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6 PLAINTIFF IN PRO PER

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

9 DIINELE DINAALI, an individual,
10 Plaintiff,
11 vs.

12 MORGAN E. PIETZ, an individual;
13 SHEIN DISTRIBUTION CORPORATION, a
14 Delaware corporation;
15 SHEIN GROUP LTD., a Singapore
16 corporation
17 SHEIN US SERVICES LLC, a California
18 corporation;
19 ZOETOP BUSINESS CO., LTD., a Hong Kong
20 corporation;
21 CHRIS XU, a/k/ XU YANGTIAN, an
22 individual;
23 YUNAN XHU, an individual;
24 TAN-HO CHAO, an individual;
25 BLYTHE GOLAY, an individual;
26 SPEEDX, a New York corporation;
27 CHRIS ZHENG, an individual;
28 BROWNSTEIN HYATT FARBER SCHRECK,
LLP, a Colorado corporation;
NORMAN BROWNSTEIN, an individual;
RICHARD BENSON, an individual;
ERIC D. WALTHER, an individual;
NAME.COM, INC., a Delaware Corporation;
IDENTITY DIGITAL INC., a Washington
corporation;
AKRAM J. ATALLAH, an individual;
CAMERON WALKER, an individual;
DAVE MCBREEN, an individual;

CASE NO: 25STCV15174
DEPT: 57
[Hon. Maurice A. Leiter]

FIRST AMENDED COMPLAINT FOR:

- 1- BREACH OF CONTRACT**
- 2- PERSONAL INJURY – PRODUCT-RELATED TRAUMA**
- 3- FALSE ADVERTISING - CAL. BUS. & PROF. CODE § 17500**
- 4- FALSE ADVERTISING - CAL. BUS. & PROF. CODE § 17500**
- 5- UNFAIR COMPETITION – CAL. BUS. & PROF. CODE § 17200**
- 6- NEGLIGENT BREACH OF CONTRACT**
- 7- CIVIL RICO – 18 U.S.C. § 1962(c)**
- 8- CIVIL RICO CONSPIRACY – 18 U.S.C. § 1962(d)**
- 9- VIOLATION OF CIVIL RIGHTS – 42 U.S.C. § 1983**
- 10- FRAUD**
- 11- TORTIOUS INTERFERENCE WITH CONTRACT**
- 12- TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**
- 13- NEGLIGENT MISREPRESENTATION**
- 14- CIVIL CONSPIRACY**
- 15- UNJUST ENRICHMENT**
- 16- UNAUTHORIZED PRACTICE OF LAW - CAL. BUS. & PROF. CODE §§ 6125–6126**
- 17- FRAUD (EXTRINSIC AND EXTRAJUDICIAL)**
- 18- INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
- 19- DECLARATORY AND INJUNCTIVE RELIEF**

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DOES 1-10;
ROE CORPORATIONS 1-10, inclusive;
Defendants.

[DEMAND FOR JURY TRIAL]

Complaint Filed: May 27, 2025
Trial Date: Not Set

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1 **FIRST AMENDED COMPLAINT**

2 **I- INTRODUCTION**

3 1- This is a case about coordinated abuse of process, fraud, and unfair business practices
4 perpetrated by a network of corporations, attorneys, and technology platforms to suppress a
5 whistleblower, destroy access to public information, and retaliate against a private citizen
6 attempting to expose deceptive business practices.

7 2- Plaintiff, a transgender consumer and advocate, was targeted by an enterprise involving
8 SHEIN DISTRIBUTION CORPORATION (“Shein”), an online retail giant, its executives, attorneys,
9 legal agents from law firm of BROWNSTEIN HYATT FARBER SCHRECK LLP (“BHFS”), and their
10 partner, and domain service providers including NAME.COM, INC. (“Registrar”) and IDENTITY
11 DIGITAL INC. (“IDI”).

12 3- The pattern of misconduct includes business domain takedowns, fraudulent acts,
13 malicious interference with contracts, and the use of coordinated falsehoods to disrupt Plaintiff’s
14 legal efforts and business interests.

15 **II- PARTIES**

16 4- Plaintiff DIINELE DINAALI (“Plaintiff”) is an individual residing in the County of Los
17 Angeles in State of California and Las Vegas, Nevada.

18 5- Plaintiff is a customer of Shein’s and operated lawful websites critical of company’s
19 business practices at all relevant times.

20 6- Defendant MORGAN E. PIETZ (“Pietz”) is an attorney from the law firm of Pietz &
21 Shahriari LLP who is a fixer aiding and abetting Shein and BHFS and is engaged in unlawful
22 litigation conduct and extrajudicial interference on behalf of corporate defendants.

23 7- Defendant Shein is a Delaware-based corporation operating in California as an out-of-
24 state corporation based in Los Angeles County which retaliated against Plaintiff in a malicious and
25 unlawful manner depriving Plaintiff of all her constitutional rights to freedom of speech and
26 government redress.

27 8 Defendant SHEIN GROUP LTD. (“SGL”), Shein’s parent company, is an international
28 corporate entity based in Singapore and involved in the central management of the Shein brand.

9- Defendant SHEIN US SERVICES LLC (“SUS”) is a California-based subsidiary and domestic

1 arm of the international Shein conglomerate.

2 10- Defendant ZOETOP BUSINESS CO., LTD. (“Zoetop”) is a Hong Kong based corporation
3 and affiliated entity to Shein.

4 11- Defendant CHRIS XU a/k/ XU YANGTIAN (“Xu”), is the founder and chief executive
5 officer of the Shein Group.

6 12- Defendant YUNAN XHU (“Xhu”) is Shein’s general counsel.

7 13- Defendant TAN-HO CHAO (“Chao”) is an attorney employed by Shein.

8 14- Defendant BLYTHE GOLAY KOCHSIEK (“Kochsiek”) is an attorney employed by Shein.

9 15- Defendant SPEEDX (“SpeedX”) is a New York based corporation providing logistic
10 services for Shein in several states.

11 16- SpeedX drivers, who operate as independent contractors in a manner similar to Uber
12 drivers, have developed a widespread reputation for theft, as evidenced by numerous complaints
13 on consumer and business review platforms. According to reports from thousands of SpeedX
14 customers, packages are routinely stolen by the very drivers assigned to deliver them. In many
15 cases, drivers are alleged to take staged photographs to falsely confirm delivery, only to retrieve
16 the packages immediately thereafter and taking off with them. These drivers never attempt to
17 knock and deliver to the recipient personally.

18 17- Defendant CHRIS ZHENG (“Zheng”) is the founder of SpeedX whose delivery drivers
19 have been responsible for theft of Plaintiff’s purchases from Shein on a number of occasions.

20 18- Defendant BHFS is a law firm with offices in California, Nevada, and several states
21 across United States representing Shein in a Nevada civil action, and its employees are complicit in
22 criminal conspiracy against Plaintiff.

23 19- Defendant NORMAN BROWNSTEIN (“Brownstein”) is the founder of BHFS, and
24 complicit in criminal conspiracy against Plaintiff.

25 20- Defendant RICHARD BENSON (“Benson”) is the managing partner of BHFS, and
26 complicit in criminal conspiracy against Plaintiff.

27 21- Defendant ERIC D WALTHER (“Walther”) is a partner with BHFS, and is complicit in
28 criminal conspiracy against Plaintiff.

22- Defendant Registrar is a domain registrar headquartered in Denver, Colorado, and

1 doing business in California from whom Plaintiff, who is a web developer, purchases her domain
2 names.

3 23- Defendant IDI is a domain registry and the parent company of Registrar.

4 24- Defendants AKRAM J. ATALLAH (“Atallah”), CAMERON WALKER (“Walker”), DAVE
5 MCBREEN (“McBreen”), (collectively, “Registrar’s Officers”) are officers or executives of Registrar
6 and/or IDI, (collectively, “Registrar”), acting under color of authority during the events described
7 herein.

8 25- Defendants Shein, SGL, SUS, and Zoetop are collectively referred to as Shein herein.

9 26- Above-named defendants are collectively referred to as Defendants herein.

10 27- Plaintiff is currently unaware of the true names and capacities of Does 1–10 and will
11 amend as necessary.

12 28- Plaintiff is currently unaware of the true names and capacities of Roe Corporations 1–
13 10 and will amend as necessary.

14 **III- JURISDICTION AND VENUE**

15 29- This Court has subject matter jurisdiction over this action pursuant to Article VI, Section
16 10 of the California Constitution and the California Code of Civil Procedure because the amount in
17 controversy exceeds the jurisdictional minimum of this Court and includes claims for equitable and
18 injunctive relief, damages, and statutory penalties.

19 30- This Court has personal jurisdiction over each Defendant because:

- 20 • Defendants are residents of, incorporated in, or regularly do business in California;
- 21 • The acts and omissions giving rise to this action occurred in or were directed at California;
22 and/or
- 23 • Defendants purposefully availed themselves of the privilege of conducting business within
24 California, including by advertising, selling, contracting, litigating, and managing content
25 and services through California-based entities.

26 31- General jurisdiction exists over Defendants domiciled or headquartered in California,
27 including but not limited to Shein, and BHFS.

28 32- Specific jurisdiction exists over all Defendants because Plaintiff’s claims arise out of and
relate to Defendants’ conduct within California, including tortious interference, fraudulent

1 misrepresentations, business operations, service contracts, and participation in coordinated legal
2 and technological takedown efforts affecting Plaintiff's rights.

3 33- Venue is proper in the County of Los Angeles under Code of Civil Procedure § 395(a)
4 because:

- 5 • A substantial portion of the events and omissions giving rise to this action occurred in this
6 County;
- 7 • One or more Defendants maintain offices or conduct business in this County;
- 8 • The harm suffered by Plaintiff occurred in part in this County; and
- 9 • Plaintiff previously filed related litigation in this jurisdiction, which establishes continuity
10 and judicial economy.

11 34- This Court has authority to hear federal claims pursuant to concurrent jurisdiction,
12 including causes of action under 18 U.S.C. § 1962(c) and (d) ("Civil RICO").

13 35- This Court also has concurrent jurisdiction over Plaintiff's federal civil rights claims
14 under 42 U.S.C. § 1983, as California state courts are fully empowered to adjudicate federal
15 constitutional violations where state actors or those acting under color of law have deprived a
16 party of rights secured by the Constitution and federal statutes such as is the case here.

17 **IV- JURISDICTIONAL DISCLAIMER REGARDING PRIVILEGE AND ANTI-SLAPP**

18 36- In a related matter filed in Nevada, Plaintiff amended her complaint to limit the action
19 to a single cause of action and distinguish it from this California action so as not to invoke the first-
20 to-file rule.

21 37- Despite these efforts, Defendants knowingly misrepresented the nature of the Nevada
22 case, distorted the record, and falsely asserted anti-SLAPP applicability by submitting a perjured
23 declaration authored by Defendant Walther in collusion with Pietz.

24 38- In order to prevent similar abuse and record manipulation in this action, Plaintiff sets
25 forth this express disclaimer to clarify that no part of this pleading is based on protected legal
26 petitioning, but rather on a coordinated campaign of extrajudicial misconduct and fraud.

27 39- Plaintiff expressly alleges that the conduct giving rise to this action falls outside the
28 scope of any litigation privilege under California Civil Code § 47(b) and is not protected activity
under California's anti-SLAPP statute, Code of Civil Procedure § 425.16.

1 40- The wrongful acts described herein—including but not limited to fraudulent
2 misrepresentations to third parties, retaliatory takedown actions, abuse of administrative and
3 platform processes, coordinated interference with legal rights, and obstruction of access to
4 services—are extrajudicial in nature and were undertaken for retaliatory and commercial
5 suppression purposes, not as legitimate advocacy or petitioning.

6 41- Plaintiff's allegations are based on conduct that occurred outside the courtroom and
7 outside the scope of judicial proceedings, and which involved deception, bad faith, and unlawful
8 commercial coordination.

9 42- As such, Defendants' conduct is not privileged and is not subject to the procedural
10 protections of the anti-SLAPP statute.

11 43- Plaintiff further disclaims any intent to chill lawful litigation, and seeks only to hold
12 Defendants accountable for non-privileged, tortious, and conspiratorial conduct occurring outside
13 the boundaries of protected legal activity.

14 44- Plaintiff is actively seeking criminal prosecution and disciplinary actions against all
15 named Defendants by filing formal complaints with the Attorneys General and State Bar
16 associations of all affected jurisdictions, including but not limited to California, Nevada, Colorado,
17 Washington, and District of Columbia for the torts alleged herein which deprives the Defendants
18 of the anti-SLAPP privileges and protections.

19 **V- BACKGROUND**

20 45- Plaintiff is an artist, musician, and consumer advocate who used her creative platform
21 and website to expose unethical and potentially illegal business practices by corporate retailers
22 including Shein and its affiliated entities during the course of a litigation process for breach of
23 contract brought by Plaintiff in California and Nevada.

24 46- Plaintiff's dispute with Shein began after she placed multiple orders through Shein's
25 online platform, many of which were shipped through SpeedX, a delivery partner contracted by
26 Shein. Several packages were never delivered, and Plaintiff later learned that SpeedX driver had
27 stolen them. When Plaintiff contacted Shein for a refund, Shein denied the request.

28 47- In response to Plaintiff's repeated attempts to demand accountability and seek redress,
Shein retaliated by disabling Plaintiff's ability to post reviews on its website, thereby silencing her

1 from publicly warning other consumers.

2 48- Shein falsely claimed that Plaintiff had violated its Terms of Service, yet, to this day,
3 Shein has failed to provide any explanation or evidence as to what term was allegedly violated.

4 49- This action was a clear act of retaliatory suppression of consumer speech.

5 50- Plaintiff originally sought relief through the small claims division, filing an initial claim in
6 an attempt to resolve the dispute in a limited and expedited setting.

7 51- However, that effort was thwarted when the presiding judge, Honorable Emma Castro,
8 influenced by a fabricated and unsupported claim submitted by Shein, continued the hearing
9 without allowing Plaintiff to even utter a word or present her case.

10 52- The judge then ordered Plaintiff who was residing in Nevada at the time to appear in
11 person at the next hearing, this while the dispute should have been adjudicated there and then.

12 53- Shen was obviously avoiding answering a subpoena issued by Plaintiff who sought to
13 know (a) how to contact SpeedX who is unreachable by consumers, and (b) what terms of contract
14 she had violated that resulted in her suspension.

15 54- Plaintiff later discovered that the judge was tainted by outside influence and
16 improperly biased, compromising the integrity of the proceeding.

17 55- Following this miscarriage of justice, and upon learning that she had suffered personal
18 injury caused by Shein's products, Plaintiff determined that the scope of the harm was far greater
19 than could be addressed in small claims court where she had no option to appeal the ruling of a
20 biased judge.

21 56- Plaintiff then resorted to filing a full civil litigation complaint, only to discover that at
22 nearly every turn, Shein and its powerful attorneys from BHFS, a massive firm with over four
23 hundred and twenty employees, appeared to be exerting improper influence on judicial officers
24 and manipulating court outcomes through frivolous and unlawful tactics led by Pietz.

25 57- These experiences demonstrate not only a pattern of retaliation and suppression, but
26 also a clear abuse of legal process and institutional power used to deprive Plaintiff of a fair and
27 impartial forum by Pietz who is practicing in Nevada without even being licensed in the state.

28 58- Plaintiff brings this case not only to recover for the substantial personal and economic
harm suffered, but also to expose and challenge the structural abuses that allowed such retaliation

1 to occur unchecked.

2 59- Shein's conduct escalated after Plaintiff created protest websites to document the
3 experience and expose unethical practices.

4 60- The sites that triggered Shein's retaliatory acts included: (1) shein.pictures, (2)
5 bhfs.online, (3) emmacastro.online, (4) ericdwalthers.com, (5) madysonbathke.com, and (6)
6 morganpietz.com.

7 61- Shein, in response, conspired and coordinated with Registrar to target and take down
8 not only the protest sites but also Plaintiff's unrelated personal domain, diinele.com, which
9 contained artistic, biographical, and professional content that had no connection whatsoever to
10 the dispute.

11 62- The basis for this suit includes retaliatory conduct that escalated when Defendants
12 Pietz and Walther, acting in coordination with Shein and others, contacted Registrar and initiated
13 the takedown of Plaintiff's websites by resorting to fraud.

14 63- These websites were lawfully published protest pages critical of Shein's unethical
15 business practices.

16 64- Pietz and Walther intentionally misrepresented the content as spam in
17 communications with low-level overseas support agents affiliated with Registrar, knowing that
18 such agents lacked the legal training or authority to properly evaluate the matter.

19 65- Without any legal process or factual justification, the protest sites were ordered to be
20 removed within twenty-four hours of the notice violating Plaintiff's rights and obstructing her
21 ability to communicate publicly about her claims and grievances.

22 66- Registrar did not even have the legal authority to do so as the websites were not
23 hosted on their servers.

24 67- Shein mistakenly assumed that Registrar was the host, threatened a low-level \$1.50 an
25 hour tech support who out of sheer fear of a lawsuit at the hands of a giant law firm ordered the
26 take-downs without any investigation at all or any input from Plaintiff.

27 68- In connection with the takedown of Plaintiff's website, Defendant Registrar issued
28 takedown demands without identifying the complainant or legal basis.

69- Plaintiff responded immediately in protest but was ultimately forced to take down the

1 referenced protest pages under protest after no response was received from Registrar.

2 70- Even after Plaintiff immediately contacted the Registrar to contest the takedown while
3 opening a support ticket requesting explanation and provided documentation proving that the
4 sites were legitimate and noncommercial, Registrar refused to reinstate the content or provide a
5 credible explanation.

6 71- Registrar has similarly dodged responding to subpoenas regarding the matter.

7 72- In fact, Registrar has failed to contact Plaintiff regarding the matter at all since April 22,
8 2025 when the orders were issued.

9 73- Plaintiff subsequently notified Registrar in writing that unless the matter was clarified
10 and documents provided, Plaintiff would file suit.

11 74- When no response came, Plaintiff amended her complaint to include Registrar and its
12 officers and simultaneously gave Registrar the opportunity to resolve the matter informally.

13 75- Plaintiff even offered to settle the matter amicably without any monetary demand,
14 requesting only that Registrar provide basic transparency, identify the source of the complaints,
15 and agree not to interfere with Plaintiff's online content moving forward.

16 76- Despite these reasonable overtures, Registrar ignored all efforts at resolution and
17 continues to withhold access and information to this day.

18 77- These acts were not the result of neutral policy enforcement, but rather part of a
19 broader scheme of suppression and digital censorship carried out by Shein, its legal
20 representatives, and infrastructure providers, in direct retaliation against Plaintiff's protected
21 activities.

22 78- Repeated requests by Plaintiff to obtain information or restore the domain were
23 ignored.

24 79- Plaintiff has since filed three separate ex parte applications for temporary restraining
25 orders ("TROs") in state courts seeking emergency relief to prevent ongoing and irreparable harm.

26 80- Each application was denied under circumstances that raise serious concerns of
27 collusion between Defendants and the assigned judges, who refused to address the facts or
28 enforce Plaintiff's rights and dismissed the application summarily.

81- In one instance, the judge dismissed the case immediately after an unlawful ex parte

1 Communication.

2 82- In one instance, the judge dismissed the case immediately after ex parte
3 communication with Shein one day prior to the case even coming before the judge.

4 83- These denials were not based on legal merit, but appeared to reflect a coordinated
5 effort to obstruct Plaintiff's access to equitable remedies.

6 84- The judges' disregard of uncontroverted evidence, refusal to allow hearings, and
7 procedural irregularities strongly suggest undue influence and improper coordination with
8 Defendants or their legal counsel.

9 85- As a result of this apparent judicial collusion and the pattern of coordinated retaliation,
10 Plaintiff has initiated formal criminal, administrative, and ethical complaints against all named
11 Defendants and participating court officials.

12 86- Plaintiff has filed or is in the process of filing complaints with the following agencies
13 and authorities: United States Department of Justice (DOJ), Federal Bureau of Investigation (FBI),
14 California and Nevada Attorneys General, California, Nevada, Washington, Colorado and DC State
15 Bars, as well as California and Nevada judicial oversight commissions.

16 87- Plaintiff is pursuing complaints under applicable federal and state criminal statutes,
17 including perjury, obstruction of justice, bribery, acceptance of bribery, wire fraud, conspiracy to
18 commit fraud, and unlawful takedown practices.

18 88- The injury to Plaintiff has been physical, emotional, financial and personal.

19 89- As a transgender woman building her career and truth-telling platform, the removal of
20 her site caused reputational harm, cut off artistic and commercial opportunities, and left her
21 vulnerable to further abuse.

22 90- On or about May 30, 2025, Plaintiff was contacted by an attorney for Registrar seeking
23 an extension of time to respond.

24 92- Although the request for delay appeared unjustified given prior notice and ample time
25 to investigate, Plaintiff made a good faith offer to resolve the matter if Registrar would simply
26 identify the basis of the original complaint and confirm that no further action would be taken
27 against Plaintiff's websites.

28 93- Plaintiff advised that if Registrar declined to settle, the pending case against it would be

1 dismissed and refiled under new circumstances.

2 94- This was necessary because the presiding judge in that matter, the Honorable Michael
3 Small, was acting in clear collusion with Defendants, violating Plaintiff's due process rights, and
4 refusing to disqualify himself despite the filing and service of a valid Statement of Disqualification.

5 95- Plaintiff had further warned that she was actively pursuing criminal prosecution against
6 any judicial officer found to be colluding with Defendants, as occurred previously with the Nevada
7 judge, the Honorable Gloria Sturman.

8 96- All of the involved judges are currently subject of Plaintiff's request for administrative
9 and criminal referrals.

10 97- This offer did not involve any monetary demand.

11 98- Registrar refused to meet and confer to consider the offer and its counsel threatened
12 that if Plaintiff refiled her case, she would seek to have it reassigned to the same judge involved in
13 the prior version of the case—indicating knowledge of coordinated legal strategy and prior judicial
14 manipulation.

15 99- These actions by Registrar—including its silence, refusal to cooperate, failure to honor
16 subpoenas, and procedural threats—support the inference that Registrar was not acting
17 independently, but rather in coordination with Shein and other co-defendants.

18 100- Their refusal to assist Plaintiff, even when offered dismissal without compensation,
19 demonstrates a shared enterprise objective of silencing, obstructing, and economically damaging
20 Plaintiff, as part of a broader retaliatory scheme.

21 101- These facts further support Plaintiff's claims for civil conspiracy, RICO violations, and
22 unfair business practices, as Registrar's conduct cannot be explained by routine registrar
23 procedure or neutral platform enforcement.

24 102- This lawsuit seeks to hold each participant accountable in the coordinated
25 suppression and interference that injured Plaintiff's business, property, personhood, and access to
26 justice.

27 103- Plaintiff has made settlement offers to Defendants to avoid this filing but Defendants
28 are operating under directive from Xu who is known as a brutal businessman, and a Fascist to
continue with the litigation so that Plaintiff could be declared a vexatious litigant.

1 **CAUSES OF ACTION**

2 **FIRST CAUSE OF ACTION: BREACH OF CONTRACT**

3 **(Against Shein and its officers)**

4 104- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
5 fully set forth herein.

6 105- At all relevant times, Defendants entered into an express or implied agreement with
7 Plaintiff to engage in lawful and fair business practices and to respect Plaintiff's consumer rights
8 under California law and industry norms.

9 106- Plaintiff performed all obligations required under the agreement, including purchase
10 of products, engagement with services, and other conduct that gave rise to duties on Defendants'
11 part.

12 107- Defendants breached their contractual obligations by:

- 13 • Failing to honor terms of service and consumer-facing representations;
- 14 • Engaging in coordinated efforts to suppress criticism and retaliate against Plaintiff;
- 15 • Interfering with Plaintiff's use of lawfully obtained materials and consumer rights;
- 16 • Refusing to comply with lawful subpoenas issued in connection with litigation involving
17 Plaintiff's rights as a consumer and critic;
- 18 • Enabling or encouraging outside parties to block Plaintiff's online platforms through
19 deception and misrepresentation.

20 108- Defendants' breach was willful and in bad faith, violating Plaintiff's reasonable
21 expectations as a participant in the consumer-provider relationship.

22 109- As a direct and proximate result, Plaintiff suffered damages including but not limited
23 to: loss of access to digital infrastructure, economic harm, reputational damage, and litigation
24 costs.

25 110- Plaintiff seeks compensatory and consequential damages in an amount to be proven
26 at trial, as well as all available equitable relief.

27 **SECOND CAUSE OF ACTION: PERSONAL INJURY – PRODUCT-RELATED TRAUMA**

28 **(Against Shein and its officers)**

111- Plaintiff realleges and incorporates by reference all preceding paragraphs as though

1 fully set forth herein.

2 112- Beginning in or around 2022, Plaintiff, a transgender woman, lawfully purchased and
3 used thousands of dollars' worth of clothing, shoes, accessories, and performance materials sold
4 under the Shein brand, both as part of her gender transition and in connection with her work as a
5 professional artist and performer.

6 113- Plaintiff relied on the implied and express representations made by Defendants that
7 Shein's products were safe, suitable for human use, and free from harmful chemicals or toxins.

8 114- During this period, Plaintiff developed chronic respiratory and sinus issues, including
9 inflammation and discomfort in the nasal cavity, which became increasingly severe.

10 115- On Christmas Eve 2024, Plaintiff was struck in the face with a rock during an unrelated
11 assault by a MAGA cap wearing violent zealot who disapproved of Plaintiff's outfit resulting in
12 nasal trauma and breathing complications.

13 116- A subsequent emergency room diagnosis revealed a non-displaced nasal fracture and
14 nasal calcification.

15 117- Plaintiff is informed and believes, and on that basis alleges, that the nasal calcification
16 and related injuries were exacerbated or directly caused by chronic exposure to undisclosed or
17 hazardous chemical agents contained in Shein products previously worn or handled by Plaintiff.

18 118- These toxic exposures were magnified in the context of repetitive use, and storage of
19 large volumes of Shein clothing in confined indoor spaces for creative work.

20 119- Plaintiff will present medical records and expert testimony supporting the theory that
21 the calcification and associated injury is at least partially attributable to chronic inhalation or
22 dermal exposure to chemical substances originating from Shein's products.

23 120- Defendants knew or should have known that their products were being sold and
24 marketed to vulnerable consumers, including members of the LGBTQ+ and performing arts
25 communities, and failed to warn of potential toxic hazards.

26 121- Defendant Shein has been sued multiple times for its use of toxic materials in its
27 products.

28 122- In fact, the law firm of Adamson Adhoot specializes in suing Shein for the very same
reason advertising at <https://aa.law/accident/shein-lawsuit-defective-product>.

1 123- Plaintiff suffered serious and ongoing physical injury, including nasal obstruction,
2 chronic pain, breathing impairment, and the need for invasive diagnostic and corrective
3 procedures.

4 124- Plaintiff's injury appears permanent in nature as after more than five months of
5 treatments, no improvement to her health has been achieved.

6 125- This has caused unbearable physical and emotional distress, financial expense, travel
7 burdens, and ongoing medical complications.

8 126- Plaintiff suffered two distinct forms of injury as a result of this assault on her during
9 the incident on Christmas Eve 2024.

10 127- First, she was physically suffering from chronic exposure to toxic substances
11 embedded in SHEIN's clothing and products, which she wore and utilized regularly as part of her
12 gender transition and artistic expression.

13 128- Second, Plaintiff was subjected to a violent assault wearing Shein's women's clothing
14 motivated, in large part, by anti-LGBT hate and misinformation proliferated in connection with
15 national political discourse and rising hostility toward transgender individuals.

16 129- Plaintiff continues to suffer and is still undergoing treatment caused by the injuries as
17 of this filing.

18 **THIRD CAUSE OF ACTION: FALSE ADVERTISING – BPC § 17500**

19 **(Against Shein and its officers)**

20 130- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
21 fully set forth herein.

22 131- This cause of action arises under California Business & Professions Code § 17500,
23 which prohibits any person, corporation, or entity from making or disseminating false or
24 misleading statements in connection with the marketing, sale, or provision of goods or services in
25 California.

26 132- Defendants Shein advertises and sells clothing and consumer goods to California
27 consumers through online platforms.

28 133- As part of its marketing and sales process, Shein promotes fast, secure, trackable, and
reliable delivery services and represents that customers will receive support in the event of a

1 delivery issue or dispute.

2 134- In practice, Shein uses SpeedX as a key shipping partner to fulfill orders, including
3 Plaintiff's. However, SpeedX does not provide customers with any valid or functioning contact
4 method, support channel, or resolution pathway. Its website is bot-operated, offers no access to
5 human support, and fails to disclose meaningful contact details. Consumers have no method to
6 recover or inquire about missing, delayed, or misdelivered packages.

7 135- Furthermore, Shein lists addresses for its offices that are not open or accessible to the
8 public. When Plaintiff attempted to locate or contact Shein's California offices in order to resolve
9 concerns and serve legal documents, she was unable to access the premises or reach a physical
10 office capable of handling complaints or receiving notices.

11 136- This contradicts representations made on Shein's website and to regulatory bodies
12 regarding a U.S. "headquarters" or fulfillment base.

13 137- These practices amount to false and misleading advertising because Shein and SpeedX
14 create the impression that consumers can expect full-service delivery protections and responsive
15 support — when in reality, they outsource fulfillment to a ghost operation and maintain no
16 accessible infrastructure for resolving problems.

17 138- Shein's marketing campaign and order fulfillment pipeline relies on omissions and
18 half-truths. Nowhere are consumers warned that they will not be able to track or resolve
19 complaints through standard means, and Shein fails to disclose that it employs a delivery vendor
20 that shields itself from accountability.

21 139- Plaintiff, and consumers like her, relied on these representations in making purchasing
22 decisions, and suffered harm as a result.

23 140- Plaintiff was unable to resolve disputes, track important deliveries, or engage in
24 complaint resolution.

25 141- Plaintiff suffered economic harm, lost business opportunities, and reputational
26 damage.

27 142- The conduct of both Shein and SpeedX is likely to deceive a reasonable consumer, and
28 constitutes a violation of BPC § 17500.

143- Plaintiff seeks:

- Injunctive relief to prevent further false advertising;
- Restitution for losses incurred;
- Civil penalties under BPC § 17500;
- A judicial referral for misdemeanor prosecution of responsible individuals.

FOURTH CAUSE OF ACTION: FALSE ADVERTISING – BPC § 17500

(Against SpeedX, and Chris Zheng Individually)

144- Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.

145- This cause of action also arises under California Business & Professions Code § 17500.

146- Defendant SpeedX, under the direction and leadership of its founder and CEO Zheng, falsely advertises to the public that it provides reliable, trackable, and secure delivery services. On its website and through its commercial contracts, SpeedX claims to offer:

- Package tracking for consumers;
- Customer service and support;
- Reliable “last-mile” delivery;
- An operational interface through which consumers can seek redress.

These representations are materially false and misleading. In reality:

- SpeedX does not provide functional tracking;
- There is no accessible customer service, no working contact number, and no human support available;
- The company’s website is operated by an automated bot that never connects the user to a live representative;
- There is no physical customer-facing business address;
- Communications submitted by Plaintiff and others are never responded to;
- Customers have no realistic way to file complaints, recover stolen items, or reach a live agent;
- SpeedX uses a driver model with rampant complaints of theft, further exacerbating consumer harm.

147- Shein and its affiliated entities knowingly contract with SpeedX and integrate these

1 false advertising representations into their own marketing and fulfillment process.

2 148- Shein thereby reinforces and profits from SpeedX's deception by passing along false
3 assurances of shipping quality, tracking, and customer support to consumers.

4 149- Plaintiff and the public are routinely deceived by these false statements.

5 150- Plaintiff, in particular, suffered multiple stolen packages, no refunds, no tracking, and
6 total silence from both Shein and SpeedX despite repeated outreach.

7 151- These false statements are likely to deceive a reasonable consumer and have caused
8 Plaintiff and others substantial economic harm, frustration, and lost opportunities.

9 152- Plaintiff further alleges that the conduct of SpeedX, and particularly Zheng, was
10 knowing, willful, and criminal under BPC § 17500, which classifies such deceptive advertising as a
11 misdemeanor offense. Plaintiff reserves the right to seek and pursue criminal referral of Zheng
12 individually, and any other officers responsible, to the appropriate prosecutorial authorities for
13 misdemeanor violations under the statute.

14 153- Plaintiff seeks:

- 15 • Injunctive relief to prevent further false advertising;
- 16 • Restitution for losses incurred;
- 17 • Civil penalties under BPC § 17500;
- 18 • A judicial referral for misdemeanor prosecution of responsible individuals.

19 **FIFTH CAUSE OF ACTION: UNFAIR COMPETITION – CAL. BUS. & PROF. CODE § 17200**
20 **(Against All Defendants)**

21 154- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
22 fully set forth herein.

23 155- Defendants engaged in unlawful, unfair, and fraudulent business practices, including:

- 24 • Takedowns based on false pretenses;
- 25 • Coordination with other private entities to suppress content;
- 26 • Abuse of legal process to intimidate Plaintiff.

27 156-Plaintiff seeks restitution, injunctive relief, and all remedies available under the UCL
28 and any remedy available under the statute.

157- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

1 **SIXTH CAUSE OF ACTION: NEGLIGENT BREACH OF CONTRACT**

2 **(Against Registrar and its officers)**

3 158- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
4 fully set forth herein.

5 159- At all relevant times, Plaintiff entered into a valid and enforceable contract with
6 Registrar for domain name registration and related web services.

7 160- As part of that contractual relationship, Registrar owed Plaintiff not only contractual
8 duties, but a duty of care to exercise reasonable diligence and industry-standard safeguards in
9 handling Plaintiff's account, digital property, and any disputes or third-party interference.

10 161- Plaintiff fully performed all duties under the contract, including payment of fees,
11 compliance with terms, and lawful use of services.

12 162- Defendants breached their contractual obligations through negligence, including but
13 not limited to:

- 14 • Disabling Plaintiff's domain without due process or valid justification;
- 15 • Failing to notify Plaintiff of any third-party claims or complaints prior to takedown;
- 16 • Refusing to respond to Plaintiff's subpoena or provide a means to cure the service
17 disruption;
- 18 • Misclassifying or mishandling Plaintiff's account in a manner inconsistent with industry
19 practices and Plaintiff's contractual rights.

20 163- Defendants' actions were not only in breach of contract but were performed without
21 reasonable care, in violation of the duties arising from the service relationship.

22 164- As a direct and proximate result, Plaintiff suffered substantial economic loss,
23 reputational harm, and legal costs related to reestablishing her online presence and protecting her
24 rights.

25 165- Plaintiff seeks restitution of all amounts paid to Registrar in connection with the
26 registration, maintenance, and management of Plaintiff's domain, which were rendered worthless
27 or unusable as a result of Defendants' negligent breach of their contractual obligations.

28 166- Plaintiff further seeks equitable restitution for the wrongful deprivation of control
over Plaintiff's digital property and online platform, including the value of lost access, disruption of

1 operations, and harm to Plaintiff’s business income, reputation and consumer engagement.

2 167- Most importantly, Plaintiff seeks restoration of access, and measures to prevent
3 further negligence or interference.

4 **SEVENTH CAUSE OF ACTION: CIVIL RICO – 18 U.S.C. § 1962(c)**
5 **(Against All Defendants)**

6 168- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
7 fully set forth herein.

8 169- This cause of action is brought pursuant to 18 U.S.C. § 1962(c), which prohibits any
9 person associated with an enterprise engaged in or affecting interstate commerce from
10 conducting or participating in the affairs of the enterprise through a pattern of racketeering
11 activity.

12 170- Defendants including Shein, Registrar, their executives, attorneys Xhu, Chao, Kochsiek,
13 Pietz, and BHFS attorneys, collectively formed an enterprise within the meaning of 18 U.S.C. §
14 1961(4).

15 171- This enterprise extended to and included agents acting under color of law and other
16 unnamed parties working to deprive Plaintiff of her protected rights and property interests.

17 172- The enterprise operated with the shared objective of retaliating against Plaintiff for
18 speaking publicly about fraud, theft, and unethical practices — beginning with Plaintiff’s attempt
19 to expose theft by SpeedX, which led to her being silenced, banned from publishing reviews, and
20 removed from platforms.

21 173- Following her efforts to report and expose this misconduct, Defendants expanded the
22 scope of retaliation by engaging in a pattern of coordinated actions involving:

- 23 • Fraudulent takedowns of Plaintiff’s protest websites as well as her personal business site;
- 24 • Interference with court access and manipulation of judicial assignments;
- 25 • False claims submitted to domain registrars;
- 26 • Coordinated abuse of legal process to discredit, intimidate, and obstruct Plaintiff;
- 27 • Retaliatory referrals, misrepresentation to law enforcement, and procedural sabotage.

28 174- These acts were not isolated. They formed a pattern of racketeering activity under 18
U.S.C. § 1961(1), including but not limited to:

- 1 • Wire fraud (18 U.S.C. § 1343)
- 2 • Mail fraud (18 U.S.C. § 1341)
- 3 • Fraud in connection with domain and service contracts
- 4 • Obstruction of justice (18 U.S.C. § 1503)
- 5 • Retaliation against a witness or complainant (18 U.S.C. § 1513)

6 175- The racketeering activities spanned multiple states and jurisdictions, affecting
7 interstate commerce through the use of online platforms, domain infrastructure, litigation across
8 state lines, and suppression of digital content. Plaintiff traveled repeatedly between Nevada and
9 California as a result of these actions.

10 176- Plaintiff is informed and believes that Defendants knowingly and willfully participated
11 in the conduct of the enterprise's affairs through this ongoing pattern of racketeering activity.

12 177- As a direct and proximate result of Defendants' violations of 18 U.S.C. § 1962(c),
13 Plaintiff suffered injury to her business, property, and person. These injuries include, but are not
14 limited to:

- 15 • Loss of her website and branding infrastructure;
- 16 • Unlawful legal expenses;
- 17 • Reputational harm;
- 18 • Retaliatory medical neglect;
- 19 • Emotional and psychological distress;
- 20 • Economic losses arising from suppression of her career, platform, and rights.

21 178- Pursuant to 18 U.S.C. § 1964(c), Plaintiff seeks treble damages, attorney's fees, and all
22 other relief permitted by law.

23 179- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

24 **EIGHTH CAUSE OF ACTION: CIVIL RICO CONSPIRACY – 18 U.S.C. § 1962(d)**
25 **(Against All Defendants)**

26 180- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
27 fully set forth herein.

28 182- This cause of action is brought pursuant to 18 U.S.C. § 1962(d), which makes it
unlawful for any person to conspire to violate any of the provisions of 18 U.S.C. § 1962(a), (b), or

1 (c) as these violations have been flagrantly committed by Defendants in the present matter with
2 impunity.

3 183- Defendants—including but not limited to Shein, Registrar, Xu, Xhu, Tan-Ho Chao,
4 Blythe Kochsiek, Pietz, attorneys for BHFS, and other Doe defendants—knowingly agreed and
5 conspired with each other and with others to engage in conduct that constitutes a violation of 18
6 U.S.C. § 1962(c).

7 184- The conspirators agreed to participate in a coordinated enterprise to retaliate against,
8 silence, obstruct, and economically injure Plaintiff by:

- 9 • Suppressing evidence of theft and misconduct (e.g., SpeedX and Shein product issues);
- 10 • Banning Plaintiff from posting reviews and complaints online;
- 11 • Falsely removing Plaintiff's website and interfering with domain access;
- 12 • Blocking subpoenas and tampering with legal processes;
- 13 • Undermining judicial neutrality through coordinated influence and retaliation.

14 185- Each Defendant knew of the overall scheme and intended to further it through their
15 individual roles, including as registrars, legal agents, platform administrators, or strategic actors
16 participating in the enterprise.

17 186- The acts performed by one or more members of the conspiracy in furtherance of the
18 RICO enterprise were overt and unlawful. They resulted in damage to Plaintiff's business,
19 reputation, physical health, and access to justice.

20 187- Plaintiff has suffered substantial injury in her business, property, and person as a
21 result of the RICO conspiracy, including loss income, digital infrastructure, reputational damage,
22 medical neglect, mental anguish, economic loss, and deprivation of civil rights.

23 188- Pursuant to 18 U.S.C. § 1964(c), Plaintiff is entitled to treble damages, costs of suit,
24 reasonable attorney's fees, and any other relief the Court deems just and proper.

25 189- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

26 **NINTH CAUSE OF ACTION: VIOLATION OF CIVIL RIGHTS – 42 U.S.C. § 1983**
27 **(Against All Defendants Acting Under Color of State Law, and Private Defendants**
28 **Engaged in Joint Action)**

190- Plaintiff realleges and incorporates by reference all preceding paragraphs as though

1 fully set forth herein.

2 191- This claim is brought pursuant to 42 U.S.C. § 1983, which provides a civil cause of
3 action against persons who, under color of law, deprive another of rights, privileges, or immunities
4 secured by the Constitution and laws of the United States.

5 192- Plaintiff is a private citizen who was exercising her First and Fourteenth Amendment
6 rights to free expression, access to courts, and due process.

7 193- Defendants, including but not limited to attorneys Xhu, Chao, Kochsiek, Pietz, and
8 BHFS attorneys, as well as John Does 1–10 acting as intermediaries with judicial officers or
9 institutions, acted under color of state law when they colluded with the court staff in four separate
10 legal cases.

11 194- Private defendants including Shein, Registrar, BHFS, counsel and associated executives
12 conspired with and willfully participated in joint action with those acting under color of law.

13 195- This includes ignoring subpoenas, retaliating against Plaintiff's protected legal speech,
14 and strategically refusing to cooperate when legally compelled to do so.

15 196- As a direct and proximate result of this conduct, Plaintiff was:

- 16 • Deprived of access to court and equal protection of the laws;
- 17 • Denied the opportunity to have her claims adjudicated by an impartial tribunal;
- 18 • Retaliated against for exercising her rights to speak, publish, and protest online;
- 19 • Subjected to viewpoint discrimination and procedural sabotage in multiple forums.

20 197- Defendants' actions were deliberate, knowing, and malicious, undertaken with intent
21 to deprive Plaintiff of federally protected rights and not subject to ant-SLAPP protection as it
22 involved a criminal conspiracy which is the subject of Plaintiff's complaints to law enforcement
23 officials.

24 198- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

25 **TENTH CAUSE OF ACTION: FRAUD**

26 **(Against All Defendants)**

27 199- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
28 fully set forth herein.

200- At all relevant times, Defendants engaged in a coordinated scheme to deceive

1 Plaintiff, obstruct her lawful activities, suppress her digital speech, and interfere with her legal
2 efforts to expose unlawful or unethical conduct.

3 201- Defendants, individually and collectively, knowingly made false representations and
4 material omissions to Plaintiff and third parties, including:

- 5 • Misrepresenting the source, nature, or basis of complaints used to trigger takedown of
6 Plaintiff's website;
- 7 • Falsely suggesting that Plaintiff's website or content violated law or contractual terms,
8 when no such violations occurred;
- 9 • Intentionally withholding information necessary for Plaintiff to respond or seek redress
10 (e.g., refusing to identify complainants or provide documentation);
- 11 • Pretending to offer good faith engagement while using delay tactics to frustrate Plaintiff's
12 legal efforts;
- 13 • Misleading the courts with false statements regarding Plaintiff's conduct and the legitimacy
14 of Defendants' takedown actions.

15 202- These misrepresentations were made with intent to induce Plaintiff to rely on false
16 legal justifications, abandon her protest website, refrain from filing legal claims, and cease further
17 investigation into the Defendants coordinated misconduct.

18 203- Plaintiff reasonably relied on these falsehoods and concealments.

19 204- Plaintiff took down content under protest, attempted to resolve the matter without
20 litigation, and delayed legal enforcement based on the belief that Defendants would cooperate in
21 good faith — which they never did.

22 205- As a direct and proximate result of Defendants' fraud, Plaintiff suffered:

- 23 • Financial harm due to disruption of business and legal costs;
- 24 • Loss of her protest platform and public voice;
- 25 • Emotional and reputational harm;
- 26 • Ongoing interference with her ability to litigate and pursue accountability.

27 206- Defendants' actions were intentional, malicious, and done with reckless disregard for
28 Plaintiff's rights.

207- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

1 **ELEVENTH CAUSE OF ACTION: TORTIOUS INTERFERENCE WITH CONTRACT**

2 **(Against All Defendants)**

3 208- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
4 fully set forth herein.

5 209- Plaintiff had valid contractual relationships with hosting services, domain registrars,
6 and related business partners for the operation of her website.

7 210- Defendants knowingly interfered with those contracts by making false claims,
8 intimidating service providers, and requesting improper takedowns.

9 211- As a result, Plaintiff's site was removed and her contracts were disrupted.

10 212- Plaintiff suffered loss of access, loss of revenue, and reputational damage.
11 Defendants' interference was intentional and without justification.

12 213- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

13 **TWELFTH CAUSE OF ACTION: TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC
14 ADVANTAGE**

15 **(Against All Defendants)**

16 214- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
17 fully set forth herein.

18 215- Plaintiff had prospective economic relationships with fans, supporters, and future
19 collaborators through her website and online platform.

20 216- Defendants disrupted this expectancy by engaging in a pattern of coordinated
21 suppression and takedown of Plaintiff's content.

22 217- Their interference was wrongful, fraudulent, and carried out with malice.

23 218- Plaintiff lost economic opportunities, fan engagement, and business relationships.

24 219- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

25 **THIRTEENTH CAUSE OF ACTION: NEGLIGENT MISREPRESENTATION**

26 **(Against Registrar and its officers)**

27 220- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
28 fully set forth herein.

221- Defendants misrepresented their internal takedown policies and legal obligations
when Plaintiff inquired about her domain.

1 222- They claimed legal authority or third-party claims that did not exist or were
2 unsubstantiated.

3 223- These misrepresentations were made carelessly and in breach of their professional
4 responsibilities.

5 224- Plaintiff relied on these representations to her detriment.

6 **FOURTEENTH CAUSE OF ACTION: CIVIL CONSPIRACY**
7 **(Against All Defendants)**

8 225- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
9 fully set forth herein.

10 226-b Defendants acted in concert and agreement to silence Plaintiff and interfere with her
11 legal and economic rights.

12 227- Each defendant knowingly participated in wrongful acts carried out by others. The
13 conspiracy resulted in damages to Plaintiff's online presence, business relationships, and
14 constitutional rights.

15 228- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

16 **FIFTEENTH CAUSE OF ACTION: UNJUST ENRICHMENT**
17 **(Against All Defendants)**

18 229- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
19 fully set forth herein.

20 230- Defendants benefitted from suppressing Plaintiff's sites and speech while avoiding
21 public scrutiny, legal exposure, or competition.

22 231- They retained economic and reputational gain at Plaintiff's expense.

23 232- Equity demands that such gains be disgorged.

24 233- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

25 **SIXTEENTH CAUSE OF ACTION: UNAUTHORIZED PRACTICE OF LAW**

26 **Cal. Bus. & Prof. Code §§ 6125–6126**

27 **(Against Pietz Individually)**

28 234- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
fully set forth herein.

1 235- Defendant Pietz is an attorney licensed to practice law in the State of California. At all
2 relevant times, Defendant was not licensed to practice law in the State of Nevada, nor had he
3 received judicial authorization under Nevada Supreme Court Rule 42 (SCR 42) to appear pro hac
4 vice in Plaintiff's Nevada lawsuit, Dinaali v. Shein Distribution Corp., Case No. A-25-915392-C.

5 236- Despite lacking any authority to lawfully appear in Nevada proceedings, Defendant
6 Pietz willfully engaged in the unauthorized practice of law by drafting, signing, and filing pleadings
7 in the Nevada case on behalf of Shein and co-defendants, including a Special Motion to Dismiss
8 under Nevada's Anti-SLAPP law (NRS 41.660), supporting declarations, and responsive opposition
9 briefs.

10 237- Under California Business & Professions Code § 6125, "No person shall practice law in
11 California unless the person is an active member of the State Bar."

12 238- Under § 6126(a), any person who "holds out that the person is entitled to practice law
13 or otherwise practices law" without a valid license may be criminally liable, and such acts also give
14 rise to civil liability, especially when the conduct causes harm to a party, including financial,
15 procedural, or reputational harm.

16 239- Defendant Pietz's unlawful participation in Nevada court proceedings — despite full
17 knowledge of the requirements of SCR 42 — amounts to misrepresentation, fraud on the court,
18 and an abuse of the legal process.

19 240- Because of Defendant's unlawful practice, Plaintiff suffered tangible harm, including:

- 20 • The loss of business website and income;
- 21 • Prejudice in legal proceedings caused by invalid pleadings;
- 22 • Denial of due process in Nevada courts;
- 23 • Delay and confusion in litigation strategy;
- 24 • Emotional and reputational damage;
- 25 • Financial injury resulting from defending against illegitimate filings and threatened
26 attorney's fees.

27 241- Plaintiff was financially and emotional harmed because of Pietz's unlawful act.

28 242- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

 243- In fact, Pietz has as much as admitted to committing this unlawful act.

SEVENTEENTH CAUSE OF ACTION: FRAUD (EXTRINSIC AND EXTRAJUDICIAL)
(Against Walther and Pietz Individually)

1
2
3 244- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
4 fully set forth herein.

5 2245- Defendant Walther, through BHFS, engaged in a deliberate and coordinated effort
6 with other Defendants, namely Pietz, to suppress Plaintiff's protected speech and interfere with
7 her legal and economic rights by targeting her website and domain infrastructure.

8 246- Plaintiff is informed and believes, and thereon alleges, that Walther and Pietz acted in
9 concert with Shein and its legal representatives, and with Registrar's contacts or other platform
10 agents, to coordinate a fraudulent takedown of Plaintiff's websites — which lawfully criticized
11 Shein's conduct and reported issues of public concern.

12 247- Specifically, Walther knowingly or recklessly participated in the submission of false or
13 misleading claims to Registrars that resulted in the removal of Plaintiff's websites, without any
14 legal basis, court order, or notice.

15 248- These representations were made outside of litigation, not in court filings, and were
16 intended to evade judicial scrutiny by suppressing Plaintiff's content extrajudicially, through
17 deception and abuse of internal takedown channels.

18 249- Plaintiff relied on the assumption that a licensed attorney would not engage in
19 fraudulent or coordinated extrajudicial takedown actions.

20 250- Plaintiff attempted to resolve the issue directly and lawfully, but was met with silence,
21 delay, and procedural obstruction.

22 251- Every attempt by Plaintiff to have her websites republished were rebuffed by
23 Defendants.

24 252- As the direct result of actions of Pietz and Walther, who lied under penalty of perjury
25 in a Nevada filing, Plaintiff lost her domain access, suffered financial, reputational and emotional
26 harm, was forced to refile multiple legal actions, and incurred additional litigation costs.

27 253- Plaintiff is informed and believes that Walther and Pietz's actions were part of a
28 broader conspiracy among legal and corporate actors to suppress Plaintiff's voice, shield Shein
from criticism, and deprive her of access to justice.

1 254- Wrongful and unlawful extrajudicial activities are not protected by anti-SLAPP statute.

2 **EIGHTEENTH CAUSE OF ACTION: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
3 **(Against All Defendants Except Where Conduct Was Privileged as Litigation Activity)**

4 255- Plaintiff realleges and incorporates by reference all preceding paragraphs as though
5 fully set forth herein.

6 256- Defendants, including but not limited to Shein, Registrar, SpeedX, and their officers,
7 attorneys Xhu, Chao, Kochsiek, Pietz, BHFS attorneys, and Does 1–10, engaged in a prolonged
8 campaign of coordinated, intentional, and malicious acts designed to suppress, silence, and
9 economically and reputationally destroy Plaintiff.

10 257- This conduct included, but was not limited to:

- 11 • Causing the takedown of Plaintiff's websites and domain without notice or due process;
- 12 • Refusing to disclose the basis of complaints despite repeated requests and lawful
13 subpoenas;
- 14 • Coordinating among multiple entities to obstruct Plaintiff's access to platforms, services,
15 and courts;
- 16 • Targeting Plaintiff during a period of vulnerability as a transgender woman during her
17 artistic transition and after suffering facial trauma;
- 18 • Using internal power and influence to coordinate behind-the-scenes retaliation without
19 lawful justification.

20 258- These acts were not part of any litigation or protected speech, but rather were
21 extrajudicial, commercially motivated, and retaliatory in nature, undertaken without legal
22 authority and outside the scope of protected petitioning activity.

23 259- Defendants' conduct was extreme and outrageous, going beyond all bounds of
24 decency and acceptable behavior in a civilized society. It was intentionally designed to cause
25 Plaintiff emotional trauma, stress, humiliation, and isolation.

26 260- Plaintiff suffered severe financial, emotional distress including anxiety, sleeplessness,
27 physical symptoms of stress, trauma, humiliation, and damage to her mental health, identity, and
28 professional aspirations.

261- As a direct and proximate result of Defendants' conduct, Plaintiff was harmed.

1 compensate for the loss of First Amendment rights and access to lawful channels of protest and
2 commerce.

3 269- Unless enjoined by this Court, Defendants will continue to retaliate against Plaintiff,
4 engage in malicious legal tactics, and attempt to suppress speech through false representations
5 and abuse of legal process.

6 270- Injunctive relief is necessary to:

- 7 • Prevent Defendants from interfering with Plaintiff's business websites or contacting
- 8 registrars or hosts in bad faith;
- 9 • Prevent Defendants from further defamatory and false representations regarding Plaintiff's
- 10 conduct.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff respectfully prays for judgment in her favor and against all
13 Defendants, jointly and severally, and requests that this Court award the following relief:

14 1- General and special damages in an amount to be determined at trial, including damages
15 for personal injury, emotional distress, reputational harm, loss of business expectancy, legal
16 expenses, and disruption to Plaintiff's artistic and digital platforms;

17 2- Treble damages pursuant to 18 U.S.C. § 1964(c) for Defendants' violations of the
18 Racketeer Influenced and Corrupt Organizations Act (RICO);

19 3- Restitution of any funds or benefits unjustly obtained by Defendants, including fees paid
20 to Defendant Registrar, and restitution under California Business & Professions Code § 17203;

21 4- Restitution by Registrar for loss of online income;

22 5- Disgorgement of ill-gotten gains received as a result of Defendants' fraudulent, unfair,
23 and unlawful conduct;

24 6- Injunctive relief prohibiting Defendants, their officers, agents, employees, affiliates, and
25 attorneys from:

- 26 • Engaging in further acts of suppression, obstruction, or takedown of Plaintiff's websites or
27 online platforms;
- 28 • Refusing to respond to subpoenas or interfere with Plaintiff's access to courts and
information; and

- Participating in any future coordinated efforts to disrupt Plaintiff's business, voice, or personal rights;

7- A judicial declaration that Plaintiff's website and domains are lawful and protected under state and federal law and that Defendants' takedown conduct was unlawful and retaliatory;

8- Punitive and exemplary damages in an amount sufficient to punish and deter future misconduct;

9- Pre-judgment and post-judgment interest as allowed by law;

10- Reasonable costs of suit, including filing fees, process server fees, and all other court-related expenses;

11- Attorney's fees to the extent permitted by law, including under RICO, California Business & Professions Code § 17200 et seq., and other applicable statutes;

12- Compensatory and punitive damages for violations of Plaintiff's constitutional rights pursuant to 42 U.S.C. § 1983, including the right to free expression, due process, and equal protection under the law, along with attorney's fees and costs pursuant to 42 U.S.C. § 1988.

13- Any and all other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff DIINELE DINAALI hereby demands trial by jury in this action.

Dated this 1st day of June 2025.

/s/ DIINELE DINAALI

Plaintiff in Pro Per, DIINELE DINAALI

VERIFICATION

I declare under penalty of perjury under laws of State of California that the foregoing is true and that this document was executed in Torrance, California on June 1, 2025.

/s/ DIINELE DINAALI

Plaintiff in Pro Per, DIINELE DINAALI