

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

KENNETH CHOOKHACHIAN,

*Plaintiff,*

- against -

KERRY ANNE NORAH HAMILTON  
(a/k/a “Hekate’s Daughter,” a/k/a “Azria”),

*Defendant.*

Index No.:

Date Filed:

**SUMMONS**

Plaintiff designates New York County as the place of trial.

The basis of the venue is:

Plaintiff’s residence: 460 Grand Street #22H  
New York, NY 10002 (CPLR § 503)

TO: Kerry Anne Norah Hamilton (a/k/a “Hekate’s Daughter”)  
14th floor – 20 Adelaide  
Street East  
Toronto, ON  
Canada / M5C 2T6

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff’s Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

**The basis of the venue designated is:** Plaintiff’s residence in New York County, pursuant to CPLR § 503(a).

Dated: New York, New York  
April 7, 2026

MAXWELL & VIVIANI, PLLC

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**SUPREME COURT OF THE STATE OF NEW YORK  
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KENNETH CHOOKHACHIAN,

*Plaintiff,*

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KERRY ANNE NORAH HAMILTON  
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**VERIFIED COMPLAINT  
JURY TRIAL DEMANDED**

Plaintiff, **KENNETH CHOOKHACHIAN** (hereinafter referred to as “Plaintiff,” “Mr. Chookhachian,” or “Hussy”), by and through his attorney, **ROBERT MAXWELL, ESQ.**, complaining of the Defendant **KERRY ANNE NORAH HAMILTON** (hereinafter referred to as “Defendant,” “Ms. Hamilton,” “Hekate’s Daughter,” or “Azria”), respectfully alleges as follows:

**NATURE OF THE ACTION**

1. This is an action to recover damages for a malicious, coordinated, and dangerous campaign of defamation, intentional infliction of emotional distress, and prima facie tort orchestrated by the Defendant against the Plaintiff.

2. Specifically, this action arises from Defendant’s active participation in a cross-border cyber-harassment network that purposefully targets a New York resident and his New York-based business. While operating from Canada, Defendant has intentionally directed her tortious conduct at New York to cause severe financial and reputational harm to the Plaintiff within this County.

3. On July 14, 2023, the Plaintiff was subjected to a life-threatening “swatting” incident (documented in NYPD Complaint Report #2023-007-003476). Defendant, acting with

malice and intent to harm, publicly mocked this violent emergency, laughing at the risk to Plaintiff's life, and utilized the event to further terrorize the Plaintiff, thereby ratifying and encouraging the extreme conduct.

4. This Complaint specifically seeks damages for the distinct and separate injuries caused by Defendant Hamilton's individual acts, most notably the severe psychological trauma, reputational damage, and specific economic loss resulting directly from her unique and escalating false accusations of "Human Trafficking," "Rape," and "Drugging," as well as her explicit support of the swatting incident.

5. Furthermore, Defendant has engaged in a pattern of tortious activity designed to destroy Plaintiff's livelihood. This pattern includes targeted interference with Plaintiff's business expectancies, the fabrication of false evidence to maliciously terminate Plaintiff's income streams, and the harassment of Plaintiff's New York legal counsel to impede Plaintiff's pursuit of justice.

6. Plaintiff seeks relief pursuant to New York State common and statutory law, including, but not limited to, compensatory and punitive damages, expenses, and reasonable attorneys' fees, based on claims for Defamation, Defamation Per Se, Intentional Infliction of Emotional Distress, and Prima Facie Tort.

#### **PARTIES**

7. Plaintiff, Kenneth Chookhachian, is a resident of the County of New York, State of New York, and a citizen of the United States. Plaintiff is a professional digital content creator.

8. Defendant, Kerry Anne Norah Hamilton, is, upon information and belief, a resident of the City of Mississauga, Province of Ontario, Canada.

### JURISDICTION AND VENUE

9. Jurisdiction and venue are proper in New York County because this Court possesses general subject matter jurisdiction and exercises personal jurisdiction over the non-domiciliary Defendant pursuant to CPLR § 302(a)(1) and (a)(3).

10. First, under CPLR § 302(a)(1), Defendant's contacts with New York are not based merely on Plaintiff's residence, but on Defendant's own suit-related conduct expressly aimed at this forum. Specifically, Defendant:

- a. Utilized interactive commercial platforms (GoFundMe) to launch a fundraising campaign expressly titled "HELP AZRIA BREAK KENNETH," purposefully soliciting funds to finance her harassment of a New York business;
- b. Explicitly targeted Plaintiff's lawful activities in New York to frame them as crimes, broadcasting false statements to a global audience that Plaintiff illegally films in "New York bars" without a license; and
- c. Directly harassed and disparaged Plaintiff's New York-based legal counsel, utilizing interstate communications to actively impede a New York resident's access to the courts. Plaintiff's causes of action, including defamation, arise directly from these New York-directed transactions.

11. Second, under CPLR § 302(a)(3), Defendant committed intentional tortious acts without the State causing severe injury to person and property within the State. Defendant expressly aimed her conduct at New York, expected her acts to have consequences in this State, and derives substantial revenue from international commerce via her monetized media platforms.

12. Additionally, venue is proper pursuant to CPLR § 503(a) because Plaintiff resides in New York County.

### STATEMENT OF FACTS

13. Plaintiff is a digital content creator on social media and streaming platforms, such as Twitter/X, Twitch, and YouTube. Plaintiff uses his digital audiences to make comedy sketches, videos, and livestreams, for which he receives monetary donations, paid subscriptions, and "super chats" from his fans and digital admirers. Plaintiff's business property consists of his standing on streaming platforms and his ability to generate revenue through live broadcasts.

14. Defendant Hamilton has engaged in a distinct, malicious, and ongoing campaign specifically designed to destroy Plaintiff's reputation, severely impact his mental health, and sever his revenue streams through false accusations of heinous felonies.

15. Defendant's defamatory campaign escalated to imputing specific, verifiable criminal acts to Plaintiff.

16. Unlike general reputational harm, Defendant Hamilton has targeted the technical infrastructure and viability of Plaintiff's business. By systematically labeling Plaintiff a "Human Trafficker" and "Rapist" on the very platforms where he operates, Defendant intends to trigger "Terms of Service" violations to result in the permanent suspension ("de-platforming") of Plaintiff's channels and the severing of his revenue streams.

17. On December 22, 2025, Defendant broadcasted a video to a global audience on YouTube, explicitly labeling Plaintiff a "Groomer," a "Rapist," and a "Human Trafficker." In this same video, Defendant falsely stated that Plaintiff engages in illegal activities in New York, claiming: *"It's illegal to film in New York bars without a filming license... He's recording without permission."* Furthermore, Defendant explicitly accused Plaintiff of drugging individuals, stating: *"That man was drugged... That is not drunk, that is drugged,"* and concluded the broadcast by declaring: *"Hussy's a goddamn sex trafficking predatory evil piece of shit."* A true and accurate copy of this video broadcast is attached hereto as **Exhibit A**.

18. Furthering this campaign, on December 29, 2025, Defendant published another video broadcast, falsely accusing Plaintiff of sex trafficking and exploiting individuals for financial gain. Defendant stated: "*He's getting money through memberships to record people against their will... That's where the there you go. Trafficking. Cuz they were using it as something sexual. He was profiting off them.*" A true and accurate copy of this video broadcast is attached hereto as **Exhibit B**.

19. On or about November 28, 2025, Defendant published written posts publicly targeting Plaintiff's fundraising infrastructure and professional integrity, explicitly stating: "*YOU... ARE... A... SCAMMER.*" True and accurate copies of these publications are attached hereto as **Exhibit C**.

20. Plaintiff has never been arrested, charged, or prosecuted for sex trafficking, rape, drugging individuals, or financial fraud in any jurisdiction. Defendant's statements are demonstrably false and constitute defamation *per se*.

21. Defendant's malice and extreme, outrageous conduct extended beyond defamation into the infliction of severe emotional distress.

22. On July 14, 2023, Plaintiff was the victim of a life-threatening "swatting" incident at his New York residence, wherein armed NYPD officers were falsely dispatched to his home. This act is documented in NYPD Complaint Report #2023-007-003476, a copy of which is attached hereto as **Exhibit D**.

23. Rather than condemning this act of terror, Defendant publicly celebrated and mocked the use of "swatting" as a weapon. During a video broadcast, Defendant highlighted a written comment laughing at another victim of this crime, stating: "*LMAOOO CARRIE WHO SWATTED YOU LMAOOOOOOO.*" By reveling in this life-threatening tactic, Defendant intentionally inflicted further psychological trauma upon the Plaintiff, who had recently survived a similar attack. The broadcast also captures Defendant verbally attacking Plaintiff's legal counsel. A true and accurate copy of this video is attached hereto as **Exhibit E**.

24. Defendant's actions are motivated solely by "disinterested malevolence." On November 15, 2025, Defendant launched a fundraising campaign on the commercial platform "GoFundMe" explicitly titled: "HELP AZRIA BREAK KENNETH." A true and accurate copy of this campaign page is attached hereto as **Exhibit F**.

25. The GoFundMe campaign (Exhibit F) serves as irrefutable evidence of Defendant's intent to inflict harm without any legitimate social or economic justification. In the campaign description, Defendant explicitly solicited funds to purchase illegal narcotics to fuel her harassment, stating: "*NEED MORE BLOW... I CAN GO FOR A MONTH STRAIGHT ON PRIMO. JOIN THE GOOD FIGHT BY KEEPING ME HIGH ON LIFE.*" Defendant further admitted: "*My name is Azria and I'm toxic as fuck... These type of people should be distressed.*"

26. In a concerted effort to obstruct justice and impede Plaintiff from exercising his legal rights in New York, Defendant specifically targeted Plaintiff's New York legal counsel. Utilizing the same GoFundMe campaign (Exhibit F) under the racist username "Azria The Amazon DRAINTHESENIIGAS," Defendant wrote: "*END MAXWELL'S VEXATIOUS AND FRIVOLOUS PLIGHT... ALSO GET A PICK FOR HIS BAD AFRO.*"

27. Defendant continued to harass Plaintiff's counsel by publishing posts threatening "counter-suits," labeling counsel a "grifter," and baselessly citing Law Society of Ontario (LSO) regulations to intimidate Plaintiff's legal representation. True and accurate copies of these posts are attached hereto as **Exhibit G**.

28. As a direct and proximate result of Defendant's extreme, outrageous, and defamatory conduct, Plaintiff has suffered quantifiable financial loss, including the loss of paid memberships and streaming revenue.

29. Furthermore, the psychological effects caused by Defendant are profound.

30. Plaintiff suffers from severe anxiety and depression, exacerbated by Defendant's celebration of the swatting incident.

31. Plaintiff is regularly attending therapy sessions to cope with the emotional distress, panic attacks, and fear directly caused by Defendant's actions.

**AS AND FOR A FIRST CAUSE OF ACTION  
FOR DEFAMATION AND DEFAMATION *PER SE***

32. Plaintiff repeats and realleges each and every allegation set forth above and below as if fully set forth herein.

33. Defendant published specific, verifiable false statements of fact concerning Plaintiff to the public at large via commercial internet platforms.

34. As detailed in the Statement of Facts, Defendant published video broadcasts explicitly and falsely labeling Plaintiff a "groomer," a "rapist," a "human trafficker," and falsely accused Plaintiff of drugging individuals (Exhibit A); falsely accused Plaintiff of sex trafficking for financial profit (Exhibit B); and repeatedly published posts asserting Plaintiff is a "scammer" (Exhibit C).

35. These statements constitute defamation *per se* under New York law because they specifically impute to the Plaintiff the commission of serious crimes—namely, sexual assault, human trafficking, and larceny—and they are designed to injure Plaintiff in his trade, business, or profession by triggering platform suspensions.

36. The statements are demonstrably false. Plaintiff is not a sex offender, has never been investigated for human trafficking or rape, and has never drugged individuals.

37. Defendant published these statements with actual malice—knowing they were false or acting with reckless disregard for their truth—as part of a calculated campaign to destroy Plaintiff's livelihood.

38. As a direct and proximate result of Defendant's publication of these falsehoods, Plaintiff has suffered special damages, including the specific loss of paid subscribers and streaming revenue. Additionally, Plaintiff has suffered severe reputational harm, humiliation, and emotional distress.

39. By reason of the foregoing, Plaintiff has sustained actual, general, and special damages, currently estimated in an amount **not less than fifty thousand dollars (\$50,000.00)**, exclusive of punitive damages, costs, and attorneys' fees.

**AS AND FOR A SECOND CAUSE OF ACTION  
FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

40. Plaintiff repeats and realleges each and every allegation set forth above and below as if fully set forth herein.

41. Defendant's conduct was extreme, outrageous, and utterly intolerable in a civilized community. It was not a mere insult or trivial annoyance, but a calculated campaign of terror designed to destroy Plaintiff's peace of mind and exploit his physical endangerment.

42. Defendant's extreme and outrageous conduct is irrefutably evidenced by her weaponization and celebration of "swatting"—a life-threatening event involving the false reporting of a violent emergency to provoke an armed police response, which Plaintiff himself suffered on July 14, 2023 (Exhibit D).

43. Rather than condemning this violence, Defendant publicly mocked it. By broadcasting a written comment laughing at another victim of a police raid ("*LMAOOO CARRIE WHO SWATTED YOU LMAOOOOOOO*") (Exhibit E), Defendant intentionally amplified Plaintiff's trauma, signaling that she finds the physical endangerment of her targets to be a source of amusement.

44. Defendant's intent to cause severe distress is not a matter of inference but of public confession. Defendant created a fundraising vehicle specifically tailored to "*BREAK KENNETH*,"

soliciting funds from the public to finance a campaign of terror designed to psychologically destroy the Plaintiff.

45. Defendant acted with the specific intent to cause severe emotional distress, or with reckless disregard of the substantial probability of causing such distress. Defendant explicitly acknowledged her intent to cause trauma, publicly admitting on her fundraising campaign: *"I'm toxic as fuck... These type of people should be distressed"* (Exhibit F).

46. To facilitate this harassment, Defendant engaged in a campaign to label Plaintiff as a "Sex Trafficker" and "Rapist." This goes beyond defamation; it is conduct calculated to incite public hatred and potential vigilante violence against the Plaintiff, placing him in constant fear for his physical safety.

47. Defendant knew, or should have known, that falsely labeling Plaintiff a "Human Trafficker" and celebrating police raids on his home would cause traumatic psychological injury.

48. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered severe emotional distress that is medically documented and of such a nature that no reasonable person could be expected to endure it, necessitating ongoing medical therapy for anxiety, depression, and panic attacks.

49. Plaintiff's injuries include:

a. Post-Traumatic Stress: Persistent fear for his life and safety, and the inability to feel secure in his home following the police raid and Defendant's subsequent mockery of it;

b. Professional Impairment: The inability to work effectively as an online content creator due to the constant anxiety that any live stream could trigger another attack or false criminal accusation;

c. Medical Necessity: The need for ongoing therapy and medical treatment to cope with anxiety, depression, panic attacks, and nightmares directly resulting from Defendant's campaign.

50. There is a direct causal connection between Defendant's wrongful conduct and the severe emotional distress suffered by Plaintiff. Absent Defendant's unlawful acts, Plaintiff would not have incurred these severe psychological injuries.

51. By reason of the foregoing, Plaintiff has sustained actual, general, and special damages, currently estimated in an amount **not less than fifty thousand dollars (\$50,000.00)**, exclusive of punitive damages, costs, and attorneys' fees.

**AS AND FOR A THIRD CAUSE OF ACTION  
FOR PRIMA FACIE TORT**

52. Plaintiff repeats and realleges each and every allegation set forth above and below as if fully set forth herein.

53. The Defendant's conduct was motivated solely by "disinterested malevolence"—a malicious intent to injure the Plaintiff without any valid social, economic, or legal justification.

54. Defendant's malevolence is explicit and documented. She launched a commercial fundraising campaign titled "*HELP AZRIA BREAK KENNETH*" (Exhibit F), wherein she solicited funds to purchase illegal narcotics ("*NEED MORE BLOW*") to fuel her ongoing harassment of Plaintiff.

55. In furtherance of this malicious scheme, Defendant engaged in a coordinated effort to obstruct justice by harassing Plaintiff's New York legal counsel, employing racial slurs ("*DRAIN THE SENIGGAS*"), racially offensive comments regarding counsel's appearance ("*BAD AFRO*"), baseless legal threats, and publishing defamatory statements to intimidate Plaintiff into abandoning his legal rights (Exhibits F and G).

56. Defendant's actions were designed to trigger algorithmic "de-platforming" and sever Plaintiff's income streams.

57. Furthermore, Defendant engaged in the malicious distortion of neutral, lawful acts to fabricate a criminal profile.

58. In her broadcast, Defendant obsessed over minute details—such as Plaintiff "wearing sunglasses" or "scanning the room"—and twisted these mundane actions into "proof" of predatory "grooming" tactics, stating: "*He's calculative... I can list multiple ways he's a predator.*" This demonstrates a conscious effort to manufacture criminality where none exists.

59. These statements contained no news value and were not matters of legitimate public concern; their sole purpose was to ridicule Plaintiff, destroy his professional credibility, and deprive him of legal representation by labeling his counsel a "grifter."

60. Defendant's sole motivation was to inflict harm upon Plaintiff without any excuse or justification.

61. Defendant engaged in a series of acts which, even if arguably lawful in isolation, were done as part of a coordinated scheme to destroy Plaintiff's livelihood.

62. The fact that Defendant continued this campaign even knowing of the police raids, and publicly mocked victims of swatting (*see* Exhibit E), demonstrates a relentless desire to harm that transcends mere negligence or rivalry.

63. As a direct result of this malicious scheme, Plaintiff has suffered specific, quantifiable financial loss, including the loss of paid memberships and streaming revenue.

64. By reason of the foregoing, Plaintiff has sustained actual, general, and special damages, currently estimated in an amount **not less than fifty thousand dollars (\$50,000.00)**, exclusive of punitive damages, costs, and attorneys' fees.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff demands judgment against Defendant as follows:

1. **Compensatory Damages** in an amount to be determined at trial, but not less than **\$50,000.00**;
2. **Punitive Damages** in an amount to be determined at trial to punish Defendant's willful and malicious conduct;
3. **Issuing a Preliminary and Permanent Injunction**, compelling the Defendant, her agents, and all persons acting in concert with her, to:
  - a. Immediately cease and desist all further harassing and threatening communications directed at the Plaintiff and his legal counsel, specifically any conduct that falsely accuses Plaintiff of criminal acts such as "Human Trafficking," "Rape," or "Grooming";
  - b. Immediately remove and permanently delete all video broadcasts and posts containing false allegations of human trafficking, rape, drugging, and financial fraud;
  - c. Immediately terminate and permanently remove the fundraising campaign hosted on "GoFundMe" titled "*Help Azria Break Kenneth*," which solicits funds for illegal narcotics and promotes hate speech against Plaintiff and his counsel;
  - d. Permanently cease and desist from publicly disclosing, publishing, or distributing any private information concerning the Plaintiff, including his residence address, phone number, or personal health details ("doxxing").
4. **Attorneys' Fees and Costs** associated with this action;
5. Such other and further relief as this Court deems just and proper.

Dated: April 7, 2026

Respectfully Submitted,

MAXWELL & VIVIANI, PLLC

By: *Robert Maxwell*

Robert Maxwell, Esq.

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*Counsel for Plaintiff Kenneth Chookhachian*

**VERIFICATION**

I, Kenneth Chookhachian, am the Plaintiff in the within action. I have read the foregoing Verified Complaint and know the contents thereof.

I affirm this 7<sup>th</sup> day of April, 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, except as to matters alleged on information and belief and as to those matters I believe it to be true, and I understand that this document may be filed in an action or proceeding in a court of law.



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Kenneth Chookhachian

## eSignature Details

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<b>Signer ID:</b>	<b>1DWEXT4aq55S5BWgrPNDcxzi</b>
Signed by:	Ken Chookhachian
Sent to email:	arten777@aol.com
IP Address:	74.65.215.107
Signed at:	Apr 7 2026, 4:24 pm EDT