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18 **SUPERIOR COURT OF CALIFORNIA**  
19 **COUNTY OF LOS ANGELES**

20 C.D.,

Case No.

21 Plaintiff,

**COMPLAINT**

22 v.

- 23 1. Sexual Assault
- 24 2. Sexual Battery
- 25 3. Sexual Harassment
- 26 4. Gender Violence
- 27 5. Assault
- 28 6. Battery
7. Intentional Infliction of Emotional Distress
8. Negligence

ERIC WEINBERG and DOES 1-10,

Defendants.

**Jury Trial Demanded**

1 **INTRODUCTION**

2 1. In February 2019, Defendant Eric Weinberg lured Plaintiff C.D. to his  
3 home where he sexually assaulted her. Weinberg had offered to help C.D. start a  
4 modeling career and booked her for a photo shoot, but once he had her alone on his  
5 property, he touched her breasts, demanded sexual poses, forcibly inserted his fingers  
6 into her anus, performed oral sex on her, and demanded her to perform oral sex on him.

7 2. This was not an isolated incident for Weinberg, a Hollywood producer  
8 who has been criminally charged for sexually assaulting multiple women after luring  
9 them to his home. As Judge Victoria B. Wilson found at a recent bail revocation hearing,  
10 the allegations against Weinberg indicate “that he cannot stop and will not stop his  
11 sexual assaults on women; and, therefore, he poses a danger to the safety of women.”

12 3. Plaintiff C.D. suffered physical, emotional, and economic harm as a result  
13 of Weinberg’s assault and brings this action for sexual assault, sexual battery, sexual  
14 harassment, gender violence, assault, battery, intentional infliction of emotional  
15 distress, and negligence.

16 **JURISDICTION AND VENUE**

17 4. This Court has jurisdiction over the subject matter of this action pursuant  
18 to Article VI, section 10 of the California Constitution and section 410.10 of the  
19 California Code of Civil Procedure.

20 5. Venue is proper in this Court under Code of Civil Procedure section 395  
21 because Eric Weinberg resides in Los Angeles County. In addition, a substantial part of  
22 the conduct and omissions giving rise to the violations of law alleged herein occurred in  
23 Los Angeles County.

24 **PARTIES**

25 6. Plaintiff C.D. is a citizen and resident of Los Angeles, California. Plaintiff  
26 is using a pseudonym in this litigation to protect her privacy and, if required by the  
27 Court, will seek permission to proceed under this pseudonym.



1 13. C.D. is a neurodivergent young woman who has been diagnosed with  
2 ADHD, which makes her less attuned to social cues and particularly vulnerable to a  
3 sexual predator like Weinberg.<sup>1</sup>

4 14. When Weinberg first approached C.D., and in their subsequent text  
5 messages, he presented himself as a safe and respectful Hollywood figure that she  
6 could trust. He showed her examples of prior photo shoots on his phone, as well as  
7 photos of his wife and three children in an attempt to build credibility.

8 15. Weinberg told C.D. he had done photo shoots for a lot of Disney stars and  
9 offered her the opportunity to participate in a photo shoot as well.

10 16. When Weinberg followed up with C.D. about the photoshoot via text  
11 message, he told her that she could make money modeling and respectfully discussed  
12 with her the types of photos that she would want to shoot. C.D. emphasized that her  
13 main interest was in candid shots and shots featuring costumes or artistic lighting. She  
14 sent examples of the types of photos she was comfortable with.

15 17. Weinberg assured her that he would only take pictures of her that she felt  
16 proud of, and emphasized that his more provocative photos were what those models  
17 wanted to shoot and not what he was telling them to shoot.

18 18. C.D. told Weinberg she would like to try a photo shoot as long as there  
19 was no erotica. Weinberg booked her for a 12:00 p.m. photo shoot, sent her the shooting  
20 address, and later reminded her of the appointment.

21 19. On February 22, 2019, C.D. arrived at the address Weinberg had given her  
22 for her photo shoot: Weinberg's house in Los Feliz. Once he had lured her to his home,  
23 he disregarded his prior assurances. He led C.D. to his daughter's bedroom and  
24 directed C.D. to take off her shirt and pose on his child's bed. He then "positioned" her  
25 breasts.

26  
27 <sup>1</sup> See, e.g., Brian Wymbs & Christine Gidycz, *Examining Link Between Childhood*  
28 *ADHD and Sexual Assault Victimization*, 11 J. of Attention Disorders 1612 (2020), available  
at <https://pubmed.ncbi.nlm.nih.gov/32468904/>.

1           20.     C.D. responded as many victims of sexual assault respond: she recognized  
2 the situation was odd and unexpected, but avoided making a scene and rationalized to  
3 herself that this was her first photo shoot and Weinberg must know what he was doing  
4 given his experience in Hollywood and as a photographer. C.D. was undergoing a  
5 trauma response where an overload of stress chemicals alters brain functioning:  
6 survival reflexes and passivity habits often take over, and the victim avoids creating a  
7 scene or bruising the sexual offender’s ego in order to ensure survival.<sup>2</sup>

8           21.     When Weinberg took C.D. outside and instructed her to engage in sexual  
9 poses, she attempted to passively diffuse the situation by striking funny poses. But  
10 Weinberg became angry and yelled at her to shut up and do what he instructed. C.D.  
11 complied out of fear of being harmed.

12           22.     Weinberg next positioned C.D. in a hallway, told her to stick her butt out,  
13 and without warning or consent forcefully inserted his fingers into her anus. C.D. went  
14 numb with fear and survived the experience largely by dissociating – a common  
15 response to severe trauma.<sup>3</sup>

16           23.     C.D. again attempted to diffuse the situation without inciting Weinberg’s  
17 anger, telling Weinberg that she was asexual and not interested in sex with him or  
18 anyone else. But Weinberg continued his assault by forcibly performing oral sex on C.D.  
19 and aggressively demanded she perform oral sex on him.

20           24.     After Weinberg had finished assaulting C.D., he stood between her and  
21 the door and demanded assurance that she would not tell the police he had raped her.  
22 C.D. assured Weinberg she would not, and he let her leave.

23           25.     As a result of Weinberg’s assault, C.D. suffered, and continues to suffer,  
24 physical, emotional, and economic injuries.

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26 <sup>2</sup>     Jim Hopper, *Important Things to Get Right About the “Neurobiology of Trauma.” Part*  
27 *2: Victim Responses During Sexual Assault*, 2020 End Violence Against Women Int’l 6,  
28 available at <https://evawintl.org/wp-content/uploads/TB-Trauma-Informed-Combined-1-3.pdf>.

<sup>3</sup> *Id.*

1 **B. Weinberg’s sexual assault of C.D. was part of a pattern of predatory behavior.**

2 26. Weinberg’s sexual assault of C.D. was not an isolated incident and was  
3 not a misunderstanding. Weinberg has recently been publicly exposed as a sexual  
4 predator who has repeatedly lured women to his home with the intent to sexually  
5 assault them.<sup>4</sup>

6 27. On July 14, 2022, authorities arrested Weinberg on multiple allegations of  
7 sexual assault, including rape, between 2012 and 2019.<sup>5</sup> And on October 4, 2022,  
8 authorities arrested Weinberg again, this time for 18 felony counts related to sexual  
9 crimes involving five different victims dating back to 2014.<sup>6</sup> The charges include six  
10 counts of sexual penetration by use of force, four counts of oral copulation, three counts  
11 of forcible rape, two counts of sexual battery by restraint, and one count each of assault  
12 by means of force likely to cause great bodily injury, attempted sexual penetration by  
13 use of force, and false imprisonment by violence.<sup>7</sup>

14 28. Weinberg was previously arrested in 2014 as well, after he allegedly raped  
15 a woman after luring her to his home for a photo shoot, but the L.A. District Attorney’s  
16 office declined to prosecute.<sup>8</sup> Even after a second woman reported sexual misconduct  
17 during a photo shoot with Weinberg later that same year, the District Attorney’s office  
18 still declined to prosecute.<sup>9</sup>

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20 \_\_\_\_\_  
21 <sup>4</sup> Richard Winton, *TV producer Eric Weinberg Arrested, Accused of Sexual Assault on*  
22 *Multiple Women*, L.A. Times, (July 14, 2022, 6:08 PM),  
23 [https://www.latimes.com/california/story/2022-07-14/hollywood-producer-eric-](https://www.latimes.com/california/story/2022-07-14/hollywood-producer-eric-weinberg-maker-of-scrubs-arrested-by-lapd-on-suspicion-of-serial-sexual-assault)  
[weinberg-maker-of-scrubs-arrested-by-lapd-on-suspicion-of-serial-sexual-assault](https://www.latimes.com/california/story/2022-07-14/hollywood-producer-eric-weinberg-maker-of-scrubs-arrested-by-lapd-on-suspicion-of-serial-sexual-assault).

<sup>5</sup> *Id.*

24 <sup>6</sup> Press Release, L.A. Dist. Attorney’s Office, TV Producer Eric Weinberg Charged with  
25 Forcible Rape, Assault (Oct. 5, 2022), [https://da.lacounty.gov/media/news/tv-](https://da.lacounty.gov/media/news/tv-producer-eric-weinberg-charged-forcible-rape-assault)  
[producer-eric-weinberg-charged-forcible-rape-assault](https://da.lacounty.gov/media/news/tv-producer-eric-weinberg-charged-forcible-rape-assault).

26 <sup>7</sup> *Id.*

27 <sup>8</sup> Samuel Braslow, *Is Eric Weinberg Hollywood’s Most Prolific Predator?*, Hollywood Rep.,  
28 (Sept. 1, 2022), [https://www.hollywoodreporter.com/news/general-news/eric-](https://www.hollywoodreporter.com/news/general-news/eric-weinberg-alleged-victims-speak-out-sexual-assault-1235209912/)  
[weinberg-alleged-victims-speak-out-sexual-assault-1235209912/](https://www.hollywoodreporter.com/news/general-news/eric-weinberg-alleged-victims-speak-out-sexual-assault-1235209912/).

<sup>9</sup> *Id.*

1           29.     Since Weinberg's July 2022 arrest, however, prosecutors say dozens more  
2 potential victims have come forward about their encounters with Weinberg.<sup>10</sup> At last  
3 report, the LAPD had received over 70 tips about Weinberg.<sup>11</sup>

4           30.     Weinberg is now being held without bail after Judge Victoria B. Wilson  
5 found that Weinberg “has engaged in a pattern of violence for over six years” and that  
6 “his behavior is predatory.”<sup>12</sup> “[H]e targets women doing everyday things,” lures them  
7 to his home, and once “he gets them into his private nest of his home ... he commits the  
8 sexual assaults.”<sup>13</sup> The allegations against Weinberg indicate that he is a serial rapist,  
9 “that he cannot stop and will not stop his sexual assaults on women; and, therefore, he  
10 poses a danger to the safety of women.”<sup>14</sup>

11           31.     The criminal allegations against Weinberg and accounts from several of  
12 Weinberg’s victims indicate that Weinberg habitually pursued women in everyday  
13 settings, used predatory techniques to gain their trust, and lured them to his property  
14 with the intent to sexually assault them.

15           32.     Plaintiff is informed and believes, and on that basis alleges, that Weinberg  
16 regularly lured and attempted to lure victims by offering women the opportunity to  
17 participate in a photo shoot set up by a Hollywood producer – as he did with C.D. For  
18 example, *The Hollywood Reporter* reports having interviewed more than two dozen  
19 women who say Weinberg approached them in Los Angeles-area parking lots, in  
20 grocery stores, at cafes and on sidewalks, commenting on their appearance before  
21 listing his Hollywood credits and showing them examples of his photography.<sup>15</sup>

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24 \_\_\_\_\_  
<sup>10</sup> Press Release, *supra* note 6.

25 <sup>11</sup> Transcript of Record at 6, *People v. Weinberg*, No. BA509407 (Cal. Super. Ct., Los  
26 Angeles Cnty. Oct. 25, 2022).

27 <sup>12</sup> *Id.* at 18-19, 22.

28 <sup>13</sup> *Id.* at 19.

<sup>14</sup> *Id.* at 19.

<sup>15</sup> Braslow, *supra* note 8.









1 **FOURTH CAUSE OF ACTION**

2 **Gender Violence (Cal. Civ. Code § 52.4)**

3 57. Plaintiff incorporates the allegations contained in the preceding  
4 paragraphs as though fully set forth herein.

5 58. Plaintiff brings this claim for gender violence under California Civil Code  
6 § 52.4 against Weinberg in his individual capacity.

7 59. Under California statute, any person subjected to gender violence may  
8 bring a civil action for damages against a responsible party. Gender violence is a form  
9 of sex discrimination that includes a physical intrusion or invasion of a sexual nature  
10 under coercive conditions.

11 60. Weinberg discriminated against Plaintiff on the basis of her female gender  
12 when he sexually assaulted her, including by touching her breasts, inserting his fingers  
13 into her anus, performing oral sex on her, and demanding her to perform oral sex on  
14 him, all without her consent.

15 61. By subjecting Plaintiff to sexual assault, Weinberg caused her to suffer  
16 physical, mental, and emotional injuries as well as injuries to her personal dignity.

17 62. As a direct, proximate, and foreseeable result of Weinberg's unlawful  
18 conduct, Plaintiff has suffered mental anguish, emotional distress, embarrassment,  
19 anger, and loss of enjoyment of life, and has been injured in mind and body, the precise  
20 amount of which will be proven at trial.

21 63. As a direct, proximate, and foreseeable result of Weinberg's unlawful  
22 conduct, Plaintiff has incurred special and general damages, the precise amount of  
23 which will be proven at trial.

24 64. Weinberg acted maliciously and oppressively. His conduct constitutes  
25 conscious disregard for Plaintiff's rights and safety, entitling her to punitive damages.

26 65. Plaintiff seeks attorneys' fees and costs, as expressly authorized by statute.  
27  
28

1 **FIFTH CAUSE OF ACTION**

2 **Assault**

3 66. Plaintiff incorporates the allegations contained in the preceding  
4 paragraphs as though fully set forth herein.

5 67. Weinberg intended to cause harmful or offensive contact.

6 68. Plaintiff reasonably believed she was about to be touched in a harmful or  
7 offensive manner, or that Weinberg threatened to touch Plaintiff in a harmful or  
8 offensive manner.

9 69. It reasonably appeared to Plaintiff that Weinberg was about to carry out  
10 the threat.

11 70. Plaintiff did not consent to Weinberg's conduct.

12 71. Plaintiff was harmed.

13 72. Weinberg's conduct was a substantial factor in causing her harm.

14 73. As a direct and proximate result of Weinberg's conduct, Plaintiff has  
15 suffered injuries, damages, and losses – including, without limitation, severe emotional  
16 distress, humiliation, economic loss, and other consequential damages.

17 74. Weinberg's behavior as alleged herein was willful, wanton, and malicious,  
18 and was intended to oppress and cause injury to Plaintiff, entitling Plaintiff to an award  
19 of punitive damages.

20 **SIXTH CAUSE OF ACTION**

21 **Battery**

22 75. Plaintiff incorporates the allegations contained in the preceding  
23 paragraphs as though fully set forth herein.

24 76. Weinberg touched Plaintiff with the intent to harm or offend her,  
25 including by touching her breasts, inserting his fingers into her anus, performing oral  
26 sex on her, and demanding her to perform oral sex on him, all without her consent.

27 77. Plaintiff did not consent to any of this touching.

28 78. Plaintiff was harmed or offended by Weinberg's conduct.







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1 **JURY DEMAND**

2 Plaintiff demands a trial by jury for all issues so triable under the law.

3  
4 November 7, 2022

Respectfully submitted,

5  
6 By: /s/ [Signer name]

7  
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