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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

JANE DOE,

Plaintiff,

v.

CISSY STEELE, AKA CISSY GERALD;
DIABOLIC VIDEO PRODUCTIONS, INC.;
BLACK ICE LTD.; ZERO TOLERANCE
ENTERTAINMENT, INC.; THIRD
DEGREE FILMS; ELEGANT ANGEL,
INC.; KNPB MEDIA B.V; 24-7 INTERNET,
INC; TUBEXXXONE.COM; WREAL, LLC;
AV ENTERTAINMENT, INC;
ASEXBOX.COM; AND EXCALIBUR
FILMS, LTD.

Defendants.

Case No.:

COMPLAINT FOR:

- (1) VIOLATION OF THE
TRAFFICKING VICTIMS
PROTECTION ACT, 18 U.S.C. §§
1591(a);
- (2) PARTICIPATING IN A VENTURE IN
VIOLATION OF THE
TRAFFICKING VICTIMS
PROTECTION ACT, 18 U.S.C. §§
1591(a);
- (3) FINANCIALLY BENEFITTING
FROM SEX TRAFFICKING IN
VIOLATION OF THE
TRAFFICKING VICTIMS
PROTECTION ACT, 18 U.S.C. § 1595;

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(4) CONSPIRACY TO COMMIT VIOLATION OF THE TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. §§ 1594;

(5) VIOLATION OF RECORD KEEPING REQUIREMENTS, 18 U.S.C. § 2257;

(6) PRELIMINARY AND PERMANENT INJUNCTION; and

(7) VIOLATIONS OF CALIFORNIA LABOR CODE

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT

This is a civil action for damages and injunctive relief under the United States federal sex trafficking statute, 18 U.S.C. §§ 1591, *et seq.*, arising out of Defendants’ sex trafficking of Plaintiff Jane Doe in the States of California and Nevada. Defendant Cissy Steele, AKA Cissy Gerald (“Steele”), using interstate commerce, recruited, lured, and enticed Jane Doe with false promises of lucrative modeling opportunities to sell her for sex. Steele further coerced Jane Doe into engaging in commercial sex acts, knowing that she would use means of force, fraud, and/or intimidation to coerce Jane Doe into engaging in said commercial sex acts.

Defendants Diabolic Video Productions, Inc. (“Diabolic”), Black Ice Ltd. (“Black Ice”), Zero Tolerance Entertainment, Inc. (“Zero Tolerance”), Third Degree Films (“Third Degree”), and Elegant Angel, Inc. (“Elegant Angel”) (collectively, “Adult Film Companies”), were instrumental in knowingly aiding, abetting, facilitating, and participating in Steele’s sex trafficking scheme, while knowing, or in reckless disregard of the fact, that she would use means of force, fraud, and/or coercion to force Jane Doe into engaging in commercial sex acts in violation of the Trafficking Victims Protection Reauthorization Act (“TVPRA”). The Adult Film Companies failed to pay Jane Doe for her

1 work, albeit performed out of duress and involuntarily, and the Adult Film Companies
2 profited from Jane Doe’s forced labor.

3 Defendants KNPB Media B.V. (“KNPB”), 24-7 Internet, Inc. (“24-7”),
4 Tubexxxone.com (“Tubexxxone”), WREAL, LLC (“WREAL”), AV Entertainment, LLC.
5 (“AV Entertainment”), Asexbox.com (“Asexbox”), and Excalibur Films, LTD. (“Excalibur
6 Films”) (collectively, “Pornography Websites”), are financially benefitting from what they
7 knew, or should have known, was a sex trafficking venture in violation of § 1595 through
8 the sale of DVDs as well as streaming video(es) of Jane Doe’s sex trafficking and abuse
9 online. These Defendants have also violated 18 U.S.C. §§2257 and 2257A, requiring
10 secondary producers of pornography to verify the age and identity of the persons portrayed,
11 and to keep and maintain such records.

12 INTRODUCTION

13 1. Steele targeted and groomed Jane Doe for the sole purpose of sex trafficking
14 her, in violation of the TVPRA, so that she could profit from Jane Doe’s forced commercial
15 sex acts.

16 2. Steele preyed upon Jane Doe’s vulnerabilities and used means of fraud and
17 coercion to sex traffic Jane Doe, including misrepresenting herself as a talent agent that
18 could provide Jane Doe with lucrative modeling opportunities, all the while intending to
19 sex traffic her.

20 3. Steele coerced and lured Jane Doe to move into her home with her under false
21 pretenses, namely, by fraudulently promising that she would make Jane Doe a model.

22 4. After Jane Doe moved in with Steele, Steele used psychological manipulation
23 and coercion, intimidation tactics, threats, and physical violence to control, dominate and
24 exploit Jane Doe.

25 5. Steele forced Jane Doe to engage in commercial sex acts with men at hotels
26 in Los Angeles, CA and Las Vegas, NV, as well as other locations in Southern California.
27 Steele forced Jane Doe to give her the money from these commercial sex acts so she could
28 profit from trafficking Jane Doe.

1 6. Steele also forced Jane Doe to perform in pornographic videos for the Adult
2 Film Companies against her will and Steele was paid directly by the Adult Film Companies
3 for providing Jane Doe for use in their videos. The Adult Film Companies failed to pay Jane
4 Doe for work performed on their behalf while she acted as an employee for them, although
5 performing work involuntarily.

6 7. Steele had an ongoing relationship with the Adult Film Companies and the
7 Adult Film Companies knew or should have known of Steele's sex trafficking venture,
8 including her sex trafficking of Jane Doe. Far from taking any corrective measures, the
9 Adult Film Companies ratified and perpetuated the human trafficking scheme by continuing
10 to facilitate the production of pornography using Jane Doe and other women while paying
11 Steele directly.

12 8. The Adult Film Companies participated in Steele's sex trafficking venture,
13 knowing she was using means of fraud, force, and coercion to traffic Jane Doe, because
14 they knowingly benefited from her illegal venture by selling videos and posting videos
15 through online websites that featured Jane Doe for profit.

16 9. Steele's conduct violates the TVPRA because she knowingly used means of
17 force, fraud, and coercion to force Jane Doe to engage in commercial sex so that she could
18 profit from the activity.

19 10. The Adult Film Companies' conduct violates the TVPRA because they
20 benefitted, financially or otherwise, by aiding and abetting, facilitating, and participating in
21 Steele's sex trafficking venture, knowing that she was using means of fraud, force, and
22 coercion to sex traffic Jane Doe.

23 11. The Pornography Websites knowingly benefitted from redistributing online
24 pornographic videos and DVDs of Jane Doe that they knew, or should have known, were
25 produced as part of an illegal sex trafficking venture either because Jane Doe specifically
26 notified them and they refused to remove the content, or because they willfully turned a
27 blind eye to her sex trafficking by failing to obtain and maintain proper records from the
28 primary producers, Adult Film Companies.

JURISDICTION AND VENUE

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2 12. This Court has federal question subject-matter jurisdiction pursuant to 28
3 U.S.C. § 1331, because the Plaintiff brings this action under the federal TVPRA statute.

4 13. This Court also has supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a),
5 because all claims alleged herein are part of a continuing conspiracy and uniform pattern
6 and practice and form part of the same case or controversy.

7 14. This Court is “an appropriate district court of the United States” in accordance
8 with 18 U.S.C. § 1595, as venue is proper in this District under 28 U.S.C. § 1391(b)(2),
9 because based on information and belief, significant acts occurred in this District,
10 Defendants sex trafficked Jane Doe throughout California and Nevada, and the resultant
11 pornography videos were distributed throughout California and the U.S., including this
12 District. Therefore, a substantial part of the events or omissions giving rise to Plaintiff’s
13 claims occurred in this District.

14 **PARTIES**

15 15. Plaintiff Jane Doe is using a pseudonym to protect her identity because of the
16 sensitive and highly personal nature of this matter.

17 16. Plaintiff is also at serious risk of retaliatory harm because Steele has continued
18 to contact Jane Doe and her family, threatening physical violence against her.

19 17. Plaintiff is also particularly vulnerable because of the trauma that she has been
20 subjected to and her socioeconomic status.

21 18. Plaintiff’s safety, right to privacy, and security outweighs the public interest
22 in her identification.

23 19. Plaintiff’s legitimate concerns also outweigh any prejudice to Defendants by
24 allowing Plaintiff Jane Doe to proceed anonymously.

25 20. Defendant Cissy Steele, AKA Cissy Gerald, is a United States citizen who
26 currently resides in Las Vegas, Nevada.

27 21. Upon information and belief, Defendant Diabolic Video Productions, Inc. is
28 a California corporation with its principal place of business located at 20525 Nordhoff, Suite

1 4, Chatsworth, California. Diabolic is a pornographic film studio that was founded in 1998.
2 Diabolic solely paid Steele directly for the coerced work of Plaintiff Jane Doe.

3 22. Upon information and belief, Elegant Angel, Inc. is a California corporation
4 with its principal place of business located 20821 Dearborn Street, Chatsworth, California.
5 Elegant Angel is a pornographic film studio that was founded in 1990. Elegant Angel solely
6 paid Steele directly for the coerced work of Plaintiff Doe.

7 23. Upon information and belief, Defendant Black Ice Ltd. is a California
8 corporation with its principal place of business located at 20525 Nordhoff Suite 4,
9 Chatsworth, California. Black Ice is a pornographic film studio that was founded in 2005
10 under the umbrella company, Third Degree Films. Black Ice solely paid Steele directly for
11 the coerced work of Plaintiff Jane Doe.

12 24. Upon information and belief, Defendant Zero Tolerance Entertainment, Inc.
13 is a California corporation with its principal place of business also located at 20525
14 Nordhoff, Suite 25, Chatsworth, California. Zero Tolerance is a pornographic film studio
15 that was founded in 2002 under the umbrella company, Third Degree Films. Zero Tolerance
16 is a ‘mere continuation’ or ‘alter ego’ corporation of Black Ice in that there is substantial
17 continuity between the business operations of Black Ice and Zero Tolerance and the
18 principal assets of Black Ice, or all or substantially all of Black Ice’s assets, were transferred
19 for less than fair value to Zero Tolerance and Greg Alves (“Alves”) and Greg Dunn
20 (“Dunn”) were officers, directors, or stockholders of both corporations. Additionally, as
21 officers, directors, or stockholders of both corporations, Alves and Dunn had notice of the
22 wrongful conduct alleged herein.

23 25. Upon information and belief, KNPB Media B.V. is a Netherlands corporation
24 with its principal place of business located at Eurode Park 1-58, 6461KB, Kerkrade,
25 Netherlands. Upon information and belief, KNPB owns and operates Dvdtrailertube.com
26 (“Dvdtrailertube”) and Erotik.com (“Erotik”). Dvdtrailertube serves as an advertising
27 platform to funnel users to its sister site Erotik by hosting video clips, or “trailers,” and
28 advertising the full videos as available on Erotik. Erotik is an online pornography retailer

1 that hosts video clips and sells full videos produced by Defendant Adult Film Companies,
2 including videos of Jane Doe, that KNPB knew or should have known were created through
3 a sex trafficking venture. It does business in the U.S. and this District.

4 26. Upon information and belief, Defendant 24-7 Internet, Inc. owns and operates
5 the website Jadedvideo.com (“Jadedvideo”). Through Jadedvideo, 24-7 sells pornographic
6 DVDs produced by Defendant Adult Film Companies, including DVDs depicting Jane Doe,
7 that it knew or should have known were created through a sex trafficking venture. It does
8 business in the U.S. and this District.

9 27. Upon information and belief, Defendant Tubexxxone.com is a website doing
10 business in the U.S. which lists its current registrar as Danesco Trading, LTD with the
11 registered address of 157 Archbishop Makarios Ave, Office 1, 3206 Limassol, Cyprus. It
12 does business in the U.S. and this District.

13 28. Upon information and belief, Defendant WREAL, LLC owns and operates the
14 website Fyretv.com (“Fyretv”). WREAL is a Florida company with its principal place of
15 business located at 1728 SW 22nd Street, Suite 500, Miami, FL 33145. Fyretv is an online
16 pornography retailer which charges a subscription fee to view its video library. WREAL,
17 through Fyretv.com, advertises and sells videos produced by Defendant Adult Film
18 Companies, including videos of Jane Doe, that it knew or should have known were created
19 through a sex trafficking venture. It does business in the U.S. and this District.

20 29. Upon information and belief, Defendant AV Entertainment, Inc. owns and
21 operates aventertainments.com. AV Entertainment is a California corporation with its
22 principal place of business located at 12929 Clark Ave, City of Industry, CA 91745. AV
23 Entertainment, through Aventertainments.com, hosts video clips and sells DVDs as well as
24 downloadable and streaming videos produced by Defendant Adult Film Companies,
25 including videos of Jane Doe, that it knew or should have knew were created through a sex
26 trafficking venture. It does business in the U.S. and this District.

27 30. Upon information and belief, Defendant Asexbox.com is a pornography
28 website doing business in the U.S. which is owned and operated by Anton Panchenko, a

1 Russian citizen located at 12 Kapitanskaya Street, Office 43, Krasnoyarsk, Russia 660093.
2 Asexbox hosts pornographic video clips and images of videos produced by Defendant Film
3 Companies, including videos and images of Jane Doe, that it knew or should have known
4 were created through a sex trafficking venture. It does business in the U.S. and this District.

5 31. Upon information and belief, Defendant Excalibur Films, LTD owns and
6 operates Excaliburfilms.com. Excalibur Films is a California corporation with its principal
7 place of business located at 191 W. Shaw, #105, Fresno, California 93704. Excalibur Films,
8 through excaliburfilms.com, sells pornographic DVDs produced by Defendant Adult Film
9 Companies, including DVDs depicting Jane Doe, that it knew or should have known were
10 created through a sex trafficking venture. It does business in the U.S. and this District.

11 32. Individually and through their agents, associates, attorneys, and/or employees,
12 all Defendants have done or are doing business in California. At all relevant times,
13 Defendants operated enterprises engaged in interstate commerce or in the production of
14 goods for interstate commerce within the United States, to include California.

15 **FACTS**

16 **I. Steele Knowingly Lured and Enticed Jane Doe, Using Means of Force, Fraud,**
17 **and Coercion, to Engage in Commercial Sex Acts.**

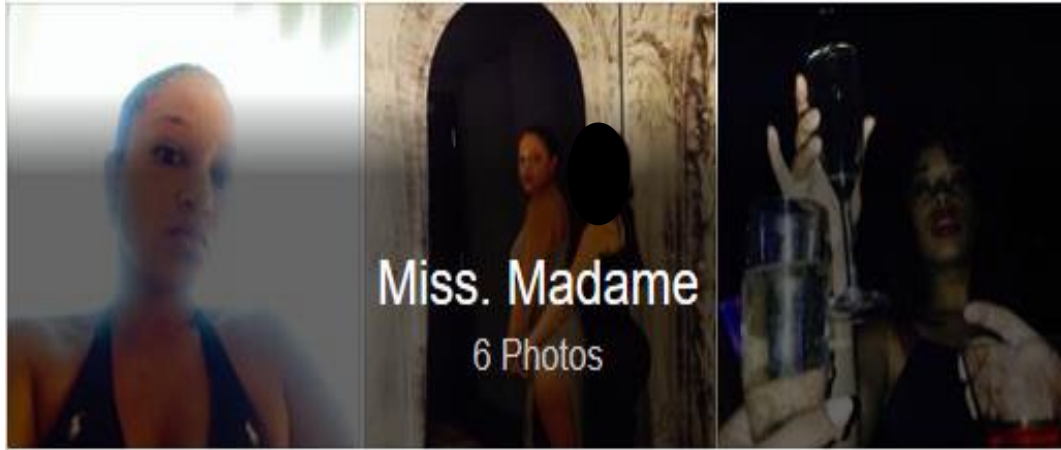
18 33. In September 2009, Plaintiff Jane Doe was aspiring to be a model. Jane Doe
19 was approached by Steele, who falsely claimed to be a talent agent for models.

20 34. Unknown to Jane Doe, however, Steele was actually a “madame,” who falsely
21 posed as a talent agent, to lure and entice young women into her sex trafficking venture so
22 that she could profit from their forced commercial sex acts.

23 35. Steele held herself out in public as “Miss. Madame” and used this name on
24 her social media platform where she posted images about the trafficking lifestyle. Steele
25 also referred to herself as “Boss lady” and had pictures up on social media depicting her
26 lifestyle as a Madame and a trafficker.

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Cissy Steele added 6 new photos.
January 13, 2010 · 🌐

Bosslady



Cissy Steele
February 27, 2009 · 🌐

Bachelor party....my girls made beaucoup stacks that night..



36. Steele told Jane Doe that she could make her a model and gave her a business card, which listed her talent agency as “Royal Loyalty Management.”

37. Approximately one week later, Steele called Jane Doe and arranged to come to her home, under the false pretense of discussing a modeling career.

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1 38. While at Jane Doe’s home, Steele again promised her that she could make her
2 a modeling star. She told Jane Doe that she knew a multi-millionaire, influential fashion
3 designer that was looking for models and that she could introduce her to him.

4 39. In October 2009, Steele lured and enticed Plaintiff to move into her home with
5 her, in reliance on Steele’s promise that it would help her career as a model.

6 40. Initially, Steele arranged for Plaintiff to do several modeling photo shoots,
7 which reinforced her belief that Steele was a talent agent that would help her pursue a
8 modeling career. Steele also continued to promise to introduce her to the fashion designer.

9 41. After approximately four or five months, however, Steele’s demeanor towards
10 Jane Doe began to change. Steele became both mentally and physically abusive to Jane
11 Doe.

12 42. Steele began to degrade Jane Doe and told her that she would never make it
13 as a model or actress. Eventually, Steele told Jane Doe that the only way she would be a
14 model or actress was to do pornographic films, but Jane Doe declined.

15 43. When Jane Doe refused to comply with Steele’s orders, Steele began
16 constantly threatening Jane Doe and her family. Steele threatened to have Jane Doe’s dog
17 killed on several occasions and also threatened to have people harm Jane Doe’s family if
18 Jane Doe did not comply with Steele’s demands. Steele also physically abused Jane Doe,
19 often using physical violence, if Jane Doe did not obey Steele.

20 **II. Steele Forced Jane Doe to Engage in Commercial Sex Acts, Using Fraud,**
21 **Threats, and Physical Force.**

22 44. Although Steele eventually did introduce Jane Doe to the influential fashion
23 designer, the sole purpose was to provide Jane Doe to him for commercial sex acts—not to
24 help her pursue a modeling career as she told Jane Doe.

25 45. The fashion designer was a man named Peter Nygard, who is currently being
26 sued for the sex trafficking and rape of many women over a period of decades.

27 46. Steele told Jane Doe that they were going to a party at the fashion designer’s
28 home so that they could discuss potential modeling opportunities. Steele did not tell Jane

1 Doe that the fashion designer had paid Steele for commercial sex acts with Jane Doe.

2 47. Once they were at the party, Steele provided Jane Doe to the fashion designer
3 for commercial sex acts.

4 48. Steele also began forcing and/or coercing Jane Doe to engage in commercial
5 sex acts with other men in California and Nevada.

6 49. Steele would set-up “dates” for Jane Doe and would negotiate the payment
7 rates with the men in advance.

8 50. Steele would then drive Jane Doe to the “dates” at various hotels in the Los
9 Angeles area, selected by the “clients,” where Plaintiff was forced and/or coerced to engage
10 commercial sex acts with them.

11 51. Steele would wait in the car for Jane Doe while Jane Doe performed
12 commercial sex acts with the men. When Jane Doe returned to the car, Steele would collect
13 the money from her. If Jane Doe attempted to withhold any money from Steele, Steele
14 would use physical violence against Jane Doe.

15 52. Steele forced and/or coerced Jane Doe to engage in commercial sex acts with
16 men, on average, two to three times per day, seven days per week. Steele always collected
17 the money from Jane Doe.

18 53. Steele would also force Jane Doe to travel to Las Vegas with her to engage in
19 commercial sex acts with men, working out of the Mandalay Bay Hotel. Steele forced Jane
20 Doe to ingest ecstasy while in Las Vegas in order to keep her active and “working.” Jane
21 Doe made approximately \$1,000 to \$3,000 each night while in Las Vegas and was forced
22 to give all the money to Steele.

23 54. Steele also had several other young women working for her while she was in
24 Las Vegas. Steele referred to the girls that she forced and coerced to work for her as her
25 “bitches.” The girls that made her the most money received special treatment and/or
26 privileges. Those who did not earn as much as Steele expected were punished and/or beaten.

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1 **III. Steele Forced Jane Doe to Perform in Pornographic Videos for the Adult Film**
2 **Companies Against her Will and the Adult Film Companies Knew, or Were in**
3 **Reckless Disregard of the Fact, That Steele was Trafficking Jane Doe.**

4 55. Steele has a longstanding relationship with the Adult Film Companies and
5 speaks with their executives and/or agents on a regular basis. Jane Doe overheard Steele
6 speaking with representatives of the Adult Film Companies on the phone, offering Jane Doe
7 and other women to perform sexual acts as a performer in pornographic videos.

8 56. Upon information and belief, the Adult Film Companies only paid Steele for
9 Jane Doe's coerced pornography production. The Adult Film Companies never financially
10 compensated Plaintiff or any of the other "Steele girls" for the work they performed.
11 Defendant Adult Film Companies either never obtained written consent or established any
12 kind of contractual relationship with Jane Doe, or any such "release" was signed under
13 duress, but the Adult Film Companies nevertheless profited, along with Steele, off of the
14 production and publication of the pornography Jane Doe took part in. Jane Doe was just 19
15 years old when these events took place.

16 57. During 2010, Steele forced Plaintiff to do pornographic films for the Adult
17 Film Companies. When Jane Doe protested, Steele threatened her and her family with
18 violence and also physically struck Jane Doe.

19 58. Based on Steele's physical violence to Jane Doe and threats of physical
20 violence to Jane Doe and her family, Jane Doe was in fear of harm and complied with
21 Steele's demands and instructions.

22 59. Steele would transport Jane Doe to the Adult Film Companies' studios. Jane
23 Doe would go inside and sexually perform as instructed and directed by the Adult Film
24 Companies' employees and Steele. Afterwards, Jane Doe would call Steele, as instructed,
25 and Steele would pick Jane Doe up from the Adult Film Companies' production studios and
26 transport her back to her residence.

27 60. The Adult Film Companies paid Steele directly for Jane Doe's performance
28 in the pornographic films, usually a few weeks later by check, knowing or recklessly

1 disregarding the fact that Steele was coercing and/or forcing Jane Doe to perform in the
2 pornographic films.

3 61. Jane Doe never saw the checks that Steele received from the Adult Film
4 Companies and does not know how much she was paid for providing Jane Doe to the Adult
5 Film Companies. Jane Doe never received any money for her performance in any of the
6 pornographic films that she did for the Adult Film Companies.

7 **IV. Jane Doe Escaped from Steele.**

8 62. Jane Doe was forced and/or coerced to participate in Steele’s sex trafficking
9 scheme. Steele constantly threatened Jane Doe, saying “you don’t want to know what will
10 happen to you” if she left. Steele also threatened to have Jane Doe killed, threatened her
11 family, and threatened to kill her dog if she did not cooperate.

12 63. Steele would commit physical violence against Jane Doe if she resisted or did
13 not cooperate. Steele, on numerous occasions, would exert control over Jane Doe by forcing
14 her to take illicit drugs, thus making Jane Doe dependent on her.

15 64. As a direct result of Steele’s threats, violence, and coercion, Jane Doe was
16 afraid to leave.

17 65. In late 2010, Jane Doe became suicidal. Despite the threats to her and her
18 family, she felt that she had to escape or she would kill herself.

19 66. Jane Doe began secretly looking for places to live when she was left alone by
20 Steele. Jane Doe was able to find a friend that agreed to let her move in with her, since Jane
21 Doe did not have any money.

22 67. Jane Doe secretly began moving some of her things to her friend’s home when
23 Steele was not around. Jane Doe was eventually able to escape Steele’s control one night
24 in the middle of the night and never returned.

25 68. After escaping, Jane Doe changed her phone number and ceased all her
26 communication with Steele.

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1 **V. Steele Continued to Threaten Jane Doe and Her Family After Jane Doe**
2 **Escaped.**

3 69. After Jane Doe escaped Steele's control, Steele began calling Jane Doe's
4 mother and neighbor, threatening them and Jane Doe if she did not return. Steele made
5 threatening calls to Jane Doe's neighbor and mother almost every week after Jane Doe left
6 her control.

7 70. Steele threatened to find Jane Doe and hunt her down if she did not return
8 and/or if she did not remain silent about Steele's sex trafficking scheme.

9 71. Steele also attempted to lure and entice Jane Doe to return back to her control
10 by promising to pay her and buy her things.

11 72. Due to Steele's psychological manipulation, constant threats, and physical
12 abuse, Jane Doe was too afraid to report Steele to authorities out of fear for her own well-
13 being and the well-being of her family.

14 **VI. Videos of Jane Doe's Sex Trafficking Continue to be Accessible and Monetized**
15 **on Defendant Elegant Angel's Website and Defendant Pornography Websites.**

16 73. On January 28, 2019, Defendant Elegant Angel released a compilation video
17 entitled "Finest Black Porn Stars Volume 4,"¹ which includes scenes from various Elegant
18 Angel productions, including one of the films depicting the sex trafficking of Jane Doe.

19 74. Defendant Elegant Angel continues to profit from and exploit Jane Doe
20 through the sale of the above-named sex trafficking video as a DVD, online streaming
21 video, and via the traffic it brings to their website. Jane Doe is pictured in the preview and
22 thumbnail view advertising the video.

23 75. Defendant KNPB, through its website Dvdtrailertube.com hosts a streaming
24 video clip² depicting Jane Doe's sex trafficking abuse and advertising one of the sex
25 trafficking DVDs produced by Defendant Elegant Angel.

26
27 ¹ See <https://www.elegantangel.com/shop/2599377/finest-black-porn-stars-vol-4-porn-movies.html> last
28 viewed on Sept. 14, 2020, attached as Exhibit A.

² See <http://www.dvdtrailertube.com/-Elegant-Angel-trailer-24922.html> last viewed Sept. 14, 2020,
attached as Exhibit B.

1 76. KNPB, through Dvdtrailertube, directs those who wish to purchase the DVD
2 to another website that it owns and operates, Erotik.com. Additionally, KNPB monetizes
3 the video clip on Dvdtrailertube through advertisements on its webpage and furthers the
4 proliferation of the video by allowing anyone who comes to the website to embed it into
5 their own website or blog. KNPB advertises this embed link as a service provided to its
6 website users.

7 77. Upon information and belief, Dvdtrailertube has an advertising relationship
8 with Defendant Erotik and both are owned by KNPB Media B.V.

9 78. Jane Doe notified Dvdtrailertube, and thus KNPB, that this video depicts her
10 being sex trafficked and demanded that it be removed from the websites.

11 79. KNPB did not remove the video after being placed on notice that the video
12 depicted sex trafficking.

13 80. Defendant KNPB also hosts, through its website Erotik, streaming videos
14 clips³ depicting the sex trafficking of Jane Doe, as well as screenshots, and the full
15 downloadable videos for purchase.

16 81. In addition to profits from the sale of the full sex trafficking videos, KNPB
17 monetizes the free video clips on Erotik via internet traffic and advertisements on the
18 website.

19 82. Jane Doe notified Erotik, and thus KNPB, that these videos depict her being
20 sex trafficked and demanded they be removed.

21 83. KNPB did not remove the videos from its website Erotik.com after being
22 placed on notice that the video depicted sex trafficking.

23 84. Therefore, KNPB is knowingly benefitting from and facilitating sex
24 trafficking, in violation of § 1591.

25 85. KNPB is also knowingly benefitting from what they know or should know is
26 sex trafficking, in violation of § 1595.

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³ See <https://erotik.com/en/elegant-angel/naughty-black-housewives-2>; <https://erotik.com/en/elegant-angel/finest-black-porn-stars-4-4-stunden/scene/5> last viewed on Sept. 14, 2020, attached as Exhibit C.

1 86. Defendant 24-7, through its website Jadedvideo.com, advertises for sale four
2 DVDs⁴ depicting Jane Doe’s sex trafficking from Defendant producers Black Ice, Diabolic,
3 and Elegant Angel.

4 87. Jane Doe notified Jadedvideo, and thus 24-7, that these videos depict her being
5 sex trafficked and demanded they be removed.

6 88. 24-7 did not remove the videos after being placed on notice that the video
7 depicted sex trafficking.

8 89. 24-7 continues to benefit from the advertisement and sale of DVDs depicting
9 Jane Doe’s sex trafficking.

10 90. Therefore, 24-7 is knowingly benefitting from and facilitating sex trafficking,
11 in violation of § 1591.

12 91. 24-7 is also knowingly benefitting from what they know or should know is
13 sex trafficking, in violation of § 1595.

14 92. Defendant Tubexxxone hosts a streaming video clip⁵ depicting the sex
15 trafficking of Jane Doe and bearing Defendant Elegant Angel’s watermark.

16 93. Tubexxxone monetizes this video through traffic to their website, pop-up
17 advertisements, and advertisements placed all over the webpage.

18 94. Jane Doe notified Tubexxxone that this video depicts her being sex trafficked
19 and demanded that it be removed.

20 95. Tubexxxone did not remove the video after being placed on notice that the
21 video depicted sex trafficking.

22 96. Therefore, Tubexxxone is knowingly benefitting from and facilitating sex
23 trafficking, in violation of § 1591.

24 97. Tubexxxone is also knowingly benefitting from what they know or should
25 know is sex trafficking, in violation of § 1595.

26
27 ⁴ See http://www.jadedvideo.com/artist/Tatum_Onassis.6-52388.html last viewed on Sept. 14, 2020,
28 attached as Exhibit D.

⁵ See <https://tubexxxone.com/en/oneddir/dW0tMjQ4LTEsNzUwNjkx/Anal-Threesome-With-Imani-Rose-And-Tatum-Onassis/> last viewed on Sept. 14, 2020, attached as Exhibit E.

1 98. Defendant WREAL, through its website Fyretv.com, hosts videos⁶ from
2 Defendant Diabolic depicting the sex trafficking of Jane Doe.

3 99. WREAL's website Fyretv hosts still pornographic images of Jane Doe's sex
4 trafficking as advertisements for the full streaming videos with purchase of a subscription.

5 100. Jane Doe notified Fyretv, and thus WREAL, that these videos depict her being
6 sex trafficked and demanded they be removed.

7 101. WREAL did not remove the images and videos after being placed on notice
8 that the video depicted sex trafficking.

9 102. Therefore, WREAL is knowingly benefitting from and facilitating sex
10 trafficking, in violation of § 1591.

11 103. WREAL is also knowingly benefitting from what they know or should know
12 is sex trafficking, in violation of § 1595.

13 104. Defendant AV Entertainment, through its website Aventertainments.com,
14 sells one of the sex trafficking DVDs⁷ of Jane Doe produced by Defendant Elegant Angel.
15 AV Entertainment also allows for the purchase of pay per viewing, full download, and
16 streaming of this same video content depicting Jane Doe.

17 105. AV Entertainment displays pornographic still images on
18 Aventertainments.com of various scenes from the videos as a way of advertising the full
19 videos for sale. AV Entertainment is a secondary producer, under 18 U.S.C. § 2257 record
20 keeping requirements, publishing, duplicating, reproducing, distributing and maintaining
21 actual sexually explicit content on its website from the American primary pornography
22 producer Defendant Elegant Angel with, or without their permission.

23 106. Accordingly, AV Entertainment is required to ascertain and maintain records
24 of every performer visually depicted, like Jane Doe, in the sexually explicit videos they
25

26 ⁶ See <https://www.fyretv.com/movies/31205-breast-beginnings>, last viewed on Sept. 14, 2020, attached
27 as Exhibit F.

28 ⁷ See https://www.aventertainments.com/product_lists.aspx?product_id=39301&languageID=1&dept_id=43
last viewed on Sept. 14, 2020, attached as Exhibit G.

1 publish, duplicate, reproduce, distribute, and maintain. These records are to include an
2 identification document containing the performer's legal name and date of birth. Copies of
3 such documentation from the primary producer are sufficient to meet this requirement.

4 107. Upon information and belief, AV Entertainment did not obtain any such
5 documentation from the primary producer Elegant Angel and AV Entertainment obtained
6 no such documentation directly from Jane Doe.

7 108. Upon information and belief, AV Entertainment either, never sought to obtain
8 the required documentation in order to willfully turn a blind eye to the sex trafficking
9 operation which originally produced these videos or, proceeded to reproduce these videos
10 despite the lack of required documentation from the primary producer which violated §
11 2257.

12 109. Therefore, AV Entertainment facilitated and benefitted from what it knew or
13 should have known was sex trafficking in violation of § 1595.

14 110. Defendant Asexbox.com hosts in full streaming video⁸ one of the originally
15 produced films by Defendant Elegant Angel depicting the sex trafficking of Jane Doe.

16 111. Asexbox provides for free viewing of this video at low quality and higher
17 quality with a premium subscription. Asexbox also monetizes this video through
18 advertisements on its website.

19 112. Asexbox is a secondary producer, under 18 U.S.C. § 2257 record keeping
20 requirements, publishing, duplicating, reproducing, distributing, and maintaining sexually
21 explicit content on its website from the American primary pornography producer Defendant
22 Elegant Angel with, or without their permission.

23 113. Accordingly, Asexbox is required to ascertain and maintain records of every
24 performer visually depicted, like Jane Doe, in the sexually explicit videos they publish,
25 duplicate, reproduce, distribute, and maintain. These records are to include an identification
26
27

28 ⁸ See <http://asebox.com/world/38471-naughty-black-housewives-2.html>, last viewed on. Sept. 14, 2020,
attached as Exhibit H.

1 document containing the performer's legal name and date of birth. Copies of such
2 documentation from the primary producer are sufficient to meet this requirement.

3 114. Upon information and belief, Asexbox did not obtain any such documentation
4 from the primary producer Elegant Angel and Asexbox obtained no such documentation
5 directly from Jane Doe.

6 115. Upon information and belief, Asexbox either, never sought to obtain the
7 required documentation in order to willfully turn a blind eye to the sex trafficking operation
8 which originally produced these videos or, proceeded to reproduce these videos despite the
9 lack of required documentation from the primary producer which violated § 2257.

10 116. Therefore, Asexbox facilitated and benefitted from what it knew or should
11 have known was sex trafficking in violation of § 1595.

12 117. Defendant Excalibur Films, through its website Excaliburfilms.com, sells one
13 of the DVDs⁹ originally produced by Defendant Elegant Angel.

14 118. Excalibur Films is a secondary producer, under 18 U.S.C. § 2257 record
15 keeping requirements, publishing, duplicating, reproducing and/or distributing content from
16 the primary pornography producer Defendant Elegant Angel with, or without their
17 permission.

18 119. Accordingly, Excalibur Films is required to ascertain and maintain records of
19 every performer visually depicted, like Jane Doe, in the sexually explicit videos they
20 distribute. These records are to include an identification document containing the
21 performer's legal name and date of birth. Copies of such documentation from the primary
22 producer are sufficient to meet this requirement.

23 120. Upon information and belief, Excalibur Films did not obtain any such
24 documentation from the primary producer Elegant Angel and Excalibur Films obtained no
25 such documentation directly from Jane Doe.

26 ///

27
28 ⁹ See https://www.excaliburfilms.com/AdultDVD/823514D2_Naughty_Black_Housewives_2_dvd.htm,
last viewed on Sept. 14, 2020, attached as Exhibit I.

1 121. Excalibur Films either, never sought to obtain the required documentation in
2 order to willfully turn a blind eye to the sex trafficking operation which originally produced
3 these videos or, proceeded to reproduce these videos despite the lack of required
4 documentation from the primary producer which violated § 2257.

5 122. Therefore, Excalibur Films facilitated and benefitted from what it knew or
6 should have known was sex trafficking in violation of § 1595.

7 **VII. Plaintiff's Claims are within the Statute of Limitations; alternatively, the Statute**
8 **of Limitations Should be Tolloed Because Steele Uses Threats and Force to**
9 **Prevent Victims from Pursuing Their Claims.**

10 123. Plaintiff was sex trafficked from 2009 until 2011, when she escaped from
11 Steele.

12 124. Plaintiff's claims against Defendants for actions occurring between 2010 until
13 2011 include claims against Steele and the Adult Film Companies for conspiracy to violate
14 Section 1591's ban on sex trafficking.

15 125. Steele and the Adult Film Companies' conspiracy to violate Section 1591
16 continued from at least 2010 until Plaintiff's escape in 2011.

17 126. Because Plaintiff's claims regarding conduct occurring before 2011 are based
18 on a continuing conspiracy, their timeliness is assessed based on when the conspiracy
19 ended.

20 127. Steele and the Adult Film Companies' sex trafficking conspiracy continued
21 until at least 2011, which is within Section 1595's ten-year statute of limitations.

22 128. Plaintiff's claims, including those for conduct occurring before 2011, are thus
23 timely.

24 129. In the alternative, due to extraordinary circumstances and Steele's conduct,
25 which prevented, to the extent applicable, Plaintiff from bringing her claims, the applicable
26 statute of limitations is equitably tolled for all of Plaintiff's claims for actions occurring
27 during the time of Plaintiff's exploitation, ending in 2011.

28

1 130. The general rule is that statutes of limitations are subject to equitable tolling.
2 *See United States v. Locke*, 471 U.S. 84, 94 n.10 (1985) (“Statutory filing deadlines are
3 generally subject to the defenses of waiver, estoppel, and equitable tolling.”); *Young v.*
4 *United States*, 535 U.S. 43, 49 (2002) (“It is hornbook law that limitations periods are
5 customarily subject to equitable tolling unless tolling would be inconsistent with the text of
6 the relevant statute.”) (quotation marks and citations omitted).

7 131. Plaintiff, to the extent applicable here, pursued her rights diligently and she
8 was impeded because of a combination of force, threats of force, shame, embarrassment,
9 fear, and weak laws that are rarely enforced to protect the victim. As a result, to the extent
10 necessary, all applicable statutes of limitations should be equitably tolled as to claims for
11 conduct occurring before 2011.

12 132. To the extent that Plaintiff was unable to pursue her claims for conduct
13 occurring before 2011, she was legitimately and justifiably afraid that Steele would harm
14 and/or retaliate against her and her family if she pursued any claim against her and others.

15 133. As discussed herein, Steele used physical violence and financial pressure to
16 intimidate Plaintiff and prevent her from coming forward.

17 134. Due to Steele’s power and intimidation tactics and violence, Plaintiff
18 reasonably believed that she and her family were in mortal danger.

19 135. Steele has close associations with shadowy figures with histories of violence
20 and intimidation.

21 **CLAIMS ALLEGED**

22 **COUNT I**

23 **VIOLATION OF THE TRAFFICKING VICTIMS PROTECTION ACT,**
24 **18 U.S.C. §§ 1591(a)**

25 136. Plaintiff realleges and incorporates by reference the allegations contained in
26 paragraphs 1-134, as if fully set forth in this Count.

27 137. Steele knowingly used the instrumentalities and channels of interstate and
28 foreign commerce to facilitate violations of 18 U.S.C. § 1591(a)(1), occurring within the

1 territorial jurisdiction of the United States.

2 138. Steele's conduct was in or affecting interstate or foreign commerce for
3 purposes of the TVPRA.

4 139. Steele knowingly recruited, enticed, harbored, transported, provided,
5 obtained, advertised, maintained, patronized, or solicited Jane Doe for the purpose of
6 causing her to engage in commercial sex acts, through the use of force, fraud, and/or
7 coercion, pursuant to 18 U.S.C. § 1591(a).

8 140. Jane Doe engaged in commercial sex acts with different men, due to Steele's
9 use of force, fraud and/or coercion.

10 141. Steele fraudulently promised or promised to provide Jane Doe something of
11 value in exchange for each sexual act, including a future modeling career and/or portions of
12 the profits obtained from her commercial sex acts.

13 142. Steele received financial compensation for Jane Doe's sex trafficking.

14 143. Steele's conduct has caused Jane Doe serious and permanent harm, including,
15 without limitation, physical, psychological, financial, and reputational harm, that is
16 sufficiently serious, under all the surrounding circumstances, to compel a reasonable person
17 of the same background and in the same circumstances to perform or to continue performing
18 commercial sexual activity, in order to avoid incurring that harm.

19 **COUNT II**

20 **PARTICIPATING IN A VENTURE IN VIOLATION OF**
21 **THE TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. §§ 1591(a)**

22 144. Plaintiff realleges and incorporates by reference the allegations contained in
23 paragraphs 1-134, as if fully set forth in this Count.

24 145. Defendants participated in a venture together, in violation of 18 U.S.C. §
25 1591(a)(2).

26 146. The Adult Film Companies knowingly benefited from, and received value for,
27 their participation in the venture, in which Steele, with the Adult Film Companies'
28 knowledge, or in reckless disregard of the fact, that Steele would defraud, force, and/or

1 coerce Jane Doe to engage in commercial sex acts.

2 147. The Adult Film Companies knew or were in reckless disregard of the fact that
3 it was Steele’s pattern and practice to use the interstate commerce and the resources
4 provided by the Defendants to entice and recruit young aspiring female models into
5 commercial sex acts based on the promise of lucrative modeling opportunities. The Adult
6 Film Companies’ employees and/or agents had actual knowledge that they were facilitating
7 and participating in Steele’s scheme to recruit, entice, coerce, and/or solicit Jane Doe into
8 commercial sex acts, through the use of force, fraud, and/or coercion.

9 148. Despite such knowledge, the Adult Film Companies facilitated and
10 participated in Steele’s violations of 18 U.S.C. § 1591, where the they knew, or were in
11 reckless disregard of the fact that Steele would use coercion, fraud, and/or force to get Jane
12 Doe, an aspiring young model, to engage in commercial sex acts.

13 149. The Adult Film Companies knowingly benefited financially and/or personally
14 from Steele’s sex-trafficking venture and the exploitation of Jane Doe.

15 150. By facilitating and participating in Steele’s sex trafficking venture, the Adult
16 Film Companies profited from Jane Doe’s forced and/or coerced participation in their
17 pornographic films.

18 151. The Adult Film Companies’ conduct has caused Jane Doe serious harm
19 including, without limitation, physical, psychological, financial, and reputational harm, that
20 is sufficiently serious, under all the surrounding circumstances, to compel a reasonable
21 person of the same background and in the same circumstances to perform or to continue
22 performing commercial sexual activity, in order to avoid incurring that harm.

23 **COUNT III**

24 **FINANCIALLY BENEFITTING FROM SEX TRAFFICKING IN VIOLATION OF**
25 **THE TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. § 1595**

26 152. Plaintiff realleges and incorporates by reference the allegations contained in
27 paragraphs 1-134 as if fully set forth in this Count.

28 153. Plaintiff was sex trafficked into pornography, by being forced, coerced, and

1 defrauded into performing commercial sex acts for Defendants Steele and Adult Film
2 Companies.

3 154. Defendants Steele and Adult Film Companies thus collectively participated in
4 a sex trafficking venture to produce and profit from pornographic videos.

5 155. The resulting pornographic videos of the Plaintiff were uploaded to numerous
6 websites, including Pornography Websites.

7 156. Each of the Defendant Pornography Websites monetize through
8 advertisements and subscription fees or otherwise profit from the hosting and sale of these
9 pornographic videos of the Plaintiff.

10 157. Plaintiff notified Defendants KNPB, 24-7, Tubexxxone, and WREAL that she
11 was forced, coerced, and defrauded into making the pornographic videos featured on their
12 websites.

13 158. Defendants KNPB, 24-7, Tubexxxone, and WREAL refused to remove the
14 videos depicting the sex trafficked Plaintiff from their websites.

15 159. Defendants KNPB, 24-7, Tubexxxone, and WREAL knowingly benefitted
16 financially from pornographic videos of the Plaintiff that they actually knew were created
17 and distributed as part of a sex trafficking venture.

18 160. Defendants AV Entertainment, Asexbox, and Excalibur Films made no
19 attempt to verify that the videos from Defendant Adult Film Companies they were
20 publishing, duplicating, reproducing, distributing and/or managing on a computer site were
21 created and distributed with Plaintiff's consent.

22 161. Despite a legal obligation under 18 U.S.C. § 2257 to obtain records of each
23 performer in the pornographic videos these defendants publish, duplicate, reproduce,
24 distribute, and/or manage on their websites, Defendants AV Entertainment, Asexbox, and
25 Excalibur Films failed to obtain such documentation from the primary producers Defendant
26 Adult Film Companies thereby willfully turning a blind eye to the sex trafficking of
27 Plaintiff.

28 162. Defendants AV Entertainment, Asexbox, and Excalibur Films knowingly

1 benefitted from pornographic videos of the Plaintiff that they knew or should have known
2 were created and distributed as part of a sex trafficking venture.

3 **COUNT IV**

4 **CONSPIRACY TO COMMIT VIOLATION OF THE**
5 **TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. §§ 1594**

6 163. Plaintiff realleges and incorporates by reference the allegations contained in
7 paragraphs 1-134, as if fully set forth in this Count.

8 164. The Adult Film Companies conspired with Steele, by agreement or
9 understanding, to further Steele's unlawful plan and/or purpose to commit illegal
10 commercial sex acts with Jane Doe.

11 165. The Adult Film Companies committed overt acts in furtherance of the
12 agreement or understanding by knowingly using Jane Doe, against her will, to perform in
13 their pornographic films and/or to engage in sexual activity and paying Steele for such use.

14 166. The Adult Film Companies' participation in the furtherance of Steele's illegal
15 sex trafficking plan and/or purpose was intentional and/or willful and, therefore, the Adult
16 Film Companies intentionally and/or willfully caused Jane Doe's commission of the sex
17 acts in their affirmative acts supporting Steele.

18 167. The Adult Film Companies knew that their acts and conduct supporting and
19 facilitating Steele would lead to commercial sex acts by Jane Doe.

20 168. The Adult Film Companies conspired with Steele through their affirmative
21 acts and provided substantial support to Steele forcing and/or coercing Jane Doe to engage
22 in commercial sex acts.

23 169. The Adult Film Companies conduct has caused Jane Doe serious harm,
24 including, without limitation, physical, psychological, financial, and reputational harm, that
25 is sufficiently serious, under all the surrounding circumstances, to compel a reasonable
26 person of the same background and in the same circumstances to perform or to continue
27 performing commercial sexual activity in order to avoid incurring that harm.

28 ///

COUNT V

VIOLATION OF RECORD KEEPING REQUIREMENTS, 18 U.S.C. § 2257

170. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1-134 as if fully set forth in this Count.

171. Defendant Pornography Websites are secondary producers as defined by §§2257(h)(2)(A)(ii) for their activities, “digitizing an image, of a visual depiction of sexually explicit conduct; or, assembling, manufacturing, publishing, duplicating, reproducing, or reissuing a . . . film, videotape, digital image, or picture, or other matter intended for commercial distribution, that contains a visual depiction of sexually explicit conduct.”

172. Defendant Pornography Websites, as secondary producers of visual depictions of actual sexually explicit conduct are required to “create and maintain individually identifiable records pertaining to every performer portrayed in such a visual depiction.” 18 U.S.C. §§2257(a).

173. Defendant Pornography Websites did not ascertain or examine any identification document from the Plaintiff containing her name and date of birth.

174. Defendant Pornography Websites did not obtain or maintain copies of such records from the primary producers, Defendant Adult Film Companies.

175. Defendant Pornography Websites are in violation of §2257 record keeping requirements which caused the Plaintiff harm and facilitated her exploitation and sex trafficking in violation of §1591 and §1595.

COUNT VI

PRELIMINARY AND PERMANENT INJUNCTION

176. Plaintiff realleges and incorporates by reference the allegations contained in paragraphs 1-134, as if fully set forth in this Count.

177. Unless this Court enjoins Defendants from promoting, publishing, disseminating, and/or selling pornographic videos featuring Plaintiff Jane Doe, she will

1 continue to sustain irreparable harm in the form of emotional distress and reputational
2 damage.

3 178. Plaintiff Jane Doe has no adequate remedy at law to cure this problem, as
4 monetary damages will not suffice.

5 179. Unless an injunction is issued, Defendants will continue to promote, publish,
6 disseminate, and/or sell pornographic videos featuring Plaintiff Jane Doe and Plaintiff will
7 continue to suffer irreparable harm.

8 180. Videos featuring Plaintiff Jane Doe are currently being promoted, published,
9 and/or disseminated on the internet and through other means, including, without limitation,
10 the following:

11 [https://www.elegantangel.com/shop/2599377/finest-black-porn-stars-
12 vol-4-porn-movies.html](https://www.elegantangel.com/shop/2599377/finest-black-porn-stars-vol-4-porn-movies.html)

13 <http://www.dvdtrailertube.com/Tatum-Onassis-movies.html>

14 <http://www.dvdtrailertube.com/-Elegant-Angel-trailer-24922.html>

15 [https://tubexxxone.com/en/oneddir/dW0tMjQ4LTExNzUwNjkx/Anal
16 -Three-some-With-Imani-Rose-And-Tatum-Onassis/](https://tubexxxone.com/en/oneddir/dW0tMjQ4LTExNzUwNjkx/Anal-Three-some-With-Imani-Rose-And-Tatum-Onassis/)

17 [https://erotik.com/en/elegant-angel/finest-black-porn-stars-4-4-
18 stunden/scene/5](https://erotik.com/en/elegant-angel/finest-black-porn-stars-4-4-stunden/scene/5)

19 <https://erotik.com/en/elegant-angel/naughty-black-housewives-2>

20 <https://www.fyretv.com/movies/31205-breast-beginnings>

21 [https://www.aventertainments.com/product_lists.aspx?product_id=39
22 301&languageID=1&dept_id=43](https://www.aventertainments.com/product_lists.aspx?product_id=39301&languageID=1&dept_id=43)

23 <http://asexbox.com/world/38471-naughty-black-housewives-2.html>

24 [https://www.excaliburfilms.com/AdultDVD/823514D2_Naughty_Bla
25 ck_Housewives_2_dvd.htm](https://www.excaliburfilms.com/AdultDVD/823514D2_Naughty_Black_Housewives_2_dvd.htm)

1 181. Plaintiff Jane Doe is entitled to preliminary and permanent injunctive relief,
2 including prohibiting Defendants from continuing to promote, publish, disseminate, and/or
3 sell any pornographic videos featuring Plaintiff Jane Doe.

4 **COUNT VII**

5 **VIOLATIONS OF CALIFORNIA LABOR CODE sections 201 *et. seq.***
6 **(AGAINST DEFENDANTS ADULT FILM COMPANIES)**

7 182. Plaintiff Jane Doe realleges and incorporates by reference the allegations
8 contained in paragraphs 1-135, as if fully set forth in this Count.

9 183. Plaintiff was forced to work for Adult Film Companies. Adult Film
10 Companies failed to pay Jane Doe for work she performed for the benefit of Adult Film
11 Companies, in violation of California law and the California Labor Code, including but not
12 limited to sections 201, 1194 and 226.8.

13 184. There is a presumption in California that all persons performing work for the
14 benefit of another are considered employees. Although not performing the services
15 voluntarily, the Adult Film Companies were still required to pay Jane Doe for services she
16 provided for their benefit. Instead, the Adult Film Companies never paid Jane Doe for work
17 she performed, although the Adult Film Companies profited substantially.

18 185. The Adult Film Companies owe Jane Doe unpaid wages for all work she
19 performed while acting as an employee of the Adult Film Companies. Jane Doe is also
20 entitled to statutory penalties and back pay damages against Adult Film Companies for their
21 negligent or intentional failure to pay her all wages owed for services performed.

22 186. Defendants either intentionally or negligently never provided wage statements
23 to Jane Doe and did not provide her with annual tax statements identifying the hours of
24 work she performed.

25 187. As a result of the Adult Film Companies failure to pay Jane Doe any wages,
26 she was not paid minimum wage, a separate violation of California regulations and Labor
27 Code.

28

1 188. As a result of Adult Film Companies conduct, Jane Doe has suffered monetary
2 damages, including owed wages, statutory penalties and interest and attorneys’ fees.

3 **REQUEST FOR RELIEF**

4 Plaintiff respectfully requests that the Court enter judgment in her favor, and against
5 Defendants, as follows:

6 a. That the Court grant preliminary and permanent injunctive relief to prohibit
7 Defendants from continuing to engage in the unlawful acts and practices described herein;

8 b. A finding of an alter ego between Black Ice Entertainment Ltd, Zero
9 Tolerance Entertainment and Third Degree Films Inc, thus piercing the corporate veil;

10 c. That the Court award Plaintiff compensatory, consequential, general, and
11 nominal damages in an amount to be determined at trial;

12 d. Requiring restitution and disgorgement of all profits and unjust enrichment
13 obtained as a result of Defendants’ unlawful conduct;

14 e. That the Court award punitive or exemplary damages in an amount to be
15 determined at trial;

16 f. That the Court award to Plaintiff the costs and disbursements of the action,
17 along with reasonable attorneys’ fees, costs, and expenses;

18 g. That the Court award statutory damages and penalties;

19 h. That the Court award pre- and post-judgment interest at the maximum legal
20 rate; and

21 i. That the Court grant all such other relief as it deems just and proper.

22 **JURY DEMAND**

23 Plaintiff demands a trial by jury on all claims so triable.

24
25
26 Dated: September 24, 2020 By: /s/ Deborah S. Dixon
27 John H. Gomez, Esq.
28 Deborah S. Dixon, Esq.
GOMEZ TRIAL ATTORNEYS

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**Pro Hac Vice Application Pending*

Counsel for Plaintiff Jane Doe

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 24, 2020.

/s/ Deborah S. Dixon
DEBORAH S. DIXON

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