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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

SEP 19 2012

John A. Clarke, Executive Officer/Clerk
BY M. Flores Deputy
Mary Flores

Debra Katz Weintraub

D-47

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14 Attorneys for Plaintiff
15 Cindy Lee Garcia

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
17 **FOR THE COUNTY OF LOS ANGELES**

18 CINDY LEE GARCIA, an individual,
19
20 Plaintiffs,

21 vs.

22 NAKOULA BASSELEY NAKOULA,
23 an individual also known as SAM
24 BACILE; GOOGLE, INC., a Delaware
25 Corporation; YOUTUBE, a California
26 limited liability company, and DOES 1
27 through 200, inclusive.

28 Defendants.

Case No. **BC 49 2358**

COMPLAINT FOR:

1. **Declaratory Relief**
2. **Invasion of Privacy**
3. **False Light Invasion of Privacy**
4. **Right of Publicity;**
5. **Fraud;**
6. **Unfair Business Practices**
7. **Slander;**
8. **Intentional Infliction of Emotional Distress**

[Demand For Jury Trial]

**[Ex Parte Application for a
Temporary Restraining Order and a
Preliminary Injunction Requested]**

CIV/CASE: KC492358 LEA/JEF#:
 RECEIPT #: CCR478057009
 DATE PAID: 09/19/12 08:54:16 AM
 PAYMENT: \$435.00 0310
 RECEIVED:
 CHECK: 435.00
 CASH:
 CHANGE:
 CARD:

ORIGINAL

1 For her verified Complaint against Defendants Nakoula Basseley Nakoula, also known as
2 Sam Bacile, Google, Inc. and YouTube LLC, Plaintiff Cindy Lee Garcia alleges as follows:

3 **GENERAL ALLEGATIONS**

4 **A. The Parties**

5 1. Plaintiff Cindy Lee Garcia is an individual and at all relevant times herein was a
6 resident of Kern County, California.

7 2. Defendant Nakoula Basseley Nakoula, also known as Sam Bacile (“Defendant
8 Nakoula” or “Bacile”) is an individual and at all relevant times herein as a resident of Los Angeles
9 County, California.

10 3. Defendant Google, Inc., is a corporation incorporated in Delaware with its principal
11 place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043. Google
12 conducts business throughout California, the nation, and the world.

13 4. Defendant YouTube, LLC, is a California limited liability company. YouTube
14 conducts business throughout California, the nation, and the world.

15 5. Plaintiff lacks knowledge of the true names and capacities of the defendants sued
16 herein as DOES 1 through 200, inclusive, and therefore sues these defendants by such fictitious
17 names. DOES 1-150 are unidentified posters of the film, as further described below. Plaintiff will
18 amend this complaint to allege their true names and capacities when they have been ascertained.

19 6. Plaintiff is informed and believes that each of the defendants designated herein as a
20 Doe is responsible in some manner for the events and happenings herein alleged, as well as for the
21 damages alleged.

22 7. Plaintiff is informed and believes that each of the defendants was the agent or
23 employee of each of the remaining defendants and, at all relevant times herein, acted within the
24 course and scope of such agency and/or employment.

25 **FACTUAL BACKGROUND**

26 8. Plaintiff Garcia is an actress. Garcia works in film, television and theatre.

27 9. In July of 2011, Plaintiff Garcia responded to a casting call posted on Backstage for
28 a film titled “Desert Warrior,” which was represented to be an “historical Arabian Desert

1 adventure film.” She was cast in the film. The producers of the film, including DOES 151-200,
2 and Defendant Bacile, intentionally concealed the purpose and content of the film.

3 10. Ms. Garcia was given pages of the script “Desert Warrior.” There was no mention
4 of “Mohammed” during filming or on the set. There were no references made to religion nor was
5 there any sexual content of which Ms. Garcia was aware. Mr. Bacile represented to her that the
6 Film was indeed an adventure film and about ancient Egyptians. Based on those specific
7 representations made and the script and the manner in which the Film was shot, she agreed to
8 deliver an acting performance for “Desert Warriors.”

9 11. On July 2, 2012, Defendant Bacile published a video entitled “The Innocence of
10 Muslims” (the “Film”) to the Internet site www.youtube.com, making the Film available publicly
11 and globally. The Film includes Plaintiff’s acting work from “Desert Warriors” and has been
12 changed grotesquely to make it appear that Ms. Garcia voluntarily performed in a hateful anti-
13 Islamic production. The Film is vile and reprehensible. Plaintiff was unaware of the vile content
14 contained in the Film, as the content and overall purpose of the Film was concealed from them at
15 all times by Defendant Bacile and DOES 151 through 200. This lawsuit is not an attack on the
16 First Amendment nor on the right for Americans to say what they think, but does request that the
17 offending content be removed from the Internet.

18 12. Based on information and belief, in around September of 2012, Defendant Bacile
19 published the Film, with the voices of Plaintiffs and her castmates dubbed into Arabic, on
20 YouTube. The availability of the Film in Arabic has set off protests and violence in the Middle
21 East. That violence resulted in the assassination of four embassy officials in Libya, including
22 United States Ambassador Christopher Stevens.

23 13. After the Film was published on YouTube, Plaintiff received death threats.

24 14. After the Film was published on YouTube, Plaintiff’s family, fearing for their own
25 safety, informed her that she was no longer permitted to see her grandchildren, whom she
26 previously babysat regularly.

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1 **SECOND CAUSE OF ACTION**

2 **Invasion of Privacy**

3 **Against All Defendants**

4 21. Plaintiff repeats and realleges paragraphs 1 through 20 of this Complaint as though
5 set forth in full.

6 22. The right of privacy is protected by the California Constitution, Article I, Section 1.

7 23. At all times herein mentioned and up to and including the present, Plaintiff had a
8 legally protected interest in her privacy and the right to be free from having hateful words put in
9 her mouth or being depicted as a bigot. The right to privacy is a fundamental right, long respected
10 in the California courts.

11 24. At all times herein mentioned and up to and including the present, Plaintiff had a
12 reasonable expectation of privacy, and at no time expected that Defendants would use her image
13 as a virtual "puppet" for Defendant Bacile's bigoted views (which Plaintiff does not share and
14 rejects), or that Defendant YouTube and its parent company, Google, would refuse to remove the
15 Film after it was alerted of the wrongdoing.

16 25. On or about September of 2011, Plaintiff became aware for the first time that
17 another voice had been dubbed over her image, making it appear that she had made outrageously
18 bigoted statements that she never said and does not endorse.

19 26. The conduct of Defendants, and each of them, in disseminating this false depiction
20 of Plaintiff as described herein constituted a serious invasion of Plaintiff's right to privacy, and
21 was an egregious breach of social norms that subjected Plaintiff to death threats and extreme
22 emotional distress.

23 27. As a proximate cause of the conduct of Defendants, and each of them, Plaintiff has
24 suffered emotional distress, mental suffering, and invasion of her Constitutional right to privacy in
25 a sum that is presently unascertainable. Plaintiff will seek leave of court to amend this Complaint
26 to set forth the full amount of said damage when ascertained.

27 28. The acts of Defendants, and each of them, were willful, wanton, malicious, and
28 oppressive, and justify an award of exemplary and punitive damages.

1 have been seen and heard by millions of individuals throughout the world, whose names are not
2 presently known to Plaintiff.

3 69. These words were slanderous because they tend to injure Plaintiff in her profession,
4 trade and business by imputing to her a general disqualification for working with the public,
5 something that the occupation and duties of her profession peculiarly require, and the profitability
6 of which is naturally lessened if she is believed to be a religious bigot.

7 70. These words published by Defendants were stated not as a matter of opinion, but as
8 a matter of fact, and therefore were not protected or privileged in any way.

9 71. The words published by Defendants also were slanderous because Plaintiff never
10 called the founder of Islam a child molester, either on the set of the Film or at any other place or
11 time.

12 72. At no relevant time did Plaintiff ratify or consent to the dissemination of the
13 statements, on YouTube or anywhere else. In fact, Plaintiff subsequently contacted Defendant
14 Bacile to ask him to remove the Film from YouTube and also contacted Google and YouTube to
15 request the same thing.

16 73. Plaintiff is informed and believes and thereon alleges that Defendants repeated the
17 false statements to others, including a worldwide audience on YouTube.

18 74. The words that Defendants put, and kept, in Plaintiff's mouth carried a defamatory
19 meaning by their very terms and were understood by those who saw and heard them in a way that
20 defamed Plaintiff.

21 75. Defendants further published such statements deliberately and with knowledge and
22 intention that such words would be heard by a worldwide YouTube.com audience.

23 76. As a proximate result of Defendants' publication of the false statements, Plaintiff
24 has suffered loss of her reputation, shame, mortification, and hurt feelings all to her general
25 damages in a sum to be proven at trial.

26 77. As a further result of Defendants' publication of the false statements, Plaintiff has
27 suffered special damages according to proof.

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REQUEST FOR JURY TRIAL

Plaintiff hereby requests a trial for jury.

Dated: September 18, 2012

THE ARMENTA LAW FIRM, A.P.C.

By: 

M. Cris Armenta
Attorneys for Plaintiff
Cindy Lee Garcia

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VERIFICATION

I, Cindy Lee Garcia, a Plaintiff in this proceeding, have read the documents:

COMPLAINT FOR:

**Declaratory Relief
Invasion of Privacy
False Light Invasion of Privacy
Right of Publicity;
Fraud;
Unfair Business Practices
Slander;
Intentional Infliction of Emotional Distress**

[Demand For Jury Trial]

[Ex Parte Application for a Temporary Restraining Order and a Preliminary Injunction Requested]

The information contained therein are true of my own knowledge, except as to those matters that are alleged on information and belief, and, as to those matters, I believe it to be true. I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of September, 2012 in Los Angeles, California.

See attached faxed signature

Cindy Lee Garcia

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VERIFICATION

I, Cindy Lee Garcia, a Plaintiff in this proceeding, have read the documents:

COMPLAINT FOR:

**Declaratory Relief
Invasion of Privacy
False Light Invasion of Privacy
Right of Publicity;
Fraud;
Unfair Business Practices
Slander;
Intentional Infliction of Emotional Distress**

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Cindy Lee Garcia

Cindy Lee Garcia

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
The Armenta Law Firm, A PROFESSIONAL CORPORATION
M. Cris Armenta, SBN:177403
11900 Olympic Boulevard, Suite 730 - Los Angeles, CA 90064
TELEPHONE NO.: 310-826-2826 x108 FAX NO.: 310-826-5456
ATTORNEY FOR (Name): Cindy Lee Garcia, Plaintiff

FILED
FOR COURT REPORTER
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

SEP 19 2012

John A. Clarke, Executive Officer/Clerk
BY Mary Flores Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles
STREET ADDRESS: 111 North Hill Street
MAILING ADDRESS: Same
CITY AND ZIP CODE: Los Angeles, CA 90012
BRANCH NAME: Central

CASE NAME:
Cindy Lee Garcia vs. Nakoula Basseley Nakoula, et al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000)
 Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:
BC 49 2358
JUDGE:
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23)	Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20)
Non-PI/PD/WD (Other) Tort <input checked="" type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35)	Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): 6
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: September 18, 2012
M. Cris Armenta

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

ORIGINAL

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other P/DPD/W (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other P/DPD/W (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/DPD/W (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other P/DPD/W

Non-P/DPD/W (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-P/DPD/W Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor
Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

SHORT TITLE: Cindy Lee Lewis vs. Nakoula Basseley Nakoula, et al.	CASE NUMBER BC 49 2358
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**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL ³ HOURS/ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked “Limited Case”, skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

Step 3: In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office. |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 3. 1., 2., 4.	
Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input checked="" type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

ORIGINAL

Non-Personal Injury/Property Damage/
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Judicial Review Unlawful Detainer

SHORT TITLE: Cindy Lee Lewis vs. Nakoula Basseley Nakoula, et al.	CASE NUMBER
--	-------------

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

SHORT TITLE: Cindy Lee Lewis vs. Nakoula Basseley Nakoula, et al.	CASE NUMBER
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Judicial Review (Cont'd.)

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.

Provisionally Complex
Litigation

Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.

Enforcement
of Judgment

Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
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Miscellaneous Civil
Complaints

RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.

Miscellaneous Civil Petitions

Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

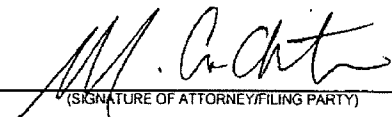
SHORT TITLE: Cindy Lee Lewis vs. Nakoula Basseley Nakoula, et al.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 12608 Park Street
CITY: Cerritos	STATE: CA	ZIP CODE: 90703	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subs. (b), (c) and (d)).

Dated: September 18, 2012


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.