

SUMMONS

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ASTERIOS KOKKINOS

Plaintiff

v.

File No. _____

DICK MASTERSON; DIEGO DIAZ; JORDAN COPE;
RAHM EMMANUEL (in his capacity as mayor of Chicago);
JOHN DOE (Uber Driver); UBER TECHNOLOGIES, INC.;
DARA KHOSROWSHAHI; DONALD TRUMP

Defendants

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer upon the Plaintiff or his representative. If you fail to serve an answer upon plaintiff within thirty (30) days of receiving this summons, judgment will be taken against you by default for the relief demanded in the complaint pursuant to Illinois Rules of Civil Procedure Sec 2-1301.

Dated: December 21, 2017

Chicago, Illinois

REKIETA LAW

/s/

Nicholas Rekieta
Attorney
Rekieta Law
2015 1st St. S. Ste#130
Willmar, MN 56201

COMPLAINT

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ASTERIOS KOKKINOS

Plaintiff

v.

File No. _____

DICK MASTERSON; DIEGO DIAZ; JORDAN COPE;
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DARA KHOSROWSHAHI; DONALD TRUMP

Defendants

Plaintiff Asterios Kokkinos (Plaintiff) by and through his Attorney, Nicholas Rekieta of Rekieta Law, for his complaint alleges and affirms the following under penalty of perjury:

PARTIES

1. Defendant Dick Masterson (Dick) is a host of an internet science podcast called The Dick Show which is a weekly production having global distribution. Dick also is co-founder of a pretend marketing company, a published author, and white house liaison to the small-faced peoples advocacy group.
2. Dick hosted a live show at the Apollo theater (no, not that one) in Chicago on or about December 2, 2017, in which Plaintiff was hired as a contractor to perform comedy in front of a live audience.
3. Dick's primary source of income related to the podcast is through his partnership with Patreon.com.
4. Defendant Diego Diaz (Diego) is a producer of The Dick Show Podcast.

5. Diego's role as producer includes whatever Dick tells him to do including, but not limited to, luggage transportation, Contractor liaison, scheduling, audio production, video production, lighting, and other tasks.
6. Diego was present at the aforementioned live show
7. Defendant Jordan Cope (Cope) is a creator relations specialist at Patreon.com and personal liaison of Dick Masterson.
8. Cope's job duties consist entirely of defending Patreon's interests in fees generated by Dick's usage of Patreon; as such, Dick's promotion of the live show through Patreon.com is an action Cope is required to defend.
9. Defendant Rahm Emmanuel (Mayor) is the duly elected mayor of Chicago, the city hosting the live show.
10. Defendant John Doe is the Uber Driver who billed Plaintiff for transportation during his time in Chicago.
11. Defendant Uber Technologies, Inc. (Uber) is an internet-based taxicab-style car service doing business in and around Chicago.
12. Defendant Dara Khosrowshahi (CEO) is CEO of Uber and all transportation and billing decision of Uber are explicitly and implicitly endorsed by her personally, especially those occurring in the city of Chicago.
13. Defendant Donald Trump (Drumpf) is president of the United States of America and endorses all activity that occurs within its borders.

JURISDICTION

14. Jurisdiction in Cook County court is proper as all of the actions stem from transactions occurring on or about December 1st, 2nd, and 3rd, of 2017 at the aforementioned live show production.

15. Defendants Dick and Diego were present at said live show and in privity with Plaintiff.

16. Defendant Cope is required by employment to endorse and Defend Dick.

17. Defendants Mayor and Drumpf in their roles as government officials have endorsed all transactions occurring within the city of Chicago.

18. Defendants Uber, CEO, and John Doe all directly contributed to the transactions causing this incident.

19. Due to the locus of the transaction in Chicago, Illinois, all defendants have availed themselves of jurisdiction in Cook county court.

FACTS

20. On or about December 2, 2017, Defendants and Plaintiff produced a live production of The Dick Show at the Apollo Theater in Chicago, Illinois.

21. Plaintiff was contracted to perform live comedy at said show.

22. Plaintiff did arrive in Chicago and perform comedy as was required by contract.

23. Plaintiff incurred expenses for meals and transportation during his time in Chicago.

24. Defendant Dick agreed to pay expenses as part of consideration for Plaintiff's performance.

25. Plaintiff provided a reasonable invoice to Dick to recover expenses incurred during the performance of his contractual duties.

26. Dick provided invoice to Diego who, as producer, is required to do all tasks not desirable to Dick.

27. Diego then verified and itemized Plaintiff's invoice.
28. At this point, Defendants' actions turn to the despicable.
29. Defendant Dick and Diego undertook to record false and defamatory statements about Plaintiff.
 30. Defendants Dick and Diego did publish said recording on December 19, 2017 on www.thedickshow.com; importantly not www.dickshow.com.
 31. Beginning approximately 45:30 into the show, Defendants Dick and Diego launch into a vicious campaign of targeted harassment against Plaintiff, making defamatory statements as well as malicious and vile insults.
 32. Defendant Diego intentionally misrepresents events to paint Plaintiff in a negative light.
 33. Specifically, Diego mentions that Plaintiff paid Uber \$86 with a \$27 tip; Diego falsely and maliciously alleges that this is a "50% tip."
 34. In reality, this is a 45.76% tip.
 35. Diego then maliciously and falsely states that he did not believe he was supposed to bring Plaintiff's suitcase to the venue; as stated before, this is a primary job of Diego as part of his producer duties.
 36. In reality, Diego not only knew that as part of his role he should transport Plaintiff's luggage to venue, but Plaintiff even specifically instructed Diego to do so.
 37. Plaintiff Dick proceeds to defame Plaintiff in response to a dispute over a door to his room.
 38. Plaintiff was contractually promised a door and Dick did not deliver said door.

39. Dick, however, using his persona, intentionally misleads his audience into believing that this agreement was not part of the contract and paints Plaintiff as some sort of prima donna.

40. In reality, Plaintiff was merely attempting to assert his contractual rights.

41. These false and defamatory statements have impacted Plaintiff's ability to obtain other contract work.

42. Further, Plaintiff has suffered severe emotional distress at the hands of Defendants Dick and Diego.

CAUSES OF ACTION

43. Plaintiff incorporates all prior statements into these causes of action.

DEFAMATION

44. Defendants, through either direct action or specific endorsement of said actions, did knowingly publish false statements against Plaintiff with intent to harm his personal and professional reputation.

45. As alleged in paragraphs 30 to 41, these statements have caused significant economic loss to Plaintiff.

46. Defamation requires the publication of a statement known or reasonably knowable to be false with the intent to cause harm to one's reputation or person.

47. As demonstrated, Plaintiff has suffered said harm.

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

48. As mentioned, not only did Defendants publish false statements via their podcast show about Plaintiff, they invited Plaintiff onto show for the express purpose of demeaning and belittling him to their audience.
49. Defendants used their knowledge of Plaintiffs personal situations, ethnicity, pending litigation, and stress eating to mock and belittle Plaintiff.
50. Plaintiff has suffered severe emotional harm and is currently seeking counseling due to the direct actions of Defendants.
51. As demonstrated starting at 45:30 on the podcast, Defendants statements are a gross violation of cultural normative communication, and go far beyond any concept of reasonableness.
52. The offensive and vile nature of the actions of Defendants have significantly harmed Plaintiff.
53. Intentional Infliction of Emotional Distress requires an intentional act or action that goes so far beyond normal human decency as to be patently offensive to any reasonable person; this act must further be intended to cause harm; and finally the act must actually cause said harm.
54. By any standard, Defendants' actions were unreasonably offensive.
55. Defendants' actions were intended to, and did, cause severe emotional distress to Plaintiff.
56. Further affiant sayeth naught

PRAYER FOR RELIEF

Plaintiff requests the court order the following:

- 1. Find Defendants guilty of Defamation**

- 2.** Find Defendants guilty of Intentional Infliction of Emotional Distress.
- 3.** Order Defendants to pay damages to Plaintiff in an amount of \$400,000,600.00
- 4.** Order Defendants to pay reasonable attorney fees of \$268,375.00
- 5.** Order Defendants to cease making all statements against Plaintiff
- 6.** Enjoin Defendants from producing their podcast, or any other podcast.
- 7.** Enjoin Defendants from producing live show productions.

SIGNATURES

/s/

Asterios Kokkinos
Plaintiff

/s/

Nicholas Rekieta
Attorney for Plaintiff
Rekieta Law
2015 1st St. S. Ste #130
Willmar, MN 56201