

1 **COMP**
2 Todd L. Moody (5430)
3 Piers R. Tueller (14633)
4 HUTCHISON & STEFFEN, PLLC
5 Peccole Professional Park
6 10080 West Alta Drive, Suite 200
7 Las Vegas, NV 89145
8 Tel: (702) 385-2500
9 Fax: (702) 385-2086
10 tmoody@hutchlegal.com
11 ptueller@hutchlegal.com

CASE NO: A-24-895007-C
Department 4

8 Dominic Gentile (1923)
9 CLARK HILL PLC
10 1700 S. Pavilion Center Drive, Ste. 500
11 Las Vegas, NV 89135
12 Tel: (702) 697-7543
13 Fax: (702) 778-9709
14 dgentile@clarkhill.com

15 *Attorneys for Plaintiff Jon Lee*

16 **DISTRICT COURT**
17 **CLARK COUNTY, NEVADA**

18 JOHN LEE, an individual,
19 Plaintiff,

CASE NO.:

DEPT. NO.:

20 v.

21 LOU COLAGIOVANNI, an individual;
22 COMMITTEE TO ELECT DAVID FLIPPO, a
23 principal campaign committee, DAVID
24 FLIPPO, an individual; DOES 1-10, inclusive;
25 AND ROE ENTITIES 11-20, inclusive,
26 Defendants.

COMPLAINT

27 Plaintiff John Lee, ("Mr. Lee" or "Plaintiff") for his Complaint against defendants Lou
28 Colagiovanni ("Colagiovanni"), Committee to Elect David Flippo ("CTEDF"), and David
Flippo ("Flippo") (collectively "Defendants"), hereby complains and alleges as follows:

1 **PARTIES & JURISDICTION**

2 1. Plaintiff is and was at all times relevant to the allegations herein is a resident of
3 Clark County, Nevada.

4 2. Defendant Lou Colagiovanni is and was at all times relevant to the allegations
5 herein is a resident of Clark County, Nevada.

6 3. Defendant Committee to Elect David Flippo is and was at all times relevant to
7 the allegations herein a principal campaign committee, and did business in Clark County,
8 Nevada

9 4. Defendant David Flippo is and was at all times relevant to the allegations herein
10 is a resident of Clark County, Nevada.

11 5. There may be other persons or entities, whether individuals, corporations,
12 associations, or otherwise, who are or may be legally responsible for the acts, omissions,
13 circumstances, happenings, and/or the damages or other relief requested by this Complaint.
14 The true names and capacities of Does 1 through 10 and Roes Entities 11 through 20 are
15 unknown to Plaintiffs, who sue those defendants by such fictitious names. Plaintiffs will seek
16 leave of this Court to amend this Complaint to insert the proper names of the Doe and Roe
17 defendants when such names and capacities become known to Plaintiffs.

18 6. This Court has subject matter jurisdiction over this matter in accordance with
19 Nev. Const. Art. VI, § 6, as this Court has original jurisdiction in all cases not assigned to
20 justice courts.

21 7. The Court has personal jurisdiction over the parties and Clark County is a
22 proper venue. Defendants conduct business in Clark County, Nevada.

23 8. All actions and events supporting the claims set forth herein occurred in Clark
24 County, Nevada.

25 9. This Court also has jurisdiction over each defendant named in the Complaint
26 because each defendant is a legal entity or an individual, who or which has sufficient minimum
27 contacts with the State of Nevada to render the exercise of jurisdiction by Nevada courts
28 permissible under traditional notions of fair play and substantial justice.

1 10. The Court has subject matter jurisdiction over this matter because it is one for
2 equitable relief, and pursuant to NRS 4.370(1) the matter in controversy exceeds \$15,000.00,
3 exclusive of interest, fees, and costs.

4 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

5 11. Mr. Lee is a political candidate for Nevada Congressional District 4.

6 12. Flippo is also a political candidate for Nevada Congressional District 4.

7 13. Flippo manages his congressional campaign via CTEDF.

8 14. On or around June 5, 2024, the website <https://therealjohnlee.com> (the
9 “Website”) went live, falsely accusing Mr. Lee of certain sexually deviant behavior.

10 15. The Website claimed that Mr. Lee attempted to engage in certain deviant
11 behavior that had been “caught” in an audio file.

12 16. The Website included that audio file, which is approximately 25 minutes in
13 duration and contains two voices: a male voice and a female voice.

14 17. Mr. Lee is not the male voice in the audio file.

15 18. The audio file is a “deepfake”; i.e., it was digitally altered to make it appear to
16 sound like Mr. Lee to spread false information.

17 19. Nevertheless, it has been held out that Mr. Lee was the male voice in the audio
18 file.

19 20. The Website contains no external links or citations in support of the claims
20 contained therein, as this audio file is a total fabrication, and thus no such citation exists.

21 21. The Website’s domain name was purchased via NameCheap Inc.
22 (namecheap.com) on June 5, 2024.

23 22. Upon information and belief, in or around December 2023, agents for Mr. Lee’s
24 political campaign met with agents of Flippo and CTEDF (“December 2023 Meeting”).

25 23. Upon information and belief, during the December 2023 Meeting, Flippo and
26 CTEDF admitted that they listened to and had access to the audio file contained on the
27 Website.

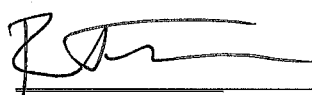
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1. For compensatory damages in excess of \$15,000.00;
2. For punitive damages in an amount to be determined at trial;
3. For reasonable attorneys' fees and costs;
4. For pre and post-judgment interest on all sums award according to proof at the maximum legal rate; and
5. For such other and further relief the court deems just and proper.

DATED this 10TH day of June, 2024.

HUTCHISON & STEFFEN, PLLC



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tmoody@hutchlegal.com
ptueller@hutchlegal.com

Dominic Gentile (1923)
CLARK HILL PLC
1700 South Pavilion Center Drive, Suite 500
Las Vegas, NV 89135
dgentile@clarkhill.com

Attorneys for Plaintiff John Lee