

STATE OF NORTH CAROLINA
COUNTY OF DUPLIN

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
26-CVS-
26CV001105-300

BRITTANY ALONDRA
BOLTINHOUSE,

Plaintiff,

v.

THOM BRODEUR; JKN UNIVERSE,
LLC d/b/a THE MISS USA ORG./MISS
UNIVERSE;
A BLAIZE PRODUCTIONS LLC;
ARIANA BLAIZE & NIC BLAIZE,

Defendants.

COMPLAINT
(Jury Trial Demanded)

BRITTANY ALONDRA BOLTINHOUSE (“Brittany” or “Plaintiff”), by and through undersigned counsel, complaining of Defendants JKN UNIVERSE, LLC d/b/a Miss USA/MISS UNIVERSE ORG. (“Miss USA”), THOM BRODEUR (“Brodeur”) (together with Miss USA, the “Miss USA Defendants”), A BLAIZE PRODUCTIONS, LLC (“ABP”), ARIANA BLAIZE (“Ariana Blaize”), and NIC BLAIZE (“Nic Blaize”) (collectively, the “ABP Defendants”), alleges as follows:

INTRODUCTION

*Whole lotta, yeah, money, not a lot of patience
Whole lotta niggas been waiting
They want some time on it, now I wanna flaunt it
Panty and a bra, we can get involved, boy...*

“Heated” by Beyoncé (2022)¹

¹ As set forth in further detail below, the ABP Defendants were solely responsible for selecting and playing this song during Brittany Boltinhouse’s “Fitness category” walk across the stage at the same pageant where she was crowned 2026 Miss North Carolina USA. Weeks later, Defendants attempted to justify publicly branding Brittany a racist and bigot because six resurfaced posts from 2017 and 2019—back when Britany was still a teenager—revealed she used the same popular slang term “nigga” as in the Beyoncé lyric.

Available at <https://www.youtube.com/watch?v=o3WqRPM6M0A> (last accessed August 21, 2026).

This case is about two powerful institutions weaponizing their social media platforms to deploy a catastrophic, global campaign to injure a bright, inspiring beauty pageant winner of mixed race and proud daughter of immigrant parents, embodying the ideal work ethic and American dream.

This case is not about whether Defendants—who operate a privately owned beauty pageant organization—had legal authority to remove Brittany’s 2026 Miss North Carolina USA crown, which they did immediately after she won it and mere weeks before she was to advance to the national Miss USA competition. Rather, this case is about what Defendants did next: maliciously coordinating to publish a false public narrative portraying Brittany Boltinhouse as a racist, homophobe, transphobe, and intolerable bigot to be shunned from public life—then lied to the world that Brittany had confessed to being such an intolerant monster.

When these Defendants sicced an online mob on a young woman, they knowingly ensured her excruciating reputational destruction. Conspiring and understanding fully what they were unleashing, Defendants pretextually deployed Brittany’s nearly decade old social media posts as a teenager to remove her duly earned crown as Miss North Carolina USA. As the Defendants’ own audio recorded statements confirm, their true motivation was because Brittany’s political posts revealed she was a staunch supporter of President Trump, the assassinated conservative activist Charlie Kirk, and an open skeptic of President Biden’s “Transgender Day of Visibility.” Defendants’ coordinated publications generated devastating media coverage and instantly transformed Brittany’s public identity from the newly crowned Miss North Carolina USA into the target of widespread accusations of racism, homophobia, transphobia, and bigotry. Those accusations remain associated with Brittany’s name across the world.

Because Defendants understood the power and foreseeable consequences of their acts, because they understood publishing through influential institutional and executive channels—knowing that the media and public would treat their statements as authoritative, repeat them, and amplify them to audiences far beyond Defendants’ own social-media followers—Brittany Boltinhouse shall hold them to account.

PARTIES

1. Plaintiff Brittany Alondra Boltinhouse (“Brittany”), née Brittany Alondra Espino—who at 27 years old was crowned the 2026 Miss North Carolina USA and qualified to compete in the Miss USA pageant to be hosted August 24-27, 2026 in Miami, Florida—was born in the United States on March 17, 1999 to a Hispanic father from Honduras and a Hispanic mother from Mexico.
2. Brittany’s paternal great-grandfather, Antonio Sosa Figueroa, deceased, ethnically self-identified all his life as a black, Afro Latino Honduran.
3. Sosa Figueroa’s Honduran government issued identification is here:



4. Brittany is a natural person, a citizen and resident of Duplin County, North Carolina, and was the duly crowned Miss North Carolina USA 2026 before

Defendants maliciously and wantonly conspired to remove her crown and defame her as set forth in this Complaint.

5. Defendant JKN Universe, LLC d/b/a the Miss USA Org./Miss Universe Org. (“Miss USA”) is upon information and belief, a Delaware limited liability company that conducts business under the name “Miss USA,” operates the Miss USA pageant system, and purposefully conducts activities in North Carolina through its licensing, administration, selection, promotion, and oversight of the Miss North Carolina USA title and titleholder.

6. Defendant A Blaize Productions, LLC (“ABP”) is a Georgia limited liability company that controls, conducts, organizes and operates the Miss North Carolina USA pageant and served as the state-level operator in 2026 when Brittany won the title and crown.

7. Defendant Thom Brodeur is a natural person who, upon information and belief, resides in Florida and at all relevant times served as Chairman, President and Chief Executive Officer of Miss USA.

8. Defendant Ariana Blaize is a natural person who, upon information and belief, resides in Georgia and at all relevant times served as ABP’s Executive Director.

9. Defendant Nic Blaize is a natural person who, upon information and belief, resides in Georgia and at all relevant times served as ABP’s Co-Director.

JURISDICTION AND VENUE

10. This action arises from conduct expressly directed toward North Carolina and a North Carolina resident. Defendants’ publications concerned the reigning Miss

North Carolina USA, a North Carolina title administered through Defendants' North Carolina pageant activities, and the effect of those publications was intentionally and foreseeably centered in North Carolina.

11. A substantial part of the events giving rise to these claims occurred in, or was purposefully directed toward, North Carolina. Plaintiff suffered injury to her reputation, livelihood, professional relationships, and community standing in Duplin County.

12. This Court has jurisdiction over the subject matter of Brittany's claims pursuant to N.C. Gen. Stat. §§ 7A-3, 7A-240 and 7A-243.

13. Venue is proper in Duplin County, North Carolina pursuant to N.C. Gen. Stat. §§ 1-79 and 1-82.

FACTUAL ALLEGATIONS

"[H]aughty as her demeanor was, she perchance underwent an agony from every footstep of those that thronged to see her, as if her heart had been flung in the street for them all to spurn and trample upon."

Nathaniel Hawthorne, *The Scarlet Letter* (1850)²

Brittany Boltinhouse of Beulaville

14. Reared in the rural backyards of Beulaville, Duplin County, North Carolina, Brittany attended and graduated from the local public high school.

15. In school and growing up, Brittany was friends with classmates of all colors and ethnicities.

² Available at <https://www.gutenberg.org/files/25344/25344-h/25344-h.htm> (last accessed August 21, 2026).

16. Brittany's parents reared Brittany and her sister to be proud American citizens, prioritizing her duties to her Christian faith, her country, her family, and her duties to labor in pursuit of liberty, prosperity and happiness.

17. From a young age, Brittany's immigrant parents instilled in her the profound privileges Americans are afforded.

18. Brittany's immigrant parents taught her that hard work, discipline and commitment to her faith and duties were expected of her as an American citizen.

19. Above all else, Brittany's parents taught her that the opportunity afforded to her as an American citizen was: with hard work and discipline, in America, anyone can rise up in society.

20. Brittany was the first Miss North Carolina USA to be crowned while married.

21. Separate and apart from her role and duties as a beauty pageant, Brittany and her husband founded, own and operate two businesses in North Carolina: a residential floor installation business and an outdoor turf installation business.

Nearly a Decade Ago, Brittany Posted “Nigga” Six Times



22. In 2017—when she was still a teenager— and as set forth in the image above,³ Brittany posted the popular slang term “nigga” on a social media account five times.

23. One time later in 2019, as forth in the image above, Brittany posted the popular slang term “nigga” on a social media account.

³ This image from Brittany’s social media represents a culled collection of posts published by a third party and which were originally posted over several months in 2017 and 2019 when Brittany was a teenager and operating the handle “Sosa the Stallion.”

24. At the time—and for nearly a decade—the posts generated no comments, objections or outcry.

25. Indeed, until online sleuths unearthed the posts in 2026 after Brittany won Miss North Carolina USA and was on her way to compete for Miss USA scheduled for the last week of August 2026 did anyone ever purport to take offense to Brittany’s self-evident, colloquial use of the popular slang term “nigga” that is ubiquitous in American society and culture.⁴

26. The reason is simple: no one took offense because it was evident in 2017 and 2019 when Brittany wrote those posts as a teenager no offense was intended.

27. Indeed, no offense was caused.

⁴ For example, in the year 2017 when Brittany posted the popular slang term “nigga” five times across a period of months, the song “Bad and Boujee” by Migos feature Lil Uzi Vert hit No. 1 on the “US Billboard Hot 100” songs. After the intro begins with “You know, young rich niggas you know somethin’, we ain’t never had no old money...” *the lyrics include the word “nigga” another eighteen times in a song less than six minutes long.* See <https://www.billboard.com/pro/hot-100-migos-bad-and-boujee-lil-uzi-vert-number-one/> (last accessed August 21, 2026). The year before, in 2016, “Broccoli” by D.R.A.M. featuring Lil Yachty hit No. 1 on the Billboard R&B / HipHopSongs, *used the word “nigga” nine times.* See <https://www.billboard.com/pro/dram-broccoli-tops-hot-rb-hip-hop-songs-chart/> (last accessed August 21, 2026). For further cultural critique on the unique yet ubiquitous existence of the slang term “nigga” in contemporary American society and vernacular, *compare and contrast* “Black People v. Niggaz.” Chris Rock, *Bring the Pain* (1996)(available at <https://www.youtube.com/watch?v=f3PJF0YE-x4>) *with The Office*, “Diversity Day,” Season 1, Episode 2 (2005) (available at <https://www.youtube.com/watch?v=kzeYdHC2fs0>)(last accessed August 21, 2026).

28. It is still self-evident in 2026 that no offense was intended by Brittany's 2017 and 2019 posts.

29. In 2026, any offense alleged about Brittany's 2017 and 2019 posts is performative, disingenuous and—as set forth below as to the Defendants misconduct—entirely pretextual.

30. Even if Brittany were to concede offense was intended to a certain audience with her 2017 and 2019 posts, Brittany's use of the popular slang term “nigga” is in no way evidence she is a racist, homophobe, transphobe or a bigot who should be shunned from public life as Defendants set about and conspired to cause with their defamatory social media posts.

31. Indeed, as set forth in the above-image, these 2017 and 2019 posts were both “hearted” (or “liked”) and reposted dozens of times publicly without any objection by anyone until seven years later when Brittany won the crown.

32. Nearly a decade later, as set forth below and when Brittany's immigrant inspired work ethic was propelling her to the American dream, Defendants would conspire to use these innocuous posts and their self-evident ubiquitous use of the popular slang term “nigga” to falsely smear Brittany as a racist, homophobe, transphobe, and bigot.

33. In doing so, Defendants maliciously and wantonly set about to destroy Brittany's reputation, her professional career, harm her businesses, and cause her calculable damages.

34. Defendants hid from the public the real reason they dethroned Brittany: she is a conservative Christian.

Brittany the College Campus Conservative

35. In the early 2020s after high school, Brittany attended East Carolina University (“ECU”) in Greenville, North Carolina.

36. On campus, Brittany sought to challenge her belief systems and actively sought out to engage in the open debate of ideas.

37. As a college student, Brittany began to attend conservative group meetings to discuss and debate politics.

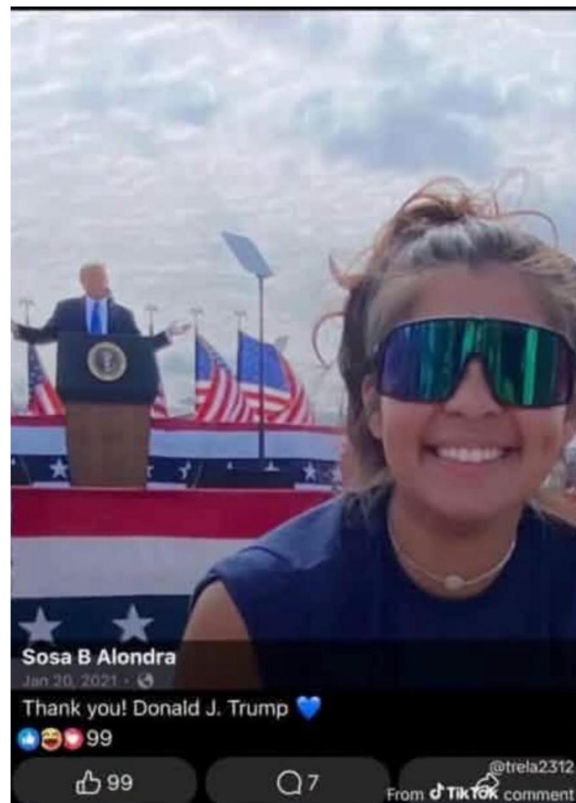
38. One campus group Brittany became interested in was Turning Point USA (“TPUSA”), a nonprofit organization that advocates for conservative politics on high school, college and university campuses like ECU.

39. TPUSA was founded by conservative advocate Charlie Kirk, who was later politically assassinated in 2025.

40. On January 6, 2021, Brittany joined other ECU students on a bus tour organized by TPUSA to travel to Washington, D.C. for a speech by President Donald J. Trump on the National Mall.⁵

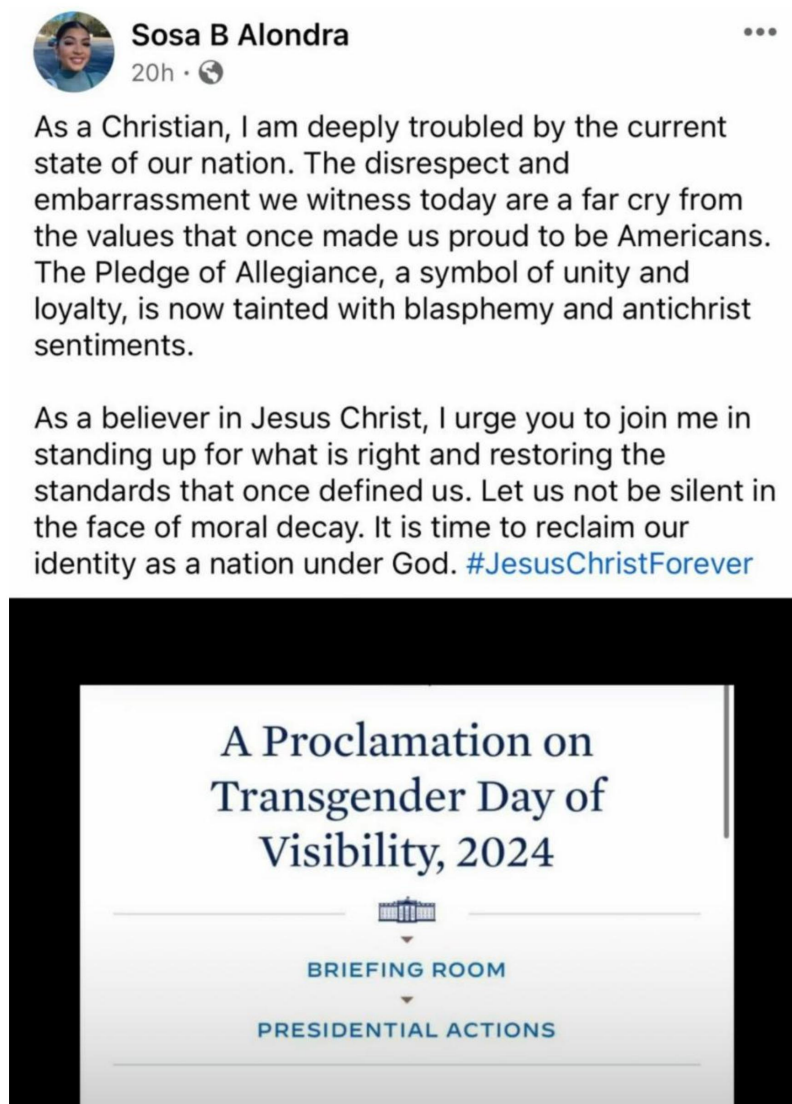
⁵ Before he was elected President of the United States, Donald J. Trump owned Miss USA from 1996 to 2015, serving in the same position Defendant Brodeur now does. When Trump announced his candidacy for President in 2015, Univision refused to broadcast the Miss USA pageant and, days later, NBCUniversal announced it would refuse to air Miss USA over Trump’s political statements. Despite these networks’ attempt to cancel him, Trump was elected President in 2016 and—despite the events of January 6, 2021—reelected in 2024. See “Donald Trump dropped by NBC over candidate’s comments about Mexico.”

41. That day, Brittany attended President Trump's speech on the National Mall.
42. In the events that followed President Trump's speech, Brittany returned home.
43. Brittany neither approached nor entered the Capitol Building.
44. Brittany never encountered law enforcement.
45. Brittany attended the speech and departed Washington, D.C..
46. On January 20, 2021, Brittany posted on a social media account an image of herself at a speech by then former President Trump:



(available at <https://www.theguardian.com/us-news/2015/jun/29/donald-trump-dropped-nbc-mexico>) (last visited August 21, 2026).

47. In March 2024, Brittany posted on social media her political objection to President Biden’s “Transgender Day of Visibility:”



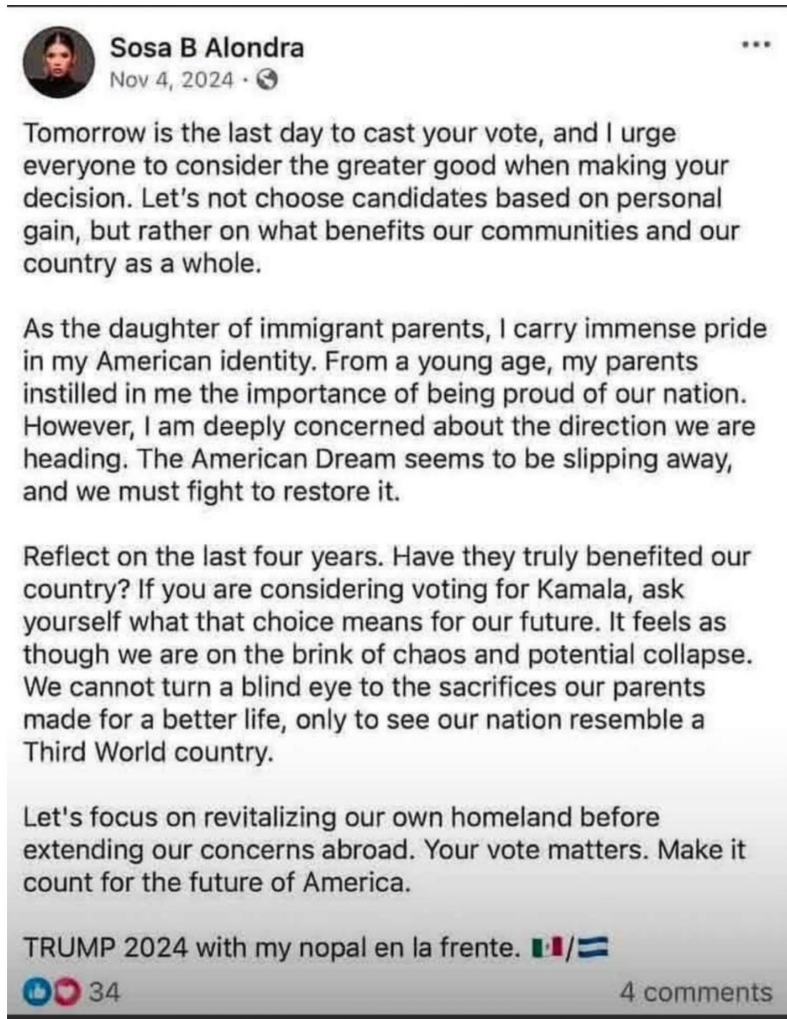
48. On August 12, 2024, Brittany posted on social media concerning Andrew Tate and Tristan Tate—prominent conservative social media “influencers” and supporters of President Trump and the Trump family:⁶

⁶ Brittany’s post concerning Andrew Tate was entirely consistent with Trump family members and other prominent conservative figures. *See, e.g.,* Donald Trump, Jr.’s



49. On the eve of the November 2024 Presidential election, Brittany posted on social media her support for Trump and urging fellow American citizens to exercise their right to vote:

May 31, 2023 post comment on Andrew Tate's X account, characterizing Tate's treatment and experience as "Absolute insanity." (*available at* <https://x.com/DonaldJTrumpJr/status/1663794412428619778?s=20> (last accessed August 21, 2026); later in 2024 Trump, Jr. appeared on a livestream with Andrew Tate stating "you've got people attacking you as far as I'm concerned," <https://www.forbes.com/sites/saradorn/2026/07/19/tate-brothers-arrested-in-florida-what-we-know-about-their-trump-ties> (last accessed August 21, 2026); *see also* online comment from notorious entrepreneur, online influencer, media mogul, prominent Trump supporter and Trump Administration's Department of Government Efficiency chief Elon Musk on January 7, 2025 saying of Andrew Tate: "He's not wrong." (*available at* <https://x.com/elonmusk/status/1876505478068593121>) (last accessed August 21, 2026).



50. When TPUSA founder and university campus conservative activist Charlie Kirk was killed on live television in 2025, Brittany posted the following on social media:

Sosa B Alondra

Sep 12, 2025 · 🌐

It is heartbreaking and deeply troubling to see so many people comparing the tragic assassination of Charlie Kirk to completely different global challenges, like the ongoing war and humanitarian crisis in Palestine, or the heated debates and struggles surrounding immigration in America. While those issues are real and serious in their own context, they are not the same as a public assassination. To equate them is to diminish the shocking reality of what has happened here at home—especially considering this took place on school property, a place where young adults are supposed to safely pursue their education, not witness violence. For many of us who are children of immigrant parents, this hits even deeper. Our parents left countries filled with violence and instability, believing America was the place where their children could be safe and educated. To now see that same kind of violence taking place here in the United States is both heartbreaking and enraging.

✨ Charlie Kirk has been one of the greatest inspirations in my life. Growing up as a child of immigrant parents, I found opportunity and hope in his example. He showed me what was possible—how someone so young and driven could launch a movement, connect with people, build the tools and knowledge, and engineer real change. Along with other voices like Candace Owens and Ben Shapiro, he opened doors I didn't even know existed. And though he started early, at age 31 he had already laid a foundation that will outlive him, because he built not just a platform but a network—versions of himself everywhere—spreading his ideas and empowering others.

And on a personal note, this tragedy hit closer than I ever expected. A handful of my friends were partially there and had to witness this, as people of faith who also create content online. One of my closest friends was second in line to speak after Charlie Kirk—just seconds away from being on that stage when the shots rang out. That thought alone shakes me to my core. This wasn't just a headline or a distant event. It was real, personal, and it has forever marked the lives of people I know and love.

51. Later in 2026, after Brittany had won the Miss North Carolina USA crown and, as set forth below, Defendants would conspire to use Brittany's above historic posts and support for the debate of ideas, her support of conservative politics and conservative political movements, her participation in TPUSA events as a college student including the college bus tour to attend President Trump's speech on the National Mall, her support for conservative activists Charlie Kirk, her post about the Tate brothers that was no different from what prominent online members of the

Trump family and Elon Musk have said, and her attendance at Trump rallies as a “totality of circumstances” to falsely portray and defame her to a massive online audience as a racist, homophobe, transphobe and bigot who should be shunned from public life.

52. Defendants never expected a first-time pageant contestant to win.

53. When Brittany did just that, Defendants chose to publish a lie about her in order to prevent someone with her political beliefs from remaining in the competition.

54. In doing so, Defendants maliciously and wantonly set about to destroy Brittany’s reputation, her professional career, and cause her calculable damages.

Brittany and the Beauty Pageant

55. In 2026, when she was 27 years old, Brittany entered her first beauty pageant.

56. Brittany’s dream was more than to become Miss USA.

57. Brittany wished to prove that no matter where you come from—even if you’re from a small town—no matter your background, your skin tone, or who you are, you have the right to stand on any stage possible and pursue something bigger than where you started.

58. From there, Brittany’s ambition was to be a national ambassador, representing the U.S. at the global Miss Universe pageant, engage in philanthropy, make public appearances in support of public causes, pursue personal career development including growing her two businesses, while also pursuing higher education, scholarships, travel, and brand opportunities to advance causes important to her and in alignment with her core values.

59. Brittany believed that despite having never competed in a pageant before, her immigrant inspired work ethic instilled by her parents and her commitment to her values would give her a shot at the crown.

60. Miss USA is an annual national beauty pageant founded in 1952 that selects the United States representative for the international Miss Universe competition against pageants from other nations.

61. Miss USA contestants represent all 50 states and the District of Columbia, competing in areas like personal interviews, evening gowns and fitness.

62. Defendant Miss USA is responsible for operating the national-level pageant competition.

63. However, Miss USA does not organize and operate the state-level pageants which are responsible for “crowning” each state winner before they advance to the national level.

64. For North Carolina which selects “Miss North Carolina USA” to compete in the annual Miss USA national level competition, the state-level competition is promoted and operated and organized by Defendant ABP.

65. At the state level competition, contestants gather for a pageant weekend structured identically to the national competition.

66. Specifically, three of five categories to the competition programming are decided by a panel of pageant judges: (Fitness, Interview and Best Gown), while two categories are decided by an online vote or a vote of other contestants (People’s Choice and Congeniality).

67. In late June 2026, Brittany attended the Miss North Carolina USA pageant organized and operated by the ABP Defendants.

68. Despite the fact she was a first-time pageant competitor competing predominately against young women who had many years of pageant experience, Brittany shocked the pageant world, winning four out of five categories: Fitness, Best Gown, People's Choice and Congeniality.

69. Brittany's performance winning four out of five categories of the competition programming meant Brittany was crowned 2026 Miss North Carolina USA.

70. As 2026 Miss North Carolina USA, Brittany was automatically qualified to compete for Miss USA, which is to be hosted August 24-27, 2026 in Miami, Florida by Defendant Miss USA.

71. The only category Brittany did not win in the Miss North Carolina USA competition was the Interview category.

72. During the Fitness category competition of the state-level and national pageants, contestants walk across a stage individually while an up-tempo musical track plays.

73. The segment is designed to showcase the contestant's confidence, physical fitness, and stage presence which are scored by a panel of judges.

74. In the 2026 Miss North Carolina USA competition, ABP was solely responsible for selecting the up-tempo music to be played during the time contestants walk across the stage; the contestants have no prior knowledge of the songs to be played or any role in selecting the music.

75. During Brittany's walk across the stage during the Fitness competition for Miss North Carolina USA, and unbeknownst to Brittany, the ABP Defendants selected "Heated" released in 2022 by internationally renowned artist and music industry mogul, Beyoncé, which contains the following lyrics:

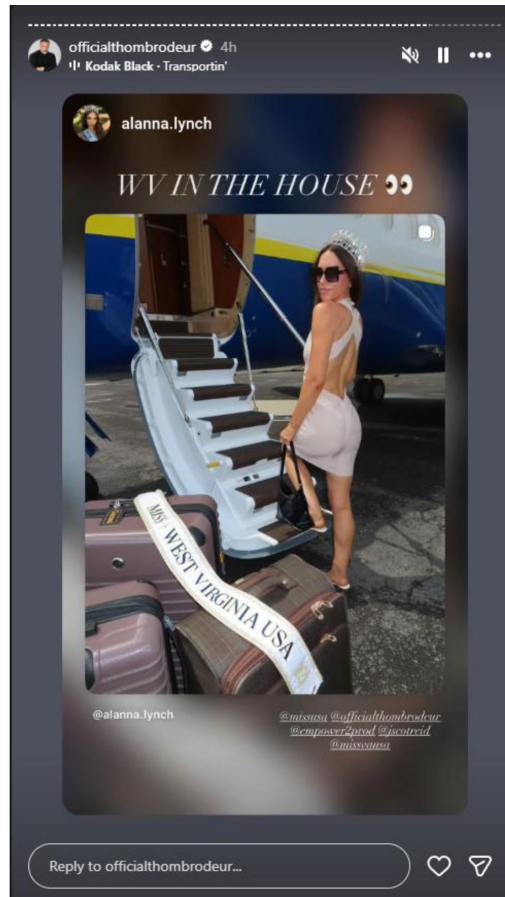
*Whole lotta, yeah, money, not a lot of patience
Whole lotta niggas been waiting
They want some time on it, now I wanna flaunt it
Panty and a bra, we can get involved, boy*

76. Defendant Brodeur himself, as recently as August 19, 2026, posted a photo of another Miss USA contestant on his Instagram page⁷ with a song playing in the background that uses the word "nigga" multiple times.⁸ If this conduct actually warranted removal from the pageant, surely Defendants would have immediately dethroned Miss West Virginia instead of amplifying her messaging.

⁷ Available at

<https://www.instagram.com/stories/officialthombrodeur/3967280089867593561/> (last visited August 19, 2026).

⁸ Specifically, the lyrics to Kodak Black's "Transportin'" which Defendant Brodeur posted *includes the word "nigga" nine times.* Available at <https://www.azlyrics.com/lyrics/kodakblack/transportin.html> (last visited August 21, 2026).



77. After Brittany went on to win the Miss North Carolina USA crown by sweeping nearly every category, including Fitness where ABP selected a song during her stage walk using the slang term “nigga” in its lyrics, Defendants would conspire to use Brittany’s own use of the term “nigga” in posts from when she was a teenager nearly a decade prior to falsely smear Brittany as a racist, homophobe, transphobe, and bigot who should be shunned from public life.

78. In doing so, Defendants maliciously and wantonly set about to destroy Brittany’s reputation, her professional career, her businesses, and cause her calculable damages.

**Defendants Conspired to Defame and Destroy Brittany After the Crown
Because of Her Political Posts**

79. After winning the Miss North Carolina USA crown, Brittany automatically qualified to compete in the Miss USA pageant scheduled for August 24-27, 2026 in Miami, Florida.

80. On August 4, 2026, pursuant to contractual obligations, Brittany self-reported to the ABP Defendants that a video recording had surfaced online purporting to depict Brittany when she was a teenager in an altercation with another teenager as Brittany attempted to defend her sister from an assault.

81. Brittany explained to the ABP Defendants she had acted in lawful defense of a third party (specifically, her sister) and that she had no convictions associated with the incident.

82. The ABP Defendants told Brittany they sympathized with her, with Defendant Nic Blaize stating to Brittany if it had been her (Nic Blaize's) sister, she would have done the same thing under the circumstances.

83. The ABP Defendants specifically informed Brittany that the fight did not warrant revoking her crown.

84. Defendants then quickly set about and conspired to ensure that would never happen by organizing a campaign to defame Brittany and destroy her reputation because of Brittany's past political statements in her above online posts.

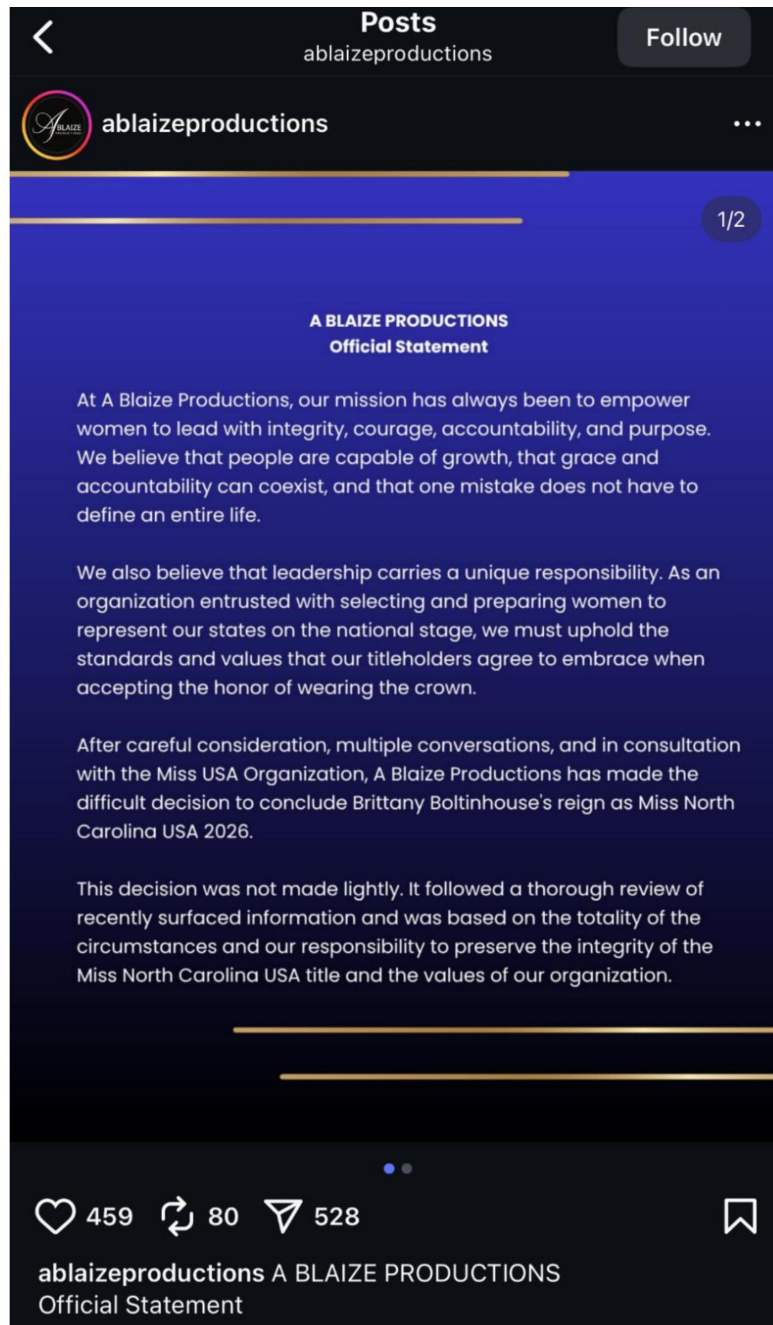
85. The 2017 and 2019 posts detailed above in which Brittany posted the popular slang term "nigga" on six occasions as a teenager had also been brought to the ABP Defendant's attention.

86. The ABP Defendants immediately advised Brittany not to make any new social media posts.

87. As subsequent events would demonstrate, this mandate was an effort by the ABP Defendants to coordinate and strategize with the Miss USA Defendants to create a pretextual basis to falsely and maliciously publish to the online world Brittany was a racist, homophobe, transphobe and bigot who should be shunned from public life.

88. Next, the ABP Defendants proceeded to coordinate with national representatives at Defendant Miss USA.

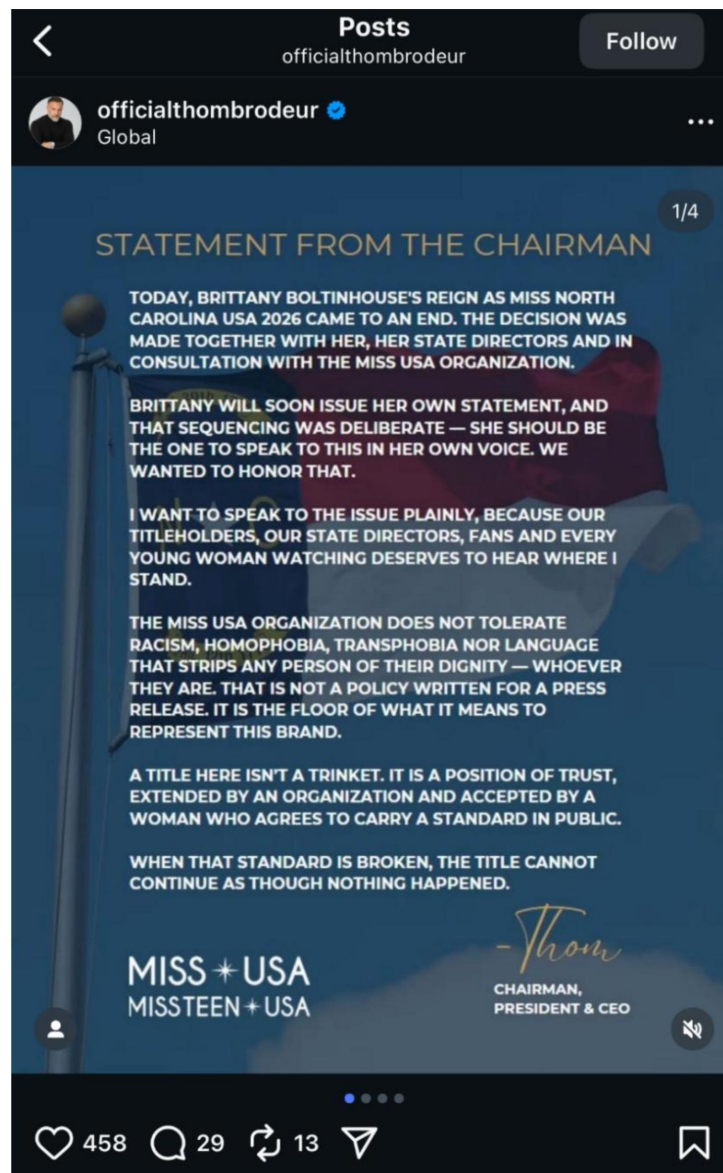
89. On August 5, the ABP Defendants posted the following on its Instagram account:



90. As noted in the statement, Defendant ABP's statement was made following "multiple conversations" and "in consultation with" Defendant Miss USA.

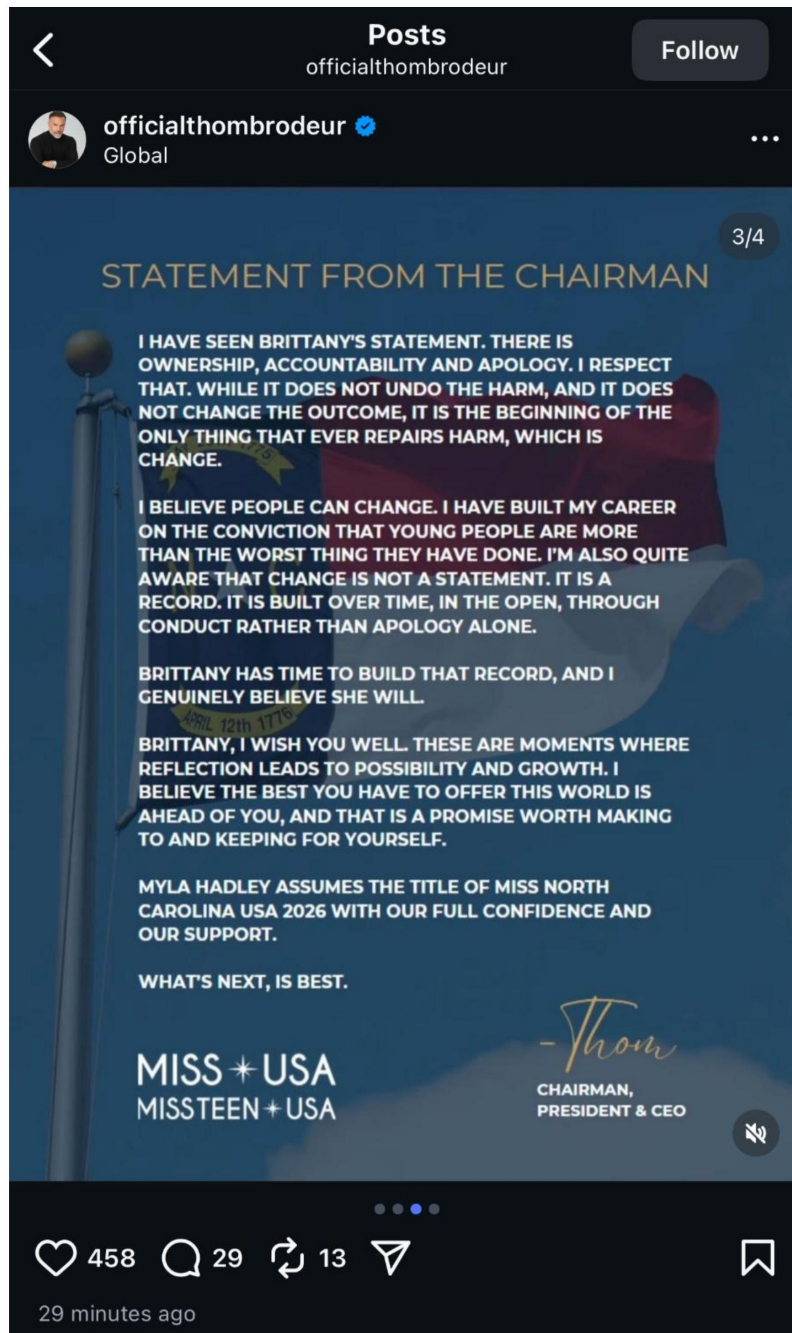
91. It was in these conversations and consultations that Defendants conspired to defame Brittany and destroy her reputation.

92. After Defendant ABP's post, Defendant Thom Brodeur published the following on his Instagram account:⁹



⁹ The images indicate Defendant Brodeur made four parts to his post. The fourth—which included an image of the Miss North Carolina USA runner up who was bestowed the crown and will replace Brittany at the 2026 Miss USA pageant—has been excluded for purposes of concision in this pleading.





93. Defendant Brodeur falsely, maliciously, wantonly and recklessly stated and implied that Brittany was a racist, homophobe, transphobe and bigot who should be shunned from public life, and that those qualities are why she lost her Miss North Carolina title.

94. Defendant Brodeur falsely, maliciously, wantonly and recklessly stated and implied Brittany would issue a statement admitting that she was a racist, homophobe and transphobe.

95. Brittany never agreed to issue a statement acknowledging she was a racist, homophobe or transphobe because Brittany Boltinhouse is none of those things.

96. No evidence exists to demonstrate Brittany Boltinhouse is or ever has been a racist, homophobe or transphobe.

97. No evidence exists to demonstrate Brittany Boltinhouse is or ever has been a bigot who should be shunned from public life.

98. Defendant Brodeur's statement acknowledged and admitted his post was being made together with "state organizers" which were Defendants ABP, Ariana Blaize and Nic Blaize.

99. Defendant Brodeur *knew* the scope and harm to be caused by his falsely stating and implying Brittany was a racist, homophobe and transphobe by stating:

There is a young woman at the center of this. **She has been named, examined, and judged in public in a way that most of us would not survive**, and she is still a human being with a family, a future, and a life ahead of her that is longer than this part of her journey.

Id. (emphasis added).

100. By including this gratuitous statement, Defendant Brodeur demonstrated he understood exactly what he was doing: without citation or reference to **any** facts or evidence, stating and implying to a broad online audience that Brittany was a racist, homophobe, transphobe and bigot to be shunned from public life while recognizing what the fallout and devastating impact would be on Brittany's reputation.

101. By including the false statement that Defendant Brodeur had “seen” Brittany’s statement and “apology,” Brodeur deliberately, falsely and misleadingly gave his and the Miss USA Defendants’ enormous online audience the false impression Brittany had admitted to being a racist, homophobe or transphobe—all of which are categorically denied, false, and untrue.

102. An ordinary reader would understand Brodeur’s assertion that he had “seen” Plaintiff’s “statement and apology” to mean that Plaintiff had authored, approved, adopted, issued, or agreed to issue an apology accepting responsibility for the misconduct being publicly attributed to her.

103. No provision or agreement—general, express or otherwise—between Brittany and Defendants ABP and Miss USA authorized or extended permission to those Defendants to publish false and defamatory statements that Brittany Boltinhouse is racist, homophobe, transphobe or bigot.

104. The Miss USA Defendants’ statements and implications that Brittany was an admitted, apologetic racist, homophobe, transphobe and bigot was not only false and in no way supported by the evidence, those statements were gratuitous and outside any contractual provision or authority Defendants ABP and Miss USA’s may purport to have been acting under when removing Brittany’s crown.

105. When she enrolled as a Miss North Carolina USA and Miss USA contestant, Brittany never authorized, consented to, released, waived or permitted—generally or expressly—the Defendants to make or publish future statements or implications describing Brittany as a racist, homophobe, transphobe or bigot which would defame

her and harm her reputation and her businesses with calculable damages; particularly *after* she was already dethroned and her previously-ongoing relationship with Defendants had concluded.

106. Defendants' coordinated statements evidence a conspiracy to gratuitously, maliciously, wantonly, knowingly and intentionally set about to defame Brittany as a racist, homophobe and transphobe in the absence of any supporting evidence.

107. Defendants social media posts stating and implying Brittany was a racist, homophobe and transphobe are made evident by 1) the written apology ABP attempted to have Brittany consent to and which she refused before Defendant Brodeur publicly lied about it in his post; and 2) audio recordings Brittany made of her conversations with ABP Defendants Ariana and Nic Blaize.

ABP's Attempt to Secure a False Confession from Brittany

*Therefore confess thee freely of thy sin.
For to deny each article with oath
Cannot remove nor choke the strong conception
That I do groan withal. Thou art to die.*

Othello to Desdemona in *Othello*, Act V, Sc. ii, William Shakespeare (1604)¹⁰

108. On August 5, 2026 , Defendant Nic Blaize emailed Brittany advising her 2026 Miss North Carolina USA crown was being taken away.

109. At no time did any Defendants ever provide written notice to Brittany of the evidence or basis or removing her title.

¹⁰ Available at <https://www.folger.edu/explore/shakespeares-works/othello/read/5/2/> (last accessed August 21, 2026).

110. Instead, Defendant Nic Blaize emailed Brittany the following draft statement prepared by Defendant ABP:

Statement from Brittany Boltinhouse

Today, I was informed of A Blaize Productions' decision to conclude my reign as Miss North Carolina USA 2026.

While this is incredibly difficult and heartbreaking, I respect the decision made by A Blaize Productions and the Miss USA Organization. I understand the responsibility that comes with representing an organization, and I recognize that my past actions and public statements have become a distraction from the mission and purpose of this title.

Over the past several days, I have been forced to confront parts of my past that I am not proud of. That has included a fight from my teenage years and social media posts I made as a young adult. Those words and actions were mine, and I take full responsibility for them. I do not seek to minimize them or make excuses for them.

To those who were hurt or disappointed by my past words or actions, I offer my sincere apology.

This experience has been painful, but it has also been humbling. It has reminded me that our words matter, our actions matter, and leadership requires accountability. While I cannot change the past, I can choose how I move forward, and I am committed to continuing to grow, listen, and become a better person.

I want to sincerely thank Ariana Blaize, Nic Blaize, A Blaize Productions, and the Miss USA Organization for the opportunity to serve as Miss North Carolina USA. I know this decision was not made lightly, and I appreciate the professionalism and respect they showed me throughout this process.

I also want to congratulate Myla Hadley on assuming the title of Miss North Carolina USA 2026. I wish her nothing but success as she represents our state at Miss USA, and I know she will make North Carolina proud.

Finally, I want to thank everyone who supported me throughout this journey. Your encouragement has meant more than you know. While this chapter has come to an unexpected end, I believe growth is measured not by whether we make mistakes, but by whether we accept responsibility, learn from them, and continue striving to be better.

I intend to do exactly that.

— **Brittany Boltinhouse**

111. Brittany Boltinhouse played no role whatsoever authoring or contributing to this draft statement.

112. Brittany Boltinhouse never agreed to publish this draft statement.

113. Brittany Boltinhouse never authorized the ABP Defendants to share this draft statement with the Miss USA defendants.

114. Brittany Boltinhouse never authorized the Miss USA defendants to publish, make reference to or acknowledge publicly this draft statement.

115. Brittany Boltinhouse never stated to the ABP Defendants, directly or indirectly, she would be issuing a statement.

116. Critically, the ABP Defendants told Brittany in recorded conversations that the referenced “fight” and “social media posts” were not why she was being stripped of her title.

117. This is the statement and purported apology Defendant Thom Brodeur “had seen” referenced in his above discussed false and defamatory post.

118. Defendant Brodeur lied about Brittany’s statement.

119. Defendant Brodeur lied about Brittany’s intention to issue a statement.

120. Brittany refused to endorse or agree to the statement Defendants repeatedly encouraged her to endorse and publish.

121. Only when Brittany refused on personal moral, religious and political bases did the ABP Defendants relent in their effort to get Brittany to yield.

122. Because Brittany refused to capitulate and confess to being a racist, homophobe or transphobe based on her historic online posts, Defendants conspired and set about to defame Brittany on their social media accounts by stating and implying Brittany was not only a racist, homophobe and transphobe, but that she had admitted to it.

123. All of this was a lie and Defendants knew that.

124. The audio recordings Brittany made during and around this time show how Defendants knew this was a lie.

The Audio Recordings

125. On August 5, 2026, Brittany recorded a telephone conversation with Defendants Nic Blaize, Ariana Blaize as well as Defendant ABP employees Quiana Reed and Randall Smith.

126. The purpose of the call was for the parties to discuss and answer Brittany's questions about the basis for why Defendants ABP and Miss USA concluded to strip Brittany of the 2026 Miss North Carolina USA crown.

127. A true and accurate transcript of the recording includes, in pertinent part, the following exchanges and statements contained in the following paragraphs.

Audio Recording 1: August 5, 2026

128. This exchange between ABP executive Randall Smith and Brittany references ABP's objections Brittany's above historic post about President Biden's "National Transgender Day:"

RANDALL SMITH: Oh, I'm sorry. No, I was just saying, you know, there's just a lot of people that are just offended and hurt. Especially to

see you. A lot of your fan base came from the LGBTQ plus community and they were like fully behind you 100% and then to see like certain comments that you made about them, ***especially when the law, there was the whole incident with the bill that was being passed.*** Like people are just very hurt right now. I understand. I'm one of them and I'm one of them. I mean, I'll speak for myself. I'm one of them. I run a non-profit for trans youth. I run a non-profit for the LGBTQIA community and I'm highly offended and unfortunately I don't think we can return from that. And most of the people internationally as well as nationally, especially a lot of the men, they are a part of the LGBTQIA community whether they identify or not. And I just think we've lost that crowd. We've lost that audience and I don't think it's anything we can turn back from. So I'm sorry, but I'm personally highly offended. And I'm a part of your team. ...And I advocate for the LGBTQIA community every day, all day. Because if you look at my logo right there, that's Renaissance Cares. And I've been doing this for 30 years advocating for a marginalized community. And for anybody to speak up, I don't believe that you're sincere. I don't believe you can apologize. I believe that that's how you felt and that's what's in your heart. And I'm that person. So I feel like you have marginalized me. And unfortunately, I don't see us returning or recovering from this. I just don't. And I'm appalled and I'm offended. Okay. I didn't mean to. I'm emotional about it because this is what I do. And to have someone in my circle, I consider the girls my family. To have someone in my family to have spoken about my community like that because we're not all clumped in one community. All Black people aren't clumped the same. All Hispanic people aren't clumped the same. All Latin people, we're all different. And to clump me in a group and to marginalize me and to go against me, that's going against me personally. You can have your opinions, but let people live and let them be. But this is not a teaching lesson. This is not a teaching moment. It's just something that I personally don't think we can return back from. And I definitely don't believe that from you, for me. This is me talking, not the brand. This is me talking. I don't believe you're sincere. I believe that that's what's in your heart and that's okay. You can do and believe what you want to believe.

But from a Randall standpoint, I'm offended and I don't believe that you are sincere about it. That's what you feel and that's okay. And I stay away from people who don't agree with me as a person, who don't believe that I should walk this world.

BRITTANY: I don't believe that you shouldn't walk this world. I don't believe that. And I never said that ever that you shouldn't exist or anything.

RANDALL SMITH: To go against the LGBTQIA community, that's what you're saying to me.

BRITTANY: *I'm not against the community at all, Mr. Randall. I've never even said that. I said that [President Biden's] Transgender Day, I said that the fact that they switched the day for, that was about that bill. But I never said that you're not allowed to be with the person you want to be or not be non-existent.*

RANDALL SMITH: If you don't even know, I consider myself a trans, if you want to know the truth.

BRITTANY: *Yeah, but I never said that you guys should never exist. That's not what I said.*

RANDALL SMITH: *But to go against the bill, that's the same thing. You're going against my rights.* But that's not open for debate. I'm just telling you how I feel.

129. Defendant ABP's employee in this exchange is stating that a factor in the "totality of circumstances" that justified Brittany's dethroning and the statement concerning her removal was because of her political post objecting to President Bidens' National Transgender Awareness Day in 2024.

130. As Defendant Thom Brodeur alluded and implied in his Instagram post, Brittany's single 2024 post objecting to President Biden's National Transgender Day was evidence of Brittany's homophobia and transphobia which is false, untrue and categorically denied.

131. In this exchange, Defendant Nic Blaize explains to Brittany that the decision to remove her crown would be supported by Miss USA, but if the ABP Defendants did not yield to the desires of the Miss USA Defendants, the national organization would revoke ABP's state-level operation status in 2027:

NIC BLAIZE: I'll be as transparent. *I believe that if we made a different decision, our ability to be directors in 2027, we would probably lose our directorship.: And that's keeping it real. Like, that's just what is at stake here. We just have to, we have to make a tough decision.* And, you know, the national office, you know, gave us their opinion. And they also said, you know, we will stand by the final decision. *But just know that as a brand, if you stand behind your title holder, you are risking this.*

[...]

But it's the branding aspect and whether or not we'll [Defendant ABP] be able to survive. And if something's going to impact our business and *our ability to get a shot next year to be directors again, we have to choose that as a priority.*

132. Defendant Ariana Blaize specifically identified in this exchange that Brittany's objection in her National Transgender Day post was being cited as a basis for her removal:

And the screenshots are, you know, some of them you could tell it's like, you know, you have different accounts. So like, for instance, *the one that talked about, you know, bringing our country, restoring our country back to the standards that it's lost when we are allowing trans people to, that came, that looks like it's Facebook, but it's your picture. And it is Sosa B. Alondra. That's that one.*

133. Defendant Ariana Blaize proceeded to state pressure from Miss USA was a basis for the removal:

ARIANA BLAIZE: What message are we all sending? If the leader of Miss USA is a gay man, the co-director is a black woman, A-Blaize Productions is all minority people, immigrants, LGBTQ plus member. What message are we sending? And they won't stop. This is like, this drives somebody, and they won't, they're not stopping, Brittany. And you know these people firsthand, but they're not stopping. They're not leaving anywhere. I know some, but I don't know all. I will say, they're all people, yeah. Jackson, they're not leaving us alone. Like, hey, this is really crazy. Because they're trying to win. *The message to the national office is that if you decide against everything else, you guys decide to keep your title holder, you have to live and navigate the PR fallout surrounding your decision. That is a quote from what they told us in the email. And I just don't think*

we would be able to survive it. And I think that this decision is going to probably cost us our franchise if we don't make a tough decision. And that's really what led to the decision to remove your title. It's not because, oh my God, we hate Brittney or that. We support you, you know, we get it, we understand. It's, you know, bad decisions, we get it. But from a business, we're not going to be able to survive it, I don't think.

134. Defendant Ariana Blaize then proceeded to characterize why Brittany's political posts were politically offensive, but never cited evidence of Brittany of being a racist, homophobe, transphobe or bigot:

ARIANA BLAIZE: However, in the world of pageantry and this also the corporate world, *when you say certain things, it now offends people. So for example, making a post about the proclamation for Transgender Day.*

We've had a transgender Miss USA contestant. It was Nevada a few years ago. The current owner of Miss USA is a gay man. So when certain things are, most of her fan base are gay men. We have title holders that are going to compete against her that are lesbians. So when they see things like that, people are getting offended. People are offended and that's something that we can't control. Freedom of speech, when you choose to say whatever you want to say, on the contrary, you also have to deal with the backlash of how people would interpret that. So it's all, say what you want to say. But now when you're in a closed circuit where majority of the people, those messages offended them, it makes people uncomfortable. And that's the whole issue that the national office is having and that everyone is having is it's offensive. It's really, oh, I love Trump. Trump is my person. That's not the issue. Because we have a lot of girls that are competing, have voted for Trump or their families have voted for Trump. It's not that. It's the direct messages that are offensive. *So when you say Black lives don't matter, you talk about Black on Black crime. But if we're being clear, there's not just Black on Black crime, there's white on white crime, Hispanic on Hispanic crime, correct on white crime. There's every race and ethnicity has crime against each other. But in a sensitive time like that, saying that is discrediting to what the world also saw, a Black man being killed by a police officer. That is a fact.* That is something that we all thought that man is sitting in jail because of that. So it's not something that is a difference between an opinion and a fact. And these statements are hurting people.

And that's the issue that the national office is having. once again, the fight is the Andrew Tate brothers. Like we're a woman's organization. And saying that no matter what you say about Andrew Tate and Tristan Tate, their mentality is essential to have liberty and freedom. These guys are not good guys to women. They were not good guys to women. And this is Brittany's face, Brittany's name, and Brittany said this.

BRITTANY: So, Andrew Tate were two brothers that stood for helping men to grow their mentality and stuff. Now they did other stuff in their past and degrading women, etc., etc. I didn't know all about that. I just enjoyed their mentality of like getting out of the matrix, having financial freedom. That was the aspect that I liked about them. And I enjoyed their mentality a lot until I saw everything else about the child trafficking because they were accused of that. They were accused of other things. That's whenever I just like, nevermind, this is not, I didn't do my research on it. When I did do my research, it came out about it later and I didn't know. Okay. Did you explain all that to them? No, I haven't. I'm just, I mean, this is the first time me explaining it. I didn't know—That's what I'm saying. There's gotta be an explanation for everything. *That doesn't mean that Brittany is like that or she thinks like that. But she said she agrees with their mentality. And their mentality— I said the mentality of them getting out of the matrix and the aspect of financial freedom. That's exactly what I said.*

ARIANA BLAIZE: *But that's not all that was there. But these men have publicly, publicly called themselves misogynistic. They have publicly said women are the property. And I'm quoting them. I'm quoting them. Women are the property of their husbands and their partners. Women should bear the responsibility—this is the one that really, women should bear the responsibility if they are raped. These are all comments. And this is what I'm saying. It's in totality. The people that you are saying you support, Charlie Kirk, these are videos with him saying these actual things, are saying things like, Michelle Obama is not smart. This woman graduated at the top of her law school. Like it's stuff when you put it all together and Brittany is supporting people that have publicly said these things, it is painting a picture that that is when you post something, you support their mentality. You didn't give a disclaimer about, oh, it's because of, you know—*

BRITTANY: *You're right.*

ARIANA BLAIZE : *It's gonna make us think you support a man who says a woman takes responsibility if she's raped. We can't, like Brittany and I don't mean to be a pile on and I'm not trying to, but it's these comments and these things and supporting these people. When you put it all together, how in the world can we as a business that have women in it survive that? We can't tell women we believe in their empowering and then we are sitting here standing behind someone who supports in their own words, even if that's not how you feel, but that's what your word said. There's nothing that supports a man who says a woman is responsible for being raped or that a woman belongs at home and behind her. And that's what it's about.* Like, it's not, and I hope your dad can understand. So it's not about anything else besides those words.

BRITTANY: I *did not know that, what they were being accused of at the time. I didn't know. And so whenever I was—*

[...]

BRITTANY: *Yeah, I didn't know they [the Tate brothers] were being accused. I didn't know that. I made that post, it was like I enjoyed their mentality, the financial freedom part, because it's true. I just feel like the government tries to keep us at a certain cap of everything. Like, for example, having a nine to five where it doesn't allow us to utilize other skills in our future. I feel like that's how I feel is that they try to put a cap on our mentality in us. And that's the aspect I believed a lot with them. But it wasn't the whole other aspects that I didn't know that they [the Tate Brothers] said.*

[...]

ARIANA BLAIZE: I think what it is, is the post says no matter, it says no matter what you say about Andrew Tate and Tristan Tate, their mentality is essential to have liberty and freedom: So that leaves people to say, think, well, okay, well then she must know. She says no matter what people say about him, they must, she must know what they said.

[...]

And I don't want to keep piling on, but it's a lot that we would have to be responsible. *The national office has already told us in email, we would be responsible for the PR fallout and dealing with the continued PR. It would be now on A Blaize Productions. And we do not have the capacity to fight this. But it's painting a picture of Britney that we have to defend. And I just don't think we have*

the capacity to do that. And that is, so it's not any person that has made this decision. It is the words and looking at it in totality. ***And some of the biggest things is, you know, the Tate brothers, it's so much stuff.***

135. After these exchanges in which the ABP Defendants stated the political bases for objecting to Brittany's post, they never accused Brittany of being a racist, homophobe or transphobe, instead ending the call:

Okay. All right. Thank you guys so much. I really appreciate it. I'm so sorry, Brittany, again, to you.

136. If the ABP Defendants concluded her crown should be removed because Brittany was a racist, transphobe or homophobe, an apology would have been inappropriate to conclude the call.

137. The first audio recording shows the ABP defendants acted under pressure from the national Miss USA Defendants because if they did not, the ABP Defendants would lose state-level credentials and would be unable to withstand public political pressure.

138. In fact, Brittany received a text message from Defendant Nic Blaize discussing the people who complained of Brittany's old social media posts to the Defendants. Nic Blaize made clear that she did not give weight to the complaints, stating about the complainers: "These ppl are a mess and disgusting."

139. Rather, the stated bases concerned Brittany's post objecting to National Transgender Day, a post about social media influencers the Tate brothers, and her support of Charlie Kirk and President Trump.

Audio Recording 2: August 5, 2026

140. The second audio recording between Brittany and the ABP Defendants begins with Brittany objecting to the statement that the ABP Defendants presented to Brittany to endorse, and the ABP Defendants encouraging her to sign it.

NIC BLAIZE: They're just waiting on that from us. So when you get a chance, just send it so I can at least get that ball rolling.

Brittany: So I was going to say, so the statements that you guys sent me for me to say, I just want to make sure that I understood. ***So you're wanting me to say that I resigned my title because of political stances I stood for and that you guys are choosing not to move forward because...***

NIC BLAIZE: No, no, no, no, no. I don't think we said that. No, we're not telling you to resign for your political stance. That's definitely not what we said. Let me go back and look at this statement. Hold on. I got to go back because that's definitely not...

BRITTANY: But basically you guys dethroned me, correct?

NIC BLAIZE: Yeah. So that way it doesn't look as though you're saying that, oh, it's your political stance. We're not at all saying that. It's just basically acknowledging, hey, some of these things were said, you're acknowledging it, but it's not about your stance. ***You're allowed to do that. So this has nothing to do with you not having the freedom to say these things. It's just that saying those things don't align with the organization.***

BRITTANY: ***And the thing is, I was rereading what I said in that one transgender thing. That was my Christian beliefs. Like, is that wrong?***

NIC BLAIZE: No, that's what I'm trying to say. This is not blocking you from believing what you believe or you voting for who you want to vote for. ***It's when you add it all together, when you add the comments, when you add the statement, when you add January 6th, when you add the support of the Tate Brothers, you put it all together.*** That message that's being sent is not one that aligns with what we're saying when it comes to empowering women. Like, how can we empower

women? And then in the next breath, we are supporting guys who say this about women.

BRITTANY: But you just mentioned January 6th. *But see, January 6th was my political stance, the way that I felt. That wasn't degrading anybody. That was just me going to an event that I politically stood for at the time.*

NIC BLAIZE: Right. And when you put that together, when you put that together with someone making a statement about minorities not being oppressed, it's a lot to put together. *And it paints a picture that this person is. So now when I see that this person is saying the N-word, if it was just the N-word, I can say, OK, maybe it's a different context. Right. But when you put that and then you see the person also, in addition to saying these N-word statements, the person now has also said they don't believe minorities are oppressed. You add that together. Then when you see a person saying, okay, based on my Christian beliefs, this is this, you know, I'm saying I support Charlie Kirk. Then you take what Charlie Kirk has said about women, about particularly minority women, that's not adding to that picture. ...When you put it all together, it's painting a picture. Even if that's not who you are, that's the picture that it's painting because it's all together.*

BRITTANY: *And that's what I'm wanting to say in my statement, that because of my political stances of what I prior believed about, including the Andrew Tate part, including everything, I am being dethroned because of that.*

NIC BLAIZE: I mean, Brittany, the thing is this. If you want to say that, Brittany, that's fine. Like we're not. This is a suggested statement. Correct. And that's what. But that. But you can go. You can say whatever you want to say. It's whatever fits with you and you feel good about.

BRITTANY: Yeah, Ms. Nic, and that's what I'm saying.

141. When Brittany demanded written evidence in support of why the ABP and Miss USA Defendants were taking her crown, Defendant Nic Blaize said she had been notified orally and refused to provide written support when Brittany demanded it:

NIC BLAIZE: At no time, Brittany, did we ever say to you that we are dethroning you because you're not allowed to have a particular political affiliation. In fact, we said the opposite.

BRITTANY: That's my point, though. January 6th was my political stance.

NIC BLAIZE: Yeah, and Brittany, you're entitled to that. You are entitled to that.

BRITTANY: Correct, Ms. Nic, and that's what I'm explaining to you, that that's why I'm being dethroned because you're saying all these posts-

NIC BLAIZE: Brittany, you are being dethroned. No, Brittany. Brittany, you are being dethroned, or you have been dethroned because of the totality of every single thing altogether. That's why our statement says, after review of multiple things, it's multiple things. It's not one thing, and it certainly has nothing to do with who you politically support. That is not something that we would ever, if you said to us, oh, you know, I support Donald Trump, or I support Barack Obama, we don't care about those things. It is the defamatory things that you said, and when you add it all together, it's not one thing.

BRITTANY: You have- Correct, and Ms. Nic, this is why I'm going based off the contract you sent me. The contract specifically says title holders that you believe that may be violated specific posts, statement, actions, alleged constitutions, those that violated, basically that you're going to have those in writing. I did not receive those in writing. You're saying things of my past.

NIC BLAIZE: You didn't receive what in writing? I don't know what you mean you didn't receive it. What things did you receive in writing?

BRITTANY: How I violated the contract.

[...]

NIC BLAIZE: This is not one thing, and this is certainly not denying your rights.

BRITTANY: So the combination of the January 6th...

NIC BLAIZE: Brittany, it is the combination of your public statements. It is the combination of your public statements that you acknowledge making. You acknowledge making these statements.

BRITTANY: Because that's my free speech to say what I felt in January 6th.

NIC BLAIZE: And Brittany, you're entitled to free speech, and you're also entitled to, if there's consequences for that free speech.

BRITTANY: But I shouldn't have consequences for something that at first, my belief system as a Christian, and also in the past.

NIC BLAIZE: Brittany, Brittany, Brittany, this is not about your Christian beliefs. **This is about defamatory things that you posted, and you said that were hurtful.** These are the things you said. This is not somebody making it up, or this is not biased against you. We're not biased against you. You are entitled to say what you want to say, but you have to also recognize that the things you're saying are not in line with the organization.

[...]

NIC BLAIZE: Brittany, why didn't you share this with us? [referencing the Tate Brothers post].

BRITTANY: Nic, that was something I believed in years ago. And that was a political stance. That's how I felt. And if it offended somebody, that's not my problem too. You have to understand that too. The way that I felt on that claim is where I felt back then.

NIC BLAIZE: And Brittany, and the way we feel right now is that this doesn't align with the organization. You are more than welcome and we support you. You are more than welcome to make a statement that you feel good about and you feel confident standing behind. **That is fine, but we're not editing our statement. Our position is simple. Our position is clear. It is the totality of your posts.**

142. When asked why the ABP Defendants felt compelled to make a statement online, Defendant Nic Blaize answered: **"Because the national office told us to make the statement. They told us too that we had to make a statement."**

143. The audio recordings prove the following:

- a. Brittany Boltinhouse is not a racist, homophobe, transphobe or bigot.
- b. The ABP Defendants prepared social media statements concerning Brittany's dethroning in coordination with the Miss USA Defendants in an attempt to goad Brittany into a false confession which the Defendants could use to justify their dethroning and public humiliation of her.
- c. The ABP Defendants were willing to go along with the Miss USA Defendants' false narrative that Brittany was a racist, homophobe and transphobe because not because it was true or something the ABP Defendants believed, but because the ABP Defendants feared the Miss USA Defendants' national organization would terminate its relationship with ABP, something the ABP Defendants' business could not afford.
- d. The historic social media posts at issue in which Brittany used the popular slang term "nigga" six times between 2017 and 2019 when she was a teenager were weighed alongside: 1) Brittany's objection to President Biden's National Transgender Day of Visibility; 2) Brittany's support of Charlie Kirk; 3) Brittany's post about social media influencers the Tate brothers; 4) Brittany's support of President Trump in January 2020; 5) a video purporting to show Brittany in a physical altercation as a teenager.

- e. The ABP Defendants decried Brittany’s use of the popular slang term “nigga” on her teenage social media posts, despite themselves having chosen and played the hit Beyoncé song “Heated” which includes “nigga” in its lyrics when Brittany performed in the Fitness competition at the Miss North Carolina USA pageant.
- f. In private calls the ABP Defendants did not know were being recorded, they admitted to Brittany that her old social media posts were not the reason she was being dethroned.

144. Any one or a combination of these instances may very well have otherwise disqualified Brittany to keep the crown of Miss North Carolina USA.

145. As a private pageant, that decision would be the prerogative of the state and national level Defendant organizations.

146. But none of these acts—none of Brittany Boltinhouse’s conduct standing alone, or in their totality—demonstrate she is or ever has been a racist.

147. None of these acts—none of Brittany Boltinhouse’s conduct standing alone, or in their totality—demonstrate she is or ever has been a homophobe.

148. None of these acts—none of Brittany Boltinhouse’s conduct standing alone, or in their totality—demonstrate she is or ever has been a transphobe.

149. None of these acts—none of Brittany Boltinhouse’s conduct standing alone, or in their totality—demonstrate she is or ever has been a bigot who should be shunned from public life.

150. Defendants had no evidence or basis to publish statements that Brittany Boltinhouse was any of these abhorrent things.

151. As a private organization permitted to set its own standards set forth in contractual terms, Defendants election to strip Brittany Boltinhouse of her crown may have been arguably justifiable.

152. Before competing in the state pageant, Plaintiff executed a contestant entry agreement. After Plaintiff won the Miss North Carolina USA 2026 title, Plaintiff and ABP executed a titleholder agreement.

153. The agreements addressed eligibility, participation, use of Plaintiff's name and likeness, pageant administration, and potential removal from the pageant.

154. Plaintiff does not allege that Defendants breached either agreement by removing her title. Plaintiff does not seek rescission, reinstatement, an order restoring her title, an injunction concerning pageant administration, or contract damages.

155. Neither agreement required or permitted any Defendant to publish to the general public that Plaintiff had admitted racist, homophobic, transphobic, or bigoted conduct, had authored or adopted an apology, or had accepted responsibility for such conduct.

156. Plaintiff did not authorize any Defendant to create, attribute, or publish false statements in her name. Any contractual permission to use Plaintiff's name, title, image, likeness, authentic interviews, or authorized content did not include

permission to fabricate a confession, attribute an unapproved apology to Plaintiff, or falsely state or imply that Plaintiff had admitted misconduct.

157. Defendants' defamatory publications were not necessary to effectuate Plaintiff's removal from the Miss USA pageant. After deciding to (wrongfully) remove Plaintiff, Defendants could have announced only that Plaintiff no longer held the title, that she no longer satisfied pageant standards, or that Defendants had exercised contractual discretion. The removal decision and the defamatory publications were distinct causal events.

158. Defendants instead voluntarily chose to publish additional factual assertions and implications to the general public concerning what Plaintiff had supposedly admitted, authored, approved, and apologized for.

159. Plaintiff's claims arise from Defendants' public dissemination of those false factual assertions after Plaintiff rejected the proposed apology. Resolution of whether those assertions were published, false, defamatory, and made with the required degree of fault bears no connection to any agreement Plaintiff signed.

160. To the extent Defendants contend that a release concerning pageant participation or elimination applies, the fabrication and public attribution of a confession and apology was separate from, unnecessary to, and outside the ordinary administration of the pageant, Plaintiff's participation, and the act of removing her title.

161. There can be no justification on these facts—ever—for the Defendants to have published and conspired to publish statements and implications that Brittany

Boltinhouse was a racist, homophobe or transphobe, particularly since those defamatory statements were published after the relationship between Plaintiff and Defendants ended.

162. Moreover, there can be no justification on these facts—ever—for the Miss USA Defendants to have knowingly and falsely stated Brittany had admitted and apologized in her statement for being a racist, homophobe or transphobe.

163. Defendants Ariana Blaize and Nic Blaize drafted, approved, and published these statements on behalf of ABP.

164. Defendants did not publish their coordinated statements in a private or limited setting.

165. Defendants deliberately published their false statements through official social-media accounts and public-facing channels associated with the Miss North Carolina USA and Miss USA pageant systems, knowing and intending that the statements would reach a broad audience, attract media attention, and be repeated, amplified, and republished by third parties.

166. Defendants understood that allegations of racism, homophobia, transphobia, and bigotry against the reigning Miss North Carolina USA would be inherently newsworthy and likely to generate widespread and intensely adverse media coverage.

167. Defendants also knew that members of the media and the public would treat statements issued by ABP, Miss USA, and Brodeur—the state pageant operator, the national pageant organization, and its Chairman, President, and Chief Executive Officer—as authoritative statements concerning Brittany and the reasons for her

removal. The widespread republication and amplification of Defendants' false and defamatory statements and implications were therefore the natural, probable, intended, and reasonably foreseeable consequences of Defendants' coordinated conduct.

168. As Defendants knew or reasonably should have known would occur, news outlets, online publications, social-media accounts, commentators, and members of the public seized upon Defendants' statements and repeated, amplified, and disseminated the false narrative that Brittany was racist, homophobic, transphobic, and a bigot who should be shunned from public life.

169. As Defendants knew or reasonably should have known would occur, news outlets, online publications, social-media accounts, commentators, and members of the public seized upon Defendants' statements and repeated, amplified, and disseminated the false narrative that Brittany had admitted and apologized for such conduct.

170. The resulting onslaught of negative media coverage and online hostility towards Brittany did not arise independently of Defendants' statements.

171. It arose directly from, repeated, relied upon, or was materially shaped by the coordinated public narrative Defendants created and published concerning Brittany and the removal of her title.

172. Defendants' official positions and coordinated statements supplied the apparent credibility and institutional authority that predictably caused the defamatory narrative to spread rapidly beyond Defendants' own accounts and into

local, statewide, national, and online media. The adverse media coverage was and remains devastating to Brittany, her reputation, and her businesses.



Miss North Carolina USA Stripped of Her Crown For Alleged Racist Posts

MISS NORTH CAROLINA USA STRIPPED OF HER TITLE ... Controversial Social Media Posts Resurface



By **TMZ STAFF**

Published **August 6, 2026** 6:26 AM PDT | Updated August 6, 2026 11:50 AM PDT



Available at https://www.t TMZ.com/2026/08/06/miss-north-carolina-usa-dethroned-after-alleged-racist-social-media-posts/#google_vignette (last visited August 21, 2026).

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North Carolina

Miss North Carolina USA stripped of title after alleged racist posts resurface

First runner-up, Myla Hadley, will represent the state at the Miss USA pageant after Brittany Boltinhouse's removal

Edward Helmore

Thu 6 Aug 2026 09.32 EDT

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Brittany Boltinhouse was formally dethroned on Wednesday. Photograph: Brittany Boltinhouse via Instagram

Available at <https://www.theguardian.com/us-news/2026/aug/06/boltinhouse-miss-north-carolina-racist-posts> (last visited August 21, 2026).



POP CULTURE NEWS

Miss North Carolina USA stripped of her crown; pageant says 'standards and values' not upheld

The pageant organizer didn't elaborate on why it removed Brittany Boltinhouse's title. The national group's CEO said it "does not tolerate racism, homophobia, transphobia, nor language that strips any person of their dignity."

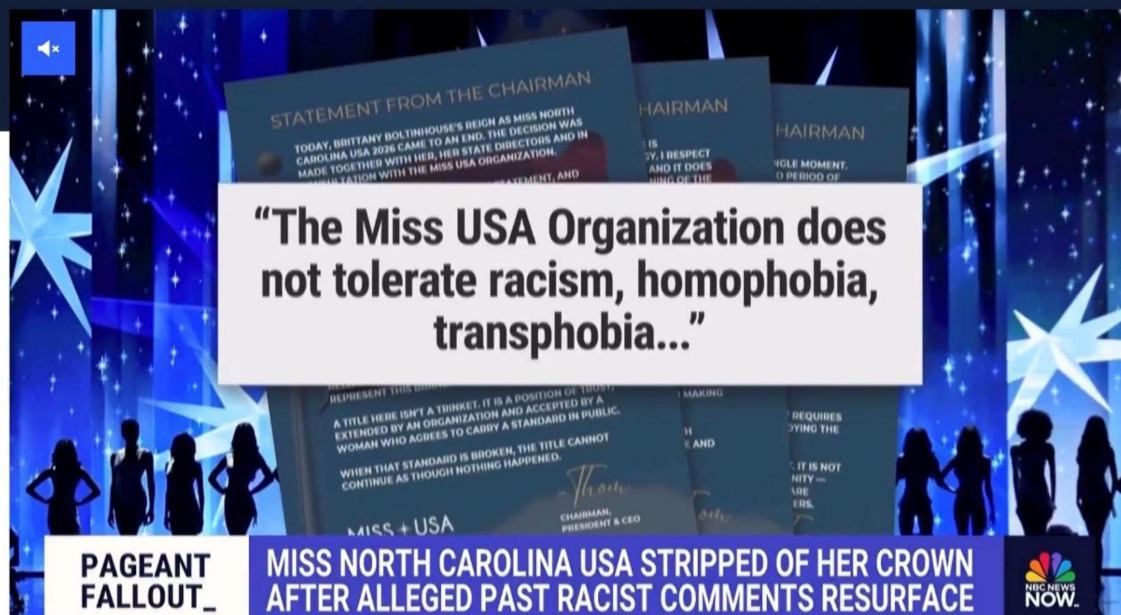
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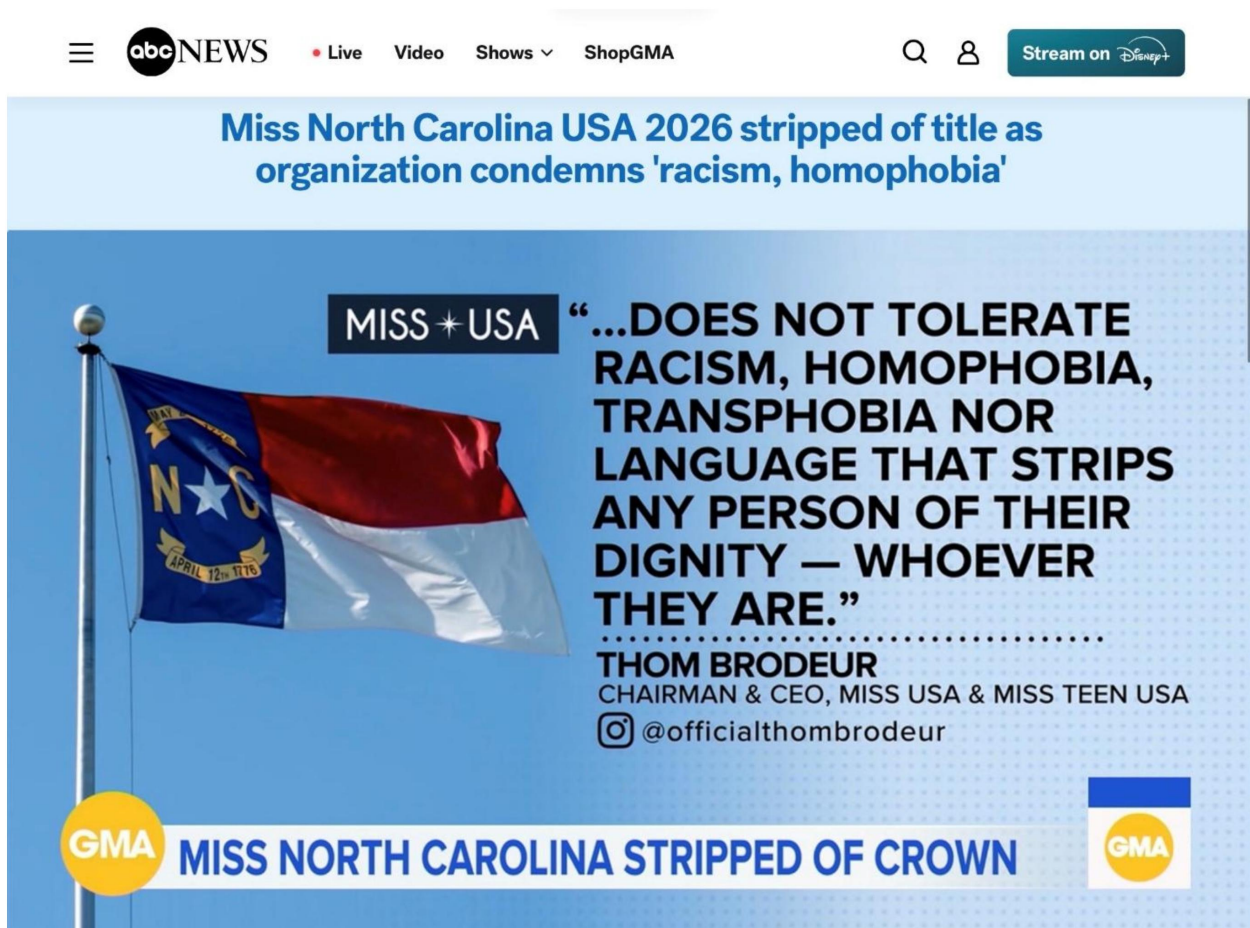
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Available at <https://www.nbcnews.com/video/miss-north-carolina-usa-loses-crown-after-alleged-racist-comments-resurface-267914309645> (August 6, 2026)(last visited August 21, 2026).



Available at <https://abcnews.com/GMA/Culture/miss-north-carolina-usa-2026-stripped-title-organization/story?id=135419917> (August 6, 2026)(last visited August 21, 2026).

173. Within a compressed period of mere weeks, Defendants’ false and defamatory narrative transformed Brittany’s public identity from the newly crowned Miss North Carolina USA 2026 into the target of widespread accusations that she was racist, homophobic, transphobic, and otherwise bigoted.

174. The negative coverage exposed Brittany to public hatred, contempt, ridicule, disgrace, condemnation, harassment, and avoidance. It caused readers and viewers who had no personal knowledge of Brittany or the underlying events to understand

and repeat the false assertion that Brittany possessed reprehensible beliefs and had acknowledged and apologized for them.

175. The adverse coverage magnified the defamatory sting of Defendants' original publications by placing the accusations before audiences far larger than those who followed Defendants' own social-media accounts and by causing the false narrative to appear across search results, online archives, social-media feeds, and other enduring digital channels associated with Brittany's name.

176. Because internet publications and search results remain readily accessible, the harm caused by Defendants' conduct is continuing.

177. People searching Brittany's name—including prospective employers, sponsors, business partners, pageant organizations, media outlets, clients, and members of the public—are likely to encounter the adverse coverage and the false defamatory narrative generated by Defendants.

178. The permanence and accessibility of the online coverage have impaired and will continue to impair Brittany's ability to restore her reputation, obtain employment and professional opportunities, secure sponsorships and endorsements, participate in pageants and public appearances, develop a public-facing career, and enjoy the professional and economic benefits associated with the Miss North Carolina USA 2026 title.

179. Defendants intended to present a unified public justification for their conduct and knew that the media would repeat that justification.

180. At a minimum, Defendants acted with reckless disregard for the obvious and foreseeable likelihood that their statements would be republished and would cause severe and lasting reputational and economic harm to Brittany.

181. The adverse media coverage and its continuing dissemination were not remote, extraordinary, or superseding events. They were the direct, natural, probable, and foreseeable results of Defendants' decision to coordinate and publish false and defamatory statements and implications about Brittany through prominent institutional and executive channels.

182. The defamatory publications by the ABP Defendants and Miss USA Defendants operated together and reinforced one another.

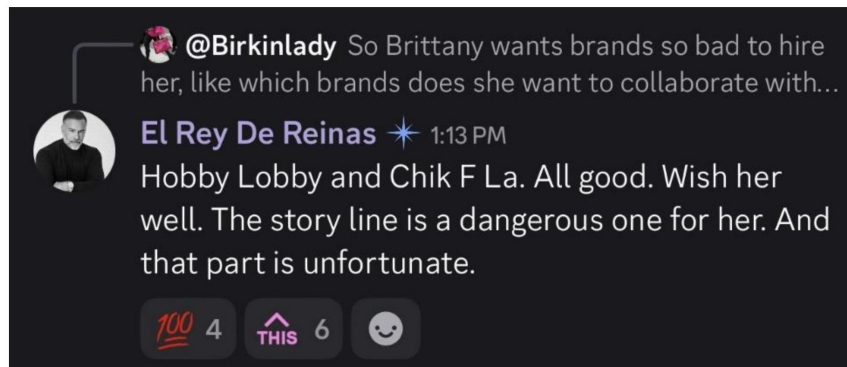
183. The ABP Defendants' statement invoked its consultations with Miss USA, while the Miss USA Defendants' statement invoked the state organizers and falsely represented that he had "seen" Brittany's statement and apology.

184. This coordinated presentation caused third parties to understand that the state and national organizations agreed that Brittany had engaged in and admitted to racist, homophobic, and transphobic conduct.

185. Each Defendant participated in, authorized, directed, encouraged, assisted, adopted, amplified, or ratified the public narrative that foreseeably generated the adverse coverage.

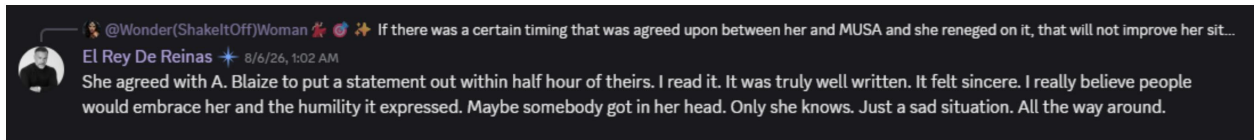
186. Defendant Brodeur went a step further, posting in an online pageant forum that if Brittany wanted any future brand collaborations, she should look to Hobby

Lobby and “Chik F La,” [sic] an obvious reference to Brittany’s conservative Christian values¹¹:



187. Subsequently, Defendant Brodeur posted an implicit admission that Brittany did not make the statement he publicly attributed to her, stating that she had considered putting out her own, different statement:

¹¹ See *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 690–91, 726 (2014) (holding that Religious Freedom Restoration Act barred application of the Affordable Care Act’s contraceptive-coverage requirement to a closely held corporation whose owners objected on religious grounds); see also Chick-Fil-A Re-Evaluates Funding for Anti-Gay Marriage Groups, ABC News (Sept. 19, 2012), <https://abcnews.go.com/blogs/politics/2012/09/chick-fil-a-re-evaluates-funding-for-anti-gay-marriage-groups> (reporting Chick-fil-A’s public association with its chief executive’s support for “the biblical definition of the family unit” and donations to organizations opposing same-sex marriage)(last visited August 21, 2026); see also *New York Bill Could Interfere With Chick-fil-A’s Long-Standing Policy to Close Sundays*, Associated Press (Dec. 21, 2023), <https://apnews.com/article/17e5a44140f0cb383fa31429bf66184b> (reporting that Chick-fil-A’s founder infused the company’s business practices with conservative Christian values, that the company faced opposition based on the founder’s opposition to same-sex marriage, and that it had faced boycotts concerning financial support for groups opposing same-sex marriage)(last visited August 21, 2026). Together, these references support the allegation that Defendant Brodeur’s paired “Hobby Lobby” and “Chik F La” [sic] comment invoked businesses publicly associated with conservative Christian views like Brittany’s.



188. A text message from Defendant Ariana Blaize also highlights that it was not purported homophobia she took issue with, but Brittany’s political leanings. In the text, Defendant Ariana Blaize instructed Brittany to take down her Facebook page so that political messages (“i.e., “MAGA stuff”, referring to President Trump’s slogan for Make America Great Again) would not be seen:



189. Shortly after sending this message, Defendant Ariana Blaize showed Brittany a message the ABP Defendants received from a member of the public complaining that Brittany supports Donald Trump.

190. Defendant Ariana Blaize followed this up with the statement: “Everyone knows now” and a string of screenshots evidencing that Brittany is a conservative who supports President Trump.

191. There were no mentions of racism, homophobia, or transphobia during this communication.

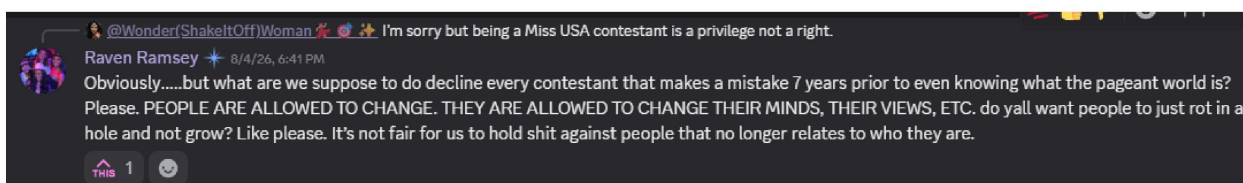
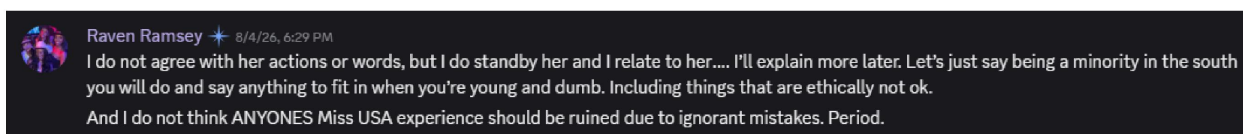
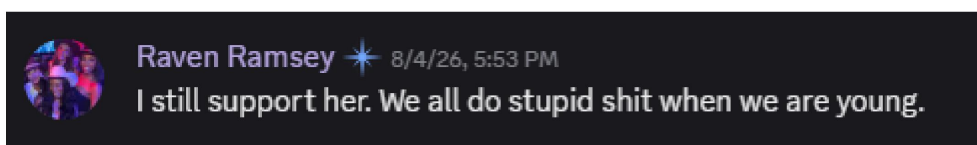
192. In a similar communication with Defendant Nic Blaize, Brittany was told that certain members of the public were “ganging up” on Brittany but not to worry because “God has you covered and highly favored!”

193. Defendant Nic Blaize did not mention racism, homophobia, or transphobia during this communication.

194. In another audio recording, Defendant Ariana Blaize admitted that she took no issue with the conduct Defendants would ultimately claim led to Brittany’s dethronement. Defendant Ariana Blaize told Brittany in a recorded call:

“We’ve gotten to know Brittany, and we want to just make sure that these people that are trying to maliciously take this away from her, their narrative is not the only narrative that’s being put out there... And it’s false. And it’s also wrong.”

195. Even Defendant Miss USA employees did not take issue with Brittany’s social media posts. Raven Ramsey, the right-hand employee, representative and agent of the Miss USA Defendants, stated:



196. The resulting harm was inflicted pursuant to and in furtherance of the conspiracy alleged in this Complaint.

197. The adverse media coverage was therefore a direct and proximate consequence of Defendants' defamation and civil conspiracy and was within the scope of the risk that made Defendants' conduct wrongful.

198. As a direct and proximate result of Defendants' conduct and the foreseeable adverse coverage it generated, Brittany has suffered and continues to suffer substantial injury to her name, reputation, her businesses, standing in the community, personal and professional relationships, career, livelihood, and future economic opportunities.

199. Brittany has further suffered humiliation, embarrassment, mental anguish, emotional distress, loss of enjoyment of life, and the burden and expense of investigating, monitoring, responding to, and attempting to mitigate the false narrative and adverse coverage generated by Defendants.

200. Brittany's damages include, without limitation, presumed and general damages arising from libel *per se*; special and consequential damages associated with lost pageant, sponsorship, endorsement, promotional, appearance, media, employment, and career opportunities; mitigation expenses; and all other damages recoverable by law, in amounts to be established through discovery and proved at trial.

201. The audience, scope, and content of the publications exceeded any occasion that could support a qualified common-interest privilege.

202. Alternatively, any qualified privilege was abused and defeated because the Defendants published with actual malice, communicated the statements to persons without a corresponding interest, and used the occasion to attribute to Brittany a confession and apology she had not made.

203. Particularly after the contract with Brittany had been terminated, any authority Defendants possessed to administer the pageant or remove Plaintiff's title did not authorize them to fabricate or publish false factual assertions or defamatory implications concerning what Plaintiff had admitted, authored, approved, or apologized for.

FIRST CLAIM FOR RELIEF

**Defamation—Libel *per se* / Defamatory Implication / Libel *per quod*—
(Against All Defendants)**

204. Brittany realleges and incorporates by reference all preceding paragraphs of this Complaint as if fully set forth herein.

205. Defendants ABP, Ariana Blaize, Nic Blaize, Miss USA, and Brodeur jointly participated in a coordinated course of conduct concerning the removal of Brittany's Miss North Carolina USA 2026 title and the public statements Defendants issued about Brittany and that removal.

206. Before publication, ABP, Ariana Blaize, and Nic Blaize engaged in multiple conversations and consultations with Miss USA and its Chairman, President, and Chief Executive Officer, Brodeur, concerning Brittany, her title, her historic social-media posts, the public response to those posts, and the statements Defendants would publish.

207. The Miss USA Defendants directed the ABP Defendants to issue a public statement concerning Brittany, and the ABP Defendants acted pursuant to that direction.

208. Defendant ABP, acting through Defendants Ariana Blaize and Nic Blaize, prepared and transmitted to Brittany a proposed statement that Defendants pressured Brittany to publish as her own statement because the ABP Defendants needed to show control, compliance and cooperation to the Miss USA Defendants to preserve their standing as a state-level pageant operator in 2027.

209. In other words, the ABP Defendants' motive to defame and serve Brittany up to the online mob was purely and financially self-interested.

210. The proposed statement asserted, among other things, that Brittany's "past actions and public statements" had become a distraction from the mission and purpose of the title; that Brittany had been "forced to confront parts of [her] past that [she was] not proud of"; that her words and actions had hurt or disappointed others; that she took "full responsibility"; that she offered a "sincere apology;" and that leadership required "accountability."

211. Brittany did not author, approve, adopt, sign, publish, or authorize the proposed statement.

212. Brittany specifically refused to admit that she was racist, homophobic, transphobic, or otherwise bigoted because those accusations were false, untrue, and categorically denied.

213. Notwithstanding Brittany's refusal, the Miss USA Defendants subsequently published a statement to a broad online audience stating that he had seen Brittany's statement and apology and presenting Brittany as having acknowledged and apologized for racist, homophobic, and transphobic conduct.

214. The Miss USA defendants further stated, in substance, that Brittany was "at the center" of the controversy; that she had been publicly "named, examined, and judged"; and that she remained a person with a family, future, and life beyond that part of her journey.

215. The Miss USA Defendants expressly acknowledged that this statement was made together with the "state organizers," meaning Defendants ABP, Ariana Blaize, and Nic Blaize, and this statement followed and amplified ABP's coordinated public statement.

216. Viewed in their entirety and in the context in which Defendants published them, Defendants' coordinated statements expressly stated or naturally, reasonably, and unmistakably stated and implied the following purported facts concerning Brittany:

- a. Brittany was racist, homophobic, transphobic, and a bigot;
- b. Brittany had engaged in racist, homophobic, and transphobic misconduct;
- c. Brittany had admitted that her words and conduct were racist, homophobic, or transphobic;
- d. Brittany had authored, approved, or adopted a written confession and apology accepting responsibility for such conduct; and

- e. Brittany's removal as Miss North Carolina USA 2026 resulted from her admitted racism, homophobia, transphobia, or bigotry.

217. These express and implied factual assertions were false, untrue and categorically denied.

218. Brittany Boltinhouse is not racist, homophobic, transphobic, or a bigot.

219. Brittany Boltinhouse did not admit that she was any of those things.

220. Brittany Boltinhouse did not author, approve, adopt, sign, publish, or authorize the proposed confession and apology Defendants prepared for her.

221. The Defendants' conduct depended on the lie of Brittany's false confession to tarnish Brittany publicly and justify the pretextual reason for stripping her of the Miss North Carolina USA crown.

222. The Defendants' conduct depended on the lie of Brittany's false confession because Defendants' knew the true basis and pretext of Brittany's removal was the public political stances she had taken in support of President Trump, conservative activist Charlie Kirk, and her objection to President Biden's National Transgender Day.

223. The ABP Defendants' own recorded statements confirm that they did not possess evidence establishing that Brittany was racist, homophobic, transphobic, or a bigot and that their decision-making instead concerned the "totality" of historic posts, anticipated public-relations consequences, and the perceived threat to ABP's continued status as a state-level director.

224. Defendants knew that the express and implied factual assertions were false because Defendants knew that they—not Brittany—had prepared the proposed confession and apology; knew that Brittany had rejected it; knew that Brittany had never admitted to racism, homophobia, transphobia, or bigotry; and knew the actual considerations discussed during their calls with Brittany.

225. Alternatively, Defendants acted willfully, wantonly and with reckless disregard for the truth or falsity of the express and implied factual assertions and with a high degree of awareness that those assertions were probably false.

226. Defendants intended their audience to understand the defamatory meaning described above, or acted with reckless disregard as to whether their audience would understand that meaning.

227. Members of Defendants' vast online audience did, in fact, understand Defendants' coordinated statements to mean that Brittany was racist, homophobic, transphobic, and a bigot and that Brittany had admitted and apologized for being so.

228. Defendants published or caused the publication of the defamatory statements and implications to third parties through Instagram and other online channels accessible to a broad public audience.

229. The publications were of and concerning Brittany because they identified Brittany by name, title, image, circumstances, or other information that made her identity apparent to their audience.

230. The publications asserted or implied objectively verifiable facts concerning what Brittany believed, what she had done, what she had admitted, whether she had

authored or adopted an apology, and the purported factual basis for removing her title; they were not protected expressions of pure opinion.

231. The publications were not privileged, authorized, consented to, or otherwise justified.

232. Any authority, contractual or otherwise, Defendants may claim concerning administration of the pageant or removal of Brittany's title did not authorize them to fabricate or publish future false factual assertions or defamatory implications concerning Brittany.

233. Defendants' publications constitute libel *per se* because, when considered in their full context, they tend to subject Brittany to public hatred, contempt, ridicule, disgrace, and avoidance and tend to impeach Brittany in her trade, her businesses, her profession, and prospective career as a public-facing titleholder, spokesperson, and pageant participant.

234. Because the publications constitute libel *per se*, malice and general damages are presumed.

235. Alternatively, Defendants' publications were susceptible to at least two interpretations, one defamatory and one nondefamatory; Defendants intended the defamatory interpretation, and the publications were so understood by the persons who viewed them.

236. Further in the alternative, Defendants' publications constitute libel *per quod* because, when considered with the surrounding facts, innuendo, colloquium, and explanatory circumstances alleged in this Complaint—including Defendants'

coordinated removal of Brittany's title, the ABP Defendants' proposed confession and apology, Brittany's rejection of that confession, and the Miss USA Defendants' subsequent representation that he had "seen" Brittany's statement and apology—the publications conveyed the above-alleged false defamatory meaning.

237. As a direct and proximate result of Defendants' libel *per quod* and the resulting injury to Brittany's reputation, Brittany suffered special damages, including lost pageant-related, promotional, sponsorship, appearance, media, professional, and career opportunities; lost business and economic opportunities; and reasonable expenses incurred to investigate, mitigate, and respond to Defendants' publications, in amounts to be established through discovery and proved at trial. Brittany seeks these damages for harm caused by the alleged defamatory publications and not for the removal of her title, the loss of an opportunity to compete in the 2026 Miss USA pageant, or any alleged breach of a pageant or titleholder agreement.

238. As a direct and proximate result of Defendants' conduct, Brittany has also suffered injury to her reputation and standing in the community, humiliation, embarrassment, mental anguish, emotional distress, and other general, specific and consequential damages.

239. Defendants' conduct was willful, wanton, malicious, and undertaken with knowledge of Brittany's rights and with conscious and intentional disregard of and indifference to her rights.

240. As a direct and proximate result of Defendants' misconduct, Brittany suffered damages in an amount to be proven at trial and exceeding \$25,000.

SECOND CLAIM FOR RELIEF
Civil Conspiracy to Defame Brittany
(Against All Defendants)

241. Brittany realleges and incorporates by reference all preceding paragraphs of this Complaint as if fully set forth herein.

242. Defendants ABP, Ariana Blaize, Nic Blaize, Miss USA, and Brodeur formed an agreement, combination, or common scheme to remove Brittany's title and to prepare, coordinate, publish, and amplify statements that would portray Brittany to the public as racist, homophobic, transphobic, and a bigot and as having admitted and apologized for being so.

243. The agreement and common scheme are evidenced by, among other things:

- a. The multiple conversations and consultations between the ABP Defendants and Miss USA Defendants before the publications;
- b. the Miss USA Defendants' direction that the ABP Defendants issue a public statement;
- c. the Miss USA Defendants' warning that the ABP Defendants would bear the public-relations consequences if the ABP Defendants retained Brittany as titleholder and the ABP Defendants' resulting concern that it could lose its state-level directorship;
- d. the ABP Defendants' preparation and transmission to Brittany of a proposed confession and apology intended for publication in Brittany's name;
- e. Brittany's refusal to approve or publish that proposed confession and apology;
- f. the ABP Defendants' publication of its statement after consulting with the Miss USA Defendants;

- g. the Miss USA Defendants' subsequent publication falsely stating that Defendant Brodeur had "seen" Brittany's statement and apology;
- h. the Miss USA Defendants' acknowledgment that Defendant Brodeur's social media statement was made together with the ABP Defendant state organizers; and
- i. The coordinated and mutually reinforcing timing, content, purpose, and effect of Defendants' publications.

244. Pursuant to and in furtherance of the common scheme, the ABP Defendants gathered and evaluated Brittany's historic posts, communicated with the Miss USA Defendants, prepared the proposed false confession and apology, pressured to obtain Brittany's approval of it before abandoning when she refused, and published the ABP Defendants' coordinated public statement.

245. Pursuant to and in furtherance of the common scheme, the Miss USA Defendants instructed the ABP Defendants to issue a false confession and public statement, participated in the consultations concerning Brittany and the response to the controversy, applied pressure concerning the consequences of retaining Brittany, and approved, authorized, encouraged, ratified, or participated in the coordinated publication strategy.

246. Pursuant to and in furtherance of the common scheme, the Miss USA Defendants published Defendant Brodeur's statement to a broad online audience, claimed to have "seen" Brittany's statement and apology despite Brittany's rejection

of the document prepared for her, and expressly associated his publication with the state organizers.

247. The preparation and publication of the false and defamatory statements and implications alleged in First Claim above were wrongful acts committed by one or more Defendants pursuant to the common scheme and in furtherance of its objective.

248. Each conspirator knew the essential objective of the common scheme, agreed to participate in it, and committed, directed, authorized, encouraged, assisted, adopted, amplified, or ratified one or more acts in furtherance of it.

249. The coordinated publications were designed and intended to present a unified public narrative that justified Defendants' actions by falsely portraying Brittany as racist, homophobic, transphobic, and a bigot and by falsely representing that Brittany had acknowledged and apologized for such conduct.

250. Defendants' agreement may be inferred from their communications, consultations, coordinated conduct, common purpose, sequence of actions, mutually reinforcing publications, and Brodeur's express acknowledgment that he and Defendant Miss USA acted together with the state organizers.

251. The underlying defamation alleged in First Claim supplies the wrongful acts necessary to impose civil-conspiracy liability.

252. The acts of each conspirator undertaken pursuant to and in furtherance of the common scheme are attributable to the other conspirators to the extent permitted by law.

253. As a direct and proximate result of the conspiracy and the wrongful acts committed in furtherance of it, Brittany suffered the injuries and damages alleged above, including reputational injury, humiliation, embarrassment, mental anguish, emotional distress, loss of the economic and professional value of her title, losses to her businesses, loss of the opportunity to compete in the 2026 Miss USA pageant, loss of pageant-related and career opportunities, and mitigation expenses.

254. Defendants' conspiratorial conduct was willful, wanton, malicious, and undertaken with knowledge of Brittany's rights and with conscious and intentional disregard of and indifference to those rights.

255. As a direct and proximate result of Defendants' misconduct, Brittany suffered damages in an amount to be proven at trial and exceeding \$25,000.

ENTITLEMENT TO PUNITIVE DAMAGES
(Against All Defendants)

256. Brittany realleges and incorporates by reference all preceding paragraphs of this Complaint as if fully set forth herein.

257. Brittany is entitled to recover compensatory damages from Defendants on the claims alleged in this Complaint.

258. The aggravating factors of malice and willful or wanton conduct were present in, related to, and proximately caused the injuries for which Brittany seeks compensatory damages.

259. Defendants acted with malice toward Brittany. Defendants' personal ill will toward Brittany on account of her political and religious beliefs, and their intent to protect their own institutional, commercial, and reputational interests at Brittany's

expense, activated and incited their decision to prepare, coordinate, publish, and amplify the false and defamatory statements and implications alleged in this Complaint.

260. Defendants also engaged in willful or wanton conduct by consciously and intentionally disregarding and remaining indifferent to Brittany's rights, despite knowing or having reason to know that their conduct was reasonably likely to cause substantial injury to Brittany's reputation, career, livelihood, emotional well-being, and future opportunities.

261. The conduct supporting punitive damages includes, without limitation, the following particularized acts and circumstances:

- a. Defendants knew Brittany had not authored, approved, adopted, signed, published, or authorized the proposed confession and apology that the ABP Defendants prepared for her;
- b. Defendants knew Brittany had expressly rejected the proposed confession and apology and had refused to admit that she was racist, homophobic, transphobic, or a bigot;
- c. Defendants nevertheless published or caused the publication of statements expressly stating or falsely implying that Brittany had issued, approved, or adopted a statement and apology admitting and accepting responsibility for racist, homophobic, transphobic, or bigoted conduct;

- d. Defendants Brodeur and Miss USA publicly represented that Brodeur had “seen” Brittany’s statement and apology even though the document to which he referred had been prepared by the ABP Defendants and rejected by Brittany;
- e. Defendant Brodeur expressly associated his publication with the state organizers, including ABP, Ariana Blaize, and Nic Blaize, thereby presenting the defamatory narrative as the coordinated and authoritative position of both the national and state pageant organizations;
- f. the Miss USA Defendants directed the ABP Defendants to issue a public statement and participated in the consultations and coordinated publication strategy concerning Brittany;
- g. Defendants used their organizational positions, official social-media accounts, public prominence, and access to a broad online audience to lend credibility to and maximize the reach and injurious effect of the false statements and implications;
- h. Defendants acted despite knowing that their own recorded discussions did not establish that Brittany was racist, homophobic, transphobic, or a bigot and instead reflected concerns about public-relations consequences, institutional branding, and the ABP Defendants’ continued state-level directorship;

- i. Defendants attempted to obtain Brittany's endorsement of a statement accepting responsibility and apologizing for conduct and beliefs Brittany denied, then proceeded with a publication strategy that falsely conveyed substantially the same admission after Brittany refused;¹²
- j. Defendants coordinated the timing, content, and amplification of their statements to present a unified public narrative concerning Brittany;
- k. Defendants knew that labeling or portraying Brittany as racist, homophobic, transphobic, and a bigot would expose her to public hatred, contempt, ridicule, disgrace, avoidance, professional harm, and loss of future opportunities; and
- l. Defendants proceeded with the publications despite recognizing that Brittany was being publicly named, examined, and judged and that the controversy threatened her family, future, reputation, and life beyond the pageant.

¹² Defendants did not merely reproduce Brittany's historic posts and invite readers to form their own conclusions. By invoking an apology and statement allegedly seen by Defendant Brodeur, Defendants represented that they possessed additional, nonpublic evidence—Brittany's own admission and acceptance of responsibility. That purported additional fact did not exist. The false attribution materially changed the gist and sting of the publications. A reasonable reader could distinguish between disputed historic language and a present admission by Brittany that she had engaged in racist, homophobic, transphobic, or bigoted misconduct. The attributed apology communicated consciousness of wrongdoing and supplied apparent corroboration from Brittany herself.

262. Defendant Brodeur personally participated in the conduct constituting the aggravating factors by preparing, approving, authorizing, and publishing his statement; by falsely representing that he had seen Brittany's statement and apology; and by coordinating or acting together with the state organizers.

263. Defendants Ariana Blaize and Nic Blaize personally participated in or condoned the conduct constituting the aggravating factors by communicating and consulting with Defendant Miss USA; gathering and evaluating Brittany's historic posts; participating in the decision and public-response strategy; preparing, approving, transmitting, or attempting to secure Brittany's approval of the proposed confession and apology; and preparing, approving, authorizing, publishing, or ratifying ABP's public statement.

264. As Chairman, President, and Chief Executive Officer of Miss USA, Defendant Brodeur was an officer, director, manager, and policymaking agent of Miss USA. His participation in and publication of the defamatory narrative constitutes direct participation and managerial participation by Defendant Miss USA in the aggravating conduct.

265. Defendant Brodeur acted within the course and scope of his authority for Defendant Miss USA, used his official position to address the controversy, and had authority to formulate, approve, announce, or implement Miss USA's position concerning Plaintiff and the coordinated public response.

266. Defendants Ariana Blaize and Nic Blaize were directors, managers, and policymaking agents of Defendant ABP. Their participation in, approval of, and

condonation of the conduct alleged above constitutes direct and managerial participation by Defendant ABP in the aggravating conduct.

267. Defendants Ariana Blaize and Nic Blaize acted within the course and scope of their authority for ABP and possessed authority to formulate, approve, announce, and implement ABP's position concerning Brittany, her title, the proposed confession and apology, and ABP's public statement.

268. Defendants Miss USA and ABP are not alleged to be liable for punitive damages solely under principles of vicarious liability. Their officers, directors, or managers personally participated in, approved, authorized, directed, condoned, and ratified the conduct constituting the aggravating factors giving rise to punitive damages.

269. Defendants' conduct was not an isolated mistake, negligent misstatement, or inadvertent publication. It was a deliberate and coordinated course of conduct undertaken after consultation, discussion, preparation of a proposed statement, Brittany's express rejection of that statement, and Defendants' consideration of the foreseeable public and professional consequences to Brittany.

270. Defendants' conduct was especially reprehensible because Defendants possessed superior institutional authority and access to a broad public audience; used that authority to publish a false and damaging narrative concerning Brittany; attempted to attribute an unapproved confession and apology to Brittany; and acted to protect their own commercial, branding, licensing, and public-relations interests while consciously transferring the foreseeable reputational harm to Plaintiff.

271. The aggravating factors of malice and willful or wanton conduct directly relate to the defamation, conspiracy, and resulting injuries alleged in this Complaint.

272. Brittany is prepared to prove the aggravating factors supporting punitive damages by clear and convincing evidence.

An award of punitive damages is necessary and appropriate to punish Defendants for their egregiously wrongful conduct and to deter Defendants and others from engaging in similar conduct.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Brittany Alondra Boltinhouse respectfully requests that the Court enter judgment in her favor and against Defendants, and grant the following relief:

1. An award of compensatory damages in an amount to be determined by the jury for all injuries proximately caused by Defendants' wrongful conduct, including injury to Brittany's reputation and standing in the community, humiliation, embarrassment, mental anguish, emotional distress, and loss of professional and economic opportunities;
2. An award of presumed and general damages arising from Defendants' *libel per se*, to the extent permitted by law;
3. An award of special and consequential damages in an amount to be determined by the jury, including the lost economic and professional value of the Miss North Carolina USA 2026 title; the lost opportunity to compete in the 2026 Miss USA pageant; lost pageant-related, promotional, sponsorship, endorsement, appearance,

media, and career opportunities; and reasonable expenses incurred to investigate, mitigate, and respond to Defendants' publications and conduct;

4. An award of nominal damages on any claim for which a violation of Plaintiff's rights is established but the jury does not award compensatory damages;

5. An award of punitive damages against each Defendant in an amount to be determined by the jury, upon proof by clear and convincing evidence of the aggravating factors alleged in this Complaint and subject to applicable law;

6. To the extent Plaintiff asserts and prevails on a claim under Chapter § 1D-1 of the North Carolina General Statutes, an award of punitive damages, and all other relief authorized by law;

7. A determination that Defendants participating in the civil conspiracy are jointly and severally liable, to the extent permitted by law, for the damages proximately caused by the wrongful acts committed pursuant to and in furtherance of the common scheme;

8. An award of prejudgment and post-judgment interest at the maximum lawful rates;

9. An award of Brittany's taxable costs and expenses of this action;

10. An award of reasonable attorneys' fees to the extent authorized by statute or other applicable law;

11. A trial by jury on all issues so triable; and

12. Such other and further legal or equitable relief as the Court deems just and proper.

This the 23rd day of August 2026.

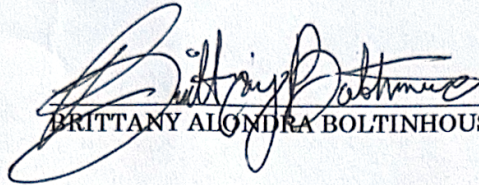
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VERIFICATION

BRITTANY ALONDRA BOLTINHOUSE, being first duly sworn by and before the undersigned notary public, says that she is a Plaintiff in the foregoing civil action; that she has read the foregoing Complaint; and that the same is true to her own knowledge, except matters stated therein on information and belief, and as to those matters, she believes the same to be true.


BRITTANY ALONDRA BOLTINHOUSE

Subscribed and sworn to before me,

This 20th day of August, 2026.


NOTARY PUBLIC

My commission expires: 10/31/27

