

ORIGINAL

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**FILED**  
Superior Court of California  
County of Los Angeles

**AUG 22 2019**

Sherri R. Carter, Executive Officer/Clerk of Court  
By  Deputy  
Isaac Love

16 **SEE ATTACHMENT A FOR ADDITIONAL**  
17 **ATTORNEYS REPRESENTING PLAINTIFFS**

18 Attorneys for Plaintiffs

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

21 CHRISSIE CARNELL BIXLER; CEDRIC  
22 BIXLER-ZAVALA; JANE DOE #1; MARIE  
23 BOBETTE RIALES; and JANE DOE #2,

24 Plaintiffs,

25 v.

26 CHURCH OF SCIENTOLOGY  
27 INTERNATIONAL; RELIGIOUS  
28 TECHNOLOGY CENTER; CHURCH OF  
SCIENTOLOGY CELEBRITY CENTRE  
INTERNATIONAL; DAVID MISCAVIGE;  
DANIEL MASTERSON; and DOES 1 – 25,

Defendants.

Case No.: **19STCV29458**

**COMPLAINT FOR DAMAGES**

1. STALKING IN VIOLATION OF CAL. CIV. CODE § 1708.7
2. PHYSICAL INVASION OF PRIVACY IN VIOLATION OF CAL. CIV. CODE § 1708.8
3. CONSTRUCTIVE INVASION OF PRIVACY IN VIOLATION OF CAL. CIV. CODE § 1708.8
4. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
5. LOSS OF CONSORTIUM

**JURY TRIAL DEMANDED**

BY FAX

**COMPLAINT FOR DAMAGES**

Plaintiffs, Chrissie Carnell Bixler, Cedric Bixler-Zavala, Jane Doe #1, Bobette Riales, and Jane Doe #2, submit their complaint against Defendants, The Church of Scientology International;

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1 Religious Technology Center; Church of Scientology Celebrity Centre International; David  
2 Miscavige; Daniel Masterson; and DOES 1 – 25, and allege as follows:

3 **INTRODUCTION**

4 1. This case is brought against the Defendant Organizations of Scientology, its leader,  
5 David Miscavige, and one its staff members, Daniel Masterson, for the Defendants' conspiracy to  
6 cover up that Daniel Masterson sexually assaulted four young women. When those women came  
7 forward to report Masterson's crimes, the Defendants conspired to and systematically stalked,  
8 harassed, invaded their and their family's privacy, and intentionally caused them emotional  
9 distress to silence and intimidate them.  
10

11 **PARTIES**

12 2. Plaintiff, Chrissie Carnell Bixler, is an adult female who works and resides in the  
13 State of California.

14 3. Plaintiff, Cedric Bixler-Zavala, is an adult male who works and resides in the State  
15 of California and at all times material is and was the lawful husband of Plaintiff Chrissie Carnell  
16 Bixler.  
17

18 4. Plaintiff, Jane Doe #1, is an adult female whose name and address are not  
19 contained in this Complaint so as to protect her privacy and identity as she incurred injuries and  
20 damages of a sensitive nature as a result of the intentional acts of Defendants outlined below.  
21 Information which could identify Jane Doe #1 is not contained herein. Plaintiff may be contacted  
22 through her counsel as outlined herein. There exists good cause for Plaintiff to use a pseudonym  
23 due to the harmful effect of the public disclosure of her identity and the harm inflicted by the  
24 Defendants to Jane Doe #1. Plaintiff's undersigned counsel will provide the identity of Plaintiff to  
25 all Defendants. As such, Defendants suffer no prejudice as a result of concealing her identity in  
26 the Complaint and Verifications.  
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1           5.       Plaintiff, Marie Bobette Riales, is an adult female who lives and works in the State  
2 of Indiana.

3           6.       Plaintiff, Jane Doe #2, is an adult female whose name and address are not  
4 contained in this Complaint so as to protect her privacy and identity as she incurred injuries and  
5 damages of a sensitive nature as a result of the intentional acts of Defendants outlined below.  
6 Information which could identify Jane Doe #2 is not contained herein. Plaintiff may be contacted  
7 through her counsel as outlined herein. There exists good cause for Plaintiff to use a pseudonym  
8 due to the harmful effect of the public disclosure of her identity and the harm inflicted by the  
9 Defendants to Jane Doe #2. Plaintiff's undersigned counsel will provide the identity of Plaintiff to  
10 all Defendants. As such, Defendants suffer no prejudice as a result of concealing her identity in  
11 the Complaint and Verifications.  
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13           7.       Defendant, Church of Scientology International ("CSI"), is a California  
14 Corporation which, at all material times, was doing business in the County of Los Angeles, State  
15 of California. CSI's primary place of business and headquarters is located at 6331 Hollywood  
16 Boulevard, Los Angeles, California 90028.  
17

18           8.       Defendant, Religious Technology Center ("RTC"), is a California Corporation  
19 which, at all material times, was doing business in the County of Los Angeles, State of California.  
20 RTC's primary place of business and headquarters is located at 1710 Ivar Avenue, Suite 1100, Los  
21 Angeles, California 90028.  
22

23           9.       Defendant, Church of Scientology Celebrity Centre International ("CCI"), is a  
24 California Corporation which, at all material times, was doing business in the County of Los  
25  
26  
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28

1 Angeles, State of California. CCI's primary place of business and headquarters is located at 5930  
2 Franklin Avenue, Los Angeles, California 90028.<sup>1</sup>

3 10. Defendant, David Miscavige, is and at all material times was a resident of Los  
4 Angeles, California. Mr. Miscavige is the Chairman of the Board of the RTC, and the de facto  
5 leader of all aspects of RTC, CSI, CCI, and any related Scientology institution/organization,  
6 including, but not limited to, the Sea Organization and the Office of Special Affairs. Mr.  
7 Miscavige is believed to reside at 6331 Hollywood Boulevard, Suite 1100, Los Angeles,  
8 California 90028.

9  
10 11. Defendant, Daniel Masterson, is and at all relevant times was believed to be a  
11 resident of Los Angeles, California. Mr. Masterson is believed to reside at 2151 Hollyridge Drive,  
12 Los Angeles, California 90068.

13 12. At all relevant times, the Institutional Defendants, Mr. Miscavige, and Mr.  
14 Masterson acted through their/his employees, members, servants, and respective agents. At all  
15 times relevant hereto, Defendants Does 1 through 25, inclusive, were the agents, servants,  
16 employees, representatives, contractors, and/or subcontractors of the Institutional Defendants, Mr.  
17 Miscavige, and/or Mr. Masterson and in doing the things herein alleged, were acting within the  
18 course and scope and purpose of their authority as such agents, servants, employees,  
19 representatives, contractors, and/or subcontractors, and with the permission and consent of their  
20 employer and the Institutional Defendants, Mr. Miscavige, and/or Mr. Masterson. The true names  
21 and capacities, whether individual, corporate, associate, or otherwise, of Defendants DOES 1  
22 through 25, inclusive, are unknown to Plaintiffs, who therefore sues these Defendants by said  
23 fictitious names.  
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28 <sup>1</sup> Where appropriate, Defendants CSI, RTC, and CCI are hereinafter referred to collectively as the  
"Institutional Defendants."

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**JURISDICTION AND VENUE**

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13. The Court has jurisdiction over this action pursuant to California Code of Civil Procedure § 410.10. Plaintiffs seek damages under the statutory and common law of the State of California for Defendants’ wrongful actions.

14. Venue is proper in this Court pursuant to California Code of Civil Procedure § 395 because (a) some of the acts and transactions described herein occurred within this county; (b) Defendants are or were registered to do business in the State of California and/or were doing business within this county; (c) because Defendants did do business in this county by operating and/or exercising complete control over the operations of the Institutional Defendants; and (d) because Defendants Miscavige and Masterson are individuals residing in this county.

**INTRODUCTION**

15. This case is brought against the Defendant Organizations of Scientology, its leader, David Miscavige, and one its staff members, Daniel Masterson, for the Defendants’ conspiracy to cover up that Daniel Masterson sexually assaulted four young women. When those women came forward to report Masterson’s crimes, the Defendants conspired to and systematically stalked, harassed, invaded their and their family’s privacy, and intentionally caused them emotional distress to silence and intimidate them.

**FACTUAL HISTORY**

**(Background and Organizational Structure of Scientology)**

16. Defendants, RTC and CSI, along with a network of Scientology organizations that sit underneath RTC and CSI, including the CCI, make up what is informally known to the public as “The Church of Scientology” or “Scientology.” “Scientology” was created by L. Ron Hubbard in 1952 following the publication of “Dianetics: The Modern Science of Mental Health.” Its practices are mandated by the writings, thoughts, and teachings of Mr. Hubbard.

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1 17. 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 policies,  
3 procedures, and practices as written and dictated by L. Ron Hubbard.

4 18. After L. Ron Hubbard passed away in 1986, Defendant David Miscavige assumed  
5 control of Scientology and is known as "Chairman of the Board" or "COB." Defendant Miscavige  
6 operates, manages, and/or controls RTC, CSI, and the entire network of Scientology organizations  
7 that fall beneath RTC and CSI, including the CCI.

8 19. The senior hierarchy of Scientology organizations, including, but not limited to the  
9 RTC, CSI, and CCI are staffed and run by an organization known as the Sea Organization ("Sea  
10 Org").  
11 Org").

12 20. The Sea Org is a paramilitary organization wherein each Sea Org member holds a  
13 naval rank from Swamper (initiate) to Commodore (the title held by Scientology founder L. Ron.  
14 Hubbard during his life). The Sea Org is comprised of Scientology's most dedicated members.

15 21. Defendant Miscavige controls, directs, and supervises the Sea Org and its  
16 members.  
17 members.

18 **(The Practice of Auditing)**

19 22. A Scientologist's salvation is premised on completing the "Bridge to Total  
20 Freedom," which requires reading Mr. Hubbard's extensive materials and completing a series of  
21 courses and "auditing sessions." These courses and auditing sessions are the only way to achieve  
22 the coveted status of "Clear" and, beyond that, "Operating Thetan."

23 23. During an "auditing session," a member meets with an "auditor," who is generally  
24 a higher-ranking Scientologist and often a Sea Org member. The "auditor" has the member hold  
25 two metal rods commonly referred to as "cans" of an "electropsychometer" or "e-meter." An e-  
26 meter, is designed to "measure[] the mental state or change of state of a person and thus is of  
27 meter, is designed to "measure[] the mental state or change of state of a person and thus is of  
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1 benefit to the auditor . . . [to] locate areas to be handled.”<sup>2</sup> As Hubbard said and Defendants  
2 maintain, “an e-meter is better known as a ‘lie detector’ and is used to ascertain truth of  
3 background and conduct.”<sup>3</sup>

4 24. Members are audited repeatedly. Auditing sessions may occur daily and involve  
5 several hours of being forced to reveal explicit, personal details regarding daily thoughts and  
6 activities, including sexual habits, crimes committed (including violent crimes, such as rape),  
7 sexual fantasies, adultery, etc.

8  
9 25. During these sessions, the auditor takes copious notes on what the member reports,  
10 including information relating to crimes they have committed or that have been committed against  
11 them. These notes are then placed in a folder and maintained by Scientology permanently.

12 **(Reporting Crime is Forbidden)**

13 26. Whether discovered during auditing or otherwise, Defendants forbid members from  
14 contacting police to report a crime committed by any member. The Institutional Defendants  
15 instruct their members and agents that reporting such instances to law enforcement is considered a  
16 “high crime” and subjects the member to punishment.

17  
18 27. The Defendants instruct their members and agents that:

19 Police and courts offer an open-armed opportunity to the vicious and  
20 corrupt to establish themselves in a position of safety while satisfying their  
21 strange appetites of perverted viciousness toward their fellow man. . . .  
22 Justice systems thereby become a sort of cancer which erode every splendid  
23 ambition and achievement of the decent citizen. . . . “Justice” apparently  
24 cannot be trusted in the hands of Man. . . . Who is Public Enemy #1 today?  
25 The FBI! Its obvious target is every opinion leader and public-spirited  
26 group in America!<sup>4</sup>

27 <sup>2</sup> CHURCH OF SCIENTOLOGY INT’L, <http://www.whatisscientology.org/html/Part14/Chp50/pg1020-a.html> (last visited Aug. 12, 2019).

28 <sup>3</sup> Hubbard Commc’ns Office Bulletin from L. Ron Hubbard, Scientology Founder, regarding Security Check[s] (Feb. 3, 1960).

<sup>4</sup> L. Ron Hubbard, INTRODUCTION TO SCIENTOLOGY ETHICS (1972).



(The Concept of "Fair Game")

1  
2 36. Per Defendants' directives, anyone who flees Scientology or is otherwise deemed  
3 an SP, must be silenced by whatever means necessary. Defendants instruct members to damage  
4 the person's professional reputation, file frivolous lawsuits, and harass and surveil "the enemy."  
5 The policy and practice of destroying these individuals is known within Scientology as the "Fair  
6 Game Policy."

7  
8 37. A person who is declared an enemy of Scientology is Fair Game for relentless and  
9 cruel behavior. A person who is Fair Game "[m]ay be deprived of property or injured by any  
10 means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or  
11 lied to or destroyed."<sup>5</sup>

12 38. Defendants instruct OSA and its agents to "haunt" declared enemies of Scientology  
13 through concrete action, including surveillance and the use of private investigators. Moreover,  
14 according to Hubbard's mandates, information must be disseminated that will damage the  
15 individual's professional and private reputation regardless of the truth of the information  
16 disseminated. Defendants' policies and procedures encourage and/or instruct followers to "ruin  
17 [the individual] utterly."<sup>6</sup>

18  
19 39. Moreover, under the Defendants' policy and practice, they must threaten that which  
20 an enemy seeks to protect, or as Hubbard ordered, "discover what the person really is defending  
21 and threaten it effectively."<sup>7</sup> This includes friends and family of an enemy of Scientology.

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27 <sup>5</sup> *Allard v. Church of Scientology*, 58 Cal. App. 3d 439 n.1 (Ct. App. 1976).

28 <sup>6</sup> L. Ron Hubbard, *A Manual on the Dissemination of Material*, THE MAGAZINE OF DIANETICS AND SCIENTOLOGY, Mar. 1955, at 157.

<sup>7</sup> Mem. regarding Counter Attack Tactics (Mar. 28, 1972).

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(Implementation of "Fair Game")

1  
2 40. Defendants implement Fair Game in a variety of different ways all with the single  
3 objective to destroy anyone whom they have deemed an enemy of Scientology with the ultimate  
4 goal to "shudder [them] into silence,"<sup>8</sup> "obliterate [them],"<sup>9</sup> and "ruin [them] utterly."<sup>10</sup>

5 41. Historically, Defendants have hired private investigators to surveil, follow, video  
6 record, and photograph SPs. The Institutional Defendants have rented homes in close proximity to  
7 the perceived threat to place their "enemies" under around-the-clock surveillance.  
8

9 42. Subjects of Defendants' fair gaming activities have included The United States  
10 Government, United States Attorneys, Elected Officials, Judges, The Drug Enforcement  
11 Administration, The United States Coast Guard, The American Medical Association, The National  
12 Institute of Mental Health, as well as former members or other individuals.

13 43. In 1979, multiple Scientologists, including L. Ron Hubbard's wife, Mary Sue  
14 Hubbard, were convicted of conspiring to infiltrate, wiretap, and steal United States government  
15 documents. The United States Attorney's Office's Sentencing Memorandum in that matter  
16 outlined Scientology's fair-gaming tactics and conduct:  
17

18 They believed that they had carte blanche to violate the rights of others, frame  
19 critics in order to destroy them, burglarize private and public offices and steal  
20 documents outlining the strategy of individuals and organizations that the Church  
21 had sued. . . . To these defendants and their associates, however, anyone who did  
22 not agree with them was considered to be an enemy against whom the so-called  
23 "fair game doctrine" could be invoked. . . . The crimes committed by these  
24 defendants is of a breadth and scope previously unheard of. No building, office,  
25 desk, or file was safe from their snooping and prying. No individual or organization  
26 was free from their despicable conspiratorial minds. The tools of their trade were  
27 miniature transmitters, lock picks, secret codes, forged credentials, and any other  
28 device they found necessary to carry out their conspiratorial schemes.<sup>11</sup>

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<sup>8</sup> Hubbard Commc'ns Office Manual of Justice by L. Ron Hubbard, Scientology Founder.

<sup>9</sup> Hubbard Commc'ns Office Policy Letter from L. Ron Hubbard, Scientology Founder, regarding Battle Tactics (Feb. 16, 1969).

<sup>10</sup> Hubbard, *A Manual on the Dissemination of Material*, *supra*, at n.7.

<sup>11</sup> Sentencing Mem. of the United States at 45-46, 69, *United States of America v. Mary Sue Hubbard, et al.*, criminal case no. 78-401 (D.C. Cir. Dec. 3, 1979), [https://archive.org/stream/USA.V.MarySueHubbardEtAl/Sentencing%20memorandum\\_djvu.txt](https://archive.org/stream/USA.V.MarySueHubbardEtAl/Sentencing%20memorandum_djvu.txt).



1 44. Despite the release of the Sentencing Memorandum, Scientology's use of  
2 extraordinary surveillance tactics and technology has not ceased. In 2012, two private  
3 investigators revealed they had been assigned to conduct various surveillance operations for the  
4 Institutional Defendants and Defendant Miscavige for the preceding twenty-five years.<sup>12</sup>  
5

6 45. In 2013, a private investigator surveilling Defendant Miscavige's father (who had  
7 left Scientology) was arrested by law enforcement in Wisconsin. He was found with two rifles,  
8 four handguns, 2,000 rounds of ammunition, a homemade silencer, two laptop computers,  
9 binoculars, a GPS tracking device, and a stun gun. He revealed he had been following the elder  
10 Miscavige for eighteen months at the direction of Defendants CSI and Miscavige. His  
11 surveillance tactics included eavesdropping, taking the elder Miscavige's garbage, photographing  
12 him, and placing a magnetic GPS tracking device under his vehicle.<sup>13</sup>  
13

14 46. In March 2014, another private investigator was arrested by the FBI when it was  
15 learned that he was illegally wiretapping phone calls and hacking into the email accounts of,  
16 among others, two individuals identified as enemies by the Institutional Defendants.<sup>14</sup>  
17

18 47. Courts have repeatedly acknowledged the existence of the Defendants' fair-gaming  
19 policy and conduct. Scientology has a "history of seeking retribution against its perceived  
20 enemies."<sup>15</sup>  
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22 <sup>12</sup> Thomas C. Tobin, *Private investigator's lawsuit against Church of Scientology comes to an end*, TAMPA BAY TIMES, Dec. 1, 2012, <https://www.tampabay.com/news/scientology/private-investigators-lawsuit-against-church-of-scientology-comes-to-an-end/1264073>.

23 <sup>13</sup> Kim Christensen, *Exclusive: Scientology head's father was spied on, police report says*, LOS ANGELES TIMES, Apr. 8, 2015, <https://www.latimes.com/local/california/la-me-scientology-private-eyes-20150409-story.html>.<sup>[OOB]</sup>

24 <sup>14</sup> Matthew Goldstein, *Hired Hacker Who Named Clients Now Fears Retaliation*, N.Y. TIMES, July 8, 2015, <https://www.nytimes.com/2015/07/09/business/dealbook/hacker-feared-retaliation-from-clients-court-documents-show.html>.

25 <sup>15</sup> See also *Wollersheim v. Church of Scientology*, 212 Cal. App. 3d 872, 880, (Ct. App. 1989),  
26 cert. granted, judgment vacated sub nom. *Church of Scientology of California v. Wollersheim*, 499  
27 U.S. 914 (1991) ("Scientology is a hierarchical organization which exhibits near paranoid attitudes  
28 toward certain institutions and individuals—in particular, the government, mental health



**(Defendant Daniel Masterson and the  
Institutional Defendants' Special Treatment of Celebrities)**

1  
2 48. Nearly since its inception, Scientology has had a special focus on “artists,  
3 politicians, leaders of industry, [and] sports figures.”<sup>16</sup> This was because Scientology’s founder, L.  
4 Ron Hubbard, saw these individuals, and celebrities in particular, as powerful tools to influence  
5 and recruit new members.  
6

7 49. Hubbard developed “Project Celebrity” to recruit celebrities to accept his nascent  
8 belief system and adopt his practices.<sup>17</sup> Hubbard encouraged Scientologists to target celebrities as  
9 “quarry” and recruit them to Scientology.<sup>18</sup> Hubbard published a list of celebrities and then  
10 promised any member who was able to “bring one [] home” a “small plaque as a reward.”<sup>19</sup>

11 50. Those considered celebrities are given special status and granted their own  
12 “churches.” These “Celebrity Centres” were established as organizations “specifically founded” to  
13 provide special Scientology services “to artists, athletes and leaders in the business world.”<sup>20</sup>

14  
15 51. Defendant Daniel Masterson was born into Scientology. He began Scientology  
16 “coursework” between the ages of eight and ten.

17 52. Defendant Masterson rose to public prominence in 1998 when he appeared on the  
18 television show *That 70's Show*.

19 53. Once he achieved this celebrity status, Masterson became highly regarded within  
20 the Church of Scientology and was granted special treatment. Masterson has also held prominent  
21

22  
23 professions, disaffected members and others who criticize the organization or its leadership.  
24 Evidence also was introduced detailing Scientology's retribution policy, sometimes called “fair  
game.”).

25 <sup>16</sup> SCIENTOLOGY Celebrity Centre Int’l, [https://www.scientology.cc/en\\_US/about/index.html](https://www.scientology.cc/en_US/about/index.html) (last  
visited Aug. 13, 2019).

26 <sup>17</sup> Joel Sappell & Robert Welkos, *The Courting of Celebrities*, LOS ANGELES TIMES, June 25,  
1990, <https://www.latimes.com/local/la-scientology062590b-story.html>.

27 <sup>18</sup> *Id.*

27 <sup>19</sup> *Id.*

28 <sup>20</sup> SCIENTOLOGY NEWSROOM, <https://www.scientologynews.org/faq/what-are-celebrity-centres.html> (last visited Aug. 13, 2019).

1 roles within Scientology, including being a Commissioner for the Citizens Commission on Human  
2 Rights International, an organization founded in 1969 by the Church of Scientology “to investigate  
3 and expose psychiatric violations of human rights.” Masterson also has a history of promoting and  
4 fundraising for Scientology.

5 54. The Institutional Defendants closely monitor and protect celebrity members.

6 55. To that end, the Institutional Defendants and Defendant Miscavige worked with  
7 Defendant Masterson to keep Masterson’s sexual assault victims from reporting their abuse and  
8 mobilized an aggressive Fair Game campaign against the victims once the sexual assaults had  
9 been disclosed.  
10

11 **(Plaintiff Chrissie Bixler’s Background with Scientology and Defendant Masterson)**

12 56. Plaintiff Bixler was working in Los Angeles, California when she met Masterson at  
13 a party in 1996. They started dating, and the couple moved in together and lived in a house with  
14 Masterson’s three younger siblings.  
15

16 57. Masterson was controlling in the relationship, and Plaintiff Bixler became involved  
17 in the Church of Scientology in 1997 per his orders.

18 58. Masterson regularly forced Plaintiff Bixler to have sex with him and became  
19 violent when Plaintiff Bixler refused. In one instance, after Plaintiff Bixler refused sex, Masterson  
20 dragged Plaintiff Bixler naked across their bedroom floor while berating her appearance. He then  
21 threw her, still naked, into the hall and locked the bedroom door.  
22

23 59. Following this incident, Plaintiff Bixler was required by the Institutional  
24 Defendants to do an “ethics program” during which she told an employee of the Institutional  
25 Defendants about Masterson’s sexually coercive and abusive treatment of her. The employee  
26 advised Plaintiff Bixler that her job as Masterson’s girlfriend was “to give him sex whenever he  
27 wants it” and that if she complied, “these things wouldn’t happen.”  
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1           60.     In late 2001 to early 2002, Masterson's already violent treatment of Plaintiff Bixler  
2 escalated. Masterson committed multiple acts of sexual violence and assault against Plaintiff  
3 Bixler. On more than one occasion Plaintiff Bixler awoke in bed to find Masterson sexually  
4 assaulting her. In one specific instance, Masterson drugged Plaintiff Bixler's wine at dinner and  
5 anally assaulted her. The following morning, Masterson admitted that he had anal sex with her  
6 while she was unconscious.

7  
8           61.     The next day, Plaintiff Bixler went to Defendant CSI to report Masterson's actions  
9 to head ethics officer, Miranda Pearson Scoggins. Mrs. Scoggins listened to Plaintiff Bixler's  
10 account and told her that Plaintiff Bixler was not to refer to the incident as "rape." Mrs. Scoggins  
11 assisted Plaintiff Bixler in writing a report about what happened, but instead of a standard incident  
12 report, Plaintiff Bixler was instructed to write a "Things That Shouldn't Be" Report. In summary,  
13 Mrs. Scoggins told Plaintiff Bixler that she was not raped, because "you can't be raped by  
14 someone you are in a consensual relationship with." Mrs. Scoggins went on to ask Plaintiff Bixler  
15 what she did to cause the assault and ordered her to complete an ethics course.

16  
17           62.     Mrs. Scoggins then ordered Plaintiff Bixler to read several Hubbard ethics policies  
18 including "Ethics Protection" and a list of acts considered to be "High Crimes" within  
19 Scientology, which if committed, would result in a person being declared an SP. These High  
20 Crimes included reporting to the authorities the sexual assault Defendant Masterson had  
21 committed.

22  
23           63.     Plaintiff Bixler was also ordered to read policies detailing how the Institutional  
24 Defendants deal with SPs. It was clear to Plaintiff Bixler that continuing to talk about the incident  
25 would result in Plaintiff Bixler being declared an SP and being subjected to the harsh treatment  
26 accorded enemies of Scientology.

1 64. From January through February 2002, Plaintiff Bixler was made to do continuous  
2 ethics programs while the Institutional Defendants imposed no negative consequences on  
3 Masterson despite his criminal actions. Masterson told Plaintiff Bixler that Scientology justified  
4 his treatment of her. He explained he did not have to attend ethics programs because he was  
5 flourishing and prospering in life. (Defendants largely equate "goodness" with individual  
6 success.)

7  
8 65. In mid-February 2002, Plaintiff Bixler broke up with Masterson and moved out of  
9 his home. Afterwards, she was ordered to meet with Chris Scoggins, an employee of the  
10 Institutional Defendants, and Masterson.

11 66. When she arrived at Mr. Scoggins's office, there was a document prepared for her  
12 to sign stating that she would never speak publicly about her relationship with Masterson or sue  
13 him for any reason.

14 67. Plaintiff Bixler was not permitted to read the document nor was she given a copy of  
15 it. Plaintiff Bixler was told she owed her life to Masterson because he saved her by bringing her  
16 into Scientology and she had to sign the document then and there. Mr. Scoggins remarked to  
17 Masterson in Plaintiff Bixler's presence: "She will sign it. She will like being a Scientologist more  
18 than she will like the alternative."  
19

20 68. Plaintiff Bixler signed the document because she feared that if she did not  
21 cooperate, she would be labeled a "suppressive person" or "SP," be subjected to fair game, and  
22 lose her friends and family.

23 **(Defendants' Fair Gaming Campaign Against the Bixler Plaintiffs)**

24  
25 69. In the following years, Plaintiff Bixler did not disclose the sexual abuse and assault  
26 she suffered from Defendant Masterson.

27  
28

1           70. But in early 2016, Plaintiff Bixler was contacted by D.P., a former Scientologist  
2 and friend of Masterson's, who asked if Masterson had raped Plaintiff Bixler. When Plaintiff  
3 Bixler confirmed that she had been sexually assaulted by Defendant Masterson, D.P. informed her  
4 that he knew of another woman, Plaintiff Jane Doe #1, who was sexually assaulted by Masterson.

5           71. D.P. told Plaintiff Bixler he was present at Masterson's house and witnessed part of  
6 Defendant Masterson's assault of Plaintiff Jane Doe #1. Within days of witnessing the assault,  
7 D.P. had been called to report to a Defendant CCI facility and told by Institutional Defendants'  
8 employee, representative, and agent Miranda Scoggins that Plaintiff Jane Doe #1 was being  
9 "handled."  
10

11           72. D.P. would later be harassed by the Institutional Defendants and others acting at the  
12 direction of Defendants when he cooperated with law enforcement in support of Plaintiffs.

13           73. The day after learning another woman had also suffered from being sexually  
14 assaulted by Defendant Masterson, Plaintiff Bixler had a panic attack and was hospitalized.  
15 Plaintiff Bixler has suffered from panic attacks since that time.

16           74. Shortly after receiving D.P.'s phone call, Plaintiff Bixler was contacted by Jenny  
17 Butler, the Vice President of Defendant CCI. Butler asked Plaintiff Bixler if she was contacted by  
18 D.P. Upon hearing that she had been so contacted, Butler told Plaintiff Bixler not to speak to D.P.  
19 again as he was a "suppressive person."  
20

21           75. In September of 2016, Plaintiff Bixler emailed Ethics Officer Ellery Travers of  
22 Defendant CCI to inform her of what Masterson had done to Plaintiff Bixler and to inquire how  
23 CSI had handled her 2002 report of sexual assault. Travers responded by saying Masterson's  
24 folders were not at CCI but said she would look into it. Travers then failed to return any of  
25 Plaintiff Bixler's phone calls, texts, or emails.  
26  
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1 76. Plaintiff Bixler sought Plaintiff Jane Doe #1's contact information and in October  
2 of 2016, they were able to speak. They discussed the abuse they had suffered from Defendant  
3 Masterson and the Institutional Defendants.

4 77. In the following days, Plaintiff Bixler sent letters to Defendant Masterson, Brie  
5 Shaffer (his personal assistant), Travers, Butler, and Susan Watson (President of Defendant CCI),  
6 formally terminating her relationship with Scientology and informing them that she was aware of  
7 the roles they played in her abuse and the subsequent efforts to silence her.  
8

9 78. Plaintiff Bixler never heard back from any of those individuals, but after sending  
10 the letters, Plaintiff Bixler's friends and associates who were Scientologists completely  
11 disconnected from her and blocked her on social media.

12 79. After sending the letters, Plaintiff Bixler was contacted by Masterson's publicist,  
13 Jenni Weinman. Plaintiff Bixler refused many of her calls but agreed to speak after Weinman said  
14 she was contacting Plaintiff Bixler because "it's about to get bad for you and your family."  
15 Weinman forwarded a letter from Masterson to Plaintiff Bixler. The letter contained threatening,  
16 abusive, and harassing language.  
17

18 80. Weinman also stated to Plaintiff Bixler that what she was claiming happened  
19 between her and Masterson could not constitute rape because she and Masterson were in a  
20 relationship at the time.

21 81. These statements were nearly identical to those Plaintiff Bixler had been told years  
22 ago by the Institutional Defendants, and Weinman was later recorded making them again about  
23 Plaintiff Bixler  
24

25 82. In December of 2016, Plaintiff Bixler reported the sexual assault against her by  
26 Masterson to police, and the Los Angeles Police Department opened an investigation. The  
27 investigation is still ongoing.  
28

1           83.     The Institutional Defendants then declared Plaintiff Bixler an SP and conducted  
2 harassment, surveillance, and abuse of the Bixler Plaintiffs pursuant to the fair gaming policy.

3           84.     Upon information and belief, all the following-described acts of harassment,  
4 surveillance, and/or stalking were carried out by or at the direction of Defendants' employees,  
5 agents, and/or representatives.

6           85.     Almost weekly, the Bixler Plaintiffs awoke to find their car doors and trunk  
7 opened.

8           86.     Throughout 2017, on a persistent and regular basis, the Bixler Plaintiffs observed  
9 Defendants' agents loitering outside their home and looking into their windows. The Bixler  
10 Plaintiffs observed vans parking outside their home and filming their home and family.

11           87.     As a result, the Bixler Plaintiffs invested in a home security system and installed  
12 cameras. During the installation, the technician verbally supplied the Bixler Plaintiffs with the  
13 password for the system. Within five minutes, the security system was hacked, and the password  
14 was changed. The installation technician, who was still present and observed the unsolicited  
15 change in password, had no explanation for how this could occur.  
16  
17

18           88.     Over the course of four months, Defendants hacked and disabled the Bixler  
19 Plaintiffs' home security system five times.

20           89.     In October of 2017, Plaintiff Bixler was driving on the street where her home was  
21 located when she was chased by two of Defendants' agents in a vehicle who were filming her.  
22 Plaintiff Bixler was so frightened that she drove to the local police department. Plaintiff Bixler  
23 reported this incident and the hacking attempts to law enforcement and was advised not to return  
24 home for the night.  
25

26           90.     When Plaintiff Bixler returned to her home, she noticed that a pile of important  
27 mail was missing from the table she had left it on.  
28

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1           91.    The following day, the Bixler Plaintiffs' family dog died inexplicably. They  
2 requested an autopsy and learned that the dog died of unexplained traumatic injuries to her trachea  
3 and esophagus.

4           92.    In November of 2017, Defendants' agent followed Plaintiff Bixler into a nail salon  
5 and harassed and photographed her.

6           93.    In November of 2017, Defendants hacked Plaintiff Bixler's email account and  
7 attempted to delete it.

8           94.    In January of 2018, the Bixler Plaintiffs and their family moved back to Los  
9 Angeles, California. Three days after moving into their new residence, they awoke to find all their  
10 car doors open.

11           95.    In June of 2018, Defendants hacked into Plaintiff Bixler's Instagram account and  
12 attempted to change the password.

13           96.    In August of 2018, Plaintiff Bixler saw a man in a white truck parked outside of her  
14 home for several hours. During this time, Plaintiff Bixler was experiencing technical issues with  
15 her cell phone. Plaintiff Bixler approached the man and observed a computer, cell phone, and  
16 other device set up inside his truck. The man and Plaintiff Bixler got into a verbal altercation, and  
17 the man ultimately spat on Plaintiff Bixler. Plaintiff Bixler called the police and the man was later  
18 identified as Steve Miller, an agent of Defendants.

19           97.    Steve Miller and his vehicle were later identified by Plaintiff Jane Doe #1 and D.P.  
20 as the same person who previously surveilled them in front of their homes. He was also identified  
21 by individuals who had seen Miller passing out Scientology pamphlets on Hollywood Boulevard  
22 in Los Angeles, California.

23           98.    In August of 2018, Defendants' agents Heather Seidler and Virginia Macgregor  
24 published posts to their Facebook accounts inciting fellow Scientologists to assist in harassing  
25

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1 Plaintiff Bixler. In one post, Macgregor stated that Plaintiff Bixler was “reminiscing about all the  
2 anal sex [Plaintiff Bixler] obviously miss[es].”

3 99. In and around September of 2018, Defendants’ agent Kathy Gold started publicly  
4 threatening Plaintiff Bixler, the other Plaintiffs, and their relatives. Gold threatened to commit  
5 serious and violent crimes against Plaintiffs including murder. Gold accused Plaintiffs of being  
6 religious bigots and liars. Gold threatened to report Plaintiff Bixler to Child Services to have the  
7 Bixler Plaintiffs’ then five-year-old twins taken away from them and further threatened that the  
8 children would be drugged and raped.  
9

10 100. Also around this time, Defendants’ agents broke the lock to the Bixler Plaintiffs’  
11 front door.

12 101. Since Plaintiff Bixler’s report to law enforcement in December 2016, the Bixler  
13 Plaintiffs have repeatedly been the subject of credit card fraud. The Bixler Plaintiffs also have  
14 been subjected to fraudulent credit schemes that have resulted in creditors and collectors harassing  
15 them for payment on items and services that they did not order or receive.  
16

17 102. Plaintiff Bixler has been targeted for harassment via social media, including by  
18 anonymous and/or unidentified individuals that utilized information that could be gathered only  
19 from the Institutional Defendants’ auditing files.

20 103. Plaintiff Bixler has been the victim of fake ads posted by Defendants on Craig’s  
21 List which purport to be her soliciting anal sex from strangers. She has subsequently received  
22 contact from men responding to the fake ads.  
23

24 104. In April of 2019, Plaintiff Bixler and Plaintiff Jane Doe #1 attended Denim Day, a  
25 sexual violence prevention event. When they arrived, they were immediately confronted by  
26 Defendants’ agents who harassed and filmed them. Scientologist Taryn Rinder confronted both  
27 Plaintiff Bixler and Plaintiff Jane Doe #1.  
28

1           105. In May of 2019, Plaintiff Bixler received messages from a person she did not know  
2 who asked Plaintiff Bixler to meet him at 6331 Hollywood Boulevard, which is the headquarters  
3 of Defendant CSI, the purported residence of Miscavige, and a location from which both  
4 Defendant RTC and OSA operate.

5           106. In June of 2019, an agent of Defendants and friend of Defendant Masterson's  
6 contacted Plaintiff Bixler-Zavala and threatened to leak nude photos of an underage Plaintiff  
7 Bixler.

8           107. Also in June 2019, Plaintiff Bixler was run off the road by a vehicle that was  
9 following her.  
10

11           108. Defendants fraudulently registered Plaintiff Bixler's vehicle so that it appeared  
12 stolen.

13           109. In June of 2019, the Bixler Plaintiffs and their family moved to a new home as a  
14 result of this constant surveillance and harassment. They specifically selected this residence as it is  
15 private and surrounded by government owned property. No other homes were visible from inside  
16 the Bixler Plaintiffs' home at the time they moved in. After moving in, Plaintiff Chrissie Bixler  
17 observed two men on an adjacent property cutting down a large tree branch. Once this tree branch  
18 was removed, the inside of the home was visible to another property that was previously blocked  
19 by the branch.  
20

21           110. In July of 2019, a different tree on the Bixler Plaintiffs' property was poisoned and  
22 had to be removed. Once removed, the Bixler Plaintiffs' property was further visible to adjacent  
23 properties.  
24

25           111. Also in July of 2019, the Bixler Plaintiffs observed a man loitering around their  
26 property and looking into windows for over two hours. Upon seeing the man outside, Plaintiff  
27 Bixler-Zavala stated "he's OSA for sure." Seemingly able to hear him, the man looked up  
28

1 immediately and smiled at the Bixler Plaintiffs. The man left, only to return several hours later.  
2 When the Bixler Plaintiffs saw him the second time, he smiled and waved.

3 112. The Bixler Plaintiffs' trash has been regularly stolen for approximately the last  
4 three years.

5 113. Defendants have used numerous technological forms of harassment against the  
6 Bixler Plaintiffs. Both have received repeated and harassing spam phone calls. Plaintiff Bixler has  
7 received calls on her phone that appear to originate from her own phone number. The Bixler  
8 Plaintiffs receive text alerts that are delayed by days, weeks, months, and even years. Plaintiff  
9 Bixler has received emails originating from her own email account containing dangerous links she  
10 did not send. The Bixler Plaintiffs were the victims of repeated email hacks that included the  
11 destruction of important email messages contained in their accounts. Plaintiff Bixler's phone was  
12 "ported" such that calls, text messages, and other information were routed to a device that does not  
13 belong to her, and of which she is not in possession.  
14

15 114. To this day, the Bixler Plaintiffs continues to be threatened, harassed, stalked, and  
16 surveilled.  
17

18 **(Plaintiff Jane Doe #1's Background with Scientology and Danny Masterson)**

19 115. Plaintiff Jane Doe #1 was raised in Scientology by her parents and became a  
20 member of the Sea Org at age seventeen.

21 116. Jane Doe #1 met Daniel Masterson in 1999-2000 as he was acquainted with Jane  
22 Doe #1's father. Additionally, Jane Doe #1's close friend, Brie Shaffer was employed as  
23 Masterson's personal assistant.  
24

25 117. Jane Doe #1 would see Masterson often at social gatherings due to their mutual  
26 friends, but they were not friends themselves.  
27  
28

1 118. At these social gatherings, Masterson would make sexual advances towards Jane  
2 Doe #1 then berate her when she refused him.

3 119. In September 2002, Jane Doe #1 was supposed to meet with a group that included  
4 Shaffer, Defendant Masterson, and others. After she had arrived, Jane Doe #1 learned that Shaffer  
5 was not going to attend. She did, however, encounter Masterson, who had already purchased her a  
6 drink and encouraged her to consume it.

7 120. Immediately after Jane Doe #1 finished the first drink, Masterson ordered her a  
8 second. As she began to consume the second drink, Jane Doe #1 felt the effects of the alcohol. The  
9 effects Jane Doe #1 felt were greater than she expected after having consumed similar amounts of  
10 alcohol in the past.

11 121. Jane Doe #1 was supposed to stay at Shaffer's house but due to her absence and  
12 other factors, Shaffer arranged for Jane Doe #1 to stay in Masterson's guest room.

13 122. Jane Doe #1 was intoxicated and went to bed alone in the guest room. She awoke to  
14 Masterson having sex with her. Jane Doe #1 was intoxicated to the point that she could not have  
15 consented and in fact did not consent to this sexual contact. She was confused, disoriented, scared,  
16 and intoxicated to the point that she could not defend herself or resist.

17 123. Eventually, Jane Doe #1 was able to push Masterson off of her.

18 124. Jane Doe #1 did not want to have sex with Masterson and did not consent to any  
19 sexual encounter, but she blamed herself for what occurred for having consumed alcohol that  
20 night. Nonetheless, she tried to avoid being alone with Masterson.

21 125. On or about April 24-25, 2003, Jane Doe #1 was present for a gathering at  
22 Masterson's home. There were multiple people present. Most were in Masterson's backyard  
23 drinking and using a Jacuzzi tub.  
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1           126. Masterson made Jane Doe #1 a drink and as she drank it, she began to feel very  
2 sick and disoriented. Jane Doe #1 became far more intoxicated than she had been previously when  
3 drinking the same amount of alcohol. Jane Doe #1 could only conclude that she had been drugged.

4           127. Defendant Masterson forcefully pulled Jane Doe #1 out of her chair and pushed her  
5 into the Jacuzzi tub.

6           128. After Jane Doe #1 got out of the Jacuzzi tub, she began to feel worse, she could not  
7 open her eyes and was having a difficult time breathing. Masterson said he would take her inside  
8 to throw up. Jane Doe #1 said she did not want to go with him. Masterson's close friend, Luke  
9 Watson, suggested that he should take care of Jane Doe #1. Watson is the son of Susan Watson,  
10 President of Defendant CCI. Defendant Masterson insisted that he take Jane Doe #1 and  
11 proceeded to pick up Jane Doe #1 who protested Masterson trying to carry her upstairs.  
12

13           129. Jane Doe #1 was disoriented and unable to stand on her own. Masterson put Jane  
14 Doe #1 in front of the toilet and stuck his fingers down her throat to induce vomiting. He then  
15 undressed her and put her in the shower where he handled her very aggressively and sexually  
16 assaulted her. Jane Doe #1 was intermittently unconscious. Masterson then dragged Jane Doe #1  
17 from the shower and threw her onto his bed where she passed out.  
18

19           130. Jane Doe #1 awoke to Defendant Masterson raping her. She attempted to fight him  
20 off by shoving a pillow into his face, but he pushed it back down onto her face, making it difficult  
21 for her to breathe.

22           131. Jane Doe #1 attempted to make noise, but Masterson picked up a gun off of his  
23 nightstand, pointed it at her, and told her to be quiet.  
24

25           132. Defendant Masterson held Jane Doe #1 down and anally assaulted her. Masterson  
26 only stopped when he heard a voice at the bedroom door and went to investigate.  
27  
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1 133. Jane Doe #1 does not specifically recall when, but she recalls at one point escaping  
2 the bedroom and returning downstairs. She recalls Defendant Masterson and Watson grabbing her  
3 to bring her back up to Masterson's bedroom.

4 134. Jane Doe #1 recalls crawling into the bedroom closet and passing out. She next  
5 recalls waking up the next morning naked and hiding in the closet.

6 135. Although not by Jane Doe #1, this sexual assault was reported to Defendant CSI.  
7 Unbeknownst to Jane Doe #1, a portion of the events leading to the April 24-25, 2003, sexual  
8 assault were witnessed by an individual named D.P. (the same D.P. that would later contact  
9 Plaintiff Bixler and inform her she was not Defendant Masterson's only assault victim). D.P. was  
10 concerned about Jane Doe #1's condition when he saw Masterson carrying her up the stairs. D.P.  
11 saw Jane Doe #1 approximately "about an hour or an hour and a half later" when she came up to  
12 him with wet hair and bare feet and said "Oh my God Danny just raped me." D.P. also observed  
13 Masterson and Watson trying to get Jane Doe #1 back upstairs.  
14

15 136. D.P., who was a Scientologist at the time, was called into the Church of  
16 Scientology Celebrity Centre within days of the sexual assault. He was confronted by Defendant  
17 CCI Ethics Officer Miranda Scoggins and told "in no uncertain terms" that Masterson "had not  
18 done anything" to Jane Doe #1. He was told that Jane Doe #1 was "doing ethics handlings to help  
19 her." D.P., tried to do as he was told but would remain "haunted" by what he saw for years until  
20 he became the connection between Jane Doe #1 and Plaintiff Bixler.  
21

22 137. In May of 2003, Jane Doe #1 reported her assault to her Ethics Officer, Julian  
23 Swartz. Swartz is an Ethics Officer to many celebrities and other prominent Scientologists and as  
24 a result he consistently communicates with the highest levels of Defendant CSI.  
25

26 138. Jane Doe #1 reported to Swartz what she recalled at the time about what Masterson  
27 had done. She also reported that she had told a friend. Swartz instructed Jane Doe #1 to go back to  
28



1 her friend and tell him that what she said about Masterson was not true and that she was joking.  
2 Swartz also told her not to speak about it to anyone and that it would be handled internally within  
3 Scientology. Jane Doe #1 attempted to explain to Swartz that what happened was rape. This  
4 infuriated Swartz who insisted to Jane Doe #1 that this was not rape and that she was “not to use  
5 the ‘R’ word again.”

6 139. Defendant CSI required Jane Doe #1 to begin an ethics program that Swartz  
7 designed. It required that she report to him daily and get his permission to travel. It required her to  
8 read many policies, including those policies that state it is a “high crime” to report anything  
9 criminal or negative about another Scientologist, policies regarding disconnection,<sup>21</sup> policies  
10 regarding how one becomes declared a Suppressive Person, and policies that describe what  
11 happens to Suppressive Persons. Swartz consistently reminded her not to talk about the sexual  
12 assault and repeatedly told her that high ranking officials within CSI were aware of her ethics  
13 programming and monitoring it closely.

14 140. The ethics program designed by Swartz also included frequent and seemingly  
15 endless auditing sessions in which Jane Doe #1 was repeatedly asked to admit to “past crimes”  
16 that she allegedly committed during previous lifetimes. Jane Doe #1 was pressured into  
17 “confessing” to “evil purposes” she had toward Masterson, Scientology, L. Ron Hubbard, and  
18 others.

19 141. In July 2003, Jane Doe #1 encountered Watson, whom she had not seen since she  
20 was last assaulted by Defendant Masterson with Watson’s assistance. Watson, admitted that he  
21 reported the sexual assault directly to Defendant Miscavige.

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26 <sup>21</sup> Any member of Scientology who is related to, friends with, or an associate of an SP must  
27 immediately disassociate from that person. This policy is known as “disconnection.” Though  
28 Scientology claims that this is the individual’s decision, failure to disconnect means that the  
member will be declared a Potential Trouble Source—and ultimately an SP—themselves.

1           142. In December of 2003, Officials from the Institutional Defendants discovered that  
2 Jane Doe #1 had told friends and family about the sexual assault. She was first ordered to meet  
3 with Miranda Scoggins and then Swartz. She was handed a “non-enturbulation order,” a formal  
4 censure that precedes a Scientologist being declared a suppressive person. She was told that if she  
5 continued to talk about the assault, she would instantly be declared a suppressive person and  
6 would be subject to Fair Game.

7           143. In January 2004, Jane Doe #1 was made to undergo “security checks” or “sec  
8 checks” which are used by the Institutional Defendants as a form of investigation. Jane Doe #1  
9 was subjected to intense auditing that included reading reports written about her sexual assault,  
10 including those written by Watson and Masterson. Defendant Masterson’s included admissions to  
11 the Institutional Defendants about the sexual assault. Despite Defendant Masterson’s and  
12 Watson’s admissions, the Institutional Defendants and Defendant Miscavige never took negative  
13 action against Defendant Masterson.

14           144. At the conclusion of this “sec check,” Jane Doe #1 was forced to sit in a room  
15 alone with Masterson, the man who sexually assaulted her, at the direction of the Institutional  
16 Defendants so that they could “clear the air.”

17           145. In January 2004, Jane Doe #1’s mother, who is a Scientologist, wrote a letter to  
18 Tammy Wilkoff, an official with Defendant RTC. In it, she detailed the sexual assaults committed  
19 against Jane Doe #1 and the woefully inadequate response from the Institutional Defendants. She  
20 detailed a number of disturbing reports written about the assault and how CSI and/or CCI was  
21 failing to address it. She also wrote that she believed the non-enturbulation order entered against  
22 Jane Doe #1 was intended to suppress information related to her assault from being made known.  
23 She also related that she learned Shaffer had written a report concerning the sexual assault to the  
24 Institutional Defendants the day after it occurred.  
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1           146. In March 2004, frustrated with the lack of progress after her January 2004 letter,  
2 Jane Doe #1's mother wrote another letter, this time directly to Defendant Miscavige. She attached  
3 her January 2004 letter and demanded that Miscavige act. She detailed admissions by Masterson  
4 and Watson, as well as inconsistencies in their account of what had occurred.

5           147. In response to these letters Jane Doe #1's non-enturbulation order was lifted and  
6 she was given free auditing by the Institutional Defendants.

7           148. Jane Doe #1 received a letter on April 21, 2004, from Defendant CSI International  
8 Justice Chief Mike Ellis reminding her of the written policy in Scientology that it is a  
9 "Suppressive Act" to report a fellow Scientologist in good standing to civil authorities.

10           149. On June 6, 2004, despite more than a year of Institutional Defendants and their  
11 agents trying to convince Jane Doe #1 she was not raped, Jane Doe #1 reported the sexual assault  
12 to the Los Angeles Police Department. Defendants mobilized against Jane Doe #1 to ensure no  
13 charges were filed. This included convincing D.P., a critical witness to a criminal prosecution, that  
14 nothing wrong or criminal had occurred.

15           150. After her report to LAPD, Kendrick Moxon, a partner from Moxon and Bowles, the  
16 law firm that exclusively represents the interests of the Institutional Defendants and its affiliate  
17 organizations, arrived to Jane Doe #1's parents' home while she was also present. The attorney  
18 carried with him a letter, written by Defendant Masterson, where he stated words to the effect of  
19 "if you got hurt, sorry you got hurt." Jane Doe #1 was astonished that this is how Masterson  
20 attempted to apologize for raping her. Jane Doe #1 was told that she was not allowed to keep the  
21 letter. Moxon also stated that Swartz would be contacting Jane Doe #1 to broker a meeting  
22 between Jane Doe #1 and an attorney for Masterson, which Swartz did.

23           151. In 2016, Jane Doe #1 learned that Plaintiff Bixler was seeking to contact her. Jane  
24 Doe #1 connected with Plaintiff Bixler and told Plaintiff Bixler about the assault by Masterson.  
25  
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1 Jane Doe #1 contacted the Los Angeles Police Department to re-open the investigation into her  
2 previously reported sexual assault.

3 **(The Institutional Defendants' Fair Gaming Campaign**  
4 **Against Plaintiff Jane Doe #1)**

5 152. As a result of reporting her sexual assault to the police, Jane Doe #1 was ultimately  
6 declared a "suppressive person" by the Institutional Defendants.

7 153. After Jane Doe #1 contacted the police for the second time, Defendants carried out  
8 an intense fair game campaign against her.

9 154. Upon information and belief, all the following-described acts of harassment,  
10 surveillance, and/or stalking were carried out by or at the direction of Defendants' employees,  
11 agents, and/or representatives.

12 155. From late 2016 to present, Jane Doe #1 has received hundreds of phone calls and  
13 text messages from unknown numbers. On one occasion, Jane Doe #1 answered and a man's voice  
14 asked if Jane Doe #1 was "scared" before the call was quickly terminated.

15 156. In November of 2016, Jane Doe #1 was followed and surveilled by Defendants'  
16 agent Michelle Miskovich. Miskovich followed Jane Doe #1 to a Best Buy and proceeded to  
17 follow her into the store. After this instance, Miskovich contacted a reporter to claim that Plaintiffs  
18 were fabricating their claims against Masterson. Several months later, Miskovich contacted B.S., a  
19 witness to Jane Doe #1's sexual assault, in an attempt to dissuade B.S. from speaking with police.

20 157. Defendants had others attempt to dissuade B.S. from telling the truth. For instance,  
21 Vanessa Mooney, who claimed to B.S. that Jane Doe #1 was fabricating her claims against  
22 Masterson.

23 158. Jane Doe #1 observed an SUV sitting outside of her home on many occasions for  
24 long periods of time. Jane Doe #1 observed the Defendants' agent driver of the SUV  
25 photographing her with his cell phone.  
26  
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1           159. In March of 2017, a blog was posted online publicly revealing the existence of an  
2 LAPD investigation into Defendant Masterson as a result of reports of sexual abuse.

3           160. In March and April of 2017, Jane Doe #1's mother, a Scientologist, called Jane Doe  
4 #1 many times and told Jane Doe #1 that Jane Doe #1 is being followed and her trash is being  
5 taken. Jane Doe #1's trash has in fact been frequently stolen. She has also observed people  
6 following her on many occasions.

7           161. From April of 2017 through June of 2018, Jane Doe #1 frequently awoke to find all  
8 her car doors and trunk open.

9           162. In March of 2017, Jane Doe #1's car was broken into in front of her home and two  
10 debit cards were stolen. The accounts linked to those cards were then over-drafted in the middle of  
11 the night.

12           163. On many occasions, Jane Doe #1 observed her trash being dumped into the back of  
13 a vehicle.

14           164. In April of 2017, Jane Doe #1 noticed she was frequently being followed.

15           165. Beginning in March 2018, Jane Doe #1 observed people frequently parking outside  
16 of her family home for hours and looking into her windows. On one occasion, Jane Doe #1  
17 confronted an agent of the Defendants, a woman who was surveilling her home. Beginning in May  
18 2018, the woman would stand outside the curtilage of Jane Doe #1's home at night and stare at the  
19 property. The woman would also rifle through Jane Doe #1's trash. On certain evenings, the  
20 woman would use a flashlight and point the beam into various windows of the home including  
21 into the bedrooms of Jane Doe #1's children. The woman also followed Jane Doe #1 in public  
22 during the day including to Jane Doe #1's hair salon where she stood outside the window staring  
23 at Jane Doe #1. During the summer of 2018, Jane Doe #1 went on an extended vacation and the  
24 woman no longer stood outside her house. When Jane Doe #1 returned, so did the woman. One  
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1 evening when Jane Doe #1 observed the woman stalking her outside her house she contacted  
2 LAPD who then followed the woman to her own residence. The woman provided a fake name to  
3 LAPD. The woman was later identified by police, despite her initially producing a false  
4 identification.

5 166. In and around September of 2018, Defendants' agent Kathy Gold started publicly  
6 threatening Plaintiffs and their families. Gold threatened to commit serious and violent crimes  
7 against Plaintiffs, including murder. Gold accused Plaintiffs of being religious bigots and liars.  
8

9 167. In January of 2019, Jane Doe #1 was at an appointment with an accountant. When  
10 she left the appointment and was walking to her car, she was accosted by two agents of the  
11 Defendants, a male and female. They were yelling at her and threatening her life. The male spat on  
12 Jane Doe #1's windshield as she fled the parking lot. Jane Doe #1 later found out that a major  
13 tenant that shares the building with her accountant is a company run by a Scientologist. She was  
14 able to use the company website to identify the two individuals that accosted her and threatened  
15 her life. Both are Scientologists.  
16

17 168. In March of 2019, Jane Doe #1 was followed into a grocery store by a man in a Sea  
18 Org uniform.

19 169. In March of 2019, Jane Doe #1 observed that the home adjacent to the rear of her  
20 property trimmed back a tree that had secluded Jane Doe #1's home. After the tree was trimmed,  
21 Jane Doe #1's home was now visible from the neighboring property. Around this time, Jane Doe  
22 #1's cell phone map application would frequently malfunction and redirect her to the neighboring  
23 property instead of her own home. Additionally, Jane Doe #1's husband observed a man standing  
24 at the property line watching Jane Doe #1's family home. When Jane Doe #1's husband  
25 confronted him, the man fled back to the neighboring property. Jane Doe #1 later discovered that  
26 the property is owned by Scientologists, and their son, who is a Sea Org Member, resides at that  
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1 property. Jane Doe #1 learned that the son only moved into the property after she reported her  
2 sexual assault by Masterson to police for the second time.

3 170. In June of 2019, a tree that partially obstructed the view of Jane Doe #1's home  
4 from the neighboring property was poisoned at the root. Jane Doe #1 consulted with a gardener  
5 who informed her of the poisoning and advised her to cut down the tree. In doing so, Jane Doe  
6 #1's property can easily be seen from her neighbor's property, the same home described above.

7 171. Also during this time period, Jane Doe #1 found phallic clay objects had been  
8 thrown in her backyard.

9 172. Jane Doe #1 has experienced various acts of fraud committed against her including  
10 prescription fraud. She has also experienced a host of issues with technology outside of that  
11 detailed above including but not limited to having her cellular devices connect to other devices  
12 that she does not own and has never heard of as well as hearing voices, noises, and other  
13 interference in the background of phone calls being made from her cellular devices.  
14

15 173. To this day, Jane Doe #1 continues to be threatened, harassed, stalked, and  
16 surveilled.  
17

18 **(Plaintiff Marie Bobette Riales' Background with**  
19 **Scientology and Danny Masterson)**

20 174. Plaintiff Marie Bobette Riales (hereinafter Plaintiff Riales) met Daniel Masterson  
21 in 2002 at a party in Palm Beach, Florida. They soon began dating and spending all their time  
22 together.

23 175. Plaintiff Riales never became involved with the Church of Scientology but was  
24 aware that Masterson was a Scientologist.

25 176. Plaintiff Riales noticed that whenever Defendant Masterson would make or serve  
26 her drinks she would black out frequently and wake up unable to remember anything about the  
27 night before.  
28



1 177. Plaintiff Riales eventually realized that this was likely caused by Masterson  
2 drugging her drinks so that he could sexually assault her.

3 178. On or around June 22, 2003, Plaintiff Riales attended an awards ceremony with  
4 Masterson in Toronto, Canada. That night, Plaintiff Riales woke up in their hotel room to find  
5 Masterson having sex with her. She felt incapacitated and fell in and out of consciousness during  
6 the assault.

7 179. The following morning she had swollen and sore genitals and no recollection of  
8 how she received the injuries.

9 180. Masterson continued to sexually assault Plaintiff Riales in a similar manner  
10 throughout their relationship.

11 181. On numerous occasions when Plaintiff Riales spent the night with Masterson,  
12 whether it was at his home in California, his homes elsewhere, or in hotels while traveling,  
13 Plaintiff Riales would wake up to Masterson having sex with her.

14 182. Sometimes during these assaults, Plaintiff Riales would attempt to push Masterson  
15 off of her, but she could often barely move her arms from being so weak and disoriented.

16 183. If Plaintiff Riales succeeded in raising her arms enough to push Masterson, he  
17 would just push her arms back down on the bed and continue assaulting her.

18 184. Defendant Masterson assaulted Plaintiff Riales almost nightly until the end of their  
19 relationship.

20 185. Plaintiff Riales stopped seeing Masterson in 2004.

21 **(The Institutional Defendants's Fair Gaming Campaign Against Plaintiff Riales)**

22 186. In April of 2017, Plaintiff Riales reported the assault to the Los Angeles Police  
23 Department. Once Plaintiff Riales spoke to police, Defendants' began an intense fair gaming  
24 campaign against her.  
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1 187. Upon information and belief, all the following-described acts of harassment,  
2 surveillance, and/or stalking were carried out by or at the direction of Defendants' employees,  
3 agents, and/or representatives.

4 188. Since going to the police, the Defendants have repeatedly stolen Plaintiff Riales's  
5 trash.

6 189. The Defendants have frequently and consistently followed and surveilled her.

7  
8 190. Plaintiff Riales's food truck that she owned and operated was vandalized by  
9 Defendants' agents. On more than one occasion unknown individuals attempted to break into her  
10 food truck. There were also false reviews posted about her food truck business. An unknown  
11 individual or individuals attempted to list her food truck for sale.

12 191. Plaintiff Riales's neighbor observed a man in her driveway taking pictures of  
13 Plaintiff Riales's food truck, car, license plates, and home. Plaintiff Riales's neighbor confronted  
14 him, and he fled.

15  
16 192. That night, at approximately 1:00 a.m., the window to a room where Plaintiff  
17 Riales's 13 year-old child slept was shattered.

18 193. On at least one occasion Plaintiff Riales has confronted men standing on her  
19 property taking pictures of her home. The men flee when confronted.

20 194. On one occasion, shortly after speaking with police, Plaintiff Riales was at a  
21 restaurant with friends when the table next to her began taunting Plaintiff Riales by talking loudly  
22 of anal sex and rape. When Plaintiff Riales left the restaurant, the table left and followed her to her  
23 car.  
24

25 195. On several occasions, Plaintiff Riales found all the doors of her car were opened.  
26  
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28

1            196. In July of 2018, Plaintiff Riales went on vacation with her children to Rehoboth  
2 Beach, Delaware. Every evening Plaintiff Riales observed people on a nearby balcony taking  
3 photos of her.

4            197. In and around September of 2018, Defendants' agent, Scientologist Kathy Gold,  
5 started publicly threatening Plaintiffs and their families. Gold threatened to commit serious and  
6 violent crimes against Plaintiffs including murder. Gold accused Plaintiffs of being religious  
7 bigots and liars.

8            198. Since December of 2018 through the present, Plaintiff Riales has observed people  
9 outside her home at all hours who would remain near her property and watch her. If Plaintiff  
10 Riales left her property, they would follow. Additionally, on many occasions, Plaintiff Riales has  
11 been followed by strangers throughout her town or to the homes of her friends and family. Plaintiff  
12 Riales' phone and computer have been hacked repeatedly, and she has experienced technological  
13 issues with various devices she has purchased. Various accounts belonging to her, including her  
14 email account, have been hacked.  
15

16  
17            **(Plaintiff Jane Doe #2's Background with Scientology and Danny Masterson)**

18            199. Jane Doe #2 became a member of the Church of Scientology when she was a child.

19            200. Jane Doe #2 became close friends with Daniel Masterson's brother, Chris, and  
20 eventually met Masterson through mutual friends and her auditing at CCI.

21            201. Years after beginning her auditing at CCI, Jane Doe #2 was living with Ilaria  
22 Urbinati, who she had met through the Church of Scientology. Urbinati invited Jane Doe #2 to  
23 join her for an evening with Masterson and Masterson's friend Luke Watson. This was the first  
24 time Jane Doe #2 spent any significant time with Masterson in a small group.  
25

26            202. At the end of the evening Defendant Masterson requested Jane Doe #2's phone  
27 number, which she gave him.  
28

1           203. A few days later, Jane Doe #2 met Masterson at his home. Immediately upon her  
2 arrival he served her a drink. Masterson demanded that Jane Doe #2 remove her clothes and get  
3 into his Jacuzzi tub. Jane Doe #2 felt the effects of the alcohol Masterson had provided but at a far  
4 faster rate than she had ever experienced. Masterson began to remove Jane Doe #2's clothes and  
5 enticed her into the Jacuzzi tub. Masterson also began kissing Jane Doe #2.

6           204. Next, Masterson demanded that Jane Doe #2 go into his shower. Masterson ushered  
7 her to the upstairs of his home.

8           205. Masterson then sexually assaulted Jane Doe #2 in the shower and in his bedroom.

9           206. Jane Doe #2 could not have, and in fact did not consent to sex with Defendant  
10 Masterson. Defendant Masterson knew she did not consent and sexually assaulted her  
11 nonetheless.

12           207. At the time it occurred, Jane Doe #2 only confided in two friends about the sexual  
13 assault, and she soon began withdrawing from Scientology. Jane Doe #2 understood from her  
14 Scientology coursework that she would not be permitted to report the assault to civil authorities  
15 outside of Scientology. She also understood that reporting the assault to Scientology would not  
16 result in any action being taken except to shame and harass her.

17           208. The Church attempted to draw Jane Doe #2 back in by offering her free auditing  
18 sessions, but by 2004 she ceased practicing Scientology completely.

19           209. Jane Doe #2 did not experience persistent harassment or stalking from the Church  
20 at first because she had not spoken openly about being sexually assaulted by Masterson and  
21 otherwise remained quiet about her history with Scientology.

22           210. In 2011, Jane Doe #2 disclosed to Masterson's former personal assistant, Brie  
23 Shaffer, that Masterson had sexually assaulted her because she believed that Shaffer was no longer  
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1 associating with Masterson. Soon after the disclosure many Scientologists began to disconnect  
2 from Jane Doe #2.

3 **(The Institutional Defendant's Fair Gaming Campaign Against Jane Doe #2)**

4 211. In 2017, Jane Doe #2 disclosed the assault to the Los Angeles Police Department.  
5 Since speaking with police, Defendants have subjected Jane Doe #2 to a fair gaming campaign to  
6 silence Jane Doe #2.

7 212. Upon information and belief, all the following-described acts of harassment,  
8 surveillance, and/or stalking were carried out by or at the direction of Defendants' employees,  
9 agents, and/or representatives.

10 213. Jane Doe #2 has experienced substantial issues with her cell phone and computer  
11 which suggest that her phone and computer may have been hacked or otherwise compromised.  
12 During phone calls wherein she discussed the abuse, she heard beeping, interference, or the calls  
13 would abruptly drop.

14 214. Jane Doe #2 repeatedly received phone calls and text messages from numbers  
15 associated with the Sea Org. She frequently received voicemails from Defendants' agents urging  
16 her to call them to get involved with Scientology. The text messages urged Jane Doe #2 to return  
17 to Scientology to help her cope with the death of her father by suicide. Her father's death had  
18 occurred years earlier.

19 215. Jane Doe #2 has experienced vandalism of her car. In these instances, there were no  
20 other cars surrounding hers that were vandalized, demonstrating the vandalism was targeted at  
21 Jane Doe #2.

22 216. Jane Doe #2 has been harassed via social media by Defendants' agents including  
23 being accused of serious criminal offenses.  
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1 217. In January of 2017, Jane Doe #2 was at a grocery store when Urbanati, who had  
2 since become a business partner of Defendant Masterson's, approached Jane Doe #2 and told Jane  
3 Doe #2 that Leah Remini was putting Jane Doe #2 "up to this," and asked why Jane Doe #2 and  
4 Plaintiff Bixler were "doing this to Danny?" She went on to attempt to interrogate Jane Doe #2  
5 about the facts of her sexual assault and tell Jane Doe #2 that no one believed her account and that  
6 Plaintiff Bixler was "insane."

7  
8 218. In and around September of 2018, Defendants' agent, Scientologist Kathy Gold,  
9 started publicly threatening Plaintiffs and their families. Gold threatened to commit serious and  
10 violent crimes against Plaintiffs including murder. Gold accused Plaintiffs of being religious  
11 bigots and liars.

12 219. On March 8, 2019, Jane Doe #2 made a post to social media in which she called on  
13 the FBI to investigate Scientology. In the days immediately following, Defendants' agents had  
14 approximately \$4,000.00 of merchandise delivered to Jane Doe #2's house from Victoria Secret  
15 and vitamin suppliers using her credit card. She also had a series of fraudulent transactions within  
16 her bank account that she was not making.  
17

18 220. From the time Jane Doe #2 disclosed the assault to law enforcement through the  
19 present, Jane Doe #2 has been stalked, harassed, and intimidated by Defendants who seek to  
20 silence her and in retaliation for reporting her abuse.

21 221. As a result of the harassment she has suffered, Jane Doe #2 has rarely left the house  
22 in the two years since reporting the sexual assault to law enforcement.  
23

24 **FIRST CAUSE OF ACTION**  
25 **(Stalking—Civil Code § 1708.7)**

26 222. Plaintiffs incorporate and reference the averments contained above as though fully  
27 set forth herein.  
28

1           223. Defendants stalked Plaintiffs and engaged in the pattern of conduct outlined above  
2 with the intent to follow, alarm, place under surveillance, and harass the Plaintiffs.

3           224. Defendants followed Plaintiffs online and in person per their codified "Fair Game"  
4 practices, thus placing Plaintiffs under surveillance with the intent to alarm, threaten, and harass  
5 Plaintiffs.

6           225. As a result of Defendants' conduct, Plaintiffs reasonably feared for their safety and  
7 the safety of their immediate family, and Plaintiffs suffered substantial emotional distress. The  
8 Defendants' pattern of conduct outlined above would cause a reasonable person to suffer  
9 substantial emotional distress.  
10

11           226. Defendants made credible threats against the Plaintiffs with the intent to cause the  
12 Plaintiffs and their immediate family members to fear for their safety and/or with reckless  
13 disregard for the safety of the Plaintiffs and their immediate family members.

14           227. Plaintiffs demanded the Defendants cease their behavior. The Defendants persisted  
15 in their pattern of conduct and warned Plaintiffs that further public complaints about them would  
16 only increase the severity of their fair gaming campaign.  
17

18           228. Any further attempts to clearly and definitively demand the Defendants cease their  
19 behavior were impractical and/or unsafe due to the power exerted by the Defendants over  
20 Plaintiffs and the Defendants intractable position on the Plaintiffs being "fair game" for their  
21 tactics.

22           229. Defendants knowingly and willfully conspired and agreed among themselves to:  
23 (1) obstruct justice by withholding the facts of Masterson's sexual assaults from civil authorities;  
24 (2) stalk Plaintiffs; (3) physically and constructively invade the Plaintiffs' privacy (see below);  
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1 and/or (4) intentionally inflict emotional distress upon Plaintiffs (see below). The conspiracy  
2 continues to this day.<sup>22</sup>

3 230. In furtherance of said conspiracy and agreement, Defendants engaged in wrongful  
4 conduct, including but not limited to information suppression, coercion, deception, stalking,  
5 harassment, surveillance, threats, vandalism, theft, and/or fraud.

6 231. Defendants' actions, set forth in the preceding paragraphs and incorporated herein,  
7 were in violation of the rights of Plaintiffs and committed in furtherance of the aforementioned  
8 conspiracies and agreements. Moreover, each of the aforementioned Defendants lent aid and  
9 encouragement and knowingly financed, ratified, and/or adopted the acts of the other. As a  
10 proximate result of the wrongful acts herein alleged, Plaintiffs have suffered significant damage to  
11 be determined at trial.

12 232. These acts constituted malicious conduct which was carried on by said Defendants  
13 with willful and conscious disregard for Plaintiffs' rights with the intention of willfully concealing  
14 information that could have prevented sexual assaults against Plaintiffs Chrissie Bixler, Marie  
15 Riales, Jane Doe #1, Jane Doe #2, or others yet unknown, as well as harassing and silencing  
16 Plaintiffs. The conduct at issue was and continues to be despicable and has and continues to  
17 subject Plaintiffs to a cruel and unjust hardship and justifies an award of exemplary and punitive  
18 damages. Accordingly, punitive damages should be awarded against Defendants to punish them  
19 and deter them and other such persons from committing such wrongful and malicious acts in the  
20 future.

21 233. These acts constituted malicious conduct which was carried on by said Defendants  
22 with willful and conscious disregard for Plaintiffs' rights with the intention of willfully concealing  
23 information that could have prevented sexual assaults against Plaintiffs Chrissie Bixler, Marie  
24  
25  
26

27  
28 <sup>22</sup> Paragraphs 230 through 232 are herein realleged and apply to each and every Cause of Action.

1 Riales, Jane Doe #1, Jane Doe #2, or others yet unknown, as well as harassing and silencing  
2 Plaintiffs. The conduct at issue was and continues to be despicable and has and continues to  
3 subject Plaintiffs to a cruel and unjust hardship and justifies an award of exemplary and punitive  
4 damages. Accordingly, punitive damages should be awarded against Defendants to punish them  
5 and deter them and other such persons from committing such wrongful and malicious acts in the  
6 future.

7  
8 234. Wherefore, Plaintiffs pray for judgment against Defendants in the form of all  
9 general and special damages in a sum to be proven at trial, and exemplary and punitive damages as  
10 allowed by law and in a sum to be proven at trial.

11 **SECOND CAUSE OF ACTION**  
12 **(Physical Invasion of Privacy—Civ. Code § 1708.8)**

13 235. Plaintiffs incorporate and reference the averments contained above as though fully  
14 set forth herein.

15 236. As stated above, Defendants and their agents placed Plaintiffs under surveillance  
16 and in doing so, trespassed on their property to take photos, looked in Plaintiffs' windows, and  
17 electronically compromised their security systems, and/or phones, and/or computers, and/or other  
18 digital devices.

19 237. Defendants committed the aforementioned trespass in a highly offensive and  
20 unreasonable manner, without permission and with the intention of harming Plaintiffs and  
21 interfering in their private affairs and/or intruding upon Plaintiffs' privacy and/or capturing visual  
22 images, video recording, or sound recording of Plaintiffs engaging in private, personal, and/or  
23 familial activities.

24  
25 238. As a result of Defendants' conduct, the Plaintiffs reasonably feared for their safety  
26 and the safety of their family, and Plaintiffs suffered substantial emotional distress.  
27  
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08/22/2019

1 239. These acts constituted malicious conduct which was carried on by said Defendants  
2 with willful and conscious disregard for Plaintiffs' rights with the intention of willfully concealing  
3 information that could have prevented sexual assaults against Plaintiffs Chrissie Bixler, Marie  
4 Riales, Jane Doe #1, Jane Doe #2, or others yet unknown, as well as harassing and silencing  
5 Plaintiffs. The conduct at issue was and continues to be despicable and has and continues to  
6 subject Plaintiffs to a cruel and unjust hardship and justifies an award of exemplary and punitive  
7 damages. Accordingly, punitive damages should be awarded against Defendants to punish them  
8 and deter them and other such persons from committing such wrongful and malicious acts in the  
9 future.  
10

11 240. Wherefore, Plaintiffs pray for judgment against Defendants in the form of all  
12 general and special damages in a sum to be proven at trial, and exemplary and punitive damages as  
13 allowed by law and in a sum to be proven at trial.  
14

15 **THIRD CAUSE OF ACTION**  
16 **(Constructive Invasion of Privacy—Civil Code § 1708.8)**

17 241. Plaintiffs incorporate and reference the averments contained above as though fully  
18 set forth herein.

19 242. As stated above, Defendants and their agents placed Plaintiffs under surveillance  
20 and in doing so, used devices to capture image and sound recordings or other physical impressions  
21 which, because of such device's use, allowed Defendants to avoid trespassing upon Plaintiffs' land  
22 while still being able to capture such recordings and impressions.

23 243. Defendants, in a manner that is highly offensive and unreasonable, used a recording  
24 device with the intention of harming Plaintiffs by interfering in their private affairs and/or  
25 intruding upon Plaintiffs' privacy and/or capturing visual images, video recording, or sound  
26 recording of Plaintiff engaging in private, personal, and/or familial activities.  
27  
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08/22/2019

1           244. As a result of Defendants' conduct, Plaintiffs reasonably feared for their safety and  
2 the safety of their family, and Plaintiffs suffered substantial emotional distress.

3           245. These acts constituted malicious conduct which was carried on by said Defendants  
4 with willful and conscious disregard for Plaintiffs' rights with the intention of willfully concealing  
5 information that could have prevented sexual assaults against Plaintiffs Chrissie Bixler, Marie  
6 Riales, Jane Doe #1, Jane Doe #2 or others yet unknown, as well as harassing and silencing  
7 Plaintiffs. The conduct at issue was and continues to be despicable and has and continues to  
8 subject Plaintiffs to a cruel and unjust hardship and justifies an award of exemplary and punitive  
9 damages. Accordingly, punitive damages should be awarded against Defendants to punish them  
10 and deter them and other such persons from committing such wrongful and malicious acts in the  
11 future.  
12

13           246. Wherefore, Plaintiffs pray 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 as  
15 allowed by law and in a sum to be proven at trial.  
16

17                               **FOURTH CAUSE OF ACTION**  
18                               **(Intentional Infliction of Emotional Distress)**

19           247. Plaintiffs incorporate and reference the averments contained above as though fully  
20 set forth herein.

21           248. Defendants surveilled, harassed, stalked, and photographed Plaintiffs. Specifically,  
22 Defendants trespassed on Plaintiffs' personal property, looked in windows, followed and stalked,  
23 hacked personal online accounts and emails, engaged in surveillance of and interference with  
24 Plaintiffs' daily lives, and/or called, and/or texted, and/or otherwise attempted to communicate  
25 repeatedly.

26           249. Defendants' aforementioned conduct was extreme and outrageous.  
27  
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08/22/2019



1 caretaker, which services constitute a special damage to Plaintiff Bixler. The losses suffered by  
2 Plaintiff Cedric Bixler-Zavala were proximately caused by Defendants' tortious conduct, as  
3 described herein, through which his wife was tortuously injured.

4 256. Wherefore, Plaintiff Cedric Bixler-Zavala prays for judgment against Defendants in  
5 the form of all general and special damages in a sum to be proven at trial, and exemplary and  
6 punitive damages as allowed by law and in a sum to be proven at trial.

7  
8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of them as  
10 follows as to each cause of action:

- 11 1. For general damages;
- 12 2. For special damages and compensatory for medical, hospital, and incidental expenses;
- 13 3. For injunctive relief pursuant to Civil Code §§ 1770 and 1780(a) and (e);
- 14 4. For punitive/exemplary damages according to proof and pursuant to Civil Code §§  
15 1708.5(3)(b) and 1782(2);
- 16 5. For attorneys' fees and/or penalties pursuant to Civil Code §§ 1708.5(3)(b) and  
17 1782(2) and Civil Code §§ 51.7, 51, and 52.4, and Code of Civil Procedure § 1021.5;
- 18 6. For treble damages pursuant to California Penal Code §236.1 and California Civil  
19 Code § 52.5;
- 20 7. Pre -and post-judgment interest;
- 21 8. For costs of suit herein incurred; and
- 22 9. For such other and further relief as the Court may deem proper.

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08/22/2019

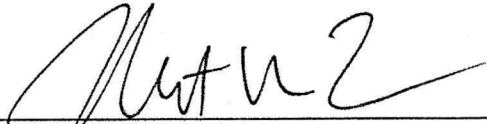
**JURY TRIAL DEMANDED**

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Plaintiffs hereby demand a trial by jury.

Dated: August 21, 2019

THOMPSON LAW OFFICES, P.C.

By: 

Robert W. Thompson  
Attorney for Plaintiffs CHRISSIE  
CARNELL BIXLER; CEDRIC BIXLER-  
ZAVALA; JANE DOE #1; MARIE  
BOBETTE RIALES; and JANE DOE #2

08/22/2019



## ATTACHMENT A

Below are additional attorneys representing Plaintiffs:

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<sup>1</sup> This address is solely for delivery purposes. It does not indicate support for any lawsuit or case by the University of Pennsylvania.