

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO. 23 CVS

SCOTT RILEY LASSITER,)
Plaintiff,)
v.)
TIMOTHY KEITH MOORE and)
JOHN DOE,)
Defendants.)

COMPLAINT
(JURY TRIAL DEMANDED)

NOW COMES the plaintiff, by and through his undersigned counsel of record, and
complaining of the defendants, alleges and says as follows:

INTRODUCTION

This case results from an egregious abuse of power by the defendant, Timothy Keith Moore (“Defendant Tim Moore”), current Speaker of the North Carolina House of Representatives, who engaged in an adulterous extramarital affair with the wife of the plaintiff, Scott Riley Lassiter (“Plaintiff”), for more than three years. Defendant Tim Moore used his position as one of the most powerful elected officials in North Carolina to entice Plaintiff’s wife, Jamie Liles Lassiter (“Mrs. Lassiter”), a mid-level employee of the state government, to participate in an illicit relationship with him. This was more than the ordinary dalliance of an unfaithful spouse and an unscrupulous paramour. Defendant Tim Moore’s intentional conduct with Mrs. Lassiter revealed a perverse form of symbiosis in which he persuaded her to engage in degrading acts to satisfy his desires, recognizing that Mrs. Lassiter hoped her acquiescence to his demands would result in Defendant Tim Moore supporting favorable action for the organization she

represents, the North Carolina Conference of Clerks of Superior Court (“NC Conference of Clerks”).

PARTIES

1. Plaintiff is a citizen and resident of Wake County, North Carolina.
2. Defendant Tim Moore is a citizen and resident of Cleveland County, North Carolina. However, as Speaker of the North Carolina House of Representatives, Defendant Tim Moore spends greater than fifty percent of his time in Wake County. Defendant Tim Moore also owns two residences in Wake County.
3. Defendant John Doe (“Defendant John Doe”) is an unidentified individual who, upon information and belief, conspired with Defendant Tim Moore in June 2023 to commit tortious and criminal acts against Plaintiff, as set out in more detail below, in Wake County, North Carolina. Although Defendant John Doe has yet to be identified, photos of Defendant John Doe entering upon Plaintiff’s front yard and porch in Cary, North Carolina without authorization on June 4, 2023 are attached hereto as **EXHIBIT A** and incorporated by reference herein.

FACTUAL BACKGROUND

4. On June 1, 2013, Plaintiff was lawfully married to Mrs. Lassiter. Plaintiff and Mrs. Lassiter (collectively, the “Lassiters”) lived continuously together as husband and wife in North Carolina from June 1, 2013 until they separated from each other on or about January 11, 2023 as a result of Defendant Tim Moore’s adulterous extramarital relationship with Mrs. Lassiter. Plaintiff and Mrs. Lassiter met in college and had been in a relationship with each other for more than ten years at the time of their separation.

5. Defendant Tim Moore willfully interfered in the marital relationship between Mrs. Lassiter and Plaintiff while Plaintiff and Mrs. Lassiter were happily married and living together in Wake County, North Carolina.

6. At the time Defendant Tim Moore began pursuing a sexual relationship with Mrs. Lassiter, Defendant Tim Moore was aware that Plaintiff and Mrs. Lassiter were happily married to each other and living together. In support of this allegation, Plaintiff shows the Court as follows:

- a. Defendant Tim Moore and Mrs. Lassiter worked together. In her capacity as the executive director of the NC Conference of Clerks, Mrs. Lassiter frequently interacted with Defendant Tim Moore to advocate for her organization. A photo of Defendant Tim Moore and Mrs. Lassiter together at a work event¹ in December 2022 is attached hereto as **EXHIBIT B** and incorporated by reference herein.
- b. Upon information and belief, Defendant Tim Moore saw Mrs. Lassiter consistently wearing a wedding band from the time that they began working together, prior to 2017, through January 11, 2023.
- c. Plaintiff, Mrs. Lassiter, and Defendant Tim Moore are all actively involved in the North Carolina Republican Party (“NCGOP”). The Lassiters attended many NCGOP functions as a couple and often interacted with Defendant Tim Moore at these events. As recently as December 12, 2022, Defendant Tim Moore attended

¹ This photo was posted on Facebook by Lexanne Huffman, Craven County Clerk of Superior Court (<https://www.facebook.com/huffmanforclerkofcourt>) on December 12, 2022 with the caption, “NC Speaker of the House, Tim Moore, stopped by to say hello. To his left is Jamie Lassiter, Executive Director of our NC Conference of Clerks.”

a holiday dinner at 42nd Street Oyster Bar in Raleigh, North Carolina with the Lassiters and other guests.

d. Plaintiff, Mrs. Lassiter, and Defendant Tim Moore have all been Facebook friends for more than five years. During the time that Defendant Tim Moore has been Facebook friends with Plaintiff and Mrs. Lassiter, the Lassiters frequently posted photos of themselves as a couple.

e. Defendant Tim Moore accepted campaign contributions from both Plaintiff and Mrs. Lassiter for his North Carolina House of Representatives election campaigns.

7. Beginning in 2019 and continuing through and beyond January 11, 2023, Defendant Tim Moore aggressively pursued a sexual relationship with Mrs. Lassiter, even though he knew that she was married to and living with Plaintiff.

8. Plaintiff discovered Defendant Tim Moore's affair with Mrs. Lassiter on December 21, 2022.

9. After hearing persistent rumors about an inappropriate relationship between Defendant Tim Moore and Mrs. Lassiter, which Mrs. Lassiter had repeatedly denied, Plaintiff surveilled Mrs. Lassiter on the evening of December 21, 2022, the Wednesday before Christmas and the beginning of her holiday vacation from work. She had told Plaintiff that she was going to a movie with one of her female friends. Instead of going to a movie, Mrs. Lassiter went to dinner with Defendant Tim Moore at Sullivan's Steakhouse in Raleigh, North Carolina. After dinner, Defendant Tim Moore drove Mrs. Lassiter, in the Lassiters' car, to his residence in Raleigh, where they spent hours together and, upon information and belief, had sexual intercourse. A photo of

Defendant Tim Moore and Mrs. Lassiter leaving Sullivan's Steakhouse together at approximately 11:00 p.m. that evening is attached hereto as **EXHIBIT C** and incorporated by reference herein.

10. When Mrs. Lassiter returned home in the early morning hours of December 22, 2022, much later than she had told Plaintiff she would be out for the movie, Plaintiff confronted her about her relationship with Defendant Tim Moore. Mrs. Lassiter tearfully confessed that she had been involved in an extramarital affair with Defendant Tim Moore for more than three years, that she had engaged in sexual activity with Defendant Tim Moore (including group sex with other individuals seeking Defendant Tim Moore's political favor), and that she feared ending the relationship with Defendant Tim Moore would result in losing her job.

11. Plaintiff insisted that Defendant Tim Moore meet with him so Plaintiff could confront him about the affair with Mrs. Lassiter. On December 26, 2022, Plaintiff and Defendant Tim Moore met at Biscuitville on Western Boulevard in Raleigh, North Carolina. When Plaintiff questioned Defendant Tim Moore, he admitted to having a multi-year sexual relationship with Mrs. Lassiter. Near the end of the meeting, Defendant Tim Moore asked Plaintiff "on a completely unrelated note" if there was anything he could do for Plaintiff, implying that he could use the power he held as Speaker in some way to benefit Plaintiff. Plaintiff angrily told Defendant Tim Moore that he did not want any political favors.

12. In the weeks following Plaintiff's discovery of Defendant Tim Moore's relationship with Mrs. Lassiter, the Lassiters attempted to work through the marital problems associated with Mrs. Lassiter's infidelity, including participating in religious and therapeutic counseling. Mrs. Lassiter was adamant that she wanted to save their marriage but could not end her relationship with Defendant Tim Moore for fear of retaliation. Mrs. Lassiter implored Plaintiff to allow her to

continue the relationship so her job, an at-will position that is statutorily created and directly funded by the North Carolina General Assembly, and the interests of the NC Conference of Clerks would not be adversely affected by Defendant Tim Moore's anticipated displeasure over a potential breakup. Mrs. Lassiter begged Plaintiff to understand that she had "gotten [herself] into something [she] couldn't get out of," referring to her relationship with Defendant Tim Moore. Plaintiff told Mrs. Lassiter that they could not remain married unless she ended her relationship with Defendant Tim Moore. Because Mrs. Lassiter said she was uncomfortable extricating herself from that relationship, Plaintiff and Mrs. Lassiter separated on January 11, 2023.

**FIRST CLAIM FOR RELIEF
(Criminal Conversation)**

13. Paragraphs 1 through 12 above are hereby realleged and incorporated by reference as if fully set forth herein.

14. Upon information and belief, beginning in or around 2019 and continuing through and beyond January 11, 2023, Defendant and Mrs. Lassiter were physically intimate, including kissing, having sexual intercourse, and engaging in other forms of sexual contact in North Carolina on multiple occasions at locations that include, but are not limited to, the following:

- a. Defendant Tim Moore's condominium in the PNC tower, located at 3301 Fayetteville Street, Unit 3305, Raleigh, North Carolina 27601; and
- b. Defendant Tim Moore's condominium, located at 700 Bishops Park Drive, Unit 106, Raleigh, North Carolina 27605.

15. Between 2019 and January 11, 2023, Defendant knowingly and willfully engaged in sexual intercourse with Mrs. Lassiter in North Carolina while Plaintiff and Mrs. Lassiter were lawfully married and not separated.

16. Plaintiff has been injured by Defendant Tim Moore's adulterous extramarital relationship with Mrs. Lassiter. Plaintiff's damages include, but are not limited to, the loss of support and companionship of Mrs. Lassiter, humiliation, injury to his reputation, and mental anguish resulting from the destruction of his marriage.

17. Plaintiff has been damaged by Defendant Tim Moore's adulterous extramarital relationship with Mrs. Lassiter in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00).

**SECOND CLAIM FOR RELIEF
(Alienation of Affections)**

18. Paragraphs 1 through 17 above are hereby realleged and incorporated by reference as if fully set forth herein.

19. Prior to Defendant Tim Moore's extramarital relationship with Mrs. Lassiter, Plaintiff and Mrs. Lassiter were happily married and genuine love and affection existed between them.

20. Upon information and belief, Defendant Tim Moore committed the following acts in North Carolina during the time period from 2019 through January 11, 2023, which acts were designed to alienate Mrs. Lassiter from Plaintiff:

- a. Defendant Tim Moore used his position as Speaker of the North Carolina House of Representatives to initiate contact and develop a personal relationship with Mrs. Lassiter, despite knowing that she was married to Plaintiff.
- b. Defendant Tim Moore engaged in sexual intercourse with Mrs. Lassiter on many occasions over multiple years, despite knowing that Mrs. Lassiter was married to Plaintiff.

- c. Defendant Tim Moore convinced Mrs. Lassiter to engage in degrading sexual acts with him, including group sexual activity with others over whom he had power or influence.
- d. Defendant Tim Moore called and sent text messages and emails to Mrs. Lassiter, including with his state government phone,² when he knew that she was home with Plaintiff in order to interfere with Mrs. Lassiter's time with her husband and alienate her from Plaintiff.
- e. Defendant Tim Moore persuaded Mrs. Lassiter to lie to Plaintiff regarding her whereabouts so that she would sacrifice time with Plaintiff to spend time with him.
- f. Defendant Tim Moore made statements to Mrs. Lassiter that caused her to believe her job and the position of the NC Conference of Clerks would be adversely affected if she ended their relationship.

21. Defendant Tim Moore's wrongful and malicious acts deprived Plaintiff of Mrs. Lassiter's love, society, companionship, and consortium and proximately caused the marital separation of Plaintiff and Mrs. Lassiter.

22. As a result of Defendant Tim Moore's wrongful and malicious actions, the genuine love and affection that existed between Plaintiff and Mrs. Lassiter was alienated and destroyed.

23. Plaintiff has been injured by Defendant Tim Moore's wrongful and malicious acts, which resulted in the destruction of his marriage to Mrs. Lassiter.

² A notice to preserve all forms of potential evidence was sent to and, upon information and belief, received by Defendant Tim Moore on April 20, 2023.

24. Plaintiff has been damaged by Defendant Tim Moore's alienation of Mrs. Lassiter's affections in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00).

**THIRD CLAIM
(Civil Conspiracy)**

25. Paragraphs 1 through 24 above are hereby realleged and incorporated by reference as if fully set forth herein.

26. Upon information and belief, a conspiracy existed between Defendant Tim Moore and Defendant John Doe to commit wrongful, malicious acts to interfere with Plaintiff's rights to exclusive use, possession, and control of his real and personal property and to intrude upon Plaintiff's seclusion as set out below in paragraphs 32 through 51.

27. Upon information and belief, Defendant Tim Moore and Defendant John Doe had an agreement to engage in unlawful actions. Upon information and belief, Defendants agreed on a course of action to interfere with and intimidate Plaintiff to prevent him from pursuing his valid legal claims against Defendant Tim Moore.

28. Upon information and belief, Defendant Tim Moore, either personally or through an agent authorized to act on his behalf, requested that Defendant John Doe unlawfully enter upon Plaintiff's real property and place a motion-activated camera on Plaintiff's the property to capture photos and videos of Plaintiff that Defendant Tim Moore could use to persuade Plaintiff not to pursue any of the valid legal claims against him.

29. In furtherance of Defendants' agreement to engage in unlawful actions against Plaintiff as set out herein below, Defendant John Doe trespassed upon Plaintiff's real property on multiple occasions, intruded upon Plaintiff's seclusion, trespassed upon Plaintiff's personal property, and converted Plaintiff's personal property to his own use.

30. Defendants' wrongful actions pursuant to their agreement interfered with Plaintiff's property rights and his right to privacy and caused damage to Plaintiff as set out herein.

31. Plaintiff has been injured by Defendants' wrongful acts done in furtherance of their conspiracy, and Defendant Tim Moore and Defendant John Doe should be jointly and severally liable for the damage caused to Plaintiff.

**FOURTH CLAIM
(Trespass to Real Property)**

32. Paragraphs 1 through 31 above are hereby realleged and incorporated by reference as if fully set forth herein.

33. At all times since January 11, 2023, Plaintiff has resided at 209 Ronaldsby Drive, Cary, North Carolina 27511 ("209 Ronaldsby Drive"), a home that Plaintiff formerly shared with Mrs. Lassiter.

34. As the sole occupant of 209 Ronaldsby Drive, since January 11, 2023, Plaintiff has been entitled to exclusive possession, use, and control this property. Plaintiff has, and at all relevant times has had, either actual or constructive possession of 209 Ronaldsby Drive.

35. On multiple occasions, Defendant John Doe made unlawful and unauthorized entries upon the property located at 209 Ronaldsby Drive, including, but not limited to, the following:

- a. At approximately 3:18 a.m. on June 1, 2023, Defendant John Doe unlawfully and without authorization entered upon the property to surreptitiously install a motion-activated camera to capture photos and video recordings of Plaintiff without Plaintiff's consent. Defendant John Doe installed the camera on a tree in Plaintiff's yard at an angle facing Plaintiff's house so that it could, upon information and

belief, capture photos and video recordings of events inside and outside Plaintiff's home.

- b. On June 4, 2023, Defendant John Doe unlawfully and without authorization entered upon the property, went onto Plaintiff's porch, and looked around Plaintiff's home without Plaintiff's consent.
- c. At approximately 3:15 a.m. on June 7, 2023, Defendant John Doe unlawfully and without authorization entered upon the property to retrieve the camera that he had installed on the property on June 1, 2023. When Plaintiff discovered the camera on his property and saw Defendant John Doe installing it on his security camera footage, Plaintiff replaced the camera installed by John Doe with a similar one of his own ("Plaintiff's Camera"), which was motion-activated and connected to Plaintiff's wireless network such that it would capture photos and video recordings and save them to cloud storage. Defendant John Doe realized that the camera he installed on Plaintiff's property had been replaced, attempted to destroy Plaintiff's Camera, and then removed Plaintiff's Camera from the property. A photo of Defendant John Doe taken by Plaintiff's Camera on June 7, 2023 is attached hereto as **EXHIBIT D** and incorporated by reference herein.

36. Defendant John Doe's unauthorized entries upon Plaintiff's property, particularly those that occurred in the middle of the night, are deeply unsettling.

37. Plaintiff has been damaged as a proximate result of Defendant John Doe's unauthorized entries upon the land located at 209 Ronaldsby Drive.

**FIFTH CLAIM
(Trespass to Personal Property)**

38. Paragraphs 1 through 37 above are hereby realleged and incorporated by reference as if fully set forth herein.

39. Plaintiff has, and at all relevant times has had, actual or constructive possession of Plaintiff's Camera.

40. Without justification, authority, or lawful excuse, Defendant John Doe interfered with Plaintiff's right to possession of Plaintiff's Camera.

41. Plaintiff has attempted, through the Cary Police Department, to regain actual possession of Plaintiff's Camera.

42. Plaintiff has been damaged by Defendant John Doe's trespass to his personal property.

**SIXTH CLAIM
(Conversion)**

43. Paragraphs 1 through 42 above are hereby realleged and incorporated by reference as if fully set forth herein.

44. At the time Defendant John Doe came into actual possession of Plaintiff's Camera, Plaintiff was the lawful owner of this property and was entitled to immediate possession of the property.

45. Defendant John Doe converted Plaintiff's Camera to his own use. Defendant John Doe has excluded Plaintiff from exercising his rights of ownership over this property and has either retained, destroyed, or disposed of Plaintiff's personal property without authorization.

46. Plaintiff has been damaged by Defendant John Doe's conversion of his personal property.

**SEVENTH CLAIM
(Intrusion Upon Seclusion)**

47. Paragraphs 1 through 46 above are hereby realleged and incorporated by reference as if fully set forth herein.

48. Upon information and belief, the motion-activated camera installed by Defendant John Doe at 209 Ronaldsby Drive on June 1, 2023 was intended to capture photo and video recordings of Plaintiff. Because the camera was installed on Plaintiff's property, it was intended to capture photos and videos of private activities of Plaintiff that would not be visible by the naked eye of an individual viewing Plaintiff's property from a public area.

49. Defendant John Doe's unauthorized attempts to capture photos and videos of Plaintiff's private activities is a highly offensive invasion of Plaintiff's privacy.

50. Defendant John Doe's invasion of Plaintiff's privacy constitutes an unlawful and tortious intrusion upon Plaintiff's seclusion.

51. Plaintiff has been damaged by Defendant John Doe's invasion of his privacy. Plaintiff has experienced profound anxiety as a result of his discovery that Defendant John Doe attempted to capture photos and video recordings of his private activities without his knowledge.

PUNITIVE DAMAGES

52. Paragraphs 1 through 51 above are hereby realleged and incorporated by reference as if fully set forth herein.

53. Defendant Tim Moore engaged in willful and wanton conduct that was intended to interfere with, and did actually interfere with, Plaintiff's marital relationship with Mrs. Lassiter.

54. Defendant Tim Moore and Defendant John Doe engaged in malicious and willful and wanton conduct that was intended to interfere with, and did actually interfere with, Plaintiff's property rights and his right to privacy.

55. Defendant Tim Moore had actual knowledge that Mrs. Lassiter was married to Plaintiff. Notwithstanding the fact that Mrs. Lassiter and Plaintiff were married to each other, Defendant Tim Moore willfully pursued a sexual relationship with Mrs. Lassiter for his own gain and with reckless disregard of the destruction he was causing to Plaintiff's marriage.

56. Defendant Tim Moore possessed an ill will towards Plaintiff. Upon information and belief, Defendant Tim Moore resented Plaintiff and was willing to engage in unlawful conduct, through the hiring of and/or cooperation with Defendant John Doe, to intimidate Plaintiff and demonstrate Defendant Tim Moore's power for reasons that include preventing Plaintiff from asserting lawful claims against him. Additionally, Defendant Tim Moore was furious at Plaintiff, because he believed that Plaintiff's pursuit of his lawful claims against Defendant Tim Moore could thwart Defendant Tim Moore's political ambitions. In an effort to cover up Defendant Tim Moore's unlawful conduct with Mrs. Lassiter, upon information and belief, Defendant Tim Moore and Defendant John Doe willfully and wantonly interfered with Plaintiff's property rights and right to privacy by entering upon Plaintiff's property in the middle of the night and installing equipment intended to surreptitiously record Plaintiff's private actions in his own home.

57. The actions of Defendants described herein above were malicious, willful and wanton, atrocious, and with reckless indifference to the rights and wellbeing of Plaintiff.

58. Plaintiff is entitled to recover punitive damages from Defendant Tim Moore and Defendant John Doe in accordance with N.C. Gen. Stat. § 1D-15.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court grant the following relief:

1. Award Plaintiff compensatory damages in excess of \$25,000.00 against Defendant Tim Moore on Plaintiff's claim for criminal conversation;
2. Award Plaintiff compensatory damages in excess of \$25,000.00 against Defendant Tim Moore on Plaintiff's claim for alienation of affections;
3. Award Plaintiff compensatory damages in excess of \$25,000.00 against Defendant Tim Moore and Defendant John Doe, jointly and severally, on Plaintiff's claim for trespass to real property;
4. Award Plaintiff compensatory damages in excess of \$25,000.00 against Defendant Tim Moore and Defendant John Doe, jointly and severally, on Plaintiff's claim for trespass to personal property;
5. Award Plaintiff compensatory damages in excess of \$25,000.00 against Defendant Tim Moore and Defendant John Doe, jointly and severally, on Plaintiff's claim for conversion of Plaintiff's property;
6. Award Plaintiff compensatory damages in excess of \$25,000.00 against Defendant Tim Moore and Defendant John Doe, jointly and severally, on Plaintiff's claim for intrusion upon seclusion;
7. Award Plaintiff punitive damages in excess of \$25,000.00 to punish Defendant Tim Moore;
8. Award Plaintiff punitive damages in excess of \$25,000.00 to punish Defendant John Doe;
9. Allow a jury trial on all issues so triable;

10. Tax the costs of this action against Defendants; and
11. Grant Plaintiff such other and further relief as the Court deems just and proper.

This the 18th day of June, 2023.

**SMITH DEBNAM NARRON DRAKE
SAINTSING & MYERS, L.L.P.**

ATTORNEYS FOR PLAINTIFF



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Texas
STATE OF ~~NORTH CAROLINA~~
COUNTY OF Harris

VERIFICATION

I, SCOTT RILEY LASSITER, do hereby affirm, depose, and state that I am the Plaintiff herein, that I have read the foregoing Complaint and know the statements therein to be true of my own personal knowledge, except for those matters alleged upon information and belief, and as to those matters, I believe them to be true.

This the 18th day of June, 2023.

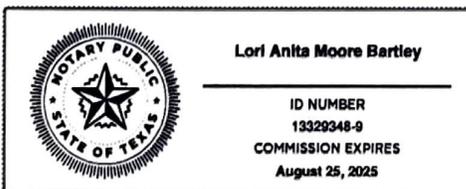
 06/18/2023

SCOTT RILEY LASSITER

Sworn and subscribed
before me this 18th day
of June, 2023.

 06/18/2023
Notary Public Lori Anita Moore Bartley

My Commission expires: 08/25/2025



Notarized online using audio-video communication

EXHIBIT A



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EXHIBIT B



EXHIBIT C





EXHIBIT D