

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

R.M., A MINOR CHILD THROUGH HER
MOTHER, EMILY MORENO

31366 St. Andrews
Westlake, OH 44145

Plaintiff,

v.

MAX L. MILLER

435 Oakmoor Rd.
Bay Village, OH 44113,

AARON MINC

200 Park Ave, Suite 200
Orange Village, Ohio 44122,

and

MINC LLC

c/o Aaron Minc, Statutory Agent
200 Park Ave, Suite 200
Orange Village, Ohio 44122

Defendants.

Case No. _____

Judge _____

Magistrate Judge _____

PLAINTIFF R.M.'S COMPLAINT

NATURE OF THE ACTION

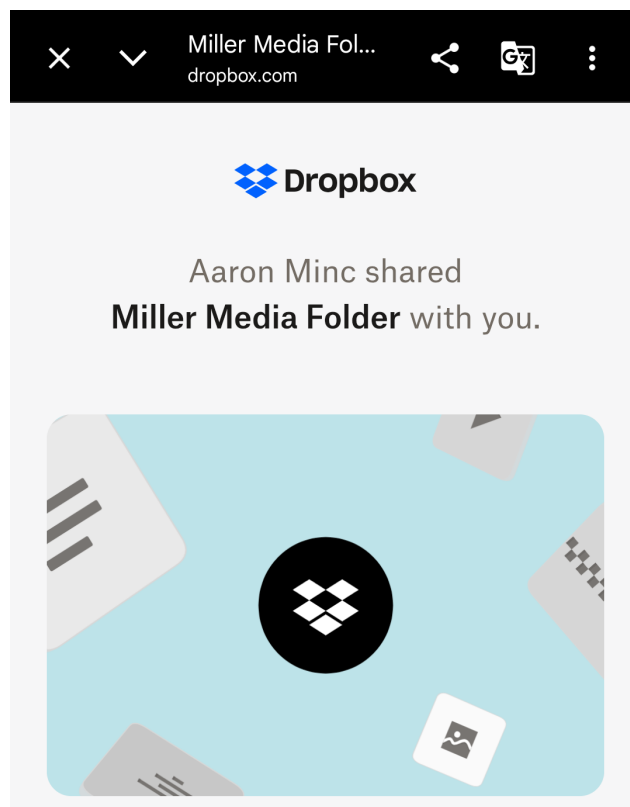
1. This is a civil-rights action brought on behalf of R.M., a two-and-a-half-year-old girl, by her mother, Emily Moreno.

2. On August 2, 2026, R.M.'s father, Defendant Congressman Max Miller, and Miller's lawyer, Defendant Aaron Minc of Defendant Minc LLC, recklessly published and disclosed to the world a nude image of the child depicting her genitalia. (A veteran pediatrician confirms that

the photo depicts this. Dr. B. Gascoigne expert letter, Aug. 11, 2026, Ex. 1.) Faced with a mostly self-inflicted dumpster fire of public attention to his reputation for abusive behavior, Miller so desperately wanted to salvage his political job, that he recklessly and intentionally provided Minc a trove of documents and photos, indifferent about what they contained or how they were used.

3. The photos included the nude image. Then Minc, under intense pressure from Miller that only heightened the recklessness, placed or kept that image in an electronic Dropbox folder a link to which he provided Miller, knowing Miller would disseminate it in conjunction with a planned Sunday, August 2, 2026 live video broadcast on the social-media platform X, formerly known as Twitter. After his broadcast diatribe against Ms. Moreno and accusations of abuse, Miller then blasted out the Minc Dropbox folder's link.

4. More than 400,000 people saw or interacted with the two posts containing the folder.





5. According to Minc, the image remained online for about 23 hours, for anyone to download. *See* A. Minc, email, (Aug. 3, 2026, 7:32 PM), attached as **Ex. 2**.
6. Minc acknowledged responsibility.
7. But despite repeated requests from Ms. Moreno's counsel, Defendants have refused to provide information about how many times Defendants disclosed and transferred the intimate image to viewers who accessed, viewed, or downloaded the intimate image. Nor will Defendants answer questions about who might have accessed, viewed, or downloaded the image.

8. Rather than answering questions about the extent of the damage and what the plan was the clean up the mess, Minc first started lying to the media about the seriousness of their offense, falsely insisting that there was no nude image in which genitals were visible. He and Miller diverted attention to a different, topless image of the girl. But they knew these were lies because Ms. Moreno's counsel had written to Minc with the actual document's title and told Minc the image is labeled IMG_9158—a different image.

9. Pressed further to answer the questions he was ignoring, Minc lawyered up.

10. Defendants' non-consensual disclosures violated 15 U.S.C. § 6851 (Civil action relating to disclosure of intimate images). They are liable under that statute for liquidated damages of \$150,000 per image disclosure and transfer.

11. They also face civil liability for criminal acts under Ohio Rev. Code § 2307.60, including the crimes of "Illegal use of minor or impaired person in nudity-oriented material or performance" (Ohio Rev. Code § 2907.323(A)(2)), attempt, and complicity.

12. And Defendants are liable for Ohio state-law torts of wrongful invasion of privacy, negligence, and civil conspiracy.

PARTIES

13. Plaintiff R.M. is a two-year-old child living under shared custody with her mother in Cuyahoga County. Her mother, through whom she is suing, is Emily Moreno.

14. Defendant Max Miller resides in Cuyahoga County, Ohio. He is a member of Congress running for re-election—his primary motive for his reckless, senseless, selfish disclosure of the image at issue here.

15. Defendant Aaron Minc resides in Cuyahoga County, Ohio. He is Max Miller's counsel in the prosecution of a defamation action in Cuyahoga County against Emily Moreno. When

disclosing the image at issue here, he acted in conspiracy with Miller and as his agent—but for no legitimate litigation purpose because the image at issue had nothing to do with that suit’s allegations. This was simply a ham-handed, reckless public-relations move—not a lawyerly function.

16. Defendant Minc LLC is a law firm in Cuyahoga County, Ohio of which Aaron Minc is the founding principal. It is liable under respondeat superior, under organizational criminal (and thus under Ohio law, civil) liability, because Minc used its tools and resources to commit the illegal acts stated here, and because Minc engaged in these reckless acts to make money for and benefit the firm.

JURISDICTION AND VENUE

17. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331, 2201 for federal claims under 15 U.S.C. § 6851.

18. This Court has supplemental jurisdiction over the state-law claims under 28 U.S.C. § 1367.

19. This Court has personal jurisdiction over Defendants, who reside in and conduct business in this District.

20. Venue is proper under 28 U.S.C. § 1391, because the events giving rise to the claims took place within this District.

FACTS

21. Max Miller is a U.S. Representative who represents Ohio’s 7th Congressional District. He is up for reelection in November 2026.

22. Miller and Ms. Moreno were married but finalized their divorce in June 2025. They share a daughter, R.M.

23. Since their divorce, the pair have been embroiled in an unfortunately public custody dispute in which Miller's abusive behavior has been a driving issue. *See, e.g.*, Abby Vesoulis, *Rep. Max Miller Has a History of Withholding His Daughter's Blue Bunny*, MOTHER JONES (Aug. 4, 2026), at <https://www.motherjones.com/politics/2026/08/rep-max-miller-has-a-history-of-withholding-his-daughters-blue-bunny/>.

24. Defendant Miller, represented by Defendant Minc, sued Ms. Moreno in the Court of Common Pleas in Cuyahoga County for defamation after an article from British tabloid *The Daily Mail* published a report about the existence of allegations that Miller, during their marriage, threw scalding water on Ms. Moreno and sprayed her with the sink hose.

25. Miller's suit and his touting of it brought even more public attention to allegations of abuse against Miller, who has also been accused of abusing at least three women, including Ms. Moreno, and of abusing R.M.

26. Allegations of abuse against R.M. are not at issue in the defamation lawsuit. Miller's complaint against Ms. Moreno is limited to *The Daily News's* report of scalding-water incident.

27. On Sunday, August 2, 2026, at about 10:00 AM, Miller hosted a public livestream on his X.com account using his handle @MaxMillerOH. During the video, Miller argued against allegations that he abused Ms. Moreno and R.M. *See generally* X.com video, filed manually as Ex. 3.

28. Miller has more than 57,000 followers on X.com. In the days following his livestream, Miller's name trended on the social-media website several times.

29. Miller has also been under fire in the media because of his own efforts to amplify the abuse allegations, garnering national and international attention. In that moment, eyes from all over the nation and world were on him.

30. During the stream, Miller said he would post a link to “evidence” he claimed exonerated him. He urged viewers to “take a look at the documents” that he had made accessible to them with Minc’s help. *Id.* at 18:56–58. *See also id.* at 10:33–42, 11:40–49, 11:56–24, 14:34–36, 15:34–40, 19:25–30 (repeatedly urging viewers to look in the Dropbox folder).

31. At 10:23 AM, Miller posted a link to a public Dropbox folder labeled “Miller media folder,” distributing it to his thousands of followers. *See* Max Miller (@MaxMillerOH), X.COM (Aug. 2, 2026, 10:23 AM), at <https://x.com/MaxMillerOH/status/2083921641503867284>, attached as **Ex. 4**. Aaron Minc was listed as the folder’s owner. *See* screenshot, **Ex. 5**.

32. Within a little more than 24 hours, Miller’s original X post linking the open electronic Dropbox folder for the world to see had more than **204,000** views. As of August 10, 2026, that number grew to more than **233,000** views.



33. When he published the folder, Minc set the folder to allow public access, meaning that anyone could have downloaded the files it contained without creating an account, logging in, or otherwise being held easily accountable. And the folder was on the internet, meaning

downloaders weren't just Ohioans. Defendants enabled interstate, and indeed international, access.

34. At 11:00 AM, Miller posted, "Just to be clear: these documents were produced by my personal attorneys and paid for by me directly." *See* Max Miller (@MaxMillerOH), X.COM (Aug. 2, 2026 11:00 AM), at <https://x.com/MaxMillerOH/status/2083930875138367578>, attached as Ex. 6.



35. At first, the Dropbox link went down momentarily. At 11:12 AM, Miller posted, "Apparently, there are people who don't want this information out. Strange. Don't worry, Dropbox will be back up momentarily." *See* Max Miller (@MaxMillerOH), X.COM (Aug. 2, 2026 11:12 AM), at <https://x.com/MaxMillerOH/status/2083933882471084216>, attached as Ex. 7.

36. Minc claimed later in an email that viewers, to whom he granted editor privilege, had deleted all the files in the Dropbox. A. Minc, email, (Aug. 3, 2026, 7:32 PM), attached as Ex. 2.

37. Minc restored the documents in the Dropbox folder, republishing them.

38. At 11:22 AM, Miller posted, “Dropbox back online. Take a look.” *See* Max Miller (@MaxMillerOH), X.COM (Aug. 2, 2026 11:32 AM), at <https://x.com/MaxMillerOH/status/2083939064462422509>, attached as Ex. 8. Miller distributed a link to the Dropbox folder for the second time.

39. The folder contained several subfolders with various documents and media files, including police reports, recorded conversations between Ms. Moreno and Miller, and court documents.

40. The files were organized by topic.

41. Folder 03_Feb_1_Custody_Exchange contained a PDF of messages between Ms. Moreno and Miller sent using OurFamilyWizard, a parenting app that the domestic-relations court had ordered the pair to use to communicate. That PDF was titled “EX-306_OFW-Messages-Feb-1-to-25-2026-with-Attachments.”

42. An August 2, 2026, 10:40 AM download of the file contained a nude image of R.M. on page 53. The photo was labeled IMG_9158.

43. The intimate image depicts R.M.’s uncovered genitals, specifically R.M.’s labia. A pediatrician confirms this. (*See* Dr. B. Gascoigne, expert letter, (Aug. 11, 2026), Ex. 1.

44. The intimate image also shows a large, yellow bruise on R.M.’s shoulders, an image taken after the child was in Miller’s custody. She was diagnosed with a broken collarbone.

45. R.M. is easily identified in the document by information displayed in connection with the visual depiction. That is, her name appears in the document, unredacted, more than 70 times.

46. The intimate image was also present in an 11:32 AM download of the files, after Minc republished them.

47. According to Minc, the image remained online for anyone to download for about 23 hours. *See* A. Minc, email, (Aug. 3, 2026 7:32 PM), attached as **Ex. 2**.

48. Neither R.M. nor her mother consented to Defendants sharing the intimate image with the world.

49. Miller and Minc knew or recklessly disregarded that neither R.M. nor Ms. Moreno consented to that image's disclosure and publication. Because Ms. Moreno had counsel, Minc did not speak with her to get her consent. Miller specifically distributed the link to try to publicly humiliate and discredit Ms. Moreno, acting without her permission or consent, and uncaringly using a nude image of his daughter in the process.

50. Miller and Minc did not publish or distribute the image in good faith to a law-enforcement officer or agency; as part of a legal proceeding; as part of medical education, diagnosis, or treatment; or to report or investigate unlawful content or unsolicited or unwelcome conduct. They published it to try to harm Ms. Moreno publicly, consequences to R.M. be damned.

51. At 6:40 PM on August 3, 2026, Ms. Moreno's counsel wrote Minc to demand details about why Defendants had published and distributed R.M.'s nude image and what they were going to do about it. *See* S. Chandra, letter (Aug. 3, 2026), attached as **Ex. 9**.

52. Responding, Minc admitted that he published a pre-redaction, unedited version of the document, which included the nude image. *See* A. Minc, email (Aug. 3, 2026 7:32 PM), attached as **Ex. 2**. Minc said he did not realize his mistake until 9:40 AM on August 3, 2026, about 23 hours after the initial publication.

53. "I was under an enormous amount of pressure to get the files and link live again as quickly as possible." Minc admitted. But, in his reckless haste to assist Miller with his public-

relations assault, and pressured by a manic and furious Miller who was intent on maligning his ex-wife online, Minc failed to ensure that the files, which contained a R.M.'s nude image, were properly redacted.

54. Minc claimed that he initially redacted the R.M.'s nude image, demonstrating his knowledge that earlier versions of the files, once restored, would contain that image. A. Minc, email, (Aug. 3, 2026 7:32 PM), attached as Ex. 2. Minc knew that, by restoring the files to an earlier state, he ran the risk of sharing R.M.'s nude picture.

55. Minc claimed in his email that he had reviewed and redacted the files before they were initially shared and publicly posted. Yet a download of the file taken at 10:40 AM, minutes after Miller shared the initial link, contained R.M.'s name and photos of her, including the intimate image. So did a 11:32 AM download. If Minc truly redacted information in the original upload, yet chose not to redact or remove the name and photos, then Defendants' public disclosure of the name and photos in the original upload wasn't just reckless—it was intentional.

56. Minc also admitted that he granted administrative access to every user who entered the folder, so, to their heart's content, they could delete files and restore previous files—which contained the nude and other images of R.M. Because Minc placed the nude image Miller provided in the folder in the first place, no matter how many times it was redacted or deleted, any user could restore access to it.

57. Minc further admitted that he was responsible for “reviewing, adding, deciding, or making any changes to the information that was in this folder.” *Id.* He was responsible for publishing the photo in the first place, though Miller was responsible for then recklessly distributing the image he had provided Minc through his public X.com account.

58. Minc tried to fall on his sword and take the blame. A. Minc, email, (Aug. 3, 2026 7:32 PM), attached as **Ex. 2**. But Miller gave Minc the intimate image to distribute in the first place. The creation metadata for the documents in the Dropbox folder said that Miller's congressional office created them; Minc changed the metadata to read "Minc Law LLC." Daniel Lippman (@dlippman), X.COM (Aug. 5, 2026 9:16 AM), at <https://x.com/dlippman/status/2084991823546663197?s=20>.

59. Apparently, without instructions to remove the intimate image, or even checking, Miller distributed the link to the folder publicly. Intent on publicly trashing his ex-wife, he disregarded his daughter and recklessly failed to review the folder he shared with her intimate image, before sharing it with the world. He just didn't care, as long as he could try to convince people that the sheer volume of material in the folder should cause them to doubt the many abuse allegations, from many quarters, against him.

60. Minc refused to answer repeated questions about how many people accessed or downloaded the intimate image of R.M. and what steps he and Miller were taking to undo the damage.

61. Rather than answer those questions and take accountability for his actions, Minc began criticizing Ms. Moreno's counsel for raising questions about the images.

62. Minc also lied to newspaper reporters about the image, claiming that R.M. was partially clothed. *See, e.g.,* Mia McCarthy and Riley Rogerson, *Max Miller's lawyer admits to accidentally releasing 'private images' of daughter*, POLITICO (Aug. 4, 2026), at <https://www.politico.com/live-updates/2026/08/04/congress/max-miller-daughter-abuse-image-01023575>, attached as **Ex. 10**.

While the Dropbox folder contained an image of R.M. topless, it also contained an image of

R.M. in which she is nude and her genitals are visible. It is the latter image that is the subject of this suit.

63. Miller's recklessness is underscored by the fact that any parent knows—in this era and world filled with pedophiles, creeps, and AI-generated image alteration and video generation—not to put nude pictures of their child, or any child, on the public internet.

64. Litigators who regularly handle allegations of sexual abuse like Minc know that, too.

65. Under 15 U.S.C. § 6851, R.M. is entitled to \$150,000 in liquidated damages for each time her image was downloaded from Minc's and Miller's public Dropbox. She is also entitled to reasonable attorney fees and other litigation costs. Defendants must preserve and provide data about how many times they victimized R.M.

CLAIMS

CLAIM 1

CIVIL ACTION RELATING TO DISCLOSURE OF INTIMATE IMAGES, FOR DAMAGES AND INJUNCTIVE RELIEF, UNDER 15 U.S.C. § 6851 AGAINST DEFENDANTS MAX L. MILLER, AARON MINC, AND MINC LLC

66. Plaintiff incorporates all previous allegations.

67. Title 15 U.S.C. § 6851(b)(1)(A) establishes a federal civil cause of action by an individual whose intimate visual depiction is disclosed, in or affecting interstate or foreign commerce or using any means or facility of interstate or foreign commerce, without the consent of the individual, where such disclosure was made by a person who knows that, or recklessly disregards whether, the individual has not consented to such disclosure, may bring a civil action against that person in an appropriate district court of the United States

for actual damages or liquidated damages of \$150,000 for each disclosure and injunctive relief, along with the costs of the action, including reasonable attorney fees and litigation costs.

68. Title 15 U.S.C. § 6851(a) defines key terms in the statute that apply here:

(2) Consent

The term “consent” means an affirmative, conscious, and voluntary authorization made by the individual free from force, fraud, misrepresentation, or coercion.

(3) Depicted individual

The term “depicted individual” means an individual whose body appears in whole or in part in an intimate visual depiction and who is identifiable by virtue of the person’s face, likeness, or other distinguishing characteristic, such as a unique birthmark or other recognizable feature, or from information displayed in connection with the visual depiction.

(4) Disclose

The term “disclose” means to transfer, publish, distribute, or make accessible.

(5) Intimate visual depiction

The term “intimate visual depiction”—

(A) means a visual depiction, as that term is defined in section 2256(5) of title 18, that depicts—

(i) the uncovered genitals, pubic area, anus, or post-pubescent female nipple of an identifiable individual; ...

69. Defendants violated 15 U.S.C. § 6851(b)(1)(A)’s prohibition against disclosing these intimate visual depictions of a depicted individual by disclosing—that is publishing, distributing, making the images accessible to the public, and transferring through the Dropbox file-sharing service—a nude photo of R.M. depicting her genitals—in or affecting interstate or foreign commerce and using any means or facility of interstate or foreign commerce, without R.M.’s or her mother’s consent, and knowing that, and recklessly disregarding whether, anyone consented.

70. Defendants are liable to R.M. for actual damages or liquidated damages of \$150,000 per disclosure (transfer, publishing, distribution, or making accessible), and equitable relief.

71. Defendants' acts were willful, egregious, malicious, and worthy of substantial sanction to punish and deter Defendants and others from engaging in this type of unlawful conduct. Their acts also merit injunctive relief.

CLAIM 2
CIVIL LIABILITY FOR CRIMINAL ACTS UNDER OHIO REV. CODE § 2307.60 (A)(1),
INCLUDING, BUT NOT LIMITED TO:

(A) ILLEGAL USE OF MINOR OR IMPAIRED PERSON IN NUDITY-ORIENTED MATERIAL OR
PERFORMANCE (§ 2907.323(A)(2));

COMBINED WITH

(B) § 2923.02 (ATTEMPT), AND

(C) § 2923.03 (COMPLICITY)

AGAINST DEFENDANTS MAX MILLER, AARON MINC, AND MINC LLC

72. Plaintiff incorporates all previous allegations.

73. Ohio Rev. Code § 2307.60 provides: "Anyone injured in person or property by a criminal act has, and may recover full damages in, a civil action." Ohio Rev. Code § 2307.60(A)(1).

Section 2307.60 "independently authorize[s] a civil action for damages caused by criminal acts."

Jacobson v. Kaforey, 149 Ohio St. 3d 398, 399 (2016). And no proof of an underlying criminal conviction is required when bringing a civil action under § 2307.60. *Buddenberg v. Weisdack*, 161 Ohio St. 3d 160, 2020-Ohio-3832, 161 N.E.3d 603, ¶ 11.

74. For the Court's convenience, criminal acts Defendants committed are consolidated under this single claim, although any single one of them would establish separate civil liability under § 2307.60.

75. Ohio Rev. Code § 2907.323(A)(2) (Illegal use of minor or impaired person in nudity-oriented material or performance) provides as follows:

(A) No person shall do any of the following:

(2) ... use or transfer a material... of that nature [a person's child or ward who is a minor... in a state of nudity], unless the material... is... disseminated, displayed, possessed, controlled, brought or caused to be brought into this state, or presented for a bona fide artistic, medical, scientific, educational, religious, governmental, judicial, or other proper purpose, by or to a physician, psychologist, sociologist, scientist, teacher, person pursuing bona fide studies or research, librarian, member of the clergy, prosecutor, judge, or other person having a proper interest in the material or performance....

76. None of the exceptions in the statute authorized Defendants' transfer and dissemination of the image of the child in a state of nudity.

77. Ohio Rev. Code § 2923.02(A) (**Attempt**) provides that "No person, purposely or knowingly, and when purpose or knowledge is sufficient culpability for the commission of an offense, shall engage in conduct that, if successful, would constitute or result in the offense."

(This claim incorporates all other offenses.)

78. Ohio Rev. Code § 2923.03(A) (**Complicity**) provides that no person, acting with the kind of culpability required for the commission of an offense, shall

(1) solicit or procure another to commit the offense;

(2) aid or abet another in committing the offense;

(3) conspire with another to commit the offense in violation of section 2923.01 of the Revised Code; or

(4) cause an innocent or irresponsible person to commit the offense.

79. Those who commit complicity may be criminally prosecuted and punished as if they were the principal offender.

80. Ohio Rev. Code § 2921.03(A)(4) (**Complicity**) provides that, it is a crime to “cause an innocent or irresponsible person to commit the offense.” (This claim incorporates all other offenses.)

81. Defendants’ conduct detailed in the facts section above and more constituted criminal acts under the above and other criminal laws.

82. The conduct complained of above constitutes criminal acts by the individual Defendants, individually and through personal accountability for organizational conduct under Ohio Rev. Code § 2901.24, and through vicarious and organizational criminal liability under Ohio Rev. Code § 2901.23.

83. Individual Defendant Aaron Minc is an agent and employee of Minc LLC, acting on behalf of that company within the scope of his office or employment.

84. Acting on behalf of Minc LLC, within the scope of his office or employment, and with the kind of culpability required for the commission of the criminal offenses identified above, Aaron Minc authorized, requested, commanded, and tolerated Minc LLC’s criminal conduct.

85. Aaron Minc is an agent and employee of Minc LLC as defined in Ohio Rev. §§ 2901.23 and 2901.24 and acted with the kind of culpability required for the commission of the offenses.

At least one of the following applies:

- a. In the name of the organization or on its behalf, he engaged in conduct constituting the offense; and
- b. He had the primary responsibility to discharge a duty imposed on the organization by law—the duty not to recklessly share nude images of children—and did not discharge that duty.

86. As a direct and proximate result of this unlawful conduct, R.M. has suffered and will continue to suffer economic and non-economic damages for which Defendants are liable, including, but not limited to, emotional distress; pain and suffering; loss of reputation; and the earnings.

87. Defendants' acts were willful, egregious, malicious, and worthy of substantial sanction to punish and deter Defendants and others from engaging in this type of unlawful conduct.

CLAIM 3
WRONGFUL-INTRUSION INVASION OF PRIVACY
AGAINST DEFENDANTS MAX MILLER AND AARON MINC

88. Plaintiff incorporates all previous allegations.

89. Wrongful intrusion type of invasion of privacy is defined as the wrongful intrusion into one's private activities in such a manner as to outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities. The interest protected is primarily a mental one rather than economic or pecuniary. Actual damage is not necessary.

90. By disclosing her intimate image to the world, Defendants wrongfully intruded upon and invaded R.M.'s privacy.

91. As a direct and proximate result of this unlawful conduct, R.M. will suffer economic and non-economic damages for which Defendants are liable, including, but not limited to, emotional distress; pain and suffering; reputational harm; and the loss of earnings.

92. Defendants' acts were willful, egregious, malicious, and worthy of substantial sanction to punish and deter Defendants and others from engaging in this type of unlawful conduct.

CLAIM 4
NEGLIGENCE
AGAINST DEFENDANTS MAX MILLER, AARON MINC, AND MINC LLC

93. Plaintiff incorporates all previous allegations.

94. Defendants failed to exercise the care that reasonably prudent people or organizations would exercise in a similar situation, resulting in injury.

95. They owed a duty of care to R.M.

96. They breached that duty.

97. The organizational defendant, Minc LLC, is vicariously liable for the negligence.

98. As a direct and proximate result of this unlawful conduct, R.M. will suffer economic and non-economic damages for which Defendants are liable, including, but not limited to, emotional distress; pain and suffering; reputational harm; and the loss of earnings.

99. Defendants' acts were willful, egregious, malicious, and worthy of substantial sanction to punish and deter Defendants and others from engaging in this type of unlawful conduct.

CLAIM 5
CIVIL CONSPIRACY
AGAINST DEFENDANTS MAX MILLER, AARON MINC, AND MINC LLC

100. Plaintiff incorporates all previous allegations.

101. Defendants civilly conspired with one another to commit the above legal violations.

102. As a direct and proximate result of this unlawful conduct, R.M. will suffer economic and non-economic damages for which Defendants are liable, including, but not limited to, emotional distress; pain and suffering; reputational harm; and the loss of earnings.

103. Defendants' acts were willful, egregious, malicious, and worthy of substantial sanction to punish and deter Defendants and others from engaging in this type of unlawful conduct.

PRAYER FOR RELIEF

For these reasons, Plaintiff respectfully requests the following relief from the Court:

1. Declare that Defendants' acts and conduct constitute violations of federal and Ohio law;
2. Enter judgment in R.M.'s favor as to all claims for relief;
3. Award R.M. full compensatory damages, economic and non-economic, including, but not limited to, damages for pain and suffering, mental anguish, emotional distress, humiliation, and inconvenience that R.M. is reasonably certain to suffer;
4. Award R.M. \$150,000 in statutory, liquidated damages for every time someone accessed, transferred, distributed, published, or downloaded the image of R.M., which Defendants, by making the Dropbox folder available, enabled transfer and dissemination to third parties.
5. Award R.M. punitive damages for Defendants' intentional and malicious violations of federal and Ohio law;
6. Award prejudgment and post-judgment interest at the highest lawful rate;
7. Award R.M. her reasonable attorney fees (including expert fees) and all other costs of this suit;
8. Enjoin Defendants from further misconduct;
9. Award all other relief in law or equity to which R.M. is entitled and that the Court considers equitable, just, or proper.

Dated: August 12, 2026

Respectfully submitted,

THE CHANDRA LAW FIRM LLC

/s/Subodh Chandra

Subodh Chandra (0069233)

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Cleveland, Ohio 44113-1326

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*Attorneys for Plaintiff R.M. through her mother, Emily
Moreno*

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

R.M., a Minor Child Through Her Mother, Emily Moreno

(b) County of Residence of First Listed Plaintiff _____

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

The Chandra Law Firm LLC
1265 W. 6th Street, STE. 400 Cleveland, OH 44113**DEFENDANTS**

Max L. Miller, Aaron Minc, Minc LLC

County of Residence of First Listed Defendant _____

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	PERSONAL INJURY	☐ 625 Drug Related Seizure of Property 21 USC 881	☐ 422 Appeal 28 USC 158	☐ 375 False Claims Act
☐ 120 Marine	☐ 310 Airplane	☐ 690 Other	☐ 423 Withdrawal 28 USC 157	☐ 376 Qui Tam (31 USC 3729(a))
☐ 130 Miller Act	☐ 315 Airplane Product Liability		PROPERTY RIGHTS	☐ 400 State Reapportionment
☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander		☐ 820 Copyrights	☐ 410 Antitrust
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Federal Employers' Liability		☐ 830 Patent	☐ 430 Banks and Banking
☐ 151 Medicare Act	☐ 340 Marine		☐ 835 Patent - Abbreviated New Drug Application	☐ 450 Commerce
☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)	☐ 345 Marine Product Liability		☐ 840 Trademark	☐ 460 Deportation
☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 350 Motor Vehicle	LABOR	☐ 880 Defend Trade Secrets Act of 2016	☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 160 Stockholders' Suits	☐ 355 Motor Vehicle Product Liability	☐ 710 Fair Labor Standards Act	SOCIAL SECURITY	☐ 480 Consumer Credit (15 USC 1681 or 1692)
☐ 190 Other Contract	☐ 360 Other Personal Injury	☐ 720 Labor/Management Relations	☐ 861 HIA (1395ff)	☐ 485 Telephone Consumer Protection Act
☐ 195 Contract Product Liability	☐ 362 Personal Injury - Medical Malpractice	☐ 740 Railway Labor Act	☐ 862 Black Lung (923)	☐ 490 Cable/Sat TV
☐ 196 Franchise		☐ 751 Family and Medical Leave Act	☐ 863 DIWC/DIWW (405(g))	☐ 850 Securities/Commodities/Exchange
		☐ 790 Other Labor Litigation	☐ 864 SSID Title XVI	☐ 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	☐ 791 Employee Retirement Income Security Act	☐ 865 RSI (405(g))	☐ 891 Agricultural Acts
☐ 210 Land Condemnation	☒ 440 Other Civil Rights	IMMIGRATION	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 893 Environmental Matters
☐ 220 Foreclosure	☐ 441 Voting	☐ 462 Naturalization Application	☐ 871 IRS—Third Party 26 USC 7609	☐ 895 Freedom of Information Act
☐ 230 Rent Lease & Ejectment	☐ 442 Employment	☐ 465 Other Immigration Actions		☐ 896 Arbitration
☐ 240 Torts to Land	☐ 443 Housing/Accommodations			☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
☐ 245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment			☐ 950 Constitutionality of State Statutes
☐ 290 All Other Real Property	☐ 446 Amer. w/Disabilities - Other			
	☐ 448 Education			
	PRISONER PETITIONS			
	Habeas Corpus:			
	☐ 463 Alien Detainee			
	☐ 510 Motions to Vacate Sentence			
	☐ 530 General			
	☐ 535 Death Penalty			
	Other:			
	☐ 540 Mandamus & Other			
	☐ 550 Civil Rights			
	☐ 555 Prison Condition			
	☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. §§ 1331, 2201; 15 U.S.C. § 6851

Brief description of cause:

Dissemination of intimate images, civil liability for criminal acts under Ohio law, various additional state-law claims

VII. REQUESTED IN COMPLAINT:☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

August 12, 2026

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

I.

Civil Categories: (Please check one category only).

- | | | |
|----|--|---------------------------------------|
| 1. | ☒ | General Civil |
| 2. | ☐ | Administrative Review/Social Security |
| 3. | ☐ | Habeas Corpus Death Penalty |

*If under Title 28, §2255, name the SENTENCING JUDGE: _____

CASE NUMBER: _____

II.

RELATED OR REFILED CASES See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action: ☐ is **RELATED** to another **PENDING** civil case ☐ is a **REFILED** case ☐ was **PREVIOUSLY REMANDED**

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III.

In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant** If the defendant resides in a county within this district, please set forth the name of such county

COUNTY:

Corporation For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

COUNTY:

(3) **Other Cases** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

COUNTY:

IV.

The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

EASTERN DIVISION

☐
☒
☐

AKRON
CLEVELAND
YOUNGSTOWN

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)
(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake, Lorain, Medina and Richland)
(Counties: Columbiana, Mahoning and Trumbull)

WESTERN DIVISION

☐

TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca VanWert, Williams, Wood and Wyandot)

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

BRADLEY GASCOIGNE, M.D.

August 11, 2026

To whom it may concern:

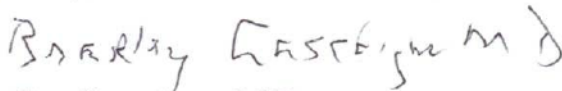
I am a medical doctor, trained in pediatrics, and currently licensed in the state of Ohio. I have practiced pediatric medicine for 43 years. Given that experience, I can recognize pediatric female anatomy.

I have been asked to review the image of a female toddler disclosed to the public on August 2, 2025 by Max Miller, Aaron Minc, and Minc LLC.

I am not charging for the review.

I can confirm that the child's photo depicts her external genitalia, that is, her labia.

Sincerely,

A handwritten signature in black ink that reads "Bradley Gascoigne M.D." in a cursive, slightly slanted script.

Bradley Gascoigne, M.D.

EXHIBIT

1



Emily Bohatch <emily.bohatch@chandraLaw.com>

Miller v. Moreno — important correspondence

Subodh Chandra <subodh.chandra@chandraLaw.com>

Mon, Aug 3, 2026 at 6:40 PM

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britoplpc.com>, Larry Zukerman <lwz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandraLaw.com>

Dear Mr. Minc:

Please respond to the attached letter by the close of business on August 5.

Sincerely,

Mr. Subodh Chandra (he/him)



Berkeley | San Diego | Cleveland | Santa Fe | Reno

888.500.5025, ext. 101 office

Subodh.Chandra@ChandraLaw.com

www.ChandraLaw.comBiography: <https://www.chandraLaw.com/about/meet-the-team/subodh-chandra>

Bluesky: @subodhchandra.bsky.social/ and @chandraLaw.bsky.social • Twitter:

@ChandraLawFirm • @SubodhChandra • Facebook: The Chandra Law Firm LLC

Your case is our cause.®

This email may contain privileged or confidential information. If it wasn't for you, then please delete it and let us know.



2026-08-03 S. Chandra to A. Minc re CSAM release for Miller.pdf
153K

EXHIBIT 2

August 3, 2026

Via email to Aminc@minclaw.com

Aaron Minc, Esq.
Minc Law
200 Park Ave. Suite 200
Cleveland, OH 44122

Re: *Miller v. Moreno*, Cuyahoga County Case No. CV-26-138810

Dear Mr. Minc:

Yesterday, you enabled your client, Congressman Max Miller, to share and disseminate to the public an electronic Dropbox folder of materials. This was in conjunction with a video rant about our client, Emily Moreno, that Miller posted on X.

The first time Miller shared the folder, it contained private images of Miller and Ms. Moreno's daughter and left her name unredacted. At least one of those images could be considered Child Sexual Abuse Material (CSAM) because the daughter's genitals appear to be visible. The photo was in a document entitled EX-306_OFW-Messages-Feb-1-to-25-2026-with-Attachments and labeled IMG_9158 in the bottom-right corner. The post with the link to the folder—published under your name—garnered over **204,000 views** from the time it was posted until this afternoon.

We write to demand an explanation about how this occurred.

- (1) Whose idea was it to share this intimate image of the child?
- (2) Why did your firm share it?
- (3) Did you or your firm vet the images before sharing them? Did anyone? Who?
- (4) Who removed the images from the second folder and why? Was it because someone realized that it was ill-advised (and in the case of the potential CSAM image, illegal) to share these images with the world?
- (5) How many people accessed and downloaded the intimate image, and each of the other images of the child, including one in which her chest is exposed?
- (6) Who accessed and downloaded the image?
- (7) What are you going to do about this?

We view this matter with the utmost seriousness and hope you and your client do as well. Please respond by the close of business on **August 5, 2026**. Honest responses should not take long.

Sincerely,



Subodh Chandra

Cc: Alejandro Brito, Esq.
Larry Zuckerman, Esq.
Andrew Zashin, Esq.

Miller v. Moreno — important correspondence

Aaron Minc <Aminc@minclaw.com>

Mon, Aug 3, 2026 at 7:32 PM

To: Subodh Chandra <subodh.chandra@chandrafirm.com>

Cc: Alejandro Brito <abrito@britopllc.com>, Larry Zukerman <l wz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandrafirm.com>

To be as straight forward as possible about this.

An initial link to the dropbox folder went live and a few members of the public somehow gained edit access to the Dropbox folder and were able to delete all of the files in the folder (see below). It was not long after things had gone live. It was alarming. I was under an enormous amount of pressure to get the files and link live again as quickly as possible.

I reverted and restored the folder. It was to the most recent prior version of a recovery point of what had been saved. It was a version where some files were in a pre-redaction state or there were files not released originally that reappeared. I quickly went through and re-did every redaction and file deletion that I saw. I unfortunately missed deleting the last three pages from that one file as I had originally or missed deleting that file. I had no idea. It was not intentional. I found out this morning around 9:40AM and deleted it immediately.

It all happened very quickly and was very confusing because I kept deleting things and immediately some anonymous user at the same time instantly kept restoring some things as I was deleting them, and simultaneously trying to change and block the access (See below).

On Saturday, when I gathered the files to be published, I did multiple passes and searches to redact and delete anything with [REDACTED]'s name throughout or where any other private information was. I bleeped audio mentions of [REDACTED]'s name. I converted a video file into audio so her image would not potentially appear. I redacted addresses and dates of birth. I delete [REDACTED] a data or converted files into pdf to delete the meta data where relevant.

I am truly sorry and deeply regret the error. It was completely my fault and unintentional. Max Miller did not know. Know one on his team knew. I did not know. I was the only person who was responsible for reviewing, adding, deciding, or making any changes to the information that was in this folder.

	Jobie Shally deleted the folder 05_Additional_Evidence in Miller Media Folder	Yesterday 10:52 AM
	Jobie Shally deleted EX-406_Notice-of-Manual-Filin...07-08.pdf and 10 more files in Miller Media Folder	Yesterday 10:52 AM
	Jobie Shally deleted the folder 04_The_Court_Record in Miller Media Folder	Yesterday 10:52 AM
	Jobie Shally deleted EX-201_AUDIO-Moreno-Never...8-07.mp3 and 10 more files in Miller Media Folder	Yesterday 10:52 AM
	Jobie Shally deleted the folder 02_Domestic_Abuse_Allegation in Miller Media Folder	Yesterday 10:52 AM
	Jobie Shally deleted EX-304_VIDEO-Ring-Moreno-L...2-01.MP4 and 7 more files in Miller Media Folder	Yesterday 10:52 AM
	Jobie Shally deleted the folder 03_Feb_1_Custody_Exchange in Miller Media Folder	Yesterday 10:52 AM
	Jobie Shally deleted EX-107_Miller-Sworn-Affidavit-...26-03.pdf and 7 more files in Miller Media Folder	Yesterday 10:51 AM
	Jobie Shally deleted the folder 01_Child_Abuse_Allegations in Miller Media Folder	Yesterday 10:51 AM
	Jobie Shally deleted the folder 00_START_HERE in Miller Media Folder	Yesterday 10:51 AM
	Jobie Shally deleted the file 00_READ-ME-FIRST.pdf in Miller Media Folder	Yesterday 10:51 AM
	Jobie Shally deleted the file 01_CHRONOLOGY-OF-RECORD.pdf in Miller Media Folder	Yesterday 10:50 AM
	Jobie Shally deleted the file 02_SUMMARY-FOR-REPORTERS.pdf in Miller Media Folder	Yesterday 10:50 AM
	Jobie Shally deleted the file EXHIBIT-INDEX.pdf in Miller Media Folder	Yesterday 10:50 AM
	sarah parcak joined the shared folder Miller Media Folder	Yesterday 10:50 AM
	Dean DePiero joined the shared folder Miller Media Folder	Yesterday 10:49 AM
	Jobie Shally joined the shared folder Miller Media Folder	Yesterday 10:48 AM

	Gary Busey restored 00_READ-ME-FIRST.docx and 12 more files in Miller Media Folder	Yesterday 11:17 AM
	Gary Busey restored _converted_images and 2 more folders in Miller Media Folder	Yesterday 11:17 AM
	You deleted the file EXHIBIT-INDEX.docx in Miller Media Folder	Yesterday 11:17 AM
	You deleted the file EX-517_VIDEO-Custody-Trans...7-19.mp4 in Miller Media Folder	Yesterday 11:14 AM
	You deleted the folder _converted_images in Miller Media Folder	Yesterday 11:14 AM
	You deleted the file 00_READ-ME-FIRST.docx in Miller Media Folder	Yesterday 11:14 AM
	You deleted the file 01_CHRONOLOGY-OF-RECORD.docx in Miller Media Folder	Yesterday 11:14 AM
	You deleted the file 02_SUMMARY-FOR-REPORTER...opy.docx in Miller Media Folder	Yesterday 11:14 AM
	You deleted the file 02_SUMMARY-FOR-REPORTERS.docx in Miller Media Folder	Yesterday 11:14 AM
	You deleted IMG_1611.jpg and 7 more files in Miller Media Folder	Yesterday 11:13 AM
	You deleted _INTERNAL_DO_NOT_RELEASE and 1 more folders in Miller Media Folder	Yesterday 11:13 AM
	Gary Busey restored IMG_1611.jpg and 7 more files in Miller Media Folder	Yesterday 11:13 AM
	Gary Busey restored the folder _INTERNAL_DO_NOT_RELEASE in Miller Media Folder	Yesterday 11:13 AM
	Gary Busey restored the folder _converted_images in Miller Media Folder	Yesterday 11:13 AM
	You deleted IMG_1611.jpg and 7 more files in Miller Media Folder	Yesterday 11:12 AM

	You deleted the file EXHIBIT-INDEX.pdf in Miller Media Folder	Yesterday 11:24 AM
	You deleted the folder 06_Exhibit_Index in Miller Media Folder	Yesterday 11:24 AM
	You deleted the file EX-512_Screenshot-Autopay-P...-08-04.jpg in Miller Media Folder	Yesterday 11:22 AM
	Gary Busey restored the file EX-512_Screenshot-Autopay-P...-08-04.jpg in Miller Media Folder	Yesterday 11:21 AM
	You deleted EX-208_Signal-Message-Never...08-13.png and 1 more files in Miller Media Folder	Yesterday 11:21 AM
	You deleted the file EX-512_Screenshot-Autopay-P...-08-04.jpg in Miller Media Folder	Yesterday 11:19 AM
	You deleted the file EX-512_Screenshot-Autopay-P...08-04.pdf in Miller Media Folder	Yesterday 11:19 AM
	You deleted the file EX-511_Photo-Moreno-Nappi...08-26.pdf in Miller Media Folder	Yesterday 11:19 AM
	You deleted the file EX-511_Photo-Moreno-Nappi...-08-26.jpg in Miller Media Folder	Yesterday 11:19 AM
	You deleted EX-517_VIDEO-Custody-Trans...7-19.mp4 and 4 more files in Miller Media Folder	Yesterday 11:18 AM
	You deleted the folder _converted_images in Miller Media Folder	Yesterday 11:18 AM
	You deleted IMG_1611.jpg and 7 more files in Miller Media Folder	Yesterday 11:17 AM
	You deleted _INTERNAL_DO_NOT_RELEASE and 1 more folders in Miller Media Folder	Yesterday 11:17 AM

Aaron Minc
Attorney & CEO



Defamation Removal Law
Online Reputation &
Brand Protection Lawyers

Aminc@Minclaw.com

Main: (216) 373-7706

Cell: (330) 703-0214

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Minclaw.com

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From: Subodh Chandra <subodh.chandra@chandalaw.com>

Sent: Monday, August 3, 2026 6:40 PM

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britopl.com>; Larry Zukerman <lwz@zukerman-law.com>; Andrew Zashin <aaz@zashinlaw.com>; Emily Bohatch <emily.bohatch@chandalaw.com>

Subject: Miller v. Moreno — important correspondence

8/11/26, 2:43 PM

Case: 1:26-cv-01899 Doc #: 1-3 Filed: 08/12/26 8 of 20 PageID #: 32

The Chandra Law Firm LLC Mail - Miller & Moreno - Important Correspondence

[Quoted text hidden]



Emily Bohatch <emily.bohatch@chandraLaw.com>

Miller v. Moreno — important correspondence

Subodh Chandra <subodh.chandra@chandraLaw.com>

Mon, Aug 3, 2026 at 8:06 PM

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britoplpc.com>, Larry Zukerman <l wz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandraLaw.com>

Counsel:

Thank you for responding. Most of our questions remain unanswered or avoided, including who else now has the child's images. Why were these images of the child, including the potential CSAM image, added to a public folder in Dropbox in the first place? Who decided what material to share and what not to share—particularly regarding the potential CSAM image? Miller distributed the electronic folder containing that material for hundreds of thousands of people to see, touting the importance of the "evidence." Are you claiming he had no idea what was in the folder?

And after Miller posted the folder at 10:30 am, the problematic images were available as early as 10:40 am, which is when we downloaded the folder and found the problematic material. The first restoration of an allegedly deleted folder did not occur, according to the screenshots you sent below, until 11:13 am. Your firm publicly posted, from the start, all the images, including the potential CSAM image. This doesn't appear to be a deletion-and-restoration problem. In any case, the images shouldn't have been in a folder intended for public consumption to begin with.

Given the gravity of the situation, our client expects answers to all questions.

Sincerely,

Mr. Subodh Chandra (he/him)

THE



Berkeley | San Diego | Cleveland | Santa Fe | Reno

888.500.5025 office • 216.965.6463 mobile

Subodh.Chandra@ChandraLaw.com

www.ChandraLaw.comBiography: <https://www.chandraLaw.com/about/meet-the-team/subodh-chandra>

Bluesky: @subodhchandra.bsky.social/ and @chandraLaw.bsky.social • Twitter:

@ChandraLawFirm • @SubodhChandra • Facebook: The Chandra Law Firm LLC

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This email may contain privileged or confidential information. If it wasn't for you, then please delete it and let us know.

[Quoted text hidden]



Emily Bohatch <emily.bohatch@chandalaw.com>

Miller v. Moreno — important correspondence

Aaron Minc <Aminc@minclaw.com>

Mon, Aug 3, 2026 at 8:11 PM

To: Subodh Chandra <subodh.chandra@chandalaw.com>

Cc: Alejandro Brito <abrito@britoplpc.com>, Larry Zukerman <l wz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandalaw.com>

I answered your questions as quickly as I could with everything I know. It is directly responsive most all of what you asked. I'm not avoiding answering any question.

I'm available tomorrow morning to discuss this more if you do not understand how that is not responsive to any question that you asked.

Regards,

Aaron Minc

- Sent on the go

From: Subodh Chandra <subodh.chandra@chandalaw.com>

Sent: Monday, 03 August 2026 20:06:00

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britoplpc.com>; Larry Zukerman <l wz@zukerman-law.com>; Andrew Zashin <aaz@zashinlaw.com>; Emily Bohatch <emily.bohatch@chandalaw.com>

Subject: Re: Miller v. Moreno — important correspondence

[Quoted text hidden]



Emily Bohatch <emily.bohatch@chandraLaw.com>

Miller v. Moreno — important correspondence

Aaron Minc <Aminc@minclaw.com>

Tue, Aug 4, 2026 at 1:11 PM

To: Subodh Chandra <subodh.chandra@chandraLaw.com>

Cc: Alejandro Brito <abrito@britoplpc.com>, Larry Zukerman <l wz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandraLaw.com>

Messr. Chandra, Zashin, and Ms. Bohatch,

I assume you are responsible for leaking your letter you sent me last night to the media. It appears your communication has created the false impression that I mass-distributed child pornography (CSAM), i.e., photos of two-year-olds' genitalia to the public.

Your accusations are completely outrageous and false. As you are well aware, the pictures in question were quite innocent. They were photos of a two-year-old girl who had her shirt off and was not in any type of sexualized, lewd, or lascivious pose. I am aware of no legal definition under which this could possibly constitute CSAM or genitalia. Likewise, the media seems to be under the mistaken impression that this was part of a legal filing. I am aware of none.

This is incredibly damaging to my reputation. As fellow legal professionals, I'd like to respectfully request and give all three of you the opportunity to do the right thing and issue a public statement retracting these ridiculous false allegations before this gets out of hand and causes irrevocable harm and monetary damage to my reputation. Time is of the essence. Please act immediately. Only you can stop this terrible lie from continuing to spread and correct the record by issuing a statement fully retracting these incredibly harmful and false accusations. Please CC me on any relevant correspondence to the press.

Thank you for your immediate attention to this matter.

Sincerely,

Aaron Minc
Attorney & CEO



Defamation Removal Law
Online Reputation &
Brand Protection Lawyers

Aminc@Minclaw.com

Main: (216) 373-7706

Cell: (330) 703-0214

Fax: (440) 792-5327

200 Park Avenue
Suite 200
Orange Village, Ohio 44122
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From: Subodh Chandra <subodh.chandra@chandralaw.com>

Sent: Monday, August 3, 2026 8:06 PM

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britopllc.com>; Larry Zukerman <lwz@zukerman-law.com>; Andrew Zashin <aaz@zashinlaw.com>; Emily Bohatch <emily.bohatch@chandralaw.com>

Subject: Re: Miller v. Moreno — important correspondence

[Quoted text hidden]

Miller v. Moreno — important correspondence

Subodh Chandra <subodh.chandra@chandraLaw.com>

Tue, Aug 4, 2026 at 3:39 PM

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britoplpc.com>, Larry Zukerman <l wz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandraLaw.com>

Dear Mr. Minc:

First, you must be familiar with the old lawyer's adage about what it is to "assume." "Assuming" is what got Congressman Miller into this whole UPEPA mess to begin with, when Ms. Moreno had nothing to do with *The Daily Mail* piece. To be clear, no one on Ms. Moreno's legal teams disclosed my correspondence to you before it was published on social media. I woke up on Pacific Time to that surprise. For all we know, Miller or someone on his team disclosed the letter to try to get ahead of what they all had to know were the forthcoming court filings seeking to hold him accountable for the misdeeds. (Even if we had disclosed the letter, there is nothing false about it, and it is protected speech on a matter of public concern and subject to litigation privilege.) Please refrain from making accusations about "leaks" with no evidence about who the alleged source is. That's just reckless.

Second, our letter to you plainly states:

At least one of those images *could be considered* Child Sexual Abuse Material (CSAM) because the daughter's genitals *appear* to be visible. The photo was in a document entitled EX-306_OFW-Messages-Feb-1-to-25-2026-with-Attachments and labeled IMG_9158 in the bottom-right corner.

(Emphases added.)

These are true statements and statements of opinion. The nude image at issue, labeled IMG_9158, indeed appears to show what we noted in our letter. The topless photo to which you appear to be diverting attention is IMG_8999. Please don't change the subject. In your initial responses to my letter, you did not deny that IMG_9158 is potential CSAM, and appears to reveal genitalia. Instead, you seemed to apologize.

Third, in either case, your accusations in the media that we are lying about the contents of the photos you shared are false. Please take steps to correct the record.

Fourth, you are speaking out of both sides of your mouth. You publicly claim to be apologizing to Ms. Moreno and her family, yet then proceed to evade pointed, specific questions about how it occurred *and what steps you are taking to rectify the situation*, and then add insult to injury by accusing us of lying about the main image at issue. What are you doing to audit who accessed that folder before you took it down and who obtained those images? We need answers to all of our questions.

Fifth, many of your explanations and diversions in your responses make no sense. What difference does it make that some unknown person restored a folder at 11:13 am on Sunday 8/2 when you release the folder containing the images at 10:30 am? We would appreciate a full explanation for how you acquired the problematic images, why they were in a public Dropbox file, and why you enabled your client to distribute them to hundreds of thousands of people.

Sixth, with Miller's announcement today that he's asking the House Ethics Committee for an investigation, could you please assure our client through us that you and your client will provide to Congress no images of their child nude or half-nude?

Finally, while we appreciate your efforts to divert responsibility from your client, it is he who ultimately shared with hundreds of thousands of people a Dropbox file containing those images. Please cease blaming us for blunders occurring in his camp.

You are free to share this entire chain of correspondence with anyone you wish. This is our response to your baseless accusations.

Sincerely,

Mr. Subodh Chandra (he/him)

T H E
CHANDRA
L A W F I R M L L C

Berkeley | San Diego | Cleveland | Santa Fe | Reno

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Bluesky: @subodhchandra.bsky.social/ and @chandraLaw.bsky.social • Twitter:

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Your case is our cause.®



This email may contain privileged or confidential information. If it wasn't for you, then please delete it and let us know.

[Quoted text hidden]



Emily Bohatch <emily.bohatch@chandraLaw.com>

Miller v. Moreno — important correspondence

Aaron Minc <Aminc@minclaw.com>

Tue, Aug 4, 2026 at 4:22 PM

To: Subodh Chandra <subodh.chandra@chandraLaw.com>

Cc: Alejandro Brito <abrito@britoplcc.com>, Larry Zukerman <l wz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandraLaw.com>

Mr. Chandra,

Federally, for an image to constitute child pornography/CSAM under 18 U.S.C. § 2256, it would mean it depicts:

- sexual activity;
- masturbation;
- sadistic or masochistic abuse; or
- a lascivious exhibition of the anus, genitals, or pubic area.

Please explain to me, right now, what knowledge you have and relied on when you leaked that letter to the press that the photos attached to that exhibit “could be considered” CSAM.

Keep in mind, this photo was taken by your own client and shared over a court-sanctioned communications platform.

Thank you.

Aaron Minc

Attorney & CEO

Defamation Removal Law
Online Reputation &
Brand Protection LawyersAminc@MincLaw.com**Main:** (216) 373-7706**Cell:** (330) 703-0214**Fax:** (440) 792-5327

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From: Subodh Chandra <subodh.chandra@chandraLaw.com>**Date:** Tuesday, August 4, 2026 at 3:39 PM

[Quoted text hidden]

[Quoted text hidden]



Emily Bohatch <emily.bohatch@chandraLaw.com>

Miller v. Moreno — important correspondence

Subodh Chandra <subodh.chandra@chandraLaw.com>

Tue, Aug 4, 2026 at 5:15 PM

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britoplpc.com>, Larry Zukerman <l wz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandraLaw.com>

Dear Mr. Minc:

First, again, as my last correspondence made clear, we did not provide the letter to the press before it appeared in social media this morning.

Second, we are not going to debate with you whether the image "could be considered" CSAM. Our view is that it could. If your position has now *shifted* to proclaiming that sharing with the public an image appearing to include our clients' child's genitalia is just fine, then that would be most unfortunate.

The bottom line is that you and your client published these photos—and you admitted that you shouldn't have. And you persist in refusing to answer questions about how this happened and what you are doing to mitigate the damage caused by your and your client's publication of these photos. You are now focused on yourself rather than the child you have harmed.

Please provide the requested information. Absent your communicating in a constructive rather than adversarial and self-serving manner, we are done communicating with you about this topic.

Sincerely,

Mr. Subodh Chandra (he/him)

THE

CHANDRA

LAW FIRM LLC

Berkeley | San Diego | Cleveland | Santa Fe | Reno

888.500.5025, ext. 101 office

Subodh.Chandra@ChandraLaw.com

www.ChandraLaw.comBiography: <https://www.chandraLaw.com/about/meet-the-team/subodh-chandra>

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Your case is our cause.®



This email may contain privileged or confidential information. If it wasn't for you, then please delete it and let us know.

[Quoted text hidden]



Emily Bohatch <emily.bohatch@chandraalaw.com>

Miller v. Moreno — important correspondence

Aaron Minc <Aminc@minclaw.com>

Tue, Aug 4, 2026 at 5:35 PM

To: Subodh Chandra <subodh.chandra@chandraalaw.com>

Cc: Alejandro Brito <abrito@britoplac.com>, Larry Zukerman <lwz@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandraalaw.com>, "Sansalone, Monica" <msansalone@gallaghersharp.com>

Thanks for the response.

I am extremely disappointed that you are refusing to do the professional thing and take any action to remediate the harm you've caused (with the help of some "anonymous person"), accusing me of possessing and transmitting CSAM. You are well aware that the allegation is false. Your own client created the material. These are innocent photos of a two-year-old. You've likely caused more attention and harm through this leak than my mistake ever would have. Shame on you.

All three of you, individually, and your clients are hereby officially on notice to preserve all documents and information related to this incident. If anything is deleted, it may result in sanctions, including, but not limited to, monetary penalties, fines, and adverse inferences.

And do put your liability carriers on notice of an imminent pending claim.

Regards,

Aaron Minc

Attorney & CEO

Defamation Removal Law
Online Reputation &
Brand Protection LawyersAminc@Minclaw.com**Main:** (216) 373-7706**Cell:** (330) 703-0214**Fax:** (440) 792-5327

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From: Subodh Chandra <subodh.chandra@chandraalaw.com>**Date:** Tuesday, August 4, 2026 at 5:16 PM

[Quoted text hidden]

[Quoted text hidden]



Emily Bohatch <emily.bohatch@chandrafirm.com>

Miller v. Moreno — important correspondence

Subodh Chandra <subodh.chandra@chandrafirm.com>

Wed, Aug 5, 2026 at 4:24

To: Aaron Minc <Aminc@minclaw.com>

Cc: Alejandro Brito <abrito@britopllc.com>, Larry Zukerman <lzw@zukerman-law.com>, Andrew Zashin <aaz@zashinlaw.com>, Emily Bohatch <emily.bohatch@chandrafirm.com>, "Sansalone, Monica" <msansalone@gallaghersharp.com>

Dear Mr. Minc:

Before you act impulsively and self-servingly to deflect from your own blunder, you should put your own insurance carrier and independent, competent counsel on notice about your own and your client's conduct, and carefully consider Ohio Revised Code §§ 2307.60(A) and the prohibition in § 2907.323(A)(1), among other sources:

(A) No person shall do any of the following:

(1) Photograph any minor or impaired person who is not the person's child or ward in a state of nudity, or create, direct, produce, or **transfer any material or performance that shows the minor or impaired person in a state of nudity, unless both of the following apply:**

(a) The material or performance is, or is to be, sold, disseminated, displayed, possessed, controlled, brought or caused to be brought into this state, or presented for a bona fide artistic, medical, scientific, educational, religious, governmental, judicial, or other proper purpose, by or to a physician, psychologist, sociologist, scientist, teacher, person pursuing bona fide studies or research, librarian, member of the clergy, prosecutor, judge, or other person having a proper interest in the material or performance;

(b) The minor's or impaired person's parents, guardian, or custodian consents in writing to the photographing of the minor or impaired person, to the use of the minor or impaired person in the material or performance, or to the transfer of the material and to the specific manner in which the material or performance is to be used.

(Emphasis added.) Neither exception applies. Ohio courts recognize this statute as covering CSAM. Also consider Ohio's complicity statute (R.C. 2923.03(A)) in relation to R.C. 2307.60(A).

We have had experience with CSAM and nude-image cases both federally and in Ohio, and are familiar with law enforcement's view of nude photos of minors. So we have a sound basis for believing that the transfer and dissemination of the child's nude photograph to hundreds of thousands of people is improper.

Unfortunately, you've refused to offer data or details about the breadth of the harm caused by disclosure or your plan to remedy it. We again ask on our client's behalf that you please respond to our various detailed questions about how exactly this happened, what the audit trail is for those who accessed the images, and *what efforts if any you are undertaking to mitigate the harm*. We don't understand why you apparently aren't making any effort in that regard. Deflection serves no purpose and will be ineffective. And trying to turn your own conduct around and implicitly threaten our client about a photo she did not disseminate outside of judicial and governmental purposes is beyond the pale.

We recognize that we are all just trying to do what we believe to be our jobs for our respective clients under challenging circumstances. But if you continue to accuse lawyers of conduct for which you have no evidence (because there is **none—it didn't happen**), and overpersonalize this litigation, you can expect the consequences.

Sincerely,

Mr. Subodh Chandra (he/him)

THE

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On Tue, Aug 4, 2026 at 2:36 PM Aaron Minc <Aminc@minclaw.com> wrote:

Exhibit 3 is a flash drive containing a video of Miller's August 2, 2026 livestream on his X.com account and will be filed manually.

← **Post**



Max Miller 
@MaxMillerOH



Here is a Dropbox with all the records I referenced today. I invite everyone who is interested to take a look.

dropbox.com/scl/fo/982qz09...

10:23 AM · Aug 2, 2026 · **234K** Views

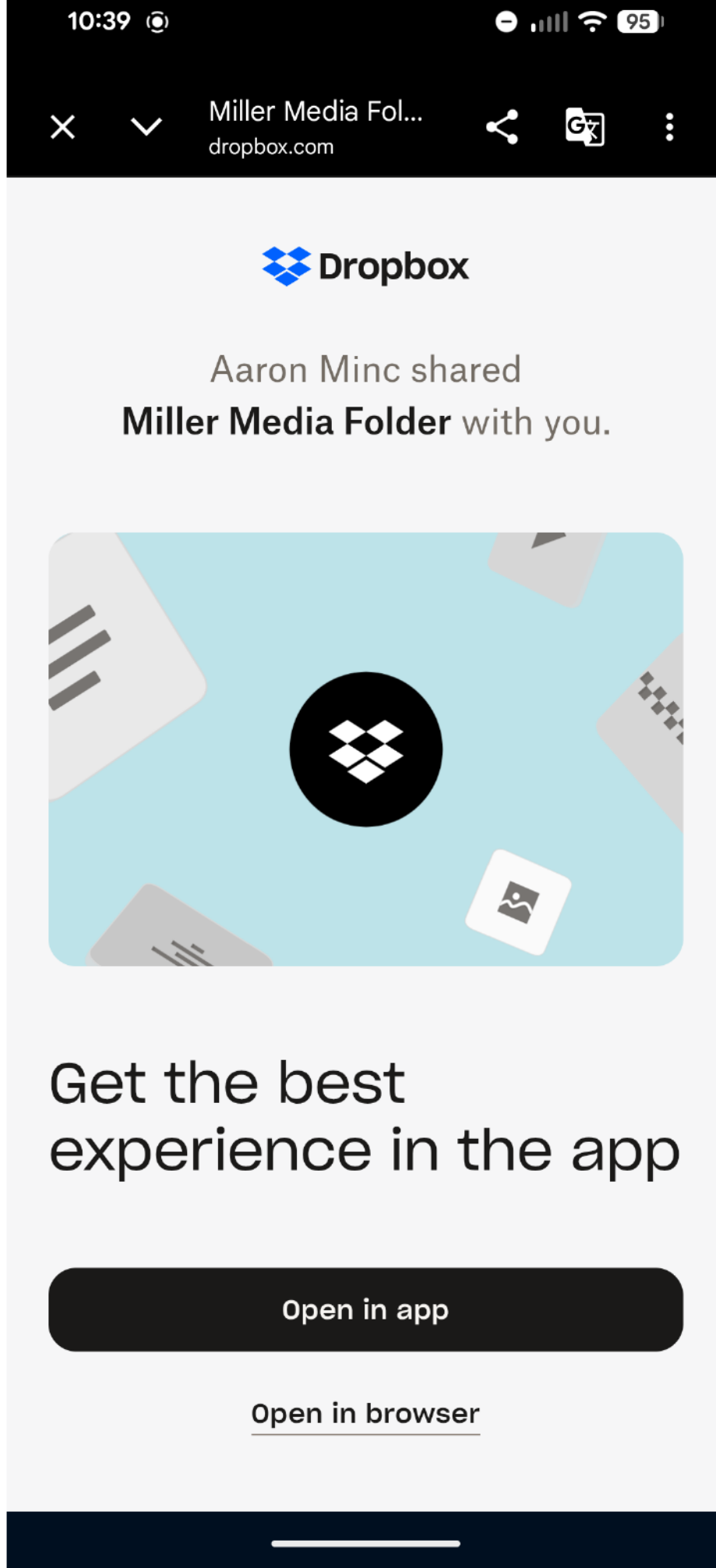
 205

 14

 50

 59





← **Post**



Max Miller ✓
@MaxMillerOH



Just to be clear: these documents were produced by my personal attorneys and paid for by me directly.

11:00 AM · Aug 2, 2026 · **62.3K** Views

💬 207

↻ 8

❤️ 48

🔖 14



EXHIBIT
6

← **Post**



Max Miller ✓

@MaxMillerOH



Apparently, there are people who don't want this information out. Strange. Don't worry, Dropbox will be back up momentarily.



Max Miller ✓ @MaxMillerOH · Aug 2

Here is a Dropbox with all the records I referenced today. I invite everyone who is interested to take a look.

dropbox.com/scl/fo/982qz09...

11:12 AM · Aug 2, 2026 · **274.7K** Views

💬 174

↻ 5

❤️ 49

🔖 21



EXHIBIT
7

← **Post**



Max Miller ✓

@MaxMillerOH



Dropbox back online. Take a look.
dropbox.com/scl/fo/982qz09...



Max Miller ✓ @MaxMillerOH · Aug 2

Apparently, there are people who don't want this information out. Strange.
Don't worry, Dropbox will be back up momentarily.

11:32 AM · Aug 2, 2026 · **186.8K** Views

304

9

38

36



EXHIBIT

8

August 3, 2026

Via email to Aminc@minclaw.com

Aaron Minc, Esq.
Minc Law
200 Park Ave. Suite 200
Cleveland, OH 44122

Re: *Miller v. Moreno*, Cuyahoga County Case No. CV-26-138810

Dear Mr. Minc:

Yesterday, you enabled your client, Congressman Max Miller, to share and disseminate to the public an electronic Dropbox folder of materials. This was in conjunction with a video rant about our client, Emily Moreno, that Miller posted on X.

The first time Miller shared the folder, it contained private images of Miller and Ms. Moreno's daughter and left her name unredacted. At least one of those images could be considered Child Sexual Abuse Material (CSAM) because the daughter's genitals appear to be visible. The photo was in a document entitled EX-306_OFW-Messages-Feb-1-to-25-2026-with-Attachments and labeled IMG_9158 in the bottom-right corner. The post with the link to the folder—published under your name—garnered over **204,000 views** from the time it was posted until this afternoon.

We write to demand an explanation about how this occurred.

- (1) Whose idea was it to share this intimate image of the child?
- (2) Why did your firm share it?
- (3) Did you or your firm vet the images before sharing them? Did anyone? Who?
- (4) Who removed the images from the second folder and why? Was it because someone realized that it was ill-advised (and in the case of the potential CSAM image, illegal) to share these images with the world?
- (5) How many people accessed and downloaded the intimate image, and each of the other images of the child, including one in which her chest is exposed?
- (6) Who accessed and downloaded the image?
- (7) What are you going to do about this?

We view this matter with the utmost seriousness and hope you and your client do as well. Please respond by the close of business on **August 5, 2026**. Honest responses should not take long.

Sincerely,



Subodh Chandra

EXHIBIT
9

Cc: Alejandro Brito, Esq.
Larry Zuckerman, Esq.
Andrew Zashin, Esq.

Max Miller's lawyer admits to accidentally releasing 'private images' of daughter

Lawyers for ex-wife Emily Moreno said possible "Child Sexual Abuse Material" was included in a trove of documents the Ohio lawmaker publicly posted.

By **MIA MCCARTHY** and **RILEY ROGERSON**

08/04/2026, 10:23AM ET

UPDATED: 08/04/2026, 11:37AM ET



A lawyer for Rep. Max Miller took responsibility Tuesday for inadvertently releasing sensitive photos of the Ohio Republican's daughter in a trove of material Miller published Sunday in a bid to defend himself against [domestic abuse claims](#).

The attorney, Aaron Minc, took responsibility for the photo being released and called it "completely unintentional and a mistake" after a lawyer for Miller's ex-wife, Emily Moreno, accused Miller of disseminating the daughter's name and one image that "could be considered Child Sexual Abuse Material."

"I am solely responsible for what happened," Minc said in a statement. "I was the only person responsible for assembling, creating, reviewing, adding, deleting, redacting, or making any changes to the information and files that were in this folder."

EXHIBIT
10

Minc apologized to Miller, Moreno and their families but also decried Moreno for creating “a media spectacle regarding this unfortunate mistake ... as a means to try to gain leverage in court and distract from the underlying evidence that exonerates Mr. Miller from the false allegations he is accused of.”

Miller posted the documents online Sunday after delivering a livestreamed defense against the claims leveled by his former wife, Emily Moreno. He has declined [all allegations of wrongdoing](#), which include pouring hot water on his ex-wife, holding a gun to her head and breaking his daughter’s collarbone.

Moreno’s lawyer Subodh Chandra claimed that some documents published to Dropbox left the daughter’s name unredacted and contained “private images,” including one where “the daughter’s genitals appear to be visible,” according to a [letter to Minc](#) obtained by POLITICO. Chandra noted that the photo was later removed.

“The post with the link to the folder — published under your name — garnered over 204,000 views from the time it was posted until this afternoon,” Chandra wrote.

The letter from Chandra asks Minc, “Whose idea was it to share this intimate image of the child?” among other questions, giving a Wednesday close-of-business deadline.

Minc disputed Chandra’s characterization of the photo: “There were no images of ‘genitals,’” he told POLITICO. “A two-year-old girl had her shirt off. That is a deliberately false, sensationalized, and disgusting characterization.”

The Dropbox dispute marks the latest escalation in the legal battle between Miller and Moreno, who is the daughter of Ohio Sen. Bernie Moreno. After Miller delivered his livestreamed defense Sunday, the GOP senator denounced his former son-in-law, saying he [should not serve in the House](#) and needs to seek professional help.

Bernie Moreno rekindled his attacks on Miller Monday after the photo revelations.

“When he went out and did what he did — including releasing photos of my granddaughter completely naked, that now you have hundreds of thousands of psychotic human beings that have that — and to say ‘oops’ is grotesque,” the senator told reporters. “My personal opinion is that this is a felony, and that every single human being that touched that photo and transmitted it electronically should go to jail because it is illegal to do that.”

Miller is running for reelection in a competitive Cleveland-area seat. He has until Wednesday to withdraw from the ballot and allow for a crash primary to replace him.

Lead Art: Rep.-elect Max Miller (R-Ohio) arrives for new member orientation check-in and program registration with Emily Moreno in Washington, Nov. 13, 2022. | Amanda Andrade-Rhoades/AP