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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9

**COUNTY OF LOS ANGELES**

10 Jane Doe XX,

11 Plaintiff,

12 v.

13 Daniel Elfman, an individual; Musica De La  
Muerte, Inc. f/k/a Little Maestro Music  
14 Limited, Inc., a California corporation; and  
DOES 1–20,

15 Defendants.

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Case No.

**COMPLAINT FOR DAMAGES for:**

- 1) **SEXUAL ASSAULT;**
- 2) **GENDER VIOLENCE;**
- 3) **INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS;**
- 4) **SEXUAL HARASSMENT; and**
- 5) **NEGLIGENCE**

**DEMAND FOR JURY TRIAL**

**PARTIES**

1. Plaintiff is an adult female currently residing in Maryland. Plaintiff was the victim of adult sexual abuse and exploitation. At the time of the sexual abuse, Plaintiff was a resident of Los Angeles County, California. The sexual abuse occurred in Los Angeles County, California.

2. Defendant Daniel Elfman (“Defendant Elfman”) is a resident of Los Angeles County, California. At the time of the sexual abuse, from approximately 1997 to 2002, Defendant Elfman was the President and/or Chief Executive Officer and/or Secretary and/or Chief Financial Officer of Musica De La Muerte, Inc. f/k/a Little Maestro Music Limited, Inc.

1           3.       Upon information and belief, Defendant Musica De La Muerte, Inc. was located at  
2 2049 Century Park East, Suite 1400, Los Angeles, California 90067 at the time of the sexual  
3 abuse. Musica De La Muerte, Inc. is a California corporation formed in 1986. Upon information  
4 and belief, Musica De La Muerte, Inc. has an office in California at 2049 Century Park East, Suite  
5 1400, Los Angeles, California 90067.

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

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

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

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1 **JURISDICTION AND VENUE**

2 7. 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 8. Venue is proper in this Court because Plaintiff resided in the county during all time  
6 relevant to this action; all Defendants either reside in this county, do business in this county,  
7 and/or committed the wrongful acts alleged herein within the County of Los Angeles.

8 9. The amount in controversy, exclusive of interest and costs, exceeds the  
9 jurisdictional minimum of this Court. Accordingly, this Court has jurisdiction over the case at bar.

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11 **PLAINTIFF’S FACTUAL ALLEGATIONS**

12 10. Defendant Elfman is a four-time Oscar nominated, Grammy award winning, and  
13 two-time Emmy award winning American film composer, singer, songwriter, and musician. He  
14 was the lead singer and primary songwriter for the band Oingo Boingo in the early 1980s. In 1985,  
15 he scored his first studio film, and proceeded to garner international recognition for composing  
16 over 100 feature film scores, as well as compositions for television, stage productions, and the  
17 concert hall.

18 11. Defendant Elfman approached Plaintiff in approximately April of 1997 at the home  
19 of a mutual friend, and they immediately connected. Plaintiff was a student at the New York Film  
20 Academy, and had previously attended music school, so this common interest in music and film  
21 catalyzed their connection.

22 12. Plaintiff was young, naïve, and eager for help to be able to make it in the music and  
23 film industry. Plaintiff was approximately 21 years old at the time she met Defendant Elfman, and  
24 Defendant Elfman was approximately 47 years old.

25 13. Defendant Elfman then began grooming Plaintiff with the intent to manipulate her  
26 emotions and take advantage of her so that he could ultimately sexually abuse and exploit the  
27 Plaintiff.

28 14. Over the course of the next year, Defendant Elfman stayed in touch with Plaintiff

1 and invited her to come hang out in his hotel rooms when he was in town or go to events.

2 Defendant Elfman lived in Los Angeles, but would frequently come to New York.

3 15. On one occasion, Defendant Elfman was filming the Oscar-winning movie, *Good*  
4 *Will Hunting*, and he invited Plaintiff to cast and crew outings and events.

5 16. Defendant Elfman initiated deep conversations with Plaintiff about film and music,  
6 and often asked for her opinion on different work matters. For example, Defendant Elfman was  
7 working on the score for the movie “*The Mummy*” and was required to make certain decisions  
8 about it. Defendant Elfman asked Plaintiff for her opinion and made decisions based on Plaintiff’s  
9 opinion for his work.

10 17. Defendant Elfman treated Plaintiff both like a consultant and protégé. Plaintiff was  
11 made to feel like she had a meaningful impact on his work, but was also benefitting from his  
12 mentorship and notoriety in furthering her career.

13 18. One night, after a few times of Defendant Elfman and Plaintiff spending time  
14 together, Defendant Elfman and Plaintiff were hanging out in his hotel room at the Mercer Hotel  
15 in New York City. Defendant Elfman suddenly removed all of his clothing until he was  
16 completely nude, and walked around naked in front of Plaintiff, exposing his genitals. He  
17 proceeded to go in front of the open window and stand there in an effort to expose his naked body  
18 and genitals. Defendant Elfman then coerced Plaintiff to take her clothing off and stand naked  
19 with him in front of the open windows in full view of the public. Defendant Elfman told Plaintiff  
20 that he hoped someone would look at them and that it was fun.

21 19. Plaintiff felt uncomfortable being naked in front of him, so she left the window and  
22 put her clothes back on. Defendant Elfman remained nude in front of the window for another five  
23 minutes.

24 20. On the following occasion they saw each other, Defendant Elfman stripped nude  
25 and exposed his genitals again, and started taking a bath. He insisted that Plaintiff come to the  
26 bathroom and watch him take a bath.

27 21. Going forward, any time that Plaintiff and Defendant Elfman spent time together,  
28 Defendant Elfman removed all of his clothing until he was completely nude, and walked around

1 nude in front of Plaintiff, exposing his genitals. Defendant Elfman expressed to Plaintiff that this  
2 was the only way he could work, be creative, and successful.

3 22. Plaintiff felt uncomfortable, but did not say anything because she did not want to  
4 risk losing him as a friend and mentor, given what she perceived to be a very lucky position she  
5 was in, as a consultant for his work and protégé.

6 23. Each and every time Plaintiff spent time with Defendant Elfman in his hotel rooms,  
7 she slept in the same bed as Defendant Elfman, never removing her clothing, often sleeping on top  
8 of the bedding. Defendant Elfman always slept naked next to Plaintiff. Plaintiff estimates this  
9 occurred approximately seven times.

10 24. Due to Defendant Elfman’s power, prominence, and highly regarded reputation in  
11 the entertainment industry, Plaintiff always felt the imbalance of power and pressure to act a  
12 certain way around Defendant Elfman. Plaintiff felt like she had no choice but to always comply  
13 with his requests, and Plaintiff felt this was a condition of their continued relationship.

14 25. In approximately 1998, Plaintiff expressed a desire to move to Los Angeles,  
15 California to advance her career. Defendant Elfman told Plaintiff “Come stay with me and I will  
16 help you out” and invited Plaintiff to stay at his extraordinary home in Topanga, California while  
17 Plaintiff searched for a vehicle and place to live.

18 26. Plaintiff lived at Defendant Elfman’s home for several weeks. Defendant Elfman  
19 was often nude and exposing his genitals in the house in front of Plaintiff. On one occasion, he  
20 coerced Plaintiff to take off her clothes too, which she complied because she felt that she owed  
21 him a little more than just tolerating his nudity.

22 27. Plaintiff found her own home in East Hollywood, and continued to see Defendant  
23 Elfman approximately once a month for the next two years. Their meetings would always be at  
24 Defendant Elfman’s home, and Plaintiff always spent the night.

25 28. Their professional relationship cultivated, with Defendant Elfman always asking  
26 Plaintiff for professional advice, while being simultaneously in tune with Plaintiff’s professional  
27 interests and aspirations.

28 29. Defendant Elfman often involved Plaintiff with activities such as going to the Sony

1 Pictures Studio in Culver City, California to witness a recording of a score written by Defendant  
2 Elfman.

3 30. Defendant Elfman often told Plaintiff that she was “so smart”, “really understand  
4 this stuff”, and had “something to offer”. Plaintiff continued to hold on to the hope that he would  
5 jumpstart her music and film career any day.

6 31. One day, in approximately 2002, Plaintiff was spending time with Defendant  
7 Elfman in his home when Defendant Elfman suddenly made the following revelation to Plaintiff:  
8 “Every time you have ever slept next to me, I would masturbate next to you.”

9 32. Plaintiff was horrified and shocked. Defendant Elfman further explained that he  
10 enjoyed watching her sleep and would masturbate to her, anytime and every time. His fetish,  
11 which she did not consent to being a part of, required her to be sleeping.

12 33. Defendant Elfman and Plaintiff had slept next to each other approximately 40 times  
13 or more.

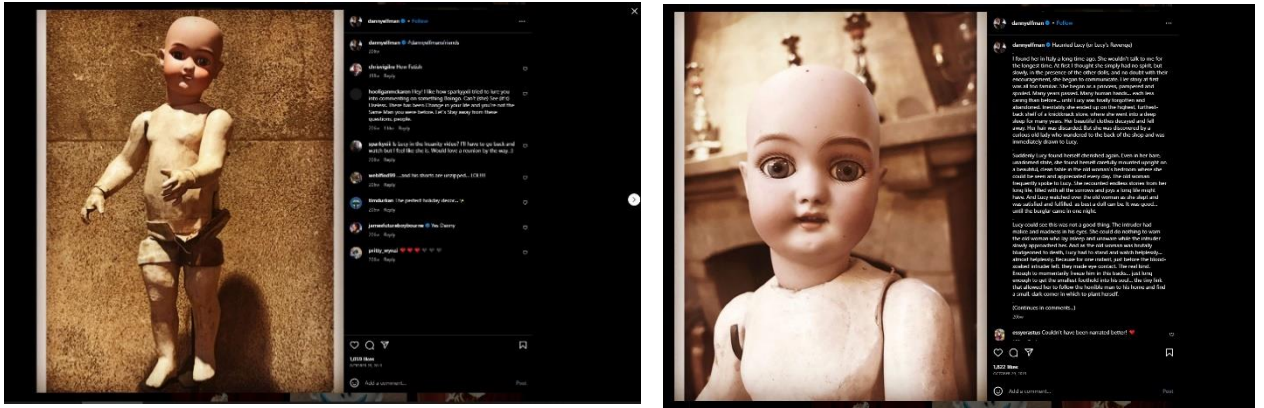
14 34. For over four years, Defendant Elfman had covered up the fact that he was  
15 systematically engaging in lewd conduct towards Plaintiff. Under the guise of a mentor and  
16 mentee relationship, where the mentor was powerful and famous, Defendant Elfman kept Plaintiff  
17 around so he could continue the sexual abuse while she was awake (by walking around nude and  
18 exposing his genitals) and when she was asleep next to him (by masturbating to her).

19 35. Plaintiff does not know if Defendant Elfman physically touched her while he was  
20 masturbating and did not have a chance to ask him when he made the masturbation revelation, but  
21 she believes that it is highly probable that he did physically touch her to an effort to enhance his  
22 sexual gratification.

23 36. Plaintiff immediately ended the friendship with Defendant Elfman ended after this  
24 disclosure.

25 37. Defendant Elfman has a collection of broken vintage dolls that he has displayed  
26 throughout his home. Plaintiff realized after Defendant Elfman’s disclosure of his sexual acts that  
27 Plaintiff was one of the broken dolls on his bed—she had to be asleep, inanimate, and under  
28 complete control by Defendant Elfman.

1 38. Defendant Elfman was using the nudity, coupled with his clear power as a  
2 successful public figure in the film and music industry, as a form of control. His revelation that he  
3 masturbated over her was without her consent or knowledge.



12 39. After Defendant Elfman’s disclosure, Plaintiff suffered great shock and humiliation  
13 and shame, Plaintiff disclosed Defendant Elfman’s admission to several of Plaintiff’s trusted  
14 colleagues who stated there is nothing Plaintiff could or should do given “who he is” in the  
15 entertainment industry.

16 40. On or about July 19<sup>th</sup>, 2023, Plaintiff read a Rolling Stone article titled “*Danny*  
17 *Elfman Settled a Sexual – Harassment Allegation for \$830,000.*” The article stated Defendant  
18 Elfman sexually assaulted his former protégé Nomi Abadi approximately 13 to 15 years after  
19 sexually assaulting Plaintiff. Plaintiff and Nomi Abadi share physical characteristics. Defendant  
20 Elfman claimed he maintained platonic relationships with both victims. Defendant Elfman  
21 exposed his genitals and masturbated in both victims’ presence. Upon reading this article,  
22 Plaintiff realized she was not the only one Defendant Elfman did this to and the similarities of  
23 Abadi’s account mirrored Plaintiff’s own experiences but happened years apart.

24 41. Based on information and belief, other individuals were sexually assaulted in the  
25 same manner before Plaintiff, and Defendants and Does 1 through 20 engaged in coverups to  
26 ensure information regarding such sexual assaults were not made public or disclosed to anyone.

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**PLAINTIFF’S LAWSUIT IS TIMELY**

42. Plaintiff brings her claims pursuant to the Sexual Abuse and Cover Up Accountability Act, AB2777. California Civil Procedure Code § 340.16(e) provides that a claim seeking to recover damages suffered as a result of a sexual assault that occurred on or after a plaintiff’s 18th birthday otherwise barred may be brought subject to this act between January 1, 2023 and December 31, 2023. Plaintiff’s lawsuit also complies with requirements of this code.

**FIRST CAUSE OF ACTION**

**SEXUAL ASSAULT (Cal. Civ. Code § 340.16)**

**(Against All Defendants and DOES 1-20)**

43. Plaintiff incorporates the allegations contained in the preceding paragraphs as though fully set forth herein.

44. Defendant Elfman and Does 1 through 20, in committing the acts herein alleged, intended to subject the Plaintiff to sexual abuse, all while Defendant Elfman and Does 1 through 20 acted in the course and scope of their agency/employment with Defendants. In so doing, Defendant Elfman and Does 1 through 20 intended to cause harmful or offensive contact with the Plaintiff’s person, and/or intended to put the Plaintiff in imminent apprehension of such contact.

45. In doing the acts herein alleged, Defendant Elfman and Does 1 through 20 placed the Plaintiff in imminent apprehension of harmful or offensive contact by Defendant Elfman and Does 1 through 20, and the Plaintiff actually and reasonably believed that Defendant Elfman and Does 1 through 20 had the ability to make harmful or offensive contact with Plaintiff’s persons.

46. Plaintiff did not consent to Defendant Elfman and Does 1 through 20’s intended harmful or offensive contact with the Plaintiff’s persons, or to Defendant Elfman and Does 1 through 20’s intent to place the Plaintiff in imminent apprehension of such contact.

47. In committing the acts herein alleged, Defendant Elfman and Does 1 through 20 violated the Plaintiff’s right, pursuant to Civil Code section 43, of protection from bodily restraint or harm, and from personal insult. In committing the acts herein alleged, Defendant Elfman and



1 Does 1 through 20 violated their duty, pursuant to Civil Code section 1708, to abstain from  
2 injuring the persons of the Plaintiff or infringing upon her rights.

3 48. As a direct and proximate result of the conduct of Defendants, individually, jointly,  
4 and/or severally, the Plaintiff sustained severe emotional distress and physical pain, emotional  
5 anguish, fear, anxiety, humiliation, embarrassment, and other physical and emotional injuries,  
6 damages (both economic and noneconomic), and permanent disability, in the past, present, and  
7 future, for which this claim is made. The injuries suffered by Plaintiff are substantial, continuing,  
8 and permanent.

9 49. Plaintiff is informed, and based thereon alleges, that the conduct of Defendant  
10 Elfman and Does 1 through 20 was oppressive, malicious, and despicable in that it was intentional  
11 and done in conscious disregard for the rights and safety of others, and were carried out with a  
12 conscious disregard of their right to be free from such tortious behavior, such as to constitute  
13 oppression, fraud, or malice pursuant to California Civil Code section 3294, entitling the Plaintiff  
14 to punitive damages against Defendant Elfman and Does 1 through 20 in an amount appropriate to  
15 punish and set an example of Defendant Elfman and Does 1 through 20.

16  
17 **SECOND CAUSE OF ACTION**

18 **GENDER VIOLENCE (Cal. Civ. Code § 52.4)**

19 **(Against All Defendants and DOES 1-20)**

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

22 51. Defendants and Does 1 through 20's acts committed against Plaintiff, as alleged  
23 herein, including the sexual harassment and abuse of Plaintiff, constitutes gender violence and a  
24 form of sex discrimination in that one or more of Defendants and Does 1 through 20's acts would  
25 constitute a criminal offense under state law that has, as an element, the use, attempted use, or  
26 threatened use of physical force against the person of another, committed at least in part based on  
27 the gender of the victim, whether or not those acts have resulted in criminal complaints, charges,  
28 prosecution, or conviction.

1           52. Defendants and Does 1 through 20's acts committed against the Plaintiff, as alleged  
2 herein, including the sexual abuse, molestation, and harassment of the Plaintiff, constitutes gender  
3 violence and a form of sex discrimination in that Defendants and Does 1 through 20's conduct  
4 caused a physical intrusion or physical invasion of a sexual nature upon the Plaintiff under  
5 coercive conditions, whether or not those acts have resulted in criminal complaints, charges,  
6 prosecution, or conviction.

7           53. Plaintiff was subjected to Defendant Elfman physical intrusion/invasion of a sexual  
8 nature under coercive conditions. Defendant Elfman made a physical intrusion/invasion of a  
9 sexual nature including, but not limited to, exposing his genitals and masturbating in bed next to  
10 Plaintiff as she slept. The conditions were coercive because Plaintiff trusted Defendant Elfman and  
11 did not consent to the sexual acts.

12           54. As a proximate result of Defendants' actions, Plaintiff is entitled to actual damages,  
13 compensatory damages, punitive damages, injunctive relief, any combination of those, or any  
14 other appropriate relief. Plaintiff is also entitled to attorney's fees and costs awarded as pursuant to  
15 Civil Code § 52.4, against Defendants.  
16

17                                   **THIRD CAUSE OF ACTION**

18                                   **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

19                                   **(Against All Defendants and DOES 1 through 20)**

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

22           56. At the time of the incidents described above, Defendants and agents and/or  
23 employees' conduct as alleged herein was beyond the bounds of decency accepted within society  
24 and was intentional, outrageous, malicious, and committed for the purpose of causing Plaintiff to  
25 suffer humiliation, embarrassment, mental anguish, and/or severe physical and/or emotional  
26 distress, or done in reckless disregard of the probability of causing Plaintiff to suffer humiliation,  
27 embarrassment, mental anguish, and/or severe physical and/or emotional distress.

28           57. Defendants and agents and/or employees, and each of them, were in a position of

1 authority, trust, influence and persuasion over Plaintiff and responsible for maintaining a special  
2 relationship.

3 58. Defendant Elfman and Does 1 through 20's abuse of Plaintiff was an abuse of their  
4 authority as an agent and/or employee of Defendants and agents and/or employees and performed  
5 while in the course and scope of their employment under color of law.

6 59. Plaintiff's trust in Defendants and agents and/or employees for their safety and  
7 wellbeing, turned to fear and intimidation by virtue of DOES 1 through 20 and Defendants and  
8 agents and/or employees' wrongful conduct.

9 60. Plaintiff contends that said misconduct was authorized, ratified, adopted and/or  
10 approved of by Defendants and agents and/or employees.

11 61. Defendants and agents and/or employees conduct as alleged herein was beyond the  
12 bounds of decency accepted within society and was intentional, outrageous, malicious, and  
13 committed for the purpose of causing Plaintiff to suffer humiliation, embarrassment, mental  
14 anguish, and/or severe physical and/or emotional distress or done in reckless disregard of the  
15 probability of causing Plaintiff to suffer humiliation, embarrassment, mental anguish, and/or  
16 severe physical and/or emotional distress.

17 62. As a direct and proximate result of the conduct as herein alleged, Plaintiff has  
18 suffered great mental pain, embarrassment, humiliation, distress, anguish, and suffering, all to her  
19 damages in an amount according to proof at trial.

20 63. Defendants and agents and/or employees' conduct described herein was intentional  
21 and malicious and done for the purpose of causing, or with the substantial certainty that such  
22 conduct would cause, the Plaintiff to suffer humiliation, mental anguish, and emotional and  
23 physical distress.

24 64. Defendants and agents and/or employees acted willfully and maliciously with the  
25 intent to harm the Plaintiff, and in conscious disregard of the Plaintiff's rights, so as to constitute  
26 malice and/or oppression under California Civil Code section 3294 thereby entitling Plaintiff to  
27 punitive damages according to proof.

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1 **FOURTH CAUSE OF ACTION**

2 **SEXUAL HARASSMENT (CIVIL CODE §51.9)**

3 **(Against All Defendants and DOES 1 through 20)**

4 65. Plaintiff re-allege and incorporates the allegations contained in the preceding  
5 paragraphs as though fully set forth herein.

6 66. Plaintiff had a business, service, and/or professional relationship with Defendants.

7 67. Defendants and Does 1 through 20 intentionally, recklessly, and wantonly made  
8 sexual advances, solicitations, requests, demands for sexual compliance of a hostile nature based  
9 on Plaintiff's gender that were unwelcome, pervasive, and severe, all under the supervision of  
10 Defendants, who were acting in the course and scope of their agency with Defendants and each of  
11 them.

12 68. The incidents of abuse outlined herein above took place while Plaintiff was under  
13 the immediate and direct control and direction of Defendants and Does 1 through 20.

14 69. Defendants and Does 1 through 20 intentionally, recklessly, and wantonly did acts  
15 which resulted in harmful and offensive contact with intimate parts of the Plaintiff's person,  
16 including but not limited to, using their position of authority, power, position, and age to force the  
17 Plaintiff to give into Defendant Elfman and Does 1 through 20's sexual suggestions, demands, and  
18 orders.

19 70. Plaintiff was constructively prevented from terminating or escaping direct and  
20 pervasive contact with the Defendants.

21 71. Because of Defendants and Does 1 through 20's authority, position, power, and  
22 Plaintiff's vulnerability, Plaintiff was unable to, did not, and could not, give consent to such acts.

23 72. Because of the Plaintiff's relationship with Defendants, Plaintiff was unable to  
24 terminate or escape their direct and pervasive contact with the Defendants.

25 73. Defendants' conduct was a breach of their duties to Plaintiff.

26 74. As a direct and proximate result of the conduct of Defendants, individually, jointly,  
27 and/or severally, the Plaintiff sustained severe emotional distress and physical pain, emotional  
28 anguish, fear, anxiety, humiliation, embarrassment, and other physical and emotional injuries,

1 damages (both economic and noneconomic), and permanent disability, in the past, present, and  
2 future, for which this claim is made. The injuries suffered by Plaintiff is substantial, continuing,  
3 and permanent.

4  
5 **FIFTH CAUSE OF ACTION**

6 **NEGLIGENCE**

7 **(Against All Defendants and DOES 1 through 20)**

8 75. Plaintiff re-alleges and incorporates the allegations contained in the preceding  
9 paragraphs as though fully set forth herein.

10 76. Defendants knew and/or should have known that Defendant Elfman and Does 1  
11 through 20 did and were capable of sexually and mentally abusing and harassing the Plaintiff,  
12 prior to and after the first incident of Defendant Elfman and Does 1 through 20's sexual  
13 harassment and abuse of Plaintiff.

14 77. Defendants had special duties to protect the Plaintiff. The duty to protect and warn  
15 arose from the special, trusting, confidential, and fiduciary relationship between Defendants and  
16 Plaintiff.

17 78. Defendants breached their duties of care to Plaintiff by allowing Defendant Elfman  
18 and Does 1 through 20 to come into contact with Plaintiff, and by concealing from the Plaintiff,  
19 that Defendant Elfman and Does 1 through 20 had perverted tendencies.

20 79. Defendants breached their duties to Plaintiff by failing to investigate or otherwise  
21 confirm or deny such facts of sexual abuse and harassment by Defendant Elfman and Does 1  
22 through 20.

23 80. Defendants breached their duty to Plaintiff by failing to prevent Defendant Elfman  
24 and Does 1 through 20 from committing wrongful sexual acts with Plaintiff.

25 81. As a direct and proximate result of the conduct of Defendants, individually, jointly,  
26 and/or severally, the Plaintiff sustained severe emotional distress and physical pain, emotional  
27 anguish, fear, anxiety, humiliation, embarrassment, and other physical and emotional injuries,  
28 damages (both economic and noneconomic), and permanent disability, in the past, present, and

1 future, for which this claim is made. The injuries suffered by the Plaintiff are substantial,  
2 continuing, and permanent.

3  
4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff requests that the Court enter a judgment awarding the following  
6 relief against Defendants:

- 7 (1) Past, present, and future general damages according to proof;  
8 (2) Past, present, and future special damages, including but not limited to medical and  
9 incidental expenses and loss of earnings and earning capacity according to proof;  
10 (3) Any appropriate punitive or exemplary damages;  
11 (4) Any appropriate statutory damages;  
12 (5) Reasonable attorneys' fees and costs, including expert witness fees, pursuant to  
13 Cal. Civ. Code § 52.4.  
14 (6) Costs of suit;  
15 (7) Prejudgment interest as permitted by law; and  
16 (8) Such other relief as the Court deems proper.

17  
18 DATED: October 19, 2023

**JEFF ANDERSON & ASSOCIATES, P.A.**

19  
20 *Mike Reck*

21 \_\_\_\_\_  
22 MICHAEL RECK  
23 NEDA LOTFI  
24 *Attorneys for Plaintiff JANE DOE XX*

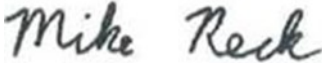
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**DEMAND FOR JURY TRIAL**

A trial by jury is hereby demanded by Plaintiff.

DATED: October 19, 2023

**JEFF ANDERSON & ASSOCIATES, P.A.**



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MICHAEL RECK  
NEDA LOTFI  
*Attorneys for Plaintiff JANE DOE XX*