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30-2025-01499696-CU-DF-CJC - ROA # 77 - DAVID H. YAMASAKI, Clerk of the Court By M. Diaz, Deputy Clerk.

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In pro per

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE (CJC)

JACKY LEE

Plaintiff,

vs.

YALING ZHOU, TRUSTEE OF THE YALING FAMILY TRUST DATED JUNE 15, 2023; YINGZI PENG aka ANNA PENG ; LEI ZHANG aka ELLEN ZHANG; NA ZHENG aka VANESSA ZHENG; AND DOES 4-10

Defendants

Case No.: 30-2025-01499696-CU-DF-CJC
(UNLIMITED CIVIL CASE)

THIRD AMENDED COMPLAINT FOR DAMAGES (Filed pursuant to Court Order):

1. **Trespass**
2. **Invasion of Privacy - Intrusion Upon Seclusion**
3. **Invasion of Privacy – Public Disclosure of Private Facts**
4. **Defamation (Unprivileged statements)**
5. **Intentional Infliction of Emotional Distress**
6. **Violation of California Civil Code §1708.8**

DEMAND FOR JURY TRIAL

Plaintiff JACKY LEE alleges as follows:

PARTIES

1. Plaintiff Jacky Lee is, and at all relevant times was, a resident of the City of Lake Forest, County of Orange, State of California.

2. Defendant Yaling Zhou, is sued herein in her capacity as Trustee of the Yaling Family Trust dated June 15, 2023. Plaintiff is informed and believes, and on that basis alleges, that the Trust's legal home is located in Orange County, California, and governed by California law.

3. Defendant YINGZI PENG aka "ANNA PENG" is an individual residing and doing business in Orange County, California.

4. Defendant LEI ZHANG aka "ELLEN ZHANG" is an individual residing and doing business in Orange County, California.

5. Defendant NA ZHENG aka "VANESSA ZHENG" is an individual residing and doing business in Orange County, California.

6. Plaintiff is ignorant of the true name of Defendants DOES 4-10, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and thereon alleges that each of the fictitiously named Defendants is responsible in some manner for the occurrence herein alleged, and that plaintiff's injuries and damages as herein alleged were proximately caused by their conduct. Each Defendant is sued in both individual and official capacities if applicable.

7. At all relevant times, each Defendant was the agent, employee, co-conspirator, or joint participant of the others, acting within the course and scope of such relationship, and each Defendant ratified the conduct of the others.

JURISDICTION AND VENUE

8. Jurisdiction is proper in this Court because Defendant, as Trustee, conducts business and owns real property in the State of California.

9. All defendants are tied to Orange County, which supports venue.

FACTUAL ALLEGATIONS

10. Defendant Yaling Zhou, Trustee of the Yaling Family Trust dated June 15, 2023, was the former landlord of Plaintiff Jacky Lee and his family. Hereinafter, Defendant Yaling Zhou, Trustee of the Yaling Family Trust dated June 15, 2023, will be referred to as "Defendant Yaling Zhou Trustee."

11. Defendants Yingzi Peng (aka "Anna Peng"), Lei Zhang (aka "Ellen Zhang"), and Na Zheng (aka "Vanessa Zheng") are all licensed real estate agents registered in the State of California.

12. Among them, Defendant Yingzi Peng (aka "Anna Peng") acted as the real estate agent who facilitated the execution of the residential lease agreement between Plaintiff Jacky Lee and Defendant Yaling Zhou Trustee.

13. On or about August 2, 2024, without Plaintiff's consent or permission, Defendant Yaling Zhou Trustee unlawfully entered Plaintiff's residence, which Plaintiff was renting from Defendant Yaling Zhou Trustee.

14. Accompanying Defendant Yaling Zhou Trustee during the unlawful entry into Plaintiff Jacky Lee's residence were Defendants Yingzi Peng (aka "Anna Peng"), Lei Zhang (aka "Ellen Zhang"), and Na Zheng (aka "Vanessa Zheng"), along with other unidentified individuals.

15. At the time of the incident, Plaintiff was accompanying his wife and two minor children to a medical appointment. During the outing, Plaintiff received a phone call from Defendant Yaling Zhou Trustee, which revealed that she had unlawfully entered Plaintiff's residence without notice or consent. Plaintiff was shocked and deeply disturbed by the unauthorized entry. As a result, he immediately canceled the scheduled appointment, returned home with his family, and reported the incident to law enforcement while en route.

16. While awaiting the arrival of the police, Defendants—once again without obtaining consent from Plaintiff or his family—proceeded to record video footage of Plaintiff's family members, constituting a serious and unlawful invasion of their privacy.

17. During that unauthorized entry, Defendants accessed, reviewed, and photographed Plaintiff's personal and confidential documents, including materials prepared for reporting violations to government agencies, all of which had been placed together on the kitchen island, making it easily accessible to the Defendants.

18. The police were called and removed all Defendants and the others from Plaintiff's residence.

19. As a result of the defendants' unlawful entry into Plaintiff's residence, they obtained a substantial amount of private and confidential information concerning Plaintiff and Plaintiff's family, which they later widely disseminated on the internet.

20. In or about July 2025, Defendants conducted doxxing-type searches and identified all residential addresses where Plaintiff had lived since 2014, including addresses in the City of Eastvale and the City of Rancho Cucamonga, as well as other cities within Riverside County and San Bernardino County.

21. Plaintiff resided in the City of Eastvale from approximately 2016 through the end of 2020. Due to the COVID-19 pandemic, Plaintiff was unable to timely pay rent beginning around March 2020 and accumulated approximately six months of unpaid rent. Plaintiff was ultimately removed from the residence by law enforcement at or about the end of 2020, by a default judgment Unlawful Detainer.

22. After the 2020 eviction, plaintiff lived in the City of Rancho Cucamonga for approximately one and a half years. During that time, a continuously leaking hot-water pipe caused Plaintiff's monthly gas bill to increase to approximately $700–$800, and the monthly water bill also rose to several hundred dollars. Plaintiff and the prior landlord

resolved the matter through agreement, allowing several months of reduced or unpaid rent as compensation to offset the rental amount.

23. Defendants publicized these past events about Plaintiff on the internet and told their online followers that Plaintiff was a repeat offender or habitual wrongdoer, which statements were false, misleading, and damaging to Plaintiff's reputation.

24. Defendants also publicly named and shamed Plaintiff online, questioning why Plaintiff did not continue living in cities within Riverside County or San Bernardino County and instead chose to reside in Irvine and Lake Forest.

25. Defendants published false, defamatory, and slanderous statements about Plaintiff on various online platforms, primarily Chinese social media sites such as Xiaohongshu and WeChat.

26. Defendants' publication of this material without consent is a clear violation of the privacy rights and may constitute a violation of California Civil Code § 1708.8 and other statutory protections.

27. Defendants repeatedly and persistently telephoned Plaintiff, stating that because the master bedroom lights in Plaintiff's residence remained on every night and numerous packages in the yard were covered with tarps, then later Defendants publicly alleged online that Plaintiff was cultivating marijuana inside the house.

28. On or about July 1, 2025, Defendant Yaling Zhou, as Trustee, together with several other defendants, demanded that Plaintiff pay monthly rent in the amount of $9,000 rather than the $6,300 monthly rent required under the parties' lease agreement.

29. This incident occurred in the HOA community meeting room where Plaintiff resided at the time. Defendant YINGZI PENG's husband was the President of the HOA, which contributed to the coercive and intimidating nature of the demand.

30. The demanded rent increase was not a lawful contractual demand but was conditioned on silence and avoidance of reputational harm.

31. Plaintiff is informed and believes that Defendant Yaling Zhou, as Trustee, maintained a personal relationship with Benjamin Yu, a City Councilmember in Lake Forest. Plaintiff is further informed and believes that Mr. Yu is a military veteran with an extensive network of associates within the veteran community.

32. In a particularly threatening act, Defendants orchestrated a visit to Plaintiff's residence by an unidentified individual dressed in military-style attire, who stated that he was there to "do a collection." The individual's language, appearance, and demeanor conveyed a professional and implicitly threatening message that would cause a reasonable person to feel intimidated and threatened.

33. Without Plaintiff's authorization, Defendants provided Plaintiff's full profile information to Chinese-language news outlets in the United States and caused them to publish a defamatory article about Plaintiff. Furthermore, the Defendants threatened to contact all of Plaintiff's relatives and friends and to call television stations unless rent in the amount of $9,000 per month was paid, instead of the $6,300 per month as stated in the lease agreement.

34. Without Plaintiff's authorization, Defendants disclosed Plaintiff's personal background information to a Chinese-language media outlet in the United States known as Kim's Chinese Broadcasting Channel. This disclosure occurred outside of any judicial proceeding and was not made in connection with any protected petitioning activity. The disclosure was made for the purpose of publicly portraying Plaintiff in a false and misleading manner and exerting pressure upon Plaintiff through reputational harm.

35. Following Defendants' disclosure, Kim's Chinese Broadcasting Channel attempted to involve itself in the related unlawful detainer matter by submitting Judicial Council Forms MC-510 and MC-500. The Court rejected those submissions. Plaintiff's claims, however, are based solely on Defendants' extra-judicial disclosure of private

information and their efforts to generate public and media pressure, not on any protected court filings.

36. On or about June 26, 2025, Defendant Yaling Zhou Trustee publicly stated that the fair rental value of the property was $9,000 per month, despite the lease stating $6,300.Furthermore, Defendant Yaling Zhou Trustee arranged three witnesses to publicly testify in support of her claim that the fair rental value of the property was $9,000 per month instead of the $6,300 per month as stated in the lease agreement. Defendant Yingzi Peng and Defendant Lei Zhang were among those witnesses.

37. Defendants expressly conditioned their agreement to cease defamatory publications and reputational attacks on Plaintiff's payment of $9,000 per month instead of $6,300.

38. Plaintiff's claims arise from conduct occurring outside any judicial proceeding, including trespass, unlawful recording, doxxing, defamatory online publication, and threats.

39. The Defendants' conduct has substantially harmed the Plaintiff's physical health, financial stability, and employment opportunities, driving the Plaintiff's entire family into extreme hardship. The Plaintiff's two minor children have also been subjected to malicious online attacks perpetrated by the Defendants. Furthermore, certain infringing acts are ongoing and continue to cause harm.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

Trespass

(against all Defendants)

40. Plaintiff incorporates by reference all paragraphs of this complaint as though fully set forth herein.

41. Defendants entered Plaintiff's residence without Plaintiff's knowledge or consent.

42. Such unauthorized entry constitutes trespass under California law.

43. Under California law, trespass occurs when a person intentionally enters another's property without permission or legal authority. (Civic Western Corp. v. Zila Industries, Inc., 66 Cal.App.3d 1 (1977)).

44. Plaintiff suffered damages as a direct and proximate result of Defendants' conduct.

SECOND CAUSE OF ACTION

Invasion of Privacy – Intrusion Upon Seclusion

(against all Defendants)

45. Plaintiff incorporates by reference all paragraphs of this complaint as though fully set forth herein.

46. Defendants' unauthorized entry, and their accessing, reviewing, and photographing of Plaintiff's confidential documents, constitute a highly offensive intrusion into Plaintiff's private affairs.

47. During the unauthorized entry, Defendants, without obtaining consent from Plaintiff or any member of his family, recorded video footage of Plaintiff's family members, thereby committing a serious and unlawful invasion of their privacy. Such conduct constitutes an actionable intrusion upon seclusion under California common law, which protects against intentional intrusions into one's private space, solitude, or affairs that would be highly offensive to a reasonable person. (See Shulman v. Group W Productions, Inc. (1998) 18 Cal.4th 200, 231 ["The intrusion tort... encompasses unconsented physical intrusion into the home or other private place"]; Sanders v. American Broadcasting Companies, Inc. (1999) 20 Cal.4th 907, 914–915.)

48. Furthermore, such acts violate the California Constitution, Article I, Section 1, which explicitly guarantees the right to privacy as an inalienable right of all Californians.

49. Plaintiff suffered damages as a direct and proximate result of Defendants' conduct.

THIRD CAUSE OF ACTION

Invasion of Privacy – Public Disclosure of Private Facts

(against all Defendants)

50. Plaintiff incorporates by reference all paragraphs of this complaint as though fully set forth herein.

51. Defendants published Plaintiff's prior eviction history, residential addresses, and family circumstances on publicly accessible platforms including Xiaohongshu and WeChat, where such content was viewable by thousands of users. These disclosures exposed Plaintiff's financial hardship and family life, including minor children, and would be highly offensive to a reasonable person

52. Defendants publicly disclosed private, sensitive information and images of Plaintiff without consent, causing emotional and psychological harm.

53. Defendant publicly disclosed private facts concerning Plaintiff, including personal living circumstances and alleged financial status, on internet-accessible platforms.

54. The disclosed facts were private, not of legitimate public concern, and highly offensive to a reasonable person.

55. Defendant's conduct was willful, malicious, and in conscious disregard of Plaintiff's rights. As a direct result, Plaintiff suffered emotional distress, anxiety, humiliation, reputational harm, and monetary damages.

56. Without Plaintiff's authorization, Defendants provided Plaintiff's personal background to Chinese-language news outlets in the United States in an attempt to secure misleading media coverage.

57. Defendants disclosed intimate family details and identifying information not contained in any public record.

58. Plaintiff has suffered a privacy tort. WHEREFORE, Plaintiff seeks damages according to proof.

FOURTH CAUSE OF ACTION

Defamation (Unprivileged Statements)

(against all Defendants)

59. Plaintiff incorporates by reference all paragraphs of this complaint as though fully set forth herein.

60. Defendants falsely stated that Plaintiff was a “habitual offender” and engaged in unlawful activity, including cultivating marijuana

61. On or about June, 2025, Defendants publicized these past events about Plaintiff on the internet and told their online followers that Plaintiff was a repeat offender or habitual wrongdoer, which statements were false, misleading, and damaging to Plaintiff’s reputation; The defendants keep saying that the plaintiff’s family are habitual offenders, but these claims are false. The real reasons were a burst hot water pipe in the house and the impact of COVID-19.

62. On or about June, 2025, Without Plaintiff’s authorization, Defendants provided Plaintiff’s full profile information to Chinese-language news outlets in the United States and caused them to publish a defamatory article about Plaintiff, the publications were made to third parties (A Chinese-language news outlets in the United States) and online audiences, Plaintiff suffered reputational injury, emotional distress, and damages.

63. In or about June 2025, Defendants published statements on Xiaohongshu asserting that Plaintiff was “growing marijuana inside the residence,” which was false. These statements were communicated to thousands of followers and republished by other users.

64. Plaintiff has never cultivated marijuana or engaged in any unlawful activity at the residence, and Defendants had no factual basis for such accusation. The foregoing statements constitute defamation per se in that they falsely accuse Plaintiff of criminal conduct and tend to injure Plaintiff in his occupation and reputation. As such, damages are presumed under California law.

65. Plaintiff suffered damages as a direct and proximate result of Defendants’ conduct. WHEREFORE, Plaintiff seeks general, special, and presumed damages.

FIFTH CAUSE OF ACTION

Intentional Infliction of Emotional Distress

(against all Defendants)

66. Plaintiff incorporates by reference all paragraphs of this complaint as though fully set forth herein.

67. On or about July 1, 2025, Defendant Yaling Zhou, as Trustee, together with several other defendants, demanded that Plaintiff pay monthly rent in the amount of $9,000 rather than the $6,300 monthly rent required under the parties' lease agreement. This incident took place in the meeting room of the HOA community.

68. The Defendants threatened to contact all of Plaintiff's relatives and friends and to call television stations unless rent in the amount of $9,000 per month was paid, instead of the $6,300 per month as stated in the lease agreement.

69. The demanded payment of $9,000 per month was not made through any lawful rent-increase procedure or eviction process, but was conditioned on Plaintiff's silence and Defendants' agreement to refrain from reputational and media attacks.

70. Defendants had no legitimate claim of right to the $9,000 demand and used threats of reputational harm as leverage. Defendants' threats were not made to pursue any lawful legal remedy but solely to obtain money through fear of reputational and personal harm.

71. Defendants expressly conditioned their agreement to cease defamatory publications and reputational attacks on Plaintiff's payment of $9,000 per month instead of $6,300. Plaintiff refused and suffered damages from the threat itself.

72. Defendants threatened to expose Plaintiff's private information and contact media outlets unless Plaintiff paid $9,000 per month, thereby attempting to obtain money through wrongful use of fear and reputational harm.

73. Plaintiff reasonably feared the threatened consequences, Defendant's threats were wrongful and constituted extortionate duress.

74. Defendants' threats, acts of extortion, defamation, and unlawful disclosure of Plaintiff personal information were extreme and outrageous, and were undertaken with the intent to cause, and did in fact cause, severe emotional distress to Plaintiff.

75. Defendants acted with the intent to cause severe emotional distress or with reckless disregard of the probability of causing such distress. As a direct and proximate result of Defendants' conduct, Plaintiff suffered severe emotional distress.

76. Defendants' conduct exceeded all bounds tolerated in a civilized society and was independent of any landlord-tenant dispute.

77. From June 2025 through the present, Defendants engaged in a continuous pattern of harassment, including repeated defamatory publications, threats to expose private information, and intimidation tactics involving third parties.

78. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered chronic insomnia, ongoing psychological distress requiring long-term reliance on medication, and substantial loss of employment and business opportunities.

79. As a result of Defendants' wrongful conduct, Plaintiff has suffered injury and emotional harm in an amount according to proof at trial.

80. Defendants' wrongful conduct was intentional, malicious, oppressive, fraudulent, and carried out with a conscious disregard for the rights and emotional well-being of Plaintiff. Plaintiff seeks an award of punitive and exemplary damages in an amount exceeding the minimum jurisdictional limits of this Court, according to proof at trial.

SIXTH CAUSE OF ACTION

Violation of California Civil Code §1708.8

(against all Defendants)

81. Plaintiff incorporates by reference all paragraphs of this complaint as though fully set forth herein.

82. Invasion of Privacy – Misappropriation and Dissemination of Private Information.

83. Plaintiff had a reasonable expectation of privacy within the residence, Plaintiff and his family were engaged in private, personal activities within the home at the time of the recording.

84. Defendants used video-recording devices, including mobile phones, to capture images and recordings inside the residence.

85. Defendants acted with the intent to capture images for dissemination to a broad audience.

86. Defendant knowingly entered onto or into the private area of Plaintiff's residence and captured or attempted to capture images, recordings, or observations of Plaintiff engaging in personal and private activities.

87. Defendants used mobile recording devices to capture images and video within Plaintiff's private residence without consent, a location where Plaintiff had a reasonable expectation of privacy.

88. Defendants unlawfully entered Plaintiff's residence without consent and obtained private materials, including photographs and personally identifiable information of Plaintiff. Defendants subsequently and willfully disseminated these materials on public online platforms with the intent to cause Plaintiff emotional distress and reputational harm, in direct violation of California Civil Code § 1708.8(b) and (d).

89. Defendants' actions were undertaken with malice, oppression, and a conscious disregard for the rights and emotional well-being of Plaintiff. Their conduct constitutes a direct violation of California Civil Code § 1708.8(d), which prohibits the constructive invasion of privacy by means such as unauthorized surveillance or recording without consent. As a direct and proximate result of Defendants' misconduct, Plaintiff suffered substantial emotional distress, humiliation, and a profound disruption of personal life. Pursuant to § 1708.8(d), Plaintiff respectfully seeks statutory, actual, and punitive damages according to proof, together with civil penalties and any other relief the Court deems just and proper.

90. In addition to statutory damages, Plaintiff is entitled to recover actual damages, general damages, and punitive damages under § 1708.8(d). Actual damages include, but are not limited to, expenses and losses incurred as a result of Defendants' conduct, as well as harm to Plaintiff's emotional and psychological health. General damages are appropriate to compensate for pain, suffering, loss of dignity, and emotional trauma. Punitive damages are warranted due to the willful, malicious, and oppressive nature of

Defendants' conduct and are necessary to punish the Defendants and deter similar misconduct in the future.

PRAYER

Plaintiff respectfully prays for judgment against Defendants as follows:

1. A permanent injunction prohibiting Defendants from publishing, republishing, or distributing Plaintiff's private information, images, recordings, or defamatory statements;
2. For general damages in an amount according to proof at trial;
3. For Special damages in an amount according to proof at trial;
4. For Statutory damages in an amount according to proof at trial;
5. Punitive and exemplary damages in an amount according to proof at trial;
6. Declaratory relief as appropriate;
7. Costs of suit incurred herein;
8. Reasonable attorney's fees where authorized by statute or contract;
9. Any other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL: Plaintiff hereby demands a trial by jury on all issues.

Dated: July 15, 2026

Respectfully submitted, By: *Jacky Lee*
JACKY LEE
In pro per