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**FILED**  
LOS ANGELES SUPERIOR COURT

SEP 14 1993  
EDWARD M. KRIZMAN  
CLERK  
DEPUTY

Attorneys for Plaintiff J. CHANDLER, a minor, through his  
Guardians Ad Litem E. Chandler and J. Chandler

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

SC026226

11 J. CHANDLER, a minor, by and )  
12 through his Guardians Ad Litem )  
13 E. Chandler and J. Chandler, )

14 Plaintiff, )

15 vs. )

16 MICHAEL JACKSON and DOES 1 )  
17 through 100, )

18 Defendants. )

CASE NO.

COMPLAINT FOR SEXUAL BATTERY;  
BATTERY; SEDUCTION; WILLFUL  
MISCONDUCT; INTENTIONAL  
INFLICTION OF EMOTIONAL  
DISTRESS; FRAUD AND NEGLIGENCE

19  
20 Plaintiff J. Chandler, a minor, by and through his Guardians  
21 Ad Litem E. Chandler and J. Chandler for causes of action,  
22 alleges:

23  
24 FIRST CAUSE OF ACTION

25 (By Plaintiff Against All Defendants for  
26 Sexual Battery)

27  
28 1. The true names or capacities of defendants named herein

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SANTA MONICA DISTRICT  
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SEP 14 1993 10:42  
REG OF ACT A  
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as Does 1 through 100, and each of them, are unknown to plaintiff who therefore sues said defendants by such fictitious names. Plaintiff will amend this complaint and show such true names and capacities when the same have been ascertained. Each of the defendants named herein as a Doe is legally responsible for the events and happenings herein described and for the damages proximately caused thereby.

2. Prior to the commencement of this action E. Chandler and J. Chandler were appointed Guardian and Litem of their son, plaintiff J. Chandler, for the purpose of maintaining this lawsuit.

3. Plaintiff is a male child who is 13 years old.

4. In or around 1993 defendant Michael Jackson repeatedly committed sexual battery upon plaintiff in the County of Los Angeles, State of California and in other locations both within and without the State of California as more fully described in paragraphs 5 through 7, below.

5. Defendant Michael Jackson, with the intent to cause a harmful or offensive contact with an intimate part of plaintiff, repeatedly committed sexual battery upon plaintiff by having sexually offensive contacts with plaintiff. These sexually offensive contacts include but are not limited to defendant Michael Jackson orally copulating plaintiff, defendant Michael Jackson masturbating plaintiff, defendant Michael Jackson eating the semen of plaintiff, and defendant Michael Jackson having plaintiff fondle and manipulate the breasts and nipples of defendant Michael Jackson while defendant Michael Jackson would masturbate.

1           6. Defendant Michael Jackson, with the intent to cause a  
2 harmful or offensive contact with plaintiff by the use of one or  
3 more intimate parts of said defendant, repeatedly committed  
4 sexually battery upon plaintiff by having sexually offensive  
5 contacts with plaintiff.

6           7. Defendant Michael Jackson repeatedly committed sexual  
7 battery upon plaintiff by acts which caused plaintiff to have an  
8 imminent apprehension of the conduct described in paragraphs 5  
9 and 6 above, which resulted in sexually offensive contacts with  
10 plaintiff.

11           8. As a direct and proximate result of the repeated sexual  
12 batteries committed by the defendant Michael Jackson upon the  
13 plaintiff, the plaintiff has suffered injury to his health,  
14 strength and activity, injury to his body and shock and injury to  
15 his nervous system, all of which injuries have caused and  
16 continue to cause plaintiff great mental, physical and nervous  
17 pain and suffering and emotional distress, all to plaintiff's  
18 damage in an amount in excess of the minimum jurisdictional  
19 amount of the Superior Court.

20           9. As a further, direct and proximate result of the  
21 repeated sexual batteries of defendant Michael Jackson upon the  
22 plaintiff, the plaintiff was required to and did and will be  
23 required to employ health care professionals to examine, treat  
24 and care for plaintiff and has and will incur medical and  
25 incidental expenses. The exact amount of such expense is unknown  
26 to plaintiff at this time and plaintiff will ask leave to amend  
27 this pleading to set forth the exact amount thereof when the same  
28 is ascertained by plaintiff, or plaintiff will offer proof

1 thereof at the time of trial.

2 10. Defendant Michael Jackson by repeatedly committing  
3 sexual batteries upon plaintiff has been guilty of oppression,  
4 fraud and malice; has engaged in conduct which is intended by  
5 said defendant to cause injury to the plaintiff; has engaged in  
6 conduct which is despicable conduct carried on by said defendant  
7 with the willful and conscious disregard of the rights or safety  
8 of plaintiff; has engaged in despicable conduct that subjects  
9 plaintiff to cruel and unjust hardship in disregard of  
10 plaintiff's rights; and has used intentional misrepresentation,  
11 deceit and concealment of material facts known to said defendant  
12 with the intention of depriving plaintiff of his legal rights and  
13 otherwise causing injury to plaintiff, thereby entitling  
14 plaintiff to an award of exemplary and punitive damages in an  
15 amount to be determined at the trial.

16  
17 SECOND CAUSE OF ACTION

18 (By Plaintiff Against All Defendants for Battery)

19  
20 11. Plaintiff repeats and incorporates herein by reference  
21 each and every allegation contained in paragraphs 1, 2 and 3,  
22 above.

23 12. In or around 1993, defendant Michael Jackson repeatedly  
24 committed battery upon plaintiff in the County of Los Angeles,  
25 State of California, and in other locations both within and  
26 without the State of California as more fully described in  
27 paragraph 13 below.

28 13. Defendant Michael Jackson repeatedly committed battery

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1 upon plaintiff by engaging in harmful contact with plaintiff  
2 including but not limited to harmful sexual contact with  
3 plaintiff. These harmful contacts include but are not limited to  
4 defendant Michael Jackson orally copulating plaintiff, defendant  
5 Michael Jackson masturbating plaintiff, defendant Michael Jackson  
6 eating the semen of plaintiff, and defendant Michael Jackson  
7 having plaintiff fondle and manipulate the breasts and nipples of  
8 defendant Michael Jackson while defendant Michael Jackson would  
9 masturbate.

10 14. As a direct and proximate result of the repeated  
11 batteries committed by the defendant Michael Jackson upon the  
12 plaintiff, the plaintiff has suffered injury to his health,  
13 strength and activity, injury to his body and shock and injury to  
14 his nervous system, all of which injuries have caused and  
15 continue to cause plaintiff great mental, physical and nervous  
16 pain and suffering and emotional distress, all to plaintiff's  
17 damage in an amount in excess of the minimum jurisdictional  
18 amount of the Superior Court.

19 15. As a further, direct and proximate result of the  
20 repeated batteries of defendant Michael Jackson upon the  
21 plaintiff, the plaintiff was required to and did and will be  
22 required to employ health care professionals to examine, treat  
23 and care for plaintiff and has and will incur medical and  
24 incidental expenses. The exact amount of such expense is unknown  
25 to plaintiff at this time and plaintiff will ask leave to amend  
26 this pleading to set forth the exact amount thereof when the same  
27 is ascertained by plaintiff, or plaintiff will offer proof  
28 thereof at the time of trial.

1           16. Defendant Michael Jackson by repeatedly committing  
2 batteries upon plaintiff has been guilty of oppression, fraud and  
3 malice; has engaged in conduct which is intended by said  
4 defendant to cause injury to the plaintiff; has engaged in  
5 conduct which is despicable conduct carried on by said defendant  
6 with the willful and conscious disregard of the rights or safety  
7 of plaintiff; has engaged in despicable conduct that subjects  
8 plaintiff to cruel and unjust hardship in disregard of  
9 plaintiff's rights; and has used intentional misrepresentation,  
10 deceit and concealment of material facts known to said defendant  
11 with the intention of depriving plaintiff of his legal rights and  
12 otherwise causing injury to plaintiff, thereby entitling  
13 plaintiff to an award of exemplary and punitive damages in an  
14 amount to be determined at the trial.

15  
16                                   THIRD CAUSE OF ACTION

17                   (By Plaintiff Against All Defendants for Seduction)

18  
19           17. Plaintiff repeats and incorporates herein by reference  
20 each and every allegation contained in paragraphs 1, 2 and 3,  
21 above.

22           18. Defendant Michael Jackson gave expensive and lavish  
23 gifts to plaintiff; showered plaintiff with care and attention;  
24 took plaintiff on trips and vacations; feigned despair and grief  
25 when plaintiff rejected said defendant's sexual advances; and  
26 falsely told plaintiff that it would be right and appropriate for  
27 plaintiff to comply with said defendant's sexual advances. Said  
28 defendant's actions were done for the sole and exclusive purpose



1 of forcing plaintiff to comply with said defendant's sexual  
2 demands and other demands so that said defendant could satisfy  
3 his lust, passions and sexual desires.

4 19. As a result of the foregoing, defendant Michael Jackson  
5 was able to seduce plaintiff and thereby defendant Michael  
6 Jackson was able to satisfy his lust, passions and sexual  
7 desires. The sexual acts committed by defendant Michael Jackson  
8 in his seduction of plaintiff include but are not limited to  
9 defendant Michael Jackson orally copulating plaintiff, defendant  
10 Michael Jackson masturbating plaintiff, defendant Michael Jackson  
11 eating the semen of plaintiff, and defendant Michael Jackson  
12 having plaintiff fondle and manipulate the breasts and nipples of  
13 defendant Michael Jackson while defendant Michael Jackson would  
14 masturbate.

15 20. As a direct and proximate result of the seduction of  
16 plaintiff by the defendant Michael Jackson, the plaintiff has  
17 suffered injury to his health, strength and activity, injury to  
18 his body and shock and injury to his nervous system, all of which  
19 injuries have caused and continue to cause plaintiff great  
20 mental, physical and nervous pain and suffering and emotional  
21 distress, all to plaintiff's damages in an amount in excess of  
22 the minimum jurisdictional limit of the Superior Court.

23 21. As a further, direct and proximate result of the  
24 seduction of plaintiff by the defendant Michael Jackson, the  
25 plaintiff was required to and did and will be required to employ  
26 health care professionals to examine, treat and care for  
27 plaintiff and has and will incur medical and incidental expenses.  
28 The exact amount of such expense is unknown to plaintiff at this

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time and plaintiff will ask leave to amend this pleading to set forth the exact amount thereof when the same is ascertained by plaintiff, or plaintiff will offer proof thereof at the time of trial.

22. Defendant Michael Jackson, by seducing plaintiff, has been guilty of oppression, fraud and malice; has engaged in conduct which is intended by said defendant to cause injury to the plaintiff; has engaged in conduct which is despicable conduct carried on by said defendant with the willful and conscious disregard of the rights or safety of plaintiff; has engaged in despicable conduct that subjects plaintiff to cruel and unjust hardship in disregard of plaintiff's rights; and has used intentional misrepresentation, deceit and concealment of material facts known to said defendant with the intention of depriving plaintiff of his legal rights and otherwise causing injury to plaintiff, thereby entitling plaintiff to an award of exemplary and punitive damages in an amount to be determined at the trial.

FOURTH CAUSE OF ACTION

(By Plaintiff Against All Defendants for Willful Misconduct)

23. Plaintiff repeats and incorporates herein by reference each and every allegation contained in paragraphs 1, 2 and 3, above.

24. Defendant Michael Jackson intentionally and wilfully violated the Penal Code of the State of California by his actions and contact with plaintiff. These Penal Code violations include, but are not limited to the following:



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(a) Defendant Michael Jackson intentionally and willfully violated Penal Code Section 288 by willfully and lewdly committing lewd and lascivious acts upon or with the body, or any part or member thereof, of plaintiff, a child under the age of 14 years, with the intent of arousing, appealing to or gratifying the lust or passions or sexual desires of said defendant.

(b) Defendant Michael Jackson intentionally and willfully violated Penal Code Section 1165.1 by said defendant's sexual abuse of plaintiff.

(c) Defendant Michael Jackson intentionally and willfully violated Penal Code Section 288a by acts that he committed upon plaintiff.

(d) Defendant Michael Jackson intentionally and willfully violated Penal Code Section 647.6 by annoying and molesting plaintiff.

The actions of defendant Michael Jackson which violated the Penal Code of the State of California include but are not limited to defendant Michael Jackson orally copulating plaintiff, defendant Michael Jackson masturbating plaintiff, defendant Michael Jackson eating the semen of plaintiff, and defendant Michael Jackson having plaintiff fondle and manipulate the breasts and nipples of defendant Michael Jackson while defendant Michael Jackson would masturbate.

25. As a direct and proximate result of the acts committed by defendant Michael Jackson upon the plaintiff in violation of the Penal Code of the State of California, the plaintiff has suffered injury to his health, strength and activity, injury to his body and shock and injury to his nervous system, all of which

1 injuries have caused and continue to cause plaintiff great  
2 mental, physical and nervous pain and suffering and emotional  
3 distress, all to plaintiff's damage in an amount in excess of the  
4 minimum jurisdictional amount of the Superior Court.

5 26. As a further, direct and proximate result of the acts  
6 committed by the defendant Michael Jackson upon the plaintiff, in  
7 violation of the Penal Code of the State of California, the  
8 plaintiff was required to and did and will be required to employ  
9 health care professionals to examine, treat and care for  
10 plaintiff and has and will incur medical and incidental expenses.  
11 The exact amount of such expense is unknown to plaintiff at this  
12 time and plaintiff will ask leave to amend this pleading to set  
13 forth the exact amount thereof when the same is ascertained by  
14 plaintiff, or plaintiff will offer proof thereof at the time of  
15 trial.

16 27. Defendant Michael Jackson by repeatedly violating the  
17 Penal Code of the State of California has been guilty of  
18 oppression, fraud and malice; has engaged in conduct which is  
19 intended by said defendant to cause injury to the plaintiff; has  
20 engaged in conduct which is despicable conduct carried on by said  
21 defendant with the willful and conscious disregard of the rights  
22 or safety of plaintiff; has engaged in despicable conduct that  
23 subjects plaintiff to cruel and unjust hardship in disregard of  
24 plaintiff's rights; and has used intentional misrepresentation,  
25 deceit and concealment of material facts known to said defendant  
26 with the intention of depriving plaintiff of his legal rights and  
27 otherwise causing injury to plaintiff, thereby entitling  
28 plaintiff to an award of exemplary and punitive damages in an

1 amount to be determined at the trial.  
2

3 FIFTH CAUSE OF ACTION

4 (By Plaintiff Against All Defendants for  
5 Intentional Infliction of Emotional Distress)  
6

7 28. Plaintiff repeats and incorporates herein by reference  
8 each and every allegation contained in Paragraphs 1, 2 and 3.  
9 above.

10 29. During 1993 defendant Michael Jackson repeatedly  
11 engaged in sexual conduct with plaintiff and other conduct with  
12 plaintiff all of which was directed to gratifying defendant  
13 Michael Jackson's lust, passions and sexual desire. The sexual  
14 conduct included but is not limited to defendant Michael Jackson  
15 orally copulating plaintiff, defendant Michael Jackson  
16 masturbating plaintiff, defendant Michael Jackson eating the  
17 semen of plaintiff, and defendant Michael Jackson having  
18 plaintiff fondle and manipulate the breasts and nipples of  
19 defendant Michael Jackson while defendant Michael Jackson would  
20 masturbate.

21 30. Defendant Michael Jackson knew or should have known  
22 that these intentional acts were likely to lead to mental and  
23 physical illness to plaintiff and likely to cause plaintiff to  
24 suffer severe emotional distress.

25 31. As a direct and proximate result of the conduct  
26 committed by defendant Michael Jackson as set forth hereinabove,  
27 the plaintiff has suffered injury to his health, strength and  
28 activity, injury to his body and shock and injury to his nervous

1 system, all of which injuries have caused and continue to cause  
2 plaintiff great mental, physical and nervous pain and suffering  
3 and emotional distress, all to plaintiff's damage in an amount in  
4 excess of the minimum jurisdictional amount of the Superior  
5 Court.

6 32. As a direct and proximate result of the conduct  
7 committed by defendant Michael Jackson as set forth hereinabove,  
8 the plaintiff was required to and did and will be required to  
9 employ health care professionals to examine, treat and care for  
10 plaintiff and has and will incur medical and incidental expenses.  
11 The exact amount of such expense is unknown to plaintiff at this  
12 time and plaintiff will ask leave to amend this pleading to set  
13 forth the exact amount thereof when the same is ascertained by  
14 plaintiff, or plaintiff will offer proof thereof at the time of  
15 trial.

16 33. As a direct and proximate result of the conduct  
17 committed by defendant Michael Jackson as set forth hereinabove,  
18 said defendant has been guilty of oppression, fraud and malice;  
19 has engaged in conduct which is intended by said defendant to  
20 cause injury to the plaintiff; has engaged in conduct which is  
21 despicable conduct carried on by said defendant with the willful  
22 and conscious disregard of the rights or safety of plaintiff; has  
23 engaged in despicable conduct that subjects plaintiff to cruel  
24 and unjust hardship in disregard of plaintiff's rights; and has  
25 used intentional misrepresentation, deceit and concealment of  
26 material facts known to said defendant with the intention of  
27 depriving plaintiff of his legal rights and otherwise causing  
28 injury to plaintiff, thereby entitling plaintiff to an award of

1 exemplary and punitive damages in an amount to be determined at  
2 the trial.

3  
4 SIXTH CAUSE OF ACTION

5 (By Plaintiff Against All Defendants for Fraud)

6  
7 34. Plaintiff repeats and incorporates herein by reference  
8 each and every allegation contained in paragraphs 1, 2, 3, 4, 5,  
9 6, 7, 12, 13, 18, 19, 24, 29 and 30, above.

10 35. Defendant Michael Jackson so that he could commit the  
11 acts alleged hereinabove made repeated misrepresentations to  
12 plaintiff including that defendant Michael Jackson was a true  
13 friend of plaintiff; that defendant Michael Jackson had the best  
14 interests of plaintiff in mind even while he was engaged in the  
15 acts described in detail hereinabove; that defendant Michael  
16 Jackson would suffer despair and great depression if Michael  
17 Jackson was not allowed to perform the acts alleged hereinabove;  
18 and that the acts which defendant Michael Jackson committed upon  
19 plaintiff were normal, usual and customary acts in a relationship  
20 between friends.

21 36. Each of these representations were false and known to  
22 be false by defendant Michael Jackson.

23 37. Each of these representations were made by defendant  
24 Michael Jackson in an intent to deceive plaintiff and so that  
25 plaintiff Michael Jackson would be able to satisfy said  
26 defendant's lust, passions and sexual desires through the abuse  
27 of plaintiff.

28 38. Plaintiff believed the representations to be true and

1 acting in reliance upon these representations allowed defendant  
2 Michael Jackson to commit the acts alleged hereinabove.

3 39. As a direct and proximate result of the fraudulent  
4 representations made by defendant Michael Jackson to plaintiff,  
5 the plaintiff has suffered injury to his health, strength and  
6 activity, injury to his body and shock and injury to his nervous  
7 system, all of which injuries have caused and continue to cause  
8 plaintiff great mental, physical and nervous pain and suffering  
9 and emotional distress, all to plaintiff's damage in an amount in  
10 excess of the minimum jurisdictional limit of the Superior Court.

11 40. As a further, direct and proximate result of the  
12 fraudulent representations made by defendant Michael Jackson to  
13 plaintiff, the plaintiff was required to and did and will be  
14 required to employ health care professionals to examine, treat  
15 and care for plaintiff and has and will incur medical and  
16 incidental expenses. The exact amount of such expense is unknown  
17 to plaintiff at this time and plaintiff will ask leave to amend  
18 this pleading to set forth the exact amount thereof when the same  
19 is ascertained by plaintiff, or plaintiff will offer proof  
20 thereof at the time of trial.

21 41. Defendant Michael Jackson by repeatedly making  
22 fraudulent representations to plaintiff has been guilty of  
23 oppression, fraud and malice; has engaged in conduct which is  
24 intended by said defendant to cause injury to the plaintiff; has  
25 engaged in conduct which is despicable conduct carried on by said  
26 defendant with the willful and conscious disregard of the rights  
27 or safety of plaintiff; has engaged in despicable conduct that  
28 subjects plaintiff to cruel and unjust hardship in disregard of



1 plaintiff's rights; and has used intentional misrepresentation,  
2 deceit and concealment of material facts known to said defendant  
3 with the intention of depriving plaintiff of his legal rights and  
4 otherwise causing injury to plaintiff, thereby entitling  
5 plaintiff to an award of exemplary and punitive damages in an  
6 amount to be determined at the trial.

7  
8 SEVENTH CAUSE OF ACTION

9 (By Plaintiff Against All Defendants for Negligence)

10  
11 42. Plaintiff repeats and incorporates herein by reference  
12 each and every allegation contained in Paragraphs 1, 2 and 3,  
13 above.

14 43. Defendant Michael Jackson owed a duty to use ordinary  
15 care in his relationship with plaintiff and not to take advantage  
16 of plaintiff's age or of plaintiff's trust in defendant Michael  
17 Jackson. Further, defendant Michael Jackson was at all times  
18 obligated to comply with all provisions of the Penal Code of the  
19 State of California and other jurisdictions and to specifically  
20 comply with the Penal Code Sections alleged in paragraph 24,  
21 above.

22 44. Defendant Michael Jackson negligently had offensive  
23 contacts with plaintiff which were both explicitly sexual and  
24 otherwise.

25 45. As a direct and proximate result of the negligence of  
26 defendant Michael Jackson as alleged hereinabove, the plaintiff  
27 has suffered injury to his health, strength and activity, injury  
28 to his body and shock and injury to his nervous system, all of

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1 which injuries have caused and continue to cause plaintiff great  
2 mental, physical and nervous pain and suffering and emotional  
3 distress, all to plaintiff's damage in an amount in excess of the  
4 minimum jurisdictional limit of the Superior Court.

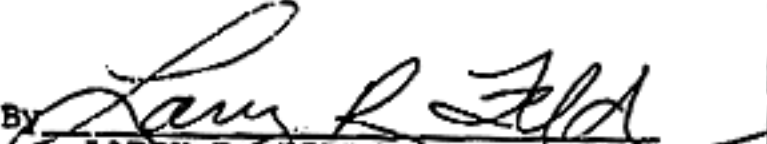
5 46. As a further, direct and proximate result of the  
6 negligence of defendant Michael Jackson, the plaintiff was  
7 required to and did and will be required to employ health care  
8 professionals to examine, treat and care for plaintiff and has  
9 and will incur medical and incidental expenses. The exact amount  
10 of such expense is unknown to plaintiff at this time and  
11 plaintiff will ask leave to amend this pleading to set forth the  
12 exact amount thereof when the same is ascertained by plaintiff,  
13 or plaintiff will offer proof thereof at the time of trial.

14  
15 WHEREFORE, plaintiff prays for judgment against defendants,  
16 and each of them, as follows:

- 17  
18 1. For compensatory damages according to proof;  
19 2. For exemplary and punitive damages according to proof;  
20 3. For costs of suit incurred herein; and,  
21 4. For such other and further relief as the Court deems  
22 just and proper.

23 Dated: September 14, 1993

24 LARRY R. FELDMAN, Esq.  
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26 & KLEVENS  
27 A Law Corporation

28 By   
LARRY R. FELDMAN  
Attorneys for Plaintiff