

CONFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

NOV 22 2010

John A. Clarke, Executive Officer/Clerk

By Jennifer Denham, Deputy

MARTIN D. SINGER (BAR NO. 78166)
MICHAEL D. HOLTZ (BAR NO. 149616)
LAVELY & SINGER
PROFESSIONAL CORPORATION
2049 Century Park East, Suite 2400
Los Angeles, California 90067-2906
Telephone: [REDACTED]
Facsimile: [REDACTED]

Attorneys for Plaintiff
CHARLIE SHEEN

CASE MANAGEMENT CONFERENCE

MAR 14 2011

Date

8:30am

DEPT. B

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - WEST DISTRICT

CHARLIE SHEEN, an individual,

Plaintiff,

v.

CHRISTINA WALSH p/k/a CAPRI
ANDERSON, an individual; and DOES 1
through 20, inclusive,

Defendants.

CASE NO. SC110459

COMPLAINT FOR:

Norman P. Tarte

- (1) CIVIL EXTORTION
- (2) CONVERSION
- (3) PRIMA FACIE TORT

DEMAND FOR JURY TRIAL

Plaintiff CHARLIE SHEEN alleges as follows:

INTRODUCTION

1. This case involves an attempted shakedown and extortion of the internationally known actor and celebrity Charlie Sheen ("Sheen") by an opportunistic pornographic film star and publicity hungry scam-artist named Christina Walsh p/k/a Capri Anderson ("Walsh"). After a consensual encounter with Sheen in the Plaza Hotel in New York City on the evening of October 25, 2010, Walsh decided that this was her chance to become rich and famous. To that end, she fabricated a sensational tale about being assaulted, battered and held against her will, and used that fictional story as a basis for an extortion plot against Sheen, threatening that if he did not pay her

1 at least One Million Dollars, she would (i) go to the Aspen District Attorney with her false
2 allegations, and (ii) seek to embarrass him and attempt to damage his career by going to the media
3 with her false tale. When Sheen refused to succumb to Walsh's extortionate and illegal demands,
4 Walsh's representatives contacted the Aspen District Attorney (who declined to do anything), and
5 Walsh and her attorney solicited the highest bid they could get from network media, ultimately
6 giving an exclusive interview to *Good Morning America* on November 22, 2010 in which Walsh
7 repeated her fictitious saga about the alleged events of October 25, 2010.

8 2. Prior to going public with her fabricated tale, Walsh admitted to several third
9 parties that she was not assaulted, battered or held against her will by Sheen. Similarly, Walsh
10 told New York City police that she was not injured and that Sheen acted "like a total gentleman."
11 Indeed, immediately after the alleged incident, Walsh posted on her porn website that she was
12 "fine" and that if you wanted to see more of her, for a price, one could enter the website. Even
13 after unsuccessfully attempting to have the Aspen District Attorney take action against Sheen based
14 on her fabricated lies, Walsh continued to try to extort Sheen, threatening that if he did not pay
15 her \$500,000, she would go public with her false story. Through this action, Sheen intends to
16 expose Walsh for the fraud that she is, and to seek redress for her unlawful attempt to extort an
17 exorbitant sum of money from him based on sheer lies and deceit.

18 19 THE PARTIES

20 3. Plaintiff Charlie Sheen ("Sheen") is, and at all times relevant hereto has been, a
21 resident of the County of Los Angeles, State of California. Sheen is an internationally known
22 actor and celebrity, and is the star of the hit television comedy "Two and Half Men." It has been
23 widely reported in the media that Sheen is the highest paid actor on television, a fact that Sheen
24 is informed and believes and based thereon alleges was well-known by defendant Christina Walsh
25 and her attorney.

26 4. Plaintiff is informed and believes and based thereon alleges that Defendant Christina
27 Walsh p/k/a Capri Anderson ("Walsh") is an individual who, at varying times during the past
28 several years, has resided in the County of Los Angeles, State of California.

5. Plaintiff is informed and believes and based thereon alleges that pursuant to California Code of Civil Procedure section 474, the fictitiously named Defendants sued herein as Does 1 through 20, inclusive (the “Doe Defendants”), and each of them, were in some manner responsible or legally liable for the actions, events, transactions and circumstances alleged herein. The true names and capacities of such fictitiously named defendants, whether individual, corporate, associate or otherwise, are presently unknown to Plaintiff and Plaintiff will seek leave of Court to amend this Complaint to assert the true names and capacities of such fictitiously named Doe Defendants when the same have been ascertained. For convenience, each reference to a named defendant herein shall also refer to the Doe Defendants and each of them. For convenience, Walsh and the Doe Defendants are sometimes collectively referred to herein as the “Defendants.”

6. Plaintiff is informed and believes and based thereon alleges that Defendants, and each of them, were the agents, employees, partners, joint-venturers, co-conspirators, owners, principals, and employers of the remaining Defendants, and each of them, and are, and at all times herein mentioned were, acting within the course and scope of that agency, partnership, employment, conspiracy, ownership, or joint venture. Plaintiff is further informed and believes and based thereon alleges that the acts and conduct herein alleged of each such Defendant were known to, authorized by, and/or ratified by the other Defendants, and each of them.

FACTUAL BACKGROUND

7. Walsh and her representative know that she has no legal right to any monies from Sheen, and that their ever-changing salacious allegations are false and wholly fabricated for the sole purpose of extorting Sheen.

8. Plaintiff is informed and believes and based thereon alleges that Walsh, a young and relatively unknown pornographic film actor who has barely made ends meet by appearing in various XXX-rated films over the past several years, has an unrelenting desire and goal to be wealthy and to appear on television and achieve her fifteen-minutes of fame. Though Walsh was working in the pornographic film industry in Los Angeles the past several years, Plaintiff is

1 informed and believes and based thereon alleges that Walsh had fallen on hard financial times and
2 recently started earning money as an escort and a prostitute in New York (where she was raised).

3 9. On the evening of October 25, 2010, Sheen and Walsh met at a bar at the Plaza
4 Hotel, and ended up going out to dinner with a group of people in New York City. Thereafter,
5 Sheen and Walsh went back to Sheen's room at the Plaza Hotel. Shortly after they had gotten into
6 the room, Sheen discovered that a very expensive Patek Philippe watch which he had purchased
7 in May 2010 for \$165,000 was missing. Sheen asked Walsh to return the watch, and when Walsh
8 refused and falsely denied that she had taken the watch, Sheen became extremely upset. Walsh
9 then locked herself in the bathroom of the hotel room and refused to come out. At no time did
10 Sheen assault, batter or threaten Walsh. Nor did Sheen hold Walsh against her will. Walsh was
11 the one who locked herself in the bathroom and refused to come out, apparently because she was
12 afraid that Sheen might find the watch on her.

13 10. After Walsh locked herself in the bathroom, hotel security and the New York City
14 police were called to the room. Plaintiff is informed and believes and based thereon alleges that
15 when the hotel security and the police arrived, Walsh confirmed to them that she was not injured,
16 and that she had not been assaulted, battered or held against her will. Plaintiff is further informed
17 and believes and based thereon alleges that Walsh told the police that Sheen acted like a total
18 gentleman. Plaintiff is further informed and believes and based thereon alleges that Walsh left the
19 hotel that evening on her own, and did not go to the hospital or seek medical treatment for any
20 alleged injuries that evening or at any time thereafter.

21 22 THE EXTORTIONATE PLOT

23 10. Notwithstanding that Walsh confirmed to hotel security and to the police that she
24 was not injured, and that she had not been assaulted, battered or held against her will, Plaintiff is
25 informed and believes and based thereon alleges that Walsh promptly retained an attorney in Los
26 Angeles the very next day and decided this was her opportunity to cash in. Walsh and her attorney
27 concocted alleged details from the night before that were woven from whole cloth, with the
28

1 specific design and intent of using the fabricated details to try to shake down Sheen for at least a
2 million dollars.

3 11. At or about this time (i.e., within 24 hours of the alleged incident at the Plaza
4 Hotel), Plaintiff is informed and believes and based thereon alleges that Walsh confided to several
5 people that she was not injured, and that she had not been assaulted, battered or held against her
6 will, but that if Sheen did not pay her a large sum of money, she was going to fabricate that she
7 had been threatened and physically abused by Sheen. Walsh also admitted to several people that
8 she had in fact stolen a very expensive watch from Sheen, and that she had given the watch to a
9 friend to hold.

10 12. On Thursday, October 28, 2010, Walsh's lawyer contacted Sheen's counsel and
11 said he needed to discuss an "urgent" matter. Sheen's counsel called Walsh's lawyer, and during
12 the conversation Walsh's lawyer said that Walsh was getting ready to go to Colorado on Monday
13 (November 1, 2010) and to go on one of the morning talk shows the week of November 1 unless
14 Sheen paid her a seven figure sum (i.e., at least \$1,000,000). When asked why she would be
15 going to Colorado, Walsh's attorney stated that Walsh intended to tell the District Attorney in
16 Aspen, Colorado that her life was threatened and that she was assaulted and held against her will
17 by Sheen, and that such (fabricated) information might cause Sheen's probation to be revoked.
18 When asked why she would go on a morning talk show, Walsh's attorney said she was being
19 offered \$100,000 to talk publicly about the incident, and Walsh's intention was to divulge (false
20 and fabricated) details about the alleged threats on her life and assault, battery and false
21 imprisonment she endured. Walsh's attorney said several times during the conversation that
22 Walsh could be persuaded not go to Colorado and not to go on television and discuss the conduct
23 allegedly engaged in by Sheen, but only for a significant seven figure sum and only if the sum was
24 confirmed immediately.

25 13. Sheen refused to pay any sum in response to the extortionate threat, let alone a
26 seven figure sum. As a result, Plaintiff is informed and believes and based thereon alleges that
27 Walsh through her representatives did in fact contact the District Attorney in Aspen, Colorado and
28 relayed her fabricated allegations about what allegedly occurred at the Plaza Hotel on October 25,

1 2010. Plaintiff is informed and believes and based thereon alleges that the Aspen, Colorado
2 authorities declined to take any action based on Walsh's (false) allegations. Nor did the New York
3 City police press charges against Sheen, because Sheen did nothing unlawful to Walsh, as Walsh
4 herself confirmed to the police when they showed up at the Plaza Hotel that evening. In fact,
5 Plaintiff is informed and believes and based thereon alleges that Walsh told the New York City
6 police that Sheen "acted like a total gentleman."

7 14. Still undeterred in her effort to extort money from Sheen, on November 19, 2010
8 Walsh's attorney again contacted Sheen's counsel. This time Walsh's attorney stated that he and
9 Walsh were going in front of the cameras to give an interview to *Good Morning America* the very
10 next day (November 20) at 2:00 pm eastern time, and that they were going to (falsely) state that
11 Walsh was assaulted, battered and held against her will by Sheen. Walsh's attorney said that
12 Walsh would agree not to go on camera with *Good Morning America*, and would agree not to give
13 other interviews to the media throughout the world, if she was paid \$500,000.

14 15. Once again, Sheen refused to give in to the extortionate demand. As a result,
15 Plaintiff is informed and believes and based thereon alleges that Walsh and her attorney gave an
16 interview to *Good Morning America* on November 20, 2010 (to be aired during the week of
17 November 22, 2010) in which Walsh repeated her false, fabricated and fictitious statements
18 regarding the alleged events of October 25, knowing that said falsehoods would be aired on
19 national television to millions of viewers and picked up by media outlets throughout the country
20 and the world.

21
22 **FIRST CAUSE OF ACTION**

23 **CIVIL EXTORTION**

24 **(AGAINST ALL DEFENDANTS)**

25 16. Plaintiff repeats, realleges, adopts and incorporates each and every allegation
26 contained in Paragraphs 1 through 15, inclusive, as though fully set forth herein.

27 17. Among other things, Walsh threatened Sheen for the purpose of instilling in him
28 a fear that he would suffer embarrassment and humiliation, and would be disgraced and exposed

1 to various kinds of opprobrium and harm, unless Sheen capitulated to Walsh's extortionate
2 demands. By undertaking the wrongful acts alleged herein, including but not limited to Walsh's
3 threats that she would go to the Colorado authorities, file a lawsuit against Sheen asserting false
4 and fabricated legal claims, and smear Sheen in the media unless he paid at least One Million
5 Dollars, Defendants have committed extortion in violation of California law. Defendants'
6 intentional infliction of harm upon Plaintiff through their extortionate misconduct alleged
7 hereinabove was and is tortious, as well as unlawful.

8 18. Plaintiff is informed and believes and based thereon alleges that at all material
9 times, Defendants had the specific intent to extort money from Plaintiff, and that at all material
10 times, the conduct alleged herein by Defendants was engaged in for the purpose of inducing
11 Plaintiff to provide Defendants with money and other consideration. Defendants' conduct as
12 alleged herein was unprivileged and illegal, was not constitutionally protected activity, and was
13 unprotected by constitutional guarantees of free speech.

14 19. Plaintiff refused to be the victim of Defendants' extortionate demands which sought
15 at least One Million Dollars, and would prefer to litigate the case on the merits, rather than be held
16 hostage by Defendants' false accusations and unlawful threats.

17 20. As a direct and proximate result of Defendants' extortionate and despicable conduct
18 as alleged herein, Plaintiff has been damaged in an amount in excess of the minimum jurisdictional
19 limits of this Court, the exact amount subject to proof at the time of trial.

20 21. Plaintiff is informed and believes and based thereon alleges that Defendants did not
21 act out of any sincere or proper motive, but engaged in a deliberate tortious and unlawful scheme
22 to extort money from Plaintiffs, threatening to make their false claims public to seek to harm and
23 ruin Plaintiff unless Defendants were paid off. Even after Plaintiff refused to adhere to their
24 extortionate demands, Defendants continued to advance their extortionate threats and conduct.
25 Plaintiff is informed and believes and based thereon alleges that the aforementioned acts of
26 Defendants were done intentionally and with a conscious and deliberate disregard for Plaintiff's
27 rights and interests, with full knowledge of the adverse effect of their actions on Plaintiff, and with
28 the intent to vex and injure Plaintiff, such as to constitute oppression, fraud, or malice, thus

1 warranting the imposition of punitive damages in an amount appropriate to punish or set an
2 example of Defendants, and to deter such conduct in the future, the exact amount of such damages
3 subject to proof at the time of trial.

4
5 **SECOND CAUSE OF ACTION**

6 **CONVERSION**

7 **(AGAINST ALL DEFENDANTS)**

8 22. Plaintiff repeats, realleges, adopts and incorporates each and every allegation
9 contained in paragraphs 1 through 15, and 17 through 19, inclusive, as though fully set forth
10 herein.

11 23. Plaintiff is informed and believes and based thereon alleges that while Defendant
12 was in Plaintiff's hotel room at the Plaza Hotel on the evening of October 25, 2010, Defendant
13 misappropriated and stole Plaintiff's rare Patek Philippe watch, which Plaintiff purchased in May
14 2010, and which has a value of \$165,000.

15 24. Plaintiff is further informed and believes and based thereon alleges that within the
16 few days following the evening of October 25, Defendant admitted to several people that she had
17 in fact taken Plaintiff's watch, and that she had given it to a close friend to hold.

18 25. Defendant's actions in taking Plaintiff's watch without his knowledge or consent
19 constitute conversion.

20 26. As direct and proximate result of the Defendant's conversion as alleged herein,
21 Plaintiff has suffered damages in an amount of no less than \$165,000, subject to proof at the time
22 of trial.

23 27. Plaintiff is informed and believes and based thereon alleges that the aforementioned
24 acts of Defendant were done intentionally and with a conscious and deliberate disregard for
25 Plaintiff's rights and interests, with full knowledge of the adverse effect of their actions on
26 Plaintiff, and with the intent to vex and injure Plaintiff, such as to constitute oppression, fraud,
27 or malice, thus warranting the imposition of punitive damages in an amount appropriate to punish
28

1 or set an example of Defendant, and to deter such conduct in the future, the exact amount of such
2 damages subject to proof at the time of trial.

3
4 **THIRD CAUSE OF ACTION**

5 **PRIMA FACIE TORT**

6 **(AGAINST ALL DEFENDANTS)**

7 28. Plaintiff repeats, realleges, adopts and incorporates each and every allegation
8 contained in paragraphs 1 through 15, 17 through 19, and 23 through 25, inclusive, as though
9 fully set forth herein.

10 29. By engaging in the acts and omissions pled herein, Defendants have engaged in a
11 prima facie tort in that each have together and/or individually intentionally caused injury to
12 Plaintiff, and the conduct is generally culpable and not justifiable under the circumstances.

13 30. As an actual, direct, proximate and/or legal result of the acts and omissions of
14 Defendants, Plaintiff has suffered damages in an amount in excess of the minimum jurisdictional
15 limits of this Court, the exact amount subject to proof at the time of trial.

16 31. Plaintiff is informed and believes and based thereon alleges that the aforementioned
17 acts of Defendants were done intentionally and with a conscious and deliberate disregard for
18 Plaintiff's rights and interests, with full knowledge of the adverse effect of their actions on
19 Plaintiff, and with the intent to vex and injure Plaintiff, such as to constitute oppression, fraud,
20 or malice, thus warranting the imposition of punitive damages in an amount appropriate to punish
21 or set an example of Defendants, and to deter such conduct in the future, the exact amount of such
22 damages subject to proof at the time of trial.

23
24 **PRAYER**

25 WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

26 **AS TO THE FIRST CAUSE OF ACTION:**

27 1. For general and special damages in an amount in excess of the minimum
28 jurisdictional limits of this Court, the exact amount subject to proof at the time of trial;

2. For exemplary and punitive damages against Defendant in an amount sufficient to punish and deter Defendant, the exact sum subject to proof at the time of trial;

AS TO THE SECOND CAUSE OF ACTION:

3. For compensatory damages in an amount of no less than \$165,000, subject to proof at the time of trial;

4. For exemplary and punitive damages against Defendant in an amount sufficient to punish and deter Defendant, the exact sum subject to proof at the time of trial;

AS TO THE THIRD CAUSE OF ACTION:

5. For compensatory damages in an amount in excess of the minimum jurisdictional limits of this Court, the exact amount subject to proof at the time of trial;

6. For exemplary and punitive damages against Defendant in an amount sufficient to punish and deter Defendant, the exact sum subject to proof at the time of trial;

AS TO ALL CAUSES OF ACTION:

7. For all costs of suit as permitted by law;

8. For reasonable attorneys' fees incurred herein by Plaintiff as permitted by law;

9. For interest as may be provided by law; and

10. For such other and further relief as the Court deems just and proper.

DATE: November 22, 2010

LAVELY & SINGER
PROFESSIONAL CORPORATION
MARTIN D. SINGER
MICHAEL D. HOLTZ

By: 

MARTIN D. SINGER

Attorneys for Plaintiff
CHARLIE SHEEN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JURY DEMAND

Plaintiff CHARLIE SHEEN hereby demands a trial by jury in this matter.

DATE: November 22, 2010

LAVELY & SINGER
PROFESSIONAL CORPORATION
MARTIN D. SINGER
MICHAEL D. HOLTZ

By: 

MARTIN D. SINGER
Attorneys for Plaintiff
CHARLIE SHEEN