

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

BENJAMIN RADFORD,

Plaintiff,

v.

No. 1:14-CV-02620-JLK/MJW

KAREN STOLLZNOW,

Defendant.

**AMENDED COMPLAINT FOR DEFAMATION, FRAUD AND  
INTERFERENCE WITH BENEFICIAL CONTRACTUAL RELATIONS**

**General Nature of Plaintiff's Claims**

1. Plaintiff Benjamin Radford (“Radford”) brings this complaint to recover damages arising from malicious, false and defamatory public and private statements made about him by defendant Karen Stollznnow (“Stollznnow”) in 2013; to recover damages arising from her fraudulent conduct and; to recover damages from her intentional, wrongful and fraudulent interference with Radford’s business relationships with others.

2. Radford and Stollznnow have been professional colleagues since 2009 in the “skeptics” movement, which is described below.

3. In 2008, Stollznnow initiated a sexual relationship with Radford that lasted into 2010. Because they lived in different states, Radford and Stollznnow met sporadically for sex and companionship, including in New Mexico, California, Nevada and elsewhere.

4. By 2011 Radford’s and Stollznnow’s relationship was no longer sexual, though their friendship and professional relationship (consisting mostly of recording “podcasts” together, but from different locations) continued until early 2013, when Stollznnow suddenly,

falsely and maliciously told Radford's employer—and stated in her “guest blog” on the prominent Scientific American web site—that since 2009 Radford had been stalking her and that Radford's “psychological abuse” had “turned physical,” and he had “sexually harassed” and “sexually assaulted” her “for years.” It is an understatement to say that her allegations came as a complete surprise to Radford, given that their sexual relationship had ended more than two years earlier, had been initiated by Stollznnow in the first place, had included sexual encounters arranged by Stollznnow as late as April 2010, and included a suggestion by her in September 2010 that they continue their affair, even though she planned to marry another man she had been seeing. Further, after their sexual relationship ended, they maintained a cordial and friendly professional relationship, as evidenced by their friendly professional interactions, including their extensive and friendly email correspondence up until early 2013, when Stollznnow maliciously defamed Radford.

5. While Stollznnow's motives in suddenly defaming Radford, who was her then colleague and had been her lover, may be somewhat obscure, Stollznnow had apparently become suddenly and irrationally angry at Radford when he complained to her and a third colleague that he did not believe Stollznnow was pulling her weight in the production of the podcast, “MonsterTalk” that the three of them had been producing together since 2009. Stollznnow may well have had other motives for her outbursts, likely including perceived competition with Radford in the “skeptics” movement in which Stollznnow and Radford have been making their livings, and/or because her sexual relationship with Radford had overlapped a relationship with the man who is now her husband, to whom she may have claimed fidelity at the same time she was engaging in sexual liaisons with Radford. Radford has learned that Stollznnow is prone to viciously attack people who are close to her who have done something to anger her.

6. As a result of her false public and private statements about Radford, his professional and personal reputation has been enormously harmed, perhaps irreparably, as explained in greater detail below. Radford now seeks compensation.

### **Parties**

7. Radford is a resident of Sandoval County, New Mexico

8. Karen Stollznnow is a resident of Arvada, Colorado. Her actions that are the subject of this complaint were intentional and malicious, directed toward causing harm to the plaintiff in New Mexico, and did cause harm to the plaintiff in this state, where he lives. Under the decisional law of the courts of New Mexico and the United States Supreme Court, this court has personal jurisdiction over Stollznnow.

### **Nature Of The “Skeptics” Movement, The Parties’ Relationship To It And The Harm That Stollznnow’s Lies About Radford Have Caused**

9. Both Radford and Stollznnow have been for years prominent figures in what is known as the “skeptics” movement. The movement, with which hundreds of thousands of people associate themselves to greater or lesser degrees, is centered on the philosophy that no assertion should be accepted as fact without proof. Though skepticism as a philosophy dates back to Scottish philosopher David Hume (1711-1776), magician Harry Houdini (who exposed fraudulent psychic mediums in the 1920s), and even earlier, it was not until the 1970s that a formalized skeptical movement emerged. Past and current prominent skeptics have included Carl Sagan, Isaac Asimov, Bill Nye “The Science Guy,” evolutionary biologist Richard Dawkins, James Randi (who famously debunked spoon-bending “psychic” Uri Geller in the 1970s), Adam Savage (of the “Mythbusters” television show), Penn Jillette (of the magic duo Penn & Teller), and many others including several Nobel laureates. Skeptics, including Radford and Stollznnow,

routinely research and/or investigate a wide variety of claims for which there is insufficient scientific evidence, including alternative medicine, pseudoscience and astrology, as well as more exotic (but no less popular) subjects such as ghosts, faith healing, and unsubstantiated conspiracy theories. Skeptics come from a wide variety of fields including physics, psychology, medicine, astronomy, and mathematics. The movement seeks to engender science literacy, media literacy, and the promotion of critical thinking among members of the public.

10. Part of the formalization of the skeptics movement was the establishment of a non-profit educational foundation, the Center For Inquiry (“CFI”), which is devoted to the promotion of skeptical thought and the principles of the skeptics movement. CFI also publishes a magazine, “The Skeptical Inquirer,” of which Radford is Deputy Editor.

11. CFI employs Radford as a writer, investigator, columnist, and editor. In addition to his work and his employment by CFI, Radford makes his living by speaking at conferences, writing books and articles and otherwise, within the skeptics movement. He also works as a freelance writer for Discovery News and other news outlets.

12. Personal credibility is essential within the skeptics movement as well as in a journalism career. Radford has spent most of his adult life in the promotion of skepticism and science literacy, and has authored or co-authored six books and over a thousand articles and columns over the past fifteen years. He holds a Bachelor’s Degree in psychology from the University of New Mexico and recently completed a Masters Degree in science education from the State University of New York at Buffalo. Before the events leading to this litigation, Radford often appeared on television shows and other prominent venues. He speaks at conferences and universities across the country.

13. Stollznow's false allegations of sexual harassment—not to mention of stalking and sexual assault—have been particularly damaging to Mr. Radford's career within the skeptics movement because, like many modern subcultures, its communications are centered on the internet. As a consequence, anyone searching for information on Radford's work or background on the internet now finds, on any of dozens of blogs and web sites, repetitions of and references to Stollznow's false accusations. Radford's current and potential employers received dozens of angry e-mails demanding that he be fired from his job, and threatening to boycott future events at which he may appear. Stollznow's accusations against him, which have spread in this fashion throughout the internet, have almost certainly precluded him from being considered for television shows, magazine and internet articles and other opportunities for advancement. Any producer or writer who did a quick Google search of his name would easily find the defamatory statements about him and would likely be unwilling to be associated with him. There are many potential experts associated with skepticism that a television producer or radio host could invite to participate, and it is now unlikely that any would select the plaintiff. All of Radford's years of hard work promoting critical thinking, logic, and science literacy become irrelevant when phrases such as "sexual assault" and "sexual predator" are associated with him, as they would in the case of any other public figure.

#### **Events Giving Rise To This Complaint**

14. Beginning in 2009, Stollznow and Radford became professional colleagues, co-authors and producers of podcasts, occasional panel members together at "skeptics" conventions and gatherings, and lovers. Because they have lived in different states throughout their acquaintance (and never shared an office, a building, or even an employer), their intimate relationship consisted of sporadic meetings at conventions or on other occasions during which

they had sexual encounters. Over the three year period beginning in 2008, they met and had sex on at least three occasions, including a long weekend in New Mexico, when Stollznnow traveled to this state to continue their sexual liaisons. Their last such encounter occurred in April 2010 in a hotel room in San Francisco that Stollznnow, who lived in Berkeley at the time, rented so that she and Radford could meet for sex. During that encounter Stollznnow explicitly told Radford that she wished to continue their casual sex encounters despite her impending marriage to her now-husband Matthew Baxter.

15. A few months thereafter, Radford and Stollznnow met in her hotel room at a skeptics conference in Las Vegas, Nevada. During their conversation he suggested that they have sex. Stollznnow declined, for a reason unrelated to any apparent change of heart toward Radford, but which is unnecessary to include in this complaint. Radford and Stollznnow continued what was a friendly conversation and parted ways. They continued a friendly and professional relationship, regularly exchanging cordial emails (detailed below), attending and speaking at conferences together and producing their “skeptics”-related podcast together with co-host Blake Smith. Although Radford and Stollznnow communicated regarding continuing their affair, they had no further sexual encounters.

16. In early 2013, Stollznnow became angered at Radford after he confronted her about her failure to do her share of the work involved in producing their “Monster Talk” podcast. She may also have perceived Radford as a competitor in the Skeptics sub-culture and/or may have been concerned about having conducted an affair with him during her relationship with her current husband. Whatever may have been her motive or combination of motives, she set out to grievously harm Radford. She has apparently inflicted harm on others who have angered her, even including her current husband. Her conduct toward her husband, for example, is the topic

of Arvada, Colorado police report No. OCA 2010-013839, which describes an extraordinary series of assaults and batteries on her husband and his property after she became angered by what she believed to be evidence of a past relationship between her now-husband and another woman.

17. In Radford's case, when Stollznaw became angry at him for whatever reasons, she determined to harm him by communicating to friends and colleagues of hers and Radford's, to Radford's employer and to prominent bloggers and others, that he had for years made inappropriate advances, sexually harassed and even sexually assaulted her. In addition, Stollznaw used her high-profile platform as a guest blogger on the Scientific American web site to repeat her defamatory statements about him, including that he had physically and sexually assaulted her. Stollznaw also contacted the presidents of two prominent skeptical conferences at which Radford had been a frequent past guest speaker to try to convince them to ban him from their events under the pretext of "warning" or protecting female attendees from him.

18. The defamatory communication to Radford's employer, CFI, resulted in a lengthy investigation. Although CFI found Stollznaw's allegations regarding Radford to be almost entirely unsubstantiated, it concluded for example that Radford had sent her "inappropriate" emails after their relationship ended, and suspended Radford for two weeks without pay.

19. CFI's determination that Radford had sent Stollznaw "inappropriate" emails, however, only occurred because Stollznaw provided CFI's investigator with what she correctly identified as emails that Radford had sent to her, but she altered their dates to make it appear that Radford had sent them two years later than he had. Stollznaw's purpose was to persuade CFI's investigator that Radford had been sexually harassing her "for years," and she did so by falsifying the dates on the emails to make it appear that Radford had sent them in 2012, after their sexual relationship was over, rather than 2010, when Radford had actually sent them,

during their sexual relationship. For example, Stollznaw provided a document to CFI's investigator in which she quoted a July 26, 2010 email from Radford in which he wrote, "Just got back from a quick jog and for some reason I wondered: Do you really feel that you have more in common with Baxter than with me?" In providing this e-mail excerpt, however, Stollznaw altered the date to make it appear that Radford had sent it on July 26, 2012, two years after their last sexual encounter and after her marriage to Baxter. Stollznaw falsified at least a half-dozen such messages to wrongly incriminate Radford. The only other two allegations that CFI found to have any credibility were Radford's suggestion that he and Stollznaw have sex in Stollznaw's Las Vegas hotel (described above) and Stollznaw's accusation that Radford had momentarily blocked Stollznaw's exit from a room at a conference. As to the latter, Stollznaw claimed, falsely, that Radford had been attempting to kiss her. In fact, Radford stood for a few seconds in front of Stollznaw during a brief argument they were having.

20. To the extent that CFI found that any of Stollznaw's allegations against Radford had any basis, CFI's conclusions were based upon false, defamatory and malicious statements by Stollznaw which she intended to mislead CFI and its investigator, and through which she did fraudulently mislead CFI and its investigator.

21. Once CFI had largely rejected Stollznaw's allegations against Radford, and had "only" suspended Radford for two weeks, Stollznaw went public with her false allegations. On August 6, 2013, Stollznaw published a "guest blog" on the "Scientific American Mind" web site. She titled her article "I'm Sick of Talking About Sexual Harassment!" In it Stollznaw told of an unnamed "predator who collects girls of a certain 'type'[and whose] targets are chubby, shy, lonely, and insecure." According to Stollznaw's post, this man became obsessed with her, stalked and harassed her despite "repeated requests for his personal communication to cease...



from late 2009 onward.” This person “took every opportunity to place [her] in a vulnerable position,” and “[t]his is where the psychological abuse turned physical and he sexually assaulted me on several occasions.” Within hours of this posting, Radford began to get abusive and harassing e-mails and communications from people who read her blog and commentary about it. If there were any doubt about the identity of the man to whom she was referring, she made sure that it was known by confirming to several prominent bloggers that Radford was the person she was accusing. Indeed, several of Stollznów’s friends active on social media sites soon made sure that Radford was named; within hours the following message was sent via Twitter: “FYI, Karen Stollznów’s sexual harasser is Ben Radford. Someone had to say it,” along with a link to Stollznów’s blog. This was retweeted 32 times to nearly 50,000 people. Other writers, including prominent Slate.com blogger Amanda Marcotte, repeated Stollznów’s claims; the following day the Al Jazeera web site, among others, featured a blog about Stollznów’s claims.

22. The result of Stollznów’s accusations has been that Radford’s reputation in the subculture in which he makes his living, by writing, speaking and broadcasting, is irreparably harmed if not ruined. He has been attacked through internet postings, blogs and web sites, and even placed on an internet list of “sexual predators” on the basis of Stollznów’s false accusations.

23. Stollznów’s accusations against Radford are entirely false as she unquestionably knows. For Radford, who has never stalked, harassed or assaulted any woman, before or since, Stollznów’s false accusations have been enormously humiliating in addition to causing Radford great professional harm.

**Nature And Course Of The Relationship  
Between Radford And Stollznaw**

24. Radford and Stollznaw became acquainted with each other when they first met in September 2008 at a conference in Atlanta, Georgia.

25. The romantic nature of their relationship developed in November, 2008, when on the 14th, Stollznaw flew to Albuquerque for a three-day weekend, during which Stollznaw and Radford engaged in sex. In order to assist Stollznaw's career, Radford arranged for her to appear as a guest on a radio show in Albuquerque.

26. Over the course of the next year and a half, Radford and Stollznaw, who were both unmarried, met sporadically and engaged in sex. Because Radford and Stollznaw lived in different states and communicated primarily by e-mail, the nature of their relationship is well documented in written correspondence. Their emails to each other, far from reflecting any sort of stalking, harassment, or abuse of Stollznaw by Radford, reflect mutual engagement, romantic, friendly, and sexual attachment. While Radford has numerous emails that, together, provide a fairly full picture of their relationship, some examples suffice to demonstrate how outrageously false Stollznaw's accusations of "sexual harassment," "sexual assault," and "predation" are:

a. On November 26, 2008, after her long weekend with Radford in New Mexico, Stollznaw emailed Radford, referring to herself as "a good lay." Many more friendly, romantic emails between Radford and Stollznaw ensued.

b. On July 21, 2009 Stollznaw emailed Radford to say, "Ben, let's go away together somewhere. Let's do an investigation somewhere bizarre and have a crazy couple of days tackling local lore and our evenings tangled in each other. I miss your touch, and your smell, and your taste, and the sound of your voice in my ear. I miss you. Maybe in October if our schedules permit?"

c. On August 24, 2009, Stollznaw emailed Radford referencing oral sex and jealousy over Radford's contact with other women. The issue of sexual exclusivity between Radford and Stollznaw had been neither raised nor addressed; both had other

lovers throughout this time, and Radford made it clear early on that he was not available for a committed, long-distance, long-term relationship with Stollznaw.

d. On September 17, 2009, Stollznaw sent a Facebook email to a woman friend of Radford's in which she stated: "Thanks for admitting that you still do sleep with Ben, when he'll have you, and that you're pissed off because now you know he wants to ["f\_\_\_"] me." At about the same time, Stollznaw briefly ended her relationship with Radford, claiming that she wanted a more serious relationship with him and that he did not reciprocate her feelings. Radford, upset that Stollznaw had contacted other women instead of simply asking him about them (in which even he would have answered truthfully), agreed that they should take a break.

e. Stollznaw's attitude toward her relationship with Radford shifted and changed unpredictably over the ensuing months, as it did later. The documentary evidence clearly demonstrates that Stollznaw's claim of having ceased communications with Radford in late 2009 (as a result of his alleged abusive behavior) is false. In fact a forensic data analysis revealed many hundreds of e-mails from Stollznaw to Radford between 2009 and 2012.

f. On December 19, 2009, in a typical friendly exchange, Stollznaw e-mailed Radford to thank him for a Christmas gift: "Hi Ben, I received your presents - thank you very much. I hope you have a lovely Christmas and all the best for 2010."

g. By early 2010, Stollznaw made it clear to Radford that she was upset that he did not appear to be interested in a long-term relationship with her, and wrote him on January 13, 2010: "You told me outright that you weren't interested in anything more than a fling, a holiday."

h. On March 1, 2010, in a friendly exchange, Stollznaw thanked Radford for a gift and commented: "As for what's going on in my head, I think I was pretty upfront about that until the point where I realized my feelings weren't reciprocated."

i. On March 31, 2010, Radford emailed Stollznaw: "Dear Karen, Congratulations on your upcoming San Francisco conference, it looks like it will be a great time. As it happens, I will be in SF from April 15 to 18 or so. I'm giving a talk on the 16th, and I have a few other plans, but I should have some free time during my stay." Radford invited Stollznaw to have dinner with him, and Stollznaw replied the same day, "Hi Ben, I'd still be willing to attend the Friday night dinner with you, if you haven't already found another guest."

j. On April 11, 2010, before the San Francisco meeting for dinner, Stollznow emailed Radford to ask if she could stay with him in San Francisco [even though she lived nearby, in the Bay Area]. She went on: "I'm not sure what your hotel arrangements are for Friday night, but if we're to hang out on Saturday, and I'm to have a few drinks during dinner, would it be possible for me to crash with you in the city? If that's not too presumptuous of me to ask. Karen." In follow-up e-mails the same day, Stollznow offered to make reservations for a hotel for the two of them: "Trudging home a little drunk might not be polite as far as your uncle or my roommate [a person she later claimed was her husband] are concerned, so how about I find a room in SF? Say the word, and I'll check out Hotwire and reserve a room close to the restaurant.... At any rate, we can hang out Friday night and Saturday itself, if you like," and finally "I booked a room at a joint called Club Quarters in SF, right near the Embarcadero. It might be a few blocks from the restaurant, but I'm sure we can walk it or cab it there. Karen."

k. On April 16, 2010, Radford and Stollznow met in San Francisco, went to the hotel she had booked for the two of them, then to dinner and then back to the hotel. She informed Radford that she was engaged to be married and explained to Radford that she wanted to have sex with him anyway because she and her fiancé had an "open relationship." Radford and Stollznow engaged in a sexual encounter over the course of the night and Radford left in the morning to visit his relatives.

l. The foregoing events occurred during a period of time that Stollznow would later falsely assert to have been one during which Radford sexually harassed and assaulted her. But all of the foregoing events are documented not only by Stollznow's and Radford's emails, but also in photographs. It is a fair measure of Stollznow's later-developed malice toward Radford that she would encourage and facilitate sex with him and then, two years afterwards, accuse him of having "sexually assaulted" her during the very period in which she was enthusiastically arranging trysts with him.

m. On April 18, 2010, Stollznow e-mailed Radford to thank him for the time she had had with him in San Francisco, for his support and friendship, and apologized for involving him in her "bizarre situation" [presumably a reference to her soliciting sex from him even though she was engaged]: "I apologise for dragging you into my bizarre situation, but I think we're all pleased with the outcome...Thank you most of all for being a good friend to me, and for your sage advice and sensitivity regarding my situation, career, and our past. I'm glad we sorted out our differences, and I promise I won't be a stranger from now on as we all move forward."

n. On April 19, 2010, Stollznow e-mailed Radford: "Thank you also for what you said about our friendship; happily, I feel the same way....I enjoy our little, tight-knit

community, but I feel especially close to you. Yes, let's be sure to chat every week or so. Of course I have time for you."

o. On July 11, 2010, at "The Amazing Meeting" (TAM) conference in Las Vegas at the Southpoint Casino, Radford momentarily stepped in front of Karen during a non-hostile argument as she was leaving a conference room. There was no physical contact that might be reasonably considered abusive or threatening, and their relationship was such that stepping in front of each other during an argument or on any other occasion would be a matter of no notice or consequence on either of their parts. Several days later Radford met Karen in her room and suggested sex, which Stollznaw declined for reasons unrelated to their relationship. The encounter was friendly and uneventful. Radford and Stollznaw parted company and remained on friendly terms. Years later Stollznaw would assert, in the course of her defamatory and false statements about Radford, that she had had to threaten to call hotel security in order to get him to leave her hotel room. Like all the other stalking, harassment, and abuse that Stollznaw claimed to have suffered at Radford's hand between 2009 and 2012, she made no such accusation to anyone until 2013 when she became angry at him for reasons not entirely clear.

p. On July 18, 2010—one week after the meeting in her hotel room which Stollznaw would later falsely claim to have involved a "sexual assault"—Radford and Stollznaw had the following email exchange: Radford: "Hello Beautiful Hope you have a productive Sunday. Try to get some relaxing time in." Stollznaw replied: "Good morning to you too beautiful! My day will be spent writing about TAM and recording a podcast episode! I'll try to get in some relaxation too. Have a wonderful day!" Following the TAM conference in Las Vegas, Radford and Stollznaw had a continuing dialog about their relationship, including extended discussions of the nature of their feelings for each other, Stollznaw's feelings toward her fiancé/husband, Baxter and the reasons why Stollznaw's and Radford's relationship had not become more than an extended fling. In none of those emails did Stollznaw suggest that Radford had been guilty of any sort of sexual or other misbehavior; simply that their relationship had not worked out.

q. On September 18, 2010 Stollznaw wrote to Radford, "I'm always happy to work with you, investigate with you, and collaborate with you. Sex with each other just isn't a good idea anymore." Radford agreed, and wished Stollznaw the "best of luck with Baxter," and stated that he was dating someone new. Stollznaw replied, "If you're truly developing a new relationship, I'm happy for you"—but then she offered to continue their sexual relationship: "However, if you're ever willing to have an affair..." Radford replied, "I don't have affairs, I don't cheat on my partners. If I'm committed, I'm committed. If I'm not, I'm not. You should know that," to which Stollznaw responded, "Well, that's not true, but anyway, I offered. Never again." With this

correspondence Radford assumed that their sexual relationship had come to a mutually agreed end, and he made no further romantic or sexual overtures toward Stollznaw.

r. On the evening of September 26, 2010, when Radford was in Kentucky, Stollznaw called him to seek his advice about her rocky relationship with the man she'd been dating, Matthew Baxter—including, she told him, that Baxter had broken her wrist during a recent argument. Radford, who volunteers at a local domestic violence shelter, recognized the potential danger and advised her not to stay in an abusive situation. He also offered his home as a temporary place for Stollznaw to seek refuge if she was in danger or needed to get away from Baxter to clear her head and weigh her options. At the time, Radford did not have the information contained in the Arvada, Colorado police report, above, which describes Stollznaw as the aggressor in that incident—and that she, not Baxter—had in fact been arrested on domestic violence charges.

s. On September 26, 2010, following her phone call about the abuse she claimed to have suffered at the hands of Matthew Baxter, Stollznaw emailed Radford to discuss coming to visit him for a week at his home in New Mexico (though the plans later fell through): “Hi Ben, Thanks for the chat tonight. You made a lot of sense. Should your calendar be free, the dates around Tue. Oct 12 to the following Tue. are reasonably priced for me, although I understand if this is too long a period of time. Please think on it when you can! Have a great trip in KY, and thanks again for being so sweet to me.”

t. In early October 2010, less than three months after Stollznaw now claims Radford sexually assaulted her, Stollznaw sent Radford a birthday card, with a note ending, “Lots of love, Karen, xxx/ooo [hugs and kisses].” Stollznaw included a birthday gift for Radford—a book on pornography.

27. Thus, even though the events during the year 2010 took place as described, and even though Stollznaw and Radford had the communications described above—along with many others in a similar vein—Stollznaw later publicly accused Radford of having been engaged in sexual harassment of her and of “sexual assault” during the same period that she was arranging for sex with him, inviting him to engage in sexual liaisons with her, thanking him for his kindness, seeking his counsel and support based on her claims of physical abuse, and sending him cards and gifts of a sexual nature. The fact that Stollznaw would make such accusations is, again, a measure of her malice.

28. On January 10, 2011, Radford e-mailed Stollznaw a friendly note to let her know that he had referenced a column she'd written in Skeptical Inquirer magazine. She replied, "Nice. Thank you, baby!"

29. On April 26, 2011, Radford e-mailed a photograph taken of him and Stollznaw outside the Club Quarters hotel in San Francisco, where they had spent the night together a year earlier. Stollznaw's response was, "Thanks for the pic. We really do look cute in it! Karen."

30. On June 1, 2011, Stollznaw arranged a conference call among herself, her (now) husband Matthew Baxter and Radford. During the conference call, to Radford's mystification, Stollznaw told him to stop sexually harassing her or she would contact his employer about the matter. Radford replied that he had no idea what she was talking about, and that she had never before characterized anything that they had done together as any sort of sexual harassment by him. Stollznaw made no reference to any stalking incidents she would later purport to describe in her 2013 blog for Scientific American mind, nor any physical abuse, though she did reference the brief July 2010 Las Vegas hotel room encounter described earlier, during which Radford had suggested sex and Stollznaw had declined.

31. In mid-June, 2011, Radford informed MonsterTalk co-host Blake Smith that Radford was uncomfortable being on the same podcasts as Stollznaw because she had recently threatened to accuse him of sexual harassment. Smith informed Radford that this was the first time he'd heard of such an accusation, and that Stollznaw had never expressed any such concern to him. Radford requested that the podcast shows be split up such that he and Stollznaw did not appear opposite Smith in the same episodes, for fear that Stollznaw would intentionally misconstrue or misinterpret an innocent comment or innuendo from Radford as a sexual

comment directed at her. Smith agreed, and from then on (until June 2013 when Radford was forced to quit the show by CFI due to Stollznnow's accusations) the shows alternated co-hosts.

32. From mid-2011 onward, communication between Radford and Stollznnow became much less frequent and far more formal, the content almost exclusively professional (mostly podcast-related) topics, with occasional friendly exchanges. By late 2012 there was very little communication between the two at all, and in fact Stollznnow would often completely ignore Radford's rare e-mails, despite their entirely professional, work-related content.

33. On October 29, 2011, Stollznnow and Radford met at a CFI conference in New Orleans. They conversed briefly and privately in the hotel lobby, and Stollznnow told Radford she was doing well, working things out with her fiancée, and looking for a better job. During the days of the conference, Radford and Stollznnow, along with Matthew Baxter and Blake Smith, went on a tour together of the Honey Island Swamp. Throughout the days of the conference and the tour, Stollznnow was friendly, and neither she nor Matthew Baxter intimated anything about sexual harassment. All present were friendly and congenial and appeared to enjoy each others' company.

34. Stollznnow's and Radford's friendship continued uneventfully. On December 13, 2011 Stollznnow e-mailed Radford to thank him for texting her and calling her: "Hey Ben, Thanks for the text and the call. I hope the Sylvia Browne protest went well. I'm sorry I missed it! I hope you write about it for one of your columns. In fact, I'm writing about her now!... Have a great weekend." As 2011 Christmas gifts to both Stollznnow and Smith to thank them for their work on the MonsterTalk podcast, Radford sent each of them an identical framed 8 X 10 monster-related photographic print; this was one of a dozen or so gifts or birthday/holiday cards sent to



Stollznaw out of friendship and generosity over the years—ones that Stollznaw thanked Radford for at the time, but that she would later mischaracterize as harassing or abusive correspondence.

35. During the first half of January, Radford and Stollznaw exchanged occasional chatty emails regarding inconsequential matters (projects, cat photos, articles, columns, etc.), thanks for gifts, etc. On January 19, 2012, Stollznaw sought and received assistance from Radford in connection with an article she was writing, and Radford offered to help her with the indexing of a book she was writing, to which she replied with thanks.

36. On July 12 or 13, 2012, Radford, Stollznaw, Baxter, Blake Smith and three others appeared together on a TAM conference panel to discuss “Investigative Methods for the Skeptic.” Despite the fact that all of them were on a stage in front of hundreds of people, Stollznaw would later claim, falsely, that Radford sexually harassed her during the panel discussion, which was videotaped and is available on YouTube and shows nothing of the sort.

37. Throughout the remainder of 2012, Radford’s relationship with Stollznaw remained uneventful and cordial. On August 11, 2012, for example, Stollznaw e-mailed Radford to thank him for a birthday card he had sent (to her among others of his friends): “Hi Ben, I just received your birthday card. Thanks for that, it certainly made me laugh! Have a great weekend. Karen.”

38. Both Stollznaw and Radford noted the heavy production work burden that podcast co-host Blake Smith shouldered on the show, and in a January 10, 2013 email to Smith and Stollznaw, Radford asked for more professional cooperation and communication from Stollznaw: “MonsterTalk requires a significant time commitment from everyone, and all of us are extremely busy. Blake has shouldered the greatest load, taking on the difficult and time-consuming production duties, in addition to doing research, helping coordinate guests, writing

interview questions, etc. Since MonsterTalk began three years ago, the duties of tracking down and inviting guests have been saddled almost exclusively on Blake and myself. To be honest, I can't think of a single guest that Karen has arranged to be on the show (though there might be one or two I'm forgetting). This is not a simple task, and can take weeks of research, follow-up e-mails, discussing schedules, and more. There's a lot more involved than just being available for an hour and reading & writing questions. While not diminishing Karen's contribution to the podcast, I think we can all agree that by any standard, the workload is not being shared equally among the three of us. I'd put it at about 60% Blake, 30% me, and 10% Karen, to be honest. The issue has been exacerbated by Karen's behavior and disrespect toward me recently; about three weeks ago I returned from the JREF cruise to find that Karen had de-Friended me on Facebook and changed her e-mail. I honestly have no idea what, if anything, triggered that behavior. I've had very little contact with Karen outside of the podcast in months and years."

39. Smith responded in part, "Yes, Karen does not contribute as much to the preparation of the show. I'm sure she's aware of that..." Radford replied, "All I did was say something that is true, and that we all know is true, but never talk about: that Karen does far less work than either one of us on the podcast, and it's not fair. This isn't about any personality conflict between Karen and I; it's about her not contributing equally to the show. Bringing that up is not me being an asshole. The classy response from Karen would be: 'You're right, sorry I haven't been doing as much as I should in terms of research and booking guests, I'll do more in the future.' That's all I'm looking for." Stollznow never responded to Radford's e-mail or a follow-up e-mail requesting a response, but several weeks later she launched her false claims of Radford's sexual harassment.

40. On February 25, 2013, Radford's employer, CFI, notified him that Stollznaw had accused him of sexual harassment and requested that CFI discipline him. Stollznaw apparently had not accused him of physical or sexual assault, as she did later on the Scientific American guest blog. There followed a six-month investigation conducted by an outside investigator hired by CFI. In addition to Stollznaw's fabrication of general allegations of harassment, Radford later learned that Stollznaw altered at least six documents to support her fabricated allegations, including falsifying the dates of e-mail exchanges to make it appear that Radford had been pestering her with "incessant communication of a sexual nature" after she had supposedly asked him to stop communicating with her. Stollznaw also apparently falsely stated to the investigator that she and Radford had not been in a sexual relationship when he came to her hotel room in Las Vegas in July of 2010, where he suggested sex, and that, accordingly, his request was harassing rather than an inconsequential exchange between two people who had had recent sexual liaisons and were together in a hotel room again. In addition, Stollznaw falsely told the investigator that Radford had blocked her path in an attempt to kiss her at the same conference (Radford acknowledges momentarily stepping in front of her during an argument).

41. On June 26, 2013, CFI wrote to Stollznaw and Radford, indicating that although many of Stollznaw's allegations were not credited, CFI had concluded that Radford had written "inappropriate" emails, had inappropriately blocked Stollznaw from leaving a conference room and had inappropriately requested sex in the Las Vegas hotel room. While CFI's conclusions were surprising, given its rejection of most of Stollznaw's allegations, it was clear that Stollznaw, by falsifying the dates on the supposedly "inappropriate" emails, and by fabricating the circumstances associated with the events at the conference, had deceived CFI's investigator,

resulting in CFI's findings, which in turn resulted in the suspension of Radford, without pay, for two weeks.

42. Apparently unhappy that she had not caused greater harm to Radford, Stollznaw attempted to interfere with Radford's professional activities and to harm his reputation. In the course of each effort, Stollznaw falsely and maliciously informed members of the community that Radford had sexually assaulted and harassed her and requested that he be banned from various events. Her efforts caused Radford severe reputational injury, emotional distress and loss of income.

43. On August 6, 2013, Stollznaw published a "guest blog" on the Scientific American Mind web site. She titled it "I'm Sick of Talking About Sexual Harassment." In it Stollznaw describes an unnamed "predator who collects girls of a certain 'type'[and whose] targets are chubby, shy, lonely, and insecure." This man became obsessed with Stollznaw, she wrote, and stalked and harassed her despite "repeated requests for his personal communication to cease... from late 2009 onward." This person "took every opportunity to place [Stollznaw] in a vulnerable position," and "This is where the psychological abuse turned physical and he sexually assaulted me on several occasions." In other words, Stollznaw was maliciously recasting her and Radford's sexual history, which she had initiated and continued over the course of three years, as a series of harassing and sexually predatory acts by Radford.

44. Although Stollznaw did not identify Radford by name in her Scientific American guest blog, she promptly informed colleagues within the skeptics movement that the person to whom she had referred was the plaintiff, Ben Radford.

45. Within hours of Stollznaw's posting, Radford began to receive abusive and harassing e-mails and communications from people who read her blog and the associated

commentary from other readers. Blake Smith, Radford's one-time friend, collaborator, and podcast co-host soon posted two public statements on the MonsterTalk Facebook page in which he stated that he believed and supported Stollznnow's accusations against Radford, notifying many podcast listeners for the first time about the sexual harassment claims.

46. On August 7, Stollznnow provided Carry Poppy, a prominent skeptical blogger and podcast co-host, with copies of her correspondence between the president of the skeptical organization The James Randi Educational Foundation and its board, which Poppy then used in a lengthy blog titled "Carrie Poppy Tells All." The blog states in part: "Dr. Stollznnow says that she was assaulted at the James Randi Educational Foundation's (JREF) annual conference, The Amazing Meeting (TAM) on three separate occasions. Dr. Stollznnow is a research fellow for the JREF, and is a respected speaker at TAM. The person who she says assaulted her is Ben Radford, another speaker at TAM..." Poppy's blog also published a July 20, 2013 letter to the JREF board in which Stollznnow wrote, "At TAM 2010 I was sexually assaulted and harassed by another speaker by the name of Benjamin Radford. I was also sexually harassed by him at TAM 2012." Stollznnow further described her purpose: "My request to the Board is that the JREF [make] a firm commitment to not invite this predator to any future JREF function." Thus Stollznnow was using her malicious fabrications in an attempt to end Radford's relationship with the people and institutions prominently associated with the skeptics movement, thereby poisoning his reputation and ruining his career.

47. On August 7, 2013, blogger P.Z. Myers published Stollznnow's claims in Poppy's blog, and in which Stollznnow's falsehoods were repeated and Radford was named. Eventually, the malicious falsehoods about Radford became supposed evidence of "sexism, misogyny and disrespect to women by atheists and 'skeptics.'"

48. On August 12, 2013, Joe Anderson, a close friend of Stollznov's, wrote a blog titled "Shame on you, Ben," in which he supported Stollznov's claims and in reference to Radford wrote, "It causes me great conflict in that I wonder how I could trust someone who appears to have such a huge character flaw that I missed....I am not in a position of having to choose whether or not to believe Karen. I was there as much of it occurred. I saw... the emails, texts, cards and gifts and the multiple requests by both her and her husband that they stop." Numerous other tweets, blog posts, and comments excoriated Radford, based on Stollznov's false accusations.

49. Stollznov's malicious fabrications about Radford have had a devastating effect on Radford's reputation, as Stollznov unquestionably intended.

50. Stollznov's malicious and false statements regarding Radford are accusations of grave criminal misconduct by Radford including, but not limited to, sexual assault. As such, damages are presumed.

51. Radford is entitled to recover from Stollznov an amount reasonably calculated to compensate Radford for the actual and presumed harm to his reputation and to his ability to earn a living in his chosen reputation, in addition to emotional distress damages.

52. The amount of Radford's damages will be established at trial.

53. Because of the intentional and malicious nature of Stollznov's defamatory statements and publications regarding Radford, Radford is entitled to recover punitive damages from her in an amount reasonably calculated to deter her from ever engaging in such conduct again, whether in relation to Radford or anyone else. Radford reasonably estimates the amount of punitive damages necessary to accomplish this at ten fold the amount of actual damages allowable under Colorado law.

**COUNT I**  
**Defamation (Libel Per Se)**

54. Plaintiff Radford incorporates all preceding allegations as though the same were fully set forth.

55. Defendant Stollznnow made her false statements about Radford knowing that they were false and with the intent to harm him. Accordingly, she is guilty of constitutional malice in the context of the law of defamation and it is immaterial whether Radford is determined to be a public or non-public figure for purposes of this law suit.

56. By falsely informing Radford's employer that he had sexually harassed and assaulted her, Stollznnow committed libel *per se*.

57. By informing colleagues and bloggers within the skeptics movement that her statements on her guest blog concerning an unnamed colleague were about Radford, Stollznnow committed libel *per se*.

58. Plaintiff is entitled to recover actual and punitive damages from Stollznnow in an amount that Plaintiff Radford reasonably estimates to be in the millions of dollars.

**COUNT II**  
**Libel Per Se or Per Quod**

59. Plaintiff incorporates all preceding allegations as though fully set forth.

60. By publishing her "guest blog" on the Scientific American website, without naming Radford, but with knowledge that members of the skeptics movement would know of whom she was speaking, Stollznnow committed libel *per quod*.

61. Alternatively, because of the ready ability of Stollznnow's and Radford's colleagues to know of whom she was speaking, coupled with her efforts to make sure they learned of whom she was speaking, Stollznnow committed libel *per se*.

62. By libeling the Plaintiff in this fashion, Stollznnow damaged Radford by harming his reputation in the skeptics community, where he makes his living, in amounts yet to be determined.

**COUNT III**  
**Fraud**

63. Plaintiff Radford incorporates all preceding allegations as though the same were fully set forth.

64. Defendant Stollznnow engaged in actionable fraud when she maliciously and falsely told Radford's employer, CFI, that Radford had sexually harassed and assaulted her. In doing so, she intended to mislead and did mislead CFI, causing it to investigate Radford.

65. In the course of CFI's investigation of Radford, Stollznnow maliciously and intentionally provided false information to CFI's investigator, including, without limitation, providing CFI with numerous fraudulently-dated emails to make it appear to CFI that Radford had been sending Stollznnow "harassing" emails in 2012 when, in fact, he had sent the emails in 2009 and 2010 in the course of a sexual relationship with Stollznnow that she had initiated and perpetuated.

66. CFI and its investigator relied on the falsified documents and fraudulent statements provided to them by Stollznnow.

67. Stollznnow's purpose in providing false and fraudulent information to CFI was to harm Radford, a purpose which she accomplished.

68. Radford suffered emotional, reputational and economic harm as a result of the fraud Stollznnow perpetrated on CFI.



69. Radford is entitled to recover his actual damages in an amount to be proved at trial and an additional award of punitive damages reasonably calculated to deter such conduct in future, caused by Stollznnow's fraud.

**COUNT IV**  
**Interference with beneficial contractual relations**

70. Plaintiff Radford incorporates by reference all preceding allegations as though fully set forth.

71. During the year 2013, defendant Stollznnow contacted various institutions associated with the skeptics movement, including, as described above, the board of JREF and the organizers of the TAM conference to persuade them to no longer do business with plaintiff Radford. To attempt to persuade them to cease doing business with Radford, Stollznnow used the false, malicious and defamatory statements described above, variously accusing Radford of sexual predation, sexual assault, sexual harassment, etc.

72. On information and belief, Stollznnow has interfered with Radford's relationship with other persons and organizations for the same reasons and with the same approaches.

73. Stollznnow's efforts in these regards constitute the tort of unlawful or malicious interference with beneficial contractual relations and Radford is entitled to be compensated, in an amount to be determined at trial, for any loss of business or opportunity as a result of Stollznnow's malicious actions.

74. Because of the malicious and intentional nature of Stollznnow's actions, Radford is entitled to recover an amount of punitive damages from her that is reasonably calculated to deter her from engaging in such conduct in future, whether directed at Radford or anyone else.

**COUNT V**  
**Intentional Infliction Of Emotional Distress**

75. Plaintiff incorporates all previous allegations as though fully set forth

76. In fabricating and publishing the false statements described above, defendant Stollznaw engaged in extreme and outrageous conduct.

77. In engaging in the conduct described in this complaint, Stollznaw did so recklessly or with the intent of causing the Plaintiff severe emotional distress.

78. As a consequence of defendant's conduct Plaintiff Radford has suffered extreme emotional distress and continues to suffer extreme emotional distress for which, under applicable law, he is entitled to recover damages.

WHEREFORE, Plaintiff Benjamin Radford seeks judgment and damages, as determined at trial, against Stollznaw. Radford, in addition, seeks an order awarding him his reasonable costs incurred in bringing and prosecuting this law suit.

Respectfully submitted,

FREEDMAN BOYD HOLLANDER GOLDBERG  
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**CERTIFICATE OF SERVICE**

I CERTIFY that on the 17<sup>th</sup> day of November, 2014, I filed the foregoing electronically through the CM/ECF system, which caused the parties or counsel of record to be served electronically, as more fully reflected on the Notice of Electronic Filing.

/s/ John W. Boyd  
John W. Boyd