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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

REBECCA SCOFIELD,

Plaintiff,

v.

ASHLEY GUILLARD,

Defendant.

Case No.

COMPLAINT AND DEMAND FOR
JURY TRIAL

I. INTRODUCTION

1. In November 2022, four students at the University of Idaho were murdered at a home near the campus. The tragedy has garnered attention, and inflicted great sorrow, throughout the University, the State, and the country. Defendant Ashley Guillard—a purported internet sleuth—decided to use the community’s pain for her online self-promotion. She has posted many videos on TikTok falsely stating that Plaintiff Rebecca Scofield (a professor at the University) participated in the murders because she was romantically involved with one of the victims. Guillard’s statements are false. Professor Scofield did not participate in the murders, and

she had never met any of the victims, let alone entered a romantic relationship with them.

Guillard's videos have been viewed millions of times, amplifying Guillard's online persona at the expense of Professor Scofield's reputation. Professor Scofield now sues Guillard for defamation.

II. PARTIES

1. Plaintiff Rebecca Scofield ("Professor Scofield") is an individual residing in Idaho. She is an associate professor and the chair of the history department at the University of Idaho in Moscow, Idaho.

2. Defendant Ashley Guillard ("Guillard") is an individual residing in Texas. She is a TikTok personality who purports to solve crimes online.

III. JURISDICTION AND VENUE

3. Jurisdiction is proper under 28 U.S.C. § 1332 because there is diversity of citizenship and the amount in controversy exceeds \$75,000.

4. Venue is appropriate under 28 U.S.C. § 1391 because Professor Scofield is an Idaho resident and a substantial part of the events giving rise to the claims occurred in Idaho.

IV. FACTUAL ALLEGATIONS

5. In the early morning hours of November 13, 2022, four students at the University of Idaho were tragically murdered in a home near the campus. It is a tragedy that has gripped the entire university community, forever affected the students' families, brought tremendous sorrow throughout the State of Idaho, and garnered national media attention. To respect the privacy of the victims and their families, this Complaint refers to the victims by their initials: K.G., M.M., X.K., and E.C.

6. Professor Scofield was not in Moscow, Idaho, when the murders occurred. She and her husband were in Portland, Oregon, visiting friends. They stayed in a hotel, checking out in the

morning on November 13, after the murders occurred. They drove from Portland to Moscow, a drive of more than five hours, arriving after law enforcement officers had discovered the murders.

7. Professor Scofield did not commit or in any way participate in the murders of the four students.

8. Professor Scofield has taught at the University of Idaho since January 2016. She became the chair of the history department in July 2021.

9. None of the four students who were murdered ever took a class from Professor Scofield. Although the University of Idaho is a relatively small university, she does not recall ever meeting any one of these students.

10. Professor Scofield has also never met Ashley Guillard.

11. Ashley Guillard promotes herself on Amazon and TikTok as an Internet sleuth that solves high-profile unsolved murders by consulting Tarot cards, and performing other readings, to obtain information about the murders. She has purported to solve the murders of musician Kirshnik Khari Ball (a.k.a. Takeoff), Shanquella Robinson, Tiffany Valiante, Kevin Samuels, and the November murders at the University of Idaho.

12. TikTok is a social media platform through which persons can post short videos, typically of no more than 1 or 2 minutes. "TikToks" primarily are recorded by a person using her own cell phone to record a video, and then posting through the person's account on the TikTok platform. Individuals with TikTok accounts can review other people's TikTok accounts, can post comments on the various TikToks, and can repost another TikTok user's posts.

13. On or about November 22, 2022, Guillard began posting TikTok videos about the November murders at the University of Idaho. She asserted that the murderer had some history

with one or more of the victims, and that the murderer was someone who previously was involved with one of the victims, “possibly an ex.”

14. On information and belief, Guillard has never been to Moscow, Idaho or to any other location in Idaho, and that she had no basis to make factual statements about any of the events that have occurred there.

15. On or about November 24, 2022, Guillard posted six TikTok videos to her account, [ashleyisinthebookoflife](#),¹ in which she falsely stated that Professor Scofield, the chair of the history department, was responsible for the four students’ deaths. Two of the TikToks directly and falsely state that Professor Scofield ordered the execution of the four students. Three of the TikToks either falsely implied or directly stated that Professor Scofield had been involved in a relationship with one of the murdered students, K.G.

16. Three of the TikToks Guillard posted to her website on November 24, 2022, also used Professor Scofield’s photo from the University of Idaho website. Upon information and belief, Guillard did not ever receive permission to use Professor Scofield’s official university photograph.

17. Guillard’s November 24, 2022, TikToks were not based on any facts, or any information known to Guillard. Her statements that Professor Scofield ordered the murders, and that Professor Scofield had a relationship with one of the victims, are false.

18. On the following day, November 25, 2022, Guillard posted an additional five TikTok videos falsely alleging that Professor Scofield ordered and planned the murders of the four students. In three of the videos Guillard falsely stated that Professor Scofield and a student at the

¹ Given the continuing nature of Guillard’s tortious conduct, a hyperlink to Guillard’s TikTok account has been provided. Professor Scofield prays for relief against all such false statements whether specifically referenced herein or created after the filing of this Complaint.

University of Idaho, J.D.,² together planned the murders of the four students. Professor Scofield has not met student J.D. and has not ever had him in a class. She has never partnered with him on anything. She did not partner with him to murder the four University of Idaho students.

19. Guillard's November 25, 2022, TikToks were not based on any facts, or any information known to Guillard. Her statements that Professor Scofield partnered with another student to plan or carry out the murders are false.

20. On November 28, 2022, Guillard posted six TikTok videos in which she falsely alleged, either by explicitly stating so or posting text with her videos, that Professor Scofield participated in, or was otherwise responsible for the murders of the four University of Idaho students and that she did so because of her prior relationship with K.G. In one video she wrote the words, "Rebecca Scofield's thoughts as she ordered the murder of the 4 University of Idaho students."

21. Guillard's November 28, 2022, TikToks were not based on any facts, or any information known to Guillard. Her statements that Professor Scofield ordered or in any way participated in the murders or that she was involved in a personal relationship with K.G. are false.

22. By November 28, 2022, Guillard had been directly informed that her TikTok videos alleging that Professor Scofield was involved in the murders were false. Nevertheless, she continued posting her TikTok videos, aware that they were false. In one TikTok video she wrote, "I don't care what y'all say . . . [J.D.] & Rebecca Scofield killed [K.G., M.M. E.C. & X.K.] . . . REBECCA WAS THE ONE TO INITIATE THE PLAN & HIRED [J.D.]"

23. On November 29, 2022, Professor Scofield, through counsel, sent Guillard a cease and desist letter, informing her that her TikTok videos stating that Professor Scofield was involved

² The Complaint uses the initials J.D. to protect the individual's privacy and not perpetuate Guillard's false statements.

in the murders or that she had a romantic relationship with K.G. were false and defamatory, demanding that she take down her defamatory videos, demanding that she cease making such videos, and demanding that she issue an apology to Professor Scofield.

24. Guillard did not stop posting defamatory TikToks falsely stating that Professor Scofield was involved in the murders or that she had a romantic relationship with K.G.

25. On November 29, 2022, and November 30, 2022, Guillard posted additional TikTok videos falsely stating that Professor Scofield was involved in ordering and directing the execution of the murders of the four students. She was not.

26. Since December 1, 2022, Guillard has continued making false statements in her TikTok videos falsely asserting Professor Scofield's involvement in the murder of the four University of Idaho students and falsely stating that Professor Scofield was involved in ordering the murders and was present in Moscow, Idaho, to ensure they were carried out. She falsely stated, inter alia, that: (a) "Rebecca Scofield is going to prison for the murder of the 4 University of Idaho Students whether you like it or not" (December 1, 2022); (b) "I'm not worried about Rebecca Scofield suing me because she will be using her resources to fight four murder cases" . . . "She ordered the execution, the murders of [K.G.], [M.M.], [X.K.] and [E.C.]" (December 1, 2022); (c) that Professor Scofield's motive in ordering the murders and finding someone to carry it out was because she was dating a student (December 4, 2022); (d) Professor Scofield decided to kill the students because K.G. wanted to take a break in their relationship (December 5, 2022); (e) Professor Scofield was going to help the person she hired to carry out the murders achieve the person's dream of playing on the University of Idaho tennis team. (December 5, 2022); (f) J.D. killed the four students because "Becca told me to." (December 6, 2022); and (g) a reporter with

the Spokesman Review newspaper was “protecting the killer” in the article suggesting the TikToks were false (December 12, 2022).

27. As with Guillard’s prior TikToks falsely stating that Professor Scofield was involved in or ordered the murders, Guillard’s December TikToks had no basis in fact. They were false.

28. Persons with TikTok accounts can comment on the TikTok posts of others they follow. Many TikTok users warned Guillard that her statements were false and that she was defaming Professor Scofield, among others. Guillard did not stop making false and defamatory TikToks despite being warned of their falsity multiple times by persons commenting on her TikToks.

29. Equally concerning, other TikTok users commented that they believed Guillard’s false statements that Professor Scofield ordered the murder of K.G., M.M., X.K. and E.C., that Professor Scofield was romantically involved with K.G., and that they have wondered when Professor Scofield would be brought to justice.

30. On December 8, 2022, Professor Scofield, through counsel sent a second cease and desist letter, enclosing the first, and again demanding that Guillard take down her defamatory posts and that Guillard stop making defamatory TikToks.

31. Rather than change her conduct, Guillard made a TikTok showing the cease-and-desist letter (acknowledging she received it) and explaining that if Professor Scofield, through counsel, believed that Guillard was making false statements, counsel would need to “file actual legal documents in a federal court...asking me to remove it. A judge will then determine if I need to remove it.”

32. Also, after receiving the cease-and-desist letter, Guillard on December 18 and 19, 2022, posted more than twenty new TikTok videos falsely stating that Professor Scofield was involved with K.G. and that Professor Scofield's motive for the murders was to keep K.G. from making their relationship public.

33. Guillard has continued to publish false statements about Professor Scofield on TikTok despite having no basis for making the statements and despite being notified numerous times that her statements are false.

34. Professor Scofield has never met Guillard. She does not know her. She does not know why Guillard picked her to repeatedly falsely accuse of ordering the tragic murders and being involved with one of the victims. Professor Scofield does know that she has been harmed by the false TikToks and false statements.

35. Guillard's false TikToks have damaged Professor Scofield's reputation. They have caused her significant emotional distress. She fears for her life and for the lives of her family members. She has incurred costs, including costs to install a security system and security cameras at her residence. She fears that Guillard's false statements may motivate someone to cause harm to her or her family members.

V.

**FIRST CLAIM FOR RELIEF
(DEFAMATION– FALSE STATEMENTS REGARDING MURDERS)**

36. Professor Scofield re-alleges and incorporates by reference all prior paragraphs of this complaint as if set forth in full herein.

37. In her TikTok posts between November 24, 2022, and present³, Guillard made false and defamatory statements implicating Professor Scofield in the murders of the four University of Idaho students more than forty times.

38. As Guillard's false statements involve criminal accusations, they are *per se* defamatory in nature.

39. Guillard knew her statements were false because she had no knowledge about anything happening in Moscow in and around November 13, 2022. Guillard further knew her statements were false because they were not based on any facts, because persons commenting on her posts told her that they were false, and because Professor Scofield twice sent Guillard cease and desist letters regarding the false and defamatory posts.

40. Guillard's false TikToks defamed Professor Scofield because they were viewed millions of times and widely reposted by other TikTok users, resulting in Professor Scofield's name being linked to "murder" in a basic internet search. As a result of Guillard's false statements, Professor Scofield's reputation was injured, and she was subject to online ridicule and threats from Guillard's online commenters. She also fears that she or her family will be the target of physical violence.

41. The online nature of Guillard's false statements continues to harm and damage Professor Scofield. Guillard's TikTok account has more than 100,000 followers, and some of her TikToks defaming Professor Scofield have 2.5 million "likes", indicating that the person has viewed the video and "liked" it.

42. Professor Scofield has been damaged by Guillard's false statements. Her reputation has been tarnished, and she has suffered extreme emotional distress from the constant public

³ fn.1, *supra*.

attention and the ongoing online conversation regarding her “role” in the murders, as falsely alleged by Guillard.

**SECOND CLAIM FOR RELIEF
(DEFAMATION –FALSE STATEMENTS REGARDING RELATIONSHIP)**

43. Professor Scofield re-alleges and incorporates by reference all prior paragraphs of this complaint as if set forth in full herein.

44. In her TikTok posts between November 24, 2022, and the date of this Complaint, Guillard made false and defamatory statements that Professor Scofield was or had been romantically involved with one of the murdered students, K.G.

45. As Guillard’s statements involve moral turpitude, a professor being involved with a student, they are *per se* defamatory in nature.

46. Guillard knew her statements were false because she had no knowledge about anything happening in Moscow, Idaho, or at the University of Idaho. She does not know Professor Scofield, and did not know K.G. Guillard further knew her statements were false because they were not based on any facts, because persons commenting on her posts told her that they were false, and because Professor Scofield twice sent Guillard cease and desist letters regarding the false and defamatory posts but Guillard continued thereafter to post additional TikTok videos with false statements.

47. Guillard’s false TikToks defamed Professor Scofield because they were viewed millions of times and widely reposted by other TikTok users. Guillard’s false statements defamed Professor Scofield’s professional reputation and career at the University of Idaho as university policy prohibits faculty members from having romantic relationships with university students. As a result of Guillard’s false statements, Professor Scofield’s reputation was injured, and she was subject to online ridicule and threats from Guillard’s online commenters.

48. Professor Scofield has been damaged by Guillard's false statements. Her reputation has been tarnished, and she has suffered extreme emotional distress from the constant public attention and the ongoing online conversation discussing the false relationship with a student, as falsely alleged by Guillard.

VI. ATTORNEY'S FEES

49. As a result of Guillard's conduct, Professor Scofield has been required to retain the services of Stoel Rives LLP. Plaintiff requests that she be reimbursed for all reasonable attorney's fees and costs as permitted under federal and state law.

VII. PRAYER FOR RELIEF

Professor Scofield prays for judgment in her favor and against Guillard, as well as:

1. Compensatory and punitive damages in an amount to be proved at trial;
2. Attorney's fees, costs, and disbursements incurred here;
3. Pre-judgment and post-judgment interest; and
4. All such other relief as the Court deems just and equitable.

VIII. DEMAND FOR JURY TRIAL

Professor Scofield requests trial by jury of not less than 12 persons as to all issues triable to a jury.

DATED: December 21, 2022.

STOEL RIVES LLP

/s/ Wendy J. Olson _____

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Elijah M. Watkins

Cory M. Carone

Attorneys for Plaintiff