

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NADINE “NINA” COPLEY,

Plaintiff,

v.

ROBERT BRAXTON JARRATT, III

Defendant

Civil Action No. _____

COMPLAINT FOR DAMAGES

Plaintiff Nadine “Nina” Copley files this Complaint against Defendant Braxton Jarratt and alleges as follows:

INTRODUCTION

1. This case arises from a sexual assault and retaliatory defamation campaign perpetrated by Defendant Robert Braxton Jarratt against Plaintiff Nadine “Nina” Copley after Plaintiff rejected Defendant’s sexual conduct and disclosed the assault to trusted individuals.

2. Defendant cultivated a position of personal, professional, and financial influence over Plaintiff through a work-related nonprofit project known as “OneLight.” Defendant offered Plaintiff salary support, organizational

infrastructure, financial backing, and professional opportunities while presenting himself as Plaintiff's trusted collaborator, benefactor, and supporter.

3. On February 11, 2026, during a work-related gathering at Defendant's condominium in Fulton County, Georgia, Defendant sexually assaulted Plaintiff by forcibly pulling down Plaintiff's clothing and making nonconsensual sexual contact with Plaintiff's breast.

4. Plaintiff immediately rejected Defendant's conduct and later disclosed the assault to trusted individuals.

5. After Plaintiff began disclosing Defendant's misconduct, Defendant retaliated against Plaintiff through intimidation, threats, and a campaign of false accusations directed toward colleagues, supporters, and professional contacts.

6. Defendant falsely accused Plaintiff of theft, fraud, misuse of charitable funds, and conduct giving rise to "criminal liability," despite Defendant's prior written statements giving Plaintiff broad discretion over project expenditures and expressing complete trust in Plaintiff's handling of funds.

7. Defendant's conduct caused Plaintiff severe emotional distress, humiliation, anxiety, reputational harm, and damage to Plaintiff's professional and personal relationships.

8. Plaintiff brings this action for battery, intentional infliction of emotional distress, and defamation per se.

PARTIES, JURISDICTION, AND VENUE

9. Plaintiff Nadine “Nina” Copley is a citizen and resident of the State of Florida.

10. Defendant Braxton Jarratt is, upon information and belief, a citizen and resident of the State of New York.

11. This Court has subject matter jurisdiction under 28 U.S.C. § 1332 because the parties are citizens of different states and the amount in controversy exceeds \$75,000 exclusive of interest and costs.

12. This Court has personal jurisdiction over Defendant because Defendant committed tortious acts in the State of Georgia giving rise to this lawsuit.

13. Venue is proper in this Court under 28 U.S.C. § 1391 because a substantial portion of the events and omissions giving rise to Plaintiff’s claims occurred in Fulton County, Georgia.

FACTUAL ALLEGATIONS

14. Plaintiff is the founder of Project OneLight, a Florida-based charitable initiative focused on supporting nonspeaking autistic individuals and their families.

15. Defendant Robert Braxton Jarratt initially contacted Plaintiff in or about September 2025 and represented that he supported Plaintiff's mission and wanted to help expand Project OneLight.

16. Over the following months, Defendant cultivated a close professional relationship with Plaintiff and positioned himself as a major financial supporter of both Plaintiff and Project OneLight.

17. Beginning in September 2025, Defendant repeatedly represented that he would provide Plaintiff with paid employment, consulting opportunities, and ongoing financial support.

18. Among other things, Defendant told Plaintiff, "You have a job and a salary coming in January. Nothing changes there."

19. On January 30, 2026, Defendant told Plaintiff, "You can be a full time employee of onelight now. Let's do it. Whatever salary you want.... Pick a salary."

20. Defendant also told Plaintiff, "And we start paying you 12K/month as creative director."

21. Plaintiff reasonably understood Defendant to be acting as a trusted professional collaborator and benefactor.

22. In January 2026, Defendant transferred approximately \$88,000 to Project OneLight and told Plaintiff, “It’s yours to do what you want with.”

23. Defendant also told Plaintiff that he had “a couple million in cash available” and that Plaintiff did not need “to itemize or explain.”

24. On January 16, 2026, Defendant told Plaintiff, “I’m still going to fund onelight” and “I’m not giving up on you.”

25. Plaintiff’s relationship with Defendant was professional and platonic.

26. Plaintiff did not consent to any sexual contact with Defendant.

27. On February 11, 2026, Plaintiff attended a work-related gathering at Defendant’s condominium in Fulton County, Georgia.

28. Other work colleagues and project-related participants were present at the condominium during the gathering.

29. During the gathering, Defendant intentionally and without Plaintiff’s consent pulled down Plaintiff’s clothing and made sexual contact with Plaintiff’s breast.

30. Plaintiff immediately pushed Defendant away and told Defendant to stop.

31. Defendant's conduct was intentional, offensive, harmful, sexual in nature, and nonconsensual.

32. Shortly after the assault, Plaintiff disclosed Defendant's conduct and her resulting fear and distress to trusted individuals.

33. On March 2, 2026, Plaintiff directly disclosed the assault in writing to a trusted third party, stating, "He assaulted me Courtney. No one is hearing me."

34. After Plaintiff disclosed Defendant's misconduct, Defendant accused Plaintiff of defaming him. On March 24, 2026, Defendant falsely accused Plaintiff of sexually assaulting him.

35. Defendant also stated to Plaintiff, "A healthy, logical mind would understand and agree with this."

36. Plaintiff requested space and reduced communication with Defendant following the assault.

37. Defendant nevertheless continued contacting Plaintiff and escalating his communications.

38. On March 4, 2026, Defendant sent an email to multiple third parties, including Courtney Weal, Steven Li, Nikki Felding, Tyler Martin, and Addison Burke.

39. In that email, Defendant stated that there were “very disturbing developments regarding Nina and project onelight.”

40. Defendant falsely stated that Plaintiff had transferred funds to herself and another individual “under suspicious circumstances.”

41. Defendant falsely stated that Plaintiff “may have misappropriated as much as another 10-25K to friends, family and personal expenses.”

42. Defendant falsely stated that Plaintiff was “not responding to requests for transparency and returning of funds.”

43. Defendant instructed recipients, “I suggest not engaging with her proactively.”

44. In the same communication, Defendant stated that Plaintiff “may have misappropriated funds” and that Plaintiff’s conduct subjected her to “potential criminal liability.”

45. Defendant further stated, “it is not your personal piggy bank,” and accused Plaintiff of violating laws concerning “theft and fraud.”

46. Defendant stated that Plaintiff had done “irreparable harm” and was responsible for her own “bad behavior and actions.”

47. Defendant also stated that he hoped Plaintiff could “heal” from what had caused her “alarming behavior of late.”

48. The statements Defendant made about Plaintiff were false.

49. Defendant knew or should have known the accusations were false because Defendant had previously granted Plaintiff broad discretion regarding project expenditures and expressly stated, “I trust you 1000%.”

50. Defendant published these statements to discredit Plaintiff, intimidate Plaintiff, isolate Plaintiff from colleagues and supporters, and retaliate against Plaintiff after Plaintiff rejected Defendant’s conduct and disclosed the assault.

51. On March 24, 2026, Defendant escalated his threats by asserting that Plaintiff had committed “wire fraud,” stating that his “own contacts at the FBI” would “make sure this was prosecuted to the fullest extent of their power.” Defendant also referred to Plaintiff’s partner as her “literal partner-in-crime.”

52. Defendant’s conduct caused Plaintiff severe emotional distress, humiliation, anxiety, fear, mental anguish, reputational harm, and damage to Plaintiff’s professional and personal relationships.

53. Defendant acted intentionally, maliciously, and with conscious indifference to the consequences of his conduct.

COUNT I
BATTERY

54. Plaintiff incorporates by reference Paragraphs 1 through 53 as though fully set forth herein.

55. Defendant intentionally made harmful and offensive physical contact with Plaintiff.

56. Defendant intentionally made nonconsensual sexual contact with Plaintiff's breast.

57. Defendant's conduct constituted battery under Georgia law.

58. As a direct and proximate result of Defendant's battery, Plaintiff suffered damages including emotional distress, humiliation, anxiety, fear, mental anguish, and other damages to be proven at trial.

COUNT II
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

59. Plaintiff incorporates by reference Paragraphs 1 through 53 as though fully set forth herein.

60. Defendant's conduct was intentional or reckless.

61. Defendant's conduct was extreme and outrageous.

62. Defendant sexually assaulted Plaintiff after cultivating a position of trust, professional influence, and financial support over Plaintiff.

63. After Plaintiff rejected Defendant's conduct and disclosed the assault to trusted individuals, Defendant engaged in retaliatory, threatening, intimidating, and defamatory conduct directed at Plaintiff.

64. Defendant's conduct also included threats of criminal prosecution, references to FBI contacts, and accusations that Plaintiff and her partner were criminals.

65. Defendant's conduct included the sexual assault itself, followed by retaliation, intimidation, blame-shifting, threats of reputational and financial harm, statements implying Plaintiff was mentally unstable or irrational, and efforts to isolate Plaintiff from professional colleagues and supporters.

66. Defendant's conduct caused Plaintiff severe emotional distress.

67. As a direct and proximate result of Defendant's conduct, Plaintiff suffered damages.

COUNT III

DEFAMATION / DEFAMATION PER SE

68. Plaintiff incorporates by reference Paragraphs 1 through 53 as though fully set forth herein.

69. Defendant published the March 4, 2026 email to multiple third parties identified above.

70. Defendant falsely accused Plaintiff of transferring funds to herself “under suspicious circumstances.”

71. Defendant falsely accused Plaintiff of misappropriating charitable funds.

72. Defendant falsely accused Plaintiff of conduct giving rise to “criminal liability.”

73. Defendant falsely accused Plaintiff of “theft and fraud.”

74. Defendant falsely accused Plaintiff of treating charitable funds as her “personal piggy bank.”

75. Defendant’s statements were false.

76. Defendant’s statements were factual assertions or statements implying undisclosed defamatory facts.

77. Defendant knew the statements were false or acted with reckless disregard for whether they were true or false.

78. Defendant's statements were of and concerning Plaintiff.

79. Defendant acted with at least negligence as to the truth or falsity of the statements.

80. Plaintiff is a private individual and is not a public figure.

81. Defendant's statements were unprivileged.

82. Defendant knew or should have known the accusations were false because Defendant had previously granted Plaintiff broad discretion regarding project expenditures and expressly stated, "I trust you 1000%."

83. Defendant published the statements maliciously and with the intent to damage Plaintiff's reputation, intimidate Plaintiff, isolate Plaintiff, and retaliate against Plaintiff after Plaintiff rejected Defendant's conduct and disclosed the assault.

84. Defendant's statements constitute defamation per se because they accused Plaintiff of criminal conduct, dishonesty, fraud, theft, and misconduct injurious to Plaintiff's reputation and profession.

85. As a direct and proximate result of Defendant's defamatory statements, Plaintiff suffered reputational harm, humiliation, emotional distress, mental anguish, loss of professional relationships, and other damages to be proven at trial.

86. Plaintiff is entitled to presumed damages, compensatory damages, punitive damages, attorney's fees, and costs.

PUNITIVE DAMAGES

87. Plaintiff incorporates by reference Paragraphs 1 through 86 as though fully set forth herein.

88. Defendant's conduct showed willful misconduct, malice, fraud, wantonness, oppression, and conscious indifference to consequences.

89. Defendant intentionally sexually battered Plaintiff and thereafter engaged in retaliatory, threatening, malicious, and defamatory conduct designed to intimidate Plaintiff, damage Plaintiff's reputation, and isolate Plaintiff from colleagues and supporters.

90. Defendant's conduct was intentional, malicious, oppressive, and undertaken with conscious disregard for the consequences to Plaintiff.

91. Plaintiff is entitled to punitive damages pursuant to O.C.G.A. § 51-12-5.1.

ATTORNEY'S FEES AND EXPENSES OF LITIGATION

O.C.G.A. § 13-6-11

92. Plaintiff incorporates by reference Paragraphs 1 through 91 as though fully set forth herein.

93. Defendant acted in bad faith and caused Plaintiff unnecessary trouble and expense.

94. Plaintiff is entitled to recover attorney's fees and expenses of litigation pursuant to O.C.G.A. § 13-6-11.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment in favor of Plaintiff and against Defendant;
- b. Award compensatory damages in an amount to be determined by the jury;
- c. Award presumed damages for defamation per se;
- d. Award punitive damages;
- e. Award attorney's fees and expenses of litigation;
- f. Award pre-judgment and post-judgment interest as allowed by law;

g. Award costs of this action; and

h. Grant such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

Dated this 8th day of May 2026.

COHEN HIRSCH, LP

/s/Andrea S. Hirsch

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