

1 BROWN RUDNICK LLP  
CAMILLE M. VASQUEZ, #273377  
2 cvasquez@brownrudnick.com  
HONIEH O.H. UDENKA, #319103  
3 hudenka@brownrudnick.com  
2211 Michelson Drive, 7th Floor  
4 Irvine, California 92612  
Telephone: (949) 752-7100  
5 Facsimile: (949) 252-1514

Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
7/12/2024 10:35 AM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By Y. Ayala, Deputy Clerk

6 Attorneys for Plaintiffs  
AMANDA GHOST, GREGOR CAMERON, and  
7 VINCE HOLDEN

8  
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF LOS ANGELES

11 AMANDA GHOST, an individual; GREGOR  
CAMERON, an individual; and VINCE  
12 HOLDEN, an individual,

CASE NO. **24STCV17314**  
**COMPLAINT FOR DEFAMATION**

13 Plaintiffs,

14 vs.

15 REBEL WILSON, an individual; and DOES  
1-50, inclusive,

16 Defendants.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Plaintiffs, Amanda Ghost (“Ms. Ghost”), Gregor Cameron (“Mr. Cameron”), Vince Holden  
2 (“Mr. Holden”) (collectively, the “Plaintiffs”), allege on personal knowledge as to themselves and  
3 their own conduct, and on information and belief as to all other matters, as follows:

4 **NATURE OF THE ACTION**

5 1. Defendant Rebel Wilson (“Rebel” or “Defendant”) has a history of fabricating false  
6 and malicious lies to hide her own lack of professionalism and advance her own self-interest. This  
7 lawsuit is about holding Rebel accountable for her attempts to bully Plaintiffs into conceding to her  
8 unreasonable demands by spreading vicious lies without regard for the irreparable damage her  
9 reckless words would cause on the hard-earned personal and professional reputations of Plaintiffs.

10 2. For years, Rebel has played the affable funny girl on the big screen and, off screen,  
11 portrayed herself as a champion of other female artists and whistleblower against abusive conduct  
12 within the film industry. This public persona, however, is a farce. Rebel is a bully who will  
13 disregard the interests of others to promote her own. She falsely accused a fellow actor of  
14 inappropriate behavior to publicize her book. She granted a young artist a scholarship to develop a  
15 screenplay for “The Deb” (the “Film”), and then tried to claim writing credit for herself. And,  
16 when Rebel did not get her way in business negotiations with the Plaintiffs concerning “The Deb”  
17 (including the writing credit), Rebel tried to intimidate Plaintiffs into giving her what she wanted  
18 by leveraging her persona and platform, with many millions of followers, to spread malicious lies  
19 about the Plaintiffs.

20 3. Plaintiffs are well-respected film professionals, with decades of experience in the  
21 entertainment industry, who made the ill-fated decision to help Rebel make her directorial debut.  
22 Ms. Ghost is an award-winning song writer and music executive, a wife, and a mother. Mr.  
23 Cameron, Ms. Ghost’s partner, is also a father and a film producer. Mr. Holden is a father, a  
24 husband, and has a 30-year unblemished reputation as a risk manager in the industry.

25 4. Plaintiffs contracted to work with Rebel on a musical film called “The Deb” (the  
26 “Film”) (ironically, a film highlighting the dangers of cancel culture), which was written by  
27 Hannah Reilly and adapted from a stage play that Reilly wrote with songs composed by Reilly and  
28 Megan Washington. Rebel’s production company, Camp Sugar Productions Pty Ltd., had

1 acquired the rights to the script, but needed financial and industry buy-in to get the project off the  
2 ground. Enter the Plaintiffs.

3         5.         The Plaintiffs took a chance on Rebel, a well-known actor, but a novice when it  
4 came to directing and producing a film. Rebel needed the Plaintiffs to bring “The Deb” to the big  
5 screen, and Plaintiffs were willing to lend their resources to the Film, reasonably expecting that  
6 Rebel would approach the opportunity with care, diligence, and professionalism.

7         6.         The Plaintiffs invested in Rebel and “The Deb,” and reasonably asked Rebel to be  
8 invested professionally (but not financially) as well. Rebel was expected to collaborate with the  
9 Plaintiffs in good faith, stay on schedule, and behave professionally when on the job. This,  
10 apparently, was too much to ask of her. She flatly refused to collaborate with Plaintiffs, absconded  
11 from the Film for months at a time, behaved unprofessionally with employees of the Film, and  
12 repeatedly made unauthorized and improper disclosures about the Film. The Film thrived in spite  
13 of Rebel’s reckless conduct. But, because Rebel shirked her professional obligations to the  
14 Plaintiffs, the Film, and everyone dedicated to its success, she started flailing and inventing  
15 problems to obfuscate her own failures.

16         7.         The dispute between Plaintiffs and Rebel came to a head when Rebel sought to seize  
17 writing credit for the Film from Reilly, a young, upcoming writer and Rebel’s own scholarship  
18 recipient, notwithstanding a binding decision from the Australian Writer’s Guild that such credit  
19 belongs to Reilly. Rebel also fought for credit with the writers of the music for the Film, and  
20 demanded that Plaintiffs provide her a record label with an external music group (a demand which  
21 was well outside of Plaintiffs’ power to provide). Rebel’s goal in these several disputes was to get  
22 credit for work she did not do, and to overshadow young, upcoming artists who truly deserved the  
23 credit.

24         8.         When Rebel did not get her way in this these disputes, she revived a fictitious story  
25 about Ms. Ghost sexually harassing a lead actor in “The Deb” that has absolutely no basis in  
26 reality, as the actor that is the subject of this defamatory tale has repeatedly confirmed. In addition,  
27 Rebel claimed, without any basis, that Ms. Ghost and Mr. Cameron were embezzling from the  
28 Film’s budget. These statements are false, and Rebel knew they were false at the time she made

1 them. Rebel knew that the actress at issue had repeatedly and unequivocally denied any form of  
2 wrongful conduct by Plaintiffs, but Rebel doubled down on her false story to promote her own  
3 selfish interests in her disputes with Plaintiffs, without regard for the Plaintiffs or the young,  
4 upcoming lead actress who she dragged into the center of her malicious scheme.

5 9. By the summer of 2024, approximately \$22 million had been invested in the Film,  
6 all work was nearly complete, and it was on track to be a resounding success notwithstanding  
7 Rebel's efforts at sabotage. The Film was selected to premiere at the prestigious closing spot of the  
8 Toronto International Film Festival ("TIFF"), but Plaintiffs had to consider carefully whether to  
9 proceed with marketing the Film while it was embroiled in numerous credit and licensing disputes  
10 instigated by Rebel. Plaintiffs continuously attempted to resolve the disputes in good faith but  
11 Rebel had other ideas. Even though the plan was always to show the Film at TIFF, Rebel attempted  
12 to force the issue and bully them into capitulating to her other unreasonable demands by leveraging  
13 her popularity on social media to spread these malicious and baseless lies about Plaintiffs to her 11  
14 million Instagram followers. This was a vindictive attempt to destroy Plaintiffs' reputations with  
15 what she knew were demonstrably false statements.

16 10. This is par for the course for Rebel. Her autobiography was published in the United  
17 Kingdom and Australia with sections redacted due to Rebel's false allegations regarding a male  
18 actor's "inappropriate behavior" towards her. However, Rebel successfully used the furor around  
19 such allegations to promote the sale of her book. As with this situation, Rebel hypocritically  
20 played the victim in order to elicit public sympathy in the hope that it would advance her  
21 professional self-interest.

22 11. Rebel has run this playbook one time too many. Her conduct has caused severe  
23 financial, professional, and reputational harm to the Plaintiffs, and jeopardized the success of the  
24 Film, as Rebel's statements carry the clear and unmistakable defamatory meaning: that Plaintiffs  
25 criminally embezzled funds from the Film, committed serious misconduct by acting inappropriately  
26 towards the female lead of the Film, and regularly bullied and intimidated people in the film and  
27 music industries then concealed their bad behavior by forcing their victims to sign non-disclosure  
28 agreements. Additionally, taken with her prior spurious allegations against Ms. Ghost, Rebel's

1 recent statement also carries the unmistakable defamatory implication that Ms. Ghost committed  
2 sexual harassment against the lead actress of the Film, and that Ms. Ghost has a “history of doing  
3 this kind of thing.” Each and every one of these insinuations is patently false and easily disproven,  
4 for instance, by the examination of the Film’s financial records and the sworn testimony of the  
5 Film’s female lead.

6 12. Plaintiffs’ harms must be remedied promptly, and Rebel must be held accountable  
7 for her outrageous conduct.

### 8 **PARTIES**

9 13. Plaintiff Amanda Ghost (previously defined herein as “Ms. Ghost”) is an individual  
10 residing in the United Kingdom, and a Producer of the Film.

11 14. Plaintiff Gregor Cameron (previously defined herein as “Mr. Cameron”) is an  
12 individual residing in the United Kingdom, and a Producer of the Film.

13 15. Plaintiff Vince Holden (previously defined herein as “Mr. Holden”) is an individual  
14 residing in the United Kingdom and the Executive  
15 Producer of the Film.

16 16. Defendant Rebel Wilson (previously defined herein as “Rebel” or “Defendant”) is  
17 an individual residing in Los Angeles, California, and is an Actor, Director, and Producer of the  
18 Film.

19 17. Plaintiffs are ignorant of the true names and capacities of the Defendants sued herein  
20 as Does 1-50, inclusive, and therefore sues these Does by such fictitious names. Plaintiffs will  
21 amend this Complaint to allege the Does true names and capacities when ascertained. Each of the  
22 Does is in some manner responsible for some or all of the acts and/or omissions alleged herein.  
23 Plaintiffs are informed and believe and thereon allege that one or more of the Does were involved  
24 in the making and/or dissemination of the defamatory statements complained of herein. Wilson  
25 and Does 1-50 are collectively referred to herein as “Defendants.”

### 26 **JURISDICTION AND VENUE**

27 18. Jurisdiction exists and venue is proper in the State of California, County of Los  
28 Angeles pursuant to Code of Civil Procedure §§ 395 and 395.2 because Rebel is a resident or based

1 in the County of Los Angeles, and because the actions complained of herein occurred, in whole or  
2 in part, in the County of Los Angeles.

3 19. This Court has personal jurisdiction over Rebel because she is a resident of the State  
4 of California.

### 5 GENERAL ALLEGATIONS

#### 6 The Parties Agree to Produce “The Deb”

7 20. In or around February 2023, Plaintiffs were brought on to co-produce a feature film  
8 called “The Deb” (also referred to herein as the “Film”) with Rebel. The Film had a budgeted  
9 initial funding of 15 million Australian Dollars. Rebel did not contribute any financing towards the  
10 production of the Film.

11 21. The Deb was to be directed by Rebel, and produced by Ms. Ghost, Mr. Cameron,  
12 and Rebel, as well as a local producer that would be mutually agreed to by the parties.  
13 Additionally, Rebel contracted to act in the Film. Although Rebel was contracted to provide  
14 additional writing for the Film, she was never promised writing credit for the Film.

15 22. Importantly, writing credit for the movie belonged to Hannah Reilly. “The Deb” is  
16 based on a script by Reilly (the “Screenplay”), which was adapted from a stage play of the same  
17 name written by Reilly and Megan Washington (the “Underlying Stage Play”). Reilly was the  
18 recipient of a scholarship award developed and granted by Rebel, and as part of that program,  
19 Reilly developed the script for the Film. Reilly is a young and upcoming writer, and “The Deb”  
20 was her writing debut.

#### 21 Rebel Contests the Writer’s Credit

22 23. In October 2023, Rebel began to dispute Reilly’s writer’s credit and improperly  
23 claimed that she was entitled to it. On November 13, 2023, Reilly and Rebel submitted the issue  
24 for adjudication before the Australian Writers’ Guild (“AWG”). Neither Plaintiffs nor the  
25 production companies involved in the Film were part of the adjudication process before the AWG.  
26 Reilly and Rebel agreed to be bound by the decision of the AWG.

27 24. On March 4, 2024, the AWG rendered a credit determination for the Film, finding  
28 that the on-screen credits for the Film will be:

1 *Screenplay by Hannah Reilly*

2 *Additional Writing by Rebel Wilson*

3 *Based on a stage-play by Hannah Reilly*

4 *With music by Megan Washington, and lyrics by Hannah Reilly and Megan Washington*

5 25. Rebel immediately rejected the decision of the AWG, arguing without basis that the  
6 ruling was flawed. She obstinately demanded that Plaintiffs ignore the AWG’s ruling and give her  
7 a writing credit based on a “prior contractual agreement,” even though there is no such agreement  
8 of which to speak. Rebel took this position in complete disregard of Reilly’s rights to the credit,  
9 even though Reilly is her protégé.

10 **Rebel Contests the Film’s Licensing**

11 26. Rebel’s unreasonable demands were never-ending. She demanded that the Plaintiffs  
12 give her a record label with an external music group, even though Plaintiffs had no control over the  
13 external music group or its actions. She also fought with other writers about the publishing rights  
14 to songs in the Film, and demanded that Plaintiffs resolve such disputes to her advantage.

15 27. At every stage of the development of the Film, Rebel made unreasonable  
16 demands—many of which were outside the power of Plaintiffs to grant—and threatened the  
17 success of the Film unless her demands were met.

18 **Rebel Defames Ms. Ghost and Mr. Cameron**

19 28. Rebel escalated her tantrums beyond mere contract and arbitration disputes. In late  
20 2023, around the time Rebel began challenging the writer’s credit, she created out of whole cloth a  
21 false and malicious tale regarding an innocent interaction between Ms. Ghost and a lead actress on  
22 set. According to Rebel, Ms. Ghost forced the actress to stay at her penthouse apartment, and  
23 engaged in inappropriate behavior that made the actress feel uncomfortable. In truth, the penthouse  
24 apartment was rented for the purpose of housing members of the cast and crew for the Film and  
25 contained private quarters for each resident. Additionally, the actress in question soundly denied  
26 any claims of inappropriate behavior by Ms. Ghost or ever being made to feel uncomfortable.

27 29. Rebel conceded the falsity of the narrative she had concocted, admitting that she  
28 was not aware of any specific allegations of wrongdoing against Ms. Ghost. Yet, Rebel persisted

1 with bandying about her false and disproven story, repeating that Ms. Ghost is a sexual harasser to  
2 several individuals, including her partner, Ramona Agruma, and other professionals and individuals  
3 in the industry, several of whom discussed the allegations with Ms. Ghost and others known to Ms.  
4 Ghost.

5 30. Rebel’s outrageous lies did not stop there. Determined to destroy Plaintiffs’  
6 reputations, she also falsely accused Plaintiffs of embezzling funds from the Film’s budget without  
7 even an iota of evidence to support such claims. As Rebel is well-aware, the Film’s budget was  
8 regularly audited and she was kept regularly apprised of it, and including by signing a closing  
9 agreement detailing the financing of the Film. However, she was undeterred by facts.

10 31. These defamatory statements regarding Plaintiffs were made by Rebel to  
11 professionals and individuals in the industry, several of whom discussed the allegations with  
12 Plaintiffs and others known to Plaintiffs.

### 13 **Toronto International Film Festival**

14 32. By the summer of 2024, approximately \$22 million had been invested in the Film,  
15 all work was nearly complete, and it was on track to be a resounding success notwithstanding  
16 Rebel’s efforts at sabotage. The Film was selected to premiere at the prestigious closing spot of the  
17 Toronto International Film Festival, but Plaintiffs and the Film’s financiers had to consider  
18 carefully whether to invest in the marketing of the Film while it was embroiled in numerous credit  
19 and licensing disputes instigated by Rebel. Plaintiffs attempted to resolve the disputes in good  
20 faith, but Rebel had other ideas.

### 21 **Rebel Repeats and Republishes the Defamatory Statements**

22 33. On July 10, 2024, as Plaintiffs were scrambling to ensure the Film’s premiere at  
23 TIFF, Rebel doubled down on her malicious lies, posting a video on her Instagram page to her 11  
24 million followers, stating as follows:

25 “So you might have noticed that I did a post a couple, you know,  
26 like a week ago, about my film, the first film that I’ve directed that  
27 I’m so proud of The Deb, which is a little Australian original musical  
28 that is so cute, and it’s awesome that it got selected for closing night  
of the Toronto Film Festival, which is like ... just you know, the



1 best platform, and to be a first-time female director it's just like, I  
2 mean, it's huge. It's massive.

3 So to have the joy of the movie being selected is one thing. But then  
4 to have the business partners that are involved in that movie turn  
5 around and say that no, the movie can't premiere, is just beyond  
6 devastating.

7 Why are they saying this? Why are they stopping it from premiering  
8 at Toronto? Well, this dates back to October of last year, *where I*  
9 *discovered bad behavior by these business partners. And let me*  
10 *just, you know, I just tell it how it is, so I'm just going to tell you*  
11 *who they are. They are so called producers of the film — I use that*  
12 *phrase very lightly. Their names are Amanda Ghost, and Gregory*  
13 *[sic] Cameron, and an executive producer who works with them*  
14 *called Vince Holden.* So these are the people involved.

15 And so I said, reported, I guess you would say, *their bad behavior*  
16 *when I found out not minor things, big things, you know,*  
17 *inappropriate behavior towards the lead actress of the film,*  
18 *embezzling funds from the film's budget,* which we really needed  
19 because we're a small movie, you know? So kind of really important  
20 things.

21 Since I reported that behavior, I have been met with absolute  
22 viciousness and retaliatory behavior. So I'm there on set. I'm trying  
23 to film my movie with my gorgeous Australian cast and crew who  
24 are so amazing — shout out to all of you guys.

25 And yet every step of the way, these people who I complained about  
26 then tried to make my life hell. In the meantime, though, I still  
27 finished the movie. I made this great movie *The Deb*. And then now,  
28 you know, almost at the finish line. They're saying, you know, it  
can't come out. They might not release it, they might bury it. This  
is work of hundreds of people who have put their heart and soul into  
this. And this behavior is absolutely vile and disgusting. *Now these*  
*people you know, Amanda Ghost in particular, has has a history*  
*of doing this kind of thing, mainly to music artists but also to*  
*people in the film business. So, the thing is, these people are forced*  
*to sign NDAs or, you know, otherwise threatened or bullied to not*  
*speak out.*

As you guys know, I'm not like that. I won't be threatened. I will  
speak the truth, and, you know, warn people about these people in  
the industry. Who are just not behaving ethically. Yeah, so that's  
my dilemma. If the movie doesn't play at Toronto, it's because of  
these absolute f\*ckwits.”

1           34. Rebel’s statement broadcast to her millions of followers has a clear and  
2 unmistakable defamatory meaning: that Plaintiffs criminally embezzled funds from the Film,  
3 committed serious misconduct by acting inappropriately towards the female lead of The Film, and  
4 regularly bullied and intimidated people in the film and music industries then concealed their bad  
5 behavior by forcing their victims to sign non-disclosure agreements, all of which are patently false.

6           35. Taken with her prior spurious allegations against Ms. Ghost, Rebel’s recent  
7 statement also carries the unmistakable defamatory implication that Ms. Ghost committed sexual  
8 harassment against the lead actress of the Film, and that Ms. Ghost has a “history of doing this kind  
9 of thing,” all of which are patently false.

10           **Rebel’s Defamatory Statements are Republished**

11           36. Rebel’s blatant lies spread far and wide and were reprinted and republished in  
12 several publications, including without limitation, the following:

13           a. Deadline, *Rebel Wilson Wallops Backers of her Directing Debut ‘The Deb’*  
14 *for Nixing Pic from Toronto Berth; Producers Call Claims “False, Defamatory And*  
15 *Disappointing” – Update, July 7, 2024*

16           b. Indiewire, *Rebel Wilson Claims Producers on Directorial Debut have*  
17 *Blocked TIFF Premiere: It’s ‘Vile’ Behavior, July 7, 2024*

18           c. Entertainment Weekly, *Rebel Wilson Accuses The Deb*  
19 *Producers of Blocking Film Festival Debut, Asks People to Help ‘Save’ her Feature, July 7, 2024*

20           d. The Daily Beast, *Rebel Wilson Slams ‘So-Called Producers’ for ‘Burying’*  
21 *Her Film, July 7, 2024*

22           e. Metro, *Rebel Wilson Vows to ‘Speak the Truth’ After Accusing Producers of*  
23 *‘Burying’ her New Film, July 7, 2024.*

24           37. The emotional and reputational harm to Plaintiffs is irreparable, and Rebel must be  
25 held accountable for her egregious conduct.

26 ///

27 ///

28 ///

1 **FIRST CAUSE OF ACTION**

2 **(Defamation and Defamation Per Se Against All Defendants)**

3 38. Plaintiffs repeat and hereby incorporate by reference the preceding paragraphs as  
4 though set forth in full.

5 39. In or about late 2023 and 2024, Rebel published false statements regarding Plaintiffs  
6 to professionals in the film industry, and to her 11 million Instagram followers. Rebel's statements  
7 expressed or implied that:

- 8 a. Plaintiffs sexually harassed a lead actress involved in the Film;  
9 b. Plaintiffs embezzled funds from the Film's financing for personal gain; and  
10 c. Plaintiffs acted with inappropriate behavior towards the lead actress of the  
11 Film.

12 40. These false statements are of and concerning Plaintiffs in that they wrongfully  
13 communicate that the Plaintiffs engaged in criminal conduct.

14 41. Each of the statements set forth above carries the unmistakable defamatory meaning,  
15 both explicit and implicit, that Plaintiffs are criminals, thieves, and sexual harassers. These  
16 statements have a natural tendency to harm Plaintiffs' reputation, subject them to hatred, ridicule,  
17 or obloquy, and cause actual harm to their reputation and professional career.

18 42. Rebel's statements were false and have injured Plaintiffs and caused them severe  
19 distress.

20 43. Rebel knew when she made the statements set forth above that they were false,  
21 and/or acted with reckless disregard of the truth, including because she was informed by the lead  
22 actress that Ms. Ghost did not do anything inappropriate or wrongful, and because she was kept  
23 fully apprised of the Film's budget. At the time the statements were made, Rebel had no plausible  
24 basis and no evidence to support her claims. She simply made them up with actual malice.

25 44. Rebel's statements were unprivileged.

26 45. Rebel's statements are defamatory per se.

27 46. Plaintiffs have suffered damages in an amount in excess of the jurisdictional  
28 minimum of this Court as a direct result of Rebel's false statements, including without limitation

1 damage to their reputation; damage to their personal brand; and goodwill in the community as  
2 businesspeople; emotional suffering and distress; potential income and goodwill associated with  
3 lost opportunities as a result of the negative publicity associated with Rebel’s allegations, and  
4 associated long-term loss of goodwill and marketability.

5 47. In taking the actions alleged in this Complaint, Rebel acted willfully and  
6 wrongfully, with malice, oppression, and fraud, and in conscious disregard of Plaintiffs’ rights, for  
7 which conduct Plaintiffs are entitled to an award of punitive or exemplary damages.

8 **PRAYER**

9 WHEREFORE, Plaintiffs request judgment with each item of this prayer being for relief  
10 additional to and alternative to each other item and not an election of remedies, as follows:

- 11 1. Actual damages according to proof;
- 12 2. Costs, and expenses;
- 13 3. Prejudgment and post-judgment interest in the maximum amounts provided by law;
- 14 and
- 15 4. For such other and further relief as the Court deems just and proper.

16  
17 DATED: July 12, 2024

BROWN RUDNICK LLP

18  
19 By: Camille M. Vasquez  
20 CAMILLE M. VASQUEZ  
21 Attorneys for Plaintiffs  
22 AMANDA GHOST, GREGOR CAMERON, and  
23 VINCE HOLDEN  
24  
25  
26  
27  
28