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18 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
19 COUNTY OF LOS ANGELES - UNLIMITED JURISDICTION

20 JANE DOE,

21 Plaintiff,

22 v.

23 CHURCH OF SCIENTOLOGY
INTERNATIONAL; RELIGIOUS
24 TECHNOLOGY CENTER, and DAVID
MISCAVIGE; and DOES 1 – 25;

25 Defendants.
26

Case No.: 19STCV21210

COMPLAINT FOR DAMAGES

1. FALSE IMPRISONMENT
2. KIDNAPPING
3. STALKING IN VIOLATION OF CAL. CIV. CODE § 1708.7
4. LIBEL IN VIOLATION OF CAL. CIV. CODE § 45, et. seq.
5. SLANDER IN VIOLATION OF CAL. CIV. CODE § 46
6. CONSTRUCTIVE INVASION OF

27 ¹ This address is solely for delivery purposes. It does not indicate support for any lawsuit or case by the
28 University of Pennsylvania.

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- PRIVACY IN VIOLATION OF CAL. CIV. CODE § 1708.8
- 7. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
- 8. HUMAN TRAFFICKING IN VIOLATION OF CAL. CIV. CODE § 52.5
- 9. FAILURE TO PAY MINIMUM WAGE, EXCEEDING MAXIMUM WORK HOURS, AND OVERTIME
- 10. FAILURE TO PROVIDE DAYS OF REST AND MEAL AND REST PERIODS
- 11. VIOLATION OF CA. LAB. CODE §§ 203, 205, and 226
- 12. FRAUDULENT INDUCEMENT OF EMPLOYMENT IN VIOLATION OF CA. LAB. CODE § 970
- 13. NEGLIGENCE MISREPRESENTATION
- 14. NEGLIGENCE

JURY TRIAL DEMANDED

1 **COMPLAINT FOR DAMAGES**

2 Plaintiff, Jane Doe, hereby submits her Complaint against Defendants, The Church of
3 Scientology International (“CSI”); Religious Technology Center (“RTC”);
4 David Miscavige, and DOES 1 through 25, and alleges as follows:
5

6 **PARTIES**

7 1. Plaintiff, Jane Doe, is an adult female whose name and address are not contained
8 in this Complaint so as to protect her privacy and identity as she incurred injuries and damages of
9 a sensitive nature as a result of the negligent and intentional acts of Defendants outlined below.
10 Information which could identify Jane Doe is not contained herein. Plaintiff may be contacted
11 through her counsel as outlined herein. There exists good cause for Plaintiff to use a pseudonym
12 due to the harmful effect of the public disclosure of her identity and the harm inflicted by the
13 Defendants to Jane Doe. Plaintiff’s undersigned counsel will provide the identity of Plaintiff to all
14 Defendants. As such, Defendants suffer no prejudice as a result of concealing her identity in the
15 Complaint and Verifications.
16

17 2. Defendant, CSI, is and at all relevant times mentioned herein a non-profit
18 corporation organized under the laws of California. At all relevant times mentioned herein, CSI’s
19 primary place of business is in Los Angeles, California. At all times relevant hereto, CSI
20 headquarters is located at 6331 Hollywood Boulevard, Los Angeles, California 90028.
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22 3. Defendant, Religious Technology Center (“RTC”), is and at all relevant times
23 mentioned herein was a non-profit corporation organized under the laws of California. At all
24 relevant times mentioned herein, RTC’s primary place of business is in Los Angeles, California.
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26 4. At all times relevant hereto, RTC headquarters is located at 1710 Ivar Avenue,
27 Suite 1100, Los Angeles, California 90028, with a main office located at 19625 Highway 79,
28 Gilman Hot Springs, California 92383.

1 5. Defendant, David Miscavige, is and at all relevant times mentioned herein is
2 believed to be a resident of Los Angeles, California. Mr. Miscavige is the Chairman of the Board
3 (“COB”) of the Religious Technology Center, and the de facto leader of all aspects of CSI. At all
4 times relevant hereto, Mr. Miscavige is believed to reside at 6331 Hollywood Boulevard, Suite
5 1100, Los Angeles, California 90028.
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7 6. At all relevant times hereto, CSI has acted through its employees, members,
8 servants, and respective agents. At all times relevant hereto, Defendant DOES 1 through 25,
9 inclusive, were the agents, servants, employees, representatives, contractors and/or subcontractors
10 of Defendants CSI, RTC, and Mr. Miscavige, and/or employers working for Defendants CSI,
11 RTC, and Mr. Miscavige, and in doing the things herein alleged, were acting within the course
12 and scope and purpose of their authority as such agents, servants, employees, representatives,
13 contractors and/or subcontractors, and with the permission and consent of their employer and
14 Defendants CSI, RTC, and Mr. Miscavige. The true names and capacities, whether individual,
15 corporate, associate or otherwise, of Defendants DOES 1 through 25, inclusive, are unknown to
16 Plaintiff, who therefore sues said Defendants by said fictitious names.
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18 **JURISDICTION AND VENUE**

19 7. The Court has jurisdiction over this action pursuant to California *Code of Civil*
20 *Procedure* § 410.10. Plaintiffs seek damages under the statutory and common law of the State of
21 California.
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23 8. Venue is proper in this Court pursuant to California *Code of Civil Procedure* § 395
24 because (a) some of the acts and transactions described herein occurred within this county; (b)
25 Defendants are or were registered to do business in the State of California and/or were doing
26 business within this county; and (c) because Defendants did do business in this county by
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1 operating and/or exercising complete control over the operations of The Church of Scientology
2 International.

3 9. At all times relevant hereto, Defendants DOES 1 through 25, inclusive, were either
4 residents of the State of California, doing business in the County of Los Angeles, and/or are
5 otherwise subject to the jurisdiction of the State of California.
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7 **FACTUAL HISTORY**

8 **(Background of Scientology)**

9 10. For more than sixty years, The Church of Scientology (“CSI”) has lured thousands
10 of unsuspecting but well-intentioned individuals into its corporation.²

11 11. CSI is the “Mother Church” of Scientology. It directs the activities of all other
12 Scientology corporations and entities around the world. It collects a percentage of the income of
13 all other Scientology organizations and has accumulated in excess of a billion dollars in this
14 fashion.
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16 12. Religious Technology Center (“RTC”) owns all Scientology trademarks and
17 service marks and controls their licensing and use. It possesses the ultimate ecclesiastical
18 authority over the international hierarchy.

19 13. “Scientology” was created by L. Ron Hubbard in 1952 following the publication
20 of “Dianetics: The Modern Science of Mental Health” in 1950. Its principles are based entirely
21 upon the writings, thoughts, and teachings of Mr. Hubbard. These writings were not embraced by
22 the academic or professional psychological community, which angered Hubbard.
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26 ² For purposes of this pleading, use of the term “Church of Scientology” or “Scientology” includes Religious
27 Technology Center (RTC), Church of Scientology International (CSI) and all subordinate and affiliated scientology
28 organizations.

1 14. For those following “Scientology,” the writings of L. Ron Hubbard must be strictly
2 practiced, and followed in a fundamentalist, orthodox manner with strict adherence to the
3 policies, procedures, and practices as written and dictated by L. Ron Hubbard.

4 15. Scientology started as a psychological theory but Mr. Hubbard later decided to
5 convert it into a religious entity to gain tax exempt status.

6 16. L. Ron Hubbard passed away on January 24, 1986. After pressure on the federal
7 government, the IRS awarded the “Church of Scientology” and all affiliated organizations and
8 corporations tax-exempt status as a religious entity on October 8, 1993.

9 17. The Church of Scientology presents a façade to the outside world to disguise what
10 in reality is nothing more than a cult built on mind control and destruction of the independence
11 and self-control of those drawn into its sphere. Scientology and its leaders use religious rhetoric to
12 lure trusting and unsuspecting individuals seeking to better themselves into its corporations. Once
13 in CSI, members are isolated from the outside world, their access to information is heavily
14 monitored and controlled, and they are subject to physical, verbal, psychological, emotional
15 and/or sexual abuse and/or assault. Their assets are also targeted by CSI, which calibrates its
16 member services according to the wealth of each member.

17 18. Upon Mr. Hubbard’s death, David Miscavige assumed complete and unfettered
18 control over CSI and all of its members. Mr. Miscavige’s official title is “Chairman of the Board
19 of the Religious Technology Center.” Mr. Miscavige refers to himself as the “Pope of
20 Scientology,” and wields absolute and unfettered control over all operations and members. It is
21 known to all within CSI that everything of import must be approved by Mr. Miscavige, and that
22 Mr. Miscavige’s orders are unappealable and absolute.
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1 19. CSI’s website describes Mr. Miscavige’s role as responsible for “ensuring the
2 standard and pure application of Mr. Hubbard’s technologies of Dianetics and Scientology and for
3 Keeping Scientology Working.”³

4 20. To maintain order and obedience among the membership, CSI heavily restricts
5 members’ access to information. Members are discouraged and in many instances banned from
6 using the internet, and are forbidden from exploring other opinions about Scientology outside of
7 the writings of Mr. Hubbard.

8 21. There is a department within CSI known as the Office of Special Affairs (“OSA”).
9 OSA is supervised by Mr. Miscavige and tasked with attacking anyone who questions or criticizes
10 CSI and its affiliates, Mr. Hubbard, and/or Mr. Miscavige. OSA employs lawyers, investigators,
11 public relations personnel, and others who dedicate themselves to destroying anyone identified as
12 an attacker of CSI or Mr. Miscavige. CSI through OSA and its members utilizes what Mr.
13 Hubbard and CSI calls “Fair Game” tactics to attack, harass, embarrass, humiliate, destroy, and/or
14 injure individuals who CSI perceives as “enemies” or threatening to CSI.

15 22. CSI and OSA deem anyone who speaks out against Scientology in any manner a
16 “suppressive person.” Once deemed a “suppressive person” or an “enemy” of Scientology by CSI,
17 members of CSI are directed, by Miscavige and according to the written policies of Scientology,
18 to, deprive that individual of property, injure that person by any means, and/or destroy that
19 individual. It is specifically written in the policies that if a member of Scientology does any of the
20 above to a “suppressive person” and/or enemy, they will not be disciplined in any fashion by CSI.

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26 ³ *David Miscavige: A Biography*, Scientology (May 20, 2019, 11:49am), [https://www.scientology.org/david-](https://www.scientology.org/david-miscavige/biography.html)
27 [miscavige/biography.html](https://www.scientology.org/david-miscavige/biography.html).

1 **(Scientology’s Exploitative Business Practices)**

2 23. CSI is a multi-billion dollar corporation. It has acquired its tremendous wealth, in
3 part, by requiring members to purchasing their salvation on the “Bridge to Total Freedom.” This
4 is done by coercing members into paying for “auditing sessions” and “courses”—the only means
5 to achieve the ultimate and coveted status of “Clear” and “Operating Thetan” (“OT”).⁴
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7 24. The purported goal of all Scientologists is to achieve the state of Clear and
8 ultimately OT. Clear is defined as “a highly desirable state for the individual...a person who no
9 longer has his own reactive mind and therefore suffers none of the ill effects that the reactive
10 mind can cause.”⁵ Subsequently, the state of OT is defined as “a spiritual state of being above
11 Clear...an Operating Thetan, then, is one who can handle things without having to use a body of
12 physical means.”⁶
13

14 25. The process of becoming Clear and OT is a path known within Scientology as
15 “The Bridge to Total Freedom” a metaphor for the Scientologists advancement in the religion.

16 26. To achieve these statuses a member must be “audited” repeatedly, and frequently,
17 and must take required “courses”, all at a cost to the individual member. Each “course” has
18 accompanying materials, which are all copyrighted and owned by CSI.

19 27. The “auditing” process is based on scientologist’s belief that we are all immortal
20 and possess two “minds”—the “reactive mind” and the “analytical mind.” The “reactive mind” is
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24 ⁴ Scientology “auditing” is a term used to describe all forms of scientology counseling. The E-meter is also used for
25 “confessionals” or “security checks” – interrogations where intrusive and personal questions are asked to uncover
discreditable or embarrassing information or to discover if the person is a government or psychiatric “plant” or sent in
to the organization to do harm.

26 ⁵ *Glossary of Scientology & Dianetics Terms*, What Is Scientology? (June 5, 2019),
27 <http://www.whatisscientology.org/html/Part14/Chp50/pg1019-a.html>.

28 ⁶ *What Is Meant By Operating Thetan (OT)?*, Scientology (June 17, 2019),
<https://www.scientology.org/faq/operating-thetan/what-is-ot.html>.

1 where trauma and pain from all lives, past and current, resides. The “analytical mind” is the
2 conscious mind.

3 28. Per Mr. Hubbard’s teachings, the “reactive mind” is responsible for anything and
4 everything negative that occurs in a Scientologist’s life. In Mr. Hubbard’s publication “Dianetics:
5 The Modern Science of Mental Health,” he writes:

6 “What can it do? It can give a man arthritis, bursitis, asthma, allergies, sinusitis,
7 coronary trouble, high blood pressure and so on, down the whole catalog of
8 psychosomatic ills, adding a few more which were never specifically classified as
9 psychosomatic, such as the common cold.”⁷

10 29. To achieve the state of “clear” one must rid themselves of their “reactive mind.”
11 This can only be done through the “auditing” process. “Auditing” is defined as “[s]cientology
12 counseling...a very unique form of personal counseling which helps an individual look at his own
13 existence and improves his ability to confront what he is and where he is.”⁸

14 30. In practice, an “auditing” session involves a member meeting with an “auditor,”
15 who is a specially trained Scientologist. The “auditor” will hook the member up to the “e-meter.”
16 An “e-meter,” pictured below, is also known as an electropsychometer, and is “a religious
17 artifact...it measures the mental state or change of state of a person and thus is of benefit to the
18 auditor...locate areas to be handled.”⁹ It attempts to work similarly to a lie detector. Where the
19 person being audited is hooked up to the machine and holds two metal conductors commonly
20 referred to as “cans.” The “e-meter” then claims to record physical reactions that are conveyed to
21 the “auditor” by reading the needles. These reactions are accessing the “reactive mind.”
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25 ⁷ L. Ron Hubbard, DIANETICS: THE MODERN SCIENCE OF MENTAL HEALTH (1950).

26 ⁸ *Glossary of Scientology & Dianetics Terms*, What Is Scientology? (June 5, 2019),
27 <http://www.whatisscientology.org/html/Part14/Chp50/pg1018.html#auditing>.

28 ⁹ *Glossary of Scientology & Dianetics Terms*, What Is Scientology? (June 5, 2019),
<http://www.whatisscientology.org/html/Part14/Chp50/pg1020-a.html>.

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31. The “e-meter” was created and patented by Mr. Hubbard. It has been the subject of extensive litigation and controversy. The Federal Food and Drug Administration (“FDA”) has investigated the e-meter for false and misleading claims regarding its use and efficacy. As a result, all e-meters are now required to include a warning to consumers that it is “...not medically or scientifically capable of improving the health or bodily functions of anyone.”¹⁰

32. This warning is the result of litigation stemming from the FDA investigation. In his decision regarding the e-meter, Federal District Court Judge Gerhard Alden Gesell stated:

Hubbard and his fellow Scientologists developed the notion of using an E-meter to aid auditing. Substantial fees were charged for the meter and for auditing sessions using the meter. They repeatedly and explicitly represented that such auditing effectuated cures of many physical and mental illnesses. An individual processed with the aid of the E-meter was said to reach the intended goal of “clear” and was led to believe there was reliable scientific proof that once cleared many, indeed most illnesses would automatically be cured. Auditing was guaranteed to be successful. All this was and is false-in short, a fraud. Contrary to representations made, there is absolutely no scientific or medical basis in fact for the claimed cures attributed to E-meter auditing.¹¹

33. E-meters and auditing remain an essential part of CSI and its business practices. Individual members must purchase extensive “auditing” sessions and courses. The cost of this

¹⁰ *U.S. v. Article or Device... “Hubbard Electrometer,”* 333 F. Supp. 357, 364 (D.D.C. 1971).

¹¹ *Id.* at 359.

1 process is reflected on a predetermined price list and must be paid for up front regardless of
2 whether the individual receives the services.

3 34. During these “auditing” sessions the “auditor” takes copious notes on what the
4 individual reports is the subject of his or her anxieties. These notes are then placed in a folder and
5 maintained by CSI. Should anyone ever question Mr. Hubbard’s teachings or criticize
6 Scientology in any manner, the individual may find themselves back at the beginning of the
7 “Bridge to Total Freedom.”
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9 35. Even if a member reaches the status of “clear,” they are not done paying. Once a
10 member becomes “clear,” they are then offered the “advanced courses” known as the “Operating
11 Thetan” or “OT” levels. These levels go on infinitely.
12

13 36. This process is coercive, and manipulative. While the cost of going up the “Bridge
14 to Total Freedom” varies by individual, it is estimated that CSI earns \$125 million annually from
15 the sale of “auditing” services and the like.¹²

16 37. CSI subjects all members to this extensive and expensive process regardless of
17 their age. This includes children of any age.
18

19 **(Child Abuse in Scientology)**

20 38. Child sexual abuse and the exploitation of children is an epidemic. According to
21 the National Sexual Violence Resource Center, 1 in 4 girls and 1 in 6 boys are sexually abused in
22 the United States. This abuse is particularly apparent in the context of religious institutions.¹³

23 39. Religious institutions have experienced serious problems with child abuse and the
24 sexual exploitation of children. CSI is no exception. CSI’s aggressive practices and rules forcing
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26 ¹² *How Much Does Scientology Pocket From Its Tax Exempt Status?*, Fortune (June 5, 2019),
<http://fortune.com/2015/04/08/scientology-tax-exempt/>

27 ¹³ National Sexual Violence Resource Center, <https://www.nsvrc.org/node/4737>.

1 secrecy upon all members have kept victims from coming forward even longer than abuse victims
2 in other religious institutions such as the Catholic Church or the Jehovah's Witnesses.

3 40. Mr. Hubbard and CSI believe we are all immortal and reincarnated therefore,
4 children are treated as though they are adults in the body of a child.

5 41. It is common practice in CSI to separate children from their parents. In doing so,
6 CSI assumes the responsibility of in loco parentis.

7 42. Defendants are incredibly distrusting of law enforcement, and forbid members
8 from contacting police under any circumstance, even in the context of child sexual abuse.

9 43. This policy is born from, and reflected in Mr. Hubbard's publication entitled, "A
10 New Hope for Justice, in which" Mr. Hubbard preaches his distrust of law enforcement, and the
11 judicial system as a whole. That publication reads in part:

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14 Police and courts offer an open-armed opportunity to the vicious and corrupt to
15 establish themselves in a position of safety while satisfying their strange appetites
16 of perverted viciousness toward their fellow man...Justice systems thereby become
17 a sort of cancer which erode every splendid ambition and achievement of the
18 decent citizen..."Justice" apparently cannot be trusted in the hands of Man...Who
19 is Public Enemy #1 today? The FBI! Its obvious target is every opinion leader and
20 public-spirited group in America!¹⁴

21 44. Instead of reporting abuse to authorities, CSI instructs its membership that the only
22 answer to child abuse and any other crime is Scientology and the teachings of Mr. Hubbard. Thus,
23 even children who are brave enough to come forward are forbidden from contacting law
24 enforcement, nor are they treated as victims at all. Instead, they are led to believe that they have
25 done something wrong and must have done something to incite such abuse. Historically, the
26 outcome of a disclosure resulted in the child being forced to apologize to his or her abuser for the
27 child's "role" in their sexual abuse.

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¹⁴ L. Ron Hubbard, INTRODUCTION TO SCIENTOLOGY ETHICS (1972).

1 45. The policy that forbids members from contacting authorities is so strictly enforced
2 that phones within some CSI facilities are incapable of dialing 911.

3 46. This restriction against any involvement or contact with law enforcement is
4 particularly concerning given the treatment of children within CSI.

5 47. Children are subjected to the same auditing process as adults. Children are left
6 alone with adults who are auditing them. CSI also allows children to become auditors of adults.
7

8 48. Children who are auditors have been subjected to admissions made by adults about
9 explicit sex and in fact, child auditors are specifically trained to ask questions of adults about their
10 specific sexual activity during auditing sessions.

11 49. During auditing sessions, children have been asked to relate in great detail any
12 sexual experiences they may have had, including explicit details of masturbation.
13

14 **(Forced Labor Trafficking in Scientology)**

15 50. Human trafficking is a modern-day form of slavery involving victims who are
16 forced, defrauded, or coerced into sexual labor or labor exploitation.

17 51. CSI engages in the forced labor of adults and children. CSI is a multi-billion dollar
18 corporation built off the backs of men, women, and children who are forced to work 100 hour
19 weeks for far below the minimum wage.
20

21 52. CSI has removed children as young as 9 years old from their homes, asked to sign
22 employment contracts and put to work. Pregnant women have been coerced into terminating their
23 pregnancies to allow them to work longer and harder hours, as pregnancy is viewed as a
24 hinderance.

25 53. CSI makes effectively no contributions to Social Security for its employees nor
26 does it have employee pensions.
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1 54. Personal freedoms are restricted, families are separated, and severe punishments
2 are utilized to maintain complete control over the forced workers.

3 55. CSI has been the subject of litigation involving these practices. In July of 2018, on
4 the eve of trial, CSI settled a lawsuit that complained of CSI’s forced labor practices and coerced
5 termination of the plaintiff’s pregnancy, among other claims.¹⁵
6

7 **(“Disconnection” “Suppressive Persons” and “Potential Trouble Sources”)**

8 56. Although CSI’s website claims to allow any member the option to leave at any
9 time, this is far from the truth. In fact, many individuals are forced to flee. Some have resorted to
10 drastic measures to effectuate escape by hiding in trunks of cars or drinking bleach.

11 57. Once CSI members defect, they are excommunicated from CSI and treated as an
12 enemy of the church. As stated above. this person becomes known within CSI as a “Suppressive
13 Person” or an “SP,” who must be stopped. Throughout his writings, Mr. Hubbard has described
14 Suppressive Persons as “criminals” and “monsters.”
15

16 58. CSI defines an SP as “a person who possesses a distinct set of characteristics and
17 mental attitudes that cause him to suppress other people in his vicinity. This is the person whose
18 behavior is calculated to be disastrous.” In practice, this is anyone who speaks out against CSI in
19 any negative light, whether or not they are or ever were a member of CSI.¹⁶
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21 59. CSI identifies anyone who is in CSI and who is in contact with an SP as a
22 “Potential Trouble Source” or “PTS.” This term is defined as, “a person who is in some way
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26 ¹⁵ *DeCrescenzo v. Church of Scientology International*, No. BC411018, (Ca. Sup. Ct. 2018).

27 ¹⁶ *Glossary of Scientology & Dianetics*, What is Scientology?, (June 7, 2010),
28 <http://www.whatisscientology.org/html/Part14/Chp50/pg1024.html>

1 connected to and being adversely affected by a suppressive person. Such a person is called a
2 *potential* trouble source because he can be a lot of trouble to himself and to others.”¹⁷

3 60. Thus, any member of CSI who is related to, friends with, or an associate of an SP
4 must immediately disassociate from that person. This policy is known as “disconnection.”
5 Though CSI claims that this is the individual’s decision, failure to disconnect means that the
6 member will be declared a PTS—and ultimately an SP—themselves.
7

8 61. In practice, once an individual defects from Scientology, the family members and
9 friends who remain in CSI must completely and unwaveringly disassociate from them. This
10 means separation of parent and child, relatives from relatives, friends from friends, and divorce in
11 the instance of spouses.

12 62. To date, RTC’s website enumerates certain “suppressive acts.” For example, “any
13 person who is hypercritical of Scientology or the Church,” who “[p]ublicly depart[s]
14 Scientology,” or who makes “[p]ublic statements against Scientology or Scientologist” will be
15 guilty of suppressive acts.¹⁸
16

17 **(The Concept of “Fair Game”)**

18 63. Per CSI policy, an SP, or critic of Scientology, must be silenced by whatever
19 means necessary. Mr. Hubbard’s own written policies instruct members to damage the critic’s
20 professional reputation, file frivolous lawsuits, and harass and surveil “the enemy.” The policy of
21 destroying SPs is known within SCI as the “Fair Game Policy.”
22

23 64. A person who is declared an SP is “Fair Game” for relentless and cruel behavior.
24 A person who is Fair Game “[m]ay be deprived of property or injured by any means by any
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26 ¹⁷ *Glossary of Scientology & Dianetics*, What is Scientology?, (June 7, 2010),
<http://www.whatisscientology.org/html/Part14/Chp50/pg1023.html>.

27 ¹⁸ *Ethics*, Religious Technology Center, (June 7, 2019), <http://www.rtc.org/matters/ethics.html>.
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1 Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or
2 destroyed.”¹⁹

3 65. The writings of Mr. Hubbard, which are to be orthodoxly practiced, instruct the
4 Scientologists to “haunt” SPs through surveillance and the use of private investigators. Moreover,
5 information must be disseminated that will damage the SP’s professional and private reputation
6 regardless of the truth of the information disseminated. Mr. Hubbard’s edicts encourage and/or
7 instruct his followers to “ruin [the SP] utterly.”

9 66. Moreover, under Scientology’s written policy, it is fair game to threaten that which
10 an enemy seeks to protect; this includes friends and family of the enemy, even if those individuals
11 were never members of Scientology and/or had no affiliation with Scientology.

12 67. CSI claims publicly that the Fair Game Policy was canceled in 1968; however, it
13 remains in practice to this day. In fact, despite publicly canceling the policy in 1968, CSI, through
14 its attorneys, has acknowledged the existence, use and implementation in litigation decades
15 later.²⁰

17 68. CSI and the other Defendants named herein, conspired to subject Plaintiff named
18 herein to the Fair Game Policy by defaming Plaintiff, disseminating false information about
19 Plaintiff, and stalking and harassing Plaintiff, after she courageously spoke out about the abuse
20 she suffered while a member of CSI as a child.

21
22 **(Implementation of “Fair Game”)**

23 69. Defendants implement Fair Game in a variety of different ways all with the single
24 goal to destroy anyone whom they have deemed a “suppressive person” with the ultimate goal to
25 “utterly ruin” them.

26 ¹⁹ *Allard v. Church of Scientology*, 58 Cal. App. 3d 439 n.1 (Ct. App. 1976).

27 ²⁰ *Id.*; see also *Church of Scientology v. Wollersheim*, 42 Cal. App. 4th 628 (Ct. App. 1996).

1 70. Historically, to effectuate this destruction, Defendants have hired private
2 investigators to surveil, follow, video, and photograph their enemies. Defendants have rented
3 homes in close proximity to the perceived threat in order to place their “enemies” under around-
4 the-clock surveillance.

5 71. Defendants’ surveillance tactics know no limits or bounds. Subjects of Defendants’
6 fair gaming tactics have included: The United States Government, United States Attorneys,
7 Elected Officials, Judges, The Drug Enforcement Administration, The United States Coast Guard,
8 The American Medical Association, The National Institute of Mental Health, and innocent
9 individuals simply trying to live their lives.
10

11 72. Defendants have contacted prospective business partners, clients, or employers and
12 sabotaged employment opportunities.
13

14 73. Defendants have sought to embarrass and defame individuals who have spoken out
15 against Scientology’s abuses by disseminating false and inflammatory information. Defendants
16 have created dozens of websites dedicated to defaming, intimidating, and harassing those they call
17 “suppressive persons.”

18 74. Defendants have filed false and frivolous lawsuits.

19 75. Defendants have solicited estranged family members of alleged “suppressive
20 persons” to publicly insult and harass them.
21

22 76. Courts have repeatedly acknowledged the existence of this policy. CSI has a
23 “history of seeking retribution against its perceived enemies.”²¹

24
25 ²¹ *Church of Scientology of California v. Dep’t of State*, 493 F. Supp. 418, 420 (D.D.C. 1980) (citing *Church of*
26 *Scientology v. Bell*, supra, slip op at 4); see also *Wollersheim v. Church of Scientology*, 212 Cal. App. 3d 872, 880,
27 (Ct. App. 1989), cert. granted, judgment vacated sub nom. *Church of Scientology of California v. Wollersheim*, 499
28 U.S. 914 (1991) (“Scientology is a hierarchical organization which exhibits near paranoid attitudes toward certain
institutions and individuals—in particular, the government, mental health professions, disaffected members and
others who criticize the organization or its leadership. Evidence also was introduced detailing Scientology’s
retribution policy, sometimes called “fair game.”)

1
2 **(Jane Doe’s Background in Scientology)**

3 77. Plaintiff, Jane Doe, was born into Scientology in 1979 to Scientologist parents. Her
4 entire life was dictated and controlled by Scientology’s abusive policies, procedures and rules.
5 From 1985 until 1991, from ages 6 – 12, Jane Doe lived at the Church of Scientology’s Spiritual
6 Headquarters, or “Flag Base,” located at 210 S. Fort Harrison Ave, Clearwater, FL.
7

8 78. Jane Doe was a member of the “Cadet Org” which is a subdivision of CSI for the
9 children of Scientology’s most dedicated members. As a member of the “Cadet Org”, Plaintiff
10 was subjected to military-like conditions, which included a strict schedule of working and
11 cleaning from 8:00 A.M. until midnight. Jane Doe also attended “school” on the compound where
12 she was instructed on Scientology’s practices rather than being provided with the minimum
13 compulsory education required under state law. When Jane Doe began public school at 8-years-
14 old, she was two grades behind her peers.
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16 79. Jane Doe was subjected to constant “auditing”, described above, which is a
17 Scientology interrogation and indoctrination procedure. From a young age, she was questioned,
18 told what she could and could not say publicly about Scientology, and taught never to question
19 Scientology’s teachings and practices. Jane Doe was told that she could never go to the police
20 and/or any government agency, because they were the enemy of Scientology.
21

22 80. At approximately 10-years-old, Jane Doe was also subjected to “bullbaiting.”
23 Bullbaiting is a technique during which members, **including children**, are trained not to react to
24 harassment, verbal assault, threats, and/or sexually explicit and inappropriate comments, among
25 other things. During this process, adults would say vulgar and sexually explicit things to children
26 and punish them if they showed any visible reaction. Specifically, Plaintiff was forced, at the age
27 of 10-years-old, to sit in a chair while adults screamed things in her face such as, “I am going to
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1 fuck you and then your mother,” and “You are going to suck my dick.” If Plaintiff reacted in any
2 way to these offensive and outrageous statements, and there were many others, the entire process
3 of “bullbaiting” would start all over again. These actions fall squarely within California’s
4 definition of child abuse, and thus are in direct violation of Cal. Penal Code § 273(a).
5

6 81. Human trafficking is a modern-day form of slavery, involving victims who are
7 forced, defrauded, or coerced into sexual or labor exploitation. On or about 1994, Plaintiff
8 became the victim of human trafficking at the hands of Defendants. Under false promises of fair
9 pay and compliance with laws of the United States and California, humane treatment, and a
10 simple job, Defendants knowingly and willfully lured Plaintiff to Los Angeles, California.
11 Instead of fulfilling their false promises, Defendants subjected Plaintiff to involuntary servitude.
12 Immediately upon Plaintiff’s arrival to Los Angeles, California, Plaintiff was put to work and
13 subjected to long grueling workdays for inadequate pay.
14

15 82. Defendants forced Plaintiff to work from when she was 15 years old until she
16 escaped with virtually not a single day off. Defendants forced Plaintiff to begin work early in the
17 morning and work without breaks and/or legally mandated meals until late at night. The work
18 Plaintiff was required to perform was laborious and back-breaking.
19

20 83. Defendants verbally, physically, and psychologically restricted Plaintiff from
21 leaving the Gold Base (described below) at all times. Defendants frequently became angry with
22 Plaintiff, intimidating and humiliating her. Defendants saw to it that Plaintiff had little to no
23 contact with family or friends, including her husband, throughout her time at Gold Base.
24 Plaintiff’s isolation and dependency on Defendants as her sole source of security, survival and
25 human contact made her particularly vulnerable to their psychological abuse. Defendants meant
26 for their actions and behavior to intimidate and frighten Plaintiff into submission. Plaintiff
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1 suffered nightmares as a result of Defendants' intimidation. Defendants also heavily censored any
2 and all of Plaintiff's communication with relatives, friends, and the outside world.

3 84. In 1994, at age 15, Jane Doe became a member of the "Sea Org" and eventually
4 moved to CSI's Headquarters, or "Gold Base", located at 19712 Gilman Spring Road, San
5 Jacinto, CA. Jane Doe remained at the Gold Base for 12-13 years.

6
7 85. The Sea Org is the sub-organization for Scientology's most dedicated members,
8 and like the Cadet Org, is military-like in its operation. Members of the Sea Org sign a "billion-
9 year contract" dedicating their lives to serving Scientology. Members work an average of 100
10 hours per week, live in communal housing, and are given a nominal weekly allowance instead of
11 a paycheck. Children in the Sea Org were paid \$15 a week, while adults were paid \$46. The Sea
12 Org is a form of organized labor trafficking where members are forced into difficult labor
13 conditions and paid a small amount that makes it difficult for them to break free.

14
15 86. Sea Org members pledge to do whatever is necessary to achieve the "Aims of
16 Scientology" and are the most dedicated members of Scientology. Only Sea Org members are
17 allowed to work for CSI and RTC. The top of the international hierarchy of scientology is
18 exclusively staffed by Sea Org members who pride themselves in their ruthless commitment to
19 scientology and eradicating the forces of evil (SP's) that may stand in their way.

20
21 87. Through the Sea Org, Jane Doe began working closely with David Miscavige, the
22 leader of the Church of Scientology and became his steward. As steward, Jane Doe was with
23 Miscavige 7 days a week.

24 88. Jane Doe worked in close proximity to Defendant Miscavige on a daily basis for
25 years, learning information about his private life and marriage, and becoming close with his wife,
26 Shelly Miscavige. As a result of this, Jane Doe became more and more restricted from leaving
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1 “Gold Base”. Her interactions with others were limited by CSI and Miscavige due to her intimate
2 knowledge of David Miscavige.

3 89. In late Summer 2005, Miscavige became increasingly hostile and verbally abusive
4 towards his wife, Shelly Miscavige. Eventually, David Miscavige had Shelly removed from the
5 main office as his secretary/assistant in the Gold Base. Jane Doe, because of her connection to
6 Shelly Miscavige, at the age of 26, was punished by being removed from her position as steward
7 and forced into the “Hole.” The Hole is a set of double-wide trailers on Gold Base where senior
8 executives accused of “ethics violations” were held under strict surveillance. Jane Doe was
9 forbidden from having any communication whatsoever with Shelly Miscavige. Jane Doe spent
10 three months in the “Hole,” which is, in essence, solitary confinement before being forced to do
11 physical and manual labor.
12

13 90. Individuals sent to the Hole were completely cut off from the outside world;
14 internet access and cell phones were banned and identification such as passports were confiscated
15 and kept under lock and key. Jane Doe could not come and go as she pleased at Gold Base as
16 exits were manned by guards.
17

18 91. Approximately, six months after being placed in the “Hole,” while performing
19 hard labor, Jane Doe witnessed a dark-colored tinted vehicle pull up to the main building.
20 Thereafter, unidentified men dragged Shelly Miscavige, who was crying and visibly distraught,
21 out of the building and put her in the car. Shelly Miscavige has never been seen or heard from
22 again.
23

24 92. After Jane Doe completed her “sentence” of being placed in the “Hole” and
25 performing hard labor, she was sent to work on filming promotional videos for CSI.

26 93. Jane Doe hired non-Scientologist actors for the promotional videos and received
27 information from outside the Base through them. These actors were the only non-Scientologists
28

1 she was permitted to have contact with and they became her “life-line” to the world outside Gold
2 Base.

3 94. In 2016, Jane Doe submitted written requests to leave to her superiors seven times.
4 All requests were denied. Jane Doe was told by her superiors that if she left she would get cancer
5 and die. On one occasion, Jane Doe was physically restrained and prevented from leaving. As a
6 result of this, Jane Doe suffered mentally and contemplated suicide.
7

8 95. In November 2016, Jane Doe learned that filming would be moved off Gold Base
9 to a location where she would not have access to these non-Scientists, meaning she would
10 also lose access to the actors and her “life-line” to the outside world. She decided to make an
11 escape attempt and hid in the trunk of an actor’s car to leave Gold Base. She was then able to
12 reunite with her father.
13

14 96. The Church discovered that Jane Doe had escaped and got her mother and brother,
15 both active Scientology members, to threaten “disconnection” if she did not return. As described
16 above, “Disconnection” is CSI practice of severing all ties with someone deemed hostile to
17 Scientology.

18 97. Jane Doe’s father did not threaten Disconnection but did encourage Jane Doe to
19 return and complete CSI’s official exit procedure, known as “routing out.”
20

21 98. CSI assured Jane Doe it would take two, but no more than three, weeks to
22 complete the “routing out” process.

23 99. At the age of 37, Jane Doe returned to CSI to “route out,” in an effort to not lose
24 all connection with her family. Instead of doing what was agreed upon, CSI proceeded to treat
25 Jane Doe like a prisoner. Jane Doe was forced to do everything with the accompaniment of a
26 “handler,” including using the bathroom, showering, and sleeping. She was made to do
27 videotaped interrogations in which she was forced to make false confessions and provide false
28

1 positive testimonials about her experiences with CSI. Jane Doe was held for three months, not
2 three weeks as she was told. Jane Doe was rarely permitted to leave. During this time, Jane Doe’s
3 grandmother died, and she was not even allowed to leave for the funeral.

4 100. Jane Doe left the grip of Scientology finally in 2017 and soon thereafter began
5 working for Leah Remini, who was also introduced into CSI as a child, later escaped, and since
6 been an outspoken critic of Scientology and CSI.
7

8 **(Jane Doe as a Subject of a Fair Game Campaign)**

9 101. As a result of her escape and her employment by, and association with, Ms.
10 Remini, Jane Doe was deemed a suppressive person.

11 102. In November of 2016, Ms. Remini, began producing and starring in a docuseries
12 entitled “Leah Remini: Scientology and the Aftermath,” (“Aftermath”). The Aftermath detailed
13 the stories of defected former members of CSI and exposed the abuses they suffered by CSI.
14

15 103. Aftermath received an Emmy for Best Informational Series in 2017.

16 104. Jane Doe was featured in an episode of the Aftermath, which aired in November of
17 2018.

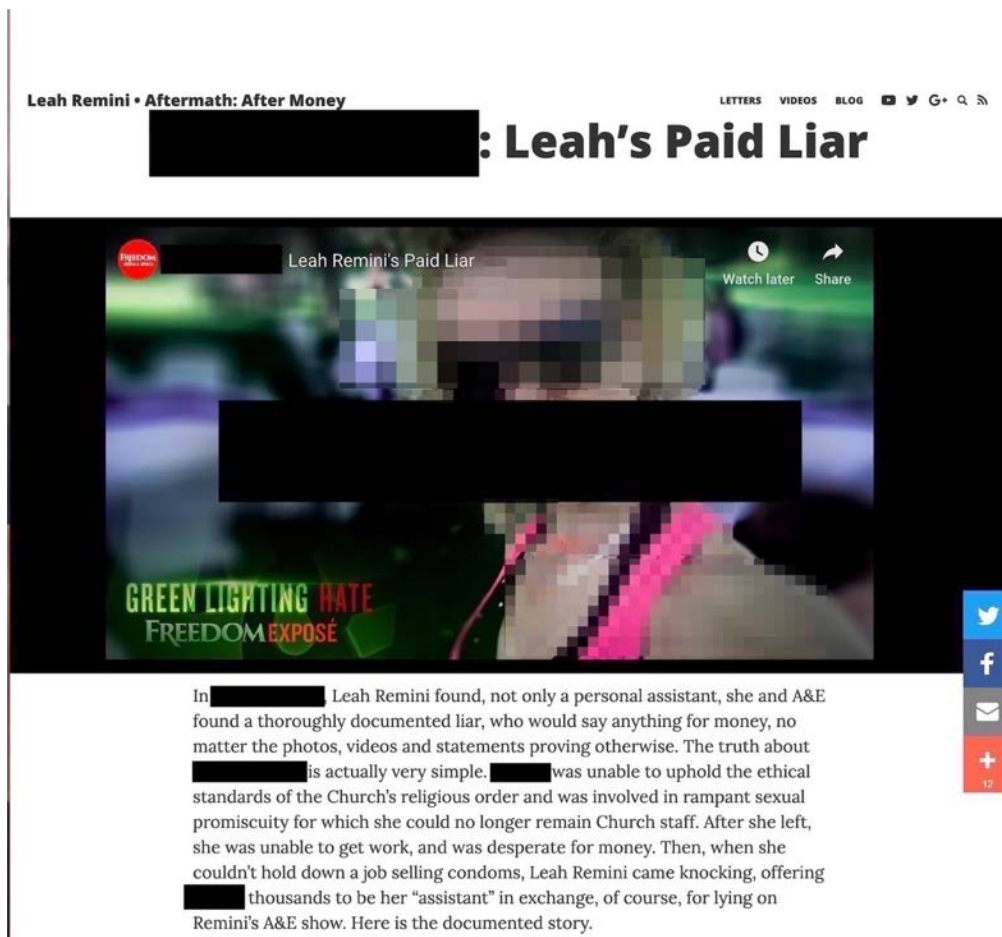
18 105. In response to the Aftermath, CSI copyrighted and published a hate website against
19 Jane Doe, Ms. Remini, and almost anyone else who was featured on the show. This website is
20 entitled leahreminaftermath.com (“the website”), and features “© 2019 Church of Scientology
21 International. All Rights Reserved,” at the bottom of each page.
22

23 106. Defendants use this page to disseminate false, defamatory, and inflammatory
24 information about Jane Doe, all under the CSI copyright.

25 107. The website features untruthful and damaging blog posts, articles, and videos
26 dedicated to attacking Jane Doe’s personal and professional reputation, with complete and utter
27 disregard for the truth.
28

1 108. One video entitled, “[Jane Doe]: Leah’s Paid Liar,” is embedded herein and
2 attached as “Exhibit A” was published on November 30, 2018 and is described as follows:

3 In [Jane Doe], Leah Remini found, not only a personal assistant, she and A&E
4 found a thoroughly documented liar, who would say anything for money, no
5 matter the photos, videos and statements proving otherwise. The truth about [Jane
6 Doe] is actually very simple. [Jane Doe] was unable to uphold the ethical standards
7 of the Church’s religious order and was involved in rampant sexual promiscuity
8 for which she could no longer remain Church staff. After she left, she was unable
9 to get work, and was desperate for money. Then, when she couldn’t hold down a
10 job selling condoms, Leah Remini came knocking, offering [Jane Doe] thousands
11 to be her “assistant” in exchange, of course, for lying on Remini’s A&E show.
12 Here is the documented story.²²



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20 In [REDACTED] Leah Remini found, not only a personal assistant, she and A&E
21 found a thoroughly documented liar, who would say anything for money, no
22 matter the photos, videos and statements proving otherwise. The truth about
23 [REDACTED] is actually very simple. [REDACTED] was unable to uphold the ethical
24 standards of the Church's religious order and was involved in rampant sexual
25 promiscuity for which she could no longer remain Church staff. After she left,
26 she was unable to get work, and was desperate for money. Then, when she
27 couldn't hold down a job selling condoms, Leah Remini came knocking, offering
28 [REDACTED] thousands to be her “assistant” in exchange, of course, for lying on
Remini's A&E show. Here is the documented story.

22 [Omitted]: Leah Remini's Paid Liar, Leah Remini Aftermath: After Money, (June 9, 2019),
<https://www.leahreminiaftermath.com/videos/valerie-haney-leahs-paid-liar.html>.

1 109. Defendants assert many false and harmful statements about Plaintiff in “Exhibit
2 A.” Defendants repeatedly call Plaintiff a liar, falsely claim Plaintiff lied on her resume, and
3 falsely assert that Plaintiff is an alcoholic. Additionally, Defendants falsely claim that Plaintiff
4 was dismissed from CSI for “rampant promiscuity.”

5
6 110. Another video published on November 25, 2018 entitled, “Leah Remini’s Paid
7 Liar—[Jane Doe] Sells Her Soul to the Devil and Destroys Her Family,” the description of which
8 is embedded herein with the video attached as “Exhibit B”. This video features her estranged
9 brother and sister-in-law, who CSI solicited to participate in its smear campaign. The video and
10 its description state Jane Doe is a “liar” who is “desperate for money.” The video and associated
11 description go on to assert that Jane Doe failed in past careers, and “stepped down to sell her soul,
12 her family, and her religion...”
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After hearing from his mother that his sister [REDACTED] was working for Remini and then finding out she was going on the Remini show, brother Jeffrey [REDACTED] an active Scientologist living in Tennessee, wrote to the production company to tell them the truth about his sister. Of course, they couldn't care less about the truth if it didn't fit their made-up storyline.



"I understand from my sister and my mother that [REDACTED] is engaging in this job and going on the show for money, health benefits and other perks. I realize she was in tough need of money and drinking and at a low point in her life, but I am not in agreement with her selling her soul by telling lies for the attempted creation of 'reality TV,'" he wrote.

Jeffrey also wrote that [REDACTED] cut off him and his children from his other sisters and his father and was trying to do the same thing with their mother. He said it all can be traced to her involvement with Remini, who hypocritically proclaims she believes families should get along.

They cut us off apparently because of how we looked...

"They cut us off apparently because of how we looked, but I suspect it is because of Leah Remini and her show that is designed to break apart families for the sake of emotional impact with a false story that is supposed 'reality,'" Jeffrey wrote.

1 Jeffrey wrote that his sister was trying to either destroy his family or was being encouraged or
2 instructed to do so for money, extra furniture, and other perks. He added that he found it
unbelievable that his sister was involved with Remini.

3 "██████ had promised me she would never involve herself with Remini, who she has spoken
4 about in the past as a horrible person," Jeffrey wrote. "I spoke to ██████ about it and she denied
it at first and then admitted what she was doing and that she was working for Leah Remini. I
5 assume that Remini is USING my sister ██████ in one of her episodes as well, as this has been
6 how Remini seems to operate, USING people for money."

7 ██████ was desperate for money, after failing as a condom saleswoman, she stepped
8 down to sell her soul, her family and religion and became Leah Remini's paid source/personal
9 assistant. As the saying goes: *An evil soul using a holy story is like a criminal who smiles at you.*
10 *He looks like a good apple but he's rotten at the core. Oh, liars can look so honest!*—William
11 Shakespeare

12 ***An evil soul using a holy story is like a criminal who
13 smiles at you. He looks like a good apple but he's
14 rotten at the core. Oh, liars can look so honest!***
15 ***—William Shakespeare***

16 Leah Remini continues to try and "make a buck" off her former Church in any way possible,
17 including breaking up families and paying sources to lie.

18 All the information on ██████ has been provided Remini, her production company and
19 A&E with full documentation.

20 This includes producers and former Harvey Weinstein personal assistants Eli Holzman and
21 Aaron Saidman, as well as A&E sleaze peddlers Paul Buccieri, Rob Sharenow and Elaine Frontain
22 Bryant.

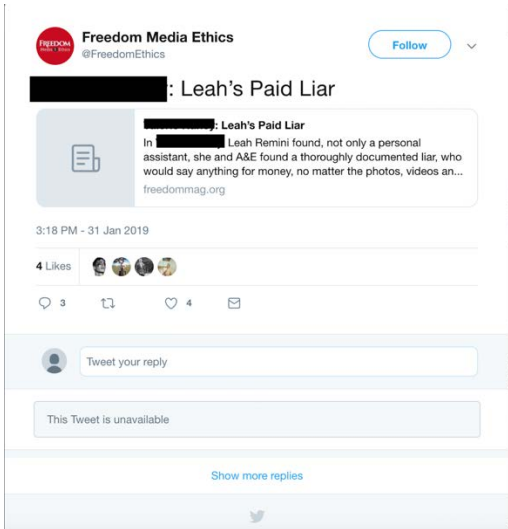
23 111. Similar articles, videos, and blog posts about Jane Doe are featured on
24 freedommag.org.

25 112. Freedommag.org is the official website of "Freedom Magazine," an official
26 Scientology publication, which also bears the Church of Scientology copyright. Per the Church of
27 Scientology copyright, Freedommag.org has been in publication since 1996.

28 113. "Freedom Magazine" has an official twitter account entitled "@freedomethics."
This account has tweeted links to the aforementioned defamatory articles on several occasions.
The tweets, which were posted on November 26, 2018 and January 31, 2019, are embedded
herein.²³

²³ @freedomethics, Freedom Media Ethics, (May 30, 2019) <https://twitter.com/FreedomEthics?lang=en>.

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114. The above referenced websites, articles, and blog/ posts are all false, and were published in retaliation for speaking out against CSI and its leaders. These publications were disseminated by Defendants with the intent to harass, intimidate, embarrass, humiliate, destroy and alarm Jane Doe in all aspects of her personal and professional life.

115. In addition to the online smear campaign, Defendants have stalked, surveilled, and followed Jane Doe. Beginning in 2017 through June of 2018, Defendants and their agents have followed Jane Doe while she was driving. On more than one occasion Jane Doe has been forced to change her route in an effort to curtail Defendant's surveillance efforts.

FIRST CAUSE OF ACTION
(False Imprisonment)

116. Plaintiff incorporates and references the averments contained above as though fully set forth herein.

1 117. Defendants did, in violation of Cal. Penal Code § 236, intentionally and unlawfully
2 confine Plaintiff so as to substantially restrict her movement without her consent.

3 118. Defendants confined Plaintiff through physical force, physical barriers, threat of
4 force, and/or any other form of unreasonable duress.

5 119. Plaintiff was without reasonable means of escape.

6 120. As a direct and proximate result of Defendants' conduct Plaintiff suffered, and will
7 continue to suffer, mental and physical injury, pain and suffering, serious psychological and
8 emotional distress, and mental anguish.

9 121. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
10 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
11 as allowed by law and in a sum to be proven at trial.

12 **SECOND CAUSE OF ACTION**

13 **(Kidnapping)**

14 122. Plaintiff incorporates and references the averments contained above as though
15 fully set forth herein.

16 123. Defendant did, in violation of Cal. Penal Code § 207(b), forcibly or by threat of
17 force or any other form of unreasonable duress, hold, detain, and/or arrest Plaintiff and carry her
18 to a different location without her consent.

19 124. As a direct and proximate result of Defendants' conduct Plaintiff suffered, and will
20 continue to suffer, mental and physical injury, pain and suffering, serious psychological and
21 emotional distress, and mental anguish.

22 125. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
23 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
24 as allowed by law and in a sum to be proven at trial.

1 **THIRD CAUSE OF ACTION**

2 **(Stalking—Civil Code § 1708.7)**

3 126. Plaintiff incorporate and references the averments contained above as though fully
4 set forth herein.

5 127. Defendants stalked Plaintiff by placing Plaintiff under online surveillance with the
6 intent to alarm, threaten, and harass Plaintiff.
7

8 128. Defendants followed Plaintiff online and likely in person per their codified “Fair
9 Game” policy, thus placing Plaintiff under surveillance with the intent to alarm, threaten, and
10 harass Plaintiff.

11 129. As a result of Defendants’ conduct, Plaintiff reasonably feared for her safety and
12 the safety of her family and Plaintiff suffered substantial emotional distress.

13 130. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
14 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
15 as allowed by law and in a sum to be proven at trial.
16

17 **FOURTH CAUSE OF ACTION**

18 **(Libel—Civil Code § 45, et seq.)**

19 131. Plaintiff incorporates and references the averments contained above and as though
20 fully set forth herein.

21 132. Defendants published defamatory statement(s) about Plaintiff, enumerated above,
22 specifically calling Plaintiff a “paid liar,” “unethical,” and “rampant[ly] promiscuous.”
23

24 133. The defamatory statement(s) published by Defendants were false and not
25 privileged. Defendants published the statements knowing the falsity thereof.

26 134. Defendants published the defamatory statement(s) with malice and with the intent
27 to injure Plaintiff’s reputation and interfere with her employment. Defendants published the
28

1 defamatory statement(s) with malice and with the intent to expose Plaintiff to public hatred,
2 contempt, ridicule, and disgrace.

3 135. The aforesaid defamatory publication(s) have harmed Plaintiff's reputation,
4 occupation, and future business and employment prospects.

5 136. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
6 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
7 as allowed by law and in a sum to be proven at trial.
8

9 **FIFTH CAUSE OF ACTION**

10 **(Slander—Civil Code § 46)**

11 137. Plaintiff incorporates and references the averments contained above as though
12 fully set forth herein.

13 138. Defendants made slanderous statement(s) about Plaintiff, enumerated above, but
14 specifically calling Plaintiff a "paid liar," "unethical," and "rampant[ly] promiscuous."
15

16 139. The slanderous statement(s) made by Defendants were false and not privileged.
17 Defendants published the statement(s) knowing the falsity thereof.

18 140. Defendants made the slanderous statement(s) with malice and with the intent to
19 injure Plaintiff's reputation and interfere with her employment.
20

21 141. The aforesaid slanderous statements have harmed Plaintiff's reputation,
22 occupation, and future business and employment prospects.

23 142. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
24 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
25 as allowed by law and in a sum to be proven at trial.

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1 **SIXTH CAUSE OF ACTION**

2 **(Constructive Invasion of Privacy—Civil Code § 1708.8)**

3 143. Plaintiff incorporates and references the averments contained above as though
4 fully set forth herein.

5 144. Defendants used Plaintiff’s likeness, her family members, and her personal images
6 to defame, embarrass, and harass her by publishing blog posts, videos, and images that falsely
7 depict Plaintiff as a “paid liar,” “unethical,” and “rampant[ly] promiscuous.”
8

9 145. Defendants, in a manner that is highly offensive and unreasonable, used a
10 recording device with the intention of capturing visual images, video recording, or sound
11 recording of Plaintiff engaging in private, personal and/or familial activities.

12 146. As a result of Defendants’ conduct, Plaintiff reasonably feared for her safety and
13 the safety of her family, and Plaintiff suffered substantial emotional distress.

14 147. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
15 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
16 as allowed by law and in a sum to be proven at trial.
17

18 **SEVENTH CAUSE OF ACTION**

19 **(Intentional Infliction of Emotional Distress)**

20 148. Plaintiff incorporates and references the averments contained above as though
21 fully set forth herein.

22 149. Defendants published false, defamatory, and inflammatory articles, blog posts, and
23 videos online depicting Plaintiff’s likeness. Moreover, Defendants enlisted Plaintiff’s estranged
24 family members to cosign false and harmful stories about Plaintiff, specifically describing
25 Plaintiff as a “paid liar,” “unethical,” and “rampant[ly] promiscuous.”
26

27 150. Defendants’ aforementioned conduct was outrageous.
28

1 151. Defendants acted with reckless disregard and/or intention that their conduct would
2 cause Plaintiff severe emotional distress.

3 152. The aforesaid outrageous conduct caused Plaintiff severe emotional distress,
4 suffering, anguish, anxiety, humiliation, and shame.

5 153. Wherefore, Plaintiff pray for judgment against Defendants in the form of all
6 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
7 as allowed by law and in a sum to be proven at trial.

8
9 **EIGHTH CAUSE OF ACTION**

10 **(Human Trafficking—Civil Code § 52.5(a))**

11 154. Plaintiff incorporates and references the averments contained above as though
12 fully set forth herein.

13 155. Defendants did, in violation of Cal. Penal Code § 236.1, directly or actively, aided
14 and abetted, or conspired with others to deprive or violate the personal liberty of the Plaintiff.

15 156. Defendants acted with the intent to obtain forced labor and/or services. Defendants
16 knowingly and substantially restricted the personal liberty of Plaintiff through fraud, deceit,
17 coercion, duress, menace, and threat of unlawful injury to Plaintiff, causing Plaintiff to reasonably
18 believe it likely that Defendants would carry out their threats. Defendants substantially restricted
19 the personal liberty of Plaintiff in order to obtain forced labor and services from her. Defendants
20 brought Plaintiff into their employ by using fraud, repeatedly refused her request to visit with
21 family, and knowingly prohibited Plaintiff from leaving Defendants' employment. Defendants'
22 fraud and psychological and emotional coercion was conduct that would and did reasonably
23 overbear the will of Plaintiff.

24 157. As a result of Defendants' conduct, Plaintiff is a victim of human trafficking as
25 defined in § 236.1 of the California Penal Code. Plaintiff has suffered damages and, pursuant to
26
27
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1 California Civil Code § 52.5, is entitled to recover actual, compensatory, and punitive damages as
2 well as reasonable attorneys' fees for Defendants' wrongful conduct.

3 158. As a result of Defendants' violation of California Penal Code § 236.1 and
4 California Civil Code § 52.5, Plaintiff was harmed and said conduct was a substantial factor in
5 causing Plaintiff's harm. As a direct and proximate result of the violation of California Penal
6 Code § 236.1 and California Civil Code § 52.5 by Defendants, Plaintiff has suffered, and
7 continues to suffer great pain of mind and body, shock, emotional distress, physical
8 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
9 and loss of enjoyment of life. Plaintiff was also prevented and will continue to be prevented from
10 performing daily activities and obtaining the full enjoyment of life. Plaintiff has also sustained
11 lost income, loss of earning capacity, and/or has incurred and will continue to incur expenses
12 including costs for medical and psychological treatment, therapy, counseling, and/or prescription
13 medication. Defendants' violation of California Civil Code § 52.5 entitles Plaintiff to recover up
14 to three times her actual damages, or ten thousand dollars (\$10,000), whichever is greater. In
15 doing the acts alleged in this Complaint, Defendants acted with oppression, fraud, malice, and
16 duress, and willful and conscious disregard for Plaintiff's physical and mental health, safety, and
17 rights secured by California Civil Code § 52.5. Plaintiff is therefore entitled to recover punitive
18 damages pursuant to California Civil Code § 52.5.

19 159. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
20 general and special damages in a sum to be proven at trial, and exemplary and punitive damages
21 as allowed by law and in a sum to be proven at trial.

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1 **NINTH CAUSE OF ACTION**

2 **(Violation of the California Labor Code - Failure to Pay Minimum Wages, Exceeding**
3 **Maximum Work Hours, and Overtime Against All Defendants)**

4 160. Plaintiff incorporates and references the averments contained above as though
5 fully set forth herein.

6
7 161. Plaintiff is not exempt from the requirements of the California Labor Code that she
8 be paid minimum wage and/or overtime as alleged herein.

9 162. Defendants forced Plaintiff to work hours exceeding the maximum allowed under
10 California Labor Code § 1198 and Department of Industrial Relations Wage Order 15-
11 2001(3)(A), 8 California Code of Regulations 11150 (“Wage Order 15”).

12 163. Upon information and belief, Defendants knowingly and willfully required,
13 suffered or permitted Plaintiff to work in excess of 8 hours in one workday and in excess of 40
14 hours in one workweek, and knowingly and willfully failed and refused to pay Plaintiff overtime
15 wages for overtime hours worked, in violation of California Labor Code §§ 510, 1194, and Wage
16 Order 15.

17
18 164. In violation of California Labor Code § 1197, Defendants knowingly and willfully
19 failed and refused to pay Plaintiff the minimum wage required under California law for the hours
20 worked and services provided for Defendants by Plaintiff, as well as for her on-call time.

21 165. Defendants’ failure to pay Plaintiff minimum wages and overtime premiums was
22 not in good faith, and Defendants had no reasonable grounds for believing that their failure to pay
23 such wages and overtime premiums was not a violation of California law.

24 166. Plaintiff is entitled to recover all unpaid minimum and/or overtime wages to which
25 she is entitled, plus interest and attorneys’ fees and costs incurred in bringing this civil action.
26
27
28

1 Plaintiff is also entitled to liquidated damages in an amount equal to the minimum wages
2 unlawfully not paid to her by Defendants and interest thereon.

3 167. As a result of Defendants' failure to pay Plaintiff minimum wages and overtime
4 premiums, Plaintiff was harmed and said conduct was a substantial factor in causing Plaintiff's
5 harm. As a direct and proximate result of the failure to pay Plaintiff minimum wages and
6 overtime premiums by Defendants, Plaintiff has suffered, and continues to suffer great pain of
7 mind and body, shock, emotional distress, physical manifestations of emotional distress,
8 embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Plaintiff
9 was also prevented and will continue to be prevented from performing daily activities and
10 obtaining the full enjoyment of life. Plaintiff has also sustained lost income, loss of earning
11 capacity, and/or has incurred and will continue to incur expenses including costs for medical and
12 psychological treatment, therapy, counseling, and/or prescription medication. Plaintiff is entitled
13 to all appropriate penalties under the California Labor Code.
14
15

16 168. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
17 general and special damages in a sum to be proven at trial as allowed by law and in a sum to be
18 proven at trial.
19

20 **TENTH CAUSE OF ACTION**

21 **(Violation of California Labor Code - Failure to Provide Days of Rest and Meal and Rest**
22 **Periods Against All Defendants)**

23 169. Plaintiff incorporates and references the averments contained above as though
24 fully set forth herein.

25 170. During Plaintiff's employment, Defendants failed to provide her with a day of rest
26 in every seven days in violation of California Labor Code §§ 551 and 552, and Wage Order 15.
27
28

1 171. Upon information and belief, in violation of California Labor Code §§ 226.7 and
2 512, and Wage Order 15, Defendants knowingly and willfully failed and refused to provide
3 Plaintiff with rest breaks and meal periods. Defendants did not compensate Plaintiff for her
4 missed meal and rest periods.

5 172. Plaintiff is entitled to recover penalties pursuant to California Labor Code § 558.

6 173. As a result of Defendants' failure to provide rest and meal breaks, and rest periods,
7 Plaintiff was harmed and said conduct was a substantial factor in causing Plaintiff's harm. As a
8 direct and proximate result of the failure to provide rest and meal breaks, and rest periods by
9 Defendants, Plaintiff has suffered, and continues to suffer great pain of mind and body, shock,
10 emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-
11 esteem, disgrace, humiliation, and loss of enjoyment of life. Plaintiff was also prevented and will
12 continue to be prevented from performing daily activities and obtaining the full enjoyment of life.
13 Plaintiff has also sustained lost income, loss of earning capacity, and/or has incurred and will
14 continue to incur expenses including costs for medical and psychological treatment, therapy,
15 counseling, and/or prescription medication. Plaintiff is entitled to all appropriate penalties under
16 the California Labor Code.

17 174. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
18 general and special damages in a sum to be proven at trial as allowed by law and in a sum to be
19 proven at trial.

20
21
22
23 **ELEVENTH CAUSE OF ACTION**

24 **(Violations of the California Labor Code §§ 203, 205, and 226 Against All Defendants)**

25 175. Plaintiff incorporates and references the averments contained above as though
26 fully set forth herein.
27
28

1 176. At the time Plaintiff left Defendants' employment, Defendants owed her wages
2 and overtime premiums, as alleged herein.

3 177. Upon information and belief, Defendants have willfully failed to pay Plaintiff the
4 wages and overtime premiums she is due following the termination of her employment, entitling
5 her to waiting time penalties pursuant to California Labor Code § 203.
6

7 178. In violation of California Labor Code § 226, Defendants never provided Plaintiff
8 itemized wage statements. Plaintiff is informed and believes and on that basis alleges that
9 Defendants have failed to keep adequate employment records and have not properly or adequately
10 recorded Plaintiff's hours worked during her employment.

11 179. In violation of California Labor Code § 205, at all times alleged herein, Defendants
12 failed to pay Plaintiff every 31 days.
13

14 180. As a result of Defendants' failure to pay wages and overtime premiums, Plaintiff
15 was harmed and said conduct was a substantial factor in causing Plaintiff's harm. As a direct and
16 proximate result of the failure to pay wages and overtime premiums by Defendants, Plaintiff has
17 suffered, and continues to suffer great pain of mind and body, shock, emotional distress, physical
18 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
19 and loss of enjoyment of life. Plaintiff was also prevented and will continue to be prevented from
20 performing daily activities and obtaining the full enjoyment of life. Plaintiff has also sustained
21 lost income, loss of earning capacity, and/or has incurred and will continue to incur expenses
22 including costs for medical and psychological treatment, therapy, counseling, and/or prescription
23 medication. Plaintiff is entitled to all appropriate penalties under the California Labor Code.
24

25 181. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
26 general and special damages in a sum to be proven at trial as allowed by law and in a sum to be
27 proven at trial.
28

1 TWELFTH CAUSE OF ACTION

2 **(Violation of California Labor Code § 970 - Fraudulent Inducement of Employment Against**
3 **All Defendants)**

4 182. Plaintiff incorporates and references the averments contained above as though
5 fully set forth herein.

6
7 183. Upon information and belief, Defendants knowingly made false representations to
8 Plaintiff about the circumstances and the lawfulness of her relocation from Florida to California
9 including, but not limited to, falsely informing Plaintiff that she would have a job working at the
10 Gold Base.

11 184. Defendants represented to Plaintiff that she would have a better life at the Gold
12 Base than she did in Florida. Defendants told Plaintiff that she would have time to do personal
13 activities and represented that her work would not exceed normal working hours.

14
15 185. Upon information and belief, Defendants had knowledge of the falsity of their
16 misrepresentations at the time those misrepresentations were made and/or had no reasonable
17 grounds for believing their representations to be true.

18 186. Upon information and belief, Defendants intended for Plaintiff to rely on their
19 false statements and misrepresentations to induce Plaintiff to relocate from the Florida to
20 California.

21
22 187. Plaintiff justifiably relied on Defendants' misrepresentations in deciding to leave
23 her home and family in Florida and travel to the California.

24 188. As a result of Defendants' misrepresentation, Plaintiff was harmed and said
25 conduct was a substantial factor in causing Plaintiff's harm. As a direct and proximate result of
26 the misrepresentations by Defendants, Plaintiff has suffered, and continues to suffer great pain of
27 mind and body, shock, emotional distress, physical manifestations of emotional distress,
28

1 embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. Plaintiff
2 was also prevented and will continue to be prevented from performing daily activities and
3 obtaining the full enjoyment of life. Plaintiff has also sustained lost income, loss of earning
4 capacity, and/or has incurred and will continue to incur expenses including costs for medical and
5 psychological treatment, therapy, counseling, and/or prescription medication. Plaintiff is entitled
6 to all appropriate penalties under the California Labor Code, including, but not limited to, double
7 damages.
8

9 189. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
10 general and special damages in a sum to be proven at trial as allowed by law and in a sum to be
11 proven at trial.
12

13 **THIRTEENTH CAUSE OF ACTION**

14 **(Negligent Misrepresentation Against All Defendants)**

15 190. Plaintiff incorporates and references the averments contained above as though
16 fully set forth herein.

17 191. Defendants made false representations to Plaintiff about the circumstances and the
18 lawfulness of her relocation to California including, but not limited to, falsely informing Plaintiff
19 that she would have a job working at the Gold Base.
20

21 192. Defendants represented to Plaintiff that she would have a better life at the Gold
22 Base than she did in Florida. Defendants told Plaintiff that she would have time to do personal
23 activities and represented that her hours working for them would not exceed normal working
24 hours.

25 193. Upon information and belief, one of Defendants' purposes in making these false
26 representations to Plaintiff was to induce her to leave Florida and travel to California where she
27
28

1 would be employed by Defendants without being paid the minimum wages and overtime
2 premiums required by law.

3 194. Upon information and belief, Defendants had no reasonable grounds for believing
4 their representations to be true.

5 195. Upon information and belief, Defendants intended for Plaintiff to rely on their
6 false statements and misrepresentations. Plaintiff justifiably relied on Defendants'
7 misrepresentations in deciding to leave her home and family in Florida and travel to California.
8

9 196. As a result of Defendants' false statements and misrepresentation, Plaintiff was
10 harmed and said conduct was a substantial factor in causing Plaintiff's harm. As a direct and
11 proximate result of the false statements and misrepresentations by Defendants, Plaintiff has
12 suffered, and continues to suffer great pain of mind and body, shock, emotional distress, physical
13 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
14 and loss of enjoyment of life. Plaintiff was also prevented and will continue to be prevented from
15 performing daily activities and obtaining the full enjoyment of life. Plaintiff has also sustained
16 lost income, loss of earning capacity, and/or has incurred and will continue to incur expenses
17 including costs for medical and psychological treatment, therapy, counseling, and/or prescription
18 medication.
19

20 197. Wherefore, Plaintiff prays for judgment against Defendants in the form of all
21 general and special damages in a sum to be proven at trial as allowed by law and in a sum to be
22 proven at trial.
23

24 **FOURTEENTH CAUSE OF ACTION**

25 **(Negligence Against All Defendants)**

26 198. Plaintiff incorporates and references the averments contained above as though
27 fully set forth herein.
28

1 199. Defendants owed a duty of care to Plaintiff as employers. Defendants stood in a
2 special relationship to Plaintiff including, but not limited to the following: Defendants contracted
3 with Plaintiff for her employment at the Gold Base; Defendants arranged and paid for Plaintiff's
4 travel to California; Plaintiff lived at the Gold base at Defendants' invitation and insistence;
5 Defendants refused to let her leave the Gold Base unaccompanied.

7 200. The California Labor Code imposes duties on employers, including the duty to
8 allow an employee one day's rest in seven under Labor Code §§ 551 and 552, and "[t]o do every
9 other thing reasonably necessary to protect the life, safety, and health of employees." Labor Code
10 § 6403(c).

11 201. By virtue of the relationship described above and Defendants' positions as
12 Plaintiff's employers, Defendants' duty of reasonable care toward Plaintiff under the
13 circumstances included, but was not limited to: 1) a duty to provide reasonable accommodations
14 and a safe working and living environment; 2) a duty of reasonable care under the circumstances
15 to protect Plaintiff's emotional state; 3) a duty to allow Plaintiff at least one day in seven to rest
16 from her work; 4) a duty to ensure Plaintiff was informed of her rights as an employee under the
17 laws of the United States and the State of California; 5) a duty to allow and provide Plaintiff the
18 opportunity to leave the residence; 6) and a duty to allow Plaintiff to remain in contact with
19 relatives, friends, and the world outside the Gold Base. Defendants assumed a duty of care to
20 Plaintiff beyond that owed to the public in general including, but not limited to the duties listed
21 above.
22

23
24 202. Defendants breached these duties owed to Plaintiff by the acts and omissions
25 including, but not limited to: subjecting Plaintiff to threats and abuse; the failure to allow Plaintiff
26 at least one day's rest in seven; the failure to allow or provide Plaintiff means to leave the
27 residence or contact the outside world; and the failure to allow Plaintiff to remain in contact with
28

1 relatives, friends, and the world outside the Gold Base. Defendants also breached that duty of
2 care by failing to provide adequate working conditions, forcing Plaintiff to clean without proper
3 protection or ventilation, and failing to provide adequate habitation.

4 203. The services provided by Plaintiff to Defendants were performed under conditions
5 that violated California Civil Code § 52.5 and provisions of the California Labor Code and the
6 IWC Wage Orders as alleged in this Complaint. All Defendants knew or reasonably should have
7 known of these egregious and ongoing violations, yet did and have done nothing to alleviate,
8 investigate, remedy, or report the violations to appropriate authorities.

9
10 204. The anti-trafficking provisions of California Civil Code § 52.5 and the minimum
11 wage and overtime guarantees and other provisions of the California Labor Code and applicable
12 IWC Wage Orders were enacted to protect workers from economic and personal injuries caused
13 by forced labor, poverty-level wages, unduly long working hours, and other substandard working
14 conditions. The acts and omissions of Defendants were a substantial factor contributing to the
15 illegal working conditions under which Plaintiff labored.

16
17 205. Plaintiff is among the class of persons that California Civil Code § 52.5, the
18 California Labor Code, and the IWC Wage Orders were designed to protect and for whose
19 protection these statutes and regulations were adopted. Plaintiff's injuries are of the type that the
20 foregoing statutes and regulations are intended to prevent. Defendants' violations of the
21 foregoing statutes and regulations constituted negligence per se and created a presumption of
22 negligence.

23
24 206. Defendants' conduct caused Plaintiff to suffer serious emotional distress including,
25 but not limited to suffering, anguish, fright, nervousness, grief, anxiety, worry, shock,
26 humiliation, and/or shame. Plaintiff was unable to cope with Defendants' conduct.

