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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES**

VICTORIA VALENTINO A/K/A VICTORIA  
CARBÉ-CHEN, and individual,

Plaintiff,

v.

WILLIAM COSBY, JR., an individual; and  
DOES 1–20,

Defendants.

Case No.

**COMPLAINT FOR DAMAGES for:**

- 1) **SEXUAL ASSAULT;**
- 2) **SEXUAL BATTERY**

**DEMAND FOR JURY TRIAL**

**INTRODUCTION**

This case is about a prominent actor and comedian who used his notoriety and status to sexually assault an up-and-coming young female artist. Defendant William “Bill” Cosby utilized his power and authority over Plaintiff to sexual assault Plaintiff. Plaintiff has suffered severe emotional, physical, and psychological distress because of the sexual assault. Plaintiff brings this action to hold Defendant Cosby accountable for the harm he has caused her.

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1 **JURISDICTION AND VENUE**

2 1. This Court has jurisdiction over the subject matter of this action pursuant to Article  
3 VI, section 10 of the California Constitution and section 410.10 of the California Code of Civil  
4 Procedure.

5 2. Venue is proper in this Court under Code of Civil Procedure section 395 because  
6 Plaintiff resides in Los Angeles County. In addition, a substantial part of the conduct and omissions  
7 giving rise to the violations of law alleged herein occurred in Los Angeles County.

8 **PARTIES**

9 1. Plaintiff is an adult female currently residing in Los Angeles County, California.  
10 At the time of the grooming and assault by Defendant Cosby, Plaintiff was a resident of  
11 California. The physical assault occurred in Los Angeles, California, in Los Angeles County.

12 2. Upon information and belief, Defendant Cosby is an individual residing in Franklin  
13 County, Massachusetts. At all times mentioned herein, Defendant Cosby is and was an actor and  
14 stand-up comedian.

15 3. The true names and capacities, whether individual, corporate, partnership,  
16 associate, or otherwise, of Defendants DOES 1–20, inclusive, are unknown to Plaintiff.  
17 Accordingly, Plaintiff sues DOES 1–20 by such fictitious names pursuant to section 474 of the  
18 California Code of Civil Procedure. Plaintiff will seek leave to amend this Complaint to allege  
19 their true names and capacities when they are ascertained. Plaintiff is informed and believes and  
20 thereon alleges that DOES 1–20 is legally responsible in some manner for the events, happenings,  
21 and/or tortious and unlawful conduct that caused the injuries and damages alleged in this  
22 Complaint.

23 4. On information and belief, at all times material hereto, Defendants were the agents,  
24 representatives, servants, employees, partners, and/or joint venturers of each and every other  
25 Defendant and were acting within the course and scope of said alternative capacity, identity,  
26 agency, representation and/or employment and were within the scope of their authority, whether  
27 actual or apparent. Each of the Defendants is responsible in some manner for one or more of the  
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1 events and happenings described herein. Each Defendant approved and/or ratified the conduct of  
2 each other Defendant. Consequently, each Defendant is jointly and severally liable to Plaintiff for  
3 the damages sustained as a proximate result of his, her, or its conduct. Each of the Defendants  
4 proximately caused the injuries and damages alleged.

5 5. Whenever reference is made to “Defendants” in this Complaint, such allegation  
6 shall be deemed to mean the acts of Defendants acting individually, jointly, and/or severally.

### 7 **GENERAL FACTUAL ALLEGATIONS**

8 6. At all times material, Defendant Cosby (“Cosby”) was a prominent actor and  
9 comedian.

10 7. Cosby started his career in stand-up comedy in the 1960s and rose to fame as a  
11 comedian and actor.

12 8. In approximately 1969 Plaintiff auditioned for an acting role for her professional  
13 advancement and met Cosby inside his studio trailer in Los Angeles, California.

14 9. At the audition, Plaintiff told Cosby she was a Screen Actor’s Guild Member, and  
15 she was seeking an acting job.

16 10. Plaintiff provided Cosby with a photograph of her only child, her six-year old son,  
17 and told Cosby about her son’s recent, tragic drowning.

18 11. Plaintiff stood up to leave, retrieved her son’s photograph, and as she was leaving,  
19 Cosby mumbled some incoherent words to Plaintiff and Plaintiff left.

20 12. Plaintiff encountered Cosby again in approximately late 1969 at Café Figaro in Los  
21 Angeles, California.

22 13. Plaintiff and her friend were out for dinner and Plaintiff was still coping with the  
23 death of her son. Plaintiff was inconsolably crying when Cosby approached their table.

24 14. Cosby engaged in conversation with Plaintiff’s friend while Plaintiff continued to  
25 sob over the tragic loss of her only son.

26 15. Cosby suggested to Plaintiff’s friend that she and Plaintiff go to a steam bath and  
27 get a massage at a Finnish spa on Santa Monica Boulevard. Cosby offered to pay for the spa  
28 treatments. Cosby gave Plaintiff’s friend money to pay for the spa and wrote his phone number

1 down on a scrap of paper, telling Plaintiff and her friend, “When you’re done, call me and I’ll send  
2 my car to pick you up and I’ll treat you dinner.”

3           16.     Cosby’s chauffeur picked up Plaintiff and her friend at Plaintiff’s grandmother’s  
4 house and drove them to Sneaky Pete’s, a new steakhouse on the Sunset Strip. Cosby greeted  
5 Plaintiff and her friend in the parking lot and escorted them inside to their table downstairs.

6           17.     Plaintiff, Cosby, and Plaintiff’s friend ate dinner and Cosby attempted to entertain  
7 Plaintiff and her friend with jokes and humor, but Plaintiff was disinterested.

8           18.     While seated at the table, Cosby placed a pill next to Plaintiff’s glass and stated,  
9 “Here! Take this! It will make you feel better. It will make us ALL feel better.” Cosby placed  
10 another pill next to Plaintiff’s friend’s glass.

11           19.     Upon information and belief, Cosby deceived Plaintiff by placing a pill up to his  
12 mouth with one hand, and covering it with his other hand, giving Plaintiff the impression he had  
13 swallowed the pill and that the pill was safe to ingest.

14           20.     Plaintiff ingested the pill Cosby provided her. Shortly thereafter, Cosby reached out  
15 and put another pill into Plaintiff’s mouth and then put a pill into Plaintiff’s friend’s mouth.

16           21.     After ingesting the pill, Plaintiff’s head began nodding and she struggled to keep  
17 her head up and stay awake. Plaintiff felt nauseated, and her head was spinning. She stated, “I  
18 want to go home now.” Cosby escorted Plaintiff and her friend up the stairs to the parking area.

19           22.     Cosby offered to drive Plaintiff and her friend home, claiming his chauffeur had  
20 something else to do. Plaintiff continued to feel nauseated and dizzy in the backset of Cosby’s car  
21 as he drove them in the opposite direction of Plaintiff’s house. Plaintiff was not told where she  
22 was being taken.

23           23.     When the car finally stopped, Cosby told Plaintiff and her friend that he “wanted to  
24 show them his awards in his office.” Cosby opened the front door and assisted Plaintiff’s friend  
25 out of the car and then Cosby opened the back car door, reached for Plaintiff’s arm and assisted  
26 her out of the car. Plaintiff staggered into the building and on to the elevator.

27           24.     Cosby brought Plaintiff and her friend to a second floor office and unlocked the  
28 door. Inside was a small desk and lamp, framed posters of Cosby in *I Spy*, a telephone, and two

1 small couches. Plaintiff's friend staggered to one couch and laid down and immediately passed  
2 out. Plaintiff sat down on the other couch and closed her eyes.

3 25. When Plaintiff opened her eyes, she saw Cosby sitting on the couch, adjacent to her  
4 unconscious friend's hips. Cosby was staring at Plaintiff's friend with a predatory intensity while  
5 Plaintiff's friend laid on the couch unconscious. Plaintiff panicked and saw Cosby had an erection.  
6 Plaintiff knew Cosby was about to assault her friend, so Plaintiff attempted to distract Cosby by  
7 reaching out towards him to get his attention. Plaintiff tried speaking but her words made no sense  
8 due to the effects of the pills Cosby had given Plaintiff.

9 26. Cosby finally became angry and exasperated by Plaintiff's efforts to thwart his  
10 assault on her friend, and Cosby stood up and walked towards Plaintiff with a terrifying  
11 expression on his face. Plaintiff attempted to stand up, but her legs wobbled and buckled beneath  
12 her, and she reached out to Cosby to prevent herself from falling to the floor.

13 27. Cosby sat down on the couch and unzipped his pants. Cosby forced his penis into  
14 Plaintiff's mouth. Cosby then stood Plaintiff up, turned Plaintiff around and engaged in forced  
15 sexual intercourse with Plaintiff.

16 28. Plaintiff was incapable of consent by reason of being drugged by Cosby and  
17 physically helpless.

18 29. After the sexual assault, Cosby pushed Plaintiff down on the couch, zipped his  
19 pants up and walked out the door telling Plaintiff and her friend to "Call a cab!"

20 30. Plaintiff shook her friend awake and they attempted to use the phone inside the  
21 office, but it was a prop phone and there was no phone jack. Plaintiff and her friend ran out of the  
22 office building, disoriented, trying to figure out their location. They finally found a cab to take  
23 them back to Plaintiff's house.

24 31. In a 2005 deposition, Cosby admitted that he used quaaludes on young women that  
25 he wanted to have sex with.

26 32. Cosby engaged in a similar pattern of conduct with his victims, including  
27 expressing interest in advancing their careers.

28 33. Cosby was found guilty of three counts of aggravated indecent assault in 2018 in

1 Montgomery County, Pennsylvania, and sentenced to three to ten years in prison. His conviction  
2 was overturned in 2021 by the Pennsylvania Supreme Court based on a prior prosecution  
3 agreement not to charge Cosby.

4 34. In June 2022, Cosby was found civilly liable in Santa Monica, California, for the  
5 sexual assault of a minor female.

6 **FIRST CAUSE OF ACTION**

7 **Sexual Assault (Cal. Civ. Code § 340.16)**

8 35. Plaintiff incorporates the allegations contained in the preceding paragraphs as though  
9 fully set forth herein.

10 36. Defendant Cosby committed a sexual assault, as defined in Civil Code §340.16(b)(1)  
11 (referencing sections of the California Penal Code).

12 37. Defendant Cosby committed assault with the intent to commit the crimes delineated  
13 in the above-referenced sections of the California Penal Code.

14 38. Defendant Cosby's actions identified in this complaint were his attempts to commit  
15 the crimes delineated in the above-referenced sections of the California Penal Code.

16 39. Defendant Cosby's conduct as described in this complaint was done with oppression,  
17 fraud, and/or malice.

18 40. Defendant Cosby covered up his multiple sexual assaults of women and children.

19 **SECOND CAUSE OF ACTION**

20 **Sexual Battery (Cal. Civ. Code § 1708.5)**

21 41. Plaintiff incorporates the allegations contained in the preceding paragraphs as though  
22 fully set forth herein.

23 42. Plaintiff brings this claim for sexual battery under California Civil Code § 1708.5  
24 against Defendant Cosby in his individual capacity.

25 43. Defendant Cosby willfully violated Plaintiff's statutory right to be free from sexual  
26 battery, including forcing Plaintiff to perform oral sex on him and by inserting his penis into her  
27 vagina without her consent.  
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44. Defendant Cosby's sexual assault of Plaintiff was deeply offensive to her personal dignity and would offend a person of ordinary sensitivity.

45. Defendant Cosby committed these acts with intent to cause harmful or offensive contact with Plaintiff's person.

46. By intentionally subjecting Plaintiff to sexual assault, Defendant Cosby acted maliciously and in a manner that is deeply offensive to human dignity.

47. As a direct, proximate, and foreseeable result of Defendant Cosby's unlawful conduct, Plaintiff has suffered severe humiliation, mental anguish, emotional distress, embarrassment, anger, loss of enjoyment of life, loss of earnings and earning capacity, and has been injured in mind and body, the precise amount of which will be proven at trial.

48. As a direct, proximate, and foreseeable result of Defendant Cosby's unlawful conduct, Plaintiff has incurred special and general damages, the precise amount of which will be proven at trial.

49. Defendant Cosby acted maliciously and oppressively, and his conduct constitutes conscious disregard for Plaintiff's rights and safety, entitling her to punitive damages.

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff requests that the Court enter a judgment awarding the following  
3 relief:

- 4 (1) General damages according to proof;  
5 (2) Special damages, including but not limited to medical and incidental expenses and  
6 loss of earnings and earning capacity according to proof;  
7 (3) Punitive damages, as permitted by law;  
8 (4) Attorneys' fees pursuant to Code of Civil Procedure Section 1021.5, or otherwise  
9 as permitted by law;  
10 (5) Costs of suit;  
11 (6) Prejudgment interest as permitted by law; and  
12 (7) Such other relief as the Court deems proper.

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15 DATED: June 1, 2023

**JEFF ANDERSON & ASSOCIATES PA**

16  
17 *Mike Reck*

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19 MICHAEL RECK  
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**DEMAND FOR JURY TRIAL**

A trial by jury is hereby demanded by Plaintiff.

DATED: June 1, 2023

**JEFF ANDERSON & ASSOCIATES PA**



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MICHAEL RECK  
JEFF ANDERSON & ASSOCIATES, P.A.  
Attorneys for Plaintiff Victoria Valentino  
A/K/A Victoria Carbé-Chen