

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

GAMMA MEDIA HOLDINGS, LLC,

Index No.

Plaintiff,

SUMMONS

-against-

DOES 1-100, inclusive,

Defendants.

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your answer, or if the Complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff’s attorney within 20 days after service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York), and in case of your failure to appear or answer, judgment will be taken against you by default for relief demanded in the Complaint.

Plaintiff designates New York County as the place for trial.

The basis for venue designated in this action is CPLR § 503 because Plaintiff transacts substantial business in New York County and the tortious acts caused injury in this County.

Respectfully submitted,

Dated: May 26, 2026
Los Angeles, CA

LINER FREEDMAN TAITELMAN + COOLEY, LLP

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Attorneys for Plaintiff Gamma Media Holdings, LLC

TO: DOES 1-100, inclusive

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

GAMMA MEDIA HOLDINGS, LLC,

Index No.

Plaintiff,

COMPLAINT

-against-

JURY TRIAL DEMANDED

DOES 1-100, inclusive,

Defendants.

Plaintiff Gamma Media Holdings, LLC (“Gamma” or “Plaintiff”), by and through its undersigned counsel, for its complaint against the unnamed DOES 1-100 (the “Doe Defendants”), inclusive, hereby alleges as follows:

NATURE OF THE ACTION

1. Increasingly, musical artists and record labels have been subjected to digital stalking, harassment campaigns, and organized libelous attacks across various online platforms. Artists and labels subjected to such anonymous defamatory campaigns have suffered significant financial, reputational, and emotional harm. Enough is enough.

2. This is an action to identify and hold accountable the anonymous individual or individuals responsible for one such coordinated, malicious, and ongoing campaign targeting Gamma and its business operations, its co-founder and Chief Executive Officer, Lawrence (Larry) Jackson, and its artists.

3. On or about April 23, 2026, just after Bloomberg published a positive and factually-grounded story¹ concerning Gamma and Mr. Jackson, one or more unknown persons launched

¹ Lucas Shaw, *Ye’s Risky Comeback Is Being Championed by This Music Executive*, BLOOMBERG (Apr. 21, 2026), <https://www.bloomberg.com/news/articles/2026-04-21/larry-jackson-is-willing-to-take-a-bet-on-ye-s-controversial-comeback>.

websites at the domains “larryjacksonexposed.com” and “gammaexposed.com” (the “Websites”) and initiated a coordinated social media amplification campaign designed to disseminate false, defamatory, and commercially harmful statements about them to the music industry and the public at large.

4. The perpetrators employed a coordinated network of bot accounts on the social media platform X (formerly Twitter) and Reddit to artificially amplify the defamatory content, making the campaign appear organic when in fact it was orchestrated by a single actor or group of actors working in concert.

5. Gamma seeks to identify the true names and identities of the persons behind this campaign. Gamma therefore brings this action pursuant to CPLR § 1024 against the Doe Defendants to unmask the perpetrators and hold them accountable.

6. Gamma also brings this action to protect its artists and its staff, who are directly within the blast radius of this coordinated attack. The false statements and narratives are designed to destabilize Gamma’s relationships with its recording artists, employees, and business partners—all of whom have been subjected to reputational harm and professional uncertainty through no fault of their own.

7. Gamma and its artists are being subjected to a new and insidious form of corporate interference and harassment, unique to the social media and artificial intelligence age, in which anonymous actors deploy bot networks to astroturf a false narrative into the public consciousness without even a semblance of truth or accountability. Gamma has no choice but to fight back, not only for itself but also for its investors, business partners, employees, and artists, against those who would weaponize technology to destroy reputations and livelihoods behind a veil of anonymity.

PARTIES

8. Plaintiff Gamma Media Holdings, LLC is a Delaware limited liability company engaged in the business of music recording, distribution, and related entertainment services. Gamma maintains substantial business operations in the State of New York, enters into contracts governed by New York law, and conducts business with partners and industry participants located in New York County.

9. Defendants Does 1 through 100 are the persons or entities whose true names and identities are presently unknown to Gamma and who are responsible for the creation, publication, and dissemination of the Websites and the coordinated social media campaign described herein. Gamma designates these Defendants as “Does” pursuant to CPLR § 1024 because, despite diligent efforts to ascertain their identities, Gamma has been unable to determine the true names and identities of the individuals responsible for the tortious conduct alleged herein. When the identities of the Doe Defendants are ascertained, Gamma will seek leave to amend this Complaint to substitute their true names.

JURISDICTION AND VENUE

10. This Court has jurisdiction over this action pursuant to CPLR § 301 and § 302 because the Doe Defendants committed tortious acts causing injury within the State of New York to a company that transacts business in New York and whose principal business relationships are governed by contracts entered into in and subject to the laws of New York.

11. The defamatory and tortious conduct complained of herein was directed at Gamma’s business relationships and reputation in New York, was disseminated to Gamma’s New York-based business partners and industry contacts, and has caused and continues to cause harm in New York.

12. Venue is proper in the County of New York pursuant to CPLR § 503 because Gamma transacts substantial business in New York County and the tortious acts caused injury in this County.

FACTUAL BACKGROUND

Gamma and Its Business

13. Gamma is a music company co-founded and led by Larry Jackson, its CEO. Gamma is engaged in the business of artist development, music recording, music distribution and related technology, marketing, and entertainment services.

14. Gamma maintains significant business relationships throughout the music industry, including partnerships with record labels, recording artists, distributors, and other entertainment companies. These relationships are vital to Gamma's continued success and generate substantial revenue for the company.

15. Gamma's business agreements involve substantial financial commitments. Gamma manages millions of dollars in artist advances, overhead payments, and marketing expenditures annually.

The Anonymous Campaign

16. On or about April 23, 2026, one or more of the Doe Defendants launched the Websites under the domain names "larryjacksonexposed.com" and "gammaexposed.com" through means designed to conceal the registrant's true identity and location.

17. The Websites were placed behind a content delivery network, which masks the true hosting origin server IP address and prevents identification of the Websites' operator through standard technical means.

18. The Websites were fully formed on their launch day and appear to have been built using an AI-powered content platform.

19. The Websites publish false, misleading, and defamatory statements concerning Gamma and Mr. Jackson and present those statements in a manner calculated to damage Gamma's reputation, business relationships, and goodwill in the music industry. Among other things, the Websites contain the following specific false and defamatory statements:

- a. The Websites falsely state that Gamma engaged in "billboard bot fraud" and that Gamma's reported sales figures for the album BULLY by the recording artist Kanye West were artificially inflated through the use of bot-generated purchases, claiming: "BILLBOARD FINAL NUMBERS: Kanye 159k total, only 46k physical. Scamma and Yeezy promises of more units were fake sales that got removed by billboard." The Websites further state: "Looks like the last minute billboard bot fraud plan didn't work. Ye did higher numbers releasing independently."
- b. The Websites falsely state that Gamma "is running out of money" and that Mr. Jackson "is down to his last 10m of the 100m he raised," and further accuse Mr. Jackson of "embezzling investor funds for private flights, grandiose lifestyle, personal PR and legacy artist signings to enhance image and status." These statements falsely impute financial mismanagement, insolvency, and criminal embezzlement to Gamma and Mr. Jackson.
- c. The Websites falsely state that Mr. Jackson "lied" to Gamma's staff about a contractual provision with Kanye West, claiming that Mr. Jackson told employees he had "signed an agreement that [Kanye West] would be dropped if he had any racist or antisemitic outburst" but that "[w]hen his contract got uploaded to company files they found out he lied to them." This statement falsely imputes dishonesty and deception in Mr. Jackson's management of Gamma.
- d. The Websites refer to Mr. Jackson as "Larry Scammson" and to Gamma as "SCAMMA" throughout, framing the entirety of Gamma's business as a fraudulent enterprise.
- e. The Websites falsely state that Mr. Jackson "paid for a Billboard front cover claiming he raised \$1 billion" and imply that Gamma had instead raised \$100 million and burned through \$90 million "with nothing to show for it."
- f. The Websites falsely state that Gamma was "laundering" Mariah Carey's money and inflating her album's first-week numbers to "make Gamma's accounting and investor reports look healthier than they actually were" and that Ms. Carey had "already left" Gamma and had made a "Quiet Exit."
- g. The Websites falsely state that Usher was "[g]one" from Gamma after one project and had made a "Quiet Exit."

20. Each of the foregoing statements published on the Websites is false. On information and belief, the Doe Defendants knew the statements were false at the time of publication or acted with reckless disregard for their truth or falsity.

The Coordinated Social Media Amplification Campaign

21. On or about April 23, 2026, a social media account on X (formerly Twitter) using the handle @johnsonjanine5 published the first post referencing and promoting the Websites. On the same date, a verified X account using the handle @Iamdory1 (associated with the name “ELANA_FX”) also posted content promoting the Websites and placed the Websites’ domains in its account bio, with over fifty percent (50%) of the account’s posts consisting of content targeting Mr. Jackson.

22. On or about April 25–26, 2026, a coordinated bot network consisting of hundreds of X accounts—all created in December 2025 and having zero other activity—posted links to or reposts of the Websites’ content within a twelve-minute window. These accounts include, among many others: @Lilli1893505, @Henka486027, @Misha1115904, @Tamarah685597, @Kettie18355, @Bryna2385040384, @Chloris885471, @Kristin99182662, @Peggi1496630, @Sybyl290582, @Sherri1031659, and @Luci1535849.

23. In addition, a Reddit account using the handle “Judith_Ackee” was identified as posting identical language to that found on the Websites. That account has since been banned by Reddit.

24. A further X account using the handle @jedane9129 was also identified in connection with the campaign but has since been deleted.

Media Coverage and Industry Dissemination

25. On or about May 7, 2026, the celebrity news outlet Page Six published an article entitled “Mystery of anonymous industry figure behind sinister smear campaign against super

agent Ari Emanuel,” which discussed the LarryJacksonExposed website and noted that it “took aim at Gamma co-founder and CEO Larry Jackson.” The article further reported that the Websites had been “passed around the music industry’s C-suites” during that week.

Harm to Gamma

26. This reputational warfare has caused and continues to cause substantial harm to Gamma, including but not limited to: (i) damage to Gamma’s reputation and goodwill in the music and entertainment industry; (ii) damage to Gamma’s existing and prospective business relationships with recording artists, labels, and other industry participants; (iii) interference with Gamma’s contractual relationships and reasonable business expectancies; (iv) loss of revenue, business opportunities, and competitive advantage; and (v) the costs of investigation, security measures, and legal action necessitated by the campaign.

27. The harm is ongoing because the Websites remain accessible and the defamatory content continues to be disseminated.

Gamma’s Diligent Efforts to Identify the Doe Defendants

28. Gamma has conducted a thorough investigation into the campaign and identified the technical infrastructure of the Websites and the social media accounts involved in the amplification campaign. However, Gamma has been unable to determine the identity of the person or persons who created the Websites without legal process.

29. The coordinated bot network suggests either that the Doe Defendants possess the technical capability to deploy social media bot campaigns and/or that they utilized a commercial platform with social amplification features built in.

FIRST CAUSE OF ACTION **(Defamation / Defamation Per Se Against DOES 1-100)**

30. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

31. The Doe Defendants published false statements of fact on the Websites and through the social media accounts described above concerning Gamma and its CEO, Larry Jackson, including but not limited to the specific false and defamatory statements set forth in paragraphs 19(a) through 19(g) above.

32. The defamatory statements were published to third parties, including music industry executives, business partners, media outlets, and the general public.

33. The statements are defamatory per se because they tend to injure Gamma in its trade, business, and profession by, among other things: (i) imputing the commission of serious crimes; (ii) imputing misconduct, dishonesty, and unfitness in the conduct of Gamma's business, including false accusations of lying to employees, blocking artists from better opportunities, and paying for false press coverage; (iii) tending to injure Gamma in its trade and profession by characterizing the entirety of Gamma's business as a fraudulent scheme called "SCAMMA"; and (iv) exposing Mr. Jackson to public contempt and ridicule through, among other things, false allegations concerning his personal life and business practices.

34. The defamatory statements were made with actual malice—that is, with knowledge of their falsity or with reckless disregard for their truth or falsity—or alternatively, with negligence as to their truth or falsity.

35. As a direct and proximate result of the Doe Defendants' defamatory statements, Gamma has suffered and continues to suffer damages, including harm to its reputation, loss of business relationships, loss of revenue, and other compensatory damages in an amount to be determined at trial.

SECOND CAUSE OF ACTION
(Trade Libel / Injurious Falsehood Against DOES 1-100)

36. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

37. The Doe Defendants published false statements disparaging the quality of Gamma's business, its business practices, and the integrity of its operations, including but not limited to the specific false and defamatory statements set forth in paragraphs 19(a) through 19(g) above.

38. The Doe Defendants made such statements with knowledge of their falsity, or with reckless disregard for their truth or falsity, and with the intent to cause harm to Gamma's business.

39. The false statements were directed at Gamma's business operations and are of the type calculated to prevent existing and prospective business partners—including recording artists, music labels, distributors, investors, and other entertainment industry participants—from continuing or entering into business relationships with Gamma. The statements are particularly injurious because they impugn the core of Gamma's business, including its financial integrity, its treatment of artist clients, and its sales and distribution practices.

40. As a direct and proximate result of the Doe Defendants' injurious falsehoods, Gamma has suffered and continues to suffer special damages, including the loss of specifically identifiable business relationships, revenue, and opportunities, in an amount to be determined at trial.

THIRD CAUSE OF ACTION

(Unfair Competition Under New York Common Law Against DOES 1-100)

41. Plaintiff repeats and realleges each and every allegation set forth above as if fully set forth herein.

42. The Doe Defendants engaged in unfair competition by conducting a coordinated campaign of deception, misrepresentation, and commercial misconduct directed at Gamma's business and competitive position in the music industry. The nature and type of information published on the Websites indicate that the Doe Defendants are persons seeking to gain a

competitive advantage in the entertainment marketplace by destroying Gamma's reputation and diverting its business relationships to rival companies.

43. The Doe Defendants' conduct constitutes unfair competition because it involves false statements designed to divert business away from Gamma and injure its competitive position in the music industry, creating the false impression that Gamma is an insolvent, fraudulent enterprise unworthy of industry trust.

44. The Doe Defendants' conduct was undertaken in bad faith and for the purpose of causing commercial harm to Gamma. The coordinated and systematic nature of the campaign demonstrates that the Doe Defendants acted with the specific intent to destroy Gamma's competitive position and commercial reputation in the music industry for the benefit of themselves or others.

45. As a direct and proximate result of the Doe Defendants' unfair competition, Gamma has suffered and continues to suffer damages in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment in its favor and against the Doe Defendants, and each of them, as follows:

1. For compensatory damages in an amount to be determined at trial for injury to Plaintiff's reputation, loss of business relationships, lost revenue, and other harm caused by Defendants' tortious conduct;
2. Punitive damages in an amount sufficient to punish Defendants for their willful, malicious, and outrageous conduct and to deter similar conduct in the future;
3. An injunction requiring Defendants to remove the Websites and all defamatory content disseminated as part of the defamation campaign, and restraining Defendants from publishing or disseminating any further defamatory statements concerning Gamma;

4. Pre- and post-judgment interest as permitted by law;
5. For its costs of suit, disbursements, and reasonable attorneys' fees to the extent permitted by law; and
6. For such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all issues so triable.

Respectfully submitted,

Dated: May 26, 2026
Los Angeles, CA

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