

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NADIA TARAZI, individually and  
derivatively as a member of PAINTED  
WINGS MEDIA, LLC,  
Plaintiff,

v.

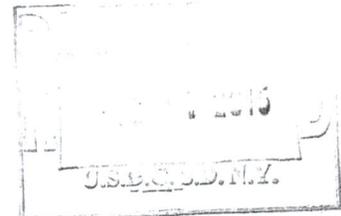
QUINTESSENTIAL BIOSCIENCES, LLC  
d/b/a Q SCIENCES,  
Defendant,

No. \_\_\_\_\_

**15 CV 1038**

**COMPLAINT**

**JURY TRIAL DEMANDED**



Plaintiff Nadia Tarazi (“Tarazi”), individually and derivatively on behalf of Painted Wings Media, LLC (“Painted Wings”), by her attorneys, Bailey Duquette P.C., for her Complaint against defendant, Quintessential Biosciences, LLC (“Q Sciences”), alleges as follows:

**INTRODUCTION**

1. Plaintiff Tarazi formed the limited liability company Painted Wings with Autumn Stringam in April 2012. Tarazi and Autumn are both 50% owners of Painted Wings. The primary purpose of Painted Wings is to tell Autumn Stringam’s life story – as set forth in her book, *A Promise of Hope* – across a variety of media. In connection therewith, Autumn provided the exclusive rights to use and tell her life story to Painted Wings, and agreed to act as a Manager (in the role of Content Director) for the company on an ongoing basis. Autumn is in breach of her fiduciary duties to Painted Wings, and is being aided and abetted in doing so by defendant Q Sciences. Q Sciences also tortiously interfered with Painted Wings’ contract with Autumn

Stringam.<sup>1</sup>

### **THE PARTIES**

2. Nadia Tarazi is an individual and a citizen of the State of New York. Tarazi is the President of, and holds a 50% membership interest in, Painted Wings. At the time of the acts described in this Complaint she was a resident of New York County.

3. Nominal defendant Painted Wings is a New York limited liability company with its principal place of business located at 4223 Oak Beach Road, Oak Beach, New York, 11702.

4. Upon information and belief, defendant Quintessential Biosciences, LLC d/b/a Q Sciences is a limited liability company organized under the laws of the State of Utah. Upon information and belief, Q Sciences's sole member, Marc Wilson, is a citizen of the state of Utah. Q Sciences is a multi-level marketing company that promotes its products to, and regularly transacts business in, the State of New York.

### **JURISDICTION AND VENUE**

5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1), in that the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs, and is between citizens of different States.

6. This Court has personal jurisdiction over Q Sciences pursuant to N.Y. CPLR §§ 301 and 302.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) or, alternatively, 28 U.S.C. § 1391(b)(3).

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<sup>1</sup> Tarazi and her company, Micronutrient Solutions, Inc., have previously brought claims against Q Sciences in the related case Tarazi v. Truehope, Inc. et al, No. 13-cv-1024 (S.D.N.Y.), for aiding and abetting the breach of fiduciary duty by Autumn and her husband, Dana Stringam, to a joint venture the Stringams had entered into with Tarazi to sell micronutrient products and to use Autumn's story (in conjunction with Painted Wings) to promote such products.