

LAVELY & SINGER

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

LOS ANGELES, CALIFORNIA 90067-2906

△ ALSO ADMITTED IN NY
* ALSO ADMITTED IN TX

January 13, 2026
(Updated)

VIA EMAIL:

Ms. Julie Theis (d/b/a - Tik Tok @JulieTheis; d/b/a – Instagram @julietheisofficial)

Re: Justin Bieber and Hailey Bieber / Julie Theis

Our File No.:6899-5

Ms. Theis:

This firm is litigation counsel for Hailey Bieber and Justin Bieber. We write concerning the outrageous false, fabricated, and defamatory statements you made and disseminated online, including, but not limited to, posted (i) in TikTok videos from the account @julietheis, at the url www.tiktok.com/@julietheis/video/7589514518338866462, on January 8, 2026, and (ii) reposted from the account @bdr33, at the url www.tiktok.com/@bdr3391/video/7592908036818226446, on January 8, 2026, and (iii) in your Instagram video from the account @julietheisofficial, at the url www.instagram.com/julietheisofficial/reel/DTBJjtmDx7V, on January 2 (collectively, the “Videos”).

You have manufactured a false defamatory narrative concerning our clients and their marriage that were published and widely disseminated in the Videos on your social media channels and platforms. Your conduct is wrongful, highly damaging, actionable, and exposes you to substantial liability. ***We demand that you immediately cease and desist from this wrongful and tortious conduct, and remove the Videos.***

In the Videos, you assert that long-term romantic relationships “only work” because women tolerate “abuse,” among other alleged conduct, and you expressly identify Hailey Bieber and Justin Bieber as “the best example” of this purported dynamic of abuse. In furtherance of that ridiculous claim, you fabricate, and falsely characterize Mr. Bieber as an “addict,” stating that “an addictive partner is always an abusive partner.” Although you attempt to present these remarks as generalized commentary, they are neither abstract nor hypothetical. By defining “tolerance” to include abuse and then holding our clients out as the exemplar of that supposed reality, you, as false fact, unmistakably assert that Ms. Bieber is in an abusive relationship and that Mr. Bieber engages in abusive behavior against his spouse. That accusation is not only false, it constitutes defamation, and exposes you to substantial liability.

Allegations or insinuations of domestic abuse are among the most serious accusations that can be leveled against an individual. Your statements are unsupported by facts, evidence, or verified information. Instead, they consist of reckless fabrications presented as truth and applied to real, identifiable people.

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You cannot avoid responsibility by framing your claims as commentary or personal belief. A statement that states or implies the existence of undisclosed facts—particularly one accusing a person of criminal conduct such as spousal abuse—is actionable regardless of whether it is couched in opinion-like language. As the Supreme Court has made clear, “[i]f a speaker says, ‘In my opinion John Jones is a liar,’ he implies a knowledge of facts which lead to the conclusion that Jones told an untruth,” and “[s]imply couching such statements in terms of opinion does not dispel these implications.” *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 17–18 (1990).

Nor does the absence of an explicit accusation insulate you from liability. Defamation arises not only from what is stated directly, but from what is insinuated, implied, and conveyed by context. Indeed, your false and defamatory assertions, even if arguably made by implication, are still actionable as defamation. *See Solano v. Playgirl, Inc.*, 292 F.3d 1078, 1083 (9th Cir. 2002), quoting *Selleck v. Globe Int'l*, 166 Cal.App.3d 1123 (1985) (“our inquiry is not to determine whether the publication may have an innocent meaning but rather to determine if it reasonably conveys a defamatory meaning. In making that determination we look to what is explicitly stated as well as what insinuation and implication can reasonably be drawn from the publication.”); *White v. Fraternal Order of Police*, 909 F.2d 512, 518 (D.C. Cir. 1990) (“defamation by implication stems not from what is literally stated, but what is implied.”); *Kapellas v. Kofman*, 1 Cal. 3d 20, 33 (1969) (publisher liable “for what is insinuated as well as for what is stated explicitly”); *Stevens v. Iowa Newspapers, Inc.*, 728 N.W.2d 823, 827 (Iowa 2007) (“Defamation by implication arises, not from what is stated, but from what is implied when a defendant (1) juxtaposes a series of facts so as to imply a defamatory connection between them, or (2) creates a defamatory implication by omitting facts, [such that] he may be held responsible for the defamatory implication”); *Armstrong v. Simon & Schuster, Inc.*, 85 N.Y.2d 272 (1995) (“Defamation by implication is premised not on direct statements but on false suggestions, impressions and implications arising from otherwise truthful

conveys a defamatory meaning. In making that determination we look to what is explicitly stated as well as what insinuation and implication can reasonably be drawn from the publication.”); *White v. Fraternal Order of Police*, 909 F.2d 512, 518 (D.C. Cir. 1990) (“defamation by implication stems not from what is literally stated, but what is implied.”); *Kapellas v. Kofman*, 1 Cal. 3d 20, 33 (1969) (publisher liable “for what is insinuated as well as for what is stated explicitly”); *Stevens v. Iowa Newspapers, Inc.*, 728 N.W.2d 823, 827 (Iowa 2007) (“Defamation by implication arises, not from what is stated, but from what is implied when a defendant (1) juxtaposes a series of facts so as to imply a defamatory connection between them, or (2) creates a defamatory implication by omitting what may be held responsible for the defamatory implication”); *Armstrong v. Simon*, 5 N.Y.2d 373 (1995) (“‘Defamation by implication’ is premised not on direct false suggestions, impressions and implications arising from otherwise truthful statements.”). Here, the defamatory meaning of your statements is clear and unavoidable – you characterize Mr. Bieber as an “addict,” stating that “an addictive partner is always an abusive partner” thereby making an unequivocal statement that Mr. Bieber is a domestic abuser, and that Ms. Bieber is an abused spouse. Your statements and conduct are blatant, and outrageous.

Moreover, it is defamatory *per se* to falsely assert that an individual engaged in criminal misconduct such as abuse, and damages are presumed as a matter of law. See, e.g., *Condit v. Nat’l Enquirer, Inc.*, 248 F. Supp. 2d 945, 965 (E.D. Cal. 2002) (statements falsely imputing criminal conduct are libelous on their face); *Goehring v. Wright*, 858 F. Supp. 989, 1004 (N.D. Cal. 1994) (false charge of criminality is defamatory *per se*); *Sprewell v. NYP Holdings, Inc.*, 772 N.Y.S.2d 188, 190 (Sup. Ct. 2003); *Allard v. Church of Scientology*, 58 Cal. App. 3d 439 (1976). These principles apply even where a speaker attempts to mischaracterize defamatory assertions as “opinion.” Your false statements further subject you to liability for portraying our clients in a highly offensive false light, and you remain responsible for the foreseeable consequences of their continued dissemination. See, e.g., Smolla, *Law of Defamation* (2d ed.), Vol. 1, § 4:91.

The sensationalized fabrications you disseminated in the Videos place our clients in a highly offensive and false light by associating them with abuse, coercion, and substance-related misconduct. See, e.g., *M.G. v. Time Warner, Inc.*, 89 Cal. App. 4th 623, 636 (2001). Once published, such allegations predictably invite speculation, harassment, and reputational harm that is difficult, if not impossible, to fully undo. That harm has already occurred here.

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The harm caused by this type of content extends beyond professional reputation. It intrudes on personal privacy, inflicts emotional distress, and invites public judgment based on falsehoods. That harm is compounded by the platform you chose and the scope of dissemination. Your reckless, calculated and tortious conduct exposes you to Millions of Dollars of liability. This is a serious matter.

Accordingly, on behalf of our clients, we hereby demand that you immediately take the following actions, and confirm to us in writing, within 24-hours, of your compliance with thereof:

- 1. Remove the December 29, 2025 and January 8, 2026 TikTok Videos, and January 2 Instagram Video, referencing Hailey Bieber and Justin Bieber;**
- 2. Permanently cease and desist from further publishing, disseminating, or repeating any statements or content that claim or imply that Ms. Bieber is in an abusive relationship or that either of our clients engages in abusive behavior; and**
- 3. Permanently refrain from reposting, restating, or amplifying the same or similar allegations on TikTok, Instagram, or any other social media platform, website or media.**

Should you continue to engage in wrongful conduct directed at our clients, including as described herein, and/or fail to comply with this letter’s demands, you will leave my clients with no choice but to protect their rights and remedies against you.

You act at your own peril.

Govern yourself accordingly.

This letter does not constitute a complete or exhaustive statement of all of my clients’ rights or claims. Nothing contained herein is intended as, nor should it be deemed to constitute, a waiver or relinquishment of any of our clients’ rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

Sincerely,

/s/

cc: Ms. Hailey Bieber
Mr. Justin Bieber