

1 **LAW OFFICES OF JOHNNY L. GRIFFIN III**  
2 **JOHNNY L. GRIFFIN, III** (SBN 118694)  
3 **MANOLO H. OLASO** (SBN 195629)  
4 1010 F Street, Suite 200  
5 Sacramento, California 95814  
6 Telephone: (916) 444-5557  
7 Fax: (916) 444-5558  
8 Attorneys for Plaintiff C. DOE

FILED  
Superior Court Of California  
Sacramento  
12/22/2011  
mpw:ell  
By \_\_\_\_\_, Deputy  
Case Number:  
34-2011-00116090

9 **SUPERIOR COURT OF CALIFORNIA**

10 **COUNTY OF SACRAMENTO**

Department  
Assignments

Case Management 35  
Law and Motion 54  
Minors Compromise 17

11 C. DOE, an individual,  
12 Plaintiff,

13 vs.

14 MICHAEL P. LYON, and DOES 1  
15 THROUGH 50, inclusive,  
16 Defendants.

Case No.:

**COMPLAINT FOR INVASION OF  
PRIVACY**

1. Eavesdropping (Penal Code §632)
2. Intrusion (Invasion of Privacy;  
Common Law)
3. Constructive Invasion of Privacy  
(Civil Code §1708.8 (b) and (f))
4. Public Disclosure of Private Facts  
(Invasion of Privacy; Common Law)
5. Unlawful Possession of Recording  
Device (Penal Code §§ 635 (a) and  
637.2 (a))
6. Intentional Infliction of Emotional  
Distress
7. Negligence

**DEMAND FOR JURY TRIAL**

17 The Plaintiff complains and alleges as follows:

18 **I. JURISDICTION/VENUE**

- 19
- 20 1. This Complaint seeks, inter alia, damages in excess of \$50,000.00 and is based upon events,  
21 acts, and/or omissions that occurred in the County of Sacramento. Jurisdiction and venue is  
22 thus proper in the Superior Court of California for the County of Sacramento.  
23  
24  
25

Law Offices of Johnny L. Griffin III  
1010 F Street, Suite 200, Sacramento, CA 95814  
(916) 444-5557  
www.johnnygriffinlaw.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**II. PARTIES**

2. Plaintiff C. DOE is a natural person.
3. Defendant MICHAEL P. LYON is a natural person.
4. The true names and identities of defendants DOES 1 through 50 are presently unknown to Plaintiff. Plaintiff hereby uses the fictitious name DOE to designate these defendants. Plaintiff alleges that the DOE defendants, and each of them, is legally responsible for the incident, injuries and damages set forth here, and that each of said DOE defendants proximately caused said incident, injuries and damages by reason of their negligence, breach of duty, negligent supervision, management or control or by reason of other personal, vicarious or imputed negligence, fault, or breach of duty, whether based upon agency, employment, or control, whether severally or jointly, or upon any other act or omission. Plaintiff will seek to amend this complaint as soon as the true names and identities of the DOE defendants have been ascertained.
5. Each of the defendants, including DOES 1 through 50, caused, and is legally responsible for, the incident, unlawful conduct, injuries and damages alleged herein by personally participating in the unlawful conduct, or acting jointly or conspiring with others to act, by authorizing or allowing, explicitly or implicitly, acts or omissions that led to the unlawful conduct, by failing to take action to prevent the unlawful conduct, and by ratifying the unlawful conduct that occurred.
6. Plaintiff is informed and believes and thereon alleges that at all times mentioned in this complaint, defendants, and each of them, were the agents, employees, servants, joint ventures, partners and/or co-conspirators of the other defendants named in this complaint

Law Offices of Johnny L. Griffin III  
1010 F Street, Suite 200, Sacramento, CA 95814  
(916) 444-5557  
www.johnnygriffinlaw.com

1 and that at all times, each of the defendants were acting within the course and scope of said  
2 relationship with other defendants.

3 **III. FACTUAL ALLEGATIONS**

- 4 7. Plaintiff C. DOE (hereinafter "Plaintiff") is a 37 year-old female.
- 5 8. On or about October 8, 2008, Defendant MICHAEL P. LYON (hereinafter "Defendant")  
6 contacted Plaintiff and asked her to come to his home at 2000 Fox Hollow Lane to engage in  
7 a sexual encounter. Plaintiff accepted Defendant's invitation and arrived at Defendant's  
8 home located in the County of Sacramento.
- 9 9. Defendant had knowingly and intentionally placed hidden and/or disguised devices that  
10 could record video and audio in the room(s) of the home in which Plaintiff had arrived.  
11 Defendant placed the recording devices in the home for the purpose of capturing and  
12 recording private sexual behaviors of invited guests. Defendant had, on previous occasions,  
13 knowingly and intentionally captured video and audio of persons engaging in private  
14 behavior, some of it sexual behavior.
- 15 10. Plaintiff did not see or know that recording devices had been placed in the home. Defendant  
16 did not advise Plaintiff that recording devices were in the home and were operating during  
17 the time Plaintiff was present. Defendant did not ask for Plaintiff's consent to record video  
18 or audio of her at any time.
- 19 11. Defendant and Plaintiff engaged in sexual intercourse and a variety of sexual acts.  
20 Defendant. The sexual encounter between Defendant and Plaintiff was captured and  
21 recorded, both in video images and in audio recordings. Defendant either intentionally and  
22 knowingly turned on the recording devices to capture recordings of Plaintiff engaged in  
23 private sexual behavior or failed to act to make sure the devices were not operating to record  
24  
25