

<input checked="" type="checkbox"/> County Court <input type="checkbox"/> District Court _____ County, Colorado Court Address: <u>100 JEFFERSON COUNTY PARKWAY</u> <u>GOLDEN, COLORADO 80401</u>		▲ COURT USE ONLY ▲
Plaintiff(s)/Petitioner(s): <u>STEVE QUEST</u> v. Defendant(s)/Respondent(s): <u>JAKE MORPHONIOS</u>		
Attorney or Party Without Attorney (Name and Address): <u>STEVE QUEST 98 WADSWORTH BLVD</u> <u>#127-245 LAKEWOOD CO 80226</u> Phone Number: <u>720</u> E-mail: <u>STEVE@STEVEQUEST.COM</u> FAX Number: <u>[REDACTED]</u> Atty. Reg. #: _____		Case Number: <u>19C670</u> Division: <u>H</u> Courtroom: <u>2G</u>
REPLY TO _____		

I am the Plaintiff/Petitioner Defendant/Respondent in this action. I hereby reply to DEFENDANT (title of pleading) as follows:

THE DEFENDANT, IN FACT, FALSELY ACCUSED THE PLAINTIFF OF PEDOPHILIA, A NUMBER OF TIMES, DURING THE DEFENDANT'S LIVE BROADCAST ON APRIL 6 2019 AS PROVEN IN EXHIBIT #1 DD

I am requesting:

THAT THE DEFENDANT ISSUE A FULL ON CAMERA VIDEO ON HIS BLACKSTONE INTELLIGENCE NETWORK YOUTUBE PAGE, A FULL RETRACTION FOR DEAMING AND FALSELY ACCUSING THE PLAINTIFF OF PEDOPHILIA AND A MONETARY JUDGEMENT.

Date: May 30 2019

[Signature]
 Plaintiff/Petitioner or Defendant/Respondent

CERTIFICATE OF SERVICE

I certify that on May 31st 2019 (date) a true and accurate copy of this Reply was served on the other party by:

Hand Delivery, E-Filed, or Faxed to this number _____ or by placing it in the United States mail, postage pre-paid, and addressed to the following:

To: JAKE MORPHONIOS
325 MOUNTAIN ST #1333
KERNERSVILLE, N.C. 27289

[Signature]
 (Your Signature)

IV. PLAINTIFF FAILS TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED

Steve Quest alleges in his Complaint that “Jake Rondle Morphonios accused me of vile and disgusting acts during a live broadcast on his Blackstone Intelligence channel, defaming my character in which thousands of people heard it publicly”.

This assertion is vague, nonspecific and untrue. When alleging defamation, a Plaintiff's failure to identify specific false statements reasonably implied from the Defendant's speech indicates that speech is a protected expression of opinion.

(Plaintiff's Answer)

In EXHIBIT #1 – (DVD), the Defendant, with his face and his voice, accuses the Plaintiff of being a pedophile. That livestream broadcast occurred on April 6, 2019, from the Defendant's Blackstone Intelligence Network Youtube channel. The Defendant, falsely accused the Plaintiff, of pedophilia a number of times during that livestream. Over four thousand five hundred people heard and saw the video, which triggered this very lawsuit.

III. INVALID SERVICE OF PROCESS

Colorado Rules of Civil Procedure, Rule 4(e) (1), states that the personal service must be made: “Upon a natural person whose age is eighteen years or older by delivering a copy thereof to the person, or by leaving a copy thereof at the person's usual place of abode, with any person whose age is eighteen years or older and who is a member of the person's family”.

(Plaintiff's Answer)

The Plaintiff paid the Forsyth County North Carolina Sheriff's Office, to provide a professional service. If they failed to properly serve the Defendant, the Plaintiff has no culpability in their action.

V. DISMISSAL WITH PREJUDICE BASED ON FRIVOLOUS & VEXATIOUS COMPLAINT

Plaintiff's Complaint is both frivolous and vexatious. It attempts, in bad faith, to manipulate the Court and use it as a weapon of harassment in an ongoing cruel and concerted attempt to intimidate, bully and torment the defendant as well as to provide self-promotion and internet fame for the Plaintiff.

(Plaintiff's Answer)

The Defendant, and the Defendant's Blackstone Intelligence Network's Youtube channel has over two hundred thousand subscribers and on April 6, 2019, the Defendant conducted a livestream and accused the Plaintiff of pedophilia numerous times while over six hundred people were watching live. Over four thousand, five hundred people saw the video before the Defendant removed it. **SEE EXHIBIT #2**

The Defendant was making money, via Adsense, Donations via Paypal, and Superchats for the Defendant's defamation against the Plaintiff.

The Defendant's introduction to this very lawsuit explicitly points out what a professional independent journalist the Defendant (Jake Morphonios) is coupled with the Defendant's investigational skills yet, the Defendant failed to investigate the validity of the false accusations "of pedophilia" launched against the Plaintiff (Montagraph, OctoberReignz aka (Steve Quest)).

Lastly, if the Defendant is promoting Blackstone Intelligence Network as a viable, reliable, trustworthy organization, as journalists, they are held to a higher public standard. In business, perception is everything. When journalists get it wrong and deliver erroneous information, it is their duty to issue an immediate retraction, to maintain journalistic integrity.

C. Specific Jurisdiction Inapplicable to Defendant

However, even if the Defendant had been aware of the true identity behind the anonymous profiles, the act of stating a personal opinion or referencing to publicly available information about the Plaintiff from across the country cannot give rise by itself to specific personal jurisdiction. No act is alleged against Defendant that he purposefully availed himself of the privilege of conducting activities in the state of Colorado, thus invoking the benefits and protections of its laws.

(Plaintiff's Answer)

The Defendant, and his Blackstone Intelligence Network services a world wide stage. Whereas the Defendant has stated numerous times to travel around the United States for speaking engagements, in which on April 14, 2019, the Defendant published a video, "What's Ahead This Week on Blackstone Intelligence". Where the Defendant tells his listeners that the Defendant will be traveling to Colorado, Mexico, and Hawaii and is planning on future speaking engagements around the United States. **SEE EXHIBIT #3**

Lastly, addressing whether the Defendant knew the identity behind the anonymous profiles, there are a plethora of videos available on Youtube that have stated that Montagraph is in fact Steve Quest. In which those videos were published as far back as 2010 and 2011. **SEE EXHIBIT #4**

The Defendant published a video on the Defendant's Blackstone Intelligence Network Youtube channel May 29, 2019, acknowledging personal details of the Plaintiff acquired by third parties on the internet as shown in Exhibit #5. **SEE EXHIBIT #5**

(Plaintiff's Answer)

In Summation, the Plaintiff requested numerous times on the Plaintiff's own social media channel (Montagraph) that the Defendant issue an apology/retraction for the erroneous accusations of pedophilia published by the Defendant on April 6, 2019 from the Defendant's Blackstone Intelligence Network's Youtube channel. The Defendant has spoken in the past of journalistic integrity, and it is the Defendant's responsibility representing not only the Defendant's network, but all journalists that may make the same error.

The Plaintiff requests that the Defendant issue a stand alone on camera public retraction of the erroneous statements made against the Plaintiff during the Defendant's video published on April 6, 2019, titled (LIVE – Lessons Learned from the PizzaGate Conspiracy Theory).

This case may set a precedent for future litigants who may have their reputations besmirched by any network, big or small. Social media has become a staple of the world wide community's daily interactions. It is imperative that we the people, while enjoying the fruits of the First Amendment (freedom of speech), that we act responsibly, unequivocally, as to preserve journalistic integrity while at the same time, protecting individual's reputations and the fundamental right of the pursuit of happiness.

Steve Quest

EXHIBIT #2



EXHIBIT #3



What's Ahead This Week on Blackstone Intelligence

6,173 views

314 175 SHARE SAVE ...



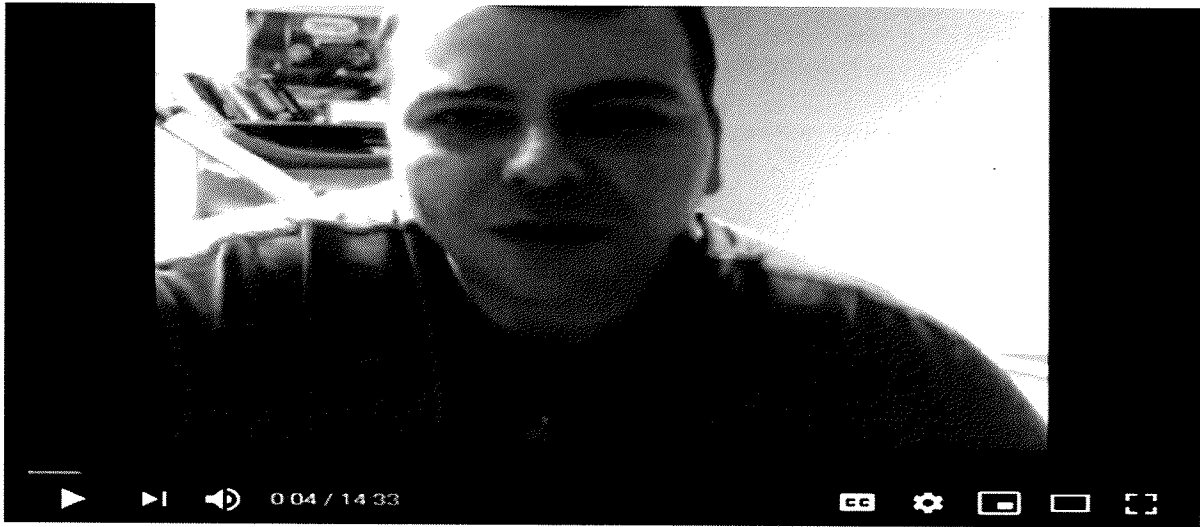
Blackstone Intelligence Network
Published on Apr 14, 2019

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I'll be on the road for meetings and private speaking events for the next 10 days. If you are interested in hosting or helping to set up a Blackstone speaking event in your area over the summer, email me at jake@blackstoneintel.com

EXHIBIT #4



Montagraph aka Steve Quest rebuttle.

1,327 views

16

13

SHARE

SAVE

...

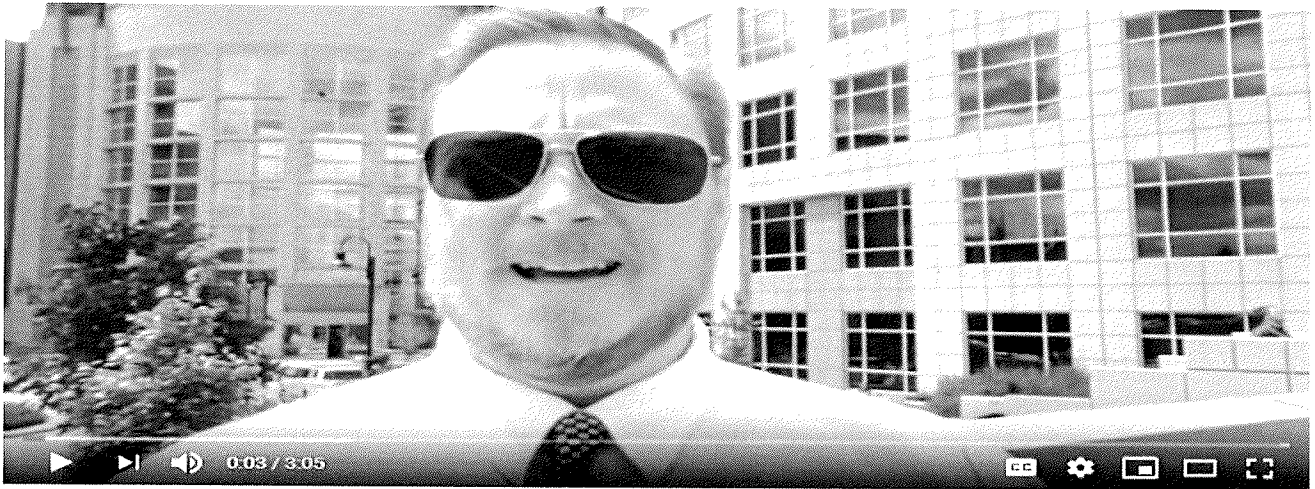


AnnieBlight

Published on Dec 28, 2010

SUBSCRIBE 74

EXHIBIT #5



JEFFERSON COUNTY COURTHOUSE

Jake Wins 1st Round In Court vs Troll Steve Quest Montagraph

9,559 views

1.2K 162 SHARE SAVE ...



Blackstone Intelligence Network
Streamed live on May 29, 2019

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Blackstone Intelligence Network ✓ 8 minutes ago

Steve Quest has already changed his name in court once already. Back in 1996 for some reason he decided to change his name from Roy Warren Marshall to Steve Quest. I wonder what reason a young man would change his name like that to something totally different?

1 REPLY

EXHIBIT #6



EXHIBIT #6 -DICTATION OF VIDEO (LIVE – Lessons Learned from the PizzaGate Conspiracy Theory) published April 6, 2019

*Note at the time you see the Defendant's face and hear the Defendant's voice, the Defendant states:

“Yeah, here. That's where it is. Uhm Montagraph and his pedophilia (laughs). If anyone wants to find out about Montagraph, just uh, bad stuff. Good thing I got screen shots and also downloaded the videos of Montagraph, Monty, doing your, talking about your pedophilia stuff. Oh, that's not true, I'm going to sue you. Yeah? Good, do it. I would love to take that information into court and present it, because it's your face, it's your voice and man are you a disgusting human being. If you want to find out good stuff about Montagraph, find the channel TDOR 53, (spells out) TDOR 53. Do you want to learn about Montagraph? Well you probably don't want to, but maybe Google “Montagraph Sex with a Melon” (laughs) if you are willing to find that stuff out.