

Kevin M. McGuire (California Bar No. 164895; themcguirelawfirm@yahoo.com)

The McGuire Law Firm
43460 Ridge Park Drive, Suite 200
Temecula, California 92590
Tel: (951) 719-8416
Fax: (949) 258-5807

Herman Law
(Pending application for *pro hac vice* admission)

3351 NW Boca Raton Boulevard
Boca Raton, Florida 33431

Jeff Herman (Florida Bar No. 521647; jherman@hermanlaw.com)

Stuart S. Mermelstein (Florida Bar No. 947245; smermelstein@hermanlaw.com)

Lee G. Cohen (Florida Bar No. 825670; lcohen@hermanlaw.com)

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

John Doe No. 117,

Plaintiff,

vs.

BRYAN SINGER and
GARY GODDARD,

Defendants.

Case No.:

COMPLAINT ALLEGING DAMAGES FOR:

- 1. Violation of Alien Tort Claims Act, 28 U.S.C. U.S.C. §1350
- 2. Violations of 18 U.S.C. §§2251, 2423
- 3. Violation of California Penal Code § 288.4
- 4. Violation of California Civil Code §52.4

DEMAND FOR JURY TRIAL

Plaintiff, JOHN DOE No. 117, hereby sues Defendants BRYAN SINGER and GARY

GODDARD, and states the following:

INTRODUCTION

Upon information and belief, Defendants BRYAN SINGER and GARY GODDARD sexually assaulted the child John Doe No. 117 in the United Kingdom. BRYAN SINGER and GARY GODDARD were motivated by their prurient interests and desire to recruit the child into

1 sexual liaisons, using their prominence, positions and associations within the entertainment and
2 film industry, and their knowledge of the child's career aspirations, as their devices to gain the
3 trust of Plaintiff. They betrayed that trust, committing sexual assaults on Plaintiff.

4
5 **JURISDICTION VENUE AND PARTIES**

6 1. Plaintiff, John Doe, is a citizen and resident of the United Kingdom. Plaintiff is
7 identified in this lawsuit by the pseudonym JOHN DOE NO. 117 ("John" or "John Doe") in that
8 this case involves facts of the utmost intimacy regarding Plaintiff's childhood sexual abuse, and
9 Plaintiff fears further psychological injury if his name were publicly disclosed.¹

11 2. Defendant, BRYAN SINGER, is a citizen and resident of the State of California
12 and is *sui juris*.

13 3. Defendant, GARY GODDARD, is a citizen and resident of the State of California
14 and is *sui juris*.

15 4. This Court has federal question subject matter jurisdiction of this action pursuant
16 to 28 U.S.C. §1331, and supplemental jurisdiction over the state law claims pursuant to 28
17 U.S.C. §1367.

18 5. Alternatively, this Court also has diversity jurisdiction over this action pursuant to
19 28 U.S.C. §1332(a)(1). The amount in controversy exceeds \$75,000.00, and this action is
20 between citizens of the United States and a citizen of a foreign country.

21 6. A substantial part of the acts, communications, events, or omissions giving rise to
22 Plaintiff's claims arose in and around Los Angeles County, California and the Defendants reside
23
24
25
26
27

28 ¹ The reference to "No. 117" is strictly for internal organization at the office of plaintiff's counsel and should not be construed to mean that there have been 117 abuse victims of Defendants.

1 in the Central District of California. Venue is proper in the Central District of California
2 pursuant to 28 U.S.C. §1391(b)(2), (c)(1).

3
4 **FACTUAL ALLEGATIONS**

5 7. In or about 2003, Defendant GARY GODDARD, an adult male, contacted
6 Plaintiff, John Doe, a minor who was 14 years of age, located in the United Kingdom, telling
7 him that he had "good looks" and inquired whether he wanted to be an actor. Said contact was
8 made via use of electronic social media.
9

10 8. Defendant GARY GODDARD further advised John Doe that he knew people in
11 London and Hollywood who could help him in an acting career. He represented that one of the
12 individuals he knew who could help John Doe was BRYAN SINGER.
13

14 9. Upon information and belief, GODDARD and SINGER conspired in California to
15 identify minors in foreign countries for sex. They engaged in sexual acts with John Doe pursuant
16 to this conspiracy,

17 10. When John Doe was 14 or 15 years old, GODDARD sent John Doe
18 communications professing his love for John Doe, in order to groom John Doe to make him
19 compliant with GODDARD's ultimate sexual demands.
20

21 11. When John Doe was 15 years old, GODDARD sent him a package containing
22 Hershey chocolates in order to groom John Doe to make him compliant with GODDARD's
23 ultimate sexual demands.

24 12. When John Doe was 15 years old, GODDARD convinced Plaintiff to do the
25 following acts, which Plaintiff did: (i) send GODDARD nude photographs of himself; (ii) send
26 GODDARD a video of John Doe masturbating; and (iii) participate in a web-cam session in
27 which both John and GODDARD were nude and GODDARD was masturbating. During this
28

1 web-cam session, there was a knock at GODDARD's door and he quickly had to terminate the
2 session. All of these acts were done using electronic media in foreign commerce.

3 13. When John Doe was 15 or 16 years old, GODDARD invited John Doe to visit
4 him in London to discuss his career and see a show. GODDARD told John Doe to tell his parents
5 that GODDARD was his mentor and helping him to develop an acting career.
6

7 14. After the show, GODDARD took John Doe to his hotel and tried to kiss him.
8 John Doe resisted and told him he felt uncomfortable. GODDARD insisted, and GODDARD
9 convinced John Doe to remove his clothes. GODDARD and John Doe lied in bed together naked
10 and kissed.
11

12 15. When John Doe was 16 years old, GODDARD invited John Doe to London on
13 another trip, where GODDARD plied John Doe with alcohol and GODDARD then engaged
14 Plaintiff in anal intercourse.

15 16. On this trip when John Doe was 16 years old, GODDARD photographed John
16 Doe. GODDARD complained that John Doe would not allow "even a bit of [his] bum" showing
17 in the photograph.
18

19 17. Defendant GODDARD introduced the Plaintiff to Defendant BRYAN
20 SINGER over the telephone while GODDARD and SINGER were together in California.
21 Defendant GARY GODDARD attempted to convince the Plaintiff to travel to California to meet
22 the Defendants, however the Plaintiff would not agree.
23

24 18. When John Doe was 17 years old, GODDARD contacted him and advised
25 him that he and BRYAN SINGER were coming to London for an event and they wanted him to
26 meet them there. GODDARD instructed John Doe to take a train to London, and that Warner
27 Brothers would pay for his room and provide him tickets to the "Superman" movie premiere.
28

1 19. When John Doe arrived in London, BRYAN SINGER advised John that he was
2 going to ride with him, and John Doe would escort him to the "Superman" premiere.

3 20. BRYAN SINGER took John Doe to the after-party, and put BRYAN
4 SINGER's V.I.P. pass around John Doe's neck so he would have access. At that party, SINGER
5 offered John Doe a Quaalude, which John Doe rejected. Thereafter, SINGER gave John Doe a
6 drink which made John extremely intoxicated.
7

8 21. SINGER then invited John to the "after" after-party in his hotel suite. At
9 the suite, SINGER and GODDARD brought John into the bedroom under the pretext of showing
10 him "Superman" promotional memorabilia. Once in the bedroom, SINGER and GODDARD
11 started grabbing John Doe in a sexual manner. John Doe told them to stop, and that this made
12 him feel very uncomfortable. GODDARD then left the room and returned with a large,
13 musclebound man. Immediately, the large man began to smack John Doe around, using physical
14 violence, holding John while SINGER grabbed his buttocks. SINGER and the large man stripped
15 John of his clothing. John pleaded for them to stop. GODDARD, who was then naked on the
16 bed, instructed the large man to leave the room. SINGER grabbed John Doe's penis, kissed John
17 on his waist and thighs, and then placed his mouth on John's penis. SINGER told John to
18 fondle SINGER's penis, and John refused. SINGER then grabbed John's buttocks and attempted
19 to insert his fingers into John's anus. SINGER then removed his boxer shorts and John said, "I
20 do not want to do that." In response, SINGER said to John, "then just sit on top of me and
21 [masturbate]; I want you to [ejaculate] on me." John Doe, believing that the only way for him to
22 leave safely without being anally raped was to comply with SINGER's demands, sat on top of
23 SINGER and masturbated, ejaculating on SINGER. During this conduct, SINGER attempted to
24 penetrate John's anus with his penis.
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1 22. The next morning, Defendant SINGER contacted the Plaintiff and
2 apologized for "last night."

3 23. Plaintiff just only recently became cognizant that he has suffered
4 psychological and emotional injuries, mental anguish and loss of enjoyment of life as a result of
5 the Defendants' sexual acts. Such injuries are severe, continuing and permanent.
6

7 **COUNT I**

8 **(Federal Claim For Travel to Foreign Country For Illicit Conduct With**
9 **Minor and Transmission of Visual Depiction of Sexual Conduct of Minor)**
10 **(Against Defendant GARY GODDARD)**

11 24. Plaintiff, John Doe No. 117 repeats and realleges paragraphs 1 through 23 above
12 as if fully set forth herein.

13 25. For purposes of U.S. law, the age of consent is 18 years old.

14 26. The age of consent in a foreign country is irrelevant for purposes of 18 U.S. C.
15 §2423, under which the age of consent is 18 years of age.

16 27. An adult must not travel to a foreign country to have sex with a minor.
17

18 28. A dominant, significant and motivating reason for Defendant GODDARD, a
19 United States citizen, to travel in foreign commerce was for the purpose of engaging in illicit
20 sexual conduct with the Plaintiff.

21 29. Defendant GODDARD travelled in foreign commerce and engaged in illicit
22 sexual conduct with the Plaintiff.
23

24 30. At all relevant times, Plaintiff was under the age of 18 years.

25 31. Defendant GODDARD's acts were in violation of 18 U.S.C. §2423(b), (c).

26 32. An adult may not request and receive nude photographs of a minor.

27 33. An adult must not request and receive videos of a minor masturbating.
28

1 34. An adult must not engage in sex chatting with a minor on the internet.

2 35. Defendant GODDARD employed, used, induced, enticed or coerced the Plaintiff
3 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such
4 conduct or for the purpose of transmitting a live visual depiction of sexual conduct.

5 36. Defendant GODDARD used, persuaded, induced, enticed or coerced the Plaintiff
6 to engage in sexually explicit conduct outside the United States for the purpose of producing a
7 visual depiction of such conduct.

8 37. Defendant GODDARD's acts were in violation of 18 U.S.C. §2251(a), (b).

9 38. Plaintiff has suffered personal injuries as a result of the foregoing violations and
10 has the right to recover damages for such violations pursuant to 18 U.S.C. §2255.

11 39. The Plaintiff did not become aware of his injuries, nor was he able to make a
12 causal connection between his injuries and the acts and conduct of Defendant GODDARD in
13 violation of law until 2014. The nature of the harm caused by the sexual acts and statutory
14 violations committed by GODDARD were subtle, imperceptible and pernicious. The Plaintiff
15 for a period of years after the wrongs were committed was unaware that he had been affected by
16 Defendant GODDARD's acts. He could not reasonably have been expected to know that he had
17 been injured and that Defendant GODDARD had caused his injuries until 2014.

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21 **COUNT II**

22 **(Claim for Meeting With Minor to Engage in Lewd and**
23 **Lascivious Behavior in Violation of California Law)**
24 **(Against Defendant GARY GODDARD)**

25 40. Plaintiff repeats and realleges the allegations set forth in paragraph 1 through 23
26 above.

27 41. An adult must not arrange to meet a minor for sex.
28

1 42. The age of consent under California law is 18 years of age.

2 43. The age of consent in a foreign country is irrelevant for purposes of the
3 application of California law.

4 44. Defendant, GARY GODDARD, motivated by an unlawful or abnormal sexual
5 interest in children, arranged to meet with Plaintiff in London when Plaintiff was approximately
6 16 and 17 years old. Defendant GODDARD made all or a substantial part of such arrangements
7 with Plaintiff while in the State of California.
8

9 45. Defendant GARY GODDARD arranged to meet with the Plaintiff for the purpose
10 of exposing his or Plaintiff's genitals or rectal area, and or engaging in lewd or lascivious
11 behavior with the Plaintiff. Defendant GODDARD formed the intent to commit these acts
12 against Plaintiff while in the State of California, and made the arrangements to meet Plaintiff
13 with such intent.
14

15 46. Plaintiff was under the age of eighteen (18) years when Defendant GARY
16 GODDARD committed these acts and he was thus an under-aged injured member of the public
17 for whose benefit California Penal Code §288.4 was enacted, which thus authorizes this cause of
18 action pursuant to California Civil Code §3523.
19

20 **COUNT III**

21 **(Claim For Gender Violence in Violation of California Law)**
22 **(Against Defendant GARY GODDARD)**

23 47. Plaintiff repeats and realleges paragraphs 1 through 23 above.

24 48. An adult must not help someone else rape a minor.

25 49. As a result of the foregoing sexual acts and conduct, Plaintiff has been subjected
26 to gender violence.
27
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1 50. The acts of BRYAN SINGER in coercing and forcing Plaintiff to engage in
2 sexual conduct were a physical intrusion or physical invasion of a sexual nature. Defendant
3 GODDARD was present and aided and abetted SINGER, such that Plaintiff was forced by
4 SINGER to engage in sexual acts.

5 51. Defendant GARY GODDARD is a responsible party for the gender violence to
6 which Plaintiff was subjected.

8 COUNT IV

9 **(Claim For Violation of the Law of Nations under the**
10 **Alien Tort Statute, 28 U.S.C. §1350)**
11 **(Against Defendant BRYAN SINGER)**

12 52. Plaintiff, John Doe No. 117 repeats and realleges paragraphs 1 through 23 as set
13 forth above.

14 53. An adult must not rape a minor in a foreign country.

15 54. The Alien Tort Statute, 28 U.S.C. §1350, provides a civil remedy and federal
16 court jurisdiction for actions by an alien for a tort committed in violation of “the law of nations.”
17 Plaintiff John Doe is an alien citizen of the United Kingdom.

18 55. Sexual assault is universally a heinous, condemnable act. It is a violation of the
19 law of nations.

20 56. The sexual assault of Plaintiff by Defendant BRYAN SINGER emanated from
21 conduct that originated in the State of California, including the plan and scheme to entice,
22 persuade, induce or coerce Plaintiff into sexual acts and communications in foreign commerce
23 for said purpose.
24

25 57. Defendant SINGER violated the law of nations in engaging in sexual acts and
26 conduct with Plaintiff using physical force.
27
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COUNT V

**(Federal Claim For Travel to Foreign Country For
Illicit Conduct With Minor)
(Against Defendant BRYAN SINGER)**

58. Plaintiff, John Doe No. 117 repeats and realleges paragraphs 1 through 23 above as if fully set forth herein.

59. An adult must not travel to a foreign country to have sex with a minor.

60. An adult must not rape a minor in a foreign country.

61. A dominant, significant and motivating reason for Defendant SINGER, a United States citizen, to attend the “Superman” premiere in London was for the purpose of engaging in illicit sexual conduct with the Plaintiff.

62. Defendant SINGER travelled in foreign commerce and engaged in illicit sexual conduct with the Plaintiff.

63. At all relevant times, Plaintiff was under the age of 18 years.

64. Defendant SINGER’s acts were in violation of 18 U.S.C. §2423(b) and (c). Plaintiff has suffered personal injuries as a result of the foregoing violations and has a right to recover damages for such violations pursuant to 18 U.S.C. §2255.

65. The Plaintiff did not become aware of his injuries, nor was he able to make a causal connection between his injuries and the acts and conduct of Defendant SINGER, in violation of law until 2014. The Plaintiff could not personally have been expected to know that he had been injured and that Defendant SINGER had caused his injuries until 2014. The nature of the harm caused by the sexual assault and statutory violations committed by SINGER were subtle, imperceptible and pernicious. The Plaintiff for a period of years after the wrong was committed was unaware that he had been affected by Defendant SINGER’s acts. He could not

1 reasonably have been expected to know that he had been injured and that Defendant SINGER
2 had caused his injuries until 2014.

3 **COUNT VI**

4 **(Claim for Meeting With Minor to Engage in Lewd and**
5 **Lascivious Behavior in Violation of California Law)**
6 **(Against Defendant BRYAN SINGER)**

7 66. Plaintiff repeats and realleges the allegations set forth in paragraph 1 through 23
8 above.

9 67. An adult must not arrange to meet a minor for sex.

10 68. Defendant, BRYAN SINGER, motivated by an unlawful or abnormal sexual
11 interest in children, arranged to meet with Plaintiff in London when Plaintiff was approximately
12 17 years old. Defendant SINGER made all of a substantial part of such arrangements with
13 Plaintiff while in the State of California.
14

15 69. The age of consent under California law is 18 years of age.

16 70. The age of consent in a foreign country is irrelevant for purposes of the
17 application of California law.
18

19 71. Defendant BRYAN SINGER arranged to meet with the Plaintiff for the purpose
20 of exposing his or Plaintiff's genitals or rectal area, and or engaging in lewd or lascivious
21 behavior with the Plaintiff. Defendant Singer formed the intent to commit these acts against
22 Plaintiff while in the State of California, and made the arrangements to meet Plaintiff with such
23 intent.
24

25 72. Plaintiff was under the age of eighteen (18) years when Defendant BRYAN
26 SINGER committed these acts and he was thus an under-aged injured member of the public for
27
28

1 whose benefit California Penal Code §288.4 was enacted which thus authorizes this cause of
2 action pursuant to California Civil Code §3523.

3 **COUNT VII**

4 **(Claim For Gender Violence in Violation of California Law)**
5 **(Against Defendant BRYAN SINGER)**

6 73. Plaintiff repeats and realleges paragraphs 1 through 23 above.

7 74. An adult must not rape a minor.

8 75. As a result of the foregoing sexual acts, Plaintiff has been subjected to gender
9 violence.

10 76. The acts of Defendant BRYAN SINGER in coercing and forcing Plaintiff to
11 engage in sexual conduct were a physical intrusion or physical invasion of a sexual nature.

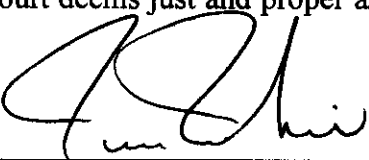
12 77. Defendant BRYAN SINGER is a responsible party for the gender violence to
13 which Plaintiff was subjected.
14

15
16 **WHEREFORE, PLAINTIFF PRAYS FOR JUDGMENT AGAINST DEFENDANT,**
17 **AS TO THE CAUSES OF ACTION, AS FOLLOWS:**

- 18
19 1. General, special and consequential damages according to proof at time of trial;
20 2. Reasonable value of all medical expenses, medications, hospitalizations, therapy,
21 counseling and other related expenses, according to proof at time of trial;
22 3. Loss of earning capacity, according to proof at time of trial;
23 4. For costs of the suit incurred herein;
24 5. For pre-judgment interest according to proof, pursuant to Civil Code §3291;
25 6. For statutory damages and attorney's fees pursuant to 18 U.S.C. §2255(a);
26 7. For attorney's fees and costs pursuant to California Civil Code §52.4(a);
27 8. For punitive and exemplary damages; and
28

9. Such other further relief this Court deems just and proper and/or is appropriate under

1
2 law.
3 Dated: 5/3/14

4 By: 
5 Kevin M. McGuire, Esq. (Cal. Bar No. 164895;
6 themcguirelawfirm@yahoo.com)
7 The McGuire Law Firm
8 43460 Ridge Park Drive, Suite 200
9 Temecula, CA 92590

10 and

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