

U.S. DISTRICT COURT
DISTRICT OF VERMONT
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CLERK
LAW
DEPUTY CLERK

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

CHRISTOPHER HELALI,)
)
) *Plaintiff,*)
)
) v.)
)
) ZIPPORAH LEGARDE and PETER)
) SOELLER,)
)
) *Defendants.*)

Jury Trial Demanded BY LAW
DEPUTY CLERK

Civil Action No.: 2:21-cv-141

COMPLAINT

Plaintiff Christopher Helali (“Plaintiff,” “Mr. Helali” or “Christopher”), by and through his undersigned counsel, and for his Complaint against Defendants Zipporah Legarde and Peter Soeller, alleges as follows:

INTRODUCTION

1. Mr. Helali, a citizen of the State of Vermont, brings this diversity action against Defendants Zipporah Legarde and Peter Soeller, who are citizens of the Commonwealth of Massachusetts and the State of Connecticut, respectively, for defamation *per se* and defamation, including for making the willfully and maliciously false accusations that Mr. Helali is a rapist, thief and embezzler, and that he raped Defendant Zipporah Legarde.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1) because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different states.

3. Mr. Helali seeks an amount greater than \$75,000 from each Defendant for presumed damages, and an additional amount greater than \$75,000 from each Defendant in compensatory damages for actual and ongoing reputational, emotional, professional and monetary injuries suffered as a direct and proximate result of Defendants' below-described defamatory and defamatory *per se* statements and publications. In addition, Mr. Helali seeks punitive damages in amounts greater than \$150,000 for each of the three Counts, below.

4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(1) because Mr. Helali resides in the District of Vermont.

5. In addition, venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because and a substantial part of the events or omissions giving rise to Mr. Helali's claims occurred in the District of Vermont.

PARTIES

6. Mr. Helali is a citizen of the State of Vermont, residing in the Town of Vershire.

7. Defendant Zipporah Legarde ("Ms. Legarde" or "Zipporah") is a citizen of the Commonwealth of Massachusetts, residing in Taunton.

8. Defendant Peter Soeller ("Mr. Soeller" or "Peter") is a citizen of the State of Connecticut, residing in Mystic. Mr. Soeller operates a website known as Fashbusters.com and a Twitter account using the handle, "@fash_busters."

GOVERNING SUBSTANTIVE LAW

9. This is a diversity action, so this Court applies the choice-of-law principles of Vermont.

10. For tort claims such as the ones in this Complaint, Vermont follows the Restatement (Second) of Conflict of Laws (“Restatement (Second)”) to determine the applicable substantive law.

11. Pursuant to Restatement (Second) Section 150, which governs multistate defamation, including statements published on the Internet, the applicable substantive law to be applied is the law of the state with the most significant relationship to the occurrence and the parties under the principles stated in Restatement (Second) Section 6.

12. The substantive law of Vermont governs this case because Mr. Helali is a citizen of Vermont and the harms caused by Defendants’ defamatory statements and actions are greatest in Vermont. In addition, Vermont has a strong interest in protecting its citizens from defamation.

FACTUAL BACKGROUND

13. Mr. Helali and Ms. Legarde met online in the spring of 2016 when they both lived in the Boston area.

14. Mr. Helali and Ms. Legarde dated from March to May of 2016.

15. During their two-month romantic relationship, Mr. Helali and Ms. Legarde expressed their love for each other on multiple occasions.

16. During their two-month romantic relationship, Mr. Helali and Ms. Legarde attempted on multiple occasions to conceive a child via sexual intercourse.

17. Their sexual relations were always consensual.

18. At all relevant times, Ms. Legarde was mentally and physically capable of choosing whether to engage in sexual behavior with Mr. Helali and she chose to do so.

19. At all relevant times, Mr. Helali was mentally and physically capable of choosing whether to engage in sexual behavior with Ms. Legarde and he chose to do so.

20. Mr. Helali discussed with Ms. Legarde at the time the fact that in 2012 he applied to be a sperm donor and was rejected due to a low sperm count, and that therefore he might not be able to conceive a child. See Exhibit A.

21. Mr. Helali and Ms. Legarde's romantic relationship ended in May 2016.

22. Ms. Legarde discovered she was pregnant on or about June 21, 2016.

23. On June 25, 2016 at approximately 11:26 PM, Ms. Legarde sent Mr. Helali an email message to let him know she was pregnant. She wrote in part:

I found out Tuesday that I'm pregnant.

I know it's not exactly unexpected, but I think maybe it's worth us discussing because I am definitely worried about everything and we don't know each other very well. But I think we should talk about our/my options, and just how you feel about it. But it might also be too early to make any definite plans. I won't know until I can schedule an appointment at the clinic out here in Western Massachusetts. (I think that's where I am...)

I'm at the summer camp right now, and it's long days, and I'm super tired now. But I hope you're well, discovering more (though I wonder how you could possibly know more), and just...happy. And I'm sorry your stressed and I hope my news doesn't add to that too much.

See Exhibit B.

24. Five hours later, on June 26, 2016 at approximately 4:40 AM, Mr. Helali sent Ms. Legarde an email message in which he wrote as follows:

Hey love!

Its [sic] so good to hear from you and I was wondering why I couldn't message you via facebook. Glad to hear you are well.

I am happy, nervous and worried to hear you are pregnant. Happy to hear that what we tried to do actually worked out <3 I am nervous and worried because I am in the process of heading to Syria to fight for the Kurdish YPG. I don't think I will return to the USA for a year or so, if ever. I honestly feel horrible having

you raise a child while being young and single and would rather there be a community that could be there for the child etc. Also, having an abortion also seems perfectly valid and I am in favor of any decision you think is appropriate. Let me know what I can do to help and I send you and the little one my love :* <3

See Exhibit B.

25. Mr. Helali followed up his June 26, 2016 (4:40 AM) email message with a second email message to Ms. Legarde that day at 11:39 AM in which he wrote: “PS I am sad you concealed the truth again for the second time :(” See Exhibit B.

26. Ms. Legarde responded via email on June 26, 2016 at 11:57 AM, in which she was supportive of Mr. Helali’s desire and plan to travel to Syria to fight against ISIS. She wrote as follows:

Yeah, I don’t feel great about it but that’s why I was honest with you about what was going on because I felt you deserved to know and I wanted you to know.

I’m more than likely returning home or to Baltimore. I’m still deciding; do you care to have a role in the decision-making or care-taking? Those would be helpful to know. Would you like to be notified when I make a decision?

I’m leaning towards keeping the baby, but I’m worried about what that would mean in regards to me and you. I think I would rather raise him/her in a APOC [Anarchist People of Color] community in a less traditional nuclear family setting, and if you have plans of coming back, I’m worried about how you would factor in as most I know and trust are distinctly black.

I’m familiar through my ex about the situation with the Kurdish YPG - he always framed it as a path he knew a few anarchists had taken. I think it sounds really important and I’m glad you’ve chosen to build better futures for humanity in that way. I would be comfortable sending you updates if that’s possible, but I totally respect if you’d rather your involvement ends here since you’re leaving the US permanently, and do wonder if maybe that is best, but I want to respect your rights as a member of this child’s genetic family.

We never really knew each other that well, but just let me know how you're feeling/thinking.

See Exhibit B.

27. Mr. Helali replied to Ms. Legarde via email on June 26, 2016 at approximately 1:14 PM, expressing his desire to be a major part of their child's life. He wrote as follows:

Absolutely I would like to be a major part of the child's life and would like the child to also grow up proud of their heritage from my end as well. Greece, Iran and Kurdistan boast an amazing history as does my family that the child can learn from and strive to succeed. I also think its [sic] important to have a strong family committed to principles and causes worth fighting for. I don't think it would be right to abandon the child or have you do all the work alone as I constitute [sic] exactly half of its genetic code haha.

In any event, let me know what you decide to do. I think your decision is what counts and I will respect whatever you decide. A child will change both of our lives but I want us to remain integral parts of the child's life and to help in developing them into the best they can be.

I think an all black community would be great but also rob the child of their holdings and stakes here. The child would be entitled to Iranian, Greek and Canadian citizenship via me. As well as land and a home.

This is an important conversation and I think an interracial child with our unique backgrounds deserves to cultivate them all and truly become a global citizen. Do you simply want us to have a caretaker role or do you still have feelings for me? I am sad that this seems far too formal and not as "loveey doveey" as I wished.

See Exhibit B.

28. Ms. Legarde responded on June 26, 2016 at 2:27 PM. She wrote:

I think we should Skype and talk about everything.

I still have feelings for you, but I am unsure if the short romance we had can be built upon with a baby added to that.

See Exhibit B.

29. Mr. Helali made multiple attempts to speak with Ms. Legarde via Skype between June 26 and July 11, 2016, but Ms. Legarde did not log in to Skype during that time, so a Skype conversation never occurred.

30. On November 24, 2016, Ms. Legarde wrote to Mr. Helali's parents to introduce herself and to let them know she would be having a baby. Ms. Legarde wrote as follows:

Hello. We haven't met before, but my name is Zipporah and I am a friend of your son, Christopher.

I've been told by Chris y'all are very lovely people, so that made it a lot easier to write this letter. I wanted to reach out because Chris and I are expecting a baby in February [2017].

Chris really wanted to wait and surprise y'all when he returned in December, but as his activism there might delay his return, it seemed best to tell you now.

I imagine y'all would like to know a little about me. I'm a black woman from New Orleans, Louisiana, and I moved to Boston last year. I studied English Literature in college, and want to start a graduate program at Lesley University in Art Therapy. I'm a spoken word artist, a writer, and, of course, an activist, which is how Chris and I met. ☺

I hope we can meet really soon and get a chance to commune with each other.

Sincerely,

Zipporah Legarde

See Exhibit C.

31. In December 2016, Mr. Helali and Ms. Legarde met in-person in Boston and Paxton, Massachusetts. During this meeting, they discussed Mr. Helali's plans to travel to Syria. He said he expected to be there for approximately four years.

32. Mr. Helali left the United States for Syria in January 2017.

33. In 2017, Ms. Legarde gave birth to a daughter, SAL. [*SAL's real name and the month and day of her birth are intentionally omitted per Fed. R. Civ. P. 5.2(a).*]

34. Mr. Helali is SAL's biological father, as confirmed by a January 2019 paternity test.

35. Mr. Helali returned to the United States from Syria sooner than originally planned and expected. He arrived back in the United States in September 2017.

36. Upon Mr. Helali's return to the United States in September 2017, he lived in Hanover, New Hampshire for a few months before settling in the Town of Vershire, Vermont.

37. Beginning in December 2018, after she learned that Mr. Helali had returned to the United States, Ms. Legarde began engaging in threatening and abusive behavior toward Mr. Helali that escalated dramatically over time.

38. On December 5, 2018, Ms. Legarde sent Mr. Helali text messages via the Signal app stating, "I want you DEAD" and "I wish you had died. I prayed for you to die as many times as I hoped the opposite." See Exhibit D.

39. Also in December 2018, Ms. Legarde contacted the Title IX office of Dartmouth College, where Mr. Helali was/is a graduate student, in an attempt to have him expelled from the program.

40. On December 31, 2018, Ms. Legarde texted Mr. Helali to threaten him with continued harassment, writing that "I hope ur [sic] ready for 20 years of these sick burns." See Exhibit E.

41. On January 1, 2019, Ms. Legarde sent Mr. Helali a screenshot of herself and their child SAL with the caption, "Happy New Year FB – Ruin your enemies' lives, drink their blood upon the highest terrace. Feed your Children the Blood of your Bosom."

#RegardsFromThe[_____].” See **Exhibit F**. [*The portion of the hashtag between the brackets is intentionally omitted per Fed. R. Civ. P. 5.2(a).*]

42. On January 8, 2019, Ms. Legarde wrote to Mr. Helali to say that “Man I should have worked for the FBI u [sic] have to admit my sleuthing skills are really good.” See **Exhibit G**.

43. On January 9, 2019, Ms. Legarde wrote to Mr. Helali to say that “U [sic] make me so angry sometimes. I would never sell u [sic] out bc [sic] if you cross me I can handle you myself no need to call the FBI except to tell them where to collect the body. . . .” See **Exhibit H**.

44. Mr. Helali ceased communicating with Ms. Legarde on January 23, 2019. Thereafter, her threatening behavior only got worse.

45. On March 25, 2019, Ms. Legarde, under the username “u/melanin_choly,” issued an “abuser alert” on Reddit revealing personal information about Mr. Helali, causing him to fear for his personal safety.

46. On April 12 and April 14, 2019, Ms. Legarde and two other people contacted Mr. Helali and threatened him with physical violence. They called his phone and left threatening voicemails and also sent him messages via WhatsApp Messenger. One of these people threatened to give Mr. Helali a vasectomy. Ms. Legarde threatened to open up a blog titled with Mr. Helali’s name to serve as a vehicle for her to harass him.

47. On April 12, 2019, Ms. Legarde sent a text message to Mr. Helali’s brother, Peter Helali, in which she wrote: “After I fuck up ur [sic] brother’s career, why don’t you holla? I’d maybe still fuck you.” See **Exhibit I**.

48. Also on April 12, 2019, Ms. Legarde left Mr. Helali a voicemail in which she said to him in part that “your life doesn’t concern me, but I am very much looking forward to destroying it, though.”

49. Between April 22, 2019 and January 22, 2021, to try to protect himself from the increasing threats from Ms. Legarde, Mr. Helali attempted on three separate occasions to obtain a relief-from-abuse order from the Family Division of the Vermont Superior Court – Orange Unit.

50. Ultimately, Mr. Helali’s efforts to obtain a relief-from-abuse order against Ms. Legarde were unsuccessful because the Family Division concluded on January 22, 2021 that “while [Ms. Legarde’s] conduct may be unwanted, distressing, intrusive, and painful for [Mr. Helali],” her conduct did not constitute “stalking” within the meaning of Vermont’s Abuse Prevention Act, 15 V.S.A. § 1101 *et seq.*

51. Following Mr. Helali’s unsuccessful efforts to obtain a relief-from-abuse order against Ms. Legarde, she embarked on a willful, malicious, relentless and vicious defamation campaign against him, attempting to make good on her April 12, 2019 threat to “fuck up” Mr. Helali’s career. See Exhibit I.

Ms. Legarde Falsely Accuses Mr. Helali of Being a Rapist and Raping Her

52. On or about February 6, 2021, Ms. Legarde published statements on Twitter falsely accusing Mr. Helali of being her “rapist” and of having “raped” her:

← **Tweet**



C.S. Who Dis? @doja_bird · Feb 6

...

My rapist, Chris Helali, has refused for 2 years now to terminate parental rights, & filed for 50/50 custody, despite having met our daughter once at the paternity testing clinic. During his deposition last week, he could not recall our daughter's birthday.

Q. Okay. Can you give me the names and dates of birth of your children?

A. So Sojourner, of course, who you know, is February, I think it was 27, 2017; and

24

165

401



53. On or about February 23, 2021, Ms. Legarde published a statement on Twitter falsely referring to Mr. Helali as “my 30+ yr old r*pist”:

← **Thread**



C.S. Who Dis?
@doja_bird

...

Somerville Police investigated a 6 yr old Afro-Latino child for touching a white girl's butt but Boston Police refused to investigate my 30+ yr old r*pist. Y'all need to read this shit, then call the mayor bc they playin w/ a Black kid's life: architectureofinjustice.com

Walter Johnson @abufelix12 · Feb 20

My collaborator and comrade Flavia Perea has been through the wars for her son. Just awful. [bostonglobe.com/2021/02/20/met...](https://www.bostonglobe.com/2021/02/20/met...) via @BostonGlobe

9:46 AM · Feb 23, 2021 · Twitter Web App

54. Also or about February 23, 2021, Ms. Legarde published a statement on Twitter falsely referring to Mr. Helali as “my r*pist,” stating, “How many jobs has my r*pist lost out on since I went public?”:



55. On or about March 10, 2021, Ms. Legarde published a statement on Twitter falsely referring to Mr. Helali as “my r*pist”:



56. On or about March 13, 2021, Ms. Legarde published a statement on Twitter falsely referring to Mr. Helali as a “r*pist”:



57. On or about March 26, 2021, Ms. Legarde published a statement on Twitter falsely referring to Mr. Helali as “my r*pist” and “a rapist”:



58. All of Ms. Legarde’s above-quoted statements that Mr. Helali is a rapist and that he raped her are false and defamatory.

59. All of Ms. Legarde’s statements that above-quoted statements that Mr. Helali is a rapist and that he raped her were viewed and read by numerous third parties.

Ms. Legarde’s Numerous Other False and Defamatory Statements Concerning Mr. Helali

60. In addition to her many false and defamatory rape allegations against Mr. Helali, Ms. Legarde has made numerous other false and defamatory statements about him.

61. In December 2018, Ms. Legarde contacted the Title IX office of Dartmouth College, where Mr. Helali was/is a graduate student, and falsely accused him of sexual assault.

62. In a March 25, 2019 statement on Facebook, Ms. Legarde falsely accused Mr. Helali of committing domestic “abuse” and of having a “history of abandoning children.”

63. In the same March 25, 2019 Facebook post, Ms. Legarde falsely accused Mr. Helali of having “stolen funds from the IWW.”

64. In a spring 2019 blog post entitled, “But Who is Christopher J. Helali?”, Ms. Legarde falsely accused Mr. Helali of “theft, duplicity, coercion, violence, character falsehood, and abuse.”

65. In a June 2, 2019 online article entitled, “All the Stars Are Closer: Accountability is Not Optional” in The Socialist, which is the official publication of the Socialist Party USA, Ms. Legarde wrote falsely that “Christopher Helali sexually assaulted me in 2016. . . .”

66. In an online blog post entitled, “Sankofa: Feels Like We Only Go Backwards (2 June 2019),” which Ms. Legarde posted on June 3, 2019 and updated on June 11, 2019, Ms. Legarde falsely accused Mr. Helali of having “coerced” her into having a child and then having “abandon[ed]” that child.

67. In the June 2019 “Sankofa” online blog post, Ms. Legarde falsely accused Mr. Helali of having “skirted the boundaries of consent with my body.”

68. In the June 2019 “Sankofa” online blog post, Ms. Legarde falsely accused Mr. Helali of being a military “deserter.”

69. In the June 2019 “Sankofa” online blog post, Ms. Legarde falsely accused Mr. Helali of “theft” and being a “thief” who “stole from his comrades” and “stole from a comrade.”

70. In the June 2019 “Sankofa” online blog post, Ms. Legarde falsely accused Mr. Helali of financing his educational “studies with stolen funds/labor of comrades.”

71. In the June 2019 “Sankofa” online blog post, Ms. Legarde falsely accused Mr. Helali of having “used stolen funds” to travel to Syria in early 2017.

72. In the June 2019 “Sankofa” online blog post, Ms. Legarde speculated falsely that Mr. Helali “emptied some YPG funds before he left” Syria in September 2017.

73. In the June 2019 “Sankofa” online blog post, Ms. Legarde speculated falsely that Mr. Helali “has stolen from other communities.”

74. On October 9, 2019, in an online blog post entitled, “Christopher Helali Has Such a Victim Complex/Dartmouth Knows (December 2018),” Ms. Legarde falsely accused Mr. Helali of “getting me pregnant intentionally without my consent.”

75. In the same October 9, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of “being dishonorably discharged from the US Military[.]”

76. In reality, Mr. Helali resigned from the U.S. Military on October 13, 2015, and received an honorable discharge on October 14, 2015. See Exhibit J.

77. In the same October 9, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of being a “fucking thief.”

78. In a November 15, 2019 online blog post entitled, “Christopher Helali is a White Man, But Also Hate White People,” Ms. Legarde falsely accused Mr. Helali of “believ[ing] in” an “anti-Semitic conspiracy theory.”

79. In the same November 15, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of “taking things that don’t belong to [him],” including “the funds he’s stolen over the years from others.”

80. In the same November 15, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of “actively reproductively coercing and planning to further sexually exploit me.”

81. In a December 12, 2019 online blog post entitled, “The Boston IWW & Me (Feb/March 2019),” Ms. Legarde falsely accused Mr. Helali of “abandoning [his] kids.”

82. In the same December 12, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of having “stolen” money from the IWW.

83. In the same December 12, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of having engaged in a “2016 theft” from the IWW.

84. In the same December 12, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of being a “thief” who “had stolen money from his comrades.”

85. In the same December 12, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of being a domestic “abuser.”

86. In the same December 12, 2019 online blog post, Ms. Legarde falsely accused Mr. Helali of committing “sexual assault” against her.

87. In a January 10, 2020 online blog post entitled, “75% Off,” Ms. Legarde again falsely accused Mr. Helali of being a domestic “abuser.”

88. In a January 13, 2020 online blog post entitled, “The Others Pt. I (Nov 2019),” Ms. Legarde falsely accused Mr. Helali of “sexually assaulting” her.

89. In the same January 13, 2020 online blog post, Ms. Legarde falsely accused Mr. Helali of having “stolen” between \$10,000 and \$20,000.

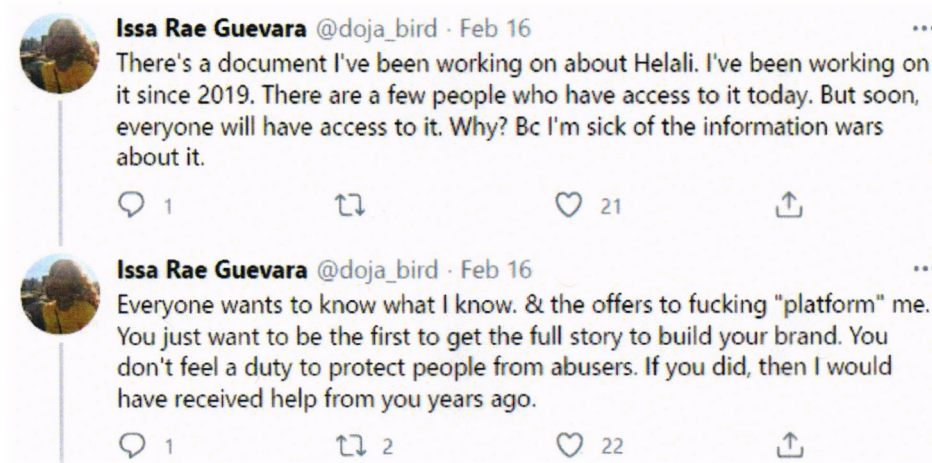
90. In a February 4, 2020 online blog post entitled, “Fake Valley News, or Christopher Helali Is Not A Conscientious Objector (April 2019),” Ms. Legarde falsely accused Mr. Helali of being “my abuser” and she wrote falsely that “he abused me. . . .”

91. In the same February 4, 2020 online blog post, Ms. Legarde falsely accused Mr. Helali of having been “dishonorably discharged from the [U.S.] military,” having been “dishonorably discharge[d] for bad conduct,” and being “dishonorably discharged for whatever domestic violence occurred with his ex-wife in the time leading up to their divorce, for mental health reasons, or perhaps for some good ole war crime-in’ during his service.”

92. In the same February 4, 2020 online blog post, Ms. Legarde falsely accused Mr. Helali of being an “Anti-semite” and of promoting an “anti-Semitic conspiracy theory.”

93. In the same February 4, 2020 online blog post, Ms. Legarde falsely accused Mr. Helali of having “stolen funds” from the IWW.

94. In a February 16, 2021 statement on Twitter, Ms. Legarde refers to Mr. Helali as an “abuser[]”:



95. In a separate February 16, 2021 statement on Twitter, Ms. Legarde refers to Mr. Helali as “my abuser”:



96. All of Ms. Legarde’s statements concerning Mr. Helali described in paragraphs 61 through and including 95, above, are false and defamatory.

97. All of Ms. Legarde’s statements concerning Mr. Helali described in paragraphs 61 through and including 95, above, were viewed and read by numerous third parties.

**Ms. Legarde's False and Defamatory Statements Were Calculated to
Cause Injury to Mr. Helali in Vermont**

98. Ms. Legarde purposely directed the harmful effects of her activities at the State of Vermont in calculated attempts to cause harm to Mr. Helali in the State of Vermont.

99. At all relevant times, Ms. Legarde knew the emotional, reputational, employment and privacy-related tortious injuries she was intentionally causing to Mr. Helali would be felt by him in the State of Vermont.

100. On or about April 17, 2019, Ms. Legarde telephoned Mr. Ernie Kohlsaas, whom she knew to be a resident of Vermont as well as the editor of The Valley News, a seven-day morning daily newspaper based in Lebanon, New Hampshire, covering the Upper Valley region of New Hampshire and Vermont.

101. Ms. Legarde knew at the time that she called Mr. Kohlsaas that Mr. Helali had written for The Valley News.

102. During her call with Mr. Kohlsaas, Ms. Legarde falsely accused Mr. Helali of having been dishonorably discharged from the U.S. Military.

103. During her call with Mr. Kohlsaas, Ms. Legarde falsely accused Mr. Helali of committing sexual assault.

104. During her call with Mr. Kohlsaas, Ms. Legarde falsely accused Mr. Helali of being anti-Semitic.

105. During her call with Mr. Kohlsaas, Ms. Legarde falsely accused Mr. Helali of abusing her.

106. During her call with Mr. Kohlsaas, Ms. Legarde falsely accused Mr. Helali of theft.

107. On or about April 12, 2019, Ms. Legarde emailed Ms. Amanda Wedegis, whom Ms. Legarde knew to be a Vermont resident and the editor of The Vermont Journal, which is based in Ludlow, Vermont.

108. Ms. Legarde knew at the time she sent her email to Ms. Wedegis that Mr. Helali had written for The Vermont Journal.

109. In her correspondence with Ms. Wedegis, Ms. Legarde Ms. Legarde falsely accused Mr. Helali of committing sexual assault.

110. In her correspondence with Ms. Wedegis, Ms. Legarde falsely accused Mr. Helali of being anti-Semitic.

111. In her correspondence with Ms. Wedegis, Ms. Legarde falsely accused Mr. Helali of abusing her.

112. In her correspondence with Ms. Wedegis, Ms. Legarde falsely accused Mr. Helali of theft.

113. Ms. Legarde bragged in a February 4, 2020 online blog post entitled, “Fake Valley News, or Christopher Helali Is Not A Conscientious Objector (April 2019)” that her April 2019 correspondence with Ms. Wedegis convinced Ms. Wedegis to: (A) stop a piece written by Mr. Helali from appearing in the print edition of The Vermont Journal, and (B) pull the same piece from the publication’s website.

114. Ms. Legarde sent a February 20, 2020 email message to Martha Hennessy, whom Ms. Legarde knew to be a Vermont resident, in which Ms. Legarde wrote falsely that Mr. Helali “sexually assaulted me in 2016.”

115. In the same February 24, 2020 email message to Ms. Hennessy, Ms. Legarde falsely accused Mr. Helali of being “dishonorably discharged from his service with the US military. . . .”

116. Aaron Hoopes resides in Vershire, Vermont and has resided there for seventeen years. Mr. Hoopes is the President of the Board of Directors for Vershare, a grassroots organization in Vershire, Vermont.

117. Mr. Hoopes met Mr. Helali when Mr. Helali first came to Vermont. Mr. Helali set up a few movies and talks on behalf of Vershare.

118. In or around February 2020, Ms. Legarde called Mr. Hoopes, whom she knew to be a Vermont resident, to try to convince him to sever professional ties with Mr. Helali.

119. The phone call lasted 10-15 minutes, during which time Ms. Legarde continued to repeat false accusations about Mr. Helali.

120. During her phone call with Mr. Hoopes Ms. Legarde made what Mr. Hoopes later described as “very slanderous accusations” concerning Mr. Helali.

121. Ms. Legarde provided Mr. Hoopes with a website she created that included a series of text messages between Mr. Helali and Ms. Legarde. Mr. Hoopes described the website as an “anti-Chris Helali website.”

122. In February 2020, Mr. Hoopes contacted Mr. Helali to notify him of the conversation he had with Ms. Legarde.

123. In or around June 2020, Ms. Legarde contacted members of the Vermont Progressive Party, specifically Mr. Josh Wronski and Vermont State Senator Anthony Pollina, whom Ms. Legarde knew to be a Vermont residents, and falsely accused Mr. Helali of committing sexual assault.

124. In her communications with Mr. Wronski and Senator Pollina, Ms. Legarde falsely accused Mr. Helali of committing sexual assault.

125. In her communications with Mr. Wronski and Senator Pollina, Ms. Legarde falsely accused Mr. Helali of being anti-Semitic.

126. In her communications with Mr. Wronski and Senator Pollina, Ms. Legarde falsely accused Mr. Helali of abusing her.

127. In her communications with Mr. Wronski and Senator Pollina, Ms. Legarde falsely accused Mr. Helali of theft.

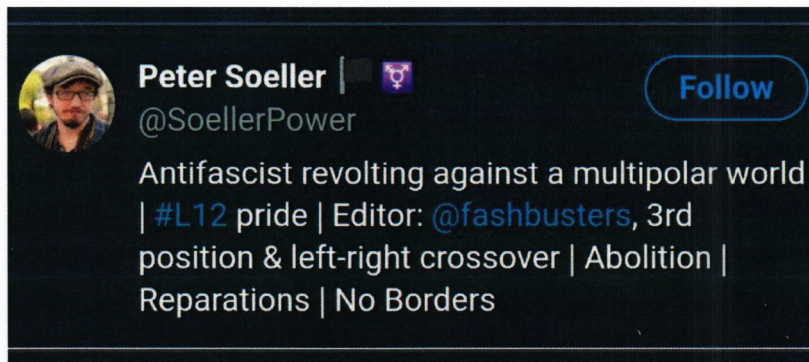
128. All of Ms. Legarde's statements concerning Mr. Helali described in paragraphs 100 through and including 127, above, are false and defamatory.

129. All of Ms. Legarde's statements concerning Mr. Helali described in paragraphs 100 through and including 127, above, were viewed and read by third parties.

**Mr. Soeller Falsely Accuses Mr. Helali of Rape
and Embezzlement on Mr. Soeller's Fashbusters.com Website**

130. Mr. Soeller claims on his website, Fashbusters.wordpress.com, that it is "committed to exposing all forms of fascist creep, oppressive behavior and social institutions and cultural abuse." [fashbusters.com.wordpress.com/about/ (last visited May 25, 2021).]

131. On his Twitter account (@fash_busters), Mr. Soeller identifies himself the "Editor" of Fashbusters.com and as an "Antifascist revolting against a multipolar world":



132. In an online blog post entitled, “Rapist Christopher Helali Who Embezzled Thousands From the IWW Runs For Congress In Vermont” that appears on the Fashbusters website that Mr. Soeller authored and published in September 2020 and updated on February 6, 2021, Mr. Soeller wrote falsely as follows:

UPDATE February 6, 2021: Chris Helali is also a rapist and exploiting the legal process to abuse his ex-partner. Detailed thread here:

133. The underscored text, “Detailed thread here” is a hyperlink that opens up a Twitter thread from February 6, 2021 that begins with the following false and defamatory tweet published by Ms. Legarde:



134. The large-font headline of Mr. Soeller’s online Fashbusters blog post that he authored and published in September 2020 and updated on February 6, 2021 falsely accuses Mr. Helali of being a “Rapist” who also “Embezzled Thousands From The IWW. . . .”

135. In the same online Fashbusters blog post, Mr. Soeller falsely accuses Mr. Helali of having “stole[n] \$4,500 from the Boston Industrial Workers of the World (IWW). . . .”

Mr. Soeller's False and Defamatory Statements Were Calculated to Cause Injury to Mr. Helali in Vermont

136. Mr. Soeller purposely directed the harmful effects of his activities at the State of Vermont in a calculated attempt to cause harm to Mr. Helali in the State of Vermont.

137. At all relevant times, Mr. Soeller knew the emotional, reputational, employment and privacy-related tortious injuries he was intentionally causing to Mr. Helali would be felt by him in the State of Vermont.

138. In a multi-tweet thread on Twitter, with his original tweet posted on September 9, 2020 and his five responsive tweets posted on September 28, 2020, Mr. Soeller used the Fash Busters Twitter account (@fash_busters) to defame Mr. Helali.

139. In the course of his six-tweet thread, Mr. Soeller posted the following tweet:



140. Mr. Soeller's tweet reproduced in the preceding paragraph is significant because Mr. Soeller tagged six Vermont media organizations and two prominent Vermont journalists, thereby directing them to Mr. Soeller's multi-tweet Twitter thread concerning Mr. Helali.

141. Specifically, Mr. Soeller tagged The Valley News (@VNewsUV), Vermont Digger (@vtdigger), Seven Days (@sevendaysvt), the Burlington Free Press (@bfp_news), Vermont Public Radio, also known as VPR (@vprnet), Mr. Bob Kinzel of VPR (@VPRKinzel), Ms. Jane Lindholm of VPR (@JaneLindholm), and the Barre-Montpelier Times-Argus (@TimesArgus).

142. After tagging these Vermont media organizations and Vermont journalists, Mr. Soeller wrote that they should "look into all of this for sure."

143. Mr. Soeller's same Twitter thread containing the tags to the eight Vermont media organizations and Vermont journalists also includes Mr. Soeller's tweet of a weblink to his online Fashbusters blog post that Mr. Soeller authored and published in September 2020 updated on February 6, 2021 to describe Mr. Helali falsely as a "Rapist" who also "Embezzled Thousands From The IWW" and which falsely accuses Mr. Helali of having "stole[n] \$4,500 from the Boston Industrial Workers of the World (IWW). . . .":

[The remainder of this page is intentionally blank.]



144. In short, by tagging eight Vermont media organizations and journalists in the same Twitter thread containing a link to his online blog post describing Mr. Helali falsely as a “Rapist” who also “Embezzled Thousands From The IWW” and which falsely accuses Mr. Helali of having “stole[n] \$4,500 from the Boston Industrial Workers of the World (IWW). . . .”

145. Mr. Soeller expressly aimed his false and defamatory rape, embezzlement and theft allegations into the State of Vermont in order to cause maximum harm to Mr. Helali in Vermont.

146. All of Mr. Soeller’s above-quoted statements accusing Mr. Helali of being a rapist are false and defamatory.

147. All of Mr. Soeller’s above-quoted statements accusing Mr. Helali of being a rapist were viewed and read by numerous third parties.

148. All of Mr. Soeller's above-quoted statements accusing Mr. Helali of being an embezzler are false and defamatory.

149. All of Mr. Soeller's above-quoted statements accusing Mr. Helali of being an embezzler were viewed and read by numerous third parties.

150. All of Mr. Soeller's above-quoted statements accusing Mr. Helali of being a thief are false and defamatory.

151. All of Mr. Soeller's above-quoted statements accusing Mr. Helali of being a thief were viewed and read by numerous third parties.

CLAIMS FOR RELIEF

COUNT I

DEFAMATION PER SE
(FOR PRESUMED, COMPENSATORY AND PUNITIVE
DAMAGES AGAINST DEFENDANT LEGARDE)

152. Mr. Helali repeats and realleges all paragraphs above as if fully set forth herein.

153. Ms. Legarde published statements to third parties that impute to Mr. Helali the commission of criminal offenses.

154. These criminal offenses include rape, sexual abuse, domestic abuse, theft and child neglect and/or abandonment.

155. Ms. Legarde's statements that impute to Mr. Helali the commission of criminal offenses, including rape, sexual abuse, domestic abuse, theft and child neglect and/or abandonment, are defamatory *per se*.

156. Ms. Legarde made her defamatory *per se* statements concerning Mr. Helali knowing they were false or in reckless disregard of whether they were false or not.

157. Ms. Legarde's defamatory *per se* statements concerning Mr. Helali were made with actual malice.

158. Ms. Legarde's defamatory *per se* statements caused Mr. Helali to suffer ongoing impairment of reputation, diminished standing in the community, personal humiliation, injury and embarrassment, emotional distress and mental anguish, and professional and financial harm.

COUNT II

DEFAMATION
(FOR COMPENSATORY AND PUNITIVE
DAMAGES AGAINST DEFENDANT LEGARDE)

159. Mr. Helali repeats and realleges all paragraphs above as if fully set forth herein.

160. Ms. Legarde's statements that Mr. Helali received a dishonorable discharge from the U.S. Military are false and defamatory.

161. Ms. Legarde's statements that Mr. Helali is anti-Semitic and that he believes in and promotes an anti-Semitic conspiracy theory are false and defamatory.

162. To the extent that Ms. Legarde's false and defamatory statements that Mr. Helali abused her are not actionable as defamation *per se*, such statements constitute actionable defamation.

163. To the extent that Ms. Legarde's false and defamatory statements that Mr. Helali neglected and/or abandoned one or more children are not actionable as defamation *per se*, such statements constitute actionable defamation.

164. Ms. Legarde's defamatory statements were made with actual malice.

165. Ms. Legarde's defamatory statements caused Mr. Helali to suffer ongoing impairment of reputation, diminished standing in the community, personal humiliation, injury and embarrassment, emotional distress and mental anguish, and professional and financial harm.

COUNT III

DEFAMATION PER SE
(FOR PRESUMED, COMPENSATORY AND PUNITIVE
DAMAGES AGAINST DEFENDANT SOELLER)

166. Mr. Helali repeats and realleges all paragraphs above as if fully set forth herein.

167. Mr. Soeller published statements to third parties that impute to Mr. Helali the commission of the criminal offenses of rape, embezzlement and theft.

168. Mr. Soeller's statements that impute to Mr. Helali the commission of rape, embezzlement and theft are defamatory *per se*.

169. Mr. Soeller made his defamatory *per se* statements concerning Mr. Helali knowing they were false or in reckless disregard of whether they were false or not.

170. Mr. Soeller's defamatory *per se* statements concerning Mr. Helali were made with actual malice.

171. Mr. Soeller's defamatory *per se* statements caused Mr. Helali to suffer ongoing impairment of reputation, diminished standing in the community, personal humiliation, injury and embarrassment, emotional distress and mental anguish, and professional and financial harm.

WHEREFORE, Christopher Helali requests the following relief:

A. On Count I, presumed damages in an amount to be determined that is greater than \$75,000, compensatory damages in an amount to be determined that is greater than \$75,000, and punitive damages in an amount to be determined that is greater than \$150,000;

B. On Count II, compensatory damages in an amount to be determined that is greater than \$75,000, and punitive damages in an amount to be determined that is greater than \$150,000;

C. On Count III, presumed damages in an amount to be determined that is greater than \$75,000, compensatory damages in an amount to be determined that is greater than \$75,000, and punitive damages in an amount to be determined that is greater than \$150,000;

D. An award of costs and fees as to all Counts; and

E. As to all Counts, such other and further relief that to the Court seems just and proper.

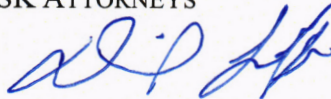
DEMAND FOR A JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff requests a jury trial on all issues so triable.

DATED at Burlington, Vermont this 1st day of June, 2021.

Respectfully submitted,

MSK ATTORNEYS



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