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 8 Matthew Dababneh

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SACRAMENTO

MATTHEW DABABNEH, an individual;
 Plaintiff,
 v.
 PAMELA LOPEZ, an individual,
 and DOES 1-10,
 Defendants.

Case No.
Unlimited Jurisdiction

COMPLAINT FOR:

(1) DEFAMATION

**(2) INTENTIONAL INFLICTION OF
 EMOTIONAL DISTRESS**

JURY TRIAL DEMANDED

1 Plaintiff Matthew Dababneh (“Plaintiff” or “Dababneh”) alleges as follows against
2 Defendant Pamela Lopez (“Defendant” or “Lopez”) and Does 1 through 10:

3 **NATURE OF THE CASE**

4 1. Defendant Pamela Lopez fabricated a reprehensible and self-serving story to defame
5 Plaintiff Matthew Dababneh by making false and public accusations against him.

6 2. Matthew Dababneh served as an assemblyman in the California State Assembly from
7 on or about January 2014 through December 2017.

8 3. On or about January 16, 2016, Dababneh attended friends’ pre-wedding celebration
9 in a hotel suite in Las Vegas, Nevada, along with dozens of other people.

10 4. Defendant Pamela Lopez, a lobbyist in Sacramento, also attended the party on the
11 evening of January 16, 2016.

12 5. Nearly two years later, on or about December 4, 2017, Lopez held a press conference
13 whereby she publicly and falsely accused Dababneh of sexual assault on the evening of January 16,
14 2016, in the hotel suite bathroom at the party in Las Vegas. On or about December 4, 2017, Lopez
15 also filed a complaint with the California State Assembly, in which she made similarly false
16 statements.

17 **PARTIES**

18 6. Plaintiff Matthew Dababneh is an individual who, at all times mentioned in this
19 Complaint, has been residing in Los Angeles, California. From on or about January 2014 through
20 December 2017, Dababneh was a member of the California State Assembly.

21 7. On information and belief, Defendant Pamela Lopez is an individual who, at all times
22 mentioned in this Complaint, has been residing in Sacramento, California. Lopez is a lobbyist and a
23 partner at K Street Consulting, LLC.

24 8. Defendants sued herein as DOES 1 to 10, inclusive, are unidentified persons
25 (whether corporate, individual, or otherwise) who are responsible in some manner for the acts,
26 omissions, practices, and conduct set forth in this complaint. Plaintiff will seek leave of Court to
27 amend this Complaint to insert the true names and capacities of the fictitiously named Defendants
28 when the same have been ascertained.

FACTUAL ALLEGATIONS

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2 9. Dababneh was elected to the California State Assembly in a special election in
3 November 2013 and reelected to a full term in November 2014.. Dababneh was reelected for a
4 second full term in November 2016 with 65 percent of the vote. Dababneh enjoyed not only strong
5 electoral support in his district, but also had an excellent reputation.

6 10. On or about January 16, 2016, Dababneh, along with approximately 50 others,
7 attended friends' pre-wedding party in SkyLofts hotel suite, in MGM Grand resort in Las Vegas,
8 Nevada. Dababneh spent the evening sober, as Dababneh does not drink alcoholic beverages, and in
9 the company of friends.

10 11. Lopez also attended the party on the evening of January 16, 2016. Lopez admittedly
11 had several alcoholic beverages in the course of the evening.

12 12. After the party, on the evening of January 16, 2016, Lopez sent a text to the host and,
13 on January 19, 2016, Lopez sent an e-mail to the co-host of the party and in both messages she told
14 them what a wonderful time she had had and thanked them for the invitation.

15 13. Nearly two years later, on or about December 4, 2017, Lopez filed a false complaint
16 with the California State Assembly, in which she alleged that, on the evening of January 16, 2016,
17 while at the friends' party, Dababneh pushed Lopez into a bathroom and masturbated in front of her
18 while urging her to touch him. Specifically in her complaint, Lopez stated:

19 "When I went to the bathroom after being at the party for a few hours,
20 I felt the weight of a body push me into the restroom. I heard the door
21 slam behind us. When I turned around, I saw that it was Matt
22 Dababneh. He stood blocking the door and began to masturbate and
move toward me, urging me to touch him. It was a terrifying
experience.... Before the ordeal ended, he told me not to tell anyone."

23 14. In addition to the complaint, on the same day, December 4, 2017, Lopez conducted a
24 news conference in Sacramento, at which she made the same false allegations against Dababneh. In
25 the news conference, Lopez again fabricated that Dababneh followed her into a restroom, exposed
26 himself, masturbated, and asked her to touch him.

1 depression. Defendant acted with malice, oppression, and fraud in engaging in the conduct alleged
2 herein. Such conduct justifies an award of punitive damages against Defendant .

3
4 **PRAYER FOR RELIEF**

5 Wherefore, Plaintiff prays for relief as follows:

- 6 1. For compensatory damages according to proof;
7 2. For all pre-judgment interest accrued;
8 3. For punitive and exemplary damages;
9 4. For such other and further relief as the Court deems just and proper.

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13 DATED: August 14 2018

Respectfully submitted,

14 GLASER WEIL FINK HOWARD
15 AVCHEN & SHAPIRO LLP

16 By: 

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18 JOEL KLEVENS
19 AZIN VALAFAR
20 Attorneys Matthew Dababneh