

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Holly Fujie

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7 Attorneys for Plaintiff,  
8 [REDACTED] A/K/A PRINCE YAHSHUA

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF LOS ANGELES**  
11 **(Central District – Stanly Mosk)**

12 [REDACTED] A/K/A PRINCE  
13 YAHSHUA, an individual,

14 Plaintiff,

15 vs.

16 HUSSIE MODELS, LLC; RILEY  
17 REYNOLDS; and DOES 1-10, inclusive,

18 Defendants.

19 **CASE NO. 22STCV11003**

20 **COMPLAINT FOR:**

- 21 **1. DEFAMATION;**
- 22 **2. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE.**

23 **JURY TRIAL DEMANDED**

24 Plaintiff [REDACTED] a/k/a Prince Yahshua, on information and belief, states as  
25 follows for his complaint:

26 **FACTS COMMON TO ALL CAUSES OF ACTION**

27 1. Plaintiff brings this action against defendants Riley Reynolds and his agency,  
28 Hussie Models, LLC for defamation and intentional interference with prospective economic  
advantage.

2. Specifically, Defendants engaged in a laundry list of lies and  
misrepresentations—essentially tell telling entire adult entertainment industry that Plaintiff

1 is a forger (falsified documents), engaged in bribery (paid cash for an outcome) and has a  
2 loathsome disease (tested positive for an illness). Defendants told third parties:

- 3 • That Plaintiff “sent her [one of Defendants; models] an altered test . . .”
- 4 • Plaintiff “pa[id] her [Defendants’] \$300 cash for antibiotics.”
- 5 • That Plaintiff tested positive for STDs.
- 6 • That Plaintiff was banned from one of the largest testing centers (Talent  
7 Testing Services)—and indeed, due to the false and defamatory  
8 statements, Plaintiff was banned by them.

9 3. As a result of Defendants’ wrongful acts and omissions, and each of them,  
10 Plaintiff has suffered substantial damages, including economic harm (past and future  
11 income), severe emotional distress, humiliation, anxiety, worriedness and loss of sleep, all  
12 in in an amount to be determined at trial, but believed to be in excess of \$250,000. In  
13 addition, Defendants are liable for punitive damages based upon their acts of malice,  
14 oppression and fraud as those words are used and defined in Civil Code § 3294.

#### 15 **PARTIES**

16 4. Plaintiff [REDACTED] a/k/a Prince Yahshua is an individual and a resident  
17 of Nevada.

18 5. Defendant Riley Reynolds is an individual and a resident of Florida.

19 6. Defendants Hussie Models, LLC is a California Limited Liability Company.  
20 At all times relevant, Reynolds was owner, officer and/or managing agent of Hussie  
21 Models. Reynolds was doing business as Hussie Models and Hussie Models are an alter  
22 ego of Hill in that there is such a unity of interest between Hussie Models and Reynolds  
23 that they are indistinguishable from one another. At all times, Reynolds formulated,  
24 directed, controlled, had the authority to control, and/or participated in the acts and  
25 practices set forth in this complaint and received a direct financial benefit from them. As  
26 such, an inequitable result would occur if Reynolds and Hussie Models are not treated as  
27 one and the same.

1           7. Defendants DOES 1 through 10, inclusive, are sued herein under fictitious  
2 names. Their true names and capacities are unknown to Plaintiff at this time. When their  
3 true names and capacities are ascertained, Plaintiff will amend this complaint by inserting  
4 their true names and capacities herein. Plaintiff is informed and believes and thereon  
5 alleges that each of the fictitiously named Defendants is responsible in some manner for the  
6 occurrences herein alleged, and that Plaintiff's damages as herein alleged were proximately  
7 caused by those Defendants. Each reference in this complaint to "defendants,"  
8 "Defendant," or a specifically named defendant refers also to all Defendants sued under  
9 fictitious names.

10           8. Plaintiff is informed and believes and thereon alleges that each of the  
11 defendants designated herein as DOE took part in and participated with Defendants in all  
12 matters referred to herein and was in some manner responsible for the injuries and losses  
13 suffered by Plaintiff.

14           9. Plaintiff is informed and believes and thereon alleges that at all times herein  
15 mentioned each of the Defendants was the agent, servant and/or employee or occupied  
16 other relationships with each of the other named Defendants and at all times herein  
17 mentioned acted within the course and scope of said agency and/or employment and/or  
18 other relationship and each other Defendant has ratified, consented to, and approved the  
19 acts of his agents, employees, and representatives, and that each actively participated in,  
20 aided and abetted, or assisted one another in the commission of the wrongdoing alleged in  
21 this Complaint.

#### **JURISDICTION AND VENUE**

22  
23           10. This Court has jurisdiction over the action under Article 6, Section 10 of the  
24 California Constitution, and Section 410.10 of the California Code of Civil Procedure. This  
25 Court has personal jurisdiction over the parties because Plaintiff submits to the jurisdiction  
26 of the Court and Defendants reside in the County of Los Angeles and the State of  
27 California.

1           11. Venue is proper within this judicial district under Section 395 of the  
2 California Code of Civil Procedure because a substantial part of the acts, conduct, events or  
3 omissions occurred within the State of California, within Los Angeles County, and because  
4 the theft and fraudulent conduct occurred in Los Angeles County and the State of  
5 California.

6   **FIRST CAUSE OF ACTION**

7   **DEFAMATION**

8   **(Against All Defendants)**

9           12. The preceding paragraphs of this Complaint are realleged and incorporated by  
10 reference.

11           13. On or about February 4, 2022, Defendants (via Reynolds) published false  
12 statements to numerous third parties concerning Plaintiff's profession, reputation and  
13 character and accused the same of crimes and an illness (forgery, bribery and loathsome  
14 disease).

15           14. Said rumors and false statements were understood by the individuals who  
16 heard and read them.

17           15. Said rumors and false statements directly impugned Plaintiff's character,  
18 calling him a criminal (that he is a forger and briber) and had a loathsome disease.

19           16. Said rumors and false statements were made with actual malice. Defendants  
20 intended to vex, annoy and humiliate Plaintiff as described more fully above.

21           17. Defendants' defamatory statements, as alleged herein, were defamatory *per*  
22 *se* because they tend, among other things, to state and imply that Plaintiff was engaging in  
23 unlawful conduct and harm Plaintiff in his business and that he engaged in crimes and has a  
24 loathsome disease.

25           18. As a proximate result of Defendants' defamation, Plaintiff has suffered  
26 special damages, including, but not limited to, loss of income and employment-related  
27 opportunities, severe emotional distress and mental anguish, physical distress and  
28 humiliation, all in a sum to be proven at trial.



1           24. Plaintiff is also entitled to exemplary and/or punitive damages as a result of  
2 acts and omissions by Defendants which were malicious, fraudulent and/or oppressive in  
3 nature as those words are defined in Civil Code § 3294

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests that the Court enter an order or judgment against  
the Defendants as follows:

- a. On every Cause of Action:
  - i. Compensatory damages in the amount of \$250,000;
  - ii. Award of punitive damages no less than \$1,000,000.00.
  - iii. Pre and post judgment interest at the legal rate;
  - iv. Such other and further relief as the Court may deem just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury in this action.

DATED: March 30, 2022

SINA LAW GROUP

By           /s/ Reza Sina            
REZA SINA  
Attorneys for Plaintiff