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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

JANE DOE,

Plaintiff,

v.

CISSY STEELE, AKA CISSY GERALD;  
DIABOLIC VIDEO PRODUCTIONS, INC.;  
BLACK ICE LTD.; ZERO TOLERANCE  
ENTERTAINMENT, INC.; THIRD  
DEGREE FILMS; AND ELEGANT  
ANGEL, INC.,

Defendants.

Case No.: '20CV1818 MMAMSB

**COMPLAINT FOR:**

- (1) VIOLATION OF THE  
TRAFFICKING VICTIMS  
PROTECTION ACT, 18 U.S.C. §§  
1591(a);
- (2) PARTICIPATING IN A VENTURE IN  
VIOLATION OF THE  
TRAFFICKING VICTIMS  
PROTECTION ACT, 18 U.S.C. §§  
1591(a);
- (3) CONSPIRACY TO COMMIT  
VIOLATION OF THE  
TRAFFICKING VICTIMS  
PROTECTION ACT, 18 U.S.C. §§  
1594;
- (4) PRELIMINARY INJUNCTION; and
- (5) VIOLATIONS OF CALIFORNIA  
LABOR CODE

**JURY TRIAL DEMANDED**

1 **VERIFIED COMPLAINT**

2 This is a civil action for damages under the United States federal sex trafficking  
3 statute, 18 U.S.C. §§ 1591, *et seq.*, arising out of Defendants’ sex trafficking of Plaintiff  
4 Jane Doe in the States of California and Nevada. Defendant Cissy Steele, AKA Cissy  
5 Gerald (“Steele”), using interstate commerce, recruited, lured, and enticed Jane Doe with  
6 false promises of lucrative acting and modeling opportunities to sell her for sex. Steele  
7 further coerced Jane Doe into engaging in commercial sex acts, knowing that she would use  
8 means of force, fraud, and/or intimidation to coerce Jane Doe into engaging in said  
9 commercial sex acts.

10 Defendants Diabolic Video Productions, Inc. (“Diabolic”), Black Ice Ltd. (“Black  
11 Ice”), Zero Tolerance Entertainment, Inc. (“Zero Tolerance”), Third Degree Films (“Third  
12 Degree”), and Elegant Angel, Inc. (“Elegant Angel”) (collectively, “Adult Film  
13 Companies”), were instrumental in knowingly aiding, abetting, facilitating, and  
14 participating in Steele’s sex trafficking scheme, while knowing, or in reckless disregard of  
15 the fact, that she would use means of force, fraud, and/or coercion to force Jane Doe into  
16 engaging in commercial sex acts in violations of the Trafficking Victims Protection  
17 Reauthorization Act (“TVPRA”). The Adult Film Companies failed to pay Jane Doe for her  
18 work, albeit performed out of duress and involuntarily, and the Adult Film Companies  
19 profited from Jane Doe’s forced labor.

20 **INTRODUCTION**

21 1. Steele targeted and groomed Jane Doe for the sole purpose of sex trafficking  
22 her, in violation of the TVPRA, so that she could profit from Jane Doe’s forced commercial  
23 sex acts.

24 2. Steele preyed upon Jane Doe’s vulnerabilities and used means of fraud and  
25 coercion to sex traffic Jane Doe, including misrepresenting herself as a talent agent that  
26 could provide Jane Doe with lucrative modeling and acting opportunities, all the while  
27 intending to sex traffic her.

1           3.       Steele coerced and lured Jane Doe to move into her home with her under false  
2 pretenses, namely, by fraudulently promising that she would make Jane Doe a model.

3           4.       After Jane Doe moved in with Steele, Steele used psychological manipulation  
4 and coercion, intimidation tactics, threats, and physical violence to control, dominate and  
5 exploit Jane Doe.

6           5.       Steele forced Jane Doe to engage in commercial sex acts with men at hotels  
7 in Los Angeles, CA and Las Vegas, NV, as well as other locations in Southern California,  
8 the details not specifically known to Jane Doe at this time. Steele forced Jane Doe to give  
9 her the money from these commercial sex acts so she could profit from trafficking Jane  
10 Doe.

11          6.       Steele also forced Jane Doe to perform in pornographic videos for the Adult  
12 Film Companies against her will and Steele was paid directly by the Adult Film Companies  
13 for providing Jane Doe for use in their videos. The Adult Film Companies failed to pay Jane  
14 Doe for work performed on their behalf while she acted as an employee for them, although  
15 performing work involuntarily.

16          7.       Steele had an on-going relationship with the Adult Film Companies and the  
17 Adult Film Companies knew or should have known of Steele's sex trafficking venture,  
18 including her sex trafficking of Jane Doe. Far from taking any corrective measures, the  
19 Adult Film Companies ratified and perpetuated the human trafficking scheme by continuing  
20 to facilitate the production of pornography using Jane Doe and other women while paying  
21 Steele directly.

22          8.       The Adult Film Companies participated in Steele's sex trafficking venture,  
23 knowing she was using means of fraud, force, and coercion to traffic Jane Doe, because  
24 they knowingly benefited from her illegal venture by selling videos and posting videos  
25 through online websites that featured Jane Doe for profit.

26          9.       Steele's conduct violates the TVPRA because she knowingly used means of  
27 force, fraud, and coercion to force Jane Doe to engage in commercial sex so that she could  
28 profit from the activity.



1           20.     Upon information and belief, Defendant Diabolic Video Productions, Inc. is  
2 a California corporation with its principal place of business located at 20525 Nordhoff, Suite  
3 4, Chatsworth, California. Diabolic is a pornographic film studio that was founded in 1998.  
4 Diabolic solely paid Steele directly for the coerced work of Plaintiff Jane Doe.

5           21.     Upon information and belief, Elegant Angel, Inc. is a California corporation  
6 with its principal place of business located 20821 Dearborn Street, Chatsworth, California.  
7 Elegant Angel is a pornographic film studio that was founded in 1990. Elegant Angel solely  
8 paid Steele directly for the coerced work of Plaintiff Doe.

9           22.     Upon information and belief, Defendant Black Ice Ltd. is a California  
10 corporation with its principal place of business located at 20525 Nordhoff Suite 4,  
11 Chatsworth, California. Black Ice is a pornographic film studio that was founded in 2005  
12 under the umbrella company, Third Degree Films. Black Ice solely paid Steele directly for  
13 the coerced work of Plaintiff Jane Doe.

14           23.     Upon information and belief, Defendant Zero Tolerance Entertainment, Inc.  
15 is a California corporation with its principal place of business also located a 20525  
16 Nordhoff, Suite 25, Chatsworth, California. Zero Tolerance is a pornographic film studio  
17 that was founded in 2002 under the umbrella company, Third Degree Films. Zero Tolerance  
18 is a ‘mere continuation’ or ‘alter ego’ corporation of Black Ice in that there is substantial  
19 continuity between the business operations of Black Ice and Zero Tolerance and the  
20 principal assets of Black Ice, or all or substantially all of Black Ice’s assets, were transferred  
21 for less than fair value to Zero Tolerance and Greg Alves (“Alves”) and Greg Dunn  
22 (“Dunn”) were officers, directors, or stockholders of both corporations. Additionally, as  
23 officers, directors, or stockholders of both corporations, Alves and Dunn had notice of the  
24 wrongful conduct alleged herein.

25           24.     Individually and through their agents, associates, attorneys, or employees, all  
26 Defendants have done or are doing business in Los Angeles, California. At all relevant  
27 times, Defendants operated enterprises engaged in interstate commerce or in the production  
28 of goods for interstate commerce.





13 28. Steele told Jane Doe that she could make her a model and gave her a business  
14 card, which listed her talent agency as “Royal Loyalty Management.”

15 29. Approximately one week later, Steele called Jane Doe and arranged to come  
16 to her home, under the false pretense of discussing a modeling career.

17 30. While at Jane Doe’s home, Steele again promised her that she could make her  
18 a modeling star. She told Jane Doe that she knew a multi-millionaire, influential fashion  
19 designer that was looking for models and that she could introduce her to him.

20 31. In October 2009, Steele lured and enticed Plaintiff to move into her home with  
21 her, in reliance on Steele’s promise that it would help her career as a model.

22 32. Initially, Steele arranged for Plaintiff to do several modeling photo shoots,  
23 which reinforced her belief that Steele was a talent agent that would help her pursue a  
24 modeling career. Steele also continued to promise to introduce her to the fashion designer.

25 33. After approximately four or five months, however, Steele’s demeanor towards  
26 Jane Doe began to change. Steele became both mentally and physically abusive to Jane  
27 Doe.

1 34. Steele began to degrade Jane Doe and told her that she would never make it  
2 as a model or actress. Eventually, Steele told Jane Doe that the only way she would be a  
3 model or actress was to do pornographic films, but Jane Doe declined.

4 35. When Jane Doe refused to comply with Steele's orders, Steele began  
5 constantly threatening Jane Doe and her family. Steele threatened to have Jane Doe's dog  
6 killed on several occasions and also threatened to have people harm Jane Doe's family if  
7 Jane Doe did not comply with Steele's demands. Steele also physically abused Jane Doe,  
8 often using physical violence, if Jane Doe did not obey Steele.

9 **II. Steele Forced Jane Doe to Engage in Commercial Sex Acts, Using Fraud,**  
10 **Threats, and Physical Force.**

11 36. Although Steele eventually did introduce Jane Doe to the influential fashion  
12 designer, as she promised, the sole purpose was to provide Jane Doe to him for commercial  
13 sex acts—not to help her pursue a modeling career as she told Jane Doe.

14 37. The fashion designer was a man named Peter Nygard, a man who is currently  
15 engaged in a lawsuit in which he has been sued for sex trafficking and rape.

16 38. Steele told Jane Doe that they were going to a party at the fashion designer's  
17 home so that they could discuss potential modeling opportunities. Steele did not tell Jane  
18 Doe that the fashion designer had paid Steele for commercial sex acts with Jane Doe.

19 39. Once they were at the party, Steele provided Jane Doe to the fashion designer  
20 for commercial sex acts.

21 40. Steele also began forcing and/or coercing Jane Doe to engage in commercial  
22 sex acts with other men in Los Angeles, CA and Las Vegas, NV.

23 41. Steele would set-up "dates" for Jane Doe and would negotiate the payment  
24 rates with the men in advance.

25 42. Steele would then drive Jane Doe to the "dates" at various hotels in the Los  
26 Angeles area, selected by the "clients," where Plaintiff was forced and/or coerced to engage  
27 commercial sex acts with them.  
28

1 43. Steele would wait in the car for Jane Doe while Jane Doe performed  
2 commercial sex acts with the men. When Jane Doe returned to the car, Steele would collect  
3 the money from her. If Jane Doe attempted to withhold any money from Steele, Steele  
4 would use physical violence against Jane Doe.

5 44. Steele forced and/or coerced Jane Doe to engage in commercial sex acts with  
6 men, on average, two to three times per day, seven days per week. Steele always collected  
7 the money from Jane Doe.

8 45. Steele would also force Jane Doe to travel to Las Vegas with her to engage in  
9 commercial sex acts with men, working out of the Mandalay Bay Hotel. Steele forced Jane  
10 Doe to ingest ecstasy while in Las Vegas in order to keep her active and “working.” Jane  
11 Doe made approximately \$1,000 to \$3,000 each night while in Las Vegas and was forced  
12 to give all the money to Steele.

13 46. Steele also had several other young women working for her while she was in  
14 Las Vegas. Steele referred to the girls that she forced and coerced to work for her as her  
15 “bitches.” The girls that made her the most money received special treatment and/or  
16 privileges. Those who did not earn as much as Steele expected were punished and/or beaten.

17 **III. Steele Forced Jane Doe to Perform in Pornographic Videos for the Adult Film**  
18 **Companies Against her Will and the Adult Film Companies Knew, or Were in**  
19 **Reckless Disregard of the Fact, That Steele was Trafficking Jane Doe.**

20 47. Steele has a longstanding relationship with the Adult Film Companies and  
21 speaks with their executives and/or agents on a regular basis. Jane Doe overheard Steele  
22 speaking with representatives of the Adult Film Companies on the phone, offering Jane Doe  
23 and other women to perform sexual acts as an actor in pornographic videos.

24 48. Upon information and belief, the Adult Film Companies only paid Steele for  
25 Jane Doe’s coerced pornography production. The Adult Film Companies never financially  
26 compensated Plaintiff or any of the other “Steele girls” for the work they performed.  
27 Defendant Adult Film Companies either never obtained written consent or established any  
28 kind of contractual relationship with Jane Doe, or any such “release” was signed under

1 duress, for the services rendered but nevertheless profited, along with Steele, off of the  
2 production and publication of the pornography Jane Doe took part in.

3 49. During 2010, Steele forced Plaintiff to do pornographic films for the Adult  
4 Film Companies. When Jane Doe protested, Steele threatened her and her family with  
5 violence and also physically struck Jane Doe.

6 50. Based on Steele's physical violence to Jane Doe and threats of physical  
7 violence to Jane Doe and her family, Jane Doe was in fear of harm and complied with  
8 Steele's demands and instructions.

9 51. Steele would transport Jane Doe to the Adult Film Companies' studios. Jane  
10 Doe would go inside and sexually perform as instructed and directed by the Adult Film  
11 Companies' employees and Steele. Afterwards, Jane Doe would call Steele, as instructed,  
12 and Steele would pick Jane Doe up from the Adult Film Companies' production studios and  
13 transport her back to her residence.

14 52. The Adult Film Companies paid Steele directly for Jane Doe's performance  
15 in the pornographic films, usually a few weeks later by check, knowing or recklessly  
16 disregarding the fact that Steele was coercing and/or forcing Jane Doe to perform in the  
17 pornographic films.

18 53. Jane Doe never saw the checks that Steele received from the Adult Film  
19 Companies and does not know how much she was paid for providing Jane Doe to the Adult  
20 Film Companies. Jane Doe never received any money for her performance in any of the  
21 pornographic films that she did for the Adult Film Companies.

22 **IV. Jane Doe Escaped from Steele.**

23 54. Jane Doe was forced and/or coerced to participate in Steele's sex trafficking  
24 scheme. Steele constantly threatened Jane Doe, saying "you don't want to know what will  
25 happen to you" if she left. Steele also threatened to have Jane Doe killed, threatened her  
26 family, and threatened to kill her dog if she did not cooperate.

27  
28

1           55.     Steele would commit physical violence against Jane Doe if she resisted or did  
2 not cooperate. Steele, on numerous occasions, would exert control over Jane Doe by forcing  
3 her to take illicit drugs, thus making Jane Doe dependent on her.

4           56.     As a direct result of Steele’s threats, violence, and coercion, Jane Doe was  
5 afraid to leave.

6           57.     In late 2010, Jane Doe became suicidal. Despite the threats to her and her  
7 family, she felt that she had to escape or she would kill herself.

8           58.     Jane Doe began secretly looking for places to live when she was left alone by  
9 Steele. Jane Doe was able to find a friend that agreed to let her move in with her, since Jane  
10 Doe did not have any money.

11          59.     Jane Doe secretly began moving some of her things to her friend’s home when  
12 Steele was not around. Jane Doe was eventually able to escape Steele’s control one night  
13 in the middle of the night and never went back.

14          60.     After escaping, Jane Doe changed her phone number and ceased all  
15 communication with Steele.

16 **V.     Steele Continued to Threaten Jane Doe and Her Family After Jane Doe Escaped.**

17          61.     After Jane Doe escaped Steele’s control, Steele began calling Jane Doe’s  
18 mother and neighbor, threatening them and Jane Doe if she did not return. Steele made  
19 threatening calls to Jane Doe’s neighbor and mother almost every week after Jane Doe left  
20 her control.

21          62.     Steele threatened to find Jane Doe and hunt her down if she did not return  
22 and/or if she did not remain silent about Steele’s sex trafficking scheme.

23          63.     Steele also attempted to lure and entice Jane Doe to return back to her control  
24 by promising to pay her and buy her things.

25          64.     Due to Steele’s psychological manipulation, constant threats, and physical  
26 abuse, Jane Doe was too afraid to report Steele to authorities out of fear for her own well-  
27 being and the well-being of her family.

28

1 **VI. Plaintiff's Claims are within the Statute of Limitations; alternatively, the Statute**  
2 **of Limitations Should be Tolled Because Steele Uses Threats and Force to**  
3 **Prevent Victims from Pursuing Their Claims.**

4 65. Plaintiff was sex trafficked from 2009 until 2011, when she escaped from  
5 Steele.

6 66. Plaintiff's claims against Defendants for actions occurring between 2010 until  
7 2011 include claims against Steele and the Adult Film Companies for conspiracy to violate  
8 Section 1591's ban on sex trafficking.

9 67. Steele and the Adult Film Companies conspiracy to violate Section 1591  
10 continued from at least 2010 until Plaintiff's escape in 2011.

11 68. Because Plaintiff's claims regarding conduct occurring before 2011 are based  
12 on a continuing conspiracy, their timeliness is assessed based on when the conspiracy  
13 ended.

14 69. Steele and the Adult Film Companies' sex trafficking conspiracy continued  
15 until at least 2011, which is within Section 1595's ten-year statute of limitations.

16 70. Plaintiff's claims, including those for conduct occurring before 2011, are thus  
17 timely.

18 71. In the alternative, due to extraordinary circumstances and Steele's conduct,  
19 which prevented, to the extent applicable, Plaintiff from bringing her claims, the applicable  
20 statute of limitations is equitably tolled for all of Plaintiff's claims for actions occurring  
21 during the time of Plaintiff's exploitation, ending in 2011.

22 72. The general rule is that statutes of limitations are subject to equitable tolling.  
23 *See United States v. Locke*, 471 U.S. 84, 94 n.10 (1985) ("Statutory filing deadlines are  
24 generally subject to the defenses of waiver, estoppel, and equitable tolling."); *Young v.*  
25 *United States*, 535 U.S. 43, 49 (2002) ("It is hornbook law that limitations periods are  
26 customarily subject to equitable tolling unless tolling would be inconsistent with the text of  
27 the relevant statute.") (quotation marks and citations omitted).

1 73. Plaintiff, to the extent applicable here, pursued her rights diligently and she  
2 was impeded because of a combination of force, threats of force, shame, embarrassment,  
3 fear, and weak laws that are rarely enforced to protect the victim. As a result, to the extent  
4 necessary, all applicable statutes of limitations should be equitably tolled as to claims for  
5 conduct occurring before 2011.

6 74. To the extent that Plaintiff was unable to pursue her claims for conduct  
7 occurring before 2011, she was legitimately and justifiably afraid that Steele would harm  
8 and/or retaliate against her and her family if she pursued any claim against her and others.

9 75. As discussed herein, Steele used physical violence and financial pressure to  
10 intimidate Plaintiff and prevent her from coming forward.

11 76. Due to Steele's power and intimidation tactics and violence, Plaintiff  
12 reasonably believed that she and her family were in mortal danger.

13 77. Steele has close associations with shadowy figures with histories of violence  
14 and intimidation.

15 **CLAIMS ALLEGED**

16 **COUNT I**

17 **VIOLATION OF THE TRAFFICKING VICTIMS PROTECTION ACT,**  
18 **18 U.S.C. §§ 1591(a)**

19 78. Plaintiff realleges and incorporates by reference the allegations contained in  
20 paragraphs 1-77, as if fully set forth in this Count.

21 79. Steele knowingly used the instrumentalities and channels of interstate and  
22 foreign commerce to facilitate violations of 18 U.S.C. § 1591(a)(1), occurring within the  
23 territorial jurisdiction of the United States.

24 80. Steele's conduct was in or affecting interstate or foreign commerce for  
25 purposes of the TVPRA.

26 81. Steele knowingly recruited, enticed, harbored, transported, provided,  
27 obtained, advertised, maintained, patronized, or solicited Jane Doe for the purpose of  
28

1 causing her to engage in a commercial sex acts, through the use of force, fraud, and/or  
2 coercion, pursuant to 18 U.S.C. § 1591(a).

3 82. Jane Doe engaged in commercial sex acts with different men, due to Steele's  
4 use of force, fraud and/or coercion.

5 83. Steele fraudulently promised or promised to provide Jane Doe something of  
6 value in exchange for each sexual act, including a future modeling career and/or portions of  
7 the profits obtained from her commercial sex acts.

8 84. Steele received financial compensation for Jane Doe's sex trafficking.

9 85. Steele's conduct has caused Jane Doe serious and permanent harm, including,  
10 without limitation, physical, psychological, financial, and reputational harm, that is  
11 sufficiently serious, under all the surrounding circumstances, to compel a reasonable person  
12 of the same background and in the same circumstances to perform or to continue performing  
13 commercial sexual activity, in order to avoid incurring that harm.

14 **COUNT II**

15 **PARTICIPATING IN A VENTURE IN VIOLATION OF**  
16 **THE TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. §§ 1591(a)**

17 86. Plaintiff realleges and incorporates by reference the allegations contained in  
18 paragraphs 1-77, as if fully set forth in this Count.

19 87. Defendants participated in a venture together, in violation of 18 U.S.C. §  
20 1591(a)(2).

21 88. The Adult Film Companies knowingly benefited from, and received value for,  
22 their participation in the venture, in which Steele, with the Adult Film Companies'  
23 knowledge, or in reckless disregard of the fact, that Steele would defraud, force, and/or  
24 coerce Jane Doe to engage in commercial sex acts.

25 89. The Adult Film Companies knew or were in reckless disregard of the fact that  
26 it was Steele's pattern and practice to use the interstate commerce and the resources  
27 provided by the Defendants to entice and recruit young aspiring female models into  
28 commercial sex acts based on the promise of lucrative modeling opportunities. The Adult

1 Film Companies' employees and/or agents had actual knowledge that they were facilitating  
2 and participating in Steele's scheme to recruit, entice, coerce, and/or solicit Jane Doe into  
3 commercial sex acts, through the use of force, fraud, and/or coercion.

4 90. Despite such knowledge, the Adult Film Companies facilitated and  
5 participated in Steele's violations of 18 U.S.C. § 1591, where they knew, or were in  
6 reckless disregard of the facts that Steele would use coercion, fraud, and/or force to get Jane  
7 Doe, an aspiring young model, to engage in commercial sex acts.

8 91. The Adult Film Companies knowingly benefited financially and/or personally  
9 from Steele's sex-trafficking venture and the exploitation of Jane Doe.

10 92. By facilitating and participating in Steele's sex trafficking venture, the Adult  
11 Film Companies profited from Jane Doe's forced and/or coerced participation in their  
12 pornographic films.

13 93. By facilitating and participating in Steele's sex trafficking venture, received  
14 sex from Jane Doe and other women under Steele's control.

15 94. The Adult Film Companies' conduct has caused Jane Doe serious harm  
16 including, without limitation, physical, psychological, financial, and reputational harm, that  
17 is sufficiently serious, under all the surrounding circumstances, to compel a reasonable  
18 person of the same background and in the same circumstances to perform or to continue  
19 performing commercial sexual activity, in order to avoid incurring that harm.

20 **COUNT III**

21 **CONSPIRACY TO COMMIT VIOLATION OF THE**  
22 **TRAFFICKING VICTIMS PROTECTION ACT, 18 U.S.C. §§ 1594**

23 95. Plaintiff realleges and incorporates by reference the allegations contained in  
24 paragraphs 1-77, as if fully set forth in this Count.

25 96. The Adult Film Companies conspired with Steele, by agreement or  
26 understanding, to further Steele's unlawful plan and/or purpose to commit illegal  
27 commercial sex acts with Jane Doe.

1 97. The Adult Film Companies committed overt acts in furtherance of the  
2 agreement or understanding by knowingly using Jane Doe, against her will, to perform in  
3 their pornographic films and/or to engage in sexual activity and paying Steele for such use.

4 98. The Adult Film Companies' participation in the furtherance of Steele's illegal  
5 sex trafficking plan and/or purpose was intentional and/or willful and, therefore, the Adult  
6 Film Companies intentionally and/or willfully caused Jane Doe's commission of the sex  
7 acts in their affirmative acts supporting Steele.

8 99. The Adult Film Companies knew that their acts and conduct supporting and  
9 facilitating Steele would lead to commercial sex acts by Jane Doe.

10 100. The Adult Film Companies conspired with Steele through their affirmative  
11 acts and provided substantial support to Steele forcing and/or coercing Jane Doe to engage  
12 in commercial sex acts.

13 101. The Adult Film Companies conduct has caused Jane Doe serious harm,  
14 including, without limitation, physical, psychological, financial, and reputational harm, that  
15 is sufficiently serious, under all the surrounding circumstances, to compel a reasonable  
16 person of the same background and in the same circumstances to perform or to continue  
17 performing commercial sexual activity in order to avoid incurring that harm.

18 **COUNT IV**

19 **PRELIMINARY INJUNCTION**

20 102. Plaintiff realleges and incorporates by reference the allegations contained in  
21 paragraphs 1-77, as if fully set forth in this Count.

22 103. Unless this Court enjoins Defendants from promoting, publishing,  
23 disseminating, and/or selling pornographic videos featuring Plaintiff Jane Doe, she will  
24 continue to sustain irreparable harm in the form of emotional distress and reputational  
25 damage.

26 104. Plaintiff Jane Doe has no adequate remedy at law to cure this problem, as  
27 monetary damages will not suffice.

1 105. Unless an injunction is issued, Defendants will continue to promote, publish,  
2 disseminate, and/or sell pornographic videos featuring Plaintiff Jane Doe and Plaintiff will  
3 continue to suffer irreparable harm.

4 106. Videos featuring Plaintiff Jane Doe are currently being promoted, published,  
5 and/or disseminated on the internet and through other means, including, without limitation,  
6 the following:

7 <https://m.sss.xxx/imani%20rose/longest/>

8 <https://streamporn.pw/actor/tatum-onassis/>

9 <https://eroticax.org/xfsearch/name-link/Tatum+Onassis/>

10 <https://eroticax.org/xfsearch/name-link/Tatum+Onassis/>

11 <https://eroticax.org/xfsearch/name-link/Tatum+Onassis/>

12 <http://xxnx.ink/search/imani-rose-and-tatum-onassis-pu.php>

13 <http://www.dvdtrailertube.com/Tatum-Onassis-movies.html>

14 <http://www.dvdtrailertube.com/-Elegant-Angel-trailer-24922.html>

15 <https://1337x.unblocked.to/torrent/4331147/Breast-Beginnings-Diabolic-Video-Natasha-Dulce-Tatum-Onassis-Mariah-Love-Giselle-Taylor-Breanna-Getz/>

16 <https://pornfile.xxx/2017/02/13/diabolic-breast-beginnings-tatum-onassis-daniel-hunter-anus-external-lingerie/>

17 <http://www.iafd.com/results.asp?searchtype=comprehensive&searchstring=Tatum+onassis>

18 <http://www.iafd.com/person.rme/perfid=tatumonassis/gender=f/tatum-onassis.htm>

19 [http://www.jadedvideo.com/artist/Tatum\\_Onassis.6-52388.html](http://www.jadedvideo.com/artist/Tatum_Onassis.6-52388.html)

20 <https://www.mrporn.com/pornstar-Tatum-Onassis.html>

21 <http://freeones.mallcom.com/pornstar.html?id=7018>

1 [https://tubexxone.com/en/oneddir/dW0tMjQ4LTExNzUwNjkx/Anal-  
2 -Threesome-With-Imani-Rose-And-Tatum-Onassis/](https://tubexxone.com/en/oneddir/dW0tMjQ4LTExNzUwNjkx/Anal-Threesome-With-Imani-Rose-And-Tatum-Onassis/)

3 <http://eupornotube.com/search/Tatum-Onassis/longest.htm>  
4

5 107. Plaintiff Jane Doe is entitled to preliminary and permanent injunctive relief,  
6 including prohibiting Defendants from continuing to promote, publish, disseminate, and/or  
7 sell any pornographic videos featuring Plaintiff Jane Doe.

8 **COUNT V**

9 **VIOLATIONS OF CALIFORNIA LABOR CODE sections 201 *et. seq.***  
10 **(AGAINST DEFENDANTS ADULT FILM COMPANIES)**

11 108. Plaintiff Jane Doe realleges and incorporates by reference the allegations  
12 contained in paragraphs 1-77, as if fully set forth in this Count.

13 109. Plaintiff was forced to work for Adult Film Companies. Adult Film  
14 Companies failed to pay Jane Doe for work she performed for the benefit of Adult Film  
15 Companies, in violation of California law and the California Labor Code, including but not  
16 limited to sections 201, 1194 and 226.8.

17 110. There is a presumption in California that all persons performing work for the  
18 benefit of another are considered employees. Although not performing the services  
19 voluntarily, the Adult Film Companies were still required to pay Jane Doe for services she  
20 provided for their benefit. Instead, the Adult Film Companies never paid Jane Doe for work  
21 she performed, although the Adult Film Companies profited substantially.

22 111. The Adult Film Companies owe Jane Doe unpaid wages for all work she  
23 performed while acting as an employee of the Adult Film Companies. Jane Doe is also  
24 entitled to statutory penalties and back pay damages against Adult Film Companies for their  
25 negligent or intentional failure to pay her all wages owed for services performed.

26 112. Defendants either intentionally or negligently never provided wage statements  
27 to Jane Doe and did not provide her with annual tax statements identifying the hours of  
28 work she performed.

1 113. As a result of the Adult Film Companies failure to pay Jane Doe any wages,  
2 she was not paid minimum wage, a separate violation of California regulations and Labor  
3 Code.

4 114. As a result of Adult Film Companies conduct, Jane Doe has suffered monetary  
5 damages, including owed wages, statutory penalties and interest and attorneys' fees.

6 **REQUEST FOR RELIEF**

7 Plaintiff respectfully requests that the Court enter judgment in her favor, and against  
8 Defendants, as follows:

9 a. That the Court grant permanent injunctive relief to prohibit Defendants from  
10 continuing to engage in the unlawful acts and practices described herein;

11 b. A finding of an alter ego between Black Ice Entertainment Ltd, Zero  
12 Tolerance Entertainment and Third Degree Films Inc, thus piercing the corporate veil;

13 c. That the Court award Plaintiff compensatory, consequential, general, and  
14 nominal damages in an amount to be determined at trial;

15 d. Requiring restitution and disgorgement of all profits and unjust enrichment  
16 obtained as a result of Defendants' unlawful conduct;

17 e. That the Court award punitive or exemplary damages in an amount to be  
18 determined at trial;

19 f. That the Court award to Plaintiff the costs and disbursements of the action,  
20 along with reasonable attorneys' fees, costs, and expenses;

21 g. That the Court award statutory damages and penalties;

22 h. That the Court award pre- and post-judgment interest at the maximum legal  
23 rate; and

24 i. That the Court grant all such other relief as it deems just and proper.

25 ///

26 ///

27 ///

28 ///

**JURY DEMAND**

Plaintiff demands a trial by jury on all claims so triable.

Dated: September 15, 2020

By: /s/ John H. Gomez

John H. Gomez, Esq.

Deborah S. Dixon, Esq.

**GOMEZ TRIAL ATTORNEYS**

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*\*Pro Hac Vice Application Pending*

***Counsel for Plaintiff Jane Doe***

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Jane Doe

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Gomez Trial Attorneys  
John H. Gomez and Deborah S. Dixon  
655 W. Broadway, Ste. 1700, San Diego, CA 92101; (619) 237-3490

**DEFENDANTS**

Cissy Steele, AKA Cissy Gerald; Diabolic Video Productions, Inc.; Black Ice Ltd.; Zero Tolerance Entertainment, Inc.; Third Degree Films; and Elegant Angel, Inc.

County of Residence of First Listed Defendant Los Angeles, CA  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**'20CV1818 MMAMSB**

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	FEDERAL TAX SUITS
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

**V. ORIGIN** (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
18 U.S.C. Section 1591, et seq.

Brief description of cause:  
Sex trafficking of Plaintiff in the States of California and Nevada.

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ \_\_\_\_\_

CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE: 09/15/2020 SIGNATURE OF ATTORNEY OF RECORD: /s/ John H. Gomez

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.