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14 CRAVEN MOOREHEAD and
15 BLACK WINGS MEDIA, INC.

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

19 CRAVEN MOOREHEAD, an individual; and
20 BLACK WINGS MEDIA, INC., a California
corporation,

21 Plaintiffs,

23 vs.

24 ARIA LEE, an individual; and DOES 1-50,
25 inclusive,

26 Defendants.

Case No. **20CHCV00566**

COMPLAINT FOR DAMAGES:
DEFAMATION – LIBEL PER SE

DEMAND FOR JURY TRIAL

FILED
Superior Court of California
County of Los Angeles
SEP 25 2020
Sherril R. Carter, Executive Officer/Clerk of Court
By Shana Marji, Deputy

Individually named parties are fictitious names, yet well-known in the adult entertainment industry. As a matter of courtesy, and to protect the privacy of these parties, real names are not being used at the present time, and will be amended at such time as may be necessary.

COMPLAINT

09/28/20

1 Plaintiffs, CRAVEN MOOREHEAD and BLACK WINGS MEDIA, INC., allege as
2 follows:

3 **THE NATURE OF THIS CASE**

4 1. This case arises out of the intentionally false, malicious, defamatory, and hurtful
5 sexual assault allegations made by defendant, Aria Lee (“Lee” or “Defendant”), a well-known
6 adult film actress, against plaintiff, Craven Moorehead (“Moorehead”) an accomplished and
7 successful adult film director.

8 2. Lee’s defamatory lies were first published in an 8-minute video posted on her
9 Twitter account <@AriaLeexxx> on June 5, 2020 (“Initial Video”). In the video, which has been
10 viewed more than 190,000 times and re-tweeted over 600 times to date, Lee read from an
11 “anonymous letter” containing false and malicious allegations against Moorehead relating to two
12 alleged sexual assault incidents: (a) an alleged incident on October 11, 2019, in which Lee falsely
13 claimed that Moorehead forced her to perform oral sex on him in the bathroom of the set of a
14 pornographic film shoot (“Fabricated October 2019 Incident”); and (b) a second “attack” that
15 allegedly occurred on another film set on December 8, 2019 (“Fabricated December 2019
16 Incident”). (A full transcript of the Initial Video is attached hereto as Exhibit 1).

17 3. Lee’s false and defamatory allegations were full of contradictions, inconsistencies,
18 and outright lies. Shortly after posting the Initial Video, Lee made more false and defamatory
19 statements against Moorehead in an interview published on the Adult Video News (“AVN”)
20 media network, a well-known adult entertainment publication, on June 6, 2020, in an article
21 entitled “Aria Lee Accuses Director Craven Moorehead of Sexual Assault” (the “AVN
22 Interview”). <[https://avn.com/business/articles/legal/aria-lee-accuses-director-craven-moorehead-
23 883471.html](https://avn.com/business/articles/legal/aria-lee-accuses-director-craven-moorehead-883471.html)> (A copy of the AVN Interview is attached hereto as Exhibit 2).

24 4. Lee even told lies in the AVN Interview that contradicted the lies she told in the
25 Initial Video as she altered and embellished significant parts of her story. For example, with
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1 respect to the Fabricated December 2019 Incident, Lee claimed in the AVN Interview that
2 “Moorehead insisted on driving her to the set” and, during the car ride, “he forced my hand on his
3 [penis], and he made me jerk it off[.]” This flatly contradicted her claim in the Initial Video that
4 he had attacked her on a film set and offers no explanation why she asked him for a ride if her
5 allegations of the October 2019 incident were accurate.

6 5. The defamatory lies in the Initial Video and in the AVN Interview were widely
7 disseminated and re-published in numerous other publications. For example, on June 6, 2020, the
8 Naughty News Network published an article entitled “Aria Lee @AriaLeexxx Accuses Craven
9 Moorehead @badboycraven of #Rape” which repeated many of Lee’s false allegations and stated,
10 among other things: “Everyone needs to know because this director [i.e., Moorehead] should not
11 be working”, [Lee] says. . . . His work isn’t that spectacular. It’s not like they couldn’t replace
12 him with ease. . . . Just because she’s a porn star doesn’t mean that you can rape her or force her to
13 do things. NO MEANS NO, EVEN IN PORN!”¹

14
15 6. Lee’s false statements were also republished on June 10, 2020, in an article posted
16 on “Motherboard”, an online magazine and video channel published by Vice Media Group,
17 entitled “A New Wave of Reckoning is Sweeping the Porn Industry”.² They were also
18 republished in an article posted on XBIZ, another adult entertainment industry publication,
19 entitled “Gamma Drops Craven Moorehead Over On-Set Sexual Assault Allegation”.³
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24 ¹ <[http://www.naughtynews.network/aria-lee-arialeexxx-accuses-craven-moorehead-
25 badboycraven-of-rape/](http://www.naughtynews.network/aria-lee-arialeexxx-accuses-craven-moorehead-badboycraven-of-rape/)>

26 ² <[https://www.vice.com/en_us/article/wxqn55/sexual-abuse-allegations-on-porn-sets-ryan-
27 madison](https://www.vice.com/en_us/article/wxqn55/sexual-abuse-allegations-on-porn-sets-ryan-madison)>

28 ³ <[https://www.xbiz.com/news/252670/gamma-drops-craven-moorehead-over-on-set-sexual-
assault-allegation](https://www.xbiz.com/news/252670/gamma-drops-craven-moorehead-over-on-set-sexual-assault-allegation)>

1 7. Lee's false and malicious defamatory allegations severely damaged Moorehead's
2 reputation, caused him to be terminated from his job as a director for Gamma Films Group
3 ("Gamma"), and exposed him to public contempt, ridicule, disgrace, shame, and humiliation.⁴

4 8. Lee's allegations were thoroughly investigated by an independent third-party
5 private investigator hired by Gamma. After a thorough investigation that included multiple
6 witness interviews and a review of surveillance camera footage, the investigator found no
7 physical, circumstantial, or medical proof or any other support whatsoever for Lee's allegations.
8

9 9. While Moorehead believes that every claim of sexual assault should be taken
10 seriously, Moorehead vehemently denies as outlandish, outright fabrications the despicable and
11 implausible allegations that Lee has made against him. Unfortunately, the false statements by Lee,
12 while benefiting herself personally and professionally, will serve to undermine, harm, and sow
13 doubt into other charges of nonconsensual sexual acts and assaults that may be legitimate.
14

15 10. Finally, while Moorehead seeks to 'clear his name' and be fairly compensated for
16 the damages that he and his company have suffered as a result of these malicious lies, it is hoped
17 that this action will also serve to discourage and curtail the publication and re-publication and
18 dissemination of false, hurtful, and damaging allegations on websites and social media platforms
19 without proper vetting, corroboration, and factual investigation.

20 THE PARTIES

21 11. Plaintiff Moorehead is, and at all times relevant hereto has been, an individual
22 residing and doing business in the County of Los Angeles, State of California. He has been a
23 successful award-winning director in the adult film industry for over 23 years.
24

25
26 ⁴ Gamma Films Group is an adult film production company. Upon information and belief, Gamma
27 is a corporation, organized and existing under the laws of Quebec, Canada, with its principal place
28 of business located at 3300 Boulevard Cote-Vertu, Suite 406, Saint-Laurent, Quebec H4R 2B7
and its president is Karl Bernard ("Bernard").

1 12. Plaintiff, Black Wings Media, Inc. ("Black Wings") is, and at all times relevant
2 hereto has been, a corporation organized and existing under the laws of the State of California.
3 Black Wings is managed and controlled by Moorehead.

4 13. Defendant, Lee, upon information and belief, is a twenty-year-old adult film actress
5 who operates and utilizes the Twitter account @AriaLeexxx. She has over 95.4K Twitter
6 followers as well as 81.4K subscribers and 73.2M video views. Lee is, and at all times relevant
7 hereto, has been an individual, believed to reside in, and engaged in conduct causing harm to
8 plaintiffs in, the County of Los Angeles, State of California.
9

10 **FACTS**

11 **A. Lee's False And Defamatory Statements**

12 14. On June 5, 2020, at 4:33 P.M, Lee published the 8-minute long Initial Video on her
13 public Twitter account in a post entitled "Coming out please listen to my story". The video has
14 been viewed over 190,000 times and re-tweeted over 600 times to date.
15

16 15. The Initial Video is replete with contradictions, inconsistencies, and outright lies.
17 Lee has also contradicted her own story in subsequent statements, creating multiple drastically
18 different narratives regarding the alleged incidents.

19 16. In the Initial Video, Lee read from an "anonymous letter" about two wholly
20 fabricated sexual assault incidents. She claimed that the letter was sent to AVN by an
21 "anonymous" person, unknown even to her. However, the letter contained details of events that
22 allegedly happened to Lee, not the "anonymous" sender of the letter, despite Lee's claim in the
23 Initial Video that she had never told anyone about the alleged incidents. Nor does Lee explain
24 how she came into possession of the letter.
25

26 17. Lee appeared to smile and laugh at times in the Initial Video. She stated that
27 "everyone needs to know because this director should not be working" and read from the
28 "anonymous letter" as follows:

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1 There's a cover-up going on at Gamma, porn performer Aria Lee has
2 accused Craven Moorehead of raping her on set on October 11, 2019,
3 forcing her into a bathroom to give him oral sex when he was shooting
4 for Gamma on location with cast and crew in the other room. 'I haven't
5 told anyone about this, um, besides AVN.' . . .with cast and crew in the
6 other room, then came the second attack on December 8th 2019 on
7 another set --dot dot dot-- when she stepped forward to tell her story to
8 Gamma, they did nothing. --dot dot dot-- there has been two other
9 incidents that Craven has [been] accused of assault or rape and the
10 company has done nothing. This hasn't impacted him at all and he is still
11 directing to this day. . . . Gamma hired an independent investigator and
12 he too advised them to release Craven that he was guilty. Aria agreed to
13 take a polygraph test but Craven said he would not. Craven has
14 admitted to multiple people that he did them both. He raped her in a
15 bathroom at the Sunland location on set for Gamma while he was
16 directing.

17
18 18. Shortly after posting the Initial Video, Lee participated in an interview with AVN
19 in which she again accused Moorehead of sexual assault. Her statements were published in the
20 AVN Interview, which was posted on the AVN website on June 6, 2020. (Exhibit 2).

21 19. The allegations in the Initial Video and the AVN Interview are utterly false. First
22 of all, there was no cover-up. Gamma was made aware of Lee's false allegations in or about
23 January 2020. It immediately hired an independent third-party private investigator to investigate
24 the allegations.

25 20. The independent investigator hired by Gamma conducted a thorough investigation
26 that included interviews with multiple witnesses, including the owner of the home where the
27 Fabricated October 2019 Incident allegedly occurred. The homeowner stated that he had reviewed
28 the surveillance video footage of his home for the day in question and saw nothing unprofessional
or inappropriate. There was nothing that supports Lee's wild claims.

29 21. Moreover, there were inconsistencies in Lee's story. With respect to the Fabricated
30 October 2019 Incident, Lee initially accused Moorehead of rape but later claimed that he forced
31 her to perform oral sex. She also initially claimed that the cast and crew were "in the other room"
32 but later claimed that they were all downstairs.

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22. As for the Fabricated December 2019 Incident, Lee claimed in the Initial Video that it happened “on set”. However, in the AVN Interview, she claimed something totally different: that Moorehead had “insisted on driving her to the set” and, during the car ride, forced her hand on his penis and made her “jerk it off”.

23. These allegations are bald lies. On December 8, 2019, when this incident allegedly happened, Moorehead was a camera operator for a horror movie that Lee was cast in. She asked him for a car ride to the set because she did not have a car and was coming from the opposite direction in an Uber car. Nothing untoward occurred during the car ride. In fact, within an hour of the alleged incident, Lee posted this Tweet, encouraging fans to join her “onlyfans” website.

 Aria 51 Inc. BLM
@AriaLeexxx

onlyfans.com/arialeexxx

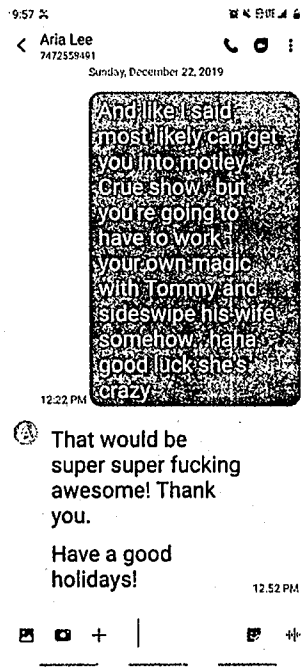


3:17 PM · Dec 8, 2019 · Twitter for iPhone

44 Retweets 1 Quote Tweet 620 Likes

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1 24. Significantly, on December 22, 2019, Lee had a friendly text-message exchange
2 with Moorehead which she ended with “Thank you” and “Have a good holidays!” That is totally
3 at odds with her claim that he had sexually assaulted her just two (2) weeks ago. Below is a
4 screenshot of their text-message exchange:



17 25. Lee’s claim that Moorehead “admitted to multiple people” that he sexually
18 assaulted her is also false. Quite simply, he did not do it and did not admit to doing something he
19 did not do.

20 26. Lee further claimed, falsely, that Moorehead had been accused of assault or rape in
21 two other incidents. That is simply not true. There was no other allegation of assault or rape
22 against Moorehead.

23 27. It appears that Lee had discussed these false allegations with her agent, Sandra
24 McCarthy of OC Modeling, prior to posting the Initial Video, and, as discovery is likely to reveal,
25 her false statements were part of a conspiracy to shake down Gamma.
26

27 28. As noted above, after a thorough investigation, the independent investigator hired
28

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1 by Gamma found no credible support for Lee's allegations.

2 29. On June 6, 2020, the day after Lee posted the false and defamatory Initial Video on
3 her Twitter account, Gamma released the following statement:

4 In January 2020, Gamma Films was made aware of allegations of
5 misconduct by one of our independent third-party producers [i.e.,
6 Moorehead] that may violate our Code of Conduct. In accordance with
7 our usual due process for such allegations, we have performed an
8 independent investigation into these allegations – the conclusion of that
9 investigation was that it has been impossible to validate the veracity of
10 the allegations in question.

11 (emphasis added).

12 **B. Bernard and Gamma's Actions.**

13 30. On or around January 29, 2020, after the investigator had concluded his
14 investigation without finding any credible evidence to support Lee's allegations, Gamma's
15 President Karl Bernard called Moorehead and informed him that he was cleared to return to work
16 immediately.

17 31. Bernard told Moorehead, however, that he must sign a new contract with Gamma
18 before he would be allowed to resume working. The contract already in place at the time required
19 Gamma to pay Moorehead a minimum of twelve (12) guaranteed production days a month at the
20 rate of \$1,000 per day. The new contract that Bernard told Moorehead he had to sign before he
21 could work again reduced the number of guaranteed production days to eight (8). The new
22 contract thus effectively reduced Moorehead's guaranteed salary from \$12,000 a month to \$8,000
23 a month. Essentially, Gamma exploited the situation to coerce Moorehead to sign a new contract
24 with less favorable terms.

25 32. Under duress and having no other choice, Moorehead and Black Wings signed a
26 new "Work For Hire Production Agreement" ("Production Agreement") with Gamma on or about
27 February 11, 2020. Moorehead resumed his directorial work for Gamma shortly thereafter and
28 continued working without incident until Lee posted the Initial Video on June 5, 2020.

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1 33. As noted above, when Lee first posted the Initial Video, Gamma issued a statement
2 in support of Moorehead. In the statement, which was issued on June 6, 2020, Gamma stated that
3 it had performed an independent investigation of Lee's allegations and concluded that it was
4 "impossible to validate the veracity" of those allegations.

5 34. However, just two days after issuing the statement supporting Moorehead, Gamma
6 reversed course. On June 8, 2020, Bernard and Abboud Kassis, an officer/employee of Gamma,
7 called Moorehead and told him that while there was no evidence to corroborate Lee's allegations
8 and they did not believe the allegations, they had decided to terminate him due to prevailing public
9 opinion and all the negative publicity surrounding the allegations. They stated, in sum and
10 substance: "We aren't saying we believe her [Aria Lee] but the public backlash and bad press are
11 going to be too big on this. The risk isn't worth the reward. We are going to exercise our 90-day
12 termination clause in the contract."
13

14 35. During this conversation, Bernard also expressly promised and agreed that he and
15 Gamma would not make any more public statement concerning the matter ("Oral Agreement").
16

17 36. Shortly thereafter, Gamma issued a Termination Notice to Moorehead and Black
18 Wings dated June 8, 2020. The Termination Notice states, among other things:

19 The Parties recognize the inherent obligations of confidentiality which
20 emanates both from the Parties' business relationship and the Producer
21 Agreement (sections 7.3 and 7.6 of the Producer Agreement) and the
22 Parties agree and recognize that the making of any public statements
23 regarding this Termination Notice is contrary to the contractual
24 covenant of good faith embedded in law and in this Termination Notice,
25 and the Producer Agreement.

26 37. Pertinently, Section 7.3 of the Production Agreement provides:

27 The Producer, its Producer Team and [Gamma] mutually agree to
28 forbear from making, causing to be made, publishing, ratifying or
endorsing any and all disparaging remarks, derogatory statements or
commendations made to any party with respect to either of them. Further,
the Parties hereto agree to forbear from making any public or non-
confidential statement with respect to any claims or complaints against
either Party without mutual consent, to be given in advance of any such

statement.

1
2 38. On or about June 9, 2020, Bernard and Gamma made the following public
3 statement to Motherboard, the online magazine and video channel published by Vice Media
4 Group: "Following additional information that was reported to us since our original investigation
5 into Aria Lee's allegations, I have decided on Monday to sever ties with Black Wings Media and
6 its director Craven Moorehead." This statement was false.

7
8 39. These false statements were disseminated by Vice reporter Samantha Cole in a post
9 on her Twitter account on June 9, 2020. It was further disseminated in an article written by Cole
10 that was published on Motherboard on June 10, 2020, entitled "A New Wave of Reckoning is
11 Sweeping the Porn Industry". (A copy of the post by Samantha Cole on her Twitter count on June
12 9, 2020, is attached hereto as Exhibit 3. A copy of the relevant excerpt from the article by Cole
13 published on Motherboard on June 10, 2020, is attached hereto as Exhibit 4).

14
15 40. On June 10, 2020, Bernard and Gamma made a second public statement about the
16 matter to XBIZ: "We will no longer work with Black Wings Media and its director Craven
17 Moorehead when we eventually resume production[.]" This statement was reported in an article
18 by Gustavo Turner published on XBIZ on June 10, 2020, entitled "Gamma Drops Craven
19 Moorehead Over On-Set Sexual Assault Allegation". (A copy of the article by Gustavo Turner
20 published on XBIZ on June 10, 2020, is attached hereto as Exhibit 5).

21
22 41. On June 15, 2020, Bernard and Gamma made yet another public statement about
23 the matter in a public online post to their subscribers which stated, among other things: "I have
24 terminated the agreement with the producer. I have also started constructive discussions with the
25 performer and her agency about the process we followed in January and how to improve that
26 process for the future, and I will ensure these continue to take place." (A copy of the public
27 statement posted by Bernard on June 15, 2020, is attached hereto as Exhibit 6).

28

CAUSE OF ACTION

(Defamation-Libel Per Se)

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42. Plaintiffs hereby repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

43. Lee published or caused to be published the defamatory lies in the Initial Video and in the AVN Interview.

44. Lee published or caused those lies to be published recklessly and maliciously, knowing that they were false, or without having any reasonable basis whatsoever to believe that they were true.

45. Lee's malicious publication of the brazen lies falsely accusing Moorehead of engaging in serious criminal conduct by supposedly sexually assaulting her on two separate occasions were widespread and ubiquitous across the adult film industry, the media, and throughout the United States and the world, causing substantial harm to Moorehead's reputation.

46. By publishing these lies on Twitter, Lee intended that they would be read and re-tweeted and re-posted, and was read and re-tweeted and re-posted, throughout the City and County of Los Angeles and the State of California, where Moorehead has a residence and does business, as well as throughout the world.

47. Among other things, Lee's defamatory lies falsely assert that Plaintiff engaged in illegal criminal conduct. These lies are libelous on their face and clearly exposed Moorehead to hatred, contempt, ridicule, and obloquy and/or caused Moorehead to be shunned or avoided and have a tendency to injure Moorehead in his occupation.

48. The false defamatory lies are reasonably susceptible of a defamatory meaning on their face in that they falsely assert that Moorehead engaged in criminal conduct, and the defamatory lies have a direct tendency to injure Moorehead concerning his professional reputation, character, and business.

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1 49. Lee published or caused the defamatory lies to be published with actual malice with
2 the knowledge that they were false, or with a reckless disregard for the truth.

3 50. Lee intentionally portrayed Moorehead in this manner knowing that the depiction
4 was false, or without any grounds for believing it to be true.

5 51. The defamatory lies disseminated by Lee were unprivileged and were intended by
6 Lee to directly injure Moorehead concerning his professional reputation, character, trade, and
7 business. Lee knew or recklessly disregarded the fact that the defamatory lies would likely
8 damage Moorehead's reputation.
9

10 52. As a direct and proximate result of the above-described conduct by Lee,
11 Moorehead has suffered general and special damages in an amount not presently known, but
12 believed to be not less than ten million dollars (\$10,000,000.00) together with interest, costs, and
13 disbursements. Although the full nature, extent, and amount of these damages are currently
14 unknown, the complaint will be amended at or before trial to include such information if such
15 amendment is deemed necessary by the Court.
16

17 53. In doing the things alleged herein, Lee acted willfully, maliciously, oppressively,
18 and despicably with the full knowledge of the adverse effect of her actions on Moorehead, and
19 with willful and deliberate disregard of the consequences to Moorehead such as to constitute
20 oppression, fraud, and/or malice.

21 54. Moorehead has been injured in his good name, fame, and credit, and brought into
22 public disgrace, ridicule, aversion, and infamy amongst his neighbors, members, and community.
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24 55. By reason thereof, Moorehead is entitled to recover punitive and exemplary
25 damages from Lee in an amount appropriate to punish or set an example of Lee and to deter her
26 from engaging in such conduct in the future.
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PRAYER FOR RELIEF

WHEREFORE, PLAINTIFFS pray for judgment against DEFENDANTS as follows:

1. For an award of general and compensatory damages in a sum not less than \$10,000,000.00, or according to proof at trial;
2. For an award of special and consequential damages according to proof at the time of trial;
3. For an award of pre-judgment interest on all damages at the rate of 10% per annum;
4. For an award of punitive and exemplary damages;
5. For an award of attorney fees;
6. For costs of suit incurred in this action; and
7. For such other and further relief as the Court deems just and proper.

JURY DEMAND

PLAINTIFF hereby demands a trial by jury on all claims and issues which he has a right for a jury to render judgment.

Dated: September 17, 2020

CASTANEDA LAW, APC



Sergio A. Castaneda
Mukund Arun
Attorneys for Plaintiffs

EXHIBIT 1

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ARIA LEE – VIDEO 1 TRANSCRIPTION [JUNE 5, 2020]

[00:00:00] Hey guys. So, um.. I am here to come out about a lot of things that are going on in the industry lately. And, um, I think it's finally time to... sorry. I'm like crying. I think it's finally time for me to share my story and what happened to me. Um, so that's what we're going to do.

[00:00:53] Um, so, this letter *[picks up envelope and holds up to camera, addressee is AVN: Attn Peter Warren, with a Santa Clarita postmark dated February 2020]* was addressed to AVN, um from Santa Clarita, from an anonymous person. I have no idea who sent this letter to them.

[00:01:11] Um, and... Sorry, if I like cry and stuff, um this is just really emotional for me. *[gestures to her cat]* Kitty cat stop baby, please okay, so

[00:01:30] so

[00:01:34] Okay, I'm sorry. *[smiles?]* Not ready to let everyone know about this, but everyone needs to know because this director should not be working. All right, so

[00:01:57] I'm just going to read it to you. *[starts to read letter]*

[00:02:00] "There's a cover-up going on at Gamma, porn performer Aria Lee has accused Craven Moorehead of raping her on set in October 11 2019, forcing her into a bathroom to give him oral sex when he was shooting for gamma on location with cast and crew in the other room.

[00:02:25] I'm sorry. Just give me a minute. I haven't told anyone about this, um, besides AVN. Um, alright, so here.

[00:02:41] With cast and crew in other room, then came the second attack on December 8th 2019 on another set --dot dot dot-- when she stepped forward to tell her story to gamma. They did nothing --dot dot dot-- there has been two other incidents that Craven has been accused of assault or rape and the company has done nothing. This hasn't impacted him at all.

[00:03:08] And he is still directing to this day.

[00:03:17] Um

[00:03:20] There's stuff in there about him, but I'm not going to include that. I'm going to go to the next paragraph now, um...

[00:03:30] Gamma hired an independent investigator and he too advised them to release Craven that he was guilty, Aria agreed to take a poly--a polygraph test. But Craven said he would not.

[00:03:47] Craven has admitted to multiple people that he did them both. He raped her in a bathroom at the Sunland location on set for Gamma while he was directing.
[stops reading, puts letter away]

[00:04:05] This letter was sent to AVN. Um, I didn't want to go public about it. But now I think I definitely should because this guy should not be working and I have, been going through... I have seen so, I have a therapist now that costed a lot of money because of him, um, like, and then gamma just covered it up and just ignored me?! *[wipes "tears" that do not exist]*

[00:04:45] I'm sorry. I'm not trying to get emotional. It's just like, that's not okay. That is not okay at all.

[00:05:01] um, yeah, so if any other girls, I'm going to be writing an article with AVN. Um, so if any girls have had any incidents like this with that director, um, please come forward and tell me because I am writing an article and I would love to hear your side of the story because this should not be happening to us.

[00:05:33] We should not be taken advantage by a director on set, that we, are working, for, we should not. We are supposed to be protected. We're supposed to be taken care of. And the whole crew was downstairs when he did it.

[00:05:54] The whole entire crew. I'm sorry for getting emotional. I--I'm it's just I haven't talked about this.

[00:06:07] *[reads screen, addresses live audience comment?]* Why would I sue AVN, AVN is helping me.

[00:06:15] Um, so yes, please if you have any stories like this with any other directors, even especially this director, please come forward to me. Um, and we can

talk about it. Um... I'm sorry. I'm still a little bit upset that I just had to read that to everyone.

[00:06:39] I love you guys so much. Thank you for being there for me and supporting me. Sorry. My cat is like fucking with everything, as I'm trying to tell real life story. *[smiles]* She's always doing this shit. Um, but yeah.

[00:07:00] Uh, I guess that's all I have to say. I love you guys so much.

[00:07:11] *[reads screen, addresses live audience comment?]* I know she really is *inaudible*.

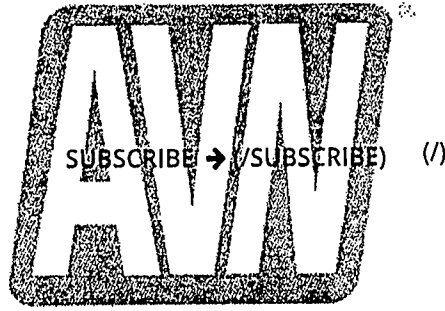
[00:07:17] Um, so yeah, if you guys wanna come forward, that would be greatly appreciated. Um, it's about it. Thank you so much for supporting me.

[00:07:31] *[reads screen, addresses live audience comment?]* Yes. I'm still going to be doing videos. I'm just coming out about.....my rape... that happened on set. So that is what I am coming out about.

[00:07:47] I still go will shoot with companies and I hope that Gamma has something to say about this very soon.

[00:08:00] Um, and that's about it. Thank you so much you guys.

EXHIBIT 2



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Aria Lee Accuses Director Craven Moorehead of Sexual Assault

2 weeks ago
 LEGAL
 (HTTPS://AVN.COM)

June 06, 2020 10:35 AM — Legal (<https://avn.com/business/articles/legal>) - By



(<https://avn.com/porn-stars/Peter-Warren-282542.html>)

Peter Warren (<https://avn.com/porn-stars/Peter-Warren-282542.html>)



09/28/20

CHATSWORTH, Calif.—In a video

(<https://twitter.com/AriaLeexxx/status/1269004422731845632?s=20>) posted to her Twitter page Friday, 2020 AVN Best New Starlet nominee Aria Lee leveled two allegations of sexual assault against Hall of Fame director Craven Moorehead, claiming the assaults occurred in October and December of last year.

The allegations were first brought to AVN's attention in late February by way of an anonymous letter and then confirmed by Lee during a meeting on March 2. However, as Lee explains in Friday's video after reading select passages, at the time, "I didn't want to go public about it."

She continued, "But now, I think I definitely should, because this guy should not be working, and I have been going through ... I have a therapist now that costed a lot of money because of him."

Moorehead had not responded to a request for comment at post time.

The first incident, Lee asserts, took place on October 11 while shooting a scene at a private residence for Gamma Films Group's Pure Taboo banner. In an interview with AVN Friday after posting her video statement on Twitter, Lee described that during a lunch break she asked Moorehead to show her to the bathroom.

"He was like, 'Of course, I'll walk you up there, this place is confusing.' He was being nice. I thought he was being a good director," Lee said Friday. "And he takes me to the bathroom, as I'm closing the door, he rushes in, pushes the door closed, pushes me down to my knees, takes his dick out and then makes me suck his dick. ... And he just walked out and acted like nothing happened."

The second encounter, she claims, occurred on December 8 when Moorehead arranged for her to serve as an extra in a mainstream horror movie directed by musician Glenn Danzig.

Lee alleges that Moorehead insisted on driving her to the set, and during the car ride, "He took one hand off the steering wheel, unbuckled my seatbelt. I said, 'What are you doing?' He said, 'Oh, I'm not doing anything.' And I wish I would have

recorded this, because then this would be actual evidence. But I said, 'What are you doing?'

"He goes, 'Nothing,' unbuckles my seatbelt. I re-buckle my seatbelt, I look at him ... I said, 'What are you doing?' And then he starts to take his dick out, and then he reached for my seatbelt again, and then he undid it again. And then he tried to force me to give him head, and I was like, 'No! No! No! No! No!' I screamed 'No' so many fucking times, to the point where he was like, 'Don't be a sore loser, come on. Don't be a sore loser, just get me off, just do this for me, come on, you know you want to.'

"And I literally sat there," she continued, "he forced my hand on his [penis], and he made me jerk it off, but I was so sad and angry, I didn't even move my arm. He literally did it for himself."

Asked why she would agree to ride in a car with Moorehead after what she claims happened on the Pure Taboo set two months earlier, Lee replied, "Because when I first started working for Craven, when I first joined porn in 2018, I thought that we were friends. Because on set we would play the same music, we'd vibe about the same things. You know, he's really into rock 'n roll, I'm really into rock 'n roll. I thought we were friends.

"I think he took it as I liked him, and I never knew that, so I don't know. I just thought he was doing something nice for me. I'm only 19 ... I made a bad decision."

Lee contends that following the second incident she approached Gamma Films Group through her lawyer about the alleged on-set assault in October.

"At first they made it sound like they were going to fix it and help me," Lee said. "They said they were hiring a private investigator ... and he did a full investigation of the whole thing. I agreed to take a polygraph test, but Craven said he would not. And then Gamma just pretty much let it go."

Gamma Films Group addressed Lee's allegations in a statement that reads in full:

"In January 2020, Gamma Films was made aware of allegations of misconduct by one of our independent third-party producers that may violate our Code of Conduct. In accordance with our usual due process for such situations, we have performed an independent investigation into these allegations - the conclusion of that investigation was that it has been impossible to validate the veracity of the allegations in question.

"We never tolerate misconduct on the part of anyone involved with our production projects, as this violates our Code of Conduct. We always strive to provide an ethical and respectful work environment for anyone involved with our production projects and remain committed in supporting the performers, independent third-party producers, and business partners with whom we have an ongoing business relationship. We strongly encourage all parties to reach out should they ever experience a work environment that undermines their well-being and safety.

"We firmly reiterate that the best course of action for anyone that alleges having been a victim of any sort of misconduct which may qualify as a criminal offence is to immediately bring forward such issues with their local law enforcement service.

"Gamma Films Group"

As to what outcome Lee would like to see result from coming forward about both incidents, she said, "I want Craven to never work in the porn industry again. I want his wife to know what he did to me. I want the entire porn industry to know what he did to me. I am completely messed up in the head because of him. I don't have money to see a therapist, but I'm constantly seeing the therapist because I'm not OK. And I'm paying for that. Craven should be. Or at least Gamma, for letting him still work.

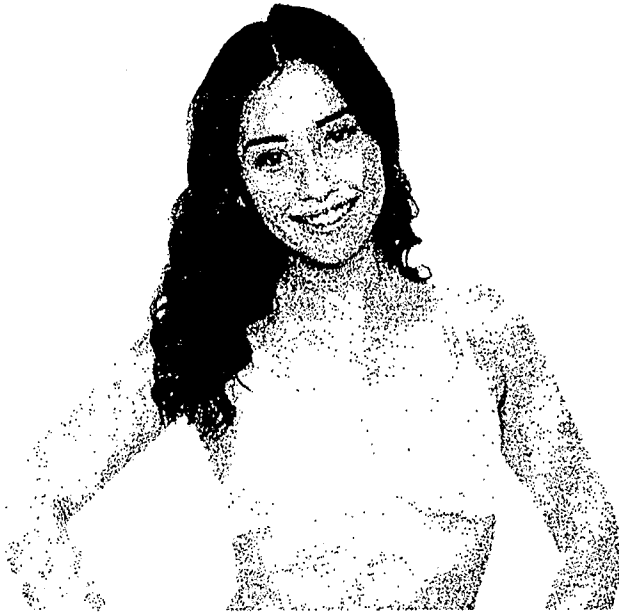
"And I loved Gamma, I loved their companies, I love [chief creative officer] Bree Mills, I wanted to work with them. But they just blew me off like I was nothing."

Lee added, "I just really want other girls to come forward, too, I want to know if this has happened to anybody else. I want us to protect our industry."

Photo of Aria Lee by Keith Ryan

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FSC: Date for Guidelines on Resuming Production Coming Next Week

2 weeks ago
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09/28/20

EXHIBIT 3

ha Cole on Twitter: "President of Gamma Films Group Karl Bernard just announced: "Following additional informati



Samantha Cole

President of Gamma Films Group Karl Bernard just announced:

"Following additional information that was reported to us since our original investigation into Aria Lee's allegation, I have decided on Monday to sever ties with Black Wings Media and its director Craven Moorehead."

2:01 PM · Jun 9, 2020 · TweetDeck

14 Retweets · 30 Likes



Samantha Cole @samleecole · Jun 9

Replying to @samleecole

context:

EXHIBIT 4

09/28/20



09/28/20 SCREENSHOT FROM "NIGHT OUT WITH KINSLEY KARTER"

PHOTO
MARKED FOR SCANNING

MOTHERBOARD
TECH BY VICE

Kelly Madison Media, which owns Porn Fidelity and Teen Fidelity, did not respond multiple requests for comment on the allegations brought forward in this story, but a Kelly Madison Media company representative told XBIZ that "Our company takes any allegation of physical, emotional, mental or sexual abuse against any female talent seriously." But in the same statement, Kelly Madison Media called the allegations from performer Annabel Reed false.

"2020 is fucking kicking people's ass and it's time to get some things straight and fixed."

Ryan Madison, whose Pornhub channel videos alone have more than 46 million views and has acted and directed in hundreds of videos and won multiple Adult Video Network awards, is one of several male performers and directors who have been publicly accused of misconduct on social media in recent weeks. In the past week alone, people within the industry have come out with allegations against several directors and male performers, including but not limited to:

- Performer Aria Lee said that award-winning director Craven Moorehead assaulted her twice last year, once while shooting a scene for Pure Taboo, owned by a Gamma Films Group and again on another occasion off-set. On June 6, Gamma responded with a statement saying that an investigation showed "it has been impossible to validate the veracity of the allegations in question," and suggested anyone with allegations of abuse to call the police. But on Tuesday, Karl Bernard, president of Gamma Films Group, said in a statement to Motherboard that he decided on Monday to "sever ties with Black Wings Media and its director Craven Moorehead."

EXHIBIT 5

09/28/20



Gamma Drops Craven Moorehead Over On-Set Sexual Assault Allegation

Gustavo Turner

Jun 10, 2020 10:17 AM PDT

LOS ANGELES — Gamma Films Group has announced they have parted ways with a third-party contracted director, Craven Moorehead, after a performer released a video last Friday alleging a sexual assault on one of the company's sets.

"We will no longer work with Black Wings Media and its director Craven Moorehead when we eventually resume production," Karl Bernard, president of Gamma Films Group told XBIZ today.

On June 5, performer Aria Lee released a video via Twitter with the caption "Coming out please listen to my story." In the video, Lee reads an anonymous letter sent to another adult industry trade publication alleging "a coverup going on at Gamma" regarding "porn performer Aria Lee" having "accused Craven Moorehead of raping her on set, [on] October 11, 2019."

The anonymous letter read by Lee alleges the Moorehead forced Lee into a bathroom "to give him oral sex" during a Gamma shoot.

Later that day, the adult industry trade publication in question published an interview with Lee, reportedly done after the release of the video, where Lee gave a first-person account of the incident.

Lee told the reporter that during a lunch break, she asked Moorehead to show her the bathroom and then "he was like, 'Of course, I'll walk you up there, this place is confusing.' He was being nice. I thought he was being a good director. And he takes me to the bathroom, as I'm closing the door, he rushes in, pushes the door closed, pushes me down to my knees, takes his dick out and then makes me suck his dick — and he just walked out and acted like nothing happened."

During the interview, Lee also alleged a second sexual assault two months later when Moorehead cast her as an extra in a music video.

After the second incident, in January 2020, Lee contacted Gamma Films Group through a lawyer about the October on-set assault allegation.

"They said they were hiring a private investigator," Lee told the reporter, "and he did a full investigation of the whole thing. I agreed to take a polygraph test, but Craven said he would not. And then Gamma just pretty much let it go."

09/28/20

On Friday, Gamma confirmed that the company was “made aware of allegations of misconduct by one of our independent third-party producers that may violate our Code of Conduct. In accordance with our usual due process for such situations, we have performed an independent investigation into these allegations — the conclusion of that investigation was that it has been impossible to validate the veracity of the allegations in question.”

“We never tolerate misconduct on the part of anyone involved with our production projects, as this violates our Code of Conduct,” the Gamma statement added.

Sometime between Friday and today, Gamma’s president Karl Bernard officially confirmed to XBIZ, they decided to part ways with Moorehead and his third-party production company.

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EXHIBIT 6

09/28/20



Booster Posts: 123 Admin

Dear Subscribers,

For those of you who don't know me, my name is Karl Bernard and I'm the president of Gamma Films Group and Adult Time. Without question, I want it to be known that what has transpired has pained me tremendously. I've always tried to show leadership and aim to raise the bar within the industry. I care tremendously about performers and their safety.

I have terminated the agreement with the producer. I have also started constructive discussions with the performer and her agency about the process we followed in January and how to improve that process for the future, and I will ensure these continue to take place.

Many of you have asked what concrete steps we will be taking to better ensure our productions promote safety and respect for those on set. I am in the process of bringing a new Talent Liaison into the company, whose role will be to discuss with talent their time on our producer's sets following every production day. During that touchpoint, the performers will be questioned on how they were managed on set.

Our efforts will also continue to support industry groups whose work continues to bring change, groups like APAC, the FSC and Pineapple Support. We want to help make it a space that people feel proud to be a part of, whether as a performer, a producer, or a customer.

I am here to tell you that as a subscriber to Adult Time, you have my commitment to create a better working environment for all.

Karl Bernard
President