

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**LOGAN PAUL**  
*Plaintiff*

v.

**STEPHEN FINDEISEN AND  
COFFEE BREAK PRODUCTIONS  
LLC'S D/B/A COFEEZILLA**  
*Defendants*

**Civil Action No. 5:24-cv-717**

**JURY TRIAL DEMANDED**

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**DEFENDANTS STEPHEN FINDEISEN AND COFFEE BREAK PRODUCTIONS  
LLC'S ORIGINAL ANSWER & JURY DEMAND**

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NOW COMES Defendants Stephen Findeisen and Coffee Break Productions LLC,  
by their counsel Farrar & Ball, LLP, who file this Answer and state the following:

**GENERALLY APPLICABLE DENIALS**

Defendants make the following generally applicable denials:

- Defendants deny making any false or defamatory statement.
- Defendants deny making any false or defamatory implication.
- Defendants deny acting with negligence or actual malice.
- Defendants deny that Plaintiff sustained any damages.

**NATURE OF THE ACTION**

1. Defendants deny the allegations contained in paragraph 1 of the Complaint.
2. Defendants deny the allegations contained in paragraph 2 of the Complaint.
3. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 3 of the Complaint, as the CryptoZoo

game was never delivered, and Defendants are unable to speculate as to how this hypothetical game would have actually operated were it ever completed.

4. Defendants deny the allegations contained in paragraph 4 of the Complaint.

5. Defendants deny the allegations contained in paragraph 5 of the Complaint.

6. Defendants deny the allegations contained in paragraph 6 of the Complaint.

7. Defendants deny the allegations contained in paragraph 7 of the Complaint.

8. Defendants deny the allegations contained in paragraph 8 of the Complaint.

9. Defendants deny the allegations contained in paragraph 9 of the Complaint.

10. Defendants deny the allegations contained in paragraph 10 of the Complaint.

11. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 11 of the Complaint.

12. Defendants deny the allegations contained in paragraph 12 of the Complaint.

13. Defendants deny the allegations contained in paragraph 13 of the Complaint.

#### **PARTIES**

14. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 14 of the Complaint.

15. Defendants admit the allegation in paragraph 15.

16. Defendants admit the allegations contained in paragraph 16 of the Complaint.

#### **JURISDICTION & VENUE**

17. Defendants deny the allegation in paragraph 17 of the Complaint that the amount in controversy exceeds \$75,000, as Plaintiff has a global reputation as a serial liar, tasteless exploiter, and untrustworthy entrepreneur, and he is incapable of sustaining more

than \$75,000 in damage to his already sullied reputation. Defendants further deny that Plaintiff is capable of being damaged from allegations of unfair or improper business dealings, as Plaintiff was already infamous for various business ventures which have been widely characterized as unfair or improper.

18. Defendants admit the allegations contained in paragraph 18 of the Complaint.

19. Defendants admit the allegations contained in paragraph 19 of the Complaint.

### **FACTUAL ALLEGATIONS**

20. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 20 of the Complaint.

21. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 21 of the Complaint.

22. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 22 of the Complaint.

23. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 23 of the Complaint.

24. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 24 of the Complaint.

25. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 25 of the Complaint.

26. Defendants admit the allegations contained in paragraph 26 of the Complaint.

27. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 27 of the Complaint.

28. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 28 of the Complaint.

29. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 29 of the Complaint.

30. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 30 of the Complaint.

31. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 31 of the Complaint.

32. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 32 of the Complaint.

33. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 33 of the Complaint.

34. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 34 of the Complaint.

35. Defendants deny the allegations contained in paragraph 35 of the Complaint.

36. Defendants deny the allegations contained in paragraph 36 of the Complaint.

37. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 37 of the Complaint.

38. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 38 of the Complaint.

39. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 39 of the Complaint.

40. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 40 of the Complaint.

41. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 41 of the Complaint.

42. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 42 of the Complaint.

43. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 43 of the Complaint.

44. Defendants deny the allegations contained in paragraph 44 of the Complaint.

45. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 45 of the Complaint.

46. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 46 of the Complaint.

47. Defendants deny the allegations contained in paragraph 47 of the Complaint.

48. Defendants deny the allegations contained in paragraph 48 of the Complaint.

49. Defendants deny the allegations contained in paragraph 49 of the Complaint.

50. Defendants deny the allegations contained in paragraph 50 of the Complaint.

51. Defendants deny the allegations contained in paragraph 51 of the Complaint.

52. Defendants deny the allegations contained in paragraph 52 of the Complaint.

53. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 53 of the Complaint.

54. Defendants deny the allegations contained in paragraph 54 of the Complaint.

55. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 55 of the Complaint.

56. Defendants deny the allegations contained in paragraph 56 of the Complaint.

57. Defendants deny the allegations contained in paragraph 57 of the Complaint.

58. Defendants admit the allegations contained in paragraph 58 of the Complaint.

59. Defendants admit the allegations contained in paragraph 59 of the Complaint.

60. Defendants admit the allegations contained in paragraph 60 of the Complaint.

61. Defendants admit the allegations contained in paragraph 61 of the Complaint.

62. Defendants admit the allegations contained in paragraph 62 of the Complaint.

63. Defendants admit the allegations contained in paragraph 63 of the Complaint.

64. Defendants admit the allegations contained in paragraph 64 of the Complaint.

65. Defendants deny the allegations contained in paragraph 65 of the Complaint.

66. Defendants deny the allegations contained in paragraph 66 of the Complaint.

67. Defendants deny the allegations contained in paragraph 67 of the Complaint.

68. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 68 of the Complaint.

69. Defendants deny the allegations contained in paragraph 69 of the Complaint.

70. Defendants admit the allegations contained in paragraph 70 of the Complaint.

71. Defendants deny the allegations contained in paragraph 71 of the Complaint.

72. Defendants admit the allegations contained in paragraph 72 of the Complaint.

73. Defendants deny the characterization of the video contained in paragraph 73 of the Complaint. The video speaks for itself.

74. Defendants deny the characterization of the video contained in paragraph 74 of the Complaint. The video speaks for itself.

75. Defendants deny the characterization of the video contained in paragraph 75 of the Complaint. The video speaks for itself.

76. Defendants deny the characterization of the video contained in paragraph 76 of the Complaint. The video speaks for itself.

77. Defendants deny the characterization of the video contained in paragraph 77 of the Complaint. The video speaks for itself.

78. Defendants admit the allegations contained in paragraph 78 of the Complaint.

79. Defendants deny the characterization of the video contained in paragraph 79 of the Complaint. The video speaks for itself.

80. Defendants deny the characterization of the video contained in paragraph 80 of the Complaint. The video speaks for itself.

81. Defendants deny the characterization of the video contained in paragraph 81 of the Complaint. The video speaks for itself.

82. Defendants deny the characterization of the video contained in paragraph 82 of the Complaint. The video speaks for itself.

83. Defendants admit the allegations contained in paragraph 83 of the Complaint.

84. Defendants deny the characterization of the video contained in paragraph 84 of the Complaint. The video speaks for itself.

85. Defendants deny the characterization of the video contained in paragraph 85 of the Complaint. The video speaks for itself.

86. Defendants deny the characterization of the video contained in paragraph 86 of the Complaint. The video speaks for itself.

87. Defendants deny the characterization of the video contained in paragraph 87 of the Complaint. The video speaks for itself.

88. Defendants deny the characterization of the video contained in paragraph 88 of the Complaint. The video speaks for itself.

89. Defendants deny the allegations contained in paragraph 89 of the Complaint.

90. Defendants deny the characterization of the video contained in paragraph 90 of the Complaint. The video speaks for itself.

91. Defendants deny the allegations contained in paragraph 91 of the Complaint.

92. Defendants deny the characterization of the video contained in paragraph 92 of the Complaint. The video speaks for itself.

93. Defendants deny the characterization of the video contained in paragraph 93 of the Complaint. The video speaks for itself.

94. Defendants deny the characterization of the video contained in paragraph 94 of the Complaint. The video speaks for itself.

95. Defendants deny the characterization of the video contained in paragraph 95 of the Complaint. The video speaks for itself.

96. Defendants deny the characterization of the video contained in paragraph 96 of the Complaint. The video speaks for itself.

97. Defendants deny the allegations contained in paragraph 97 of the Complaint.

98. Defendants deny the allegations contained in paragraph 98 of the Complaint.



99. Defendants deny the allegations contained in paragraph 99 of the Complaint.

100. Defendants deny the allegations contained in paragraph 100 of the Complaint.

101. Defendants deny the allegations contained in paragraph 101 of the Complaint.

102. Defendants deny the allegations contained in paragraph 102 of the Complaint.

103. Defendants deny the allegations contained in paragraph 103 of the Complaint.

104. Defendants deny the allegations contained in paragraph 104 of the Complaint.

105. Defendants deny the characterization of the video contained in paragraph 105 of the Complaint. The video speaks for itself.

106. Defendants deny the characterization of the video contained in paragraph 106 of the Complaint. The video speaks for itself.

107. Defendants deny the allegations contained in paragraph 107 of the Complaint.

108. Defendants deny the allegations contained in paragraph 108 of the Complaint.

109. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 109 of the Complaint.

110. Defendants deny the characterization of the video contained in paragraph 110

of the Complaint. The video speaks for itself.

111. Defendants deny the allegations contained in paragraph 111 of the Complaint.

112. Defendants deny the allegations contained in paragraph 112 of the Complaint.

113. Defendants deny the allegations contained in paragraph 113 of the Complaint.

114. Defendants deny the allegations contained in paragraph 114 of the Complaint.

115. Defendants deny the allegations contained in paragraph 115 of the Complaint.

116. Defendants deny the allegations contained in paragraph 116 of the Complaint.

117. Defendants deny the allegations contained in paragraph 117 of the Complaint.

118. Defendants deny the allegations contained in paragraph 118 of the Complaint.

119. Defendants deny the allegations contained in paragraph 119 of the Complaint.

120. Defendants deny the allegations contained in paragraph 120 of the Complaint.

121. Defendants lack sufficient information or knowledge sufficient to form a

belief as to the truth of matters contained in paragraph 121 of the Complaint.

122. Defendants deny the allegations contained in paragraph 122 of the Complaint.

123. Defendants deny the allegations contained in paragraph 123 of the Complaint.

124. Defendants deny the allegations contained in paragraph 124 of the Complaint.

125. Defendants deny the allegations contained in paragraph 125 of the Complaint.

126. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 126 of the Complaint.

127. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 127 of the Complaint.

128. Defendants deny the allegations contained in paragraph 128 of the Complaint.

129. Defendants deny the allegations contained in paragraph 129 of the Complaint.

130. Defendants admit the allegations contained in paragraph 130 of the Complaint.

131. Defendants deny the allegations contained in paragraph 131 of the Complaint.

132. Defendants deny the allegations contained in paragraph 132 of the

Complaint.

133. Defendants deny the allegations contained in paragraph 133 of the Complaint.

134. Defendants admit the allegations contained in paragraph 134 of the Complaint.

135. Defendants admit the allegations contained in paragraph 135 of the Complaint.

136. Defendants deny the allegations contained in paragraph 136 of the Complaint.

137. Defendants deny the characterization of the video contained in paragraph 137 of the Complaint. The video speaks for itself.

138. Defendants deny the allegations contained in paragraph 138 of the Complaint.

139. Defendants admit the allegations contained in paragraph 139 of the Complaint.

140. Defendants deny the allegations contained in paragraph 140 of the Complaint.

141. Defendants deny the allegations contained in paragraph 141 of the Complaint.

142. Defendants deny the allegations contained in paragraph 142 of the Complaint.

143. Defendants deny the characterization of the video contained in paragraph 143

of the Complaint. The video speaks for itself.

144. Defendants deny the allegations contained in paragraph 144 of the Complaint.

145. Defendants admit the allegations contained in paragraph 145 of the Complaint.

146. Defendants deny the characterization of the video contained in paragraph 146 of the Complaint. The video speaks for itself.

147. Defendants deny the allegations contained in paragraph 147 of the Complaint.

148. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 148 of the Complaint.

149. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 149 of the Complaint.

150. Defendants deny the allegations contained in paragraph 150 of the Complaint.

151. Defendants lack sufficient information or knowledge sufficient to form a belief as to the truth of matters contained in paragraph 151 of the Complaint.

152. Defendants deny the allegations contained in paragraph 152 of the Complaint.

153. Defendants deny the allegations contained in paragraph 153 of the Complaint.

154. Defendants deny the allegations contained in paragraph 154 of the

Complaint.

155. Defendants deny the allegations contained in paragraph 155 of the Complaint.

156. Defendants deny the allegations contained in paragraph 156 of the Complaint.

157. Defendants deny the allegations contained in paragraph 157 of the Complaint.

158. Defendants deny the allegations contained in paragraph 158 of the Complaint.

159. Defendants deny the allegations contained in paragraph 159 of the Complaint.

160. Defendants deny the allegations contained in paragraph 160 of the Complaint.

161. Defendants deny the allegations contained in paragraph 161 of the Complaint.

162. Defendants deny the allegations contained in paragraph 162 of the Complaint.

**FIRST CLAIM FOR RELIEF**  
**LIBEL PER SE FOR STATEMENTS IN THE JUNE 29, 2023 X POST**

163. Paragraph 163 incorporates prior paragraphs and requires no additional response.

164. Defendants admit the allegations contained in paragraph 164 of the

Complaint.

165. Defendants admit the allegations contained in paragraph 165 of the Complaint.

166. Defendants admit the allegations contained in paragraph 166 of the Complaint.

167. Defendants admit the allegations contained in paragraph 167 of the Complaint.

168. Defendants deny the allegations contained in paragraph 168 of the Complaint.

169. Defendants deny the allegations contained in paragraph 169 of the Complaint.

170. Defendants deny the allegations contained in paragraph 170 of the Complaint.

171. Defendants deny the allegations contained in paragraph 171 of the Complaint.

172. Defendants deny the allegations contained in paragraph 172 of the Complaint.

173. Defendants deny the allegations contained in paragraph 173 of the Complaint.

**SECOND CLAIM FOR RELIEF  
LIBEL PER SE FOR STATEMENTS IN THE JUNE 30, 2023 YOUTUBE VIDEO,  
“LOGAN PAUL’S SCAM ISN’T OVER”**

174. Paragraph 174 incorporates prior paragraphs and requires no additional

response.

175. Defendants admit the allegations contained in paragraph 175 of the Complaint.

176. Defendants deny the allegations contained in paragraph 176 of the Complaint.

177. Defendants admit the allegations contained in paragraph 177 of the Complaint.

178. Defendants admit the allegations contained in paragraph 178 of the Complaint.

179. Defendants deny the allegations contained in paragraph 179 of the Complaint.

180. Defendants deny the allegations contained in paragraph 180 of the Complaint.

181. Defendants deny the allegations contained in paragraph 181 of the Complaint.

182. Defendants deny the allegations contained in paragraph 182 of the Complaint.

183. Defendants deny the allegations contained in paragraph 183 of the Complaint.

184. Defendants deny the allegations contained in paragraph 184 of the Complaint.



**SECOND CLAIM FOR RELIEF  
LIBEL PER SE FOR STATEMENTS IN THE JANUARY 5, 2024 YOUTUBE  
VIDEO,  
“LOGAN PAUL’S ‘REFUND’”**

185. Paragraph 185 incorporates prior paragraphs and requires no additional response.

186. Defendants admit the allegations contained in paragraph 186 of the Complaint.

187. Defendants deny the characterization of the video contained in paragraph 187 of the Complaint. The video speaks for itself.

188. Defendants admit the allegations contained in paragraph 188 of the Complaint.

189. Defendants admit the allegations contained in paragraph 189 of the Complaint.

190. Defendants deny the allegations contained in paragraph 190 of the Complaint.

191. Defendants deny the allegations contained in paragraph 191 of the Complaint.

192. Defendants deny the allegations contained in paragraph 192 of the Complaint.

193. Defendants deny the allegations contained in paragraph 193 of the Complaint.

194. Defendants deny the allegations contained in paragraph 194 of the

Complaint.

195. Defendants deny the allegations contained in paragraph 195 of the Complaint.

### **DEFENSES**

1. The Complaint fails to state causes of action upon which relief may be granted.

2. The statements at issue were not false statements of fact.

3. The statements at issue were not capable of a defamatory meaning.

4. The statements at issue were constitutionally protected opinions.

5. The statements at issue were in all respects literally true.

6. The statements at issue were in all respects substantially true.

7. Plaintiff is a general-purpose public figure, or alternatively, a limited purpose public figure regarding his CryptoZoo project and other prior controversies involving cryptocurrency schemes, and Plaintiff cannot establish that Defendants acted with actual malice.

8. The statements at issue were about matters of public concern and immune from liability under the fair report privilege.

9. The statements at issue were privileged as a reasonable and fair comment on a matter of public concern published for general information.

10. Plaintiff ratified, approved, and consented to prior similar statements by Defendants. Plaintiff, by words and conduct, expressly or impliedly authorized or consented to the publication of subsequent statements by Defendants, or the publications

were done in the manner that Plaintiff consented to, or which Defendants reasonably believed Plaintiff had consented to.

11. Plaintiff has failed to mitigate any damages he has incurred.

12. Plaintiffs' claims are barred, in whole or in part, because Defendants' conduct did not cause, proximately cause, solely cause, or solely proximately cause the damages claimed by Plaintiff to the extent any exist, which is denied.

13. Plaintiff is barred from seeking exemplary damages because of his failure to comply with the Texas Defamation Mitigation Act.

14. Defendants reserve the right to amend their Answer to assert additional affirmative defenses.

#### **JURY DEMAND**

Defendants demand trial by jury.

#### **PRAYER**

WHEREFORE, Defendants request that the Court dismiss the Complaint against them with prejudice and award costs and attorneys' fees due to them and award any other relief the Court deems just and proper.

*[signature page follows]*

Respectfully submitted,

**FARRAR & BALL, LLP**

*/s/ William R. Ogden*

WILLIAM R. OGDEN

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MARK BANKSTON

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**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing has been served via the CM/ECF system on counsel of record this 5<sup>th</sup> day of August 2024.

*/s/ William R. Ogden*

WILLIAM R. OGDEN