

IN THE MATTER OF
THE MARRIAGE OF

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IN COUNTY COURT AT LAW

NUMBER 3

ASHLEY DIANA BLACK
AND
DARUSH BEYZAD SAMIA

GALVESTON COUNTY, TEXAS

**FIRST AMENDED PETITION FOR ENFORCEMENT OF
PERMANENT INJUNCTIONS BY CONTEMPT**

1. Discovery

Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

2. Objection to Assignment of Case to Associate Judge

Petitioner objects to the assignment of this matter to an associate judge for a trial on the merits or presiding at a jury trial.

3. Parties

This suit is brought by **ASHLEY DIANA BLACK**, Petitioner. The last three numbers of **ASHLEY DIANA BLACK**'s driver's license number are [REDACTED]. The last three numbers of **ASHLEY DIANA BLACK**'s Social Security number are [REDACTED].

Respondent is **DARUSH BEYZAD SAMIA**.

4. Jurisdiction

This Court has continuing, exclusive jurisdiction of this suit.

5. Parties Entitled to Notice

The parties entitled to notice are as follows:

Respondent, **DARUSH BEYZAD SAMIA**, who should be served with process at [REDACTED] [REDACTED] Los Angeles, California 90038, or wherever he may be found

6. Order to be Enforced

On July 1, 2016, this Court signed the *Agreed Final Decree of Divorce*, which is attached hereto as Exhibit "A" and incorporated as if set forth herein verbatim. The *Agreed Decree* states in relevant part, beginning on page 9, as follows:

"Injunctive Relief

The Court finds that, because of the conduct of **DARUSH BEYZAD SAMIA**, a permanent injunction against him should be granted as appropriate relief because there is no adequate remedy at law.

The permanent injunction granted below shall be effective immediately and shall be binding on **DARUSH BEYZAD SAMIA**; on his agents, servants, employees, and attorneys; and on those persons in active concert or participation with them who receive actual notice of this order by personal service or otherwise.

IT IS ORDERED AND DECREED that **DARUSH BEYZAD SAMIA** is permanently enjoined from:

6. Making disparaging remarks to any client, customer, vendor, business associate, partner, employee or any other person associated with any business entity in which **ASHLEY DIANA BLACK** has an interest (including but not limited to ADB Interests, LLC, ADB Innovations, LLC, Ashley Black Fasciology, LLC, Ashley Black International Holdings, LLC, Ashley Diana Productions, LLC).

7. Making any disparaging remarks regarding **ASHLEY DIANA BLACK** or any business entity in which Petitioner has an interest (including but not limited to ADB Interests, LLC, ADB Innovations, LLC, Ashley Black Fasciology, LLC, Ashley Black International Holdings, LLC, Ashley Diana Productions, LLC) on any media venue or social media site, including but not limited to Facebook, LinkedIn, Avvo, The Ripoff Report, Yelp or any other rating sites.

8. Using any personal information of **ASHLEY DIANA BLACK** or any entity in which **ASHLEY DIANA BLACK** has an interest (including but not limited to ADB Interests, LLC, ADB Innovations, LLC, Ashley Black Fasciology, LLC, Ashley Black International Holdings, LLC, Ashley Diana Productions, LLC) known to Respondent for financial gain, notoriety, or to disparage and cause damage to **ASHLEY DIANA BLACK** or any entity in which **ASHLEY DIANA BLACK** has an interest through any medium, including but not limited to film, television, publications, media outlets, magazines, or book deals.”

Petitioner was the Petitioner and Respondent was the Respondent in the prior proceedings.

7. Manner of Noncompliance

Respondent, **DARUSH BEYZAD SAMIA**, has failed and refused to comply with the *Agreed Final Decree of Divorce* and has violated the Court's order regarding the permanent injunctions described above as follows:

Violation 1: On April 28, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions by using and disseminating to clients and potential customers certain personal information of **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest to disparage to **ASHLEY DIANA BLACK** and entities in which she has an interest. Specifically, **ASHLEY DIANA BLACK** discovered that **DARUSH BEYZAD SAMIA** provided information concerning an executive in **ASHLEY DIANA BLACK's** company to clients and potential customers in an online hate group. Such conduct violates permanent injunction numbers 6-8, as the information was personal, communicated to both current clients and potential customers via social media to disparage **ASHLEY DIANA BLACK** and/or entities in which she has an interest, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest.

Violation 2: On April 29, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **ASHLEY DIANA BLACK** discovered that **DARUSH BEYZAD SAMIA** was fomenting litigation against **ASHLEY DIANA BLACK** and/or her entities by suggesting to current customers on social media certain procedural vehicles for bringing such litigation and offering to the same individuals his services as an expert witness. Such conduct violates permanent injunctions numbers 6-8, as the information was personal, communicated to both current clients and potential customers via social media to disparage and cause damage to **ASHLEY DIANA BLACK** and/or entities in which she has an interest, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 3: On April 29, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions by disseminating personal information of

ASHLEY DIANA BLACK to incite litigation and cause damage to **ASHLEY DIANA BLACK** and entities in which she has an interest. Specifically, **ASHLEY DIANA BLACK** discovered via social media that **DARUSH BEYZAD SAMIA** provided **ASHLEY DIANA BLACK**'s personal residential address to an individual in a hate group seeking restitution against **ASHLEY DIANA BLACK** and entities in which she has an interest. Such conduct violates permanent injunction 8, as the information is the personal information of **ASHLEY DIANA BLACK** and was disseminated for the sole purpose of causing damage to **ASHLEY DIANA BLACK** and/or her entities.

Violation 4: On April 29, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by disseminating via social media personal details regarding the parties' marriage and divorce to current and former customers of **ASHLEY DIANA BLACK** and entities in which she has an interest. Specifically, **DARUSH BEYZAD SAMIA** provided details of an alleged incident involving a marital dispute between the parties in which **DARUSH BEYZAD SAMIA** claims to have been threatened by **ASHLEY DIANA BLACK** and in which the police were allegedly involved. Such conduct violates permanent injunctions numbers 6-8, as the information was personal, communicated to both current clients and potential customers via social media to disparage and cause damage to **ASHLEY DIANA BLACK** and/or entities in which she has an interest, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 5: On May 8, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", claiming that **ASHLEY DIANA BLACK** had engaged in "distortion of the truth" in regards to her product through ADB Interests, LLC, the Fascia Blaster, and website postings on her Facebook page, Ashley Black Guru. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 6: On May 8, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters “The Real Truth”, claiming that the Facia Blaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, can cause strokes and may have caused **ASHLEY DIANA BLACK**’s stepmother to have a stroke. and website postings on her Facebook page, Ashley Black Guru. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers. Such conduct violates permanent injunctions numbers 6-8, as the information was personal, communicated to both current clients and potential customers via social media to disparage and cause damage to **ASHLEY DIANA BLACK** and/or entities in which she has an interest, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 7: On May 9, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters “The Real Truth”, claiming that use of the Facia Blaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, is the same as blunt force trauma. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 8: On May 9, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters “The Real Truth”, claiming that the Facia Blaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, has caused

pulmonary embolisms in customers and that his warnings to **ASHLEY DIANA BLACK** regarding the same were ignored. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 9: On May 9, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", claiming that Goop's promotion of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, was simply done for "financial reasons" and encouraging users to report the product to the FDA, Ripoff Report, and Med Watch. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 10: On May 9, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", indicating that **ASHLEY DIANA BLACK** was making false claims in regards to her product, the FasciaBlaster. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 11: On May 9, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", telling customers to stop using the FasciaBlaster

due to alleged harmful side effects. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 12: On May 10, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", telling customers that **ASHLEY DIANA BLACK** is using people as "guinea pigs" to promote her product, the FasciaBlaster. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 13: On May 10, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", claiming that the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, has not been properly tested and causes serious side effects, including death and miscarriages. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 14: On May 11, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", telling customers that a photograph posted of **ASHLEY DIANA BLACK** after using the FasciaBlaster was over five years old and that the

product had not been invented at that time. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 15: On May 11, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by using and revealing personal information of **ASHLEY DIANA BLACK** to clients and potential customers. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", revealing **ASHLEY DIANA BLACK**'s date of birth and age. Such conduct violates permanent injunction 8 as the information was personal, communicated to both current clients and potential customers via social media to disparage and cause damage to **ASHLEY DIANA BLACK** and/or entities in which she has an interest, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 16: On May 11, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", telling customers that the malpractice insurance for a member of **ASHLEY DIANA BLACK**'s Fasciology Board, who is a physician, will "go through the roof" due to potential litigation against **ASHLEY DIANA BLACK** and/or entities in which she has an interest. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 17: On May 11, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", telling customers that **ASHLEY DIANA BLACK** is cheating the import tax and that such misconduct should be reported to the appropriate

authorities. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 18: On May 11, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by using and revealing personal information of **ASHLEY DIANA BLACK** to clients and potential customers. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", revealing **ASHLEY DIANA BLACK**'s date of birth. Such conduct violates permanent injunctions 8 as the information was personal, communicated to both current clients and potential customers via social media to disparage and cause damage to **ASHLEY DIANA BLACK** and/or entities in which she has an interest, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 19: On May 12, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", telling customers that **ASHLEY DIANA BLACK** made up terms in regards to the results and side effects of using the FasciaBlaster. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 20: On May 12, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment to the Facebook hate group, Blasters "The Real Truth", telling customers to request that **ASHLEY DIANA BLACK** pay for their medical bills associated with the side effect of using the FasciaBlaster and report such side effects to the FDA. Such conduct violates permanent

injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 21: On May 18, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on Facebook regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, and claiming that the product should be taken off the market until deemed safe for individual use. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 22: On May 18, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on YouTube regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, and claiming that the product should be taken off the market until deemed safe for individual use. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 23: On May 18, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment on Facebook regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, and claiming that the product should be taken off the market until deemed safe for individual use. In addition thereto, **DARUSH**

BEYZAD SAMIA posted a picture of the FasciaBlaster juxtaposed with a “Caution” graphic. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK’s** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 24: On May 19, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on YouTube entitled, “After Fascia Blaster ‘Truth’ Day 1” regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, claiming that **ASHLEY DIANA BLACK** puts money before health and safety and that he will continue to update and post every day until he is shut down by impending litigation. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK’s** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 25: On May 19, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on Facebook entitled, “After Fascia Blaster ‘Truth’ Day 1” regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, claiming that **ASHLEY DIANA BLACK** puts money before health and safety and that he will continue to update and post every day until he is shut down by impending litigation. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK’s** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 26: On May 19, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and

potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a comment made by **ASHLEY DIANA BLACK** on the uses of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, and warning customers not to use the FasciaBlaster on children. In addition thereto, **DARUSH BEYZAD SAMIA** juxtaposed this comment with a picture of a guinea pig. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 27: On May 19, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on YouTube entitled, "Life After Telling the Truth" regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, claiming that the impending litigation was a sign that he needed to take action and come forward with more disparaging details regarding the FasciaBlaster as he is the only person with the credibility to do so. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 28: On May 20, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment claiming that employees of **ASHLEY DIANA BLACK** had removed negative posts and encouraging further feedback and disparagement of the product and the tactics employed by **ASHLEY DIANA BLACK** in the hate group. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 29: On May 21, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a comment on Facebook regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, and claiming that the product should be taken off the market until deemed safe for individual use. In addition thereto, **DARUSH BEYZAD SAMIA** posted a picture of the FasciaBlaster juxtaposed with a “Caution” graphic. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 30: On May 21, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared photos of results from use of the FasciaBlaster that were posted on **ASHLEY DIANA BLACK**’s Facebook page, Ashley Black Guru, under the caption “Fascia Blaster ‘Deception Revealed’ Truth”. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 31: On May 21, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a purported message he received from employees of **ASHLEY DIANA BLACK** and referred to the same individuals as “bullies”. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 32: On May 21, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on YouTube entitled, “Fascia Blaster Truth Update 2” regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, claiming that **ASHLEY DIANA BLACK** is stretching the truth and encouraging customers to report her to the FDA. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 33: On May 21, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on Facebook entitled, “Fascia Blaster Truth Update 2” regarding the side effects of the FasciaBlaster, a product of ADB Interests, LLC, an entity owned and operated by **ASHLEY DIANA BLACK**, claiming that **ASHLEY DIANA BLACK** is stretching the truth and encouraging customers to report her to the FDA. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 34: On May 21, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared photos of results from use of the FasciaBlaster that were posted on **ASHLEY DIANA BLACK**’s Facebook page, Ashley Black Guru, under the caption “Fascia Blaster ‘Deception Revealed’ Truth”. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and

potential customers.

Violation 35: On May 21, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted warnings on the Facebook page, “Blaster the Real Story”, claiming that use of the FasciaBlaster on the abdomen could cause damage to the ureter. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 36: On May 22, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted to Facebook that he had started a new Facebook page entitled, “Blaster the Real Story”, to “bring awareness to the pros and cons of the FasciaBlaster.” Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 37: On May 22, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a posting from the Ashley Black Guru page regarding the FaceBlaster Gift Set with his newly formed Facebook group, “Blaster the Real Story”, cautioning customers against the ingredients contained in the products. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**’s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 38: On May 22, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and

potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted to Facebook an article regarding the causes of miscarriages and telling customers that the FasciaBlaster can cause miscarriages. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 39: On May 22, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a posting from the Ashley Black Guru page, commenting, “FasciaBlaster False Claims. 100% effective.” Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 40: On May 22, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared an alleged statement made by **ASHLEY DIANA BLACK** to customers regarding the FasciaBlaster and referring to said statement as “fear porn”. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 41: On May 22, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a YouTube video tutorial on the FasciaBlaster, warning customers to not use the FasciaBlaster on the face or neck and claiming certain side effects from doing the same, including stoke. Such conduct violates

permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 42: On May 23, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a video on YouTube entitled, "Uncovering the Truth: FasciaBlasting the Untold Story", claiming therein that the impending litigation was a sign that he needed to come out with the truth and alleging that **ASHLEY DIANA BLACK** is more focused on money rather than doing the right thing. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 43: On May 23, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a picture claiming to be "blunt force trauma" from the use of FasciaBlaster to his newly formed Facebook Group, "Blaster the Real Story." Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 44: On May 23, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a purported copy of the FasciaBlaster Terms and Conditions on Facebook, making claims that **ASHLEY DIANA BLACK** is lying to everyone. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential

customers, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 45: On May 23, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** posted a picture to Facebook of a woman using the FasciaBlaster next to a caption stating, "FasciaBlaster Deception." Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 46: On May 27, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a post regarding a Go Fund Me page dedicated to those being "threatened with lawsuits" by **ASHLEY DIANA BLACK** with his newly formed Facebook Group, "Blaster the Real Story", and encouraged people to contribute to the same. In addition thereto, **DARUSH BEYZAD SAMIA** referred to the "unethical practices" of **ASHLEY DIANA BLACK**. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK's** worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 47: On May 28, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a post on Facebook regarding a Go Fund Me page dedicated to those being "threatened with lawsuits" by **ASHLEY DIANA BLACK** and encouraged people to contribute to the same. In addition thereto, **DARUSH BEYZAD SAMIA** referred to the "unethical practices" of **ASHLEY DIANA BLACK**. Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated

via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 48: On May 28, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a posting on Facebook from the Ashley Black Guru page regarding the results of the FaciaBlaster, referring to the same as “smoke and mirrors.” Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

Violation 49: On May 29, 2017, **DARUSH BEYZAD SAMIA** willfully and intentionally violated the permanent injunctions of this Court by making disparaging remarks to clients and potential customers about **ASHLEY DIANA BLACK** and entities in which **ASHLEY DIANA BLACK** has an interest. Specifically, **DARUSH BEYZAD SAMIA** shared a posting from the Ashley Black Guru page regarding the results of the FaciaBlaster with his newly formed Facebook group, “Blaster the Real Story”, claiming that the photos are not evidence of the effects of the FasciaBlaster and that the same were posted by **ASHLEY BLACK** in a “clear attempt to deceive the public.” Such conduct violates permanent injunctions 6 and 7 as the disparaging remarks were communicated via social media to current clients and potential customers, and tends to lower **ASHLEY DIANA BLACK**'s worth or esteem and the reputation of entities in which she has an interest amongst her clients and potential customers.

8. Contempt and Confinement Requested

Petitioner, **ASHLEY DIANA BLACK**, requests that for each violation in this Petition, Respondent, **DARUSH BEYZAD SAMIA**, be held in contempt, jailed for a period of not more than six months, and fined, not more than \$500.00. **ASHLEY DIANA BLACK** further requests that each period of confinement run and be satisfied concurrently.

9. Community Supervisions Requested

ASHLEY DIANA BLACK requests that Respondent, **DARUSH BEYZAD SAMIA**, be placed on community supervision for ten years on release from jail or suspension of commitment.

10. Clarification Requested

ASHLEY DIANA BLACK requests that, if the Court finds that any part of the order sought to be enforced is not specific enough to be enforced by contempt, the Court enter a clarifying order more clearly specifying the duties imposed on Respondent, **DARUSH BEYZAD SAMIA**, and giving **DARUSH BEYZAD SAMIA** a reasonable time within which to comply.

11. Attorney's Fees, Expenses and Costs

It was necessary to secure the services of **TAYLOR T. IMEL**, a licensed attorney, and the firm of **KOONSFULLER, P.C.** to enforce and protect the rights of **ASHLEY DIANA BLACK**. Respondent, **DARUSH BEYZAD SAMIA**, should be ordered to pay reasonable attorney's fees, expenses, and costs, and a judgment should be rendered in favor of the attorney and against Respondent, **DARUSH BEYZAD SAMIA**, and be ordered paid directly to the undersigned attorney, who may enforce the judgment in the attorney's own name. Petitioner, **ASHLEY DIANA BLACK**, requests postjudgment interest as allowed by law.

12. Prayer

Petitioner, **ASHLEY DIANA BLACK**, prays that citation and notice issue as required by law, that **DARUSH BEYZAD SAMIA** be held in contempt and punished as requested, that the Court order community supervision, that the Court clarify any part of its prior order found not to be specific enough to be enforced by contempt, for attorney's fees, expenses, costs, and interest, and for all further relief authorized by law.

Respectfully submitted,

KOONSFULLER, P.C.
109 North Post Oak Lane, Suite 425
Houston, Texas 77024
Tel: (713) 789-5112
Fax: (713) 789-5123
houston@koonfuller.com (for service only)

By: _____
TAYLOR T. IMEL
taylor@koonfuller.com
State Bar No. 24073302
Attorneys for Petitioner,
ASHLEY DIANA BLACK