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FILED
LOS ANGELES SUPERIOR COURT

MAY 22 2009

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MAY 22 2009

NORTH DISTRICT
CIVIL DEPARTMENT

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8
9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF LOS ANGELES - NORTH DISTRICT

11 MC020465

12 RICHELLE OLSON and LANCE OLSON)

CASE NO.

13 Plaintiffs,)

COMPLAINT FOR:

14 vs)

- 15) 1. ASSAULT
- 16) 2. BATTERY
- 17) 3. NEGLIGENCE
- 18) 4. INTENTIONAL INFLICTION OF
- 19) EMOTIONAL DISTRESS
- 20) 5. NEGLIGENT INFLICTION OF
- 21) EMOTIONAL DISTRESS
- 22) 6. CONSPIRACY TO DEFRAUD
- 23) 7. UNFAIR COMPETITION
- 24) 8. INTENTIONAL CONCEALMENT
- 25) 9. FALSE PROMISE
- 26) 10. FRAUDULENT
- 27) MISREPRESENTATION
- 28) 11. LOSS OF CONSORTIUM

15 SACHA BARON COHEN, NBC
16 UNIVERSAL, INC., COLD STREAM
17 PRODUCTIONS, LLC, MRC II
18 DISTRIBUTION COMPANY, L.P.,
19 MEDIA RIGHTS CAPITAL II, L.P.,
EVERYMAN PICTURES, MONICA
20 LEVINSON, and DOES 1 through 100, et
21 al.,

22 Defendants.)

23
24 COME NOW Plaintiffs, RICHELLE OLSON and LANCE OLSON for
25 the above-captioned Defendants, and each of them, allege:

26 **L PARTIES**

27 1. At all times mentioned herein, Plaintiffs RICHELLE OLSON and LANCE OLSON
28 residents of the County of Los Angeles, California during all the time relevant hereto.

1
COMPLAINT FOR DAMAGES

CIT/CASE-LEVINSON'S LEA/REH:
RECEIPT NO. AT-48271002
DATE PAID 05/22/09 09:33:45 PM
PAYMENT \$450.00
RECEIVED
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380

1 2. Plaintiff is informed and believes and thereon alleges that Defendants are, and at all times
2 herein mentioned were, residents of the County of Los Angeles, State of California.

3 3. Plaintiff is informed and believes and thereon alleges that at all times relevant herein, the
4 individual Defendants and DOES 1 through 100, and each of them were owners, operators, employees, or
5 authorized agents of Defendant, and at all times mentioned herein were acting within the course and
6 scope of their employment or agency for Defendant, SACHA BARON COHEN or any company or
7 corporate form, which is unknown to Plaintiff at this time, which is liable in respondent superior for the
8 Plaintiff's injuries.

9 4. The true names and capacities of the DEFENDANTS sued herein as DOES 1 through 100
10 ("DOES"), inclusive, are unknown to PLAINTIFF who therefore has sued said DEFENDANTS by such
11 fictitious names. PLAINTIFF will seek leave to amend this Complaint to set forth their true names and
12 capacities when and if the same are ascertained. PLAINTIFF is informed and believes and thereon
13 alleges that each of the DEFENDANTS sued herein as a DOE is, and at all times material hereto was,
14 legally responsible in some manner for one or more of the acts, omissions, breaches, occurrences, losses
15 and damages herein complained of, and further, that each DOE is, and at all times material hereto was,
16 acting as an agent, servant, employee, representative, managing agent, partner, principal alter ego,
17 affiliate, or co-conspirator of one or more of the other DEFENDANTS, with the knowledge, consent, and
18 ratification of such other DEFENDANTS in causing or permitting the acts, omissions, breaches,
19 occurrences, losses and damages herein complained of. PLAINTIFF is informed and believes that each of
20 the DOES 1 through 50 is a business, form unknown, whose principle place of business is in Los Angeles
21 County, and each of the DOES 51 through 100 are individuals who reside in Los Angeles County.

22 5. Plaintiffs further alleges on information and belief, at all times herein mentioned, each of
23 the Defendants sued herein as DOE was the agent, principal, employee, employer, joint venture, co-
24 conspirator, partner, representative, or alter ego of the other Defendants within the purpose, course and
25 scope of such agency, employment, joint venture, conspiracy, partnership, or within such representative
26 or alter ego capacity. Plaintiffs are further informed and believe, and thereon allege, defendants acted in
27 concert with other Defendants in doing, or causing to be done, the wrongful acts herein alleged.

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II. JURISDICTION AND VENUE

6. The amount in controversy exceeds the jurisdictional limitations of the Court. Further, this Court has jurisdiction over all causes of action asserted herein pursuant to the California Constitution, Article XI, §10, because this case is a cause not given by statute to other trial courts.

7. This Court has jurisdiction over Defendants because each Defendant is a resident of California, does sufficient business in California, has sufficient minimum contacts with California, and intentionally avails itself of the opportunity to conduct business within California through the marketing and rental of its properties in California to render the exercise of jurisdiction by the California courts permissible under traditional notions of fair play and substantial justice.

8. This Court is the proper court because bodily injury to Plaintiffs occurred in this jurisdiction.

III. GENERAL ALLEGATIONS

9. On or about May 24, 2007, Defendant, SACHA BARON COHEN and DOES 1 through 100, and each of them, came to the location of 2101 E. Palmdale Boulevard, in the City of Palmdale, County of Los Angeles State of California.

10. The Plaintiff RICHELLE OLSON, the Executive Director of Desert Valley Charities, a duly organized corporate not-for-profit charity, was overseeing a charity bingo game to benefit nursing students who need financial assistance to attend their graduation ceremonies on May 24, 2007.

11. SACHA BARON COHEN is an actor best known for creating outrageous character disguises showcased on television through the series, "The Ali G Show" and on film through his most recent full length feature release "Borat". SACHA BARON COHEN never appears in film or television projects as himself.

12. The history of SACHA BARON COHEN and his film and television productions are based on deceit, fraud and misrepresentations that are solely for the purpose of shocking the conscience and to elicit abnormal reactions of various human targets that are subjected to humiliation and embarrassment purely for entertainment value.

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1.
2 13. SACHA BARON COHEN targeted Plaintiff RICHELLE OLSON by sending a fax from
3 one of his greater than 30 fraudulent corporations that setup websites and mission statements to mislead
4 individuals from discovering the true identity and purpose of the requested appearance by Defendants and
5 SACHA BARON COHEN.

6 14. Defendants and each of them concealed and lied about their true intentions by telling
7 Plaintiff that a "celebrity" wanted to call the bingo numbers at the charity hall managed by Plaintiff
8 RICHELLE OLSON. The "celebrity" was actually SACHA BARON COHEN acting as his character
9 "Bruno", an effeminate acting Austrian.

10 15. Plaintiff RICHELLE OLSON was an ideal target because she was located in a remote area
11 of Los Angeles County and had access to a bingo hall with many elderly and retired individual patrons
12 who would be unfamiliar with SACHA BARON COHEN's outrageous character disguises ensuring the
13 maximum affect and humiliation on Plaintiff RICHELLE OLSON.

14 16. Acting now as the caricature, "Bruno", all Defendants, SACHA BARON COHEN and
15 DOES 1 through 100 used a similar pattern of fraudulent behavior and modus operandi as used in the film
16 "Borat" and on Defendants televised show, "The Ali G Show" to lure Plaintiff RICHELLE OLSON into
17 the lair of SACHA BARON COHEN to cause maximum humiliation.

18 17. The character "Bruno" is an extreme, outrageous, offensive caricature of a gay man
19 dressed in sexually revealing clothing with an Austrian accent meant to illicit a response from individuals
20 through vulgar, sexually charged statements.

21 18. Defendant SACHA BARON COHEN began calling the second of two bingo games and
22 started using vulgar and offensive language over the loud speaker system of the bingo hall. The bingo
23 players are predominantly elderly residents whom Plaintiff RICHELLE OLSON has known for years and
24 thus felt violated by the actions of SACHA BARON COHEN.

25 19. Plaintiff RICHELLE OLSON approached and entered the stage area where the bingo was
26 being called by SACHA BARON COHEN and asked him to stop, which he did not stop.

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COMPLAINT FOR DAMAGES

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1 As Plaintiff RICHIELLE OLSON reached for the microphone Defendant SACHA BARON
 2 COHEN had in his possession, a physical struggle ensued as Defendant SACHA BARON COHEN then
 3 offensively touched, pushed and battered the Plaintiff RICHIELLE OLSON causing her to fall to the
 4 ground.
 5 Simultaneously, as Defendant SACHA BARON COHEN battered Plaintiff RICHIELLE
 6 OLSON, Defendants ordered three cameramen and two sound employees to rush the stage where
 7 Defendants attacked Plaintiff RICHIELLE OLSON for a period of one to five minutes to intentionally
 8 create a dramatic emotional response by Plaintiff RICHIELLE OLSON while Defendants recorded her
 9 humiliation and embarrassment.
 10 After the physical struggle with Defendant SACHA BARON COHEN, Plaintiff
 11 RICHIELLE OLSON, disturbed and mortified, fled the stage and into a side room in an attempt to calm
 12 herself down from SACHA BARON COHEN's calculated, planned and illicit attack upon her.
 13 Within a few seconds, an employee of United Desert Charities came into the side room to
 14 check on Plaintiff RICHIELLE OLSON's well being, finding Plaintiff RICHIELLE OLSON sobbing
 15 uncontrollably. Plaintiff RICHIELLE OLSON stood up, and as a result of the altercation with Defendants
 16 was rendered unconscious, falling forward onto the thinly covered concrete slab, passing out and causing
 17 her to hit her head.
 18 Plaintiff RICHIELLE OLSON was rushed to the hospital by paramedics with a diagnosis of
 19 two brain bleeds.
 20 Plaintiff RICHIELLE OLSON has been confined to a wheelchair and walker since the
 21 incident and under the constant care of multiple doctors for the physical pain and suffering and mental
 22 damage caused by SACHA BARON COHEN and each Defendant.
 23 All Defendants, SACHA BARON COHEN and DOES 1 through 100, and each of them,
 24 are in the business of deceit and lies for the sake of entertainment and financial gain. Defendants'
 25 repeated conduct is to intentionally target innocent bystanders such as Plaintiff RICHIELLE OLSON with
 26 impunity.
 27
 28

1 27. It is clearly foreseeable that such egregious conduct was to elicit a shock response by
2 Plaintiff RICHELLE OLSON for which all Defendants, SACHA BARON COHEN and DOES 1 through
3 100 created the character "Bruno" for pecuniary gain which directly caused the physical and mental
4 suffering Plaintiff RICHELLE OLSON now endures. Plaintiff RICHELLE OLSON has been injured
5 physically and psychologically and now requires constant and recurring medical and emotional care by a
6 team of medical specialists.

7 **FIRST CAUSE OF ACTION**

8 **(Assault as Against All Defendants by Plaintiff RICHELLE OLSON)**

9 28. Plaintiff incorporates by reference the allegations contained in paragraphs 1-27, and each
10 and every part thereof with the same force and effect as though set out at length herein.

11 29. At the time and place aforesaid, all Defendant SACHA BARON COHEN and DOES 1
12 through 100, intentionally, willfully, wantonly and maliciously grabbed Plaintiff's arm in such a manner
13 so as to cause Plaintiff to reasonably believe she was about to be touched in a harmful and offensive
14 manner.

15 30. At no time during the events described in the preceding paragraph, nor at any time prior
16 thereto, did Plaintiff consent to any of Defendant, SACHA BARON COHEN'S, and DOES 1 through
17 100's physical touching conduct.

18 31. The assault committed by SACHA BARON COHEN was aided, abetted, counseled, and
19 encouraged by the complicit behavior of all other Defendants to the instant action by Defendants
20 transporting, coordinating, financing and direction at the site of the assault by SACHA BARON COHEN
21 against Plaintiff.

22 32. As a direct, legal and proximate result of the actions by reason of the wrongful, intentional
23 and malicious acts of all Defendants, SACHA BARON COHEN, and DOES 1 through 100, and each of
24 them, Plaintiff was injured in her health, strength and activity, sustaining serious bodily injury and shock
25 to her nervous system, which has caused and will continue to cause Plaintiff great mental and physical
26 pain and suffering, all to her general damage in an amount to be proven at trial.

27 33. As a direct, legal and proximate result of the aforesaid acts of all Defendant, SACHA
28 BARON COHEN and DOES 1 through 100, Plaintiff was compelled to and did employ the services of

1 hospitals, physicians and surgeons, nurses, and the like, to care for and treat her, and did incur hospital,
 2 medical, professional and incidental expenses, and Plaintiff is informed and believes, and upon such
 3 information and belief alleges, that she will necessarily by reason of her injuries, incur additional like
 4 expenses for an indefinite period of time in the future, all to Plaintiff's damage in a sum to be shown
 5 according to proof.

6 34. As a direct, legal and proximate result of the aforesaid acts of all Defendant, SACHA
 7 BARON COHEN and DOES 1 through 100, Plaintiff has been prevented from engaging in her usual
 8 occupation, thereby sustaining a future loss of income, the duration and extent of which is as yet
 9 undetermined, and Plaintiff is informed and believes and upon such information and belief alleges, that
 10 she will be prevented from attending to her said usual occupation for an indefinite period of time in the
 11 future and will incur an additional future loss of income, all to Plaintiff's damage in a sum to be shown
 12 according to proof.

13 35. Plaintiff is informed and believes that the aforesaid acts directed towards the Plaintiff were
 14 carried out while Defendant SACHA BARON COHEN was malicious, belligerent and the acts were done
 15 with a conscious disregard of Plaintiff's right to be free from such tortious and criminal behavior, such as
 16 to constitute oppression, fraud or malice pursuant to California *Civil Code* Section 3294, entitling
 17 Plaintiff to punitive damages in an amount appropriate to punish and set an example of all Defendants,
 18 SACHA BARON COHEN and DOES 1 through 100.

19
 20 **SECOND CAUSE OF ACTION**

21 **(Battery as Against All Defendants by Plaintiff RICHELLE OLSON)**

22 36. Plaintiff incorporates by reference the allegations contained in paragraphs 1-35, and each
 23 and every part thereof with the same force and effect as though set out at length herein.

24 37. At the time and place aforesaid, all Defendants, SACHA BARON COHEN and DOES 1
 25 through 100, intentionally, willfully, wantonly and maliciously grabbed Plaintiff's arm in such a manner
 26 so as to cause Plaintiff to reasonably believe she was about to be touched in a harmful and offensive
 27 manner.

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1 38. At no time during the events described in the preceding paragraph, nor at any time prior
2 thereto, did Plaintiff consent to any of the Defendants, SACHA BARON COHEN, and DOES 1 through
3 100's, physical touching conduct.

4 39. All Defendants, SACHA BARON COHEN and DOES 1 through 100 did the
5 aforementioned acts with the intent to cause a harmful or offensive contact the body of Plaintiff.

6 40. As a direct, legal and proximate result of the actions By reason of the wrongful, intentional
7 and malicious acts of all Defendants SACHA BARON COHEN, and DOES 1 through 100, and each of
8 them, Plaintiff was injured in her health, strength and activity, sustaining serious bodily injury and shock
9 to her nervous system, which has caused and will continue to cause Plaintiff great mental and physical
10 pain and suffering, all to her general damage in an amount to be proven at trial.

11 41. As a direct, legal and proximate result of the aforesaid acts of all Defendants, SACHA
12 BARON COHEN, and DOES 1 through 100, Plaintiff was compelled to and did employ the services of
13 hospitals, physicians and surgeons, nurses, and the like, to care for and treat her, and did incur hospital,
14 medical, professional and incidental expenses, and Plaintiff is informed and believes, and upon such
15 information and belief alleges, that she will necessarily by reason of her injuries, incur additional like
16 expenses for an indefinite period of time in the future, all to Plaintiff's damage in a sum to be shown
17 according to proof.

18 42. As a direct, legal and proximate result of the aforesaid acts of all Defendants, SACHA
19 BARON COHEN and DOES 1 through 100, Plaintiff has been prevented from engaging in her usual
20 occupation, thereby sustaining a future loss of income, the duration and extent of which is as yet
21 undetermined, and Plaintiff is informed and believes and upon such information and belief alleges, that
22 she will be prevented from attending to her said usual occupation for an indefinite period of time in the
23 future and will incur an additional future loss of income, all to Plaintiff's damage in a sum to be shown
24 according to proof.

25 43. Plaintiff is informed and believes that the aforesaid acts directed towards the Plaintiff were
26 carried out while all Defendants, SACHA BARON COHEN, and DOES 1 through 100 were voluntarily
27 malicious, and belligerent, and the acts were done with a conscious disregard of Plaintiff's right to be free
28 from such tortious and criminal behavior, such as to constitute oppression, fraud or malice pursuant to

1 California Civil Code Section 3294, entitling Plaintiff to punitive damages in an amount appropriate to
2 punish and set an example of said all Defendants, SACHA BARON COHEN and DOES 1 through 100.

3
4 **THIRD CAUSE OF ACTION**

5 **(Negligence as Against All Defendants by Plaintiff RICHELLE OLSON)**

6 44. Plaintiff incorporates by reference the allegations contained in paragraphs 1-43, and each
7 and every part thereof with the same force and effect as though set out at length herein.

8 45. All Defendants, SACHA BARON COHEN and DOES 1 through 100, inclusive, owed a
9 duty to Plaintiff not to negligently cause her harm and injury. Despite this duty, and in breach thereof,
10 Defendants did negligently and carelessly enter into an intentional physical, verbal and emotional
11 altercation without Plaintiff's knowing consent, and therefore foreseeably should have known that said
12 conduct could cause said harm and injury.

13 46. As a proximate result of Defendants' careless and negligent conduct, Plaintiff was
14 physically and emotionally injured as set forth herein.

15 All Defendants, SACHA BARON COHEN and DOES 1 through 100, and each of them, acted in
16 conscious and reckless disregard for the safety and well being of Plaintiff, and as a proximate result of
17 said conduct, Plaintiff did suffer emotional distress, and was hurt and injured in her health, strength, and
18 activity, sustaining injury to her body and shock and injury to her nervous system and person, all of which
19 injuries have caused, and continue to cause, Plaintiff great psychological, physical, and nervous pain and
20 suffering. Plaintiff is informed and believes and thereon alleges that such injuries will result in some
21 permanent disability to her. As a result of such injuries, Plaintiff has suffered general damages in an
22 amount to be proven at trial.

23 47. As a further proximate result of the negligence and carelessness of Defendants, and each
24 of them, Plaintiff has incurred, and will continue to incur, significant medical and related expenses. The
25 full amount of said expenses is not known to Plaintiff at this time as Plaintiff's injuries and treatment are
26 ongoing, and Plaintiff will move to amend this Complaint to state such amount when the same becomes
27 known, or according to proof at trial.

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1 48. As a further proximate result of the negligence and carelessness of Defendants, and each
 2 of them, Plaintiff's earning capacity has been greatly impaired, both in the past, at present, and in the
 3 future. The exact amount of such lost earning capacity is not known to Plaintiff at this time as Plaintiff's
 4 injuries and treatment are ongoing, and Plaintiff will move to amend this Complaint to state such amount
 5 when the same becomes known to him, or according to proof at trial.

6 49. The acts of all Defendants, SACHA BARON COHEN and DOES 1 through 100,
 7 inclusive, were done with the reckless disregard for Plaintiff's safety and well being within the meaning
 8 of *Civil Code* §3294, and warrant an award of punitive damages for the sake of example, for past conduct,
 9 to prohibit future similar conduct and by way of punishing the Defendant in an amount to be proven at
 10 trial.

11 FOURTH CAUSE OF ACTION

12 (Intentional Infliction of Emotional Distress as Against all Defendants by Plaintiff RICHELLE
 13 OLSON)

14 50. Plaintiff incorporates by reference the allegations contained in paragraphs 1-49, and each
 15 and every part thereof with the same force and effect as though set out at length herein.

16 51. Plaintiff is informed and believes, and thereon alleges, that the actions of all Defendants,
 17 SACHA BARON COHEN and DOES 1 through 100, in committing one or more of the acts or omissions
 18 herein alleged, each of the Defendants' conduct was intentional and malicious and done for the purpose
 19 of causing Plaintiff to suffer humiliation, mental anguish, and physical distress.
 20

21 52. Plaintiff is further informed and believes, and thereon alleges, that such actions were done
 22 with the intent to cause serious emotional distress or with reckless disregard of the probability of causing
 23 Plaintiff serious emotional distress. Plaintiff's perception of the character "Bruno" was real because
 24 Plaintiff did not know Defendant, SACHA BARON COHEN was acting. At no time up to and including
 25 May 24, 2007 was Plaintiff made aware the identity of Defendant, SACHA BARON COHEN or the
 26 name of the character "Bruno" that he was portraying at the time of the subject incident.

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1 53. All Defendants, SACHA BARON COHEN and DOES 1 through 100, and each of them,
2 purposefully and deceitfully misled Plaintiff as to SACHA BARON COHEN's true identity and at no
3 time did Plaintiff actually see SACHA BARON COHEN not dressed or portraying the character known
4 as "Bruno".

5 54. As a direct, legal and proximate result of the actions of all Defendants, SACHA BARON
6 COHEN and DOES 1 through 100, Plaintiff suffered severe emotional distress which has caused Plaintiff
7 to sustain severe, serious and potentially permanent injuries to her person, all to her damage in a sum to
8 be shown according to proof and within the jurisdiction of the Superior Court.

9 55. As a direct, legal and proximate result of the aforesaid actions of all Defendants, SACHA
10 BARON COHEN and DOES 1 through 100, Plaintiff was compelled to and did employ the services of
11 hospitals, physicians and surgeons, nurses, and the like, to care for and treat her, and did incur hospital,
12 medical, professional and incidental expenses, and Plaintiff is informed and believes, and upon such
13 information and belief alleges, that she will necessarily by reason of her injuries, incur additional like
14 expenses for an indefinite period of time in the future, all to Plaintiff's damage in a sum to be shown
15 according to proof.

16 56. As a direct, legal and proximate result of the aforesaid tortious conduct of all Defendants,
17 SACHA BARON COHEN and DOES 1 through 100, Plaintiff has been prevented from engaging in her
18 usual occupation, thereby sustaining a future loss of income, the duration and extent of which is as yet
19 undetermined, and Plaintiff is informed and believes and upon such information and belief alleges, that
20 she will be prevented from attending to her said usual occupation for an indefinite period of time in the
21 future and will incur an additional future loss of income, all to Plaintiff's damage in a sum to be shown
22 according to proof.

23 57. Plaintiff is informed and believes that the aforesaid acts directed towards the Plaintiff were
24 carried out with a conscious disregard of Plaintiff's right to be free from such tortious and criminal
25 behavior, such as to constitute oppression, fraud or malice pursuant to California Civil Code Section
26 3294, entitling Plaintiff to punitive damages in an amount appropriate to punish and set an example of all
27 Defendants, SACHA BARON COHEN and DOES 1 through 100.

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FIFTH CAUSE OF ACTION**(Negligent Infliction of Emotional Distress as Against all Defendants by Plaintiffs RICHELLE OLSON and LANCE OLSON)**

58. Plaintiffs incorporate by reference the allegations contained in paragraphs 1-57, and each and every part thereof with the same force and effect as though set out at length herein.

59. Plaintiffs are further informed and believe, and thereon allege, that such actions were done with the intent to cause serious emotional distress or with reckless disregard of the probability of causing Plaintiff RICHELLE OLSON serious emotional distress. Plaintiff RICHELLE OLSON's perception of the character "Bruno" was real because Plaintiff did not know Defendant, SACHA BARON COHEN was acting. At no time up to and including May 24, 2007 was Plaintiff RICHELLE OLSON made aware the identity of Defendant, SACHA BARON COHEN or the name of the character "Bruno" that he was portraying at the time of the subject incident.

60. Defendants, SACHA BARON COHEN and DOES 1 through 100 purposefully and deceitfully misled Plaintiff RICHELLE OLSON as to his true identity and at no time did Plaintiff RICHELLE OLSON actually see SACHA BARON COHEN not dressed or portraying the character known as "Bruno".

61. All Defendants, SACHA BARON COHEN and DOES 1 through 100, inclusive, owed a duty to Plaintiff RICHELLE OLSON not to negligently cause her harm and injury. Despite this duty, and in breach thereof, Defendants did negligently and carelessly touch Plaintiff RICHELLE OLSON without consent, and therefore should have foreseeably known that said conduct would cause said harm and injury.

62. Plaintiffs are informed and believes, and thereon allege, that the actions of all Defendants, SACHA BARON COHEN and DOES 1 through 100, in committing one or more of the acts or omissions herein alleged, each of the Defendants' conduct was intentional and malicious and done for the purpose of causing Plaintiff RICHELLE OLSON to suffer humiliation, mental anguish, and physical distress.

63. Plaintiffs are further informed and believe, and thereon allege, that such actions were done with the intent to cause serious emotional distress or with reckless disregard of the probability of causing Plaintiff RICHELLE OLSON serious emotional distress.

SIXTH CAUSE OF ACTION

(Conspiracy to Defraud as Against all Defendants by Plaintiff RICHELLE OLSON)

68. Plaintiff incorporates by reference the allegations contained in paragraphs 1-67, and each and every part thereof with the same force and effect as though set out at length herein.

69. Each of the Defendants, SACHA BARON COHEN and DOES 1 through 100, knowingly and willingly conspired and agreed among them to damage Plaintiff by entering into written and verbal agreements whereby Plaintiff would knowingly rely upon representations made by Defendants in deciding and determining whether to enter into the agreement.

70. The written agreements in the form of contracts were presented to Plaintiff under duress, without the counsel of an attorney or the ability to actually read the contract. The acts of All Defendants, SACHA BARON COHEN and DOES 1 through 100, and each of them knew that by forcing the contract on Plaintiff at time of the incident, Plaintiff could not reasonably know what she was signing or the rights she was conveying to Defendants.

71. All Defendants, SACHA BARON COHEN and DOES 1 through 100, and each of them, made representations of material fact as follows: Defendants stated to Plaintiff that a well-known host/celebrity wanted to visit Plaintiff's charity bingo game to be included in the filming of a documentary on bingo that would be airing on a television station such as Discovery Channel or PBS.

72. These representations were in fact false. The truth was Defendant SACHA BARON COHEN would be appearing as a fictional character known as "Bruno" in the course of filming a movie called *Bruno*. Defendants knew they were false and intentionally and purposefully misled Plaintiff.

73. Defendants made the representations with the intent to defraud and induce plaintiff to act as described herein. At the time Plaintiff acted, Plaintiff did not know the representations were false and believed they were true. At no time did Defendants inform Plaintiff that Defendant, SACHA BARON COHEN would be the host/celebrity visiting the charity, nor was Plaintiff informed at any time that Defendant, SACHA BARON COHEN would be appearing as a fictional character known as "Bruno". Plaintiff's perception of the character "Bruno" was real because Plaintiff did not know Defendant, SACHA BARON COHEN was acting. Plaintiff acted in justifiable reliance upon the truth of the representations.

1 64. As a direct, legal and proximate result of the actions of all Defendants, SACHA BARON
 2 COHEN and DOES 1 through 100, Plaintiff RICHELLE OLSON suffered severe emotional distress
 3 which has caused Plaintiff RICHELLE OLSON to sustain severe, serious and potentially permanent
 4 injuries to her person, all to her damage in a sum to be shown according to proof and within the
 5 jurisdiction of the Superior Court.

6 65. As a direct, legal and proximate result of the aforesaid actions of all Defendants, SACHA
 7 BARON COHEN and DOES 1 through 100, Plaintiff RICHELLE OLSON was compelled to and did
 8 employ the services of hospitals, physicians and surgeons, nurses, and the like, to care for and treat her,
 9 and did incur hospital, medical, professional and incidental expenses, and Plaintiff is informed and
 10 believes, and upon such information and belief alleges, that she will necessarily by reason of her injuries,
 11 incur additional like expenses for an indefinite period of time in the future, all to Plaintiffs' damage in a
 12 sum to be shown according to proof.

13 66. As a direct, legal and proximate result of the aforesaid tortious conduct of all Defendants,
 14 SACHA BARON COHEN and DOES 1 through 100, Plaintiff RICHELLE OLSON has been prevented
 15 from engaging in her usual occupation, thereby sustaining a future loss of income, the duration and extent
 16 of which is as yet undetermined, and Plaintiff is informed and believes and upon such information and
 17 belief alleges, that she will be prevented from attending to her said usual occupation for an indefinite
 18 period of time in the future and will incur an additional future loss of income, all to Plaintiffs' damage in
 19 a sum to be shown according to proof.

20 67. Plaintiffs are informed and believe that the aforesaid acts directed towards Plaintiff
 21 RICHELLE OLSON were carried out with a conscious disregard of Plaintiff's right to be free from such
 22 tortious and criminal behavior, such as to constitute oppression, fraud or malice pursuant to California
 23 Civil Code Section 3294, entitling Plaintiff RICHELLE OLSON to punitive damages in an amount
 24 appropriate to punish and set an example of all Defendants, SACHA BARON COHEN and DOES 1
 25 through 100.

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1 74. All Defendants, SACHA BARON COHEN and DOES 1 through 100, and each of them,
2 knew or reasonably should have known that he, she, or it could not truthfully and/or accurately make any
3 of these representations,

4 75. At the time or times that one or more of these representations was made by all Defendants,
5 SACHA BARON COHEN and DOES 1 through 100, and each of them, and throughout the time Plaintiff
6 acted or refrained from acting in reliance thereon, the lack of accurate information, and of the inability to
7 make these representations accurately, were concealed from Plaintiff by each of the Defendants.

8 76. As a proximate result of the conduct of all Defendants, SACHA BARON COHEN and
9 DOES 1 through 100, and each of them, Plaintiff has sustained monetary damage, the precise amount of
10 which is unknown at this time and Plaintiff will seek leave of Court to amend this Complaint to include
11 the precise amount of such losses when they have been ascertained.

12 77. As a further proximate result of the acts and omissions of all Defendants, SACHA
13 BARON COHEN and DOES 1 through 100, and each of them, Plaintiff has suffered and continues to
14 suffer humiliation, mental anguish, and emotional and physical distress.

15 78. The acts and conduct of all Defendants, SACHA BARON COHEN and DOES 1 through
16 100, and each of them, were carried out in a deliberate, calculating, willful, intentional, and malicious
17 manner, and with the specific intent to injure and oppress Plaintiff and Plaintiff businesses. By reason of
18 this despicable and contemptible conduct, Plaintiff is entitled to exemplary and/or punitive damages.
19

20 **SEVENTH CAUSE OF ACTION**

21 **(Unfair Competition in Violation of Cal. Bus. & Prof. Code §17200 et. seq. as Against all**
22 **Defendants by Plaintiff RICHELLE OLSON)**

23 Plaintiff incorporates by reference the allegations contained in paragraphs 1-78, and each and every part
24 thereof with the same force and effect as though set out at length herein.

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1 79. Plaintiff is informed and believes and on that basis thereon alleges, all Defendants,
2 SACHA BARON COHEN and DOES 1 through 100's use of the Confidential Information obtained
3 improperly from Plaintiff and without her consent as described herein constitutes an unlawful, unfair,
4 and/or fraudulent business act in violation of Section 17200 et seq. of the California Business and
5 Professions Code and California common law.

6 80. As a direct and proximate result of defendants' wrongful acts, Plaintiff has suffered and
7 will continue to suffer substantial pecuniary losses and irreparable injury to its business reputation and
8 goodwill. As such, a remedy at law is not adequate to compensate for injuries inflicted by Defendants.
9 Accordingly, Plaintiff is entitled to temporary, preliminary and permanent injunctive relief as against the
10 pending release of the film currently titled, "Bruno" and all its edits, cuts, any footage, used or not used in
11 the film "Bruno".

12 81. By reason of such wrongful acts, Plaintiff is and was, and will be in the future, deprived of
13 the profits and benefits of said business relationships, agreements, and transactions with various existing
14 employees, clients, prospective clients, and/or suppliers, and defendants have wrongfully obtained such
15 profits and benefits in an amount to conform to proof at trial, but in no event less than the jurisdictional
16 minimum of this Court.

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18 **EIGHTH CAUSE OF ACTION**

19 **(Intentional Concealment as against all Defendants by Plaintiff RICHELLE OLSON)**

20 82. Plaintiff incorporates by reference the allegations contained in paragraphs 1-81, and each
21 and every part thereof with the same force and effect as though set out at length herein.

22 All Defendants, SACHA BARON COHEN and DOES 1 through 100, made representations of material
23 fact as follows: Defendants and each of them stated to Plaintiff that a well-known host/celebrity wanted
24 to visit Plaintiff's charity bingo game to be included in the filming of a documentary on bingo that would
25 be airing on a television station such as Discovery Channel or PBS.

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1 83. These representations were in fact false. The truth was as follows: Defendant SACHA
2 BARON COHEN would be appearing as a fictional character known as "Bruno" in the course of filming
3 a movie called *Bruno*. Defendant knew they were false and intentionally concealed Defendants' identity
4 to mislead Plaintiff.

5 84. Defendant made the representations with the intent to defraud and induce Plaintiff to act as
6 described herein. At the time Plaintiff acted, Plaintiff did not know the representations were false and
7 believed they were true. At no time did Defendants inform Plaintiff that Defendant, SACHA BARON
8 COHEN would be the host/celebrity visiting the charity, nor was Plaintiff informed at any time that
9 Defendant, SACHA BARON COHEN would be appearing as a fictional character known as "Bruno".
10 Plaintiff's perception of the character "Bruno" was real because Plaintiff did not know Defendant,
11 SACHA BARON COHEN was acting. Plaintiff acted in justifiable reliance upon the truth of the
12 representations.

13 85. As a proximate and legal result of the representations as alleged, Plaintiff has been
14 damaged as alleged.

15 86. In doing the aforementioned acts, all Defendants, SACHA BARON COHEN and DOES 1
16 through 100, and each of them, gained an advantage over Plaintiff in matters relating to Plaintiff's
17 comfort, safety, and health.

18 87. By reason of the foregoing, all Defendants, SACHA BARON COHEN and DOES 1
19 through 100, and each of them, have acted with malice, fraud and oppression, and an award of punitive
20 damages in a sum according to proof at trial is justified, warranted and appropriate.

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22 **NINTH CAUSE OF ACTION**

23 **(False Promise as against all Defendants by Plaintiff RICHELLE OLSON)**

24 88. Plaintiff incorporates by reference the allegations contained in paragraphs 1-87, and each
25 and every part thereof with the same force and effect as though set out at length herein.

26 89. Plaintiff is informed and believes and on that basis thereon alleges, all Defendants,
27 SACHA BARON COHEN and DOES 1 through 100's use of the Confidential Information obtained
28 improperly from Plaintiff, and without its consent, to compete against Plaintiff as described herein

1 constitutes unlawful, unfair, and/or fraudulent business acts in violation of Section 17200 et seq. of the
2 California Business and Professions Code and California common law.

3 90. By reason of such wrongful acts, Plaintiff is and was, and will be in the future, deprived of
4 the profits and benefits of said business relationships, agreements, and transactions with various existing
5 employees, clients, prospective clients, and/or suppliers, and all Defendants, SACHA BARON COHEN
6 and DOES 1 through 100, and each of them have wrongfully obtained such profits and benefits in an
7 amount to conform to proof at trial, but in no event less than the jurisdictional minimum of this Court.
8

9 **TENTH CAUSE OF ACTION**

10 **(Fraudulent Misrepresentation as Against all Defendants by Plaintiff, RICHELLE OLSON)**

11 91. Plaintiff incorporates by reference the allegations contained in paragraphs 1-90, and each
12 and every part thereof with the same force and effect as though set out at length herein.

13 92. Defendant made representations of material fact as follows: Defendants and each of them
14 stated to Plaintiff that a well-known host/celebrity wanted to visit Plaintiff's charity bingo game to be
15 included in the filming of a documentary on bingo that would be airing on a television station such as
16 Discovery Channel or PBS.

17 93. These representations were in fact false. The truth was as follows: Defendant SACHA
18 BARON COHEN would be appearing as a fictional character known as "Bruno" in the course of filming
19 a movie called *Bruno*. Defendant knew they were false.

20 94. All Defendants, SACHA BARON COHEN and DOES 1 through 100, and each of them
21 made the representations with the intent to defraud and induce Plaintiff to act as described herein. At the
22 time Plaintiff acted, Plaintiff did not know the representations were false and believed they were true. At
23 no time did Defendants inform Plaintiff that Defendant, SACHA BARON COHEN would be the
24 host/celebrity visiting the charity, nor was Plaintiff informed at any time that Defendant, SACHA
25 BARON COHEN would be appearing as a fictional character known as "Bruno". Plaintiff's perception of
26 the character "Bruno" was real because Plaintiff did not know Defendant, SACHA BARON COHEN was
27 acting. Plaintiff acted in justifiable reliance upon the truth of the representations.

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1 95. As a proximate and legal result of the representations as alleged, Plaintiffs has been
2 damaged as alleged.

3 96. In doing the aforementioned acts, all Defendants, SACHA BARON COHEN and DOES 1
4 through 100, and each of them gained an advantage over Plaintiff in matters relating to Plaintiff's
5 comfort, safety, and health.

6 97. By reason of the foregoing, all Defendants, SACHA BARON COHEN and DOES 1
7 through 100, and each of them, have acted with malice, fraud and oppression, and an award of punitive
8 damages in a sum according to proof at trial is justified, warranted and appropriate.

9
10 **ELEVENTH CAUSE OF ACTION**

11 **(Loss of Consortium as Against all Defendants by Plaintiff LANCE OLSON)**

12 98. Plaintiff incorporates by reference the allegations contained in paragraphs 1-97, and each
13 and every part thereof with the same force and effect as though set out at length herein.

14 99. Prior to the injuries as alleged above, Plaintiff RICHELLE OLSON's spouse, LANCE
15 OLSON was able to and did perform said duties as a spouse. Subsequent to the injuries and as a
16 proximate result thereof, Plaintiff LANCE OLSON's spouse, Plaintiff RICHELLE OLSON has been
17 unable to perform the necessary duties as a spouse in the work and services usually performed in the care,
18 maintenance and management of the family home; and Plaintiff LANCE OLSON's spouse RICHELLE
19 OLSON will be unable to perform such work, services, and duties in the future. By reason thereof,
20 Plaintiff LANCE OLSON has been deprived and will be deprived of the consortium of his spouse
21 including the performance of the spouse's necessary duties all to Plaintiff LANCE OLSON's damages in
22 an amount in excess of the jurisdictional limits of this court in an amount to be specified in accordance
23 with the provisions of CCP Sections 425.10 and 425.11.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against each of the Defendants as follows:

1. On the Third, Ninth, Tenth, and Eleventh Causes of Action:

(a) For actual and/or compensatory damages in favor of Plaintiffs and against each of the Defendants in an amount to be ascertained at the time of trial; and,

(b) For all medical and incidental expenses according to proof;

(c) For all future loss of earnings according to proof;

(d) For interest on any actual or compensatory damages Plaintiff may obtain.

2. On the First, Second, Fourth, Fifth, Sixth, Seventh and Eighth Causes of Action:

(a) For actual and/or compensatory damages in favor of Plaintiffs and against each of the Defendants in an amount to be ascertained at the time of trial;

(b) For punitive and/or exemplary damages in favor of Plaintiffs and against each of the Defendants;

(c) For all medical and incidental expenses according to proof;

(d) For all future loss of earnings according to proof;

(e) For interest on any actual or compensatory damages Plaintiffs may obtain; and,

(f) For interest on any punitive and/or exemplary damages Plaintiffs may obtain.

3. On All Causes of Action:

(a) For Plaintiffs' cost of suit, including their attorneys' fees; and,

(b) For such other and further relief as this Court may deem just and proper.

Dated: May 22, 2009.

By: _____

KYLE K. MADISON
WALTER B. BATT
Attorneys for Plaintiff
RICHELLE OLSON