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Cary Snowden, Michael Irvine, Dawn Holman
and Boys and Girls Clubs of Sonoma Valley

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SONOMA

CARY SNOWDEN, an individual;
MICHAEL IRVINE, an individual; DAWN
HOLMAN, an individual; and BOYS &
GIRLS CLUBS OF SONOMA VALLEY, a
nonprofit organization,

Plaintiff,

vs.

LAURA AINSWORTH, an individual;
ADINA FLORES, an individual; and DOES
1-50, inclusive,

Defendants.

Case No.

PLAINTIFFS' COMPLAINT FOR:

- 1. DEFAMATION;**
- 2. FALSE LIGHT;**
- 3. INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS;**
- 4. NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS;**
- 5. INTENTIONAL INTERFERENCE WITH CONTRACTUAL RELATIONSHIPS;**
- 6. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE; and**
- 7. INJUNCTIVE RELIEF.**

(Unlimited Civil)

1 Plaintiffs Cary Snowden, Michael Irvine, Dawn Holman, and the Boys and Girls Clubs of
2 Sonoma Valley ("Plaintiffs") complain against the Defendants Laura Ainsworth, Adina Flores, and
3 DOES 1-50, and each of them, ("Defendants") as follows:

4 **GENERAL ALLEGATIONS**

5 1. The true names or capacities, whether individual, corporate, governmental or associate,
6 of the defendants named herein as a DOE are unknown to Plaintiffs, who therefore sue said
7 defendants by such fictitious names. Plaintiffs pray leave to amend this complaint to show their true
8 names and capacities when the same have been finally determined. Plaintiffs are informed and
9 believe, and upon such information and belief allege, that each of the defendants designated herein as
10 a DOE is legally responsible in some manner for the events and happenings herein referred to, and
11 caused injuries and damages proximately thereby to Plaintiffs, as is hereinafter alleged.

12 2. At all times herein mentioned Defendants DOES 1 through 50, and each of them, were
13 individuals or business entities, the exact form and nature of which are unknown to Plaintiffs at this
14 time but were licensed to and/or doing business in the State of California. Plaintiffs pray leave to
15 amend this complaint, adding the true names and nature of said individuals and business entities,
16 when their names have been ascertained.

17 3. At all times relevant to this action, each of the Defendants, including those fictitiously
18 named, was the agent, servant, partner, co-conspirator of the other defendants and was acting within
19 the scope of said agency, conspiracy, partnership, agreement or marriage with the knowledge and
20 consent or ratification of each of the other defendants in doing the things alleged herein to achieve a
21 common goal of harming Plaintiffs.

22 4. The allegations within this Complaint arose or were conducted in Sonoma County,
23 California.

24 5. Plaintiff Cary Snowden is an individual, and at all times relevant to this action, was a
25 resident of the County of Sonoma, California.

26 6. Plaintiff Michael Irvine is an individual, and at all times relevant to this action, was a
27 resident of the County of Sonoma, California.

28 /////

1 7. Plaintiff Dawn Holman is an individual, and at all times relevant to this action, was a
2 resident of the County of Sonoma, California.

3 8. Plaintiff Boys & Girls Clubs of Sonoma Valley (“BGCSV”) is a California nonprofit
4 organization, serving the Sonoma Valley, in the County of Sonoma, California.

5 9. Upon information and belief, Defendant Laura Ainsworth, was a resident of the County
6 of Sonoma, California at all times relevant to this action.

7 10. Upon information and belief, Defendant Adina Flores, an individual, was residing or
8 routinely conducting business within or availing herself of the benefits of, the County of Sonoma,
9 California at all times relevant to this action.

10 11. The claims relate or arise from actions and omissions which occurred in whole or in
11 part within the County of Sonoma, California.

12 12. The amount in controversy exceeds \$35,000.

13 13. Jurisdiction and venue are proper before this court pursuant to Code of Civil Procedure
14 § 395 et seq.

15 14. In 2016, Paul Kilgore, a former employee of Plaintiff BGCSV was arrested for child
16 sexual abuse in Sonoma County case number SCR-694346. He had worked for Plaintiff BGCSV from
17 approximately 2002 to 2013. He was convicted in 2018 for his horrendous crimes and is currently
18 serving a 150-year sentence in prison.

19 15. Since Kilgore’s arrest in 2016 and subsequent conviction, the investigating managers
20 and board members of BGCSV have since voluntarily or involuntarily left the organization; a fact
21 known by the Defendants.

22 16. Since that tragedy, Plaintiff BGCSV has worked hard to re-establish itself as a positive
23 resource for the community of Sonoma County. Currently, there are approximately 2,000 children
24 receiving services and participating in programs through Plaintiff BGCSV daily.

25 17. Long after Mr. Kilgore had left the organization and was arrested, in late 2017, the
26 board of Plaintiff BGCSV asked Plaintiff Cary Snowden if she would be interested in becoming the
27 organization’s next CEO.
28

1 18. In, or about, February of 2018 after applying, Plaintiff Cary Snowden was appointed as
2 the CEO of BGCSV.

3 19. Plaintiff Dawn Holman was an employee of BGCSV from the summer of 2014 into
4 2015, and returned again to employment with BGCSV in 2018; she now continues to be an employee
5 of BGCSV.

6 20. Plaintiff Michael Irvine has been, and continues to be, an employee of Plaintiff
7 BGCSV since 2017.

8 21. Upon information and belief, since March of 2018 and continuously thereafter,
9 Defendant Laura Ainsworth has inundated Plaintiffs and various third parties with emails and other
10 correspondence which untruthfully claimed, both generally and specifically at various times,
11 assertions of fact and not mere opinion, that Plaintiffs and their agents were conspiring or had
12 conspired to cover up child sexual abuse, were failing to report child sexual abuse, were facilitating
13 and participating in child abuse including pedophilia or grooming, were violating State and Federal
14 employment laws, as well as other current or past nefarious, illegal or lascivious actions, including but
15 not limited to, misappropriation of funds and abuse of power, claiming Plaintiff Cary Snowden was a
16 member or affiliate of the Ku Klux Klan and that Plaintiffs were systemically implementing
17 detrimental agendas against minorities based on race all of which is untrue.

18 22. Defendants knew or should have known that the defamatory and disparaging
19 statements made about Plaintiffs were untrue. Such statements were conveyed to third party
20 recipients with malice or reckless disregard for the truth and Plaintiffs' rights and safety. These safety
21 concerns have become increased given the nature of the statements pertaining to pedophilia and other
22 highly deplorable conduct which is commonly known to spark a threat or act of violence.

23 23. Plaintiff BGCSV has contracts with numerous schools within the jurisdiction of the
24 Sonoma Valley Unified School District as well as actual and prospective economic advantages and
25 benefits with private and public funding for programs designed to help children and families in
26 Sonoma County. Defendants have taken wrongful and unlawful efforts to interfere, make difficult,
27 disrupt or otherwise obstruct the benefits of said contracts, potential contracts, donations, funding and
28 relationships.

1 24. Plaintiffs are informed and believe that Defendant Laura Ainsworth and her agents
2 created a Facebook account called “Boys & Girls Clubs of Sonoma Valley Failures” and other social
3 media or internet-based sites for third party consumption. Through this account and others, Defendant
4 Laura Ainsworth attacked Plaintiffs and other employees of Plaintiff BGCSV, and board members of
5 Plaintiff BGCSV, claiming that they were participating in the illegal and disgusting actions identified
6 above, *supra*.

7 25. In addition to countless emails, Defendant Laura Ainsworth sent letters and faxes to
8 Plaintiffs’ homes and offices with similar harassing and disparaging content.

9 26. On information and belief, and thus alleged by Plaintiffs, Defendant Laura Ainsworth
10 and her agents have been spying on BGCSV facilities and events to intimidate, harass and instill fear.
11 This has included when children, parents and employees were present and conducting activities for
12 said children and families. Defendant Laura Ainsworth and/or her agents have taken photographs and
13 documented the participants creating an uncomfortable, unsafe and intimidating environment.
14 Additionally, upon information and belief Defendant Laura Ainsworth has engaged in harassing or
15 menacing phone calls toward Plaintiffs.

16 27. Upon information and belief, Defendant Laura Ainsworth sought to escalate her
17 efforts, in or about the year 2024, by recruiting Defendant Adina Flores. At the time, Adina Flores had
18 a known reputation for intimidation and controversial techniques of instilling fear and disseminating
19 misinformation. This included, but was not limited to, the reliance on her physically intimidating
20 boyfriend that would expressly and implicitly threaten violence against any person that Adina Flores
21 focussed upon, including but not limited to, threatening minor children of a Sonoma County District
22 Supervisor. Defendant Adina Flores personally makes various statements about a willingness to
23 embarrass, harass and possibly hurt the children without remorse as to any person she feels deserves
24 her scrutiny. This is stated with the intention to strike fear and prevent others from asserting their
25 rights and protecting themselves publicly.

26 28. Based on these factors and her social media audience, Defendant Laura Ainsworth
27 recruited Defendant Adina Flores to further her crusade of defamation and harassment against the
28 Plaintiffs while placing an intentional human lightning rod or shield between herself and the tortious

1 actions described herein.

2 29. At the bequest, instruction, and encouragement of Defendant Laura Ainsworth,
3 Defendant Adina Flores became the forward-facing mouthpiece and intimidation factor of these
4 efforts to harass, vex, intimidate, injure and damage Plaintiffs and those close to Plaintiffs. Upon
5 information and belief, Defendant Laura Ainsworth falsely informed Adina Flores that Plaintiffs were
6 committing crimes related to sexual abuse, misappropriation of funds, violation of employment laws,
7 abuse of power and others. It is further believed that Laura Ainsworth falsely conveyed to Defendant
8 Adina Flores that she had protected status as a “whistleblower” under California and Federal law
9 despite never having worked at BGCSV.

10 30. In furtherance of this partnership, Defendant Adina Flores has uploaded many posts to
11 her social media platforms, including, but not limited to, Instagram and TikTok, where she reiterates
12 all the same defamatory statements of Laura Ainsworth about Plaintiffs to numerous third-party
13 recipients. Those messages are then shared, and the misinformation chain is furthered.

14 31. Plaintiffs are informed and believe that Defendants, together or separately, created
15 template letters urging recipients to cease partnership with Plaintiff BGCSV, to stop donations and
16 funding and have gotten members of the public to send such letters in an effort to disrupt and
17 terminate the business operations and employment of the Plaintiffs and other employees.

18 32. On March 18, 2024, Defendant Adina Flores implemented a true blitzkrieg style attack
19 by sending an email to every faculty member at Presentation School where Plaintiff Michael Irvine’s
20 wife worked as a teacher. The email reiterated the defamatory statements and tortious intent of the
21 Defendants identified in this Complaint about Plaintiffs. It was then coupled with the threat of
22 repercussions if action was not taken against Plaintiffs or Mr. Irvine’s spouse. The message intended
23 was clear, the Defendants will harass and intimidate the family members and co-workers of any
24 person associated with BGCSV.

25 33. Plaintiff BGCSV has a contract with Boys & Girls Clubs of America (“BGCA”)
26 allowing it to operate as a franchise, licensee or subsidiary in Northern California. Defendants were
27 aware of this contract for all times relevant to this Complaint.

28 34. Defendants contacted the BGCA and falsely reported to BGCA that Plaintiffs were

1 actively engaged in the illegal and lascivious activities described within this Complaint. This was
2 done in an attempt to get BGCA to close down or generally disrupt the business of Plaintiff BGCSV.

3 35. Upon information and belief, Defendants repeated the defamatory and disparaging
4 statements identified within this Complaint or made similar untrue statements to various third parties
5 regarding Plaintiffs' alleged behavior and conduct as though the alleged behavior and conduct was
6 true.

7 36. These statements to various third parties were knowingly untrue or made in reckless
8 disregard of the truth to disparage, discredit and harm the Plaintiffs' reputations while also seeking to
9 obtain unjust financial gain in favor of the Defendants.

10 37. The statements made by the Defendants identified above were false yet made and
11 presented as statements of fact as opposed to mere opinion.

12 38. The statements specifically identified the Plaintiffs to members of the community in or
13 around Sonoma County and their families.

14 39. Defendants knew these statements were false yet made them intentionally and
15 maliciously in order to harm, harass, damage, discredit, intimidate, isolate and oppress Plaintiffs.

16 40. Upon information and belief, Defendants have a pattern of practice of falsifying
17 allegations against others with an intention to obtain unlawful and unjust financial gain or improved
18 reputation, opportunities or credibility.

19 41. Plaintiffs have not engaged in any of the unlawful or lascivious actions identified
20 within this Complaint and conveyed by the Defendants to third parties.

21 42. As a direct and proximate cause of the Defendants' actions and omissions, Plaintiffs
22 did in fact incur and will continue to incur, incidental expenses, increased operating costs, loss of
23 revenue, loss of economic advantages, lost opportunities, investigation costs, and attorneys' fees all in
24 amounts in excess of the jurisdictional limit of this Court to be proven at trial.

25 43. As a direct and proximate cause of the Defendants' actions and omissions, Plaintiffs
26 Snowden, Irvine and Holman have and continue to suffer from severe mental and emotional distress
27 with physical manifestations by way of sleeplessness, headaches, stress, anxiety, worry, loss of
28 appetite, sadness, distrust, nervousness, fatigue and general loss of enjoyment of life. The actions and

omissions of the Defendants have also increased operating costs and reduced the efficiency, quality and scope of services provided by BGCSV while directly obstructing or interfering with known financial relationships and benefits all in amounts to be proven at trial.

44. These statements to various third parties were made maliciously, fraudulently or in reckless disregard of the rights or safety of the Plaintiffs entitling them to punitive damages in accordance with proof from these Defendants.

45. Plaintiffs' discovery of Defendants' statements and the identity of the recipients of said statements was and continues to be delayed because the statements were often made anonymously, under disguise, concealment and to third parties without Plaintiffs' knowledge.

FIRST CAUSE OF ACTION – DEFAMATION

(As to all Defendants by all Plaintiffs)

46. Plaintiffs hereby incorporate by reference all the allegations set forth in the preceding paragraphs as though alleged in this cause of action.

47. Defendants made the statements identified above to various third parties which were presented as factual and not mere opinion.

48. Upon information and belief these statements concerned criminal, lascivious, immoral and sexual disparaging factual assertions which were made in verbal, written or electronic form constituting defamation per se as both libel and slander.

49. These statements included, without limitation, false allegations that Plaintiff Snowden was racist, and a member of racist, hateful, and deplorable organizations and that the other Plaintiffs were associates of her as a member of such organizations, including the Ku Klux Klan.

50. These statements were made by Defendants in an effort to intentionally harm, intimidate, oppress, coerce, scare, damage, isolate and extort the Plaintiffs for Defendants' gain.

51. These statements were made to third parties who reasonably understood that the statements were about Plaintiffs as their names, descriptions or contact information were provided by the Defendants to the recipients.

52. The facts and circumstances known to the recipients of the statements tended to and actually did injure Plaintiffs while exposing them to hatred, contempt, ridicule, danger, fear of

1 violence, economic ruin, damage, injury and shame while also discouraging others to associate or deal
2 with Plaintiffs.

3 53. The statements were false.

4 54. The Defendants failed to use reasonable care to determine the truth or falsity of the
5 statements or intentionally conveyed them as knowingly false statements to third parties.

6 55. Plaintiffs suffered harm to in amounts to be proven at trial.

7 56. The statements were a substantial factor in causing Plaintiffs' harm.

8 57. Plaintiffs endured and continue to endure shame, anxiety, mortification, fear, loss of
9 reputation, isolation, worry, hurt feelings, other symptoms and severe emotional and mental distress
10 with physical manifestations as a direct result of the statements and Defendants' wrongful conduct as
11 well as loss of business profits, increased overhead, lost opportunity, incidental damages and legal
12 costs.

13 58. Plaintiffs are entitled to compensation based on presumed and actual damages.

14 59. Defendants acted knowingly, maliciously, oppressively, fraudulently or with reckless
15 disregard of the Plaintiffs' rights entitling Plaintiffs to exemplary or punitive damages.

16 **SECOND CAUSE OF ACTION – INVASION OF PRIVACY, FALSE LIGHT**

17 (As to all Defendants by all Plaintiffs)

18 60. Plaintiffs hereby incorporate by reference all the allegations set forth in the preceding
19 paragraphs as though alleged in this cause of action.

20 61. Defendants publicly disclosed information or material that showed Plaintiffs in a false
21 light, including, without limitation, statements that Plaintiffs were or continue to cover up, facilitate
22 and participate in child sexual abuse as well as other criminally or civilly liable actions. Defendants
23 have made false statements that Plaintiffs are members, affiliates or participants in the Ku Klux Klan
24 and that they have systematically created, participated or facilitated a detrimental white supremacists'
25 agenda against minorities in the Sonoma County Community which is untrue. These statements were
26 made in various formats, including email, social media posts, letters, and statements made in public.
27 These statements were addressed to numerous individuals and entities.

28 62. These statements included, without limitation, false allegations that Plaintiff Snowden

1 was racist, and a member of racist, hateful, and deplorable organizations.

2 63. The false light created by the disclosure is highly offensive, and would be highly
3 offensive to a reasonable person, as the statements pertain to participation in covering up, failing to
4 report, facilitating, and participating in child sexual abuse.

5 64. Defendants knew the statements would create a false impression about Plaintiffs and
6 acted with reckless disregard for the truth.

7 65. Defendants were negligent in failing to determine the truth of the information or
8 whether a false impression would be created by the disclosure of the false statements.

9 66. Plaintiffs were harmed due to Defendants' disclosure of the false statements, including,
10 without limitation, harm to their business, profession, and occupation. Plaintiffs had to spend
11 significant sums of money to mitigate the damage caused by Defendants' statements.

12 67. Defendants' statements were a substantial factor in causing Plaintiffs' harm.

13 68. The statements were false.

14 69. The Defendants failed to use reasonable care to determine the truth or falsity of the
15 statements or intentionally conveyed them as knowingly false statements to third parties.

16 70. Plaintiffs suffered harm in amounts to be proven at trial.

17 71. The statements were a substantial factor in causing Plaintiffs' harm.

18 72. Plaintiffs endured and continue to endure shame, anxiety, mortification, fear, loss of
19 reputation, isolation, worry, hurt feelings, other symptoms and severe emotional and mental distress
20 with physical manifestations as a direct result of the statements and Defendants' wrongful conduct.

21 73. Defendants acted knowingly, maliciously, oppressively, fraudulently or with reckless
22 disregard of the Plaintiffs' rights entitling Plaintiffs to exemplary or punitive damages.

23 **THIRD CAUSE OF ACTION - INTENTIONAL INFLICTION**

24 **OF EMOTIONAL DISTRESS**

25 (As to all Defendants by Plaintiffs Irvine, Holman and Snowden)

26 74. Plaintiffs hereby incorporate by reference all the allegations set forth in the preceding
27 paragraphs as though alleged in this cause of action.

28 75. Defendants' conduct as described and articulated within this Complaint and other

1 actions to be determined and proven at trial caused Plaintiff to suffer severe emotional distress,
2 including but not limited to, stress, anxiety, worry, fear, sleeplessness, loss of enjoyment of life and
3 other negative and detrimental emotions with physical manifestations.

4 76. Defendants' conduct as described within this Complaint was extreme and outrageous
5 as no person in a civilized society should be subjected to false accusations of crimes, complacency in
6 crimes or assistance in such crimes, especially those of a sexual nature involving children.

7 77. Defendants' intended to cause Plaintiffs severe emotional distress or acted with
8 reckless disregard of the probability that Plaintiffs would suffer severe emotional distress given the
9 significant consequences of Defendants' actions against Plaintiff, including potential criminal
10 prosecution of Plaintiff or alleged association with criminals or those engaging in sexual assault or
11 harassment of children or other persons and other criminal, deplorable or other actionable conduct as
12 discussed within this Complaint.

13 78. Plaintiffs did in fact suffer severe emotional distress.

14 79. Defendants' conduct was a substantial factor in causing Plaintiffs' severe emotional
15 distress.

16 80. Plaintiffs are entitled to general and special damages, including but not limited to
17 medical expenses, compensatory damages, lost earnings, lost earning potential, personal injury by
18 way of mental, emotional and physical manifestation, as well as incidental damages and costs.

19 81. Defendants acted knowingly, maliciously, oppressively, fraudulently or with reckless
20 disregard of the Plaintiffs' rights entitling Plaintiffs to exemplary or punitive damages.

21 **FOURTH CAUSE OF ACTION – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

22 (As to all Defendants by Plaintiffs Snowden, Holman and Irvine)

23 82. Plaintiffs hereby incorporate by reference all the allegations set forth in the preceding
24 paragraphs as though alleged in this cause of action.

25 83. Defendants' conduct as described and articulated within this Complaint and other
26 actions to be determined and proven at trial was negligent and negligently caused Plaintiffs to suffer
27 severe emotional distress, including but not limited to, stress, anxiety, worry, fear, sleeplessness, loss
28 of enjoyment of life and other negative and detrimental emotions.

84. Defendants had a duty not to fabricate defamatory information about Plaintiffs.

85. Defendants had a duty to investigate their allegations regarding Plaintiffs prior to conveying them, in both verbal and written formats, to third parties.

86. Defendant had a duty not to knowingly spread lies about Plaintiffs.

87. Defendants breached that duty by fabricating information about Plaintiffs; failing to investigate the validity of those fabrications; and conveying the lies to third parties, knowing the statements to be false.

88. A reasonably careful person would not create false allegations and spread them, let alone spread them on such a massive and intentionally harmful scale.

89. Defendants' negligence caused Plaintiffs to suffer severe emotional distress, including but not limited to, stress, anxiety, worry, fear, sleeplessness, loss of enjoyment of life and other negative and detrimental emotions with physical manifestations.

90. Defendants' negligence was a substantial factor in causing Plaintiffs' serious and severe emotional distress.

91. The emotional distress is so severe and serious that a reasonable person would be unable to cope with it.

92. Defendants' conduct as described within this Complaint was extreme and outrageous as no person in a civilized society should be subjected to false accusations of crimes, complacency in crimes or assistance in such crimes, especially those of a sexual nature involving a child as well as others.

93. Defendants' intended to cause Plaintiffs severe emotional distress or acted with reckless disregard of the probability that Plaintiffs would suffer severe emotional distress given the significant consequences of Defendant's actions against Plaintiff, including potential criminal prosecution of Plaintiffs or alleged association with criminals or those engaging in sexual assault or harassment of children or other persons as well as other criminal, deplorable or other actionable conduct as discussed in this Complaint.

94. Plaintiffs did in fact suffer severe emotional distress.

95. Defendants' conduct was a substantial factor in causing Plaintiffs' severe emotional

1 distress.

2 96. Plaintiffs are entitled to general and special damages, including but not limited to
3 medical expenses, compensatory damages, lost earnings, lost earning potential, personal injury by
4 way of mental, emotional and physical manifestation, as well as incidental damages and costs.

5 97. Defendants acted knowingly, maliciously, oppressively, fraudulently or with reckless
6 disregard of the Plaintiffs' rights entitling Plaintiffs to exemplary or punitive damages.

7 **FIFTH CAUSE OF ACTION – INTENTIONAL INTERFERENCE**

8 **WITH CONTRACTUAL RELATIONSHIPS**

9 98. Plaintiffs hereby incorporate by reference all the allegations set forth in the preceding
10 paragraphs as though alleged in this cause of action.

11 99. There was a contract between Plaintiffs and the Sonoma Valley Unified School
12 District.

13 100. There were employment contracts between Plaintiffs and various employees and
14 BGCSV board members who were targeted, attacked, and subject to the harmful statements made by
15 Defendants.

16 101. There was a contract between Plaintiffs and the BGCA. Defendants contacted BGCA
17 in an attempt to get them to close down Plaintiff BGCSV. In doing so, Defendants falsely reported to
18 BGCA that Plaintiffs were covering up sexual abuse of children, failing to report sexual abuse of
19 children, engaging in sexual abuse of children, engaging in misappropriation of funds, were violating
20 employment laws, were members or affiliates of the Ku Klux Klan as well as other illegal, nefarious
21 or lascivious actions.

22 102. There were employment contracts between the individual plaintiffs, and their co-
23 workers with the BGCSV.

24 103. Defendants knew of these contracts.

25 104. Defendants attempted to or did interfere with these contractual relationships as alleged
26 in this Complaint.

27 105. Defendants conduct prevented performance or made performance more expensive or
28 difficult, including, without limitation, dedicating labor, hours, and costs on addressing Defendants'

1 false statements and behavior. Each hour and dollar that was spent to assuage concern amongst the
2 public, employees, and the BGCSV's partners was a dollar that was taken from providing services to
3 children.

4 106. Defendants intended to disrupt the performance of these contracts, or knew that
5 disruption of performance was certain or substantially certain to occur.

6 107. Plaintiffs were harmed; and

7 108. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

8 **SIXTH CAUSE OF ACTION – INTENTIONAL INTERFERENCE WITH PROSPECTIVE**
9 **ECONOMIC ADVANTAGE**

10 109. Plaintiffs hereby incorporate by reference all the allegations set forth in the preceding
11 paragraphs as though alleged in this cause of action.

12 110. Plaintiffs were in an economic relationship with schools in the Sonoma Valley.

13 111. Those economic relationships probably would have resulted in an economic benefit to
14 Plaintiffs.

15 112. Defendants knew that Plaintiffs were in economic relationships with the schools.

16 113. Defendants attempted to or did interfere with these economic relationships as alleged in
17 this Complaint.

18 114. Defendants engaged in making false statements that Plaintiffs were engaging in,
19 covering up, failing to report, facilitating, and participating in child sexual abuse.

20 115. Defendants made these statements with the intended to disrupt the relationship between
21 Plaintiffs and their school partners.

22 116. Defendants knew that a disruption of the relationship between Plaintiffs and the
23 schools was certain or substantially certain to occur.

24 117. The relationship was disrupted in ways to be proven at trial. This disruption includes,
25 but is not limited to, both parties having to take time to address the Defendants' false statements,
26 rather than move forward with the services both Plaintiffs and the schools owed each other.

27 118. Plaintiffs were harmed due to the disruption in the economic relationship between
28 themselves and the schools they serve in ways to be proven at trial.

119. The Defendants' false statements and conduct were a substantial factor in causing Plaintiffs' harm.

SEVENTH CAUSE OF ACTION – INJUNCTIVE RELIEF

120. Plaintiffs hereby incorporate by reference all the allegations set forth in the preceding paragraphs as though alleged in this cause of action.

121. Plaintiffs are entitled to the relief demanded, herein.

122. The conduct of Defendants has caused and will likely cause irreparable injury to Plaintiffs. Money damages will be insufficient to remedy the injuries caused to Plaintiffs. The injuries are severe and likely to increase with time if Defendants' conduct is not enjoined and prevented.

123. Defendants' actions violated Plaintiffs' rights, and they continue to violate Plaintiffs' rights.

124. Pecuniary compensation would not afford Plaintiffs' adequate relief, and if it were possible to calculate compensation, it would be extremely difficult to ascertain the amount of compensation which would afford adequate relief.

125. Defendants should be permanently enjoined from continuing their unlawful actions of defamation and harassment, and should be ordered to retract all their damaging statements in the same forum and zeal in which they originally occurred.

WHEREFORE, Plaintiffs pray for relief as follows and where appropriate:

- a. General and special damages in amounts to be proven at trial;
- b. For prejudgment interest;
- c. Punitive damages;
- d. For reasonable attorneys' fees, costs and expert costs where available;
- e. Injunctive relief;
- f. Any other relief the court deems proper.

DATED: December 18, 2024

CLEMENT, FITZPATRICK & KENWORTHY

By: _____

DAVIN R. BACHO

Attorneys for Plaintiffs Cary Snowden, Michael Irvine, Dawn Holman, and Boys & Girls Clubs of Sonoma Valley