

IN THE CIRCUIT COURT FOR COOK COUNTY, ILLINOIS
THIRD MUNICIPAL DISTRICT

RYAN KOPF,
Plaintiff,

vs.

**TRAE DORN, a/k/a ERIC T. DORN,
CHRISTOPHER STURZ, and
NERD & TIE,**
Defendants.

Case No. _____

COMPLAINT AT LAW

Ryan Kopf, the Plaintiff, by and through his attorneys, Puryear Law P.C., 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 Complaint at Law, the Plaintiff respectfully states and alleges the following:

Background

1. The Plaintiff, Ryan Kopf, is a resident of Scott County, Iowa.
2. The Plaintiff owns a business named Chrono Pop L.L.C., which has a principal place of business in Scott County, Iowa, but which organizes conventions around the Midwest, including Anime-ZAP!, QC Anime-zing!, AniMinneapolis, Anime Midwest, Meta Con, and Con Alt Delete.
3. Individuals attending like American comic books, Japanese comics called "Manga," Japanese animated TV shows "Anime", Japanese culture, or other elements of Popular culture. These individuals come to these events to socialize, wear costumes, dance, and meet guest stars.

4. Anime Midwest and Con Alt Delete, in particular, take place in Rosemont, Illinois.
5. The Defendant, Nerd & Tie, is a podcast and news website that covers various anime topics.
6. The Defendant, Trae Dorn, is a resident of Indiana.
7. The Defendant, Trae Dorn, is the creator and producer of Nerd & Tie and writes and publishes numerous blogs on the Defendant Nerd & Tie's website.
8. The Defendant, Trae Dorn, co-founded No Brand Con, a long-running anime convention in Wisconsin.
9. The Defendant, Nerd & Tie, is starting a new anime convention in Wisconsin on September 23-25, 2016, called the Nerd & Tie Expo.
10. The Defendant, Christopher Sturz, is a resident of Wisconsin.
11. The Defendant, Christopher Sturz, is a co-owner of Nerd & Tie and posts blogs on the Defendant Nerd & Tie's website.
12. The Defendant, Sturz, also maintains a Facebook page.
13. On information and belief, the Defendants have participated as vendors in and sold products to Illinois residents at anime conventions in the Chicago, Illinois area, including Anime Central, in Rosemont, Illinois, within the Third Municipal District.

Facts

14. On or about August 18, 2014, the Defendant, Trae Dorn, wrote and posted a blog titled,

- "Do some of Ryan Kopf's Conventions Break the Law? Quite Possibly" on the Defendant Nerd & Tie's website.
15. On or about August 6, 2015, the Defendant Dorn wrote and posted a blog titled "Ryan Kopf's Anime California Harasses, Threatens Maid Cafe Operators After they Refuse to Sign Over Ownership," on the Defendant Nerd & Tie website.
 16. In the blog, the Defendant Dorn states that the Plaintiff is the "poster child for unethical con running."
 17. The Defendant Dorn later states 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."
 18. On or about September 8, 2015, the Defendant Dorn wrote and posted a blog titled "Animecon.org CEO Ryan Kopf Allegedly Attacks Vendor During Metacon 2015" on the Defendant Nerd & Tie's website.
 19. In the blog, the Defendant Dorn accuses the Plaintiff of physically assaulting a vendor, David Silviesu of Plush in the USA, at an anime convention, Metacon, that the Plaintiff and his business were running on September 5, 2015 in Minneapolis, Minnesota.
 20. The Defendant Dorn states in the same blog that the Plaintiff punched the vendor several times after the vendor was told to leave the convention for selling bootleg items at this booth, the vendor refused to leave, and the Plaintiff and his staff blocked attendees from approaching the vendor's booth.

21. The Defendant Dorn, in the same blog, goes on to say that the Plaintiff's "physical overreaction" in striking the vendor was "inexcusable."
22. The Defendant Dorn further states that it is "impossible" not to question the safety of attendees at the Plaintiff's events "if the organizer himself is physically attacking the other people at the events."
23. The Defendant Dorn, in the blog, states that the Plaintiff has an "iffy" professional reputation and that he is a "sketchy con runner." He further characterizes him as a "villain."
24. Many website users commented on the blogs.
25. Furthermore, the blog posts have been re-posted on the Tumblr, Disqus, File770, Facebook, Twitter, and WebMii websites.
26. On or about January 6, 2016, the Defendant Sturz posted on his Facebook page seeking donations and saying "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."
27. On or about January 6, 2016, the Defendant Sturz posted on his Facebook that the Plaintiff is "a rapist." He also suggested that the Plaintiff should pay him in "ball lickings."
28. These comments were publicly available. A simple search online through a search engine for the name "Ryan Kopf" will lead to results containing this post.

29. Thousands of people have seen and read the Defendants' statements, which has caused irreparable injury to the Plaintiff's reputation.

Count I – Defamation *Per Se*

30. The Plaintiff re-alleges and re-asserts the allegations and information contained in paragraphs 1 through 29 as if they were fully set forth below.
31. The Defendant Dorn published statements on the Defendant Nerd & Tie website on or about August 6, 2015 and September 8, 2015, which statements falsely represented that the Plaintiff had physically assaulted a vendor at a convention he was running, and that his business had harassed another business. These statements impinged on the Plaintiff's integrity, moral character, and professional reputation.
32. The Defendant Sturz published statements on his Facebook page on January 6, 2016 which falsely represented that the Plaintiff was a rapist.
33. All of these statements are defamation *per se* as they accused the Plaintiff and/or his business of committing indictable crimes, and they attacked the Plaintiff's integrity, moral character, and professional reputation.

WHEREFORE, the Plaintiff, Ryan Kopf, prays that this Court enter a judgment in his favor and against the Defendants, Dorn, Sturz, and Nerd & Tie, for:

- a. Actual damages suffered by the Plaintiff and his business as a result of the Defendant's defamatory statements in an as-yet-unknown amount that exceeds

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\$50,000;

- b. Punitive damages to deter such conduct in the future;
- c. An injunction for the Defendants to remove their posts and to prevent the Defendants for posting similar statements in the future;
- d. The costs incurred in bringing this action; and

Any such other and further relief that this Court deems equitable and just.

Count II – Defamation *Per Quod*

- 31. The Plaintiff re-alleges and reasserts the statements and allegations in paragraphs 1 through 29 as if fully set forth below.
- 32. The Defendant Dorn maliciously and intentionally published statements on the Defendant Nerd & Tie website on or about August 6, 2015 and September 8, 2015, which statements falsely represented that the Plaintiff had physically assaulted a vendor at a convention he was running and that his business had harassed another business. These statements impinged on the Plaintiff's integrity, moral character, and professional reputation.
- 33. The Defendant Dorn's statements were viewed and commented on by many users of the Defendant Nerd & Tie's website and were further re-posted on various other websites.
- 34. The Defendant 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.
- 35. The Defendant Sturz's comments were viewed and commented on by many Facebook users.

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

WHEREFORE, the Plaintiff, Ryan Kopf, prays that this Court enter a judgment in his favor and against the Defendants, Dorn, Sturz, and Nerd & Tie, for:

- a. Actual damages suffered by the Plaintiff and his business as a result of the Defendant's defamatory statements in an as-yet-unknown amount that exceeds \$50,000;
- b. Punitive damages to deter such conduct in the future;
- c. An injunction for the Defendants to remove their posts and to prevent the Defendants from posting similar statements in the future;
- d. The costs incurred in bringing this action; and
- e. Any such other and further relief that this Court deems equitable and just.

Respectfully submitted,
Ryan Kopf, the Plaintiff

By: 

Eric S. Mail

Illinois ARDC No. 6306491

Cook County No. 60486

PURYEAR LAW P.C.

3719 Bridge Ave, Suite 6

Davenport, IA 52807

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(P): 888-988-3719 (toll-free)

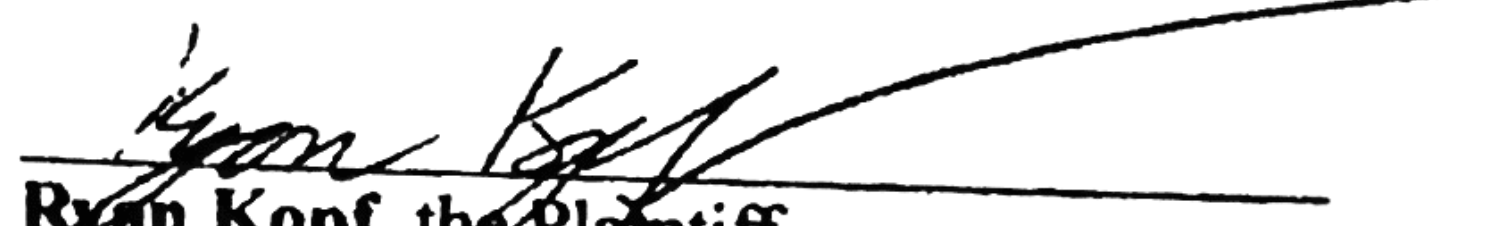
(F): 866.415.5032

eric@puryearlaw.com

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Certification under 735 ILCS 5/1-109

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.


Ryan Kopf, the Plaintiff

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IN THE CIRCUIT COURT FOR COOK COUNTY, ILLINOIS
THIRD MUNICIPAL DISTRICT

RYAN KOPF,
Plaintiff,

vs.

**TRAE DORN, a/k/a ERIC T. DORN,
CHRISTOPHER STURZ, and
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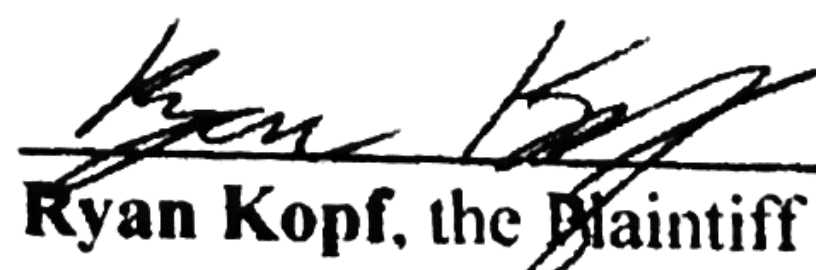
Case No. _____

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(B)

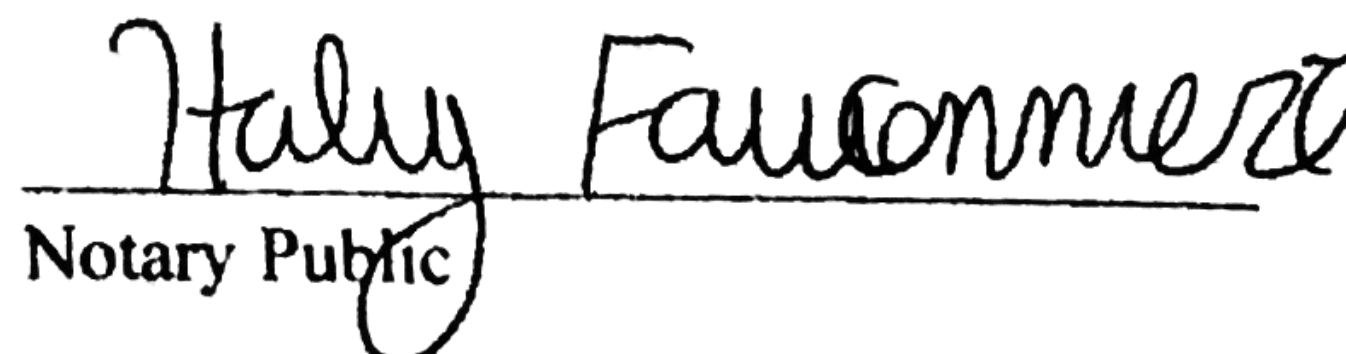
State of Iowa)
) ss
County of Scott)

Pursuant to Supreme Court Rule 222(b), I certify that the Complaint seeks damages greater than \$50,000.

DATED: June 10, 2016


Ryan Kopf, the Plaintiff

Subscribed and sworn to before me this 10th day of June, 2016.


Notary Public



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IN THE CIRCUIT COURT FOR COOK COUNTY,
THIRD MUNICIPAL DISTRICT

CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
SUBURBAN MUNICIPAL DIVISION
CLERK DOROTHY BROWN

RYAN KOPF,
Plaintiff,

vs.

**TRAE DORN, a/k/a ERIC T. DORN,
CHRISTOPHER STURZ, and
NERD & TIE,**

Defendants.

Case No. 2016-M3-003898

APPEARANCE AND JURY DEMAND

Eric S. Mail, of Puryear Law P.C., hereby enters his appearance on behalf of the Plaintiff.
Additionally, the Plaintiff, hereby requests that this matter be heard before a jury of
six (6) persons.

Dated: June 21, 2016

Respectfully submitted,
Ryan Kopf, the Plaintiff

By: 

Eric S. Mail

Illinois ARDC No. 6306491

Cook County No. 60486

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