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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

Krista Conlin,

Plaintiff,

vs.

Sepehr Ebrahimzadeh and Kathryn
Teagarden, husband and wife
and the marital community
composed thereof,

Defendants.

Case No.:

COMPLAINT

COMES NOW the plaintiff, and for causes of action against the defendants
herein, alleges as follows:

I. PARTIES

1.1 Plaintiff, Krista Conlin ("Conlin") is a resident of the State of
Alabama.

1.2 Defendants Sepehr Ebrahimzadeh and Kathryn Teagarden are
husband and wife and are residents of Washington State who have engaged in
business and committed wrongful acts within Washington State. Sepehr
Ebrahimzadeh and Kathryn Teagarden are alleged to have been acting at all
times pertinent hereto on behalf of one another and on behalf of their marital
community ("Ebrahimzadeh").

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II. JURISDICTION AND VENUE

2.1 Jurisdiction of this matter is vested in the Superior Court of the State of Washington, and venue of this cause properly lies in King County Superior Court pursuant to RCW 4.12.020 (3).

III. GENERAL FACTUAL ALLEGATIONS

3.1 The allegations of paragraphs 1.1 through 2.1 are incorporated by reference as though fully set forth herein.

3.2 Ebrahimzadeh has for a period of several years appropriated and used for trade, commerce and profit the likeness of Conlin, all without her knowledge or consent.

3.3 Said misappropriation has been widely disseminated and published on internet websites, including Airbnb and Vrbo, and has resulted in the consummation of transactions for profit with thousands of persons, all based on the use of Conlin's likeness.

IV. INVASION OF PRIVACY

4.1 The allegations of paragraphs 1.1 through 3.3 are incorporated by reference as though fully set forth herein.

4.2 Ebrahimzadeh has intentionally and without Conlin's consent used and might still be using her likeness to create an impersonation of Conlin that other persons have reasonably believed was and is Conlin.

4.3 Ebrahimzadeh has intentionally and without Conlin's consent impersonated and might still be impersonating Conlin on social networking websites as defined by RCW 4.24.790.

1 4.4 Through said impersonations Ebrahimzadeh intended to deceive or
2 mislead for the purpose of defrauding Conlin.

3 4.5 Said impersonation has proximately caused injury to Conlin,
4 including to reputation, humiliation and injury to professional standing.

5 4.6 Pursuant to RCW 4.24.790, Conlin is entitled to the recovery of
6 actual damages, injunctive relief, declaratory relief and the recovery of litigation
7 costs and reasonable attorneys' fees.

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9 V. INFRINGEMENT OF PERSONALITY RIGHTS

10 5.1 The allegations of paragraphs 1.1 through 4.6 are incorporated by
11 reference as though fully set forth herein

12 5.2 Ebrahimzadeh has used and might still be using Conlin's likeness
13 for purposes of advertising goods or services disseminated and published in
14 Washington State without Conlin's consent and has accordingly infringed Conlin's
15 personality rights.

16 5.3 Ebrahimzadeh is liable pursuant to RCW 63.60.060 for damages
17 sustained as a result of said infringement together with all profits that are
18 attributable to the infringement.

19 5.4 Pursuant to RCW 63.60.060 Conlin is entitled to obtain injunctive
20 relief to prevent or restrain the use of photographs of her, her likeness and to
21 impoundment and destruction of materials pertaining to the same.

1 5.5 Pursuant to RCW 63.60.060 Conlin is entitled to recover reasonable
2 attorneys' fees, expenses and court costs incurred in recovering any remedy or
3 defending any claim brought under said section.
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5 VI. VIOLATION OF WASHINGTON STATE CONSUMER PROTECTION ACT

6 6.1 The allegations of paragraphs 1.1 through 5.5 are incorporated by
7 reference as though fully set forth herein.

8 6.2 The internet presence, practices and activities of Ebrahimzadeh in
9 Washington State as described above makes their conduct a vital matter affecting
10 the public interest with regard to the citizens of Washington state and beyond.

11 6.3 The conduct of Ebrahimzadeh has been and is unfair and deceptive.
12 Said actions took place and are taking place as part of trade or commerce, and it is
13 unknown at this time how many Washington State citizens and others have been
14 deceived. The public interest in preventing this conduct is obvious and pressing.

15 6.4 Said actions constitute violations of the Washington State Consumer
16 Protection Act, Chapter RCW 19.86, et seq., and have injured Conlin.

17 6.5 As a direct and proximate result of said violations, Conlin has
18 suffered damages in an amount to be proven at trial, plus penalties, including treble
19 damages, attorney fees and costs.

20 VII. WRONGFUL CONVERSION

21 7.1 The allegations of paragraphs 1.1 through 6.5 are incorporated by
22 reference as though fully set forth herein.

23 7.2 Ebrahimzadeh has willfully and intentionally misappropriated and
24 wrongfully converted to their own use the likeness of Conlin.

25 7.3 Said actions constitute wrongful and fraudulent conversion.

 7.4 As a direct and proximate result of said actions, Conlin has suffered
damages in an amount to be proven at trial.

1 VIII. INTENTIONAL FRAUD AND MISREPRESENTATION

2 8.1 The allegations of paragraphs 1.1 through 7.4 are incorporated by
3 reference as though fully set forth herein.

4 8.2 Ebrahimzadeh has and is fraudulently impersonating Conlin.

5 8.3 Knowing that their statements and acts were and are wrongful, false,
6 misleading and deceptive, Ebrahimzadeh intended that the public rely on said
7 statements, acts, omissions and concealments and the public had the right to rely
8 on the same, causing damage to Conlin.

9 8.4 As a direct and proximate result of said statements, acts, omissions
10 and concealments of fact, Conlin has been damaged in an amount to be proven at
11 trial.

12 IX. UNJUST ENRICHMENT AND RESTITUTION

13 9.1 The allegations of paragraphs 1.1 through 8.4 are incorporated by
14 reference as though fully set forth herein.

15 9.2 Ebrahimzadeh has received substantial benefit from the use of
16 Conlin's likeness that they have failed to compensate Conlin for. Ebrahimzadeh has
17 been unjustly enriched.

18 9.3 Based upon justice, morals, equity and good conscience, this Court
19 should require Ebrahimzadeh to compensate Conlin in an amount to be proven at
20 trial.

21 X. DEFAMATION

22 10.1 The allegations of paragraphs 1.1 through 9.3 are incorporated by
23 reference as though fully set forth herein.

24 10.2 Knowing that their representations and statements regarding
25 Conlin's likeness were false, Ebrahimzadeh published defamatory statements
regarding Conlin.

1 10.3 Ebrahimzadeh's untrue and defamatory statements have injured
2 Conlin.

3 10.4 Conlin has suffered damages in an amount to be proven at trial.

4 XI. CIVIL CONSPIRACY

5 11.1 The allegations of paragraphs 1.1 through 10.4 are incorporated by
6 reference as though fully set forth herein.

7 11.2 The actions of Ebrahimzadeh in combination with others constituted
8 a conspiracy to defraud Conlin and to commit the other wrongful actions alleged
9 herein. This Complaint may accordingly be amended as discovery proceeds in order
10 to name additional defendants.

11 11.3 As a direct and proximate result of said misconduct, Conlin is
12 entitled to the recovery of damages in an amount to be proven at trial.

13 XII. PRAYER FOR RELIEF


14 WHEREFORE, Plaintiff prays for the following relief:

15 12.1 Judgment against defendant Ebrahimzadeh in an amount to be
16 proven at trial, together with pre-judgment interest, costs and attorney fees;

17 12.2 For appropriate injunctive relief; and,

18 12.2 For such other and further relief as the Court may deem just,
19 proper and equitable.

20 DATED this 15th day of May, 2025.

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22 Alan S. Donaldson, WSBA# 16142