

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

DR. SPRING CHENOA COOPER,

Plaintiff,

-against-

RYAN BROEMS, CALIDADDY26, INRISKWETRUST,  
and JOHN DOES 1-100,

Defendant(s).

**Affidavit in Support of  
Plaintiff’s Motion for  
Summary Judgment**

Index No. 153384/2018

STATE OF NEW YORK            }  
                                                          } SS:  
COUNTY OF NEW YORK        }

DR. SPRING CHENOA COOPER, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-stylized action and am fully and personally familiar with the facts and circumstances of this matter.

2. I submit this Affidavit in Support of a Motion for Summary Judgment as to defendant Ryan Broems’ liability for disseminating my intimate images without my permission or consent.

**Defendant Has Admitted to Disseminating my Intimate Images  
without my Permission or Consent**

3. I have read the Complaint filed in this action and know the contents thereof. At the time the Complaint was filed, I knew the information contained therein to be true, except those matters alleged upon information and belief, and that as to those I believed them to be true.

4. When we first filed the Complaint, however, I was unsure whether the online accounts that had harassed me and had disseminated my intimate images were defendant Ryan Broems (“Defendant” or “Broems”) himself or someone acting on his behalf.

5. In the five years that have passed since the filing of that Complaint, however, much information has come to light that confirms that Broems is the individual responsible for the nightmare I have been forced to endure since our breakup.

6. “CaliDaddy26” was the first account that contacted me immediately prior to my intimate content going online (Exhibit 1, ¶30). “CaliDaddy26[.]” in sum and substance, demanded that I send him intimate images otherwise he would post me on his “slut exposing blog” (Exhibit 1, ¶30).

7. Immediately thereafter, “CaliDaddy26” uploaded three images onto Tumblr (Exhibit 1, ¶31). The first two depicted my face and nude body as I masturbated and the final showed my OKCupid profile.

8. Tumblr produced information which demonstrated that the account entitled “CaliDaddy26” was previously entitled “NYCRyan86” (Exhibit 5).

9. Importantly, Broems admitted that he created and utilized the Tumblr account “NYCRyan86” (Exhibit 6).

10. Accordingly, Defendant Broems is “CaliDaddy26” and, as such, he is the one who demanded that I be his “personal webslut” and subsequently uploaded my intimate content online.

11. Everything in my life changed after Broems first contacted me as “CaliDaddy26[.]” Intimate image after image was relentlessly uploaded online for weeks, often

alongside my name, social media profiles, contact information, and other identifying information about me.

12. Using the information Defendant provided, strangers found and contacted me online. I will never again know a life where my intimate materials are not at risk of being disseminated by a third party who saved the content initially uploaded by Broems.

13. If the production from Tumblr and Broems' confirmation of his ownership of the account was not enough, Broems also pleaded guilty to his violation of New York City's revenge porn law (Exhibit 3). Defendant was allocuted when he pleaded guilty and admitted to all of the required elements of the law.

14. I was never allowed a day in court and was never able to confront him for what he had done to me. Defendant paid no fines and served no jail time for what he did. Instead, he consented to an order of protection and had to attend an abusive partner program virtually (Exhibit 3).

15. While Defendant, perhaps, has been allowed to move on with his life I, however, continue to be stuck in a never-ending cycle of fear due to his uploading of my intimate images along with my name, employer, title, social media pages, and contact information.

#### **Defendant's Actions Cause Me to Live in Fear**

16. In the first few days and weeks after this happened, it was commonplace for me to look at my phone on my way to see friends or go to work and learn, in one way or another, that yet another batch of intimate images and/or videos of me had been uploaded online.

17. Because Defendant posted so much identifying information about me online, he made it very easy for people to know my name, know where I worked, know what I did for a living, and to contact me using that provided information.

18. Typically, I would be alerted to new content being uploaded when I would receive a barrage of sexualized messages on my social media or e-mail. Though generally their messages were grotesque, demanding, and demeaning, interacting with them was my only option of learning where online the content was posted. One by one I would engage these individuals to learn more, blocking those who remained lecherous and thanking those who provided me with the links I needed to pursue removal.

19. In those moments, my life would stop. No matter where I was, who I was with, or what my plans were for the day, my focus needed to immediately be finding the content and advocating for its removal because, as I came to learn, the longer the content is allowed to remain online, the more it will propagate.

20. I distinctly remember being on a subway car when I saw yet another round of images had been shared and feeling completely overwhelmed and helpless to the point where I broke down and sobbed uncontrollably surrounded by strangers.

21. Other times I found myself alone at home crying for hours at a time, unable to stop.

22. This experience has caused me to have a love/hate relationship with my phone and social media as it was both the cause of my misery and the saving grace that allowed me to quickly be made aware of and intervene when new content went online.

23. It's disgusting that I felt some version of grateful when I was able to extract useful information from people who were only contacting me to degrade and sexualize me.

24. From the day Defendant first threatened to disseminate and later did actually disseminate my intimate images, I have been terrified of searching my own name online. I

continue to carry this fear to this day and rely on the vigilance of my attorney to monitor for images making their way online once again.

25. Additionally, after months of living in fear of the sound of my phone alerting me that strangers had found a new batch of images and were contacting me about them, I now keep my alerts on silent as the distinct dings remain triggering.

26. Defendant's campaign of retaliation was as relentless as it was dehumanizing, and it had devastating effects on my life which continue to this day.

**Defendant's Actions Harmed my Relationships, Emotional State, and Work**

27. When new content was uploaded, which, for a time, was not infrequent, it was all hands on deck to figure out how to contact web servers, determine whether the website had a specific removal process, and do whatever could be done to get the content down, and fast. Oftentimes the websites would delay in responding; some would not respond at all.

28. Sometimes this process would take twenty minutes and sometimes it would take over a week – even with me, and sometimes friends, contacting the website several times per day.

29. Though I invited friends over to help search and advocate for removal of the intimate content, there was little they or anyone else could do to bring me any semblance of safety or comfort.

30. Indeed, as Broems continued to get arrested time and time again and photos and videos continued to be uploaded online as retaliation, I realized there was no way for me to protect myself from all the havoc he could induce remotely.

31. This realization was incredibly defeating, and, for a period, it broke me.

32. While being attached to my phone doubtlessly helped contain some of the damage that Defendant was actively causing me, it also caused immense harm to my work, my relationships, and my emotional wellbeing.

33. At work there was a period where I went from writing several journal articles per year to barely holding on. While I know my employer was and is aware of the intense emotional trauma I experienced due to Broems' actions, I feared, for a time, it would affect their decision to offer me tenure.

34. Attempts to discuss my experiences with superiors only made me realize how uncomfortable the allegations themselves make people. Even though I know I am not the one to blame, the fact that others may think differently is undeniable.

35. While I was certainly slut-shamed by strangers online, even well-meaning people made comments which were both ignorant and hurtful.

36. At times I isolated myself from others, as the amount of work that went into being social seemed insurmountable. Friends grew tired of my distractedness and abandonment of our scheduled meetings. My relationships suffered as I struggled to accept and navigate my new reality.

37. Spending nearly an entire year involved and invested in a romantic relationship with someone capable of doing this to a human being they supposedly cared about caused me to second guess my judgment in choosing partners.

38. While I previously believed people to be deserving of trust and be given every benefit of the doubt, this experience ravaged that optimism. Broems' betrayal has made me wary of every prospective partner I encounter – even the good ones.

39. I am plagued by intrusive thoughts that all people are inherently bad. Thinking about Broems and the endless deluge of vile and condescending messages I received following his dissemination of my content only supports that theory.

### **Broems Exposed Me**

40. While it may seem like a trite sentiment, Broems' actions were deeply exposing.

41. When he disseminated my intimate content online, I felt not just betrayed but also like I had lost all control over my body, my images, and my life. Because of what Broems did, for a time those things did not feel like they belonged just to me anymore but were instead something that strangers on the internet owned as well.

42. This sense of privacy was perhaps something that I did not fully comprehend I had until I lost it. Now it's gone forever.

43. This feeling that you are all alone in life and yet your images are everywhere is deeply isolating.

44. I cannot begin to tally the number of people who contacted me to tell me they had seen my naked body and share whatever unsolicited comment about it or their perception of me that popped into their head.

45. Knowing that those are just the people that took the additional step to contact me leads me to believe that the number of people who simply saw the content and took no further action is staggering.

46. Making multiple police reports about what had happened was retraumatizing. Each time Defendant uploaded new content, the police would come to my home and I would be forced to discuss this and share my intimate pictures with complete strangers. Often the police officers did not know that doing this was a crime. Generally speaking, the responding officers

did not seem properly trained or emotionally equipped to deal with the sensitive nature of the offense and often their visits left me feeling re-exposed and doubtful of the criminal justice system's ability to help me.

47. In particular, I remember several officers were confused as to how to collect the electronic evidence and so took pictures of the intimate content I had shown them on my devices using their cellphones. The experience was both exhausting and panic-inducing as it felt like I needed to further expose myself to obtain the protection of the police.

48. Worse yet, Broems seemed wholly undeterred by his multiple arrests, leaving me dejected, hopeless, and doubtful that I would ever find peace from his relentless harassment.

#### **Broems Retaliates When Confronted with his Bad Acts**

49. The fact that Broems decided to further retaliate against me by claiming that I nonconsensually recorded and disseminated an intimate video of *him* is absurd, and clearly only being done because he believes it gives him leverage against me in this lawsuit.

50. I never disseminated Broems' intimate content without his permission or consent and any content that was recorded and/or shared was done with his approval and in a manner that ensured he was in no way identifiable.

51. The video described by Defendant was recorded and shared during the course of our relationship and was done only after discussion between the two of us. It was not recorded or shared in a malicious manner and we remained intimate thereafter.

52. The utter fallacy of Broems claim is confirmed by Broems' indication that I physically overpowered him – a young, large, strong man who had recently served in the United States Air Force – sodomized him against his will, and then posted the video online to hurt him. This story is as implausible as it is offensive.



53. The fact that Defendant only started making such claims after he had posted my intimate content online and after I had filed a police report for it says it all.

54. It's deeply upsetting that Broems, after sharing my intimate content online for weeks, getting arrested, and later pleading guilty to doing it, can simply fabricate a story that I am more depraved than he is and it gets to live online forever.

55. Given Broems was arrested for, charged with, and pleaded guilty to disseminating my intimate content based on numerous police reports I filed, I can only imagine if he had any document which tended to support his claims, he would have shown the police and I would have been arrested. At the very least, he would have produced such documentation in discovery, something he has also not done.

56. Instead, I assume the police were shown exactly what Defendant disclosed during discovery in this matter: absolutely nothing supporting this ridiculous contention.

57. Similarly, Broems' claim that I filed several false police reports against him has not aged well, considering he's admitted to owning at least one profile that uploaded my content and pleaded guilty to committing the offense for which he was arrested.

58. The remainder of Defendant's claims about suffering from emotional distress, including his issues with where he was served, Plaintiff's statements to the press about her Complaint, and Plaintiff's allegedly fabricated allegations contained in a family offense proceeding are additionally conclusory, speculative, and/or patently untrue.

59. I ask that this court sees Broems' maneuver for what it is: just another way for him to subject me to public humiliation and victimize me with the hope it will give him litigational advantage.

### My Pursuit of Advocacy

60. Immediately after these acts began to unfold, I started searching for a community of people who had experienced what I had or something like it.

61. I was desperate to find a support group but found none.

62. Instead, I found and joined a New York City-based group of lawyers, academics, and survivors devoted to educating the public about the effects of nonconsensual pornography and advocating for its victims.

63. To date, in addition to therapy, this has been one of the most helpful aspects of my journey toward healing.

64. I also explored the healing process in my professional role as a social researcher. More specifically, I undertook a research project which examined how people recovered from cyber sexual assault.

65. Over and over again I heard some variation of my story – that the burden was placed on them to undo what the bad actor had done, that there was no instruction manual on best practices for getting an intimate image removed from the various websites that host them, that they were the ones educating the police, and that the police were insensitive to their situation.

66. Most interestingly for the purposes of my research project, one of the biggest steps in recovery was the so-called “f--- it” point, the point where people realize they cannot hide from what the other person did to them, they cannot minimize it, and there is nothing out there to support them through it so the only thing left is to become an advocate for themselves.

67. I, too, have experienced the healing powers of becoming my own advocate.

68. I speak about my experience on panels, I remain involved with the Cyber Sexual Abuse Task Force, and I generally try my best to help and support others who are going through some version of what I went through.

69. Following my research on this topic, I, with the help of others, created a website which provides support materials for those affected, a guide to removing intimate images from various websites, and other resources for survivals of this horrible act.

70. While I will never be able to undo what Defendant did to me, perhaps I can lessen the burden that others must carry.

71. I respectfully request that this court grant the relief requested.

72. Defendant has admitted to his role in disseminating the first round of my intimate images and, make no mistake, he is responsible for disseminating the others as well - Defendant was the only one who possessed or had access to them. Despite not having my consent to upload this content he did so out of some twisted desire to harm me in retaliation for our break up.

73. While the relief sought in this motion will not make me whole again, it will help defray the costs I incurred as a result of Defendant's reign of terror and hopefully discourage Defendant from doing this or something like this to someone else in the future.

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**Dr. Spring Cooper**

Sworn to me this 31st day  
of May 2023

Daniel S. Szalkiewicz  
Notary Public, State of New York  
No. 02SZ0000312  
Qualified in New York County  
Commission Expires 02/02/2027

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Notary Public

This electronic notarial act involved a remote online appearance involving the use of communication technology.