation, co-conspirator, licensor,  
21 licensee, inviter, invitee, predecessor-in-interest, successor-in-interest, assignor and/or  
22 assignee (hereinafter referred to as an "Interrelationship"), as may be applicable, of each the  
23 other Defendants, and, in doing the things hereinafter alleged, was (a) acting in concert with  
24 all of the other Defendants; (b) under the direction, instruction, demand, requirement, and/or  
25 control of some or all of the other Defendants; (c) in furtherance of a common plan, scheme,  
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1 enterprise and/or control of some or all of the other Defendants; (d) in furtherance of a  
2 common plan, scheme, enterprise and/or conspiracy with some or all of the Defendants;  
3 and/or (e) with the knowledge, consent, acquiescence, and/or prior or subsequent ratification  
4 of some or all of the other Defendants.

5  
6 12. Plaintiff further alleges that each of said Defendants proximately caused the injuries and  
7 damages by reason of negligent, careless, deliberately indifferent, intentional, willful or  
8 wanton misconduct, including the negligent, careless, deliberately indifferent, intentional,  
9 willful or wanton misconduct in creating and otherwise causing the incidents, conditions and  
10 circumstances hereinafter set forth, or by reason of the direct or imputed negligence or  
11 vicarious fault or breach of duty arising out of the matters herein alleged.

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13 13. The lawsuit that has been filed against Defendant Brian Hall and his wife, Michele Hall has  
14 been featured in the multiple media domestically and overseas:

15 <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiPofqp3ZP7AhVLLUQIHUi0CigQFnoECAUQAQ&url=https%3A%2F%2Fpledgetimes.com%2Fwashington-state-auto-restorer-defenders-northwest-sued-for-fraud%2F&usg=AOvVaw2cVnptf2SVBHXNenDOPJU;>

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17  
18  
19 [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiA7Jma0Z37AhX\\_DkQIHZ7HDuoQFnoECBYQAw&url=https%3A%2F%2Ftheprint.in%2Ftheprint-valuead-initiative%2Fwashington-state-couple-brian-hall-and-michele-hall-accused-of-major-auto-repair-scam%2F1202118%2F%23%3A~%3Atext%3DA%2520lawsuit%2520for%2520fraud%2520filed%2Cscam%252C%2520defrauding%2520automotive%2520restoration%2520customers.&usg=AOvVaw2EUySfDQMuD0M3-y7KnZIR](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiA7Jma0Z37AhX_DkQIHZ7HDuoQFnoECBYQAw&url=https%3A%2F%2Ftheprint.in%2Ftheprint-valuead-initiative%2Fwashington-state-couple-brian-hall-and-michele-hall-accused-of-major-auto-repair-scam%2F1202118%2F%23%3A~%3Atext%3DA%2520lawsuit%2520for%2520fraud%2520filed%2Cscam%252C%2520defrauding%2520automotive%2520restoration%2520customers.&usg=AOvVaw2EUySfDQMuD0M3-y7KnZIR)

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2 14. Plaintiff, Vanetik is informed and believes that Defendant Brian Hall is a serial scammer  
3 who has been caught cheating Plaintiff, Vanetik’s clients and is blaming Plaintiff,  
4 Vanetik for having been exposed and sued.

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6 15. Plaintiff, Vanetik is informed and believes that Defendant Brian Hall and Michelle Hall  
7 decided to retaliate against Plaintiff Vanetik whom they blame for exposing Defendant  
8 Brian Hall and Michelle Halls’ scheme to defraud Defenders Northwest customers as set  
9 out in an unrelated action

10 [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwid2dff0Z37AhXCKEQIHSWfB7oQFnoECA0QAQ&url=https%3A%2F%2Fissuu.com%2Fdefendersnw%2Fdocs%2Fbrian_hall_defenders_northwest_noti_5f3c89402c3445&usg=AOvVaw0Y0pFp-AsluA6yUiEcZRcr)  
11 [8&ved=2ahUKEwid2dff0Z37AhXCKEQIHSWfB7oQFnoECA0QAQ&url=https%3A%](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwid2dff0Z37AhXCKEQIHSWfB7oQFnoECA0QAQ&url=https%3A%2F%2Fissuu.com%2Fdefendersnw%2Fdocs%2Fbrian_hall_defenders_northwest_noti_5f3c89402c3445&usg=AOvVaw0Y0pFp-AsluA6yUiEcZRcr)  
12 [2F%2Fissuu.com%2Fdefendersnw%2Fdocs%2Fbrian\\_hall\\_defenders\\_northwest\\_noti\\_5f](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwid2dff0Z37AhXCKEQIHSWfB7oQFnoECA0QAQ&url=https%3A%2F%2Fissuu.com%2Fdefendersnw%2Fdocs%2Fbrian_hall_defenders_northwest_noti_5f3c89402c3445&usg=AOvVaw0Y0pFp-AsluA6yUiEcZRcr)  
13 [3c89402c3445&usg=AOvVaw0Y0pFp-AsluA6yUiEcZRcr](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwid2dff0Z37AhXCKEQIHSWfB7oQFnoECA0QAQ&url=https%3A%2F%2Fissuu.com%2Fdefendersnw%2Fdocs%2Fbrian_hall_defenders_northwest_noti_5f3c89402c3445&usg=AOvVaw0Y0pFp-AsluA6yUiEcZRcr)  
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15 16. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendants Brian  
16 Hall, Michelle Hall and DOES have chosen to retaliate against Plaintiff Vanetik by  
17 attacking him online via social media such as Twitter and Facebook by creating fake  
18 name accounts such as “Purple Rain”, “Greg MacDonald”, “Bill Cosby”, “Michael  
19 Huntsman”, and multiple others.

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21 17. Plaintiff, Vanetik is informed and believes and on that basis alleges that Defendants  
22 began their acts described herein in approximately in October 2022 started posting  
23 vicious ad hominem attacks against Plaintiff Vanetik to cause emotional distress,  
24 financial harm, and reputational harm to Plaintiff Vanetik. All statements are knowingly  
25 untrue.

1 18. Plaintiff Vanetik is informed and believes and on that bases alleges that the documented  
2 and ongoing posts have been subject to forensic analysis and clearly show that they  
3 originate from the Defendants and reference an imposter web site created by the  
4 Defendants, using Plaintiff Vanetik’s full name (Yuri\_Vanetik.com) where Defendants  
5 posted false and malicious claims about Plaintiff Vanetik and his family, and business.  
6

7 19. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendant Brian  
8 Hall, using the imposter web site, and fake accounts on Twitter and Facebook started  
9 posting claims that Plaintiff Vanetik is a member of fringe terrorist organizations, is a  
10 criminal, and a client of notorious convicted pedophile and sex trafficker Jeffrey Epstein.  
11

12 20. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendants and  
13 each of them used fake web sites and accounts and are engaged and continue to  
14 systematically harass Plaintiff Vanetik, attacking his ethnicity, physical characteristics,  
15 and alleging that he is, inter alia, did not pass law school and college exams and is  
16 engaged in criminal activity; despite the outlandish and false nature of the Defendants’  
17 claims they have been including hashtags and posting on chat of Plaintiff Vanetik’s  
18 associates and clients causing him grave economic and reputational harm and emotional  
19 distress.  
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21 21. Plaintiff Vanetik is informed and believes and on that basis alleges that the Defendants  
22 and each of them posted false and malicious statements about Plaintiff Vanetik’s parents,  
23 asserting that they are criminals.

24 22. Plaintiff Vanetik is informed and believes that the Defendants have been actively  
25 working on an ongoing basis to defame Vanetik and interfere with his business interests  
26 not only in U.S., but globally.  
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2 **FACTS COMMON TO ALL CLAIMS FOR RELIEF**

3 23. Plaintiff, Vanetik is informed and believes and on that basis alleges that approximately  
4 between October 2022 to present time Defendant Brian Hall and DOES engage in a  
5 vicious campaign to libel him by using an imposter web site registered as a domain with  
6 his name – Yuri Vanetik and fake accounts on twitter and Facebook.  
7

8 24. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendants, used  
9 direct posts, guest posts on Plaintiff Vanetik’s Facebook page and twitter page, and by  
10 posting using hashtags and in conversations between third parties on the two aforementioned  
11 social media platforms posted, inter alia, insults and expletives in reference to Plaintiff  
12 Vanetik and his family, allegations that Plaintiff Vanetik is a criminal, terrorist, pedophile,  
13 lied about his education, professional licensing, social standing, etc.  
14

15 **DEFENDANTS’ ACTIONABLE BEHAVIOR**

16 25. Plaintiff Vanetik is informed and believes and, based thereon alleges that Defendant Brian  
17 Hall and Michelle Hall, and at all times relevant hereto was, an individual doing business in  
18 the County of Orange, State of California and used the Internet to defame Vanetik and  
19 interfere and damage his business and cause him severe emotional distress.  
20

21 26. Plaintiff Vanetik is informed and believes and based thereon alleges that the Halls and  
22 DOES from October 2022 through present have been engaged in deliberate smear campaign  
23 against Plaintiff Vanetik, his family, and his businesses.

24 27. Plaintiff Vanetik is informed and believes and, based thereon alleges that the fake posts by  
25 Defendants allege that Plaintiff is a notorious criminal and sex trafficker, that he has ties to  
26 dubious criminals, that he is bankrupt and that he engages in criminal behavior and is being  
27



1 investigated by U.S. State Department and various law enforcement agencies. All these  
2 claims are patently false and made with knowledge of their falsity out of utter malice  
3 directed at Plaintiff Vanetik by the Defendants.  
4

5 **FIRST CLAIM FOR RELIEF**  
6 **(Defamation Per Se)**  
7 **(Against All Defendants)**

8 28. Plaintiff realleges and incorporates by references paragraphs 1 through 27 as though fully set  
9 forth herein.

10 29. Defendants Brian and Michelle Hall and DOES, continue to conspire and make these false  
11 representations and statements as alleged herein, while knowing that their representations  
12 were materially false and designed with the intent to specifically injure the reputation of  
13 Plaintiff Vanetik. Each and all of those false, material representations were published to  
14 various media sources including Western media, East European media, and various internet  
15 third parties, and third parties that Plaintiff Vanetik has social, business, and political  
16 relationships with or that are aware of Plaintiff Vanetik's business and exert influence on it  
17 directly or indirectly.  
18

19 30. Defendants made these false representations, false submissions to social media and  
20 published on fake web sites in the hopes of damaging and destroying Vanetik's reputation  
21 and ultimately his interests in ventures that he is involved in globally. These false  
22 representations and false submissions were relied on by the various business leaders,  
23 politicians, and members of the legitimate press.  
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1 31. Plaintiff Vanetik has been substantially harmed as a result of the Defendant Brian Hall's  
2 defamatory conduct which injured the reputation and his business interests in an amount that  
3 is presently unknown but certainly in excess of the minimum jurisdiction of this Court.

4 32. Defendants knew that the representations, allegations against the Plaintiff were knowingly  
5 false and were made with the intent to harm and injure Vanetik.

6 33. The Defendants and each of them are guilty of recklessness, oppression, fraud and malice  
7 and, therefore, Plaintiff Vanetik is entitled to compensatory, punitive damages and recovery  
8 of attorney fees against each of them in an amount to be proven at the time of trial.

9 34. Defendants have caused general damages according to proof. They further have caused  
10 damage to Plaintiff's reputation and businesses in an amount of at least \$10,000,000.00 in  
11 monetary damages to be proven at the time of trial.  
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14 **SECOND CLAIM FOR RELIEF**

15 **Tortious Interference with Perspective Economic Advantage**

16 **(Against Defendant Brian Hall and DOES 1-50 Inclusive)**

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18 35. Plaintiff realleges and incorporates by references, as though set forth in  
19 full, paragraphs 1 through 34, above.

20 36. Defendants at all times were aware of various business relationships and contracts that  
21 Plaintiff Vanetik had with various businesses in Ukraine, Israel, Germany, and the U.S.  
22 based on his study of Plaintiff Vanetik's online and media footprint.

23  
24 37. By engaging in a social media campaign aimed to harass and damage Plaintiff Vanetik, the  
25 Defendants Brian and Michelle Hall and DOES' activity as alleged herein, has caused loss  
26 of business and reputation to Plaintiff Vanetik, in that the person who read the statements  
27

1 that stated Plaintiff was a criminal, sex trafficker, pedophile and client of Jeffrey Epstein  
2 were made with knowledge of their falsity.

3 38. Furthermore, the statements are online and expose Plaintiff to millions of readers who would  
4 understand that the statements were made about Plaintiff and could be believed by the  
5 readers of such statements and therefore cause the readers including clients, acquaintances  
6 and prospective business contacts to avoid having any interaction with Plaintiff, due solely  
7 to the false and harmful allegations.  
8

9 39. Defendants are guilty of recklessness, oppression, fraud and malice within the meaning of  
10 *Civil Code § 3294*. An award of punitive and exemplary damages is justified in an amount  
11 according to proof, which is unknown but in excess of the minimum jurisdiction of this  
12 Court.  
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14 40. Plaintiff further alleges that such conduct has damaged Plaintiff and his business interest in  
15 an amount that is at least \$10,000,000.00 to be proven at the time of trial.  
16

17 **THIRD CLAIM FOR RELIEF**

18 **Intentional Infliction of Emotional Distress**

19 **(Against Defendant Brian Hall and Does 1-50, Inclusive)**

20 41. Plaintiff realleges and incorporates by reference, as though set forth in  
21 full, paragraphs 1-40, above.

22 42. As stated above, in October 2022 Defendants Brian and Michelle Hall and DOES have  
23 chosen to retaliate against Plaintiff Vanetik by attacking him online via social media such as  
24 Twitter and Facebook by creating fake name accounts such as “Purple Rain”, “Greg  
25 MacDonald”, “Bill Cosby”, “Michael Huntsman”, and multiple others.  
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1 43. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendants,  
2 beginning approximately in October 2022, started posting vicious ad hominem attacks  
3 against Plaintiff Vanetik to cause emotional distress, financial harm, and reputational harm  
4 to Plaintiff Vanetik.

5 44. Plaintiff Vanetik is informed and believes and on that bases alleges that the documented and  
6 ongoing posts have been subject to forensic analysis and clearly show that they originate  
7 from the Defendants Brian and Michelle Hall and potentially DOES and reference an  
8 imposter web site created by the Defendants where they use Plaintiff Vanetik’s full name  
9 (Yuri\_Vanetik.com) where Defendants have posted false and malicious claims about  
10 Plaintiff Vanetik, his family, and business.

11 45. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendants are  
12 using an imposter web site, and fake accounts on Twitter and Facebook and are posting  
13 claims that Plaintiff Vanetik is a member of fringe terrorist organizations, is a criminal, and  
14 a client of notorious convicted pedophile and sex trafficker Jeffrey Epstein.

15 46. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendants use fake  
16 web sites and accounts; and engage and continue to systematically harass Plaintiff Vanetik,  
17 by attacking his ethnicity, physical characteristics, and alleging that he is, inter alia, did not  
18 pass law school and college exams and is engaged in criminal activity. Despite the  
19 outlandish and false nature of Defendants’ claims each and all Defendants have been  
20 including hashtags and posting on chat of Plaintiff Vanetik’s associates and clients causing  
21 him grave economic harm and reputational harm.  
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1 47. Plaintiff Vanetik is informed and believes and on that basis alleges that Defendants and each  
2 of them have also posted false and malicious statements about Plaintiff Vanetik's parents,  
3 asserting that they are criminals.

4 48. The above conduct by definition is extreme and outrageous behavior that was undertaken by  
5 Defendants and others who are presently unknown and are hereby known only as DOES at  
6 this point in time.  
7

8 49. The Defendants acted intentionally as their threats and actions were designed to cause and  
9 did cause extreme emotional distress. In fact, the actions were tantamount to a terrorist  
10 threat, as the Defendants and each of them unlawfully claimed that Plaintiff Vanetik is a  
11 criminal and sex offender who lied about his education and professional licensing.  
12

13 50. The conduct has injured, harmed Plaintiff in an amount that is in excess of the minimum  
14 jurisdiction of this court, which will be proven at the time of trial.

15 51. Plaintiff also prays for punitive damages in an amount that will punish and deter others from  
16 engaging in such extreme, outrageous, malicious and vile conduct in an amount that will  
17 exceed the minimum jurisdiction of this Court.  
18

19 **DEMAND FOR JURY TRIAL**

20 Plaintiff hereby demands a trial by jury of all issues so triable in the present action.  
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1       **WHEREFORE**, Plaintiff prays for judgment against Defendants, as follows:

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3       **On The First Claim for Relief**


- 4       1. For general damages according to proof;
- 5       2. For Special Damages of at least \$10,000,000.00;
- 6       3. For Punitive Damages according to Proof;
- 7       4. For prejudgment interest according to statute;
- 8       5. For Plaintiffs' reasonable attorneys' fees and costs according to statute; and
- 9       6. For Attorney's fees and costs according to statute.

10  
11       **On Causes of Action 2 and 3 Claims for Relief:**

- 12       1. For general damages according to proof;
- 13       2. For compensatory, and Special Damages according to proof but amounting to at least
- 14       \$10,000,000.00;
- 15       3. For prejudgment interest on all amounts found to be due to Plaintiff from Defendants,
- 16       at the legal rate.
- 17       4. For punitive damages and exemplary damages according to proof at the time of trial,
- 18       5. For attorney's fees according to statute according to proof, and
- 19       6. For such other and further relief in favor of Plaintiff as the Court deems
- 20       just and proper.

21  
22       DATED: November 16, 2022

A.G. ASSANTI & ASSOCIATES, PC

23  
24         
25       Alessandro G. Assanti, Esq.,  
26       Attorney for Plaintiff Yuri Vanetik