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8 Attorneys for Plaintiff
 TRINA VENIT

9 **UNITED STATES DISTRICT COURT**
 10 **CENTRAL DISTRICT OF CALIFORNIA**

11
 12 TRINA VENIT, an individual,
 13 Plaintiff,
 14 vs.
 15 ADAM VENIT, an individual,
 16 Defendant.

Case No.: 2:22-cv-04362

COMPLAINT FOR:

1. VIOLATION OF CAL. CIV. CODE § 1708.6 – DOMESTIC VIOLENCE;
2. SEXUAL BATTERY;
3. ASSAULT;
4. BATTERY;
5. FALSE IMPRISONMENT;
6. DEFAMATION;
7. VIOLATION OF CAL. CIV. CODE § 1708.7 – CIVIL STALKING;
8. INTRUSION INTO PRIVATE AFFAIRS; AND
9. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

DEMAND FOR JURY TRIAL

1 Plaintiff Trina Venit (“Plaintiff” or “Trina”) brings this diversity action
2 against Defendant Adam Venit (“Defendant” or “Adam”), and in support thereof,
3 alleges as follows:

4 **INTRODUCTION**

5 1. “I’m untouchable.” Those are the words that Adam often uttered as a
6 terrifying reminder to his wife Trina to keep her quiet and trapped in a dangerously
7 violent and abusive marriage. Adam was and still is a very powerful, well-
8 connected, and feared man. He is the former founding partner of William Morris
9 Endeavor Entertainment, LLC (“WME”), who left WME in disgrace in September
10 2018 as part of a highly publicized settlement following his drunken sexual assault
11 on former NFL player and actor Terry Crews in the midst of a Hollywood party.
12 Sadly, Adam’s brazen public assault on an imposing male former professional
13 athlete pales in comparison to the abuse Adam has and continues to inflict on his
14 wife behind closed doors.

15 2. Over the course of their 20-plus year marriage, Adam has physically,
16 sexually, mentally, emotionally and verbally abused and insistently stalked and
17 monitored Trina. He inflicted countless unspeakable acts upon the woman he
18 professed to love. Adam strangled, punched, kicked, drugged and sexually
19 assaulted her, leaving her bloodied, bruised and scarred on too many occasions to
20 count. When he wasn’t using his fists, he screamed, belittled, insulted, threatened,
21 and spat on her and regularly pushed her out of cars, abandoning her roadside or
22 elsewhere. In what sounds more like a surreal plot line from one of Adam’s A list
23 clients’ films, he admittedly had Trina falsely arrested so that he could scour their
24 home to find, remove and destroy evidence of his horrendous abuse from her phone
25 and computer. And if all that wasn’t nightmarish enough, and despite her repeated
26 pleas that he stop, he has and continues to control her movements, communications,
27 access to money, credit and other personal affairs, friends and family, surveil her
electronic devices and iCloud, and more.

1 Trina he loved her. He loved her so much he wanted Trina all to himself. He did
2 not want her to work, go to school or spend time with friends or family because it
3 took away from Trina's time with him. In truth, these were not signs of the depth of
4 his newfound love for Trina but rather red flags signaling his initial efforts to groom
5 and control Trina.

6 10. Adam proposed to Trina on Christmas Day 1998. They were married
7 on August 6, 1999 in Lanai, Hawai'i, where they planned to one day retire. Adam
8 had two children and a stepchild from a prior marriage and Trina had a child from a
9 prior relationship. Their blended family settled into their new life together in Los
10 Angeles. Adam and Trina welcomed two more children of their own during their
11 marriage.

12 11. Before they were even married, Adam's violent tendencies started to
13 emerge. For example, in February 1999, he threw a kitchen table at Trina when she
14 asked if he had bought her engagement ring at the same place he bought his ex-
15 wife's ring.

16 12. Little by little, Trina witnessed the changes in Adam. The diminutive
17 man she married began to transform physically through the use of steroid injections.
18 His social drinking and casual drug use became insatiable, as did his appetite for
19 aggressive sex with Trina and other men and women, including prostitutes. Over
20 time, Adam pressured and forced Trina to drink alcohol, take drugs and engage in
21 high risk sex with him and others which she painfully endured out of self-
22 preservation.

23 13. Trina was admittedly Adam's muse. They were a team, attending
24 Hollywood events, client dinners and other gatherings together to further his career.
25 As his career skyrocketed, so did his erratic behavior. Adam's success gave him the
26 power that he craved. Adam became used to getting his way and, despite his
27 current status as a fallen Hollywood heavy hitter, he still does not like it when
people say no to him, especially his wife.

1 14. Over the course of their marriage and more specifically during the past
2 three years in Los Angeles County, Adam abused Trina in every conceivable way.
3 He strangled her, punched her, kicked her and threw objects and food at her,
4 forcibly restrained her robbing her of her freedom of movement for the sole purpose
5 of continuing to abuse her, leaving her bloodied, bruised and physically and
6 emotionally scarred. In or about December 2019 while in Los Angeles County, he
7 admittedly drugged and sexually assaulted her and then smiled and laughed when
8 he told her what he had done to her once she regained consciousness. He screamed,
9 threatened to kill or otherwise harm her, insulted and belittled her, deprived her of
10 sleep (including insistently poking her in the ribs throughout the night as a form of
11 psychological torture), stalked and harassed her. He regularly pushed her out of
12 cars and abandoned her roadside or elsewhere. In an effort to keep this terrible
13 secret, he repeatedly told her no one would ever believe her if she dared tell anyone
14 what he had done to her. He further tried to discredit her by falsely telling her and
15 her friends and family that she was crazy, that she assaulted and/or attacked him
16 and/or their children, and that she tried to kill herself.

17 15. Despite Adam's efforts to destroy Trina's relationships and reputation
18 among her friends and family, he knew that wasn't enough to protect himself from
19 the consequences of all that he had done. This wasn't a simple he-said-she-said
20 situation. He knew damning evidence of his heinous abuse existed and he regularly
21 and systematically sought to find and destroy it. He regularly smashed, drowned (in
22 the ocean or pool) and/or stole Trina's electronic devices to remove and destroy
23 evidence of his horrific abuse. He and the third parties he hired monitored her and
24 hacked and hijacked her password-protected electronic devices (including access to
25 GPS tracking data) and iCloud which has not only jeopardized her safety and
26 privacy but also her ability to launch her new business online.

27 16. In one of his most diabolical schemes, Adam attacked Trina in their
28 Los Angeles home, at one point strangling her in part because he could not find her



1 phone. If strangling her wasn't enough, he also chest butted her, spat in her face,
2 pushed her down, grabbed her arm so tightly that he injured her and repeatedly used
3 force to restrain her and stop her from leaving their house. She fought him off as
4 long as she could. Knowing what Adam is capable of and the number of firearms
5 and ammunition Adam kept in their home, Trina was in fear for her life and her
6 children's lives. As Adam chased Trina around the house trying to find her phone,
7 he told her he was going to call the police and report *her* for domestic violence.
8 Just before the police arrived, he threw himself down in the hopes of manufacturing
9 an injury to support his concocted abuse claim. As the police arrived, Trina's phone
10 fell out of her blouse where she had been hiding it. Adam kicked it away from her
11 and into the garage where she could not immediately locate it. To Trina's horror,
12 the police believed Adam's fabricated story that Trina was the violent aggressor
13 and/or that she had tried to kill herself and as a result arrested her. Trina was taken
14 into custody, arrested for domestic violence and ultimately released the next
15 morning. That morning, Adam profusely apologized for having her falsely arrested
16 and admitted orally and in writing that he had concocted this plan to get her out of
17 the house so he could find and destroy evidence of his abuse from her phone and
18 computer. When she returned home, she found that photos and texts had in fact
19 been cleared from her computer and phone.

20 17. Days later, Adam wrote Trina letters professing his great remorse and
21 love and his motives for having her falsely arrested, namely to hurt and control her.

22 18. In or about the summer of 2020, Adam beat and choked Trina in their
23 Los Angeles home shortly before a family yacht trip, leaving her badly bruised.
24 While attacking her, Adam tried to wrestle Trina's phone away from her yet again.

25 19. In a textbook example of abuser behavior, Adam always expresses
26 remorse after attacking Trina. He love bombs her with expensive gifts, love letters
27 (even admitting in one letter in March 2021 that he is "often not in [his] right
mind") and promises to stop drinking alcohol and taking drugs, and go to rehab.

1 But his promises for change are quickly undermined by his next act of aggression
2 toward Trina.

3 20. In or about the latter part of 2020, Adam unexpectedly gifted Trina a
4 new phone that was already “all set up,” curiously without physical access to
5 Trina’s old phone which remained in her possession. Upon searching her digital
6 photo album, she discovered that photos of her prior injuries were now missing.

7 21. Due to her fear of continuing abuse, Trina was often forced to sleep
8 outside their bedroom or stay somewhere other than their marital home. Around
9 February 2021, Trina stayed at a hotel for six weeks in order to stay away from
10 Adam due to her fear of his domestic violence tendencies. Despite Adam’s frequent
11 insistence that Trina stay elsewhere, he continued to monitor, harass and stalk
12 Trina, even calling her as much as 35 times in a single day. During this same time
13 frame, Trina’s backup personal computer disappeared from her nightstand.

14 22. When Trina insisted that Adam leave their home on or about April 17,
15 2021, after a drunken incident the night before, Adam tried to hit Trina with his car
16 as he left their property. Apparently hearing the commotion, a neighbor called the
17 police resulting in the issuance of multiple police reports and an emergency
18 protective order against Adam and police confiscation of Adam’s numerous
19 firearms and ammunition.

20 23. In or about May 2021, while Trina’s electronic devices and iCloud
21 were repeatedly hacked and hijacked, Adam called Trina to ominously warn her
22 that he knew she had been talking to friends and that he knew more than she
23 thought he knew. During this same time, Trina received a DocuSign email
24 evidencing a signed document she did not sign.

25 24. When Trina did ultimately leave him, Adam candidly told her that she
26 should have left him sooner.

27 25. In yet another attempt to control Trina post-separation, Adam filed for
divorce (Los Angeles Superior Court Case No.: 21STFL03454) on or about March

1 30, 2021.

2 26. Sadly, Adam's abuse has continued even after their separation and
3 filing for divorce. In continuing fear for her safety, Trina sought and obtained a
4 temporary domestic violence restraining order against Adam in May 2021. The
5 evidence submitted with the restraining order application details numerous incidents
6 of domestic violence at Adam's hands and reflects that the Los Angeles Police
7 Department confiscated at least eight firearms and voluminous ammunition
8 belonging to Adam from the family's former residence on April 17, 2021. Adam's
9 cache of weapons and ammunition is a clear sign that he is also a dangerous gun
10 nut.

11 27. Thereafter, in a continuing effort to control the narrative surrounding
12 the violence in their relationship, Adam filed for his own domestic violence
13 restraining order against Trina on or about June 25, 2021 while he was in Hawai'i.
14 Leading coercive control experts consider the manipulation of the family court
15 system by abusers to continue to harm and punish their familial victims, a textbook
16 example of coercive control. In response to Adam's contrived efforts to block her
17 from their marital home, Trina sought another restraining order against Adam on or
18 about June 28, 2021, in large part to gain access to their marital home in Los
19 Angeles to care for their ill son while Adam remained in Hawai'i. However, given
20 Trina's desire to maintain some semblance of a relationship with Adam for the sake
21 of their children, both restraining orders were subsequently dropped.

22 28. Adam ultimately moved to Maui County, Hawai'i where he currently
23 resides but continues to exert coercive control over Trina through manipulation of
24 their community property assets including but not limited to cancelling her credit
25 cards and restricting her access to community funds, a continuing campaign to
26 destroy her relationships and reputation with her friends and family and monitoring
27 and surveilling her movements and electronic devices and communications. As a
28 result of Adam's continuing coercive control of Trina, she has and continues to

1 struggle to pay her daily living expenses including medical care and vital
2 prescription medication.

3 29. Adam's abuse of Trina has historically included habitual and systemic
4 financial and isolative control, employing classic behaviors such as threats,
5 humiliation and monitoring. The California Legislature recently amended Family
6 Code § 6320(c) to broaden its domestic violence protections to include coercive
7 control which it has defined as "a pattern of behavior that in purpose or effect
8 unreasonably interferes with a person's free will and personal liberty. Examples of
9 coercive control include, but are not limited to, unreasonably engaging in...
10 isolating the other party from friends, relatives, or other sources of support." This
11 lawsuit addresses *inter alia* this serious and prevalent issue which in large part has
12 been historically overlooked but is now gaining the attention of international
13 lawmakers, abuse experts and media. Coercive control laws have already been
14 enacted in Scotland, France, England, Wales, Ireland, Tasmania and Hawai'i.
15 Adam's long standing deprivation of financial and moral support from Trina is a
16 textbook example of coercive control which has and continues to severely impair
17 and impact her well-being and life span.

18 30. Adam's continuing post-separation abuse of Trina is a malignant
19 attempt to regain power and control of Trina that Adam is not able to let go of.

20 31. To be clear, the gravamen of the Complaint against Adam is statutory
21 domestic violence, and thus the continuing tort doctrine applies. *See Pugliese v.*
22 *Super. Ct.*, 146 Cal. App. 4th 1444 (2007). The Complaint and all causes of action
23 asserted herein are accordingly governed by the three-year statute of limitations set
24 forth in Cal. Civ. Proc. Code § 340.15(a).

25 **FIRST CLAIM FOR RELIEF**

26 **(Violation of Cal. Civ. Code § 1708.6 – Domestic Violence)**

27 32. Trina incorporates and realleges paragraphs 1 through 31 as if fully set
28 forth herein.



1 33. Adam intentionally and/or recklessly caused bodily injury or attempted
2 to cause bodily injury to Trina, asserted coercive control over her as defined and
3 codified by Cal. Family Code § 6320(c), and placed Trina in reasonable
4 apprehension of imminent bodily injury to herself.

5 34. The infliction of such injury on Trina, as set forth above, occurring
6 during the time the parties were either married, cohabitating or in a dating or
7 engagement relationship per Cal. Civ. Code § 1708.6.

8 35. As a direct and proximate result of Adam's conduct, as alleged herein,
9 Trina has suffered, and will continue to suffer the damages herein mentioned, in an
10 amount to be proven at trial, including attorneys' fees and costs.

11 **SECOND CLAIM FOR RELIEF**

12 **(Sexual Battery)**

13 36. Trina incorporates and realleges paragraphs 1 through 35 as if fully set
14 forth herein.

15 37. Adam's conduct in performing sexual acts on Trina against her will
16 and without her consent constitutes sexual battery.

17 38. Adam intended to cause and did cause harmful contact with Trina's
18 person.

19 39. Trina did not consent to Adam's harmful contact with her person.

20 40. As a direct and proximate result of the aforesaid acts of Adam, Trina
21 has suffered damages, all in amounts according to proof and in excess of the
22 jurisdictional minimum of this Court.

23 41. Adam performed the foregoing wrongful acts, conduct and omissions
24 intentionally, fraudulently, maliciously and oppressively in willful and conscious
25 disregard of Trina's rights and with the intent and design to damage Trina. By
26 reason thereof, Trina is entitled to recover punitive damages in an amount to be
27 determined at the time of trial.

1 **THIRD CLAIM FOR RELIEF**

2 **(Assault)**

3 42. Trina incorporates and realleges paragraphs 1 through 41 as if fully set
4 forth herein.

5 43. Adam acted in a manner such that he intended to cause a harmful
6 touching of Trina.

7 44. Adam touched and assaulted Trina in a harmful manner.

8 45. Trina did not consent to the assaultive conduct committed by Adam.

9 46. As a direct and proximate result of the aforesaid acts of Adam, Trina
10 has suffered bodily injuries, severe emotional and mental distress and anguish.

11 47. As a direct and proximate result of the aforesaid acts of Adam, Trina
12 has suffered damages, all in amounts according to proof and in excess of the
13 minimum jurisdiction of this Court.

14 48. Adam performed the foregoing wrongful acts, conduct and omissions
15 intentionally, fraudulently, maliciously and oppressively in willful and conscious
16 disregard of Trina's rights and with the intent and design to damage Trina. By
17 reason thereof, Trina is entitled to recover punitive damages in an amount to be
18 determined at the time of trial.

19 **FOURTH CLAIM FOR RELIEF**

20 **(Battery)**

21 49. Trina incorporates and realleges paragraphs 1 through 48 as if fully set
22 forth herein.

23 50. Adam touched and/or caused Trina to be touched with the intent to
24 harm or offend her.

25 51. Trina did not consent to Adam's harmful contact of her person.

26 52. Trina was harmed and/or offended by Adam's conduct.

27 53. A reasonable person in Trina's situation would have been offended by
28 the touching.

1 **SIXTH CLAIM FOR RELIEF**

2 **(Defamation)**

3 64. Trina incorporates and realleges paragraphs 1 through 63 as if fully set
4 forth herein.

5 65. At all times herein, Adam recklessly and intentionally caused
6 unsolicited publications of defamation, of and concerning Trina, to third persons
7 which were reasonably understood to refer to Trina. Those third persons to whom
8 Adam published this defamation are believed to include, but are not limited to,
9 Trina’s children, family, friends, and police officers.

10 66. At all times herein, these false and defamatory statements included
11 express accusations that Trina tried to kill herself, attacked and/or assaulted Adam
12 and/or their children including but not limited to telling Trina’s father that she put a
13 knife to the neck of an immediate family member. Without question, these types of
14 defamatory statements have a natural tendency to injure or cause Trina special
15 damages.

16 67. At all times herein, Adam’s statements were defamatory insofar as they
17 falsely stated that Trina committed serious crimes. Adam’s defamatory statements
18 are of the type that are defamatory on their face and therefore constitute libel per se.

19 68. As a result of Adam’s conduct, Trina has suffered harm including but
20 not limited to her reputation, career, lost income, shame, mortification, and legal
21 expenses to defend herself against Adam’s false statements.

22 69. At all times herein, Trina is informed, believes and fears that these
23 defamatory statements will continue to be published by Adam and will be re-
24 published by their recipients, all to the ongoing harm and injury to Trina’s personal
25 and professional reputation.

26 70. At all times herein, the defamatory meaning of all the above-described,
27 false and defamatory statements and their reference to Trina was understood as
28 assertions of fact, and not as opinion.

1 reasonable person to suffer substantial emotional distress, and in fact did cause
2 Trina substantial emotional distress.

3 80. As a result of Adam's conduct, Trina reasonably feared for her safety
4 or that of an immediate family member and/or suffered substantial emotional
5 distress that a reasonable person would experience.

6 81. Adam made credible threats, in person, by phone and/or in writing,
7 with either the intent to place Trina in reasonable fear for her own safety
8 and/or reckless disregard for Trina's safety and persisted in a pattern of conduct
9 despite at least one clear and definitive demand by Trina to cease and abate such
10 conduct.

11 82. As a direct and proximate result of the aforesaid acts of Adam, Trina
12 has suffered damages, all in amounts according to proof and in excess of the
13 jurisdictional minimum of this Court.

14 83. Adam performed the foregoing wrongful acts, conduct and omissions
15 intentionally, maliciously and oppressively in willful and conscious disregard of
16 Trina's rights and with the intent and design to damage Trina. By reason thereof,
17 Trina is entitled to recover punitive damages in an amount to be determined at the
18 time of trial.

19 84. For such current and future wrongful conduct by Adam, while certain
20 to inflict serious harm to Trina, there exists no adequate remedy at law. Therefore,
21 Trina is further entitled to preliminary and permanent injunctive relief against
22 Adam to prohibit such certain harm.

23 85. Trina therefore requests additional relief as set forth in the Prayer for
24 Relief herein.

25 **EIGHTH CLAIM FOR RELIEF**

26 **(Intrusion into Private Affairs)**

27 86. Trina incorporates and realleges paragraphs 1 through 85 as if fully set
28 forth herein.



1 87. Trina had an objectively reasonable expectation of privacy in the place,
2 conversation or matter intruded upon including but not limited to her personal
3 password-protected phones, computers, emails, text messages, voicemails, and
4 iCloud.

5 88. Trina is informed and believes, and based thereon alleges, that Adam
6 himself, or third parties hired by Adam, monitored, hacked, and surveilled Trina's
7 personal GPS tracking data, emails, text messages, voicemails, and iCloud,
8 repeatedly changing the log in credentials and locking her out of said accounts and
9 surreptitiously and illegally recorded and eavesdropped on Trina, thereby requiring
10 her to hire multiple technology information professionals to diagnose the cyber
11 attacks and attempt, albeit, unsuccessfully to remedy the situation.

12 89. Adam penetrated the zone of physical and/or sensory privacy and/or
13 obtained unwanted access to data by electronic or other covert means, in violation
14 of the law or social norms.

15 90. Adam intended to commit said acts that invade Trina's privacy.

16 91. Said intrusion occurred in such a manner that it would be highly
17 offensive to a reasonable person and was highly offensive to Trina.

18 92. Adam's conduct was a substantial factor in bringing about the invasion
19 of Trina's privacy right and her resulting harm.

20 93. As a direct and proximate result of the aforesaid acts of Adam, Trina
21 has suffered damages, all in amounts according to proof and in excess of the
22 jurisdictional minimum of this Court.

23 94. Adam performed the foregoing wrongful acts, conduct and omissions
24 intentionally, maliciously and oppressively in willful and conscious disregard of
25 Trina's rights and with the intent and design to damage Trina. By reason thereof,
26 Trina is entitled to recover punitive damages in an amount to be determined at the
27 time of trial.

1 **NINTH CLAIM FOR RELIEF**

2 **(Intentional Infliction of Emotional Distress)**

3 95. Trina incorporates and realleges paragraphs 1 through 94 as if fully set
4 forth herein.

5 96. The conduct of Adam as alleged above was at all times extreme and
6 outrageous and carried out by Adam with an intention to cause Trina emotional
7 distress and/or with reckless disregard of the probability of causing emotional
8 distress to Trina.

9 97. As a result of the conduct of Adam, as alleged herein, including but not
10 limited to domestic violence, sexual battery, assault, battery, and coercive control,
11 Trina has suffered severe emotional distress and suffering.

12 98. As a direct and proximate result of the aforesaid acts of Adam, Trina
13 has suffered damages, all in amounts according to proof and in excess of the
14 jurisdictional minimum of this Court.

15 99. Adam performed the foregoing wrongful acts, conduct and omissions
16 intentionally, fraudulently, maliciously and oppressively in willful and conscious
17 disregard of Trina's rights and with the intent and design to damage Trina. By
18 reason thereof, Trina is entitled to recover punitive damages in an amount to be
19 determined at the time of trial.

20 **PRAYER FOR RELIEF**

21 **WHEREFORE**, Trina prays for judgment against Adam as set forth below:

- 22 1. For compensatory damages according to proof;
- 23 2. For exemplary and/or punitive damages as permitted by law;
- 24 3. On the Sixth Claim for Relief for Defamation and the Seventh Claim
25 for Relief for Violation of Cal. Civ. Code § 1708.7 – Civil Stalking, for
26 equitable/injunctive relief including, without limitation, an order (1) requiring
27 Adam to desist from any publication referencing Trina or any defamatory
statements regarding Trina, (2) prohibiting Adam from recording, surveilling and/or

1 eavesdropping on Trina, and (3) prohibiting Adam from surveilling, hacking, and/or
2 mirroring Trina’s electronic devices, iCloud, and communications;

- 3 4. For attorneys’ fees and costs of suit herein; and,
- 4 5. For such other and further relief as the court may deem just and proper.

5
6 Respectfully submitted,

7 Dated: June 26, 2022

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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11 By: _____
12 Devin A. McRae
13 Lisa L. Boswell
14 Brett G. Moore
15 Attorneys for Plaintiff
16 TRINA VENIT

17 **DEMAND FOR JURY TRIAL**

18 Plaintiff Trina Venit hereby demands trial by jury for all issues so triable.

19 Respectfully submitted,

20 Dated: June 26, 2022

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

21
22 

23 By: _____
24 Devin A. McRae
25 Lisa L. Boswell
26 Brett G. Moore
27 Attorneys for Plaintiff
28 TRINA VENIT