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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

RAQUEL LEE BOLLEAU,

Plaintiff,

vs.

THE WALT DISNEY COMPANY,

Defendant.

Case No.

**COMPLAINT SEEKING
DAMAGES**

1. Negligence/Negligence Per Se
2. Negligent Hiring, Supervision, and Retention
3. Premises Liability

JURY TRIAL DEMANDED

**TRIGGER WARNING:
THIS DOCUMENT CONTAINS HIGHLY GRAPHIC INFORMATION OF A
SEXUAL NATURE, INCLUDING SEXUAL ASSAULT**

PRELIMINARY STATEMENT

1. Plaintiff Raquel Lee Bolleau is a former child actress whose burgeoning stardom reached new heights in 2001 when she earned a leading role in the Disney Channel Original Movie, “The Poof Point.”

2. Ms. Bolleau had dreamed of becoming an actress ever since she was a young child, and her career held great promise.

3. As of 2001, Ms. Bolleau was a bright, optimistic, healthy, inspired, 14-year-old child actress who had already developed a positive reputation for her strong work ethic, preparation, and dedication. Ms. Bolleau had also earned roles in UPN’s “Malcolm & Eddie,” Nickelodeon’s “The Amanda Show,” and Nickelodeon’s “Double Dare 2000,” as well as a voice-over role in Disney’s “The Proud Family.” A photograph of Ms. Bolleau, formerly known as “Raquel Lee,” from “The Amanda Show” when she was approximately 13 years old is depicted below:



1 4. Ms. Bolleau was thrilled to join Disney in its first movie featuring a
2 Black-American family.

3 5. Working for Disney forever changed Ms. Bolleau’s life—but not in the
4 ways she had hoped.

5 6. John Doe (“Mr. Doe”), an on-set, adult, middle-aged, male employee
6 of Disney who was involved in the filming of the movie, repeatedly raped, sexually
7 assaulted, sexually abused, and sexually harassed Ms. Bolleau while filming
8 Disney’s “The Poof Point.” He supplied her with alcohol and pressured her to
9 consume it. He violated Ms. Bolleau for weeks. Mr. Doe was significantly older
10 than Ms. Bolleau, who was a child.

11 7. After raping and sexually assaulting Ms. Bolleau when she was 14
12 years old, Mr. Doe told her the following: “You’re old enough. You can handle it.”

13 8. Mr. Doe’s sexual abuse of Ms. Bolleau was apparent to the adults on
14 Disney’s set.

15 9. Defendant Disney repeatedly failed Ms. Bolleau.

16 10. Disney facilitated and concealed Mr. Doe’s severe sexual abuse of
17 Ms. Bolleau.

18 11. Disney’s set was not safe for children.

19 12. This is not the first time that Disney has enabled a sexual predator to
20 target and abuse vulnerable victims.

21 13. Disney has a longstanding and horrifying history of protecting sexual
22 abusers that began well before 2001—and continued after 2001.

23 14. Disney has caused irreparable and devastating harm, and must be held
24 accountable.

25 15. Overnight, Ms. Bolleau transformed from an energetic, bright, and
26 diligent child actress who overprepared and studied her lines—to an exhausted,

1 intoxicated, unwell child who could not focus, could not memorize her lines, smelled
2 of alcohol, and was routinely sick or vomiting on set.

3 16. Ms. Bolleau prayed that someone on set would help her—but not a
4 single adult acknowledged the abuse or tried to help her.

5 17. Disney failed to take any action to protect Ms. Bolleau from Mr. Doe’s
6 repeated rape, sexual assault, sexual abuse, and sexual harassment.

7 18. Indeed, neither Disney nor its executives and employees took any
8 action to ensure that the set of “The Poof Point” was safe for children.

9 19. After employing a pedophile in connection with a movie for children,
10 Disney repeatedly failed to protect Ms. Bolleau from Mr. Doe’s repeated rapes,
11 sexual assault, sexual abuse, and sexual harassment.

12 20. Instead, Disney took steps to facilitate and conceal Mr. Doe’s abuse.
13 For example:

14 a. At every turn, Disney displayed egregious negligence and willful
15 violations of child labor laws intended to protect children from the very abuse
16 suffered. Disney did not provide Ms. Bolleau with adequate time to find an
17 appropriate guardian, dismissed Ms. Bolleau’s first guardian for unspecified reasons,
18 and isolated and excluded her second guardian from set. Disney systematically
19 violated child labor laws, separating Ms. Bolleau from her guardian for the vast
20 majority of each day, and authorizing and directing minors to interact with adults
21 outside of the presence—or “sight and sound”—of their guardians. In violating child
22 labor laws, Disney gave Mr. Doe, a child predator, unrestricted and dangerous access
23 to a minor.

24 b. Disney failed to provide safe and appropriate hotel
25 accommodations for Ms. Bolleau, separating Ms. Bolleau from her guardian
26 overnight instead of providing a shared and/or adjoining accommodation.

1 c. Disney also separated children from their guardians during
2 travel, including flights, which enabled Mr. Doe to sit next to Ms. Bolleau and
3 sexually assault and abuse her on the flight to California—up until the time they
4 deboarded the plane.

5 d. Disney directed Ms. Bolleau to build a relationship and spend
6 time with Mr. Doe, a child rapist and sexual predator. In fact, “The Poof Point’s
7 director, Neal Israel, and Disney’s dialogue coach, Troy Rowland, directed Ms.
8 Bolleau to “bond” with, get close to, and trust Mr. Doe.

9 e. Disney authorized sexual harassment on set, permitting
10 sexualized jokes, commentary, fondling, and excessive touching.

11 f. On set, Mr. Doe regularly fondled and excessively touched Ms.
12 Bolleau, often rubbing his genitals on Ms. Bolleau while giving her unsolicited hugs.
13 No one from Disney stopped this extremely inappropriate touching and molestation
14 of a child.

15 g. Mr. Doe regularly made sexually explicit jokes and commentary
16 on the set of a children’s movie and around children. No one from Disney even
17 attempted to curb Mr. Doe’s inappropriate and sexualized commentary.

18 h. Mr. Doe made sexually explicit comments about Ms. Bolleau’s
19 body, including in the presence of other adults, such as Mr. Rowland. Instead of
20 reporting the comment or taking steps to ensure Ms. Bolleau’s safety, Mr. Rowland
21 joined Mr. Doe’s sexual harassment, laughing with Mr. Doe.

22 i. Mr. Rowland discussed the sex life of another Disney child
23 actress with Ms. Bolleau, advising Ms. Bolleau that this actress was also 14 and
24 sexually active, and that sex was normal for successful child actresses.

25 j. Mr. Doe regularly whispered sexually explicit and harassing
26 comments into Ms. Bolleau’s ear while on set and used hugs to get close to her. For

1 example, Mr. Doe would torment Ms. Bolleau by whispering comments like, “last
2 night was so good,” and “see you later.” Even though Mr. Doe’s sexual harassment
3 was in plain view of the cast and crew and could be heard by the sound technicians
4 managing the cast’s microphones, no one at Disney intervened.

5 k. Mr. Doe’s abuse devastated Ms. Bolleau and severely impacted
6 her physically, professionally, and emotionally. On set, Ms. Bolleau’s demeanor,
7 mood, behavior, performance, alcohol consumption, and physical and mental health
8 changed dramatically. She was exhausted, and often intoxicated, hungover, or
9 vomiting on set. In stark contrast to her performance prior to the abuse, in which
10 she meticulously memorized her lines, Ms. Bolleau had difficulty focusing during
11 filming and often could not remember her lines.

12 l. Disney failed to provide medical care to Ms. Bolleau on set when
13 she was sick and vomiting. Such medical care would have plainly led to questions
14 about how and where Ms. Bolleau consumed alcohol, which would have revealed
15 Mr. Doe’s sexual abuse and mandated reporting by the medical provider.

16 m. Disney recognized Ms. Bolleau’s sudden shift in demeanor and
17 performance—clear indicia of child sexual abuse—and attacked, blamed, and
18 threatened Ms. Bolleau, a child victim of rape, and Ms. Bolleau’s mother (“Ms.
19 Bolleau’s Mother”). Disney told Ms. Bolleau that they were “extremely upset” with
20 her performance. Multiple Disney executives attacked Ms. Bolleau’s changed
21 behavior and trauma response, and accused her of, among other things, being “out
22 of control,” causing the movie to go “haywire,” “need[ing] Jesus,” having “a demon
23 inside her,” and engaging in sex acts with a member of the crew at the age of 14.
24 Disney threatened to, and did, cancel Ms. Bolleau’s role in a forthcoming Disney
25 production.

21. Disney’s egregious role in Mr. Doe’s abuse of Ms. Bolleau is part of a broader, institutional, and systemic pattern of institutional and individual failures at Disney that extends far beyond “The Poof Point.”

22. For decades, Disney has been protecting and empowering sexual predators and enabling powerful and influential men to rape, sexually assault, control, and severely harm women and children. For example:

11 a. For years, Disney and its executives permitted, facilitated, and
12 actively concealed the rape, sexual assault, sexual abuse, sexual harassment, and
13 misconduct of Harvey Weinstein.

b. In 1997, Disney employed Brian Peck as an acting and dialogue coach on “Boy Meets World,” received complaints about his grooming of boys for sexual abuse, and failed to take any action. Mr. Peck went on to work for Nickelodeon, where he severely sexually abused, assaulted, and raped a child actor, Jared Drake Bell, for years. After Mr. Peck was convicted of sexually abusing Mr. Bell, in 2005, Disney rehired Mr. Peck—a convicted and dangerous pedophile and registered sex offender—to work on a children’s television program after he was released from prison.

c. Disney has a “child-predator problem.” Many of its child stars have reported severe misconduct on Disney sets, including rape, sexual assault, and sexual abuse, including Jordan Pruitt, Demi Lovato, and Ricky Garcia. Many Disney executives, employees, and associates have also engaged in sexual

1 misconduct, including Victor Salva, Martin Weiss, David Neuman, Michael Laney,
2 and Kyle Massey.

3 23. After filming “The Poof Point,” Ms. Bolleau returned home devastated,
4 unwell physically and mentally, and forever changed.

5 24. Ms. Bolleau gave up her dream of becoming an actress, and for the last
6 25 years, Ms. Bolleau has struggled with the severe trauma, pain, and distress of
7 Mr. Doe’s horrific abuse, and Disney’s many failures.

8 25. Disney’s and Mr. Doe’s severe misconduct have caused irreparable and
9 lasting harm.

10 26. Disney must be held accountable.

11 **ADMINISTRATIVE PREREQUISITES**

12 27. Plaintiff will file a complaint with the California Civil Rights
13 Department (“CRD”), pursuant to § 12900 et seq. of the California Government
14 Code, alleging claims under the California Fair Employment and Housing Act
15 (“FEHA”). Upon the conclusion of the administrative proceedings and Plaintiff’s
16 receipt of a Right to Sue letter, Plaintiff will seek leave to amend this Complaint to
17 add claims for discrimination and retaliation under FEHA.

18 28. Plaintiff has complied with any and all other prerequisites to filing this
19 action.

20 **JURISDICTION**

21 29. This Court has jurisdiction pursuant to Code Civ. Proc., § 410.10.
22 Plaintiff seeks damages under the statutory and common law of the State of
23 California.

24 30. Venue is proper in this Court pursuant to Cal. Code Civ. Proc. §§ 395
25 and 395.5 because Defendant is a corporation whose principal place of business is
26 situated in the County of Los Angeles, at least one of the assaults upon Plaintiff

1 occurred in the County of Los Angeles, and the contract between Plaintiff and
2 Defendant referenced herein was made in the County of Los Angeles.

3 **PARTIES**

4 31. Plaintiff Raquel Lee Bolleau is an adult citizen and is domiciled in Los
5 Angeles, California.

6 32. Ms. Bolleau is a lifelong California resident.

7 33. Defendant The Walt Disney Company is a media and entertainment
8 conglomerate, and it is one of the most influential and well-known entertainment
9 brands in the world, particularly for children's and family programming.

10 34. As of 2026, Defendant was listed on the Fortune 500 as the 44th largest
11 company in the United States by revenue.

12 35. Defendant was founded in or about 1923 as an animation studio and
13 previously operated under the names "Walt Disney Studio" and "Walt Disney
14 Productions." It debuted the comic strip, "Mickey Mouse," which later inspired
15 "The Mickey Mouse Club," a variety television show that aired intermittently from
16 approximately 1955 to 1996, featuring predominantly child performers.

17 36. Defendant operates the largest television and film studio in Hollywood,
18 California, Walt Disney Studios, which includes Walt Disney Pictures, Walt Disney
19 Animation Studios, Pixar, Marvel Studios, 20th Century Studios, 20th Century
20 Animation, and Searchlight Pictures.

21 37. Defendant acquired The American Broadcasting Company ("ABC"), a
22 commercial broad television and radio network, in or about 1996. Defendant
23 operates ABC television network, other media and entertainment business units, and
24 other cable television networks, including Disney Channel, ESPN, Freeform, FX,
25 and National Geographic.

FACTUAL ALLEGATIONS

I. AT AGE 14, MS. BOLLEAU LANDS HER DREAM ROLE ON DISNEY’S “THE POOF POINT”

41. Ms. Bolleau is a lifelong California resident.

42. Ever since she was a young child, Ms. Bolleau dreamed of becoming an actress—and she devoted much of her childhood to fulfill this dream.

43. At the age of three, Ms. Bolleau told her mother that it was her dream to be on television.

44. As a young child actor, Ms. Bolleau participated in acting classes and took advantage of every potential acting opportunity that came her way. She began shooting commercials, and she quickly gained a reputation for her dedication, preparation, and studiousness with respect to the craft of acting—even as a child.

45. In or about 1997, at the age of 10, Ms. Bolleau earned her first significant role on the UPN television sitcom, “Malcolm & Eddie,” starring actor Malcolm-Jamal Warner of “The Cosby Show.”

46. In or about 1999, at the age of 12, Ms. Bolleau earned a coveted spot on the first season of Nickelodeon’s “The Amanda Show,” a children’s comedy and variety television series starring Amanda Bynes. This role catapulted Ms. Bolleau’s

1 career and reputation as a promising child actor to new heights, and she began
2 auditioning for numerous projects.

3 47. In or about early 2001, Ms. Bolleau was invited to audition for a leading
4 role in an upcoming Disney Channel Original Movie (“DCOM”), “The Poof Point.”

5 48. Ms. Bolleau knew that this was a once-in-a-lifetime opportunity, and
6 that DCOMs were the launching pad for many successful child actors, including
7 Raven Symoné and Katherine Heigl.

8 49. Ms. Bolleau was also excited about the prospect of starring in Disney’s
9 first movie featuring a Black-American family. Ms. Bolleau auditioned for the part
10 of “Marie Ballard,” the teenage daughter of two 40-year-old scientists, “Norton and
11 Marigold Ballard,” and the sister of “Edison Ballard.”

12 50. Ms. Bolleau auditioned for “The Poof Point” at Disney’s studios in
13 Burbank, California. The process took approximately one month and involved
14 approximately three separate in-person auditions, each of which occurred at
15 Disney’s studios in California.

16 51. A few days after the last audition, Ms. Bolleau received the call while
17 in California that would change her life: she was advised that she had landed the
18 role of “Marie Ballard” on Disney’s upcoming DCOM, “The Poof Point.”

19 52. Ms. Bolleau was thrilled.¹

20 53. Ms. Bolleau’s employment with Disney commenced while she was in
21 California.

22
23
24 ¹ At or about this time, also in or about 2001, Ms. Bolleau also earned the voice
25 role on Disney’s animated sitcom, “The Proud Family,” which premiered on the
26 Disney Channel in or about September 2001. Ms. Bolleau voiced the roles of “The
Gross Sisters” (*i.e.*, “Nubia Gross”).

54. Upon information and belief, Ms. Bolleau’s primary co-stars on “The Poof Point” each resided in California as of in or about 2001, and traveled to and from California to film “The Poof Point.”

55. Mr. Doe is a lifelong resident of California.

II. AT AGE 14, MS. BOLLEAU WAS RAPED, SEXUALLY ASSAULTED, SEXUALLY ABUSED, AND SEXUALLY HARASSED AS A CHILD ACTOR ON DISNEY’S “THE POOF POINT”

A. The Vulnerabilities Specific To Child Actors And The Laws Designed To Protect Them

56. Children—and child actors—are particularly vulnerable to exploitation and abuse.² The entertainment industry for adult actors involves the interplay of numerous power differentials, including those between employers and employees (*i.e.*, producers and actors). As non-adults, child actors are subjected to all of the power differentials navigated by adult actors. In addition, child actors are inherently beginning their careers (and lives), and are typically competing for opportunities to build their careers. Children, moreover, have varying levels of experience, cognitive development, familial resources, guidance, support, and judgment. For these and other reasons, state and other laws provide protections regulating the employment of children as actors.

² As a result of this exceptional vulnerability, the sexual abuse and exploitation of children is prevalent within the entertainment industry—so much so that in 2024, the United Nations Special Rapporteur on the sale, exploitation, and sexual abuse of children, presented a report on this issue to the United Nations Human Rights Council. *See* Mama Fatima Singhateh, United Nations Special Rapporteur, “Study on the sexual abuse and exploitation of children in the entertainment industry,” (Jan. 5, 2024), available at <https://docs.un.org/en/A/HRC/55/55> (last visited July 16, 2026).

1 57. The California State Legislature, for example, in recognizing the
2 significant vulnerabilities presented by children in the entertainment industry, has
3 enacted various laws designed to protect child actors. Specifically, under California
4 law as of at least in or about 1986:

5 a. In order to “employ minors in any such work or activity,” an
6 employer in the entertainment industry must ensure that the work “is not hazardous
7 or detrimental to the health, safety, morals or education of such minors.” 8 Cal.
8 Code. Regs. § 11751; *see generally* 8 Cal. Code. Regs. Ch. 2 (discussing California’s
9 child labor laws and protections for “Employment of Minors in the Entertainment
10 Industry”).

11 b. The employer must apply for and obtain an “Entertainment Work
12 Permit,” which permits the child actor to work “only under the conditions prescribed
13 [by law] and in conformity with all provisions of law governing the working hours,
14 health, safety, morals and other conditions of employment of minors.” *Id.* § 11753.

15 c. “A parent or guardian of a minor under sixteen (16) years of age
16 must be present with, and accompany, such minor on the set or location and be within
17 sight or sound of said minor at all times.” *Id.* § 11757.

18 d. Employers must provide a child actor with a “studio teacher on
19 each call for minors,” with the number of studio teachers per child actor depending
20 on the age of the child actor. *Id.* § 11755.2. All child actors must receive a certain
21 number of hours of schooling per day from the studio teacher. *Id.* § 11760(d)-(f).

22 e. Studio teachers, “in addition to teaching, shall also have the
23 responsibility for caring and attending to the health, safety and morals of” child
24 actors under the age of 16. *Id.* § 11755.3. “In the discharge of these responsibilities,
25 the studio teacher shall take cognizance of such factors as working conditions,
26 physical surroundings, signs of the minor’s mental and physical fatigue, and the

1 demands placed upon the minor in relation to the minor’s age, agility, strength and
2 stamina. The studio teacher may refuse to allow the engagement of a minor on a set
3 or location and may remove the minor therefrom, if in the judgment of the studio
4 teacher, conditions are such as to present a danger to the health, safety or morals of
5 the minor.” *Id.*

6 f. “No minor under the age of sixteen (16) may be sent to wardrobe,
7 make-up, hairdressing or employed in any manner unless under the general
8 supervision of a studio teacher.” *Id.* § 11762.

9 g. Child actors are only permitted to work a specific number of
10 hours based on their age. For example, minors who are under 16 years old but at
11 least 9 years old “may be permitted at the place of employment for a maximum of
12 nine (9) hours,” consisting of “not more than five (5) hours of work and at least three
13 (3) hours of schooling,” and “one (1) hour of rest and recreation.” *Id.* § 11760(e).
14 Minors who are under 18 years old but are at least 16 years old “may be permitted
15 at the place of employment for a maximum of ten (10) hours,” consisting of “not
16 more than six (6) hours of work and at least three (3) hours of schooling,” and “one
17 (1) hour of rest and recreation.” *Id.* § 11760(f); *see also* Cal. Lab. Law § 1391(1)
18 (restricting employers from employing a minor who is 15 years old or younger for
19 more than eight hours a day, more than 40 hours in one week, or before 7:00 a.m. or
20 after 7:00 p.m., except that from June 1 through Labor Day, the minor may work
21 until 9:00 p.m.); § 1391(2) (restricting employers from employing a minor who is
22 16 or 17 years old for more than eight hours a day, more than 48 hours a week, or
23 before 5:00 a.m. or after 10:00 p.m. on any day preceding a school day, and up until
24 12:30 a.m. on evenings preceding a non-school day).

25 58. Parents, guardians, and child actors rarely report or complain about
26 violations of child labor laws in the entertainment industry. Given the massive

1 power differentials between employers and employees, studios, producers, and
2 directors, and unestablished actors, and adults and children, child actors and their
3 guardians know that if they complain, the child actor's career and livelihood will
4 likely suffer. In other words, it is common knowledge that if a parent or guardian
5 makes trouble on set, there will likely be repercussions for the child actor, including
6 reduced professional opportunities. Parents, guardians, and child actors often do not
7 want to risk jeopardizing the child's acting career and the coveted opportunity to
8 obtain an acting role as a child. They do not want to be perceived as "overbearing"
9 or "demanding" parents. For these reasons, it is very rare for parents and guardians
10 of child actors to complain about violations of child labor laws in the entertainment
11 industry.

12 59. By statute, when minor residents of California are employed in the
13 entertainment industry by an employer located in California, California law must
14 apply. Specifically, Title 8 of the California Code of Regulations, Section 11756,
15 mandates:

16 When minors resident in the State of California and employed by an employer
17 in the entertainment industry located in the State of California, are taken from
18 the State of California to work on location in another state, as part of, and
19 pursuant to, contractual arrangements made in the State of California for their
20 employment in the entertainment industry, **the child labor laws of California
and the regulations based thereon shall be applicable.**

21 8 Cal. Code Regs. § 11756 (emphasis added). This provision was enacted in 1986,
22 15 years before the filming of "The Poof Point."

23 60. Furthermore, pursuant to a 2001 agreement between the Screen Actors
24 Guild ("SAG") and the Alliance of Motion Picture & Television Producers,
25 including Disney (the "SAG Agreement"), California law applies. See Alliance of
26 Motion Picture & Television Producers (AMPTP) and Screen Actors Guild, Inc.

(SAG), Codified Basic Agreement, July 2001, available at <https://ecommons.cornell.edu/entities/publication/ba8c66e9-eb15-4fba-8a9e-4b51a26dba36> (last visited July 27, 2026) (hereinafter “SAG Agreement” or “SAG Ag.”).

61. Under the SAG Agreement, “[i]t is recognized that when minors are employed in the State of California or taken from the State of California pursuant to a contractual arrangement made in the State of California, the applicable California laws and regulations shall regulate such employment.” SAG Ag. at 119. Although the Agreement’s effective date is July 1, 2001, “[t]he provisions of this Agreement with respect to, and only to, services rendered on or after the effective date hereof shall be deemed incorporated in all contracts of employment now in effect or hereafter into to which such provisions are applicable.” *Id.* Here, “The Poof Point” was released in September 2001, and so Ms. Bolleau’s employment with Disney continued through the effective date of the SAG Agreement.

B. Disney Directed Ms. Bolleau to “Bond” and Spend Time With Mr. Doe, A Child Rapist and Sexual Predator

62. In or about February 2001, the cast and crew of Disney’s “The Poof Point,” including Ms. Bolleau, flew from Los Angeles, California, to Salt Lake City, Utah, to film the movie.

63. At the time, Ms. Bolleau was only 14 years old. She was a bright, optimistic, diligent teenager who was excited about her future and elated to work for Disney.

64. Mr. Doe was middle-aged and much older than Ms. Bolleau.

65. As most of the cast and crew were residents of California, Disney paid for the cast and crew’s flights, hotel accommodations, and transportation while on location filming “The Poof Point.”

C. Mr. Doe Raped and Sexually Assaulted an Intoxicated and 14-Year-Old Ms. Bolleau at the Hotel Booked By Disney for Cast and Crew

73. Soon after filming for “The Poof Point” began, Mr. Doe invited Ms. Bolleau and her guardian (the “Guardian”) to his hotel room under the guise of practicing her lines.

74. In efforts to please Mr. Israel and Mr. Rowland and to follow their orders to spend time with and get close to Mr. Doe, Ms. Bolleau agreed.

75. As if to make the point that he was a well-connected and powerful person, Mr. Doe had also invited professional athlete John Smith (“Mr. Smith”), who was in town and staying at the same hotel, to join them. Mr. Smith was very well known and successful.

76. Once Ms. Bolleau and her Guardian arrived at Mr. Doe’s hotel room, Mr. Doe and Mr. Smith supplied them with alcohol. Mr. Doe pressured Ms. Bolleau to consume the alcohol even though she was only 14 years old, well below the legal drinking age of 21.

77. As a young teenager, Ms. Bolleau had never tried alcohol before. She became heavily intoxicated before leaving with her guardian to return to her hotel room.

78. Once Ms. Bolleau got back to her own hotel room, however, Mr. Doe called and demanded that she return to his hotel room alone.

79. Ms. Bolleau—like any other respectful and well-mannered child—followed the orders of her elder with whom she had been directed by Disney’s director and acting coach (also both adults) to trust and spend time. She went to Mr. Doe’s hotel room, even though she was intoxicated and not well.

1 80. Mr. Doe raped and sexually assaulted Ms. Bolleau that evening. He
2 was at least double her age.

3 81. Without a doubt, Ms. Bolleau could not and did not consent to engage
4 in any sex acts with Mr. Doe. She was a minor and she was intoxicated. She was
5 also a vulnerable child actor—away from home and the supervision and support of
6 her family, and trying to please the adults around her in order to succeed in the
7 entertainment industry.

8 82. Of the rape and sexual assaults, Mr. Doe told Ms. Bolleau, a 14-year-
9 old girl, the following: “You’re old enough. You can handle it.”

10 **D. Disney Blatantly Ignored Obvious Indicia of Child Sex Abuse—and**
11 **Instead Facilitated and Concealed Mr. Doe’s Abuse**

12 83. The following day, it would have been obvious to all adults on set that
13 something terribly wrong had happened.

14 84. Ms. Bolleau smelled like alcohol and spent the entire day vomiting on
15 set.

16 85. Multiple production members observed that Ms. Bolleau was sick and
17 intoxicated, and rhetorically asked her what was wrong and if she had been drinking.

18 86. It was evident to adults on set that something was wrong—yet no one
19 at Disney intervened.

20 87. No one inquired as to why she was drunk and vomiting.

21 88. Not a single adult asked who had unlawfully provided Ms. Bolleau with
22 alcohol or where she had consumed the alcohol.

23 89. Disney did not provide Ms. Bolleau with any medical care even though
24 she was sick. Indeed, if Ms. Bolleau had been provided with medical care, that
25 provider would have inquired as to where and how Ms. Bolleau, a 14-year-old,
26

1 became intoxicated. That inquiry would have revealed Mr. Doe’s provision of
2 alcohol to a minor and his rape and sexual assault of Ms. Bolleau.

3 90. Emboldened by the fact that no one did anything to intervene or protect
4 Ms. Bolleau, Mr. Doe began a pattern and practice of raping Ms. Bolleau regularly
5 while on location filming “The Poof Point.”

6 91. On many nights, Mr. Doe plied Ms. Bolleau with alcohol and forced
7 her to engage in sex acts with him.

8 92. Ms. Bolleau spent numerous nights while on location filming “The
9 Poof Point” in Mr. Doe’s hotel room, forced to have both vaginal and oral sex with
10 a much older man as a 14 year-old girl.

11 93. Although the vast majority of Disney’s cast and crew stayed at the same
12 hotel, no one reported Ms. Bolleau’s regular wandering of the hotel halls and lobby
13 on the way to and from Mr. Doe’s room.

14 94. Ms. Bolleau arrived on set each morning visibly disheveled—a stark
15 difference from the dedicated, studious, and diligent child actress who had joined
16 the movie.

17 95. Disney executives and employees knew that its 14-year-old child actor
18 was consuming alcohol and did nothing.

19 96. Unsurprisingly, Mr. Doe’s repeated rape, sexual assault, and sexual
20 abuse of Ms. Bolleau impacted filming because it severely impacted Ms. Bolleau
21 physically and emotionally.

22 97. At the start of filming, Ms. Bolleau studied the script every single night
23 and meticulously memorized her lines. She was always prepared and she was
24 singularly focused on performing her best each day.

25 98. Because of Mr. Doe’s severe sexual abuse and its impact on
26 Ms. Bolleau, Ms. Bolleau had difficulty memorizing her lines and focusing during

1 filming. Physically, she was exhausted, she was often intoxicated and/or hungover,
2 and she was sore from the sexual abuse she suffered. Mentally, she struggled to
3 process the abuse, she was afraid for her safety, and she had no one to turn to or trust.
4 She was devastated that not a single adult on Disney’s set tried to help her.

5 99. Disney recognized Ms. Bolleau’s sudden shift in demeanor and
6 performance—clear indicia of child sexual abuse—but instead of seeking to protect
7 and support its minor employee, Disney executives attacked and blamed Ms.
8 Bolleau.

9 100. Approximately one month into filming “The Poof Point,” an on-set
10 Disney executive called Ms. Bolleau’s agent and manager. Instead of expressing
11 concern for Ms. Bolleau, the Disney executive blamed Ms. Bolleau for causing the
12 film to go “haywire” and described Ms. Bolleau as “out of control.”

13 101. The executive also said that Ms. Bolleau’s team needed to “talk some
14 sense into her.”

15 102. The executive went on to say that “Disney was extremely upset” and
16 had decided to cancel her role in the new Disney production *Web Girl* because she
17 “was not performing.”

18 103. On another occasion, an on-set Disney executive producer (the
19 “Executive Producer”) called Ms. Bolleau’s Mother, accusing Ms. Bolleau of having
20 sex with a crew member, noting it was a widespread rumor on set.

21 104. The Executive Producer frequently told Ms. Bolleau, “you need Jesus,”
22 and even called Ms. Bolleau’s Mother. On the call, the Executive Producer did not
23 recommend that Ms. Bolleau’s Mother intervene or even fly to Utah—she simply
24 said, “your daughter has a demon inside her.”
25
26

1 singing coach. Ms. Bolleau's initial guardian traveled to and from California to
2 serve as her guardian on the set of Disney's "The Poof Point."

3 114. Ms. Bolleau's contract, which was signed in California, included a
4 stipend for her guardian, who received approximately \$1,000 dollars per week from
5 Ms. Bolleau's Mother.

6 115. After Ms. Bolleau identified an initial guardian to accompany her on
7 set, Disney expressed unspecified concerns about the guardian in order to get her
8 removed from set.

9 116. Specifically, at the start of filming, a Disney employee called
10 Ms. Bolleau's Mother, expressing vague concerns that Ms. Bolleau's first guardian
11 was an "opportunist" and "not a good fit." The Disney employee did not elaborate,
12 except to demand that Ms. Bolleau's Mother send another guardian for Ms. Bolleau.

13 117. During this guardian transition period, Ms. Bolleau was left on set
14 unaccompanied and unsupervised for at least one full day. Of course, this resulted
15 in another situation where Ms. Bolleau and her mother had insufficient time to find
16 a new set guardian.

17 118. During this guardian transition period, Ms. Bolleau's Mother traveled
18 to and from California to serve as Ms. Bolleau's guardian for a short time period
19 while Ms. Bolleau's Mother found a new guardian for Ms. Bolleau.

20 119. Ms. Bolleau's Mother ultimately found the Guardian, a family friend
21 who was 22 years old, to serve as Ms. Bolleau's new on-set guardian. The Guardian
22 did not have any prior experience as a guardian for child actors, but she was available
23 to promptly travel to Utah.

24 120. The Guardian traveled to and from California to serve as Ms. Bolleau's
25 guardian during Disney's filming of "The Poof Point."

1 121. Despite the Guardian’s clear lack of qualifications, Disney did not raise
2 any concerns to Ms. Bolleau’s Mother or provide the Guardian with any sort of
3 training or guidance.

4 122. Instead, Disney regularly and unlawfully separated Ms. Bolleau from
5 the Guardian.

6 123. In fact, for the vast majority of each day of filming, the Guardian was
7 not “within sight or sound” of Ms. Bolleau. Disney told the Guardian where she
8 could go, sit, and wait. The Guardian could not see Ms. Bolleau when she was on
9 set filming, she could not accompany Ms. Bolleau to wardrobe or makeup, and she
10 was rarely beside Ms. Bolleau.

11 124. The Guardian was also treated poorly by the Disney production team,
12 including the Executive Producer, in part because of her age and unfamiliarity with
13 the entertainment industry.

14 125. As there were no policies in place ensuring a minor’s guardian was the
15 decision-maker, Disney ignored the Guardian’s role and dealt with Ms. Bolleau
16 directly on all matters—treating a 14 year old as an adult while ignoring the adult
17 assigned to protect her.

18 126. Disney also failed to provide safe and appropriate accommodations for
19 child actors.

20 127. Disney failed to ensure that Ms. Bolleau was afforded adequate adult
21 support and supervision on location and at the hotel for Disney’s cast and crew.

22 128. Disney did not provide Ms. Bolleau and the Guardian with a shared
23 hotel room or adjoining rooms, forcing the Guardian to be further separated and
24 isolated from Ms. Bolleau.

25 129. The Guardian was habitually ostracized and intentionally separated
26 from Ms. Bolleau—in direct violation of California law.

1 130. The Disney production crew often told the Guardian that she did not
2 need to be present, at one point explicitly saying, “we do not even need you on set.”

3 131. Fearful of being considered a “problem” and fired like Ms. Bolleau’s
4 prior guardian, the Guardian was afraid to object to her separation from Ms. Bolleau.

5 132. Disney’s violation of child labor laws gave sexual predators like
6 Mr. Doe unrestricted access to minors like Ms. Bolleau. This access enabled
7 Mr. Doe to groom, harass, and relentlessly abuse Ms. Bolleau.

8 133. Ms. Bolleau was out of “sight and sound” of the Guardian, and had no
9 protection from Mr. Doe’s sexual harassment and abuse.

10 **F. Disney Authorized Sexual Harassment on the Set of “The Poof**
11 **Point”**

12 134. Disney permitted adults on the set of “The Poof Point,” including
13 Mr. Doe, to sexually harass minors on set.

14 135. For example, Mr. Doe regularly fondled and touched Ms. Bolleau’s
15 body excessively on set, running his hand along Ms. Bolleau’s arm as he walked by
16 or giving her unsolicited hugs. No one reported Mr. Doe’s behavior or even
17 attempted to stop him.

18 136. Mr. Doe often rubbed his genitals on Ms. Bolleau when giving her these
19 hugs.

20 137. Once again, no one from Disney thought to stop this extremely
21 inappropriate touching.

22 138. Mr. Doe also made sexually explicit comments about Ms. Bolleau’s
23 body and about his sexual abuse while on set.

24 139. On one of the many occasions when Mr. Rowland forced Ms. Bolleau
25 and Mr. Doe to spend time together, Mr. Doe made an inappropriate, sexual comment
26 about Ms. Bolleau’s body.

1 149. Mr. Doe also engaged in explicit sexual conversations while on set
2 without any limitation or recourse. In fact, Mr. Doe was known on set for making
3 sexually explicit “jokes” and comments that were entirely inappropriate for children.

4 150. Multiple witnesses recall Mr. Doe making inappropriate comments on
5 the set of “The Poof Point.”

6 151. In or about March 2001, the film wrapped shooting.

7 152. The film may have been over, but Ms. Bolleau was far from free from
8 Mr. Doe’s sexual assaults.

9 **G. Mr. Doe Sexually Assaulted Ms. Bolleau on the Flight Home to**
10 **California Booked and Purchased By Disney**

11 153. After wrapping, the cast and crew boarded a flight back to California.

12 154. Disney booked first class seats for certain individuals and booked the
13 rest of the crew in economy seating.

14 155. This preferential seating meant that Ms. Bolleau was alone in first class
15 with her guardian seated in economy.

16 156. On the flight, Mr. Doe demanded that Ms. Bolleau sit next to him and
17 bring a blanket to “cover them.”

18 157. Scared but thinking she was safe in the public setting, Ms. Bolleau
19 reluctantly agreed.

20 158. Mr. Doe then reached under her pants and sexually assaulted
21 Ms. Bolleau continuously during the flight.

22 159. Mr. Doe continued sexually assaulting Ms. Bolleau once the plane
23 landed in the Los Angeles International Airport—even up until their row began to
24 deboard the plane.

1 **III. DISNEY HAS A DECADES-LONG HISTORY OF FACILITATING**
2 **AND CONCEALING RAPE, SEXUAL ABUSE, SEXUAL**
3 **HARASSMENT, AND SEXUAL MISCONDUCT**

4 160. As of 2001, unbeknownst to Ms. Bolleau, Disney already had a
5 longstanding history of protecting and empowering sexual predators that began long
6 before she joined the cast of “The Poof Point” and continued long after.

7 161. Disney’s misconduct and egregious role in Mr. Doe’s rape, sexual
8 assault, and abuse of Ms. Bolleau is part of its broader, institutional, and systematic
9 pattern of empowering perpetrators of sexual abuse and enabling powerful and
10 influential men to rape, sexually assault, control, and severely harm women and
11 children. For example:

12 162. Disney and its executives permitted, facilitated, and actively concealed³
13 the rape, sexual assault, sexual abuse, sexual harassment, and misconduct of Harvey
14 Weinstein.⁴

15 ³ See, e.g., Tatiana Siegel, “Is Bob Iger the Hidden Hand Behind Disney and
16 China’s Relationship Warming,” *Variety* (Feb. 16, 2023), available at
17 [https://variety.com/2023/film/asia/bob-iger-hidden-hand-disney-china-relationship-
18 warming-avatar-2-1235524393/](https://variety.com/2023/film/asia/bob-iger-hidden-hand-disney-china-relationship-warming-avatar-2-1235524393/) (last visited July 14, 2026); Tatiana Siegel, “Harvey
19 Weinstein’s Youngest Accuser Speaks Out,” *Rolling Stone* (Aug. 11, 2022),
20 available at [https://www.rollingstone.com/culture/culture-features/harveyweinstein-
21 accuser-interview-youngest-kaja-soloka-1393654/](https://www.rollingstone.com/culture/culture-features/harveyweinstein-accuser-interview-youngest-kaja-soloka-1393654/) (last visited July 14, 2026); Anna
22 Menta, “Did Family-Friendly Disney Help Harvey Weinstein Get Away With
23 Alleged Assault?,” *Newsweek* (Dec. 6, 2017), available at
24 <https://www.newsweek.com/disney-helped-harvey-weinstein-740140> (last visited
25 July 14, 2026).

26 ⁴ Mr. Weinstein has been convicted of felony sex crimes in two separate
27 jurisdictions. In New York, he was initially convicted in February 2020 of third-
28 degree rape and first-degree criminal sexual act and sentenced to 23 years of
imprisonment. See *People v. Weinstein*, 42 N.Y.3d 439, 451 (2024). Ultimately,
the Court of Appeals overturned that conviction in April 2024 due to procedural
errors. See *id.* at 444-5. He was convicted on retrial in June 2025 on one count
involving a different complainant, acquitted on a second, and the third resulted in a

3 b. Many Disney executives knew or should have known of
4 Mr. Weinstein's dangerous propensities towards women, and instead of impeding his
5 misconduct, they enabled it.

c. For instance, Mr. Weinstein reported directly to Disney’s Chief Executive Officer, Michael Eisner (“Mr. Eisner”), who was aware of Mr. Weinstein’s pattern of misconduct towards women. Mr. Eisner delegated oversight of Mr. Weinstein to a number of Disney executives who did not properly supervise him. As a result, during the time Disney owned Miramax (from approximately 1993 to 2010), many high-level executives at Disney covered up and/or aided Mr. Weinstein’s sexual assaults and enabled Mr. Weinstein to sexually abuse countless victims over the course of many years, including Julia Ormond and Kaja Sokola.⁵

d. Irwin Reiter, Executive Vice President of Accounting and Financial Reporting for Miramax from 1989 to 2005, admitted that Mr. Weinstein’s “mistreatment of women” was an ongoing problem. (Sokola Compl. ¶ 68). Mr. Reiter discussed Mr. Weinstein’s pattern of sexual harassment and assaults of

0 mistrial that the New York County District Attorney's Office later declined to retry.
1 *See People v. Weinstein*, Ind. No. 2335/18, slip op. at 1-2 (N.Y. Sup. Ct. N.Y. Cty.
2 Jan. 8, 2026). In California, Weinstein was convicted in December 2022 of forcible
3 rape, forcible oral copulation, and sexual penetration by a foreign object. *See People*
4 *v. Weinstein*, No. B327696, 2026 WL 1847284, at *1 (Cal. Ct. App. 2d Dist. June
5 26, 2026). That conviction was affirmed on appeal in June 2026, though the sentence
6 was vacated and remanded for sentencing. *Id.* at *1, 49.

⁵ See *Ormond v. Weinstein et al.*, Index No. 952107/2023, Dkt. 1 (“Ormond Compl.”); *Sokola v. Weinstein et al.*, Index No. 950250/2019 (N.Y. Sup. Ct.), Dkt. 1 (“Sokola Compl.”).

1 women with other officers within Miramax, including Robert Weinstein. (*Id.* ¶ 69).
2 Mr. Reiter reviewed and handled payments to Mr. Weinstein’s victims from Miramax
3 funds, and caused Disney to contribute to those settlement payments. (*Id.* ¶ 70).

4 e. Nancy Ashbrooke, Vice President of Human Resources for
5 Miramax from 1991 to 2000, also knew of complaints about Mr. Weinstein’s sexual
6 misconduct and directly witnessed Weinstein’s sexual harassment of women. (*Id.*
7 ¶¶ 84-86).

8 f. Amy Israel, Miramax’s then Senior Vice President and Co-Head
9 of Acquisitions, was personally harassed by Mr. Weinstein. (Ormond Compl. ¶ 76).
10 In 1994, Ms. Israel stopped by Mr. Weinstein’s hotel room to pick him up for a film
11 festival screening. *Id.* Mr. Weinstein was nearly naked and asked her for a massage.
12 (*Id.*). Ms. Israel reported the incident to a more senior executive and was informed
13 that another of her colleagues had also been harassed by Mr. Weinstein. (*Id.*). Still,
14 the company took no action in response to her complaint.⁶ (*Id.*).

15 g. In 1994, Mia Kirshner was a 19-year-old actress who starred in
16 a film that had been distributed by Miramax. (*Id.* ¶ 69). Her agents at CAA had set
17 up a meeting between Ms. Kirshner and Weinstein at her hotel in New York to
18 discuss a potential new Miramax project. (*Id.*). *But* when Mr. Weinstein came to
19 her room, he told her that he wanted her to have sex with him in exchange for career
20 opportunities, which she declined to do. (*Id.*). Upset and scared, Ms. Kirshner
21 reported this blatant sexual harassment and misconduct to her primary agent at CAA,
22 but she was told that it was “pointless to do anything about it.” (*Id.*). This echoed
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25 ⁶ Megan Twohey, et al., “Weinstein’s Complicity Machine,” The New York
26 Times (Dec. 5, 2017), available at www.nytimes.com/interactive/2017/12/05/us/harvey-weinstein-complicity.html (last visited July 14, 2026).

1 the indifference and clear familiarity with Mr. Weinstein’s conduct exhibited by Ms.
2 Ormond’s CAA agents regarding his later sexual assault on her.

3 h. Mark Gill, the Head of Marketing in Miramax’s New York office
4 from approximately 1994 to 1997, witnessed Mr. Weinstein engage in sexually
5 inappropriate and harassing behavior and also received direct complaints from
6 women after Mr. Weinstein assaulted or harassed them. (Sokola Compl. ¶¶ 72, 74).

7 i. In or about 1990 or 1991, Sophie Morris, then a 19-year-old
8 intern for Miramax, was subject to unwelcome sexual advances and sexual contact
9 by Mr. Weinstein at the Savoy Hotel in London. (Ormond Compl. ¶ 75). Ms. Morris
10 was manning the phone in Mr. Weinstein’s suite when he called her into the
11 bathroom. Mr. Weinstein was naked in the bath and asked Ms. Morris to join him.
12 She said no and returned to the desk. Not long after, Mr. Weinstein called her again.
13 Ms. Morris found Mr. Weinstein naked on his bed. Mr. Weinstein then asked
14 Ms. Morris to give him a massage and promised that he would not ejaculate if she
15 did. Without Ms. Morris’s consent, Mr. Weinstein removed Ms. Morris’s shirt. Ms.
16 Morris reported these incidents to her supervisors at Miramax, as well as to the
17 police, but no action was taken.⁷

18 163. Disney productions even after “The Poof Point” have been plagued by
19 child predators and child sex abuse.

20 164. Shockingly, from 1997 to 1999, Disney employed a pedophile and child
21 sexual predator, Brian Peck, and later rehired and employed him from 2005 to 2007,
22 despite his convictions for child sex abuse.

23 _____
24 ⁷ Lisa O’Carroll, “Scotland Yard told of Harvey Weinstein sexual misconduct
25 in 1990s,” The Guardian (Oct. 31, 2017), available at
26 [www.theguardian.com/film/2017/oct/31/scotland-yard-told-of-harvey-weinstein-](http://www.theguardian.com/film/2017/oct/31/scotland-yard-told-of-harvey-weinstein-sexual-misconduct-in-1990s)
[sexual-misconduct-in-1990s](http://www.theguardian.com/film/2017/oct/31/scotland-yard-told-of-harvey-weinstein-sexual-misconduct-in-1990s) (last visited July 14, 2026).

1 a. Specifically, in or about 1997, Disney hired Mr. Peck, a child
2 acting and dialogue coach, on the Disney/ABC television show, “Boy Meets World.”

3 b. On “Boy Meets World,” at least one Disney director (then a stage
4 manager), Beth Correll, received reports that Mr. Peck appeared to be grooming
5 young boys on set so that he could sexually abuse them, that he was spending an
6 inordinate amount of time with child actors, including off-set, and that some children
7 returned to set with a strange affect after spending time with Mr. Peck.

8 c. Neither Beth Correll nor Disney took any action to protect the
9 children on the set of “Boy Meets World” or other child actors who would later work
10 with Mr. Peck.

11 d. In 2000, after “Boy Meets World,” Mr. Peck moved to
12 Nickelodeon’s “The Amanda Show,” where he worked as an acting coach.

13 e. Disney did not disclose the danger Mr. Peck posed to children to
14 Nickelodeon.

15 f. On “The Amanda Show,” Mr. Peck began severely sexually
16 abusing, assaulting, and raping a minor, 14-year-old child actor, Jared Drake Bell.
17 He abused Mr. Bell for years.

18 g. In 2004, Mr. Peck pleaded “no contest” to certain child sex abuse
19 offenses, including lewd acts upon a child 14 or 15 years of age and oral copulation
20 with a minor under 16 years of age, in connection with his severe, years’-long sexual
21 abuse of Mr. Bell. He was sentenced to 16 months’ imprisonment and ordered to
22 register as a sex offender.

23 h. At Mr. Peck’s sentencing, Richard and Beth Correll—both
24 Disney Channel directors⁸—shockingly submitted letters in support of Peck even

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26 ⁸ Richard Correll has directed numerous children’s television shows, including
27 various Disney productions, such as: “That’s So Raven,” “The Suite Life of Zack &
28

1 though: (1) Peck was convicted of child sex offenses; (2) they were submitting letters
2 in connection with Peck’s sentencing for these child sex offense convictions; (3)
3 Beth Correll had received reports of Peck’s serious misconduct on “Boy Meets
4 World”; and (4) Peck had a reputation for engaging in rampant sexually explicit and
5 inappropriate conduct with children, both on and off camera.

6 i. Astonishingly, in 2005, Disney—that is, the Corrells⁹—hired a
7 convicted pedophile and registered sex offender to work on “The Suite Life of Zack
8 & Cody,” a children’s television sitcom that aired from approximately 2005 to
9 2008.¹⁰

10 j. In 2024, after Mr. Bell spoke about Mr. Peck’s abuse in an HBO
11 documentary, “Quiet on Set: The Dark Side of Kids TV” (“Quiet on Set”), the
12 Corrells received backlash for their letters of support of a convicted pedophile and
13 their subsequent hiring of Mr. Peck. In response, the Corrells issued an apology, in
14

15 _____
16 Cody,” “Hannah Montana,” “Cory in the House,” “The Suite Life on Deck,” “I’m
17 in the Band,” “A.N.T. Farm,” “Jessie,” “Austin & Ally,” “Liv & Maddie,” “K.C.
18 Undercover,” “Bunk’d,” and “Raven’s Home.” He married Beth Correll in or about
2004. Beth Correll has worked as an assistant director on various children’s shows,
including Disney and Nickelodeon productions.

19 ⁹ Notably, in a series of interviews with the Directors Guild of America,
20 Richard Correll discussed his “30-year career,” primarily in children’s television,
21 and how to work with child actors. Correll described various vulnerabilities of child
22 actors, and methods to get child actors to take direction, and opined: “If they start to
23 feel comfortable with you, they’ll do anything you want.” Directors Guild of
24 America, “Virtual History with Rich Correll: On Working with Young Actors,”
available at <https://www.dga.org/Craft/VisualHistory/Interviews/Rich-Correll> (last
visited July 26, 2026).

25 ¹⁰ “The Suite Life of Zack & Cody: Brian Peck: Mirror,” IMDB, available at
26 https://www.imdb.com/title/tt0426371/characters/nm0669631/?ref=ttfc_fcr_3_48
(last visited July 15, 2026).

1 which they claimed that they did not know about Mr. Peck’s criminal conduct and
2 only “later learned” about Peck’s “horrible crime[s].”¹¹

3 k. In or about May 2026, Disney represented that they had
4 “guardrails” in place when they hired Mr. Peck in 2005. That is, according to Disney,
5 they hired Mr. Peck only to do “voice-over in studio,” where he did not engage with
6 any Disney employees, including minors, and worked in a building that was empty
7 when he was in it. Disney’s counsel explained that they had investigated Mr. Peck’s
8 employment after the release of “Quiet on Set.”

9 l. Disney’s explanation is directly contradicted by the Corrells’
10 statements that they did not know about Mr. Peck’s criminal conduct when Disney
11 hired him in 2005. Moreover, there is no conceivable justification for hiring a
12 convicted pedophile to work on a show involving and for children, regardless of
13 whether “guardrails” are put in place.

14 165. Disney has a “child-predator problem”¹² and many of its child stars
15 have discussed severe misconduct on Disney sets, including rape, abuse, and
16 pressure to engage in disordered eating.¹³ For example:

17 _____
18 ¹¹ Kalia Richardson, “Disney Channel Directors Apologize for Writing Letters
19 of Support Against Drake Bell’s Sexual Abuse Case,” Rolling Stone (Mar. 26,
20 2024), available at [https://www.rollingstone.com/tv-movies/tv-movie-news/disney-](https://www.rollingstone.com/tv-movies/tv-movie-news/disney-directors-apologize-letters-of-support-drake-bell-sexual-abuse-1234994715/)
21 [directors-apologize-letters-of-support-drake-bell-sexual-abuse-1234994715/](https://www.rollingstone.com/tv-movies/tv-movie-news/disney-directors-apologize-letters-of-support-drake-bell-sexual-abuse-1234994715/) (last
22 visited July 16, 2026).

23 ¹² Christopher F. Rufo, “Disney’s Child Predator Problem,” City Journal (Mar.
24 21, 2022), available at [https://www.city-journal.org/article/disneys-child-predator-](https://www.city-journal.org/article/disneys-child-predator-problem)
25 [problem](https://www.city-journal.org/article/disneys-child-predator-problem) (last visited July 15, 2026).

26 ¹³ Adrian Horton, “Demi Lovato says she was raped as a teenager by someone
27 she knew,” The Guardian (Mar. 16, 2021), available at
28 [https://www.theguardian.com/music/2021/](https://www.theguardian.com/music/2021/mar/16/demi-lovato-rape-youtube-docuseries-dancing-with-the-devil)
[mar/16/demi-lovato-rape-youtube-docuseries-dancing-with-the-devil](https://www.theguardian.com/music/2021/mar/16/demi-lovato-rape-youtube-docuseries-dancing-with-the-devil) (last visited
July 15, 2026) (hereinafter “Horton, The Guardian, 2021”); Andrea Insa Marco,”

1 a. In or about 1994, convicted child rapist Victor Salva was hired
2 to direct Disney’s movie, “Powder.”¹⁴

3 b. In or about 2005 to 2007, 14-year-old Disney singer Jordan Pruitt
4 was sexually abused by her manager for years. The manager was hired by Disney
5 and Disney forced Ms. Pruitt to work with him. Like Ms. Bolleau, Ms. Pruitt was
6 often left unsupervised with her manager.¹⁵

7 c. In or about the late 2000’s, 15-year-old Demi Lovato was raped
8 by another Disney actor. When Ms. Lovato reported it, Disney told her to keep
9 working, and later gave the rapist his own Disney Channel movie.¹⁶

10 d. In or about November 29, 2011, talent manager Martin Weiss,
11 who represented countless Disney child actors, was arrested for child sex abuse.¹⁷

12 _____
13 “Miley Cyrus, Demi Lovato,” and the dark side of the Disney Channel’s Golden
14 Age, El Pais, available at [https://english.elpais.com/people/2024-10-17/miley-](https://english.elpais.com/people/2024-10-17/miley-cyrus-demi-lovato-and-the-dark-side-of-the-disney-channels-golden-age.html)
15 [cyrus-demi-lovato-and-the-dark-side-of-the-disney-channels-golden-age.html](https://english.elpais.com/people/2024-10-17/miley-cyrus-demi-lovato-and-the-dark-side-of-the-disney-channels-golden-age.html) (last
visited July 15, 2026).

16 ¹⁴ Robert W. Welkos and Judy Brennan, “Dust Hasn’t Settled on ‘Powder’: Film
17 Draws Well Despite Molestation Controversy,” Los Angeles Times (Oct. 31, 1995),
18 available at [https://www.latimes.com/archives/la-xpm-1995-10-31-ca-63118-](https://www.latimes.com/archives/la-xpm-1995-10-31-ca-63118-story.html)
[story.html](https://www.latimes.com/archives/la-xpm-1995-10-31-ca-63118-story.html) (last visited July 15, 2026).

19 ¹⁵ Gene Maddaus and Shirley Halperin, “‘Voice’ Singer Files Sex Abuse Suit
20 Against Disney and Nashville Producer,” Variety (Sep. 3, 2019), available at
21 [https://variety.com/2019/biz](https://variety.com/2019/biz/news/voice-singer-sex-abuse-lawsuit-manager-jordan-pruitt-1203303543/)
[/news/voice-singer-sex-abuse-lawsuit-manager-jordan-pruitt-1203303543/](https://variety.com/2019/biz/news/voice-singer-sex-abuse-lawsuit-manager-jordan-pruitt-1203303543/) (last
visited July 15, 2026).

22 ¹⁶ See Horton, The Guardian, 2021; “Demi Lovato: Dancing with the Devil,”
23 YouTube Documentary (2021).

24 ¹⁷ “Youth Talent Manager Martin Weiss Pleads No Contest, Sentenced In
25 Molestation Case,” Deadline (Jun. 1, 2012), available at
26 [https://deadline.com/2012/06/youth-talent-manager-martin-weiss-pleads-no-](https://deadline.com/2012/06/youth-talent-manager-martin-weiss-pleads-no-contest-sentenced-in-molestation-case-280828/)
[contest-sentenced-in-molestation-case-280828/](https://deadline.com/2012/06/youth-talent-manager-martin-weiss-pleads-no-contest-sentenced-in-molestation-case-280828/) (last visited July 15, 2026).

1 e. In or about 2013 to 2017, 12-year-old Disney Channel star Ricky
2 Garcia was sexually abused by his talent manager for years, including while on
3 Disney sets.¹⁸

4 f. In or about April 21, 2014, former Disney Executive and
5 President of Disney Television, David Neuman, was accused of involvement in a
6 child sex ring.¹⁹

7 g. In or about December 13, 2018, an adult actor on the Disney
8 show, “Andi Mack,” was arrested for attempting to have a sexual relationship with
9 a 13 year old.²⁰

10 h. In or about June 17, 2019, former Disney Vice President, Michael
11 Laney, was convicted of sexual abuse of a seven year old. ²¹
12
13

14 ¹⁸ Rachel DeSantis, “Boy Band Member Sues Ex-Manager for Alleged Rape,
15 Claims Sexual Assault on ‘Almost Weekly Basis,” People.com (Sept. 11, 2019),
16 available at [https://people.com/music/forever-in-your-mind-band-member-sues-ex-
manager-rape-sexual-assault/](https://people.com/music/forever-in-your-mind-band-member-sues-ex-manager-rape-sexual-assault/) (last visited July 16, 2026).

17 ¹⁹ Sharon Waxman, “David Neuman Responds to Sex Ring Allegation:
18 ‘Monstrous, Utter, Outrageous Fiction’ (Exclusive),” Yahoo Entertainment (Apr.
19 25, 2014), available at [https://www.yahoo.com/entertainment/david-neuman-
responds-sex-ring-allegation-monstrous-utter-162900302.html](https://www.yahoo.com/entertainment/david-neuman-responds-sex-ring-allegation-monstrous-utter-162900302.html) (last visited July 15,
20 2026).

21 ²⁰ “Disney actor Stoney Westmoreland fired from ‘Andi Mack’ after arrest,”
22 CBS News (Dec. 15, 2018), available at [https://www.cbsnews.com/news/disney-
channel-actor-stoney-westmoreland-fired-andi-mack-after-arrest-today-2018-12-
23 15/](https://www.cbsnews.com/news/disney-channel-actor-stoney-westmoreland-fired-andi-mack-after-arrest-today-2018-12-15/) (last visited July 16, 2026).

24 ²¹ Brent Weisberg, “Michael Laney, 73, Sentenced To 81 Months In Prison For
25 Sexually Abusing Child - 06/17/19,” Multnomah Co. District Attorney’s Office
26 (Jun. 17, 2019), available at <https://flashalert.net/id/MultCoDA/125410> (last visited
July 15, 2026).

1 i. In or about June 14, 2021, former Disney star, Kyle Massey, was
2 charged with sending obscene material to a 13 year old.²²

3 j. In or about November 2019, multiple Disney World employees
4 were charged with possession of child pornography.²³

5 k. In or about May 2026, federal officials detained over two dozen
6 Disney cruise ship workers during a child sexual abuse material raid.²⁴

7 166. For many decades, Disney has continuously failed to protect its
8 employees from rape, sexual assault, sexual abuse, sexual harassment, and other
9 misconduct. It has actively concealed and enabled sexual predators at the expense
10 of countless victims. “The Poof Point” is one example of Disney’s decades-long,
11 unconscionable misconduct.

12 **IV. DISNEY’S AND MR. DOE’S MISCONDUCT HAVE CAUSED**
13 **IRREPARABLE HARM**

14 167. Ms. Bolleau’s life has been severely impacted and haunted on a daily
15 basis for the last 25 years because of Disney’s and Mr. Doe’s misconduct.
16
17

18 ²² Isabella Grullón Paz, “Former Disney Star Kyle Massey Charged With
19 Sending Explicit Messages to a Minor,” The New York Times (Jun. 30, 2021),
20 available at <https://www.nytimes.com/2021/06/30/arts/television/kyle-massey-photos-thats-so-raven.html> (last visited July 15, 2026).

21 ²³ “Disney employees, former assistant school principal arrested in child
22 pornography sting in Florida,” ABC News Australia (Nov. 9, 2019), available at
23 <https://www.abc.net.au/news/2019-11-10/disney-employees-former-principal-arrested-over-child-porn/11690648> (last visited July 15, 2026).

24 ²⁴ Anna Ashcraft, “Workers on several cruise ships, including Disney Magic,
25 detained in CSAM operation,” FOX 8 News (May 7, 2026), available at
26 <https://fox8.com/news/workers-on-several-cruise-ships-including-disney-magic-detained-in-csam-operation/> (last visited July 15, 2026).

1 168. What should have been one of the best experiences of her life turned
2 out to be a nightmare that had lasting repercussions.

3 169. Ms. Bolleau left home to join the cast of “The Poof Point” in 2001 as a
4 bright, optimistic, positive, healthy girl. When she returned, she was unwell,
5 destructive, and wholly unlike her former self.

6 170. Her life was forever changed.

7 171. After filming “The Poof Point,” Ms. Bolleau’s mental health rapidly
8 deteriorated.

9 172. In the years following Mr. Doe’s sexual abuse, Ms. Bolleau engaged in
10 significant self-harm and destruction to cope with the severe trauma.

11 173. Ms. Bolleau repeatedly ran away from home, abused drugs and alcohol,
12 had unhealthy relationships and suicidal ideations, and wanted to take her own life.

13 174. At one point, Ms. Bolleau was placed on a mental health hold and
14 institutionalized for mental health treatment.

15 175. Ms. Bolleau has suffered immense emotional and economic harm in
16 California over the past 25 years.

17 176. Even now, so many years later, medical records establish the severe and
18 longstanding impact of Mr. Doe’s sexual abuse.

19 177. Ms. Bolleau has been diagnosed with post-traumatic stress disorder
20 (“PTSD”), anxiety, and depression caused by the abuse she suffered while working
21 for Disney on “The Poof Point.” In addition, Disney’s conduct has had a lifelong
22 impact on Ms. Bolleau’s earning capacity.

23 178. Ms. Bolleau was a rising star with a promising acting career.

24 179. Disney’s and Mr. Doe’s misconduct have significantly impacted Ms.
25 Bolleau’s ability to work as an actress.

26

27

28

1 180. Upon returning from the filming of “The Poof Point,” Ms. Bolleau’s
2 mental and physical health deteriorated, and she lost both the ability to focus at work,
3 as well as the professional momentum she had generated prior to “The Poof Point.”

4 181. Ms. Bolleau had to give up her dream of becoming an actress. She had
5 to take time away from the entertainment industry because of, among other things,
6 her inability to trust those around her and the trauma of returning to a set.

7 182. The irreparable harm caused by Disney’s and Mr. Doe’s misconduct
8 cannot be overstated.

9 183. Mr. Doe’s repeated rape, sexual assault, sexual abuse, and sexual
10 harassment of Ms. Bolleau when she was 14 years old, and Disney’s facilitation and
11 concealment of the abuse, devastated Ms. Bolleau’s mental health and have forever
12 altered the course of Ms. Bolleau’s childhood and life.

13 184. Disney must be held accountable.

14 **FIRST CAUSE OF ACTION**
15 **NEGLIGENCE / NEGLIGENCE PER SE**

16 **Against Defendant Disney**

17 185. Plaintiff hereby incorporates by reference all prior allegations as if fully
18 set forth herein.

19 186. Defendant owed Plaintiff a duty of care arising from their contractual
20 and employment relationships.

21 187. Defendant, as an employer in the entertainment industry located in
22 California, had a duty to supervise Plaintiff, a minor resident of California employed
23 by Disney, including by creating and enforcing rules, policies, practices, and
24 trainings necessary for the protection of children in their care, including abiding by
25 8 Cal. Code. Regs. §§ 11751, 11756; *see also* SAG Ag. at 119.

1 188. At all relevant times, Plaintiff was a child under Defendant’s employ,
2 and Defendant had a special relationship with Plaintiff and owed Plaintiff a greater
3 duty of care because she was a child.

4 189. Defendant had a duty to have in place and enforce rules, policies,
5 practices, and trainings necessary for the protection of children in their care.

6 190. Defendant had a further duty to provide proper oversight and
7 supervision to avoid such abusive and harmful conduct as perpetrated by Mr. Doe,
8 who was enabled in carrying out such abuse by and through the negligence of
9 Defendant.

10 191. Defendant knew or should have known that Mr. Doe had a propensity
11 to sexually abuse and assault children with whom he worked.

12 192. Defendant knew or should have known that by directing Plaintiff to
13 spend more time with Mr. Doe, Plaintiff was at a heightened risk of being sexually
14 abused and assaulted by Mr. Doe.

15 193. Defendant breached its duty of care by allowing Plaintiff to be sexually
16 harassed and abused on Disney sets.

17 194. Defendant also breached its duty of care to Plaintiff by failing to
18 provide medical care to Plaintiff and failing to inquiry or investigate when Plaintiff’s
19 demeanor, mood, behavior, performance, alcohol consumption, and physical and
20 mental health dramatically changed.

21 195. Plaintiff is within the class of persons intended to be protected by these
22 laws, which were enacted to protect minors employed in the entertainment industry.

23 196. The harms suffered by Plaintiff—including rape, sexual abuse, and
24 sexual assault, and resulting physical and psychological injury—are the types of
25 harms these laws were designed to prevent.

1 197. As a direct and proximate result of the negligence and negligence per
2 se of Defendant, Plaintiff has suffered physical injury, severe mental and emotional
3 distress, humiliation, embarrassment, and economic harm.

4 198. Defendant carried out the conduct described above with malice,
5 oppression, and fraud, warranting exemplary damages.

6 199. At all relevant times, Defendant acted with conscious disregard of
7 Plaintiff's rights and feelings, and also acted with the knowledge of or with reckless
8 disregard for the fact that their conduct was certain to cause harm to Plaintiff.

9 200. Defendant violated 8 Cal. Code. Regs. §§ 11751, 11757, 11760, and
10 Cal. Lab. Law § 1391(1), by, including but not limited to, intentionally excluding
11 Plaintiff's guardian from set, instructing the guardian to leave set, separating
12 Plaintiff outside of the "sight and sound" of her guardian, and requiring Plaintiff to
13 work long hours and on evenings and weekends.

14 201. The violations were a substantial factor in bringing about the harm to
15 Plaintiff and constitute negligence per se.

16 202. As a direct and proximate result of the negligence of Defendant,
17 Plaintiff has suffered physical injury, severe mental and emotional distress,
18 humiliation, embarrassment, and economic harm.

19 203. The conduct described above by Defendant was willful, wanton, and
20 malicious. At all relevant times, Defendant acted with the knowledge of or with
21 reckless disregard for the fact that their conduct was certain to cause harm to
22 Plaintiff.

23 204. By virtue of the foregoing, Plaintiff is entitled to recover punitive and
24 exemplary damages from Defendant according to proof at trial.

SECOND CAUSE OF ACTION
NEGLIGENT HIRING, SUPERVISION, AND RETENTION

Against Defendant Disney

205. Plaintiff hereby incorporates by reference all prior allegations as if fully set forth herein.

206. By virtue of Plaintiff's special relationship with Defendant, and Defendant's relation to Mr. Doe, Defendant owed Plaintiff a duty to not hire and/or retain Mr. Doe, given his dangerous propensities, which Defendant knew or should have known about.

207. At no time during the period of time stated herein did Defendant have in place a reasonable system or procedure to timely and properly train, supervise and monitor its personnel, including Mr. Doe, to prevent the sexual abuse of children.

208. Defendant was aware, or should have been aware of, how vulnerable children are to sexual grooming and abuse by adults within the employ of Defendant prior and during Plaintiff's abuse by Mr. Doe.

209. Defendant failed to timely and properly investigate suspicious circumstances surrounding Plaintiff, including but not limited to her sudden shift in behavior and obvious alcohol consumption.

210. Defendant failed to use reasonable care in investigating the circumstances on set and did nothing to reasonably investigate, supervise or monitor and/or terminate Mr. Doe to ensure the safety of child actors.

211. As a direct and proximate result of Defendant's negligent hiring, supervision, and retention, Plaintiff has suffered physical injury, severe mental and emotional distress, humiliation, embarrassment, and economic harm.

212. The conduct described above by Defendant was willful and wanton. At all relevant times, Defendant acted with conscious disregard of Plaintiff's rights and

1 feelings, and also acted with the knowledge of or with reckless disregard for the fact
2 that its conduct was certain to cause harm to Plaintiff. By virtue of the foregoing,
3 Plaintiff is entitled to recover punitive and exemplary damages from Defendant
4 according to proof at trial.

5 **THIRD CAUSE OF ACTION**
6 **PREMISES LIABILITY**
7 **Against Defendant Disney**

8 213. Plaintiff hereby incorporates by reference all prior allegations as if fully
9 set forth herein.

10 214. Defendant owned, occupied and/or controlled the studio premises, and
11 had the right to manage and maintain the studio premises.

12 215. Defendant owed Plaintiff a duty of care to avoid exposing Plaintiff to
13 unreasonable risks of harm.

14 216. Defendant was negligent in the maintenance of the studio premises,
15 including in creating unpatrolled and un-surveilled spaces where sexual assaults
16 could easily occur.

17 217. As a direct and proximate result of Defendant's negligent management
18 of its property or properties, Plaintiff has suffered physical injury, severe mental and
19 emotional distress, humiliation, embarrassment, and economic harm.

20 218. The conduct described above by Defendant was willful, wanton, and
21 malicious. At all relevant times, Defendant acted with conscious disregard of
22 Plaintiff's rights and feelings, and also acted with the knowledge of or with reckless
23 disregard for the fact that its conduct was certain to cause harm to Plaintiff. By
24 virtue of the foregoing, Plaintiff is entitled to recover punitive and exemplary
25 damages from Defendant according to proof at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays judgment be entered in her favor against Defendant, and each of them, as follows:

A. For a money judgment representing compensatory damages including consequential damages, lost wages, earning, and all other sums of money, together with interest on these amounts, according to proof;

B. For a money judgment for mental pain and anguish and severe emotional distress, according to proof;

C. For punitive and exemplary damages according to proof;

D. For attorneys' fees and costs;

E. For prejudgment and post-judgment interest; and

F. For such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: August 21, 2026

Respectfully submitted,

WIGDOR LLP

By:



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