

IN THE IOWA DISTRICT COURT FOR SCOTT COUNTY

**RYAN KOPF,**

*Plaintiff,*

VS.

**TRAE DORN, A/K/A ERIC T. DORN,  
CHRISTOPHER STURZ, AND NERD  
& TIE,**

*Defendants.*

CASE No. CVCV295431

**AMENDED PETITION AT LAW  
and JURY DEMAND**

COMES NOW the Plaintiff, RYAN KOPF, by and through his attorneys, Puryear Law P.C., and hereby brings this action against the Defendants, Trae Dorn, a/k/a Eric T. Dorn ("Trae Dorn"), Christopher Sturz, and Nerd & Tie. In support of his Petition at Law, the Plaintiff respectfully states and alleges as follows:

**BACKGROUND**

1. Plaintiff, RYAN KOPF, is a resident of Scott County, Iowa.
2. Plaintiff owns a business called Chrono L.C., which has its principal place of business in Scott County, Iowa.
3. Plaintiff, through Chrono L.C., organizes conventions for anime fans throughout the Midwest, including Anime-ZAP!, QC Anime-zing!, AniMinneapolis, Anime Midwest, Meta Con, and Con Alt Delete.
4. Defendant, Nerd & Tie, is a podcast and news website that covers various anime topics.
5. Defendant, Trae Dorn, is a resident of Indiana.
6. Defendant, Trae Dorn, is the creator and producer of Nerd & Tie and writes and posts numerous blogs on Defendant Nerd & Tie's website.

7. Defendant, Trae Dorn, co-founded No Brand Con, a long-running anime convention in Wisconsin.
8. Defendant, Nerd & Tie, is starting a new anime convention in Wisconsin on September 23-25, 2016, the Nerd & Tie Expo.
9. Defendant, Christopher Sturz, is a resident of Wisconsin.
10. Defendant, Christopher Sturz, is a co-owner of Nerd & Tie and posts many blogs on Defendant Nerd & Tie's website.
11. Defendant, Christopher Sturz, also has a personal facebook page.

#### **FACTS**

12. On or about August 18, 2014, Defendant, Trae Dorn, wrote and posted a blog entitled, "Do some of Ryan Kopf's Conventions Break the Law? Quite Possibly" on Defendant Nerd & Tie's website. In the blog, Defendant Trae Dorn, states that "Ryan Kopf has been running Iowa based Chrono LC events . . . for years" and refers to Chrono LC as "an Iowa LLC."
13. On or about August 6, 2015, Defendant, Trae Dorn, wrote and posted a blog entitled, "Ryan Kopf's Anime California Harasses, Threatens Maid Cafe Operators After They Refuse to Sign Over Ownership," on Defendant Nerd & Tie's website.
14. In the blog, Defendant, Trae Dorn, states that Plaintiff is "the poster child for unethical con running."
15. Defendant, Trae Dorn, states in the blog that "Ryan Kopf's Anime California tried to strong arm the Maid Cafe group . . . into signing over ownership, and when they refused to, Anime California began a campaign of harassment that boggles the mind."

16. Defendant, Trae Dorn, in the blog states as follows: “The constant legal threats and ongoing harassment are a ridiculous overreaction when looked at in the best light, and a dangerous, malicious attack when looked at with a more realistic lens. These actions are anti-community, and part of the continuing poison those associated with [Plaintiff’s business] Chrono LC seems determined to bleed into the con scene. Or, in other words, business as usual for Mr. Kopf.”
17. On or about September 8, 2015, Defendant, Trae Dorn, wrote and posted a blog entitled, “Animecon.org CEO Ryan Kopf Allegedly Attacks Vendor During Metacon 2015,” on Defendant Nerd & Tie’s website.
18. In the blog, Defendant, Trae Dorn, accuses Plaintiff of physically assaulting a vendor, David Silvieus of Plush in the USA, at an anime convention, Metacon, that Plaintiff and his business was running on September 5, 2015, in Minneapolis, Minnesota.
19. Defendant, Trae Dorn, in the blog states that Plaintiff had punched the vendor several times after the vendor was told to leave the convention for selling bootleg items at his booth, the vendor refused to leave, and Plaintiff and his staff blocked attendees from approaching the vendor’s booth.
20. Defendant, Trae Dorn, in the blog states several times that Plaintiff’s “physical overreaction” in striking the vendor was “inexcusable.”
21. Defendant, Trae Dorn, in the blog states that it is “impossible” not to question the safety of attendees at Plaintiff’s shows “if the organizer himself is physically attacking other people at events.”
22. Defendant, Trae Dorn, in the blog states that Plaintiff has an “iffy professional

reputation.”

23. Defendant, Trae Dorn, in the blog states that Plaintiff is “a sketchy con runner.”
24. Defendant, Trae Dorn, in the blog states several times that the Plaintiff is a “villain.”
25. Many user comments were posted in response to both of these blogs.
26. In addition, the blog posts have been reposted on the Tumblr, Disqus, File770, Facebook, Twitter, and WebMii websites.
27. On or about January 5, 2016, Defendant, Trae Dorn, set up a “Ryan Kopf is Suing Me” GoFundMe account to solicit donations for his legal defense. Information about the fund was also posted by Defendant, Trae Dorn, on Defendant Nerd & Tie's website. On the GoFundMe page, Defendant, Trae Dorn, states that any remaining funds not used for legal defense costs will go toward the Nerd & Tie Expo Funds, an anime convention that is in direct competition with Plaintiff's anime conventions.
28. On or about January 6, 2016, Defendant, Christopher Sturz, posted a link to the “Ryan Kopf is Suing Me” Fund on his facebook account and stated, “Donate. Because somewhere is a young woman who was harassed and intimidated into not pressing charges after she was sexually assaulted and we need to show Ryan Kopf that ENOUGH IS ENOUGH.”
29. On or about January 6, 2016, Defendant, Christopher Sturz, posted on his facebook account that Plaintiff is “a rapist.”

#### **COUNT I- DEFAMATION PER SE**

30. Plaintiff re-alleges and reasserts the allegations and information contained in paragraphs 1 through 29 of this Petition at Law as if fully developed herein.

31. Defendant, Trae Dorn, published statements on Defendant Nerd & Tie's website on or about August 6, 2015, and September 8, 2015, which falsely represented that the Plaintiff had physically assaulted a vendor at a convention he was running, that his business had harassed another business, and that impinged on his integrity, moral character, and professional reputation.
32. Defendant, Christopher Sturz, published statements on his facebook page on or about January 6, 2016, which falsely represented that the Plaintiff was a rapist.
33. All of these statements constitute defamation *per se*, as they accused the Plaintiff and/or his business of committing indictable crimes and was an attack on Plaintiff's integrity, moral character, and professional reputation.

**COUNT II- DEFAMATION PER QUOD**

34. Plaintiff re-alleges and reasserts the allegations and information contained in paragraphs 1 through 29 of this Petition at Law as if fully developed herein.
35. Defendant, Trae Dorn, intentionally and maliciously published statements on Defendant Nerd & Tie's website on or about August 6, 2015, and September 8, 2015, which falsely represented that the Plaintiff had physically assaulted a vendor at a convention he was running, that his business had harassed another business, and that impinged on his integrity, moral character, and professional reputation.
36. Defendant Trae Dorn's statements were viewed and commented upon by many users of the Defendant Nerd & Tie's website and were reposted on various other websites.
37. Defendant, Christopher Sturz, intentionally and maliciously published statements on his facebook page on or about January 6, 2016, which falsely represented that the Plaintiff

was a rapist.

38. Defendant Christopher Sturz' statements were viewed and commented on by facebook users.

39. The Defendants Trae Dorn, Christopher Sturz, and Nerd & Tie's statements caused the Plaintiff to suffer actual damages including injury to his reputation, emotional distress, and economic injury due to loss of business.

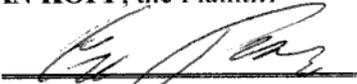
40. The Defendants, Trae Dorn, Christopher Sturz, and Nerd & Tie, posted the statements with willful and wanton disregard for the rights of the Plaintiff.

**WHEREFORE**, Plaintiff, RYAN KOPF, prays that this Court enter a judgment in his favor and against the Defendants, Trae Dorn, Christopher Sturz, and Nerd & Tie, for the actual damages suffered by the Plaintiff as a result of the Defendants' defamatory statements and for punitive damages against the Defendants to deter such conduct in the future, such amounts being in excess of jurisdictional limits of this Court; for an injunction ordering the Defendants to remove the defamatory posts and statements and preventing the Defendants from posting future defamatory statements; for the costs incurred in bringing this action; and for such other and further relief as this Court deems equitable and just in the premises.

#### **JURY DEMAND**

COMES NOW the Plaintiff, RYAN KOPF, by and through his attorney, Eric D. Puryear of Puryear Law, PC, pursuant to Iowa Rule of Civil Procedure 1.902(2) and hereby demands a trial by jury of all issues triable to a jury.

Respectfully submitted,  
**RYAN KOPF**, the Plaintiff

By: 

Eric D. Puryear, AT0010498

**PURYEAR LAW P.C.**

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STATE OF IOWA            )  
  ) ss:  
COUNTY OF Scott        )

Being first duly sworn, I, RYAN KOPF, do depose and state that I am the Plaintiff herein, that I have read the foregoing, know the contents thereof, and that the statements and allegations contained therein are true and correct as I verily believe.

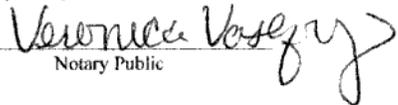
  
**RYAN KOPF**, the Plaintiff

State of Iowa            )  
County of Scott        ) ss:

Signed and sworn to (or affirmed) before me

on 18 Jan 2016

by Ryan Kopf.

  
Notary Public

