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SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

CESAR SANCHEZ-GUZMAN,

Plaintiff,

v.

BRYAN SINGER,

Defendant.

NO.

COMPLAINT FOR DAMAGES

Plaintiff CESAR SANCHEZ-GUZMAN, by and through his attorneys, hereby states and alleges as follows:

I. INTRODUCTION

1.1. This claim arises from childhood sexual abuse that Plaintiff Cesar Sanchez-Guzman suffered at the hands of Bryan Singer.

1.2. When Plaintiff Cesar Sanchez-Guzman was 17 years old, he was sexually assaulted by Bryan Singer on a yacht.

1.3. In about 2003, Cesar was invited to a party on a yacht owned by Lester Waters. At the party, he met Defendant Bryan Singer, who offered to give Cesar a tour of the yacht. During this tour, Bryan Singer lured Cesar into a room, shut the door and demanded that Cesar

1 perform oral sex. When Plaintiff refused, Bryan Singer forced him into acts of oral and anal
2 sex.

3 **II. PARTIES**

4
5 2.1 Plaintiff Cesar Sanchez-Guzman (hereinafter “Cesar” or “Plaintiff”) is a man
6 who resides in King County, Washington. When he was a minor, Plaintiff was sexually
7 assaulted by Bryan Singer.

8 2.2 Defendant Bryan Singer is a citizen and resident of the State of California.

9 **III. JURISDICTION AND VENUE**

10 3.1 The events giving rise to the claims set forth herein occurred in King County,
11 Washington.

12 3.2 As such, this Court has jurisdiction over this matter pursuant to RCW 2.08.010,
13 and venue is proper in this Court pursuant to RCW 4.12.020.

14 **IV. STATEMENT OF FACTS**

15 4.1 In or about the Summer of 2003, Cesar attended a party hosted by Lester Waters
16 on a yacht owned by Mr. Waters. Upon information and belief, Mr. Waters was a wealthy tech
17 investor who frequently hosted parties for young gay males in the Seattle area.

18 4.2 Patrons at the yacht party included several gay males as well as Mr. Waters,
19 Bryan Singer, and other adult friends of Mr. Waters. Cesar was 17 years old at the time. The
20 yacht sailed in Lake Union and Lake Washington and alcohol was served.

21 4.3 At one point during the party, Bryan Singer introduced himself to Cesar and
22 offered to give Cesar a tour of the yacht. At the time, Cesar did not know who Bryan Singer
23 was other than that his name was Bryan and that he was a friend of Mr. Waters.
24

1 4.4 Bryan Singer led Cesar through the master bedroom of the yacht to a small
2 corridor that led to another small room. Bryan Singer instructed Cesar to walk into the small
3 room. Cesar walked into the room as Bryan Singer followed him and closed the door.

4 4.5 At that time, Bryan Singer approached Cesar and thrust his body on him. Bryan
5 Singer then forced Cesar to the floor, shoved Cesar's face against his crotch area and demanded
6 Cesar perform oral sex on him. Bryan Singer pulled out his penis, smacked Cesar in the face
7 with it and forced it into Cesar's mouth. Cesar pleaded with him to stop, however he continued
8 to force Cesar to perform oral sex, causing Cesar to choke.

9 4.6 Bryan Singer threw Cesar onto the bed, pulled down Cesar's pants and
10 performed oral sex on Cesar. Cesar pleaded for him to stop.

11 4.7 Bryan Singer then forcibly anally penetrated Cesar. Cesar pleaded for him to
12 stop.

13 4.8 Later, Bryan Singer approached Cesar and told him that he was a producer in
14 Hollywood and that he could help Cesar get into acting as long as Cesar never said anything
15 about the incident. He then told Cesar that no one would believe him if he ever reported the
16 incident, and that he could hire people who are capable of ruining someone's reputation.

17 4.9 The sexual abuse has caused Cesar to experience severe psychological, mental
18 and emotional injuries, shame, humiliation and loss of enjoyment of life. These injuries are
19 persistent, permanent and debilitating in nature. Cesar did not discover the causal connection
20 between the sexual assault and his injuries for which this claim is brought.

21 4.10 As a result of the misconduct and unlawful acts described herein, Plaintiff has
22 suffered, and continues to suffer, general and special damages. These damages include, but are
23 not limited to, emotional distress, mental anguish, physical and mental pain and suffering, a
24

1 decrease in his ability to enjoy life, past and future medical expenses, attorneys' fees and costs,
2 and other general and special damages, all in an amount to be determined at trial.

3
4 **V. CAUSES OF ACTION**

5 **A. SEXUAL ASSAULT AND BATTERY**

6 5.1 Plaintiff re-alleges the paragraphs set forth above and below.

7 5.2 Defendant Bryan Singer intentionally engaged in harmful and offensive contact
8 with Plaintiff while Plaintiff was a minor. This contact included sexual assault.

9 5.3 As a direct and proximate result of that intentional harmful and offensive
10 contact, Plaintiff suffered general and special damages.

11 **B. OUTRAGE/INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

12 5.4 Plaintiff re-alleges the paragraphs set forth above and below.

13 5.5 Defendant Bryan Singer engaged in extreme and outrageous conduct by sexually
14 abusing and exploiting Plaintiff.

15 5.6 Defendant Bryan Singer knew that his extreme and outrageous conduct would
16 irreparably and severely harm Plaintiff, or he recklessly disregarded the same.

17 5.7 As a direct and proximate result of defendant Bryan Singer's extreme and
18 outrageous conduct, Plaintiff suffered and continues to suffer irreparable, severe emotional
19 distress and other general and special damages.

20 **C. SEXUAL EXPLOITATION OF CHILDREN**

21 5.8 Plaintiff re-alleges the paragraphs set forth above and below.

22 5.9 Defendant Bryan Singer violated the Sexual Exploitation of Children Act, RCW
23 9.68A. *et al.*, by sexual abusing and exploiting Plaintiff. This includes, but is not limited to,
24 violations of RCW 9 .68A.040, which prohibited sexual exploitation of Plaintiff while he was

1 a minor, and, RCW 9 .68A.090, which prohibited communication with Plaintiff for immoral
2 purposes while he was a minor.

3 5.10 Under RCW 9.68A.130, Plaintiff is entitled to his attorneys' fees and costs for
4 pursuing this civil action.
5

6 **VI. PRAYER FOR RELIEF**

7 Plaintiff prays for judgment against the Defendant for general and special damages in
8 an amount to be proven at the time of trial, and for such other and further relief as the Court
9 deems just and equitable.

10 Plaintiff specifically reserves the right to pursue additional causes of action that are
11 supported by the facts pleaded herein or that may be supported by other facts that emerge during
12 discovery.

13 DATED this 7th day of December, 2017.

14
15 PFAU COCHRAN VERTETIS AMALA PLLC

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