

STATE OF TEXAS §
 §
 HARRIS COUNTY §

AFFIDAVIT OF KRISTEN CREIGHTON

Before me, the undersigned notary, on this day personally appeared Kristen Creighton, the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified:

“My name is Kristen Creighton. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

In 2009, I sued Nik Richie and Dirty World, LLC for invasion of privacy and intentional infliction of emotional distress after they posted information about my diagnosed medical condition of herpes on thedirty.com website. Nik Richie and Dirty World, LLC never responded to the lawsuit and in October 2009, I was granted a judgment against both defendants totaling 1.5 million dollars.

On May 10, 2010, I saw a post on thedirty.com from Nik Richie again publicizing that I have herpes and saying that he was going to make me ‘the face of herpes in America.’ I couldn’t believe it. I was shocked, scared and extremely humiliated and immediately contacted my lawyer, Chris Bell, to let him know what had happened. Since then, there has been one post after another about me on thedirty.com. Almost all of them say that I have herpes. Some of them feature photographs and put my face on other people’s bodies. This has gone on for days and based on what Nik Richie has said on the website, it doesn’t appear that he will stop.

I am feeling incredibly upset, paranoid, fearful and anxious and as if I might have a nervous breakdown. I have no idea what he is going to put up next and I have been getting hundreds of harassing email messages, not to mention the hundreds of comments that appear on thedirty.com about me. Harassing phone calls are also being made to my place of employment now that that information has appeared on thedirty.com.

I have suffered from depression and anxiety in the past and have had to seek professional help for it. I have been prescribed medication for anxiety to take on an as needed basis. Since the first posting on thedirty.com, I have had to take the medication routinely. I feel all of the symptoms of depression coming back: an inability to focus at work (I have already missed two days since the posting), deep sadness, anxiety and fear.

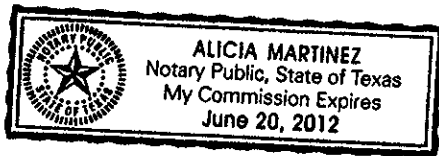
I am engaged to be married and have been looking forward to starting a new life. Now all I can think about is how Nik Richie and his website are doing everything they can to destroy me. I am embarrassed about my medical condition just like anyone would be. I have gone to great lengths

to protect the information and have only shared it with immediate family members and those who needed to know. That's why I went to court the first time, because I couldn't believe someone would expose such private information. Now I believe I am being retaliated against because I was willing to stand up for my rights.

I cannot live this way, wondering what Nik Richie and thedirty.com are going to say about me next. I am a private citizen and have done my best to mind my own business. He has no right to expose my medical condition and humiliate me day after day."

Kristen Creighton
Kristen Creighton

Sworn to and subscribed before me by Kristen Creighton on 5-13-10, 2010.



Alicia Martinez
Notary Public in and for
the State of Texas

My commission expires: