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In Pro Per

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8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

10

11	JOSE DECASTRO)	Case No.: 23SMCV00538
)	
12	Plaintiff,)	FIRST AMENDED COMPLAINT
	vs.)	(as a matter of course per CCP §472)
13)	
14	KATHERINE PETER;)	CIVIL DEFAMATION, STALKING,
15	DANIEL CLEMENT;)	HARASSMENT, TORTIOUS
16	MICHAEL PIERATTINI;)	INTERFERENCE, RIGHT TO PUBLICITY
17	DAVID OMO JR.;)	
	DOES 1 TO 30, inclusive)	Judge: Hon. H. Jay Ford III
)	
	Defendants.)	Department: O
)	

18 COMES NOW, Plaintiff Jose DeCastro (“Plaintiff” or “I”) hereby brings this first amended
19 complaint against the above-named Defendants and requests a settlement meeting and or conference,
20 and alleges on information and belief as follows:

21 **INTRODUCTION**

22 1. Plaintiff was employed as a constitutional activist and media content creator after
23 studying and teaching constitutional law for over twenty years. Although Plaintiff has been arrested
24 many times while exercising his constitutional rights to protest against racial inequality and the
25

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1 despotism state America has obviously become, Plaintiff has not been convicted of a crime while
2 protesting or otherwise. Plaintiff's only (misdemeanor) criminal records are historically over 20
3 years old.

4 2. Defendant Katherine Peter ("Peter") is a self-described "Internet Troll" that runs an
5 online organization called "Masshole Troll Mafia" that is indeed an illegal criminal enterprise.
6 Trolling is not simply with harmless online pranks. Trolling includes, but is not limited to harassing,
7 stalking, and vandalizing targets. Peter identifies a target, in this case, the Plaintiff is the target and
8 then the criminal activities begin. Peter has done this for years; Plaintiff has vowed to be the last
9 victim of her illegal activities. All Peter need do is identify a target and the nightmare for them
10 happens in an amorphous action of the organization's members, hiding behind internet anonymity as
11 well as state and country borders for protection. Peter coordinates and facilitates the coordination of
12 harassment and stalking of Plaintiff and his relations.

13 3. Peter, herself and through her agents, have conspired together and committed the
14 following crimes and torts on Plaintiff: 1) defamed him by YouTube video and written article, by
15 email, and by telephone calls; 2) defamed his products by YouTube video, Reddit, Facebook,
16 Twitter and by written article, by email, and by telephone calls; 3) interfered with his contracts and
17 prospective economic advantage; 4) stalked him online and in person, harassed him online and in
18 person, trespassed, assaulted, and battered him; 5) used his name, voice, and photograph or likeness
19 for unauthorized commercial use; and 6) committed wholesale copying of his creative content. These
20 tortious acts were committed with malice aforethought as Defendants knew that they would cause
21 him harm and they did cause him economic harm, emotional harm, and physical harm, and will
22 continue to cause him harm in the future. Plaintiff warned Peter for over six months before finally
23 taking legal actions against her and her Troll Mafia.

24 **JURISDICTION AND VENUE**

25 4. General Jurisdiction is proper in this Court because the unlawful practices alleged herein

1 were committed by Defendants within the County of Los Angeles and the harm occurred within that
2 county and the amount of damages sought exceeds the minimum jurisdiction of this Court.

3 5. This Court has general personal jurisdiction because significant parts of the stalking,
4 harassment, assault, and battery occurred in California, primarily in the County of Los Angeles.
5 Defendants' emails and phone calls to California have been substantial, continuous, and systematic.
6 (Code Civ. Proc., § 410.10 and *Perkins v. Benguet Consol. Mining Co.* (1952) 342 U.S. 437 [72
7 S.Ct. 413, 96 L.Ed. 485].) At least one of Peter's agents is believed to be a resident of Los Angeles
8 County.

9 6. This Court has specific personal jurisdiction because alleged source witnesses for Peter
10 and her agents' defamation are allegedly in the County of Los Angeles. Additionally, the alleged
11 judicial record cited from for the defamation, as alleged fact, is a judicial record of the County of
12 Los Angeles. (*Calder v. Jones* (1984) 465 U.S. 783 [104 S.Ct. 1482, 79 L.Ed.2d 804].)

13 7. Venue is Proper in this Court under California Code of Civil Procedure § 395 because
14 Plaintiff is a resident of the County of Los Angeles, and the events or omissions giving rise to these
15 actions occurred in the County of Los Angeles. Additionally, this court offers online filing, which
16 makes it more convenient for foreign parties that are part of this action due to California's long arm
17 statutes.

18 **PARTIES**

19 8. Plaintiff Jose "Chille/Chelito" DeCastro is, and at all times herein mentioned was, an
20 individual residing in Santa Monica, Los Angeles County, California. Plaintiff operates the YouTube
21 channel "Delete Lawz".

22 9. Plaintiff is informed and believes, and on that basis alleges, that Defendant Katherine
23 "Kate" Peter is an individual residing in the State of Massachusetts, County of Bristol. Peter operates
24 the YouTube channel "Troll Mafia Official".

25 10. Peter has said in the past, when harassing and stalking Plaintiff, Plaintiff's family

1 members, Plaintiff's investors, and other associates, that she did not act alone. Rather she conspired
2 with others or through the doctrine of agency did cause this harassment to occur. Peter runs an online
3 organization called "Masshole Troll Mafia" ("Masshole") that is indeed an illegal criminal enterprise
4 that trolls (harasses, stalks, vandalizes, assaults, and batters) targets that Peter identifies. All Peter
5 has to do is identify a target and the "trolling" happens in an amorphous action of the organization's
6 approximately three thousand members, hiding behind internet anonymity as well as state and
7 country borders for protection. Peter coordinates and facilitates the coordination of harassment and
8 stalking of Plaintiff and his relations by her agents.

9 11. Plaintiff is informed and believes, and on that basis alleges, that Defendant Daniel
10 Clement ("Clement") is an individual residing in the State of California, County of Los Angeles.
11 Clement is an agent of Peter.

12 12. Plaintiff is informed and believes, and on that basis alleges, that Defendant Michael
13 Pierattini ("Pierattini") is an individual residing in the State of Washington, County of Pierce.
14 Pierattini is an agent of Peter. Pierattini has hidden behind a false identity for many years, running a
15 troll channel on YouTube named "Blue Bacon", where he harasses people, including Plaintiff,
16 behind a false identity pretending to be a private investigator and military police officer.

17 13. Plaintiff is informed and believes, and on that basis alleges, that Defendant David Omo
18 Jr. ("Omo") is an individual residing in the state of Texas, County of Dallas. Omo is an agent of
19 Peter. Omo has anonymously run a troll channel on YouTube named "Team Skeptic", where he
20 harasses people, including Plaintiff. Omo has a felony conviction for Manslaughter and Plaintiff
21 attacks his credibility under Cal. Evid. Code § 788.

22 14. The true name or capacities, whether individual, corporate, associate, or otherwise of
23 defendants Doe 1 to Doe 30, inclusive, are unknown to Plaintiff, who therefore sues such defendants
24 by such fictitious names, and will amend this complaint to show their true names and capacities
25 when ascertained. Plaintiff is informed and believes and thereon alleges that each of the defendants

1 designated as a Doe is negligently responsible in some manner for the events and happenings herein
2 referred to, and thereby proximately caused injuries and damages to the Plaintiff as herein alleged.

3 **FACTS COMMON TO ALL CAUSES OF ACTION**

4 15. The allegations of this complaint stated on information and belief are likely to have
5 evidentiary support after a reasonable opportunity for further investigation or discovery.

6 16. Plaintiff is informed and believes and thereon alleges that, at all times herein mentioned,
7 Defendants Doe 1 through Doe 30 were agents of each other and of the named defendants and, in
8 doing the things alleged in this complaint, were acting in the scope of such agency and with the
9 permission and consent of Defendant Katherine Peter.

10 17. Peter is the owner, operator, and a user of a group messaging platform on the Discord
11 service (“Discord”). The Discord is used by Masshole members to conspire directed harassment
12 attacks on multiple victims. The harassment includes email, telephone, and public sharing of
13 personal information that can further be used to harass those individuals called “doxing”. Crimes
14 against victims doesn’t stop at harassment, but includes vandalism, stalking, harassment of victim
15 family members and employers, and assault. There are over 2,800 Masshole Members on the
16 Discord account, owned and operated by Peter. Sharing of images, text messaging, and voice chat is
17 available on the Discord. Peter has admitted to tracking Plaintiff on the server “like an endangered
18 great white” on the Discord.

19 **FIRST CAUSE OF ACTION**
20 **FOR LIBEL, SLANDER, AND FALSE LIGHT**
(Plaintiff Against All Defendants)

21 18. Plaintiff incorporates by reference paragraphs 1 through 17, inclusive, as though fully set
22 forth herein.

23 19. Plaintiff, who previously enjoyed a good reputation in the community, was defamed by
24 Defendant’s assertions that he had “Once Sold The Date Rape Drug And Might Be A Snitch, Will
25 Sue us for Mocking him”. A screenshot of the publication containing the defamatory statements is

1 attached to this complaint as **EXHIBIT 1**. Such assertions were published to at least one third party
2 in that YouTube video was viewed 12,716 times as of February 1, 2023. The number of times the
3 title of the video was read is not available until after discovery. Additionally, the video shows up in
4 search results for Chille DeCastro (Plaintiff's well-known nickname), "Jose Maria DeCastro", and
5 "Delete Lawz" (Plaintiff's brand).

6 20. The title of the article constitutes libel per se and statements in the video made by Peter
7 and Pierattini constitute slander per se in that they use inaccurate documents acquired from
8 BeenVerified (in violation of their Terms of Service, partly because of known accuracy issues), a
9 consumer information service, presented as judicial record, to assert as factual that Plaintiff was
10 convicted of a crime that he in fact did not commit. Such statements damaged Plaintiff as a natural
11 consequence of the words, and amount to libel per se and slander per se.

12 21. Such assertions were false because Plaintiff was never convicted of nor did he plead guilty
13 to selling any drug, especially a date rape drug. In fact, in the video, Peter claims that she is unable
14 to get a record from the government. Instead of recognizing that the record doesn't exist, to add to
15 the sting of the story, she asserts that this must mean that Plaintiff is a snitch. Even Peter's record
16 from BeenVerified shows only an arrest, and not a conviction. As an activist, Plaintiff is often
17 arrested, but has not been convicted, and this country's constitution is based on the principle of
18 innocence until proven guilty.

19 22. The arrest record that Peter pulls from BeenVerified shows "POS/PUR F/SALE
20 NARC/C/SUB". To add to the sting of the story in excess of the actual alleged judicial record, Peter
21 alleges having spoken to four witnesses in Los Angeles County that say that the drug involved was
22 GHB. Peter, with even additional malice to add more sting than the actual story, falsely asserts that
23 GHB is primarily used as a date rape drug.

24 23. As a direct and legal result of Peter's publication of false assertions, Plaintiff has suffered
25 the following damages in respect of his property, business, trade profession or occupation: damages

1 in the amount of approximately \$50,000 of compensatory damages and special damages according to
2 proof related to emotional distress.

3 24. Statements were not privileged because they were published to YouTube and not to an
4 internal method between people with a shared interest.

5 25. Plaintiff demanded a retraction within the statutory period and a retraction has still not
6 been published. Instead, Peter said “sue me”. See her video titled “*Still Waiting For My LolSuit*” in
7 Exhibit 3.

8 26. Defendant knew that such statements were false, or acted with reckless disregard as to
9 their truth or falsity, in that she knew that she did not have an official judicial record yet she didn’t
10 even report accurately on the record that she did have from the consumer database.

11 **SECOND CAUSE OF ACTION**
12 **FOR BATTERY**
(Plaintiff Against All Defendants)

13 27. Plaintiff incorporates by reference paragraphs 1 through 26, inclusive, as though fully set
14 forth herein.

15 28. On May 30, 2022, Peter traveled to the Memorial Day Parade in Boston just to confront
16 Plaintiff. In her YouTube video titled “*Chille, I'm So Sorry That I Upset You - Josh Abrams is My*
17 *Knight In Shining Puma!*”, recorded on the same day, she admits to this. Additionally, there are
18 witnesses in the video that describe the existence of video evidence showing that she battered me
19 multiple times. In the video, Peter states “I’m driving across town and checking in with Discord. Is
20 he still there? Is he still there? Because he’s squirrely. I went down there to have a confrontation
21 with him and [he] wasn’t getting away until that happened.”

22 29. At the parade, she did in fact touch me multiple times without my permission, only to
23 annoy, harass, offend, and cause me mental distress. She did in fact annoy, harass, offend, and cause
24 me mental distress. Plaintiff went to the local police dept, Worchester MA, and filed a Police Report.

25 30. On July 22, 2022, while I was at the Tahlequah Court house in Oklahoma and was

1 participating in a press release for a friend, a man that I know only as J.L. Warren, who is a dues
2 paying member of Masshole Troll Mafia, showed up there and purposely ran into me and then tried
3 to have me arrested for Battery. Mr. Warren has written me dozens of emails and hundreds of text
4 messages, harassing me. I've clearly stated to Mr. Warren that I wish no contact with him and that I
5 am not interested in interacting with him. On the same day he purposely ran into me, he called the
6 police on me and tried to press charges against me for Battery. I was temporarily detained by police.
7 It was terrifying because Mr. Warren caused physical contact between us. Thus, I was unaware if I
8 would be arrested or not. Mr. Warren continues to contact me to this day and proudly proclaims, "I
9 am a paying member of Masshole Troll Mafia. You can sue me, Chille."

10 **THIRD CAUSE OF ACTION**
11 **FOR TRESPASS**
(Plaintiff Against All Defendants)

12 31. Plaintiff incorporates by reference paragraphs 1 through 30, inclusive, as though fully set
13 forth herein.

14 32. At several of the places where I have rented property, I have suffered trespass from Peter
15 and her agents, where they entered onto the property without permission and committed harm
16 against the property and myself to terrorize me and in fact did cause significant alarm, fear, and
17 caused damage to the property that required cleanup and repair.

18 33. On August 8, 2022, my van was stolen from my driveway. Masshole members on Discord
19 have taken credit for stealing said vehicle; claiming they stole it!

20 34. On August 19, 2022, in a video where Peter published the findings of Denver Metro PD
21 on my Stolen Van, she published the Address where I was staying in Denver on her Discord. Soon
22 after, Peter and/or an agent left a bag of dog feces and card on the front door. I went to open the
23 storm door, which had a lever type doorknob. When I pushed it down, the lever came off the security
24 door. Under my fingers I felt a gooey brown substance, I immediately dropped the lever. It fell next
25 to the bag of dog feces on my welcome mat. Next, my dog ran up and began licking up the brown

1 gooey substance. I yelled for him to stop. I smelled my hand. It was chocolate. I looked around. The
2 handmade card on the door read, “Kate Always Wins”. See **EXHIBIT 2**.

3 35. On October 25, 2022, while I was staying at a friend’s house, my friend checked the mail
4 and found a threatening letter in his mailbox. The letter stated:

5 Dear Jose DeCastro. I’m requesting you retract any and all lawsuits for a certain
6 individual. If you proceed with the lawsuits I will be forced and will post your current address
7 and location. Sir these little games you play have gone to far and you will be dealt with
8 accordingly. You can run and hide but we can find you anywhere and anytime. It wasn’t hard
9 to locate the address you are currently at so tell Peter G. Hi!

Address: [CORRECT ADDRESS OF MY LOCATION REDACTED]

10 So here are the Terms. Retracts all lawsuits and take down your Youtube channel and
11 find a different profession because you suck as a Constitutional Law Scholar.”

Signed: WE DON’T STOP!!

12 36. While visiting a friend in New Hampshire and Boston in late August, early September
13 2022, Katherine Peter and/or her Masshole members, left a handful of balloons and a large,
14 handmade sign (3’ x 5’) that read, “Kate’s Tea Party” that were left at my friend’s residence,
15 attached to the old-school-mailbox. The location is a 450-acre estate, deep in the countryside of New
16 Hampshire. For someone to get to the location in New Hampshire, driving more than an hour into
17 the countryside is required. Thus, this wasn’t a small endeavor, it took at least one full day to
18 accomplish and likely two people to erect the “gifts” left behind. How Katherine Peter knew my
19 location is beyond incredible and would have required massive surveillance or even a tracking
20 device placed on my auto. During that same trip to visit a friend, Peter stalked and “marked my
21 location” for her “Troll Mafia” to then target me at that location. Brazenly, Peter took a picture of
22 herself sitting outside of the apartment’s lobby where I was temporarily residing. Peter then posted
23 the picture on her “Youtube community Page” that includes over 30,000 Masshole members,
24 marking my location for further attacks. This is the reason DeCastro fled to the New Hampshire
25 estate, only to be stalked and marked by Peter and her Troll Mafia again. DeCastro immediately left
the estate and the East Coast after Peter had “marked” his location yet again.

1 **FOURTH CAUSE OF ACTION**
2 **FOR HARASSMENT AND CIVIL CONSPIRACY**
(Plaintiff Against All Defendants)

3 37. Plaintiff incorporates by reference paragraphs 1 through 35, inclusive, as though fully set
4 forth herein.

5 38. Peter made her first YouTube video harassing me, on April 3, 2022. The video was titled
6 “*BSBT Is Insane, Delete Lawz Grift, Turtleboy Goes Full Auditor*”. The video was over one hour
7 long. The video said that I was running a “grift” and a “scheme”, that I was a “schmuck”, and a
8 “sovcit schmuck from YouTube”. Next, on that video, Peter visits the product store on my website,
9 degrading and disparaging my product offering, including calling a T-shirt I sell, “a Shitty Microsoft
10 word font typed t-shirt”, which is not true. She continued to state, “I’m gonna’ recreate his shit
11 poster and I’m going to sell them for um, \$48 and it’ll be no profit whatsoever. It’ll be exactly what
12 it costs to print on Vistaprint.” Painting me in a Negative light by purporting that, the markup of the
13 products (on my online store) is a scam, grift or con. She goes on to also threaten to copy my
14 products and sell them at cost, just to hurt my business. These are statements that she makes on
15 camera to her 30,000 Troll Mafia Members. As she is fraudulently representing my product lines,
16 several other of Peter’s agents speaking during the video make various defamatory claims about me.

17 39. Although the first video that Peter made was about Plaintiff, who is not a public figure or
18 a limited public figure, the videos soon turned into directly harassing me by being directed **at** me.
19 See the titles of later videos like “*Sorry, Chille. Another One of Your Failures With More To*
20 *Follow*”. Additionally, Peter has recorded these harassing videos even in contempt of court orders in
21 a federal lawsuit. Peter published a video that said among other things “... *because you are a quarter*
22 *of a man,*” in her video “*What To Do If You Get Doxxed – Chille Is A Quarter Of A Man*”, a video
23 that she made after federal court judge Allison D. Burroughs ordered among other things
24 “Defendants are ORDERED not to engage in any threatening, harassing, illegal, or otherwise
25 inappropriate behavior when engaging with each other...”. A motion for contempt against Peter is

1 currently pending in that court. Peter has made 70 videos totaling over 170 hours of content about
2 Plaintiff (See **EXHIBIT 3**). These videos did seriously alarm and annoy me and did cause me
3 substantial emotional distress and financial loss.

4 40. On May 3, 2022, Peter and her agents called my phone approximately 100 times while I
5 was recording a video that I was broadcasting live to my audience, just to troll me. I was doing a live
6 fundraiser for a Native American woman that had been illegally arrested on her tribal lands and I
7 was trying to call her when the telephone harassment began. Peter and her agents were watching my
8 livestream and determined when it would be best to harass me, for example, when I needed to use
9 my phone, they called the phone approximately 100 times. You can see this in my video titled
10 *“Deborah’s Story – Fake Law vs Real Law – Ironton Bad Practices Fundraiser for \$Deborah”*
11 at timestamp 14:58 – 24:36. Even after I put my phone in do-not-disturb mode, the harassing texts
12 were continuously coming in and audibly disturbing my phone call with my video guest for the
13 fundraiser. The repeated telephone calls and text messages impacted the fundraising and seriously
14 annoyed and harassed my guest and me. The video is available on YouTube at the following URL.
15 After I was off air, I had approximately 100 missed calls. I tried calling one of the numbers back and
16 it was a Google Voice number that Katherine Peter had set up with a voicemail message in her voice
17 that said, “I told you to never threaten me, Chille.” At the sound of the beep, I left a message and
18 asked her to stop contacting me.

19 <https://www.youtube.com/watch?v=8Yed5EwVITw>

20 41. Peter also hired a man that I know only as Todd Lyon that attempted to befriend and then
21 betray me. Todd and I talked several times by email, text, telephone, and even video chat.
22 Eventually, Mr. Lyon admitted that he had been paid \$1,000 to attempt “to get close to me and then
23 sabotage me”. Mr. Lyon has prepared affidavits attesting to these facts.

24 42. Peter and her agents have repeatedly emailed, cyberstalked, stalked, harassed, and
25 trespassed on my residence. Additionally, they commit wholesale copyright infringement of my

1 creative content in order to harass me. I have a pending federal lawsuit over the wholesale copyright
2 infringement. These people have even harassed my dog, Charlie. Defendants further refuse to honor
3 any harassment cease requests or cease demands. There are additional events that discovery will
4 reveal, and proof provided at trial.

5 43. The Masshole members work together to harass me for clout in the organization and
6 constitutes clear conspiracy. The defendants work together in an agreement to commit these
7 wrongful acts.

8 **FIFTH CAUSE OF ACTION**
9 **FOR STALKING, CYBERSTALKING, AND CIVIL CONSPIRACY**
(Plaintiff Against All Defendants)

10 44. Plaintiff incorporates by reference paragraphs 1 through 43, inclusive, as though fully set
11 forth herein.

12 45. Although the Discord was originally created in October of 2019, it gained more users
13 when Peter advertised it on her YouTube channel on May 25, 2022. She specifically advertised that
14 on the Discord they would establish a “Chille-Watch” page. This was to both stream my Copyright
15 Videos, “so that Chille won’t get the YouTube views” and to “Track him like an endangered Great
16 White” shark.

17 46. Peter has also used Wickr group chat in order to track and coordinate harassment and
18 stalking of me.

19 47. Further, Masshole members have written in the Discord account and directly contacted me
20 via email that they have planted an Apple AirTag (a commercial tracking device) in / on my vehicle.
21 Which made sense to me because they have consistently found my exact location, even today as I
22 write this complaint.

23 48. Peter and several of her Masshole members have written and stated aloud on Peter’s
24 videos that they are actively tracking me like an “endangered great white [shark]” or “extinct
25 megalodon”. As of February 3, 2023, while live-streaming a video titled, “*The Camera is what*

1 *makes YOU Powerful*” a Masshole member posted my exact location in the “Live Chat”. The
2 Masshole member went as far as to create a fake username in the true name of the friend’s house that
3 I was at. I ended the live stream to ensure my location was safe. I informed my friend that someone
4 has created his exact name as a “YouTube username” and he immediately stated his concern for his
5 safety, and mine. He did not ask me to leave, which has happened to me in the past when being
6 stalked by Peter and her Troll Mafia. Nobody feels comfortable when a “Troll Mafia” publicly doxes
7 your exact location. It causes immediate concern for safety. Peter cannot fully control the 30,000+
8 Masshole Troll Mafia members actions and she’s stated this clearly, several times in the past, but she
9 has given them authority to act to harass me. Obvious, malicious intentions exist to cause me and my
10 loved one’s fear and panic, which does in fact cause the fear and panic.

11 49. I have been stalked and harassed at my residences in New Hampshire, Boston, New
12 Mexico, Colorado, Nevada and California. I have suffered from vandalism. My van was stolen,
13 likely by Peter and/or her agents. Masshole Troll Mafia members on Discord have taken credit for
14 the stealing of my van, stating that “It’s under water and it will never be found”.

15 50. In the Discord there is a page called “chille-watch” where my location has been constantly
16 and consistently tracked and Peter and her Masshole agents have used this information to cause
17 damage, intimidate and instill fear into me, but more importantly, to the people around me! I’ve
18 been stalked since June of 2022, non-stop, and it’s still going on today, right now.

19 51. It does not matter what I’m doing, where I’m going or who I am with. If I am
20 livestreaming while filling my car up with gas, people from Katherine Peter’s “Troll Mafia” will
21 start calling the gas station attendant at that gas station. It’s real and this entire scenario is on video
22 that will be available at trial. The hosts of accommodations, where I stay when I am traveling the
23 country, are contacted by telephone, email, and messages through Airbnb. Masshole members will
24 then “warn” the people who are providing my Airbnb, “Did you know that DeCastro is a dangerous
25 man who carries guns and is wanted by the police in multiple states?”, which isn’t true.

1 52. On July 29, 2022, I was attending an MMA gym in Denver Colorado. A Charity-Event-
2 Fight Promoter, I, and a former Police Officer were putting together a charity event, wherein all the
3 profits (including the Officers pay and mine) would be donated to St. Jude’s Children Hospital. We
4 had sold almost 1000 tickets (\$40 each) for the event, that I took seriously. Thus, I temporarily
5 moved to Denver to join my good friend’s MMA training center called, “Tenth Planet Jiujitsu”. On
6 this day, July 29, 2022, the owner of the gym, my 20 year long friend, sent me a text message,
7 issuing me a refund and simply stating, “I’m sorry Chille. I can’t get the google ratings down like
8 this. I’m being harassed like you don’t even understand! I just can’t. I’m sorry!” The Harassment of
9 said gym owner continued for several months, even after I left.

10 53. Approximately August 1, 2022. After being a member of Airbnb since 2010, I was
11 unceremoniously and immediately kicked out of my Airbnb in Denver, Colorado. Airbnb would not
12 reveal the reasons why. I’ve rented hundreds of locations from Airbnb since 2010. As an Ad
13 Executive in NYC, it’s imperative to have the ability to be able to rent Airbnb’s quickly. On this
14 date, Airbnb suspended my account indefinitely. “You’ve been assessed to be a risk factor. You are
15 to immediately pack your belongings and leave the Airbnb, the host has canceled your month long
16 reservation (this on Day 2 of the 30 day stay). Please standby for a phone call from the Airbnb safety
17 and security team”. On that phone call I was told that Airbnb had been alerted that I am armed and
18 dangerous, “Are you carrying a gun? Is there a gun in the Airbnb”. Of course not. However, a man
19 named Sean O’Dea who goes by the name “Irish Demon” on Youtube and is also a dues Paying
20 Member of Masshole, previously had posted on his linked-in Page that he worked as “Customer
21 Service” for Airbnb for over six years. It is Plaintiff’s intention to subpoena Airbnb to find out
22 exactly what happened on August 1, 2022. Mr. DeCastro has never been asked to leave any rental
23 property from Airbnb and has maintained a perfect 5-star rating on the application since 2010. After
24 threatening a lawsuit, Airbnb restored “Permissions” to use my account in December of 2022 but I
25 haven’t seen the documents yet that caused the suspension.

1 54. On August 10, 2022, Peter made a YouTube video falsely reporting that my van was
2 repossessed, simply to further harm my reputation and to further harass me. This, even after she had
3 attained the Denver Police Dept. report that my Van was indeed stolen. Denver Police would later
4 arrest and charge a woman for stealing my Van. Peter has made no retraction or corrected her
5 erroneous reporting.

6 55. On October 6, 2022, while me and my roommate were walking home from the market in
7 Santa Monica, California, while maybe 50 yards from my permanent residence, a man pulled up to
8 us in a vehicle with Florida license plates and yelled “I see you, Chille! I know where you live! Kate
9 always wins!”, and then quickly drove away. This caused great alarm and fear in my roommate and
10 myself. We went through weeks of infighting because my roommate feared for his autistic son’s
11 safety. It’s beyond reasonable for Masshole Troll Mafia Members to show up at my house and
12 threaten me, my roommate, and my safety.

13 56. My mother, immediate and extended family members, as well as dozens of my, small-
14 town-friends (in Alaska) have received many harassing phone calls. I graduated with 62 young men
15 in 1992, most of them have been contacted by Masshole Troll Mafia Members. My roommate,
16 David Condon, has received harassment, trespass, and vandalism. Previous investors, colleagues and
17 co-workers have received both calls questioning who I am and also warning that I have become a
18 danger to them and they should stay away from me, “if they know what’s good for them”. One of
19 Peter’s agents, that I know as David Omo has been continuously emailing me, often multiple emails
20 a day. Omo’s email content has escalated to warnings of violence and then to actual threats of
21 violence, including references to his felony criminal record to make them more credible. Pierattini
22 has been sending me harassing emails, forged to look like they’re from a court, two to three times a
23 day since at least November 2022.

24 57. I have had dog poop left on my porch, my outside door handle covered in what looks like
25 poop, and my external door handle removed. I have received gifts of balloons and cards about

1 “Kate’s Tea Party” left at my residence. Peter has posted pictures of herself on her YouTube page in
2 front of one of my temporary residences. Peter has paid a man one-thousand dollars to “Try to get
3 close to me and sabotage me”. I have the receipts and the man’s affidavit, stating these facts.

4 58. As a result of the foregoing, I have legitimately feared for the safety of myself, my family
5 members, and my associates and am constantly in a state of alarm. The Masshole Troll Mafia
6 members work together to stalk me for clout in the organization and this constitutes clear conspiracy.
7 The defendants work together in an agreement to commit these wrongful, illegal acts.

8 59. There are additional events that discovery will reveal and proof will be provided at trial. In
9 this scope, but not limited to it, Katherine Peter will stalk, harass and assault any person who
10 Plaintiff DeCastro recognizes or associates with. From August 27th until September 11, 2022,
11 Katherine Peter tracked, stalked and harassed Zane Kane, the man whose residence DeCastro had
12 stayed at in New Hampshire and Boston. When they could not affect Mr. Kane, Troll Mafia
13 Members then found the owners of the property where Mr. Kane was residing. Troll Mafia Members
14 warned the Land Owners (A Harvard Professor and her husband a Venture Capitalist) that Mr.
15 Kane’s friend, DeCastro, was armed, dangerous and wanted by the FBI; all lies. Plaintiff DeCastro
16 had already left the East Coast and was not there to defend these lies. Mr. Kane was fired from his
17 job and lost both of his residences as a result of the stalking. Peter would go on to make several
18 videos about Mr. Kane, who had no relationship with her and had never even met her.
19 Approximately, Jan 27, 2022, Plaintiff DeCastro publicly recognized a YouTuber named Regan
20 Benson. Three days later, on Jan 30, 2022, Defendant Peter made a video about Regan Benson titled,
21 “*The Reagan Benson and Denver Metro Audits Mystery*”. This is an attempt to alienate and disrupt
22 the First Amendment Auditor Community that DeCastro is a part of. Regan Benson had never
23 previously been mentioned or referred to by Kathereine Peter.

1 **SIXTH CAUSE OF ACTION**
2 **FOR ASSAULT**
(Plaintiff Against All Defendants)

3 60. Plaintiff incorporates by reference paragraphs 1 through 59, inclusive, as though fully set
4 forth herein.

5 61. On October 14, a member of Masshole Troll Mafia, who I know only as Dan Clement
6 began plotting to get into a physical altercation with me in order to, at his own admission, cause me
7 to lose possession of my firearm.

8 62. Clement had been in a fight in his past where he had a restraining order placed on him,
9 and so he was aware of the repercussions of them. He wanted to use this tactic to cause me to lose
10 my firearm.

11 63. On October 17, armed with bear spray, and a tape measure (to measure my height),
12 Clement used the group's Discord chille-watch page to receive coordinates, plan, and get real time
13 logistics of my location from several other Masshole Troll Mafia members, who were tracking my
14 location in real time.

15 64. Clement quickly found me while I was working as a reporter for my YouTube Channel
16 and engaged with officers of the Los Angeles Police Dept. While busy working, Clement, with the
17 help of the Discord "chille-watch" tracking page created by Peter, Clement approached me and said
18 "Kate always wins." Then he repeated it. "Kate Always Wins, Chille!" I addressed Clement, then I
19 asked him to leave me alone and I walked the other way. Every action I'm describing here is on
20 video, for this court to review.

21 65. Clement followed me and said that he could beat me up, "I could hold you down and then
22 ground and pound you! Look how little you are!" he exclaimed. Again, I walked away, went the
23 other way and quickly down the block to avoid having to protect myself from this stalker.

24 66. While down the block, moments later, Clement approached me again and somehow
25 managed to corner me. After trying to go left, Clement blocked me. I tried to go right; Clement

1 blocked my path. I took a fighting stance ready to defend myself and announced to Clement that I
2 would now begin an offensive-defense. Now that I was visibly angry and ready to defend myself,
3 Clement ran away, quite literally crying, “Please, don’t hurt me! Please, don’t beat me up! I’m
4 sorry!” Clement was then assisted by people who plaintiff could only believe were members of
5 Katherine Peter’s, Troll Mafia Club, who came to Clement’s assistance. Clement would then appear
6 on Peter’s Discord and claim victory for “Trolling” me. Remember, Clement brought with him Bear
7 Spray, Rope and a measuring tape, which would cause any reasonable person to fear for their safety.

8 67. I did believe that I was going to be attacked by Clement. Clement did in fact threaten me
9 both verbally and was using physically menacing body maneuvering. I believed that he was going to
10 carry out a physical attack onto me. Clement did in fact stalk me, menace me, and cause me ongoing
11 mental distress, fear, and alarm. Clement continues to contact me to this day.

12 **SEVENTH CAUSE OF ACTION**
13 **FOR ECONOMIC INTERERENCE**
 (Plaintiff Against All Defendants)

14 68. Plaintiff incorporates by reference paragraphs 1 through 67, inclusive, as though fully set
15 forth herein.

16 69. On May 2, 2022, Peter contacted David Condon (“Condon”), an accredited investor who
17 had previously invested in my company. Condon has invested approximately \$100,000 into my
18 ventures through the years and he and I had formed a close friendship. Condon told me that Peter
19 wanted to “Interview him about my previous tech venture”. Condon agreed and on May 3, 2022 the
20 two talked at length on the phone. During the conversation, Peter did her best to paint me in a
21 negative light. Condon has prepared an affidavit and will testify at trial.

22 70. On July 6, 2022, Peter called David Condon (“Condon”) dozens and dozens of times and
23 sent him approximately a hundred text messages. Mr. Condon is an accredited investor and a 65-
24 year-old man. The messages and people on the phone only said one thing, and the text messages said
25 the same thing. That message was, “Kate Always Wins”.

1 71. Peter knew of the agreement between Condon and I. Peter intended to cause breach of
2 contract and did in fact harm the business relationship. Although Condon has prepared an affidavit,
3 Peter's conduct was a substantial factor in Condon not investing any further in my projects.

4 **EIGHTH CAUSE OF ACTION**
5 **FOR RIGHT TO PUBLICITY TORTS**
6 (Plaintiff Against All Defendants)

7 72. Plaintiff incorporates by reference paragraphs 1 through 71, inclusive, as though fully set
8 forth herein.

9 73. Defendants have used my likeness to advertise most of their YouTube videos about me.

10 74. The Defendants gained a commercial benefit because their following, as well as my
11 following, were looking for content about me and used the images to find the content, which earned
12 advertising revenue for the Defendants.

13 75. I was harmed by not having that ad revenue myself, by the videos containing negative
14 content about me, and because as a trained actor, I charge fees and have been paid for my likeness.

15 76. As a direct result, I suffered financial loss, momentum to grow my brand, humiliation,
16 embarrassment, mental distress, and economic harm.

17 **PRAYER FOR RELIEF**

18 Plaintiff prays for judgement against Defendants, and each of them, as follows:

19 1. Enter an injunction for any and all appropriate injunctive relief, including but not limited to,
20 issuing a retraction in substantially as conspicuous a manner as the original defamatory statements
21 were published and broadcast, and removing the defamatory information from all places where it is
22 currently published online;

23 2. A declaration that the defamatory statements were untrue;

24 3. An injunction prohibiting Defendant from repeating such defamatory statements;

25 4. Declare, adjudge, and decree Defendants violated the relevant provisions of California Civil
Code;

1 5. Order Defendants to pay \$750 to Plaintiff for his right to publicity violation in pursuant to
2 Civil Code § 3344(a);

3 6. Order Defendants to pay \$500 to license my likeness for each use, customary to my sitting
4 rate;

5 7. Order Defendants to Pay revenue earned for unlicensed use of my likeness, according to
6 proof;

7 8. Order Defendants to pay \$50,000 for damages in lost income for defamation;

8 9. Order Defendants to pay \$100,000 to Plaintiff for damages for her interference with
9 economic relations;

10 10. Order Defendants to pay \$250,000 for special future damages from the defamation;

11 11. Order Defendants to pay any additional special and general damages according to proof;

12 12. Award exemplary damages and \$86,000 in punitive damages pursuant to the requirements
13 of Civil Code Section 3294;

14 13. Award Plaintiff attorney's fees and costs of suit;

15 14. Order Defendants to pay interest at the legal rate on such damages as appropriate,
16 including pre- and post-judgement interest; and

17 15. Grant any further relief that this Court deems just and proper.

18
19 DATED: March 14, 2023


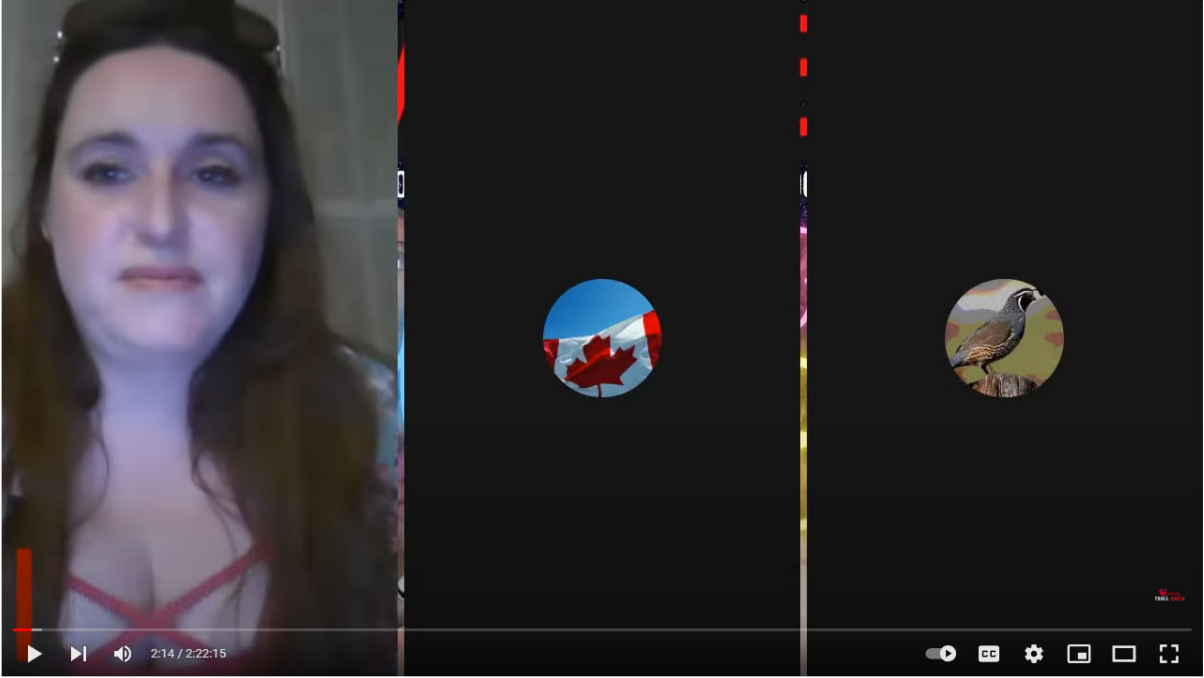
20 
21 _____
22 José DeCastro
23 In Pro Per
24
25


EXHIBIT 1

← → ↻ youtube.com/watch?v=85YEdqvbqX4

☰ YouTube 🔍 🔊



Chille DeCastro Once Sold The Date Rape Drug And Might Be A Snitch, Will Sue us for Mocking Him

 **Troll Mafia Official**
26.6K subscribers [See perks](#) [Subscribed](#)

12,716 views Streamed live on May 22, 2022
LIKE, SHARE & SUBSCRIBE!

EXHIBIT 2



EXHIBIT 3

Title	Length (H:M:S)	Views as of 2/1/2023
BSBT Is Insane, Delete Lawz Grift, Turtleboy Goes Full Auditard	1:05:22	6,557
Victim of Delete Lawz Speaks, Weaponized MAGA Karen Vs. Twitter	2:12:49	14,726
Delete Lawz Is Threatening Me Via Bizarrely-Worded Psychotic Messages Sent Through Josh Abrams	54:25	13,561
Reading Off Court Records From The Criminal Record Delete Lawz "Chille" Decastro "Doesn't Have"	1:29:43	26,118
Larry Flenoid Talks Chille DeCastro, BLM, Unity And The Mechanisms For Change	1:53:40	9,481
A History of Chile's Scams: Is David Condon A Victim Or Accomplice?	2:01:32	10,547
Chille Is Unfit For Office Pt 1; Virgo Lie-ad Returns With More Lies	1:52:16	8,993
Desperate Connections: Chille DeCastro Needs A Girlfriend!	0:48	3,261
Chillism #1 How To Control Your Temper	1:35	4,659
Chille DeCastro Wants To Rip Off A Childhood Cancer Charity, Very Cool!	1:04:57	9,153
Chillism #2 Government Butt Stuff	2:18	4,376
Chille DeCastro Once Sold The Date Rape Drug And Might Be A Snitch, Will Sue us for Mocking Him	2:22:15	12,716
Good Googly Moogly People, Chille & "Bobby Law" Are Definitely Trying To Scam You	58:15	9,404
#socialjusticewarrior #seriousjournalisms Chille DeCastro Is Very Sensitive To Victims!	0:18	3,117
Still Waiting For My LolSuit	2:01:46	6,775
Sweet Chille Pepper 🌶️	1:25:40	6,820
Chille, I'm So Sorry That I Upset You - Josh Abrams is My Knight In Shining Puma!	1:40:34	16,929
My CAMERA Scares Chille So Much, He ASSAULTS Me And Knocks It Out Of MY Hand!	0:57	13,448
Delete Lawz The America Hero: A Memorial Day Tale Of Bravery	1:28	7,028
I Am Fundraising To Fly Out To Support Christy Rohn And Sarah Paige	57:07	6,256
Chille DeCastro's Hypocrisy And Tyranny Are Almost As Prominent As His Cowardice	40:14	10,019
Crazy Day In Court - Chille Takes Yet Another L	3:48:25	44,472
Delete Lawz Full Court Audio - Failed Attempt At Ex Parte Protective Order	1:20:37	33,864
The Frog Releases Delete Lawz Unauthorized Recording Of Hearing, Chille Has A New Scam	1:50:08	17,680
Weeknight Show - Gun laws and debate. Did Chille legally acquire his gun? Is he legally carrying it?	2:08:56	8,030
Restreaming Chille's "Expose" On James Freeman	3:06:39	20,260
How To Do Court - Feat. @Delete Lawz	0:39	9,039
You'll NEVER Guess Who's Speaking Out Against @Delete Lawz Now! IMPROMPTU LIVE EXPOSE!	1:46:03	16,703
Reacting To And Debunking Chille's Devastating Expose With Actual Evidence And Receipts	2:11:17	18,912
Delete Lawz Uploads Lie-Filled Stream, Denies Everything, Dirty Deletes	1:48:59	19,767

Shortly Afterward		
UPDATE! Chille DeCastro Is Scamming Off Christy Rohn!!	1:35:07	15,350
Chille Decastro's Crazy Lies, Christy Rohn Is Actually Not A Nice Person	2:44:24	15,193
The End Of A Channel, Or The End of Era? It's Over, Time To Self Delete.	1:25:48	16,687
Title: R.I.P To All The Ops 🙏 😞	1:45	4,504
Chille DeCastro Gets Racist And Agressive Again	2:03:33	11,924
Chille's Biggest Failure Yet	2:47:19	18,710
Live Dive Into Scammer Chille DeCastro's Plagiarized "Transparency App" Idea	56:24	10,554
Delete Lawz Tries To Get Denver Metro Audits Arrested	1:20:14	11,111
Chille Has Sent Denver Metro Audits The Most Ridiculous Cease And Desist Ever. Let's Read It Live	1:10:39	14,381
Live Dive Into "Bobby Law" Delete Lawz Scamming Fake Lawyer	1:48:54	14,754
The Rise And Fall of Auditing America, Bobby Law Rabbit Hole Gets Deep	1:14:05	10,871
Lauren Is Allowed To Insult And Degrade Me But Not Allowed To Restream.	1:51:33	16,058
Chille DeCastro B*tches Down From The Fight, Turtleboy Fakes Evidence Rather Frequently	2:06:58	16,353
"You'll Never Get My Dog To Swim"	0:23	3,287
D*mnit, Deborah, You Listened To Chille And Now You're In Jail	1:08:06	17,341
The Court Is A Narcissistic Abuser's Stage; That's Why Chille And Turtleboy Love To Perform There.	2:00:32	11,213
Chille Threatens An Elderly Man, Disrespects His Mother; Returns To New England	1:50:38	12,924
Help! Chille's Very Serious Federal Lawsuit, I'm Going To Prison, And Deborah Is Dehydrated!	1:41:17	13,167
LIVE UPDATE! CHILLE'S CLIMB TO #1 GRIFTER OF THE YEAR	1:04:09	11,795
Love Letters From Chille (NSFW, But Totally Hetero, You Guys)	3:51	7,041
Delete Lawz Followed Through With A LolSuit, And It Is Hilariously Flawed	1:16:08	14,758
Responding To Chilles Meltdown And Threats	2:39:36	17,700
Chille's Stolen Van Report - My Prediction Came True	2:42:24	16,871
Chille Wishes Cancer On Children, Defames Me Again, Loves The Idea of Prior Restraint	2:03:06	19,271
Threatening People Two Days Before Court Is Dumb.	1:34:04	14,623
Sorry, Chille. Another One Of Your Failures With More To Follow	2:45:58	26,168
Chille Laments His Battle Loss, Vows A War As His Greatest Ally Keeps Running His Mouth	1:20:29	15,308
Court Went _____, And It's All Part of Chille's Master Plan	1:57:33	18,059
Live Dive: Zane Kane, Keffals V. The Internet At Large	1:56:11	11,726
Chille DeCastro; Blackmail, Lies, Death Threats And Traffic Tickets	3:15:21	24,877
Has Chille Ever Blackmailed Anyone Before? The Court Docs He Doesn't Want To Get Out!!	55:44	15,623
MEMBERS ONLY- Our Last Stream Ever Before Chille Takes The Channel Down	1:53:44	Not Public Info
MEMBERS ONLY: Turtleboy Helps Chille W/ Harassment, Spreads Rumors, Freaks Out And Lies About It	3:00:21	Not Public Info

MEMBERS ONLY STREAM - LOLCow Update - Laguna Lauren, Delete Lawz, Cyraxx, Charlie Z?	1:25:25	Not Public Info
Chille Is Sending Me Psychotic Emails, Attacking My Attorney, Threatening Me	1:06:51	15,112
Live War Room Briefing	1:25:50	10,873
We Do Not Bow To Bullies. We Do Not Break.	56:41	11,395
Let's Celebrate! Ask Me Anything!	3:22:32	13,154
What To Do If You Get Doxxed - Chille Is A Quarter Of A Man	1:07:53	11,804
Chille Decastro Films His Own Arrest For Criminal Threats, Cyraxx and Chille Plot On Facebook Live	1:26:36	14,814