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17 SUPERIOR COURT OF THE STATE OF CALIFORNIA

18 COUNTY OF SAN MATEO

19 AMBER LAUREL BAPTISTE,

20 Plaintiff,

21 vs.

22 MICHAEL LEWIS GOGUEN and DOES 1
23 through 100 inclusive,

24 Defendants.

25 MICHAEL GOGUEN,

26 Cross-Complainant,

27 vs.

28 AMBER LAUREL BAPTISTE and ROES 1
through 10, inclusive,

Cross-Defendants.

ENDORSED FILED
SAN MATEO COUNTY

MAR 14 2016

Clerk of the Superior Court
By UNA FINAU
~~BOUYER~~

CASE NO. CIV 537691

**CROSS-COMPLAINT OF
DEFENDANT/CROSS-COMPLAINANT
MICHAEL GOGUEN AGAINST
PLAINTIFF/CROSS-DEFENDANT
AMBER BAPTISTE FOR:**

- (1) EXTORTION;
- (2) RESCISSION;
- (3) DECLARATION OF RELIEF;
- (4) BREACH OF CONTRACT;
- (5) CIVIL RESTRAINING ORDER; AND
- (6) INVASION OF PRIVACY

DEMAND FOR JURY TRIAL

Complaint Filed: March 8, 2016
[Signed via Facsimile]

1 Cross-Complainant Michael Goguen, by and through his attorneys, brings this Cross-
2 Complaint against Counter-Defendant Amber Laurel Baptiste for extortion, rescission, declaratory
3 relief, breach of contract, a restraining order, and invasion of privacy:

4 **INTRODUCTION**

5 1. Consumed by anger, obsession and jealousy that her decade-long, mutually
6 consensual love affair with Mr. Goguen had ended, Ms. Baptiste hatched a plan to get her
7 vengeance. She would make Mr. Goguen—one of Silicon Valley’s most prominent venture
8 capitalists and a prolific philanthropist—pay, both financially and emotionally. To accomplish
9 her scheme, Ms. Baptiste launched a campaign of harassment designed to inflict as much pain as
10 possible on Mr. Goguen and his family, including threatening to publicly accuse Mr. Goguen of
11 false, horrific acts unless he paid her \$40 million in hush money. Ms. Baptiste’s lawsuit filed on
12 March 8, 2016 is but the latest ploy in her scheme to shakedown Mr. Goguen for tens of millions
13 of dollars and punish him for rejecting her, all under the guise of a lawsuit designed to incite a
14 media firestorm, but shield Ms. Baptiste from a defamation claim.

15 2. Ms. Baptiste fabricated a tale that rewrote the history of a kind and mutually loving
16 relationship in the most opposite, horrible, and defamatory ways her angry imagination could
17 conceive—with allegations of rape (forcible sodomy that almost killed her); decade-long sexual,
18 physical and emotional abuse; that she was “rented” to Mr. Goguen by sex slave traffickers; that
19 she was starved and beaten by Mr. Goguen; that each encounter with Mr. Goguen was filled with
20 disgusting perversions; that she was a “teenager” when Mr. Goguen and she first met; and that Mr.
21 Goguen intentionally infected her with a sexually transmitted disease. None of that is true, as
22 documented unambiguously and consistently in the evidence of Ms. Baptiste’s own words in her
23 thousands of texts and emails sent to Mr. Goguen since they met in March of 2002 until the
24 extortionate threats were made in early 2014. Far from being a victim of any sort of abuse or
25 mistreatment of any kind, Ms. Baptiste fell deeply in love with Mr. Goguen directly because of his
26 kind, caring, and compassionate treatment of her at every moment of their relationship. Ms.
27 Baptiste ultimately wanted him to choose her as his life partner and father of her children. The
28 attached exhibit timeline of excerpts from Ms. Baptiste to Mr. Goguen spanning the duration of

1 their relationship, illustrate the extreme absurdity of each of the false and defamatory claims made
2 about Mr. Goguen, as well as Ms. Baptiste's motive behind them. (See Exhibit A.)

3 3. As just a small sampling, among the many thousands of emails and texts Ms.
4 Baptiste sent Mr. Goguen are the following showing that far from being a victim of abuse, Ms.
5 Baptiste repeatedly told Mr. Goguen how much she loved their every encounter:

- 6 • "The love that I hold in my heart for you was instant. It is a perfect love. And
7 to me it is the perfect way to love someone. It is forever and unconditional;"
- 8 • "I love our visits. I feel so blessed to have met you and have been able to
9 maintain a special relationship with you. I can only hope that it continues;"
- 10 • "I know it feels really good when we are together and to me it feels so perfect
11 and I never want to let go of you;"
- 12 • "I feel like it is the most perfect beautiful interactions two people could ever
13 experience;" and
- 14 • "I could never even make love to you enough times to show you how special
15 you are to me."

16 Far from being unable to tolerate Mr. Goguen's behavior, she called him by affectionate monikers
17 such as:

- 18 • "Prince Charming;"
- 19 • "My Sweet Sweet Sunshine;"
- 20 • "My Beautiful Love;"
- 21 • "[A]n Angel to my life"; and
- 22 • "[T]he most wonderful man in my whole world."

23 Far from being a sexual slave, Ms. Baptiste told Mr. Goguen how much she missed him when they
24 were apart and desired to see him again, with endearing phrases such as:

- 25 • "1 Million Kisses and Hugs Forever;"
- 26 • "You have got to be the sweetest man in the world. I can't wait to see you."
- 27 • "Miss you Bunches;"
- 28 • "I miss you and I hope you are well;" and

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- “Can’t wait to kiss you.”

Far from being the prey of a sexual predator, Ms. Baptiste sent Mr. Goguen hundreds of provocative photographs and erotic emails to seduce him, a sample of which follows:

- “I want you to feel comfortably [sic] sharing with me every fantasy you have ever had. When we come together I want it to be completley [sic] comfortable and relaxed and for exploration of all fantasy reality and erotica to take place wherever we decide that may be;”
- “Can’t wait for night 3 of our ardent liaison amoureuse:);”
- “I would like to move this sexual energy more often. And sexual energy equals creativity so the more amazing sex we have the more creative we will become;”
- “You can ask me to do anything with you I want you to experience anything that you have ever wanted to experience with me. I don’t want you to be shy;”
- “I don’t really require variety in hotels. I come there with one thought in mind which is making love to you;” and
- “I miss you so Much. My Body Misses you so Much. I love you so Much.”

Far from being “forcibly sodomized” and “left bleeding alone on the floor of a hotel room . . . nearly hemorrhaging to death,” the supposed anal tear was so minor that Mr. Goguen was unaware of it until Ms. Baptiste emailed him after the fact gushing about how wonderful the night was and noting that she was scheduled to have a “small surgery” that was “not a big deal.” She wrote of that night:

- “I would never erase that night for anything. It was beautiful each and every moment;”
- “The last night together was really incredible for me. I could feel so many things moving between us that I have not felt before. Hopefully I will feel you again soon;”
- “You do not have to feel bad at all. You only have to send me so many good thoughts and love via brain waives;” and

1 • “I promise promise it is not your fault...I was a willing participant to this
2 accident.”

3 Far from “avoiding her for months,” Mr. Goguen responded immediately expressing remorse that
4 she was hurt and providing enough money that she would have the best possible medical
5 treatment. In reality, the only thing that Ms. Baptiste was unhappy about with their relationship
6 was that Mr. Goguen did not requite her “forever” and “unconditional” love and did not want to
7 see her as much as she wanted to see him. Indeed, when Mr. Goguen attempted to break off their
8 relationship, Ms. Baptiste wrote that it “feels like I am dying knowing that I may never kiss you or
9 look into your beautiful brown eyes every [sic] again and it is torture.” Even after the supposed
10 decade of horrific abuse, purported forcible sodomy and abandonment in a foreign country, and
11 alleged intentional transmission of a STD, the only “problem” with their relationship, in
12 Ms. Baptiste’s own words, were that she “love[d Mr. Goguen] so much:” “Where you and I are
13 running into a problem is I love you so much. I still love spending time with you. I still love
14 every kiss you place on my body. I still love the inside of you with every fiber of my being.” As
15 a final plea, she tried to persuade him that: “Of course I feel you are better off if we are together
16 because the love in my heart for you is absolutely irreplaceable. . . . If you love me and you want
17 us to be together forever we can still have that. I told you I would stay beside you and love you
18 and love your children. . . . All of this writing and all I really would like to do is crawl into bed
19 beside you.”

20 4. These statements and hundreds of others like them put the lie to Ms. Baptiste’s
21 complaint filed in this lawsuit. In short, she is a woman scorned and, if she is a victim of
22 anything, it is of her own delusions.

23 5. Although Ms. Baptiste’s allegations are demonstrably false, they nevertheless had
24 their desired effect: the specter of public dissemination of these malicious accusations frightened
25 Mr. Goguen—not only for what they would do to his personal and professional reputation, but
26 also the devastation such allegations would wreak on his family. When faced with the false and
27 libelous claims she has now asserted in this lawsuit, Mr. Goguen wanted Ms. Baptiste to leave him
28 and his family alone, and felt that he had no choice but to pay her to accomplish this.

1 Mr. Goguen sought to reason with Ms. Baptiste, to no avail. She was steadfast that he agree to
2 pay her the full \$40 million that she was arbitrarily demanding, or else she would go public with
3 false and heinous claims of sexual assault and sexual exploitation. She would settle for nothing
4 less. After repeated pressure from Ms. Baptiste, and under the stress of her incessant and
5 relentless extortion and blackmail, Mr. Goguen acquiesced to her demands and signed a purported
6 “Settlement Agreement.” (Referred to hereafter as the “Extorted Agreement”).

7 6. Critically for Mr. Goguen, as a material part of the Extorted Agreement,
8 Ms. Baptiste promised to stay away from Mr. Goguen and stop her harassment. After Mr.
9 Goguen made the first of the four payments called for under the Extorted Agreement, for \$10
10 million, Ms. Baptiste resumed her campaign of harassment, sending thousands of text messages
11 *after* signing the document, including ones that disparaged Mr. Goguen and his family and
12 threatened to send him to jail unless he accelerated the payment schedule. Ms. Baptiste viciously
13 attacked Mr. Goguen’s wife with racist insults asserting that Ms. Baptiste was better than his wife.
14 Mr. Goguen repeatedly asked Ms. Baptiste to cease these incendiary communications. He told
15 her that she was materially breaching the Extorted Agreement. But Ms. Baptiste would not
16 relent. She continued to send false, vicious emails and, as she later admitted, secretly and
17 illegally tape recorded telephone conversations with Mr. Goguen, as part of her ongoing campaign
18 to make him pay. The peace from Ms. Baptiste that Mr. Goguen expected to secure by agreeing
19 to her extortionate demands was an illusion.

20 7. When Mr. Goguen realized that Ms. Baptiste had no intention of keeping her
21 promise to leave him in peace, he decided to take a stand and face her. Mr. Goguen informed
22 Ms. Baptiste that he would not make any further payments under the Extorted Agreement,
23 knowing that Ms. Baptiste would seek to destroy him, his career, and his family by taking her
24 false allegations public. Mr. Goguen has come to realize that keeping quiet and satisfying
25 Ms. Baptiste’s exorbitant financial demands will not stop her harassment, and he is willing to face
26 her and protect his family and his reputation.

27 8. But that decision is not without its consequences. Ms. Baptiste has now spun her
28 fabricated tale into the complaint filed in this action and, by doing so, has already accomplished

1 the first part of her plan—causing maximum harm to Mr. Goguen, knowing that her scandalous
2 and outrageous claims would be reported around the world. Ms. Baptiste’s blatant abuse of the
3 legal system has left Ms. Goguen with no choice but to answer her charges with specific facts of a
4 highly personal nature, precisely what he was seeking to avoid when he was extorted by
5 Ms. Baptiste nearly two years ago.

6 **PARTIES**

7 9. Cross-complainant Michael Goguen is an individual and resident of California.
8 Mr. Goguen is an accomplished professional and, until recently, a partner in one of the nation’s
9 premier venture capital firms. Mr. Goguen is also a prolific philanthropist who regularly donates
10 substantial monies to educational, environmental, and law enforcement causes, among others.

11 10. Cross-defendant Amber Laurel Baptiste is an individual and, on information and
12 belief, a native and citizen of Canada. In 2002, on information and belief, Ms. Baptiste entered
13 into a sham marriage for the primary purpose of circumventing U.S. immigration laws and is now
14 a resident of Los Angeles, California.

15 11. The Cross-Defendants identified herein as ROES 1-10 are unknown to Cross-
16 Complainant but aided and/or abetted Ms. Baptiste in her scheme.

17 **JURISDICTION AND VENUE**

18 12. Jurisdiction is proper in the County of San Mateo and in this Court. Ms. Baptiste
19 filed the initial complaint with this Court, thus voluntarily consenting and submitting to this
20 Court’s venue on any counterclaims filed against her by Mr. Goguen.

21 13. Venue is proper in the County of San Mateo. Ms. Baptiste filed the initial
22 complaint with this Court and may not thereafter object to this County as an improper venue for
23 any compulsory counterclaim that Mr. Goguen must assert against her.

24 **STATEMENT OF FACTS**

25 14. Ms. Baptiste and Mr. Goguen met in or around 2002. Mr. Goguen was at the time,
26 and still is, one of Silicon Valley’s most prominent venture capitalists and philanthropists.
27 Ms. Baptiste was an exotic dancer. She was twenty-two years old, and had recently moved to the
28 United States from Canada.

1 15. Ms. Baptiste and Mr. Goguen thereafter commenced a friendship, and later intimate
2 relationship, that spanned over a decade. They saw one another occasionally, typically no more
3 than a few times a year, largely at Ms. Baptiste’s request. At all times, the relationship was
4 entirely consensual. Ms. Baptiste not only welcomed, but encouraged and pursued, the intimate
5 relationship they formed. Time and again she propositioned Mr. Goguen, offering to travel to
6 meet him and asking that they see each other more frequently.

7 16. Repeatedly throughout their relationship, Ms. Baptiste expressed to Mr. Goguen
8 how kind and generous he was with her and how much she loved every sexual encounter. As just
9 a few of the many examples, Ms. Baptiste wrote to Mr. Goguen over the years:

- 10 • “You are like a shining star. When I am with you I get to forget everything else
11 in my world and just enjoy the sheer ecstasy that my body experiences with your
12 every touch;”
- 13 • “Just talking and listening and sharing with you stimulates everyone [sic] of my
14 senses. Then there is all the sexy stuff that completely sent me over the edge;”
- 15 • “I always want everything to be comfortable and sexy and erotic between us;”
- 16 • “You gained my full trust because when ever I came to see you you always
17 respected my decisions with that [sic] I was comfortable sexually and never
18 pushed me to do more than I wanted to and now I am ready to do more and I
19 hope you are there for that as well;”
- 20 • “Something really does happen inside of me when I see you and even more so
21 when you are inside of me. A really heavenly feeling, it stays with me for days
22 afterward;” and
- 23 • “I miss you dearly. I miss your touch on my body. When you make love to me
24 I am portaled away to some far off place of delight.”

25 17. In addition to her written seductions, Ms. Baptiste repeatedly sent Mr. Goguen
26 sexually provocative and pornographic photographs of herself, unclothed or scantily clothed, in
27 furtherance of her efforts to convince him to see her more often. A few of the milder
28 photographs—sent in 2013, after she claims to have been raped, abandoned hemorrhaging in a

1 foreign country following hours of forced sodomy, and intentionally infected with a STD—
2 include the following:



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1 It defies logic and common sense that an alleged victim of “rape,” “abuse,” and “sexual slavery,”
2 would send such provocative photos to the alleged perpetrator.

3 18. The reality is that Ms. Baptiste was an exotic dancer, first looking for a payday, and
4 later revenge. From the early stages of their relationship, Ms. Baptiste propositioned Mr. Goguen
5 for money. Among other things, she told him “[y]ou also hold the keys to my freedom from
6 stripping,” and proposed that “[y]ou provide me freedom from stripping which equals bliss for me.
7 And I become your mistress and you my secret intimate partner. I can come see you on your trips
8 and make you the happiest man alive.” Mr. Goguen was generous with Ms. Baptiste and wanted
9 to help her to have a better life. Over the years, he provided her with hundreds of thousands of
10 dollars. This enabled her to quit her job as a “dancer” and pursue her interests without needing to
11 worry about finances, or even having to work.

12 19. Mr. Goguen was upfront with Ms. Baptiste that they were not in a monogamous
13 relationship including that, at various times throughout their relationship, he was married.
14 Ms. Baptiste willingly continued with and pursued the intimate relationship with Mr. Goguen,
15 despite knowing that she was not Mr. Goguen’s only sexual partner. At one point when
16 Mr. Goguen informed Ms. Baptiste that he had re-married, Ms. Baptiste submitted an unsolicited
17 “application to be your forever dream girl[;] Your muse and mistress. It is a giant turn on to me
18 to have a secret rendezvouses [sic] with you.” She explained to Mr. Goguen that she accepted the
19 fact that they were not monogamous because, as she told him, “I think that I adore you so much
20 and you are so sweet with me that it over rides [sic] the other women part in my mind. . . . I
21 never thought ok one day we would be together because that is not how it works. If you started as
22 the other woman then you will always be the other women [sic].” On information and belief,
23 Ms. Baptiste also continued throughout this time to have intimate relations with men other than
24 Mr. Goguen, and wrote to Mr. Goguen about her long-term boyfriend, as well as her adventures
25 dating other men.

26 20. Ms. Baptiste now claims to have been infected by Mr. Goguen with several “high-
27 risk strains” of the human papilloma virus (“HPV”). HPV is the most common sexually
28 transmitted infection. HPV is so common that nearly all sexually active men and women get it at

1 some point in their lives. It can be transmitted via sexual intercourse, and also by other
2 contact. In the vast majority of cases, the body clears the HPV without any treatment; it goes
3 away on its own and does not cause any health problems. In fact, importantly, Ms. Baptiste
4 admitted in writing in June 2013 that she “no longer has the virus,” if she ever really had it at all:

5 6/25/13	It is out of my body now. Thank heaven for that. I had the biopsy on my cervix and everything is clear now. 100 percent gone.
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7 21. Even if one contracts HPV, it is virtually impossible to determine the source of the
8 virus for a number of reasons: it is so widespread among the sexually active adult population, a
9 person can develop symptoms long after being exposed, it can be transmitted through intercourse
10 and other forms of contact, people may contract and clear the virus multiple times throughout their
11 lifetimes, and many if not most of those infected are unaware that they have or had the virus. Mr.
12 Goguen has never been diagnosed with HPV that he is alleged to have communicated. Nor does
13 Mr. Goguen believe that he has or ever had any “high-risk strains” of HPV, as Ms. Baptiste claims
14 to have had. In fact, there is no FDA recognized test for detection of HPV in men, therefore the
15 concept of knowingly transmitting the virus from a man is non-sensical. Mr. Goguen did not, nor
16 would he ever, intentionally infect Ms. Baptiste with HPV, or suggest that she intentionally
17 communicate the disease to her other sexual partners.

18 22. Ms. Baptiste was at all times a willing and enthusiastic sexual partner. In addition
19 to applying to be Mr. Goguen’s forever “mistress,” she repeatedly complimented him on his
20 lovemaking, as well as his kind and generous nature. She consistently described their intimate
21 relations as entirely welcome and pleasurable. Indeed, her most heinous allegation of forcible
22 sodomy leaving her hemorrhaging to death in June 2012 in London was an entirely consensual
23 sexual encounter that she characterized in emails as a highly pleasurable night that she wished to
24 repeat. Ms. Baptiste’s own words in an email to Mr. Goguen confirm this fact:

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1 7/30/12 I would never erase that night for anything. It was beautiful each and every
 2 moment.
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 4 At this time in my life I am becoming extremely sexual inside. Much more erotic
 5 in my mind than I used to be. Although what most people do not understand about
 6 me is I am a very orgasmic being all on my own. I can become very aroused by the
 7 simplest things like tastes and water on my body. Perhaps it is the reason I do not
 8 need to experience many lovers. I love you so I do not want to try. I want to feel
 9 everything with you. So when you have time you must come to me.

I want to show you so many delights. It seems to me my senses are heighten to
 you. I can feel you far away. The last night together was really incredible for me. I
 could feel so many things moving between us that I have not felt before. Hopefully
 I will feel you again soon.

10 23. Far from leaving her bleeding and alone, the supposed “tear” was minor enough
 11 that Mr. Goguen did not know about it until a month later when Ms. Baptiste informed him in the
 12 same July 30, 2012 email:

13 7/30/12 Beautiful love
 14 I miss you very much... I hope you are well. I have been hoping to see email from
 15 you with good news. That all matters are well.
 16 As for myself I am great really great. I feel well. I am enjoying the summer. I have
 17 a little bit of bad news to tell you.... Well it is not so bad. everything will be much
 18 better next week.
 19 I am not crying I am not stressed at all. Just a little uncomfortable. I am still in
 20 Europe. I must remain here. I can continue to travel after a swift recovery. I must
 21 have a small surgery on friday. I had not told you because I absolutly do not feel it
 22 is your problem it is my body so it is my concern. I thought the problem would fix
 23 its self. When we were together last time I tore the tissue and ruptured a vein on
 24 the inside. I continued bleeding so I went to the doctor. I was not sure what had
 25 happened. It had never happened before. I did not know the first doctor and did not
 26 feel comfortable with him examining me. I waited a couple of more days. I went to
 27 the a medical center. I asked to see a doctor.
 28 . . .
 The doctor who will do the operation is a very good doctor and a nice person. He
 is not concerned as to why or how this occurred. He says I am very small inside. I
 can not do such a thing I told him that we had done it more than 20 times and less
 than 30 over the course of 10 years. He says I am lucky this did not happen earlier.
 And I am lucky the damage is not much worse. I am sure that if this would have
 happened 10 years ago I would have been distraught. Also because it is you and I
 there is nothing upsetting to me about it. If it had been a stranger I may have had a
 meltdown. This is why I do not make out with strangers. We inserted something in
 a place it was not meant not go and The tissue tore. It is not a big deal. It is part of
 life.

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Darling I promise you I am not upset at all. I simply want him to fix it. I had not
thought something like this could happen. I would never erase that night for
anything. It was beautiful each and every moment.
...
I suppose that is all for now. I love you....Love you...Love you Forever Amber

24. Upon learning that Ms. Baptiste was hurt and scheduled to have what she characterized as a “small surgery,” Mr. Goguen immediately expressed his remorse that she was injured and provided her with enough money so that she would have the best medical care possible. Ms. Baptiste assured him that “You do not have to feel bad at all. . . . I promise promise it is not your fault I was a willing participant to this accident.”

25. As time went on, Ms. Baptiste became increasingly resentful and bitter. She wanted Mr. Goguen to spend more time with her, to make love to her more often, and to generally make a greater commitment to her. She protested their lack of contact, writing often that she missed him terribly and lamenting that they only saw each other infrequently. She also began to resent Mr. Goguen’s wife and became increasingly jealous. Ms. Baptiste spewed venomous attacks against Mr. Goguen’s wife and sought to convince Mr. Goguen that he should be with her instead.

26. As Ms. Baptiste got deeper into her fits of jealousy, she became increasingly delusional. She frequently referred to her supposed “psychic” abilities and seeing things on a “screen” in her head. She remarked to Mr. Goguen, for example, that “I see plenty of other things in the screen in my mind,” and “[t]his sort of psychic downloading has happened so many times in my life I must now accept that my brain has the ability to feel sense hear and pick up on some different frequencies when it comes to some people and some things.” She tried to defend her sanity claiming “I think I am completely sane. . . . When these occurrences take place it seems as if it is coming in on another channel. Like on a television.”

27. As time passed, Ms. Baptiste became increasingly frustrated that Mr. Goguen spent so little time with her and remained married to a woman she reviled. As she entered her thirties, she communicated her desire to have children and told Mr. Goguen she wanted him to be their

1 father. But Mr. Goguen did not leave his wife then and, as Ms. Baptiste learned, he and his wife
 2 had more children.

3 28. Eventually, Ms. Baptiste concluded that if she could not have Mr. Goguen’s heart,
 4 at least she could have his money. By January 2014, Ms. Baptiste threatened to publicly accuse
 5 Mr. Goguen of violent rape and intentionally spreading a sexually transmitted disease, among
 6 other horrible conduct unless Mr. Goguen acquiesced to her exorbitant demand for a \$40 million
 7 payment. She knew these allegations were false. Among other things, during their relationship,
 8 Ms. Baptiste never accused Mr. Goguen of any misconduct. Far from calling him sexually,
 9 physically and emotionally abusive, she called him loving, kind, and generous.

10 29. The following chart highlights just a few examples of how Ms. Baptiste’s story
 11 changed over time:

	Before Rejection	After Rejection
About Mr. Goguen	<p data-bbox="483 936 989 978">Kind, sweet, delicate</p> <p data-bbox="483 1010 989 1157">“I wanted to say thank you for always being so sweet and kind to me. I adore you so much and find you so fascinating.”</p> <p data-bbox="483 1188 989 1304">“[T]hank you for always listening to me. You are really a great friend and encouragement for me.”</p> <p data-bbox="483 1335 989 1556">“You are absolutely the most amazing man I have ever met. Even when I feel really bad in my heart in the most kind and innocent way you make me feel a million times better. Your manner is so sweet and delicate.”</p>	<p data-bbox="1021 936 1526 978">Rapist, murder, and pedophile</p> <p data-bbox="1021 1010 1526 1157">“What you have done is totally completely illegal. . . . You can not rape me again. You can not stalk me, you can not murder me.”</p> <p data-bbox="1021 1188 1526 1703">“Murdering a human being by intentionally transmitting a fatal virus to their body is a crime[;] Rape and molestation are crimes[;] Buying prostituted sex is a crime[;] Hiring sex from a minor is a crime[;] Sleeping with multiple women when you know you are infected with a disease is a crime[;] Destroying someones [sic] body through anal sex should be a crime[;] Mentally sexually emotionally and physically abusing a person is a crime[;] The sale and purchase of another human being is a crime[.]”</p>

	Before Rejection	After Rejection
<p>1</p> <p>2 About their sexual relationship</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p>	<p>Heavenly and Comfortable</p> <p>“Something really does happen inside of me when I see you and even more so when you are inside of me. A really heavenly feeling, it stays with me for days afterward.”</p> <p>“You gained my full trust because when ever I came to see you you always respected my decisions with that [sic] I was comfortable sexually and never pushed me to do more than I wanted to and now I am ready to do more and I hope you are there for that as well.”</p>	<p>Abusive and Violent</p> <p>“Every time that you had sex with me and [sic] I would start vomiting because I could not process the pain.”</p> <p>“You sexually abused me for years.”</p> <p>“Every time you had sex with me it was painful. It was humiliating it was emotionally painful I suffered every time. I would just cry and cry and cry.”</p>
<p>12 About the London Incident</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p>Beautiful and Incredible; I was a willing participant</p> <p>“Darling I promise you I am not upset at all. I simply want him to fix it. I had not thought something like this could happen. I would never erase that night for anything. It was beautiful each and every moment.”</p> <p>“The last night together was really incredible for me. I could feel so many things moving between us that I have not felt before. Hopefully I will feel you again soon.”</p> <p>“You do not have to feel bad at all. . . . I promise promise it is not your fault. . . . I was a willing participant to this accident.”</p>	<p>Forcible sodomy that almost caused me to bleed to death</p> <p>“[He] forcibly sodomized [me] for hours, eventually ripping through [my] anal canal and causing a 7-inch tear. He left [me] bleeding and alone on the floor of a hotel room and left the country. [I] was left to seek emergency medical aid alone in a foreign country, nearly hemorrhaging to death.”</p>

24

25 30. Yet despite the falsity of Ms. Baptiste’s revisionist history, Mr. Goguen was

26 understandably sensitive to public disclosure of false and incendiary claims that could devastate

27 his family, including his teenage daughters and his wife who was pregnant when Ms. Baptiste’s

28 extortion began—as well as damage Mr. Goguen’s own professional and personal reputation.

1 31. Ms. Baptiste initially communicated her extortionate threats through a lawyer, who
2 demanded that Mr. Goguen quietly pay forty million of dollars in exchange for a promise that Ms.
3 Baptiste not make false and inflammatory allegations of rape and sexual assault against
4 Mr. Goguen. Once it became clear that her extortionate demands against Mr. Goguen were
5 working, however, and that Mr. Goguen was willing to pay money in response to the threats,
6 Ms. Baptiste fired her lawyer. As she told Mr. Goguen, her lawyer was working on contingency,
7 and she did not want to share a percentage of any money she was able to extract from Mr. Goguen
8 with her lawyer. She wanted to keep it all to herself.

9 32. At the same time she was extorting tens of millions from Mr. Goguen and firing her
10 lawyer to keep all of the money herself, Ms. Baptiste was also divorcing her self-described “sham
11 husband” of more than a decade. On November 22, 2002, Ms. Baptiste married a man named
12 Jerico Andrew Gilbreath in Texas for the purpose of immigration fraud. As she admitted multiple
13 times in various emails she paid her “sham husband” money for his service, and then never saw
14 him again. She timed her divorce in early 2014 along with the execution of the Extorted
15 Agreement to ensure that she also did not need to share any of the extorted money with him.

16 33. Under fear of Ms. Baptiste’s threats to publicly ruin him, Mr. Goguen initially tried
17 to reason and negotiate with her. Ms. Baptiste at first agreed to a payment of \$10 million, but
18 then backtracked. Ms. Baptiste continued to raise the ante, repeatedly threatening public
19 disclosure of incendiary (but untrue) acts. Mr. Goguen’s wife had recently given birth to their
20 youngest child, and he has other children who would read about the horrific things being said
21 about their father. He implored Ms. Baptiste not to destroy his children. But she persisted. To
22 protect his family’s privacy and reputation, and to buy peace from Ms. Baptiste’s inflammatory
23 accusations, Mr. Goguen ultimately acceded in direct negotiations with her to satisfy her \$40
24 million demand to keep Ms. Baptiste’s ruinous lies from being publicly exposed.

25 34. On or about May 23, 2014, Mr. Goguen executed a purported Release and Personal
26 Injury Settlement Agreement (the “Extorted Agreement”). This document provided that
27 Mr. Goguen would pay Ms. Baptiste the full \$40 million that she demanded to avoid publication
28 of her false and inflammatory allegations. Pursuant to the Extorted Agreement, the payments

1 were to be made through four installments of \$10 million every six months starting on June 1,
2 2014. Within a week of signing the agreement, Mr. Goguen made the first payment of \$10
3 million called for under the Extorted Agreement.

4 35. Mr. Goguen expected that his complete satisfaction of Ms. Baptiste's extortionate
5 demands would free him from her demands and threats. Among other key provisions, the
6 Extorted Agreement included a no-contact clause that required Ms. Baptiste to refrain from all
7 communications with Mr. Goguen "with the exception of communications pertaining directly to
8 the implementation" of the Agreement.

9 36. Far from buying Mr. Goguen the peace that he expected, Ms. Baptiste's
10 harassments and threats only increased. Since signing the Extorted Agreement, Ms. Baptiste has
11 bombarded Mr. Goguen with over two thousand text messages that became increasingly vitriolic.
12 Ms. Baptiste escalated her attacks on Mr. Goguen's wife, again spewing racist rants against her.

13 37. In an effort to extort more out of Mr. Goguen, Ms. Baptiste invoked Mr. Goguen's
14 children and what they would think upon hearing of their father's "sexual delinquency."
15 Ms. Baptiste also renewed her accusations that Mr. Goguen was a rapist, a murderer, and a
16 pedophile, and repeatedly threatened to send Mr. Goguen to prison unless he acceded to her new
17 demands. For example, she claimed that she would put him in prison where "somebody will fuck
18 you in the ass do [sic] hard they tear through you [sic] flesh and leaving bleeding [sic] in the
19 emotional cage of [y]our prison cell" where "[s]omeone with [sic] then knowingly transmit a life
20 altering fatal disease to your body. Most likely HIV and have zero regard for your health or well
21 being."

22 38. Among her new demands was that Mr. Goguen accelerate the payment schedule to
23 pay her another \$30 million by the end of the year (in addition to the \$10 million he had already
24 given her). She continued to hound Mr. Goguen despite his explaining that he would not
25 accelerate the payment schedule beyond what was laid out in the Extorted Agreement.

26 39. Fed up with Ms. Baptiste's continual abuse, on or about August 25, 2014,
27 Mr. Goguen politely reminded Ms. Baptiste that she promised no further communication or
28 harassment. She did not relent. As she continued her increasingly vitriolic rants, he reminded

1 her of her promise of no contact and asked her to cease communicating with him. She refused.
2 She continued to barrage Mr. Goguen with hundreds of false and inflammatory text messages.
3 He politely reminded her several more times to stop the harassing texts. Again, she refused.

4 40. On or about October 24, 2014, Mr. Goguen again reminded Ms. Baptiste of her
5 commitment to leave him alone: “Amber, as clearly stated in our Release and Personal Injury
6 Settlement Agreement dated 5/23/14, section 9, you agreed to cease all communications with me,
7 other than communication pertaining directly to the implementation of the Agreement. This text
8 is to put you on notice that your incessant, demanding, threatening, harassing, and wildly
9 slanderous texts to me are expressly prohibited by section 9, and therefore constitute a material
10 breach of the Agreement. Please stop immediately.” She did not.

11 41. With the frequency and abusive tenor of Ms. Baptiste’s messages only escalating,
12 on December 19, 2014, Mr. Goguen’s attorney informed Ms. Baptiste that Mr. Goguen would not
13 be making further payments pursuant to the Extorted Agreement because it, having been procured
14 through extortion, was null and void and, in addition, Ms. Baptiste materially breached the
15 agreement, excusing Mr. Goguen’s performance and entitling him to rescission.

16 42. With Ms. Baptiste continuing to harangue Mr. Goguen, on or about December 30,
17 2014, he again asked her to stop contacting him and instead direct all communications to his
18 attorney. Ms. Baptiste again refused, continuing her attacks on Mr. Goguen despite several
19 further admonitions from Mr. Goguen’s attorney to stop. Unrelenting, Ms. Baptiste retorted that
20 “[h]e can expect to receive thousands of text message from me until this is resolved” and
21 continued to harass Mr. Goguen.

22 43. During this time, Ms. Baptiste’s grasp on reality further loosened. In addition to
23 having made up claims wholesale—that Mr. Goguen abused her physically and sexually—and
24 continuing to reference the “screens” in her head, Ms. Baptiste also became increasingly paranoid.
25 Despite no truth to the allegations whatsoever, she began making spurious allegations that
26 Mr. Goguen was having her followed, stalked, and monitored. Nothing of the sort was
27 happening. She repeatedly threatened to go to the police to report the stalking but, upon
28 information and belief, never did.

1 to the extent it is enforceable, and return of the \$10 million payment Ms. Baptiste received
2 pursuant to the Extorted Agreement. As a proximate result of Ms. Baptiste's breaches of
3 contract, Mr. Goguen has suffered, and will continue to suffer, damages in an amount to be proven
4 at trial. Mr. Goguen seeks compensation for all damages and losses proximately caused by
5 Ms. Baptiste's breaches.

6 **FIFTH CAUSE OF ACTION**

7 **(Restraining Order Pursuant to C.C.P. § 527.6)**

8 66. Mr. Goguen repeats and re-alleges, as if fully set forth herein, the allegations of all
9 the preceding paragraphs.

10 67. Ms. Baptiste has engaged in a knowing and willful course of conduct directed at
11 Mr. Goguen that seriously alarms, annoys, or harasses him, and that serves no legitimate purpose.

12 68. Ms. Baptiste's course of conduct is such that would cause a reasonable person to
13 suffer substantial emotional distress.

14 69. Ms. Baptiste's course of conduct did and does actually cause Mr. Goguen
15 substantial emotional distress.

16 70. Under Code of Civil Procedure § 527.6, Mr. Goguen is entitled to a restraining
17 order enjoining Ms. Baptiste from harassing, intimidating, stalking, threatening, or otherwise
18 contacting him.

19 **SIXTH CAUSE OF ACTION**

20 **(Violation of the California Invasion of Privacy Act)**

21 71. Mr. Goguen repeats and re-alleges, as if fully set forth herein, the allegations of all
22 the preceding paragraphs.

23 72. Ms. Baptiste and Mr. Goguen's telephone conversations were confidential
24 communications carried on in circumstances as may reasonably indicate that Mr. Goguen desired
25 the communication to be confined to him and Ms. Baptiste. Mr. Goguen spoke to Ms. Baptiste
26 from California, where he is a resident.

27 73. Ms. Baptiste admitted that she intentionally and, without the consent of
28 Mr. Goguen, recorded confidential telephonic communications between her and Mr. Goguen.

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REQUEST FOR JURY TRIAL

Mr. Goguen hereby requests a jury trial on all issues triable thereby.

DATED: March 14, 2016

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By:



Diane M. Doolittle
Attorneys for Michael Goguen

EXHIBIT A

DATE	EMAIL
3/25/02	Hi Mike You are so sweet. I bet that you thought I had forgotten about you. I dropped my computer and it is not working. I finally got to the internet cafe today. I can't wait to see you again but it will most likely not be in April. I have a wedding and a family reunion to attend. I will be leaving Dallas this friday to go home. I Have an offer to go to New york at the end of April but I am still waiting for details. Otherwise I will be returning to Dallas. So I am hoping to meet up with you sometime in May.I hope all is well with you. Take care. Write soon or feel free to call anytime. (403) 617-3130. xoxo Amber
5/03/02	Hi Michael, Where in the world are you today? ... What day are you coming to Dallas? How long are you staying? I can't wait to see you
5/23/02	Good morning Michael Hope you are having a wonderful day.....If you get a chance call me this afternoon. I love hearing your voice it seems to create so sort of a euphoria for me. You are such a sweet man. I wish you were here with me right now. Miss you lots. Talk to you soon. Forever Amber
6/14/02	All I know is that I went to work at baby dolls one night and stumbled across the path of this amazing man. ... I know that you probably feel ripped off that you spent all of this time trying too get me to give in to all of these wonderful emotions that I was feeling that I had never felt before. But I am so proud of myself for resisting the biggest temptation ever. I can picture in my mind the kind of lovers the we would be. {the sheet siring sex for days on end barely come up for air kind} Which would fulfill all of my desires for those few days but afterward I would have felt like I failed. So I believe that you were the angel that was sent to show me not to give up that I will find the perfect lover one day. I want you to fully understand the significance of what you brought to my life ... Michael I can only hope that you can grasp my realm of thinking and see how you helped me. I also hope that I might have brought something to you that will also help you achieve your ultimate happiness. Michael if I were to never see your beautiful smiling face again know that you gave me something so special in a time that I really needed it. No matter where I go or where my path in life takes me a piece of you will go with me. Love Forever Amber

DATE	EMAIL
6/12/03	I really enjoyed our night....Thank you for being such an amazing friend to me in every way. You have this incredible ability to bring the super happy feeling to all of my senses. Just the few hours that we spend gives me the greatest sensation.
8/19/03	It was just a really exhausting night. Never the less I had a wonderful time. I had a card to give you. But I forgot. Basically thank you for always being so sweet. Write soon.
4/6/04	Dearest Michael, Could you be any sweeter. I always thought I was the luckiest girl in the world to have some one like you in my life. ... Love Forever Amber
4/30/04	How is my favorite Prince doing. I am missing you like crazy. 10 million kisses form me to you But spread them out to all the special places.
5/3/04	Anyways Michael I just want you to know what a special place you hold in my heart. You never cease to amaze me with your personality your kindness you gentle touch. With all the life changes I have been going through since my accident I have been getting rid of the old and in with the new. But you are forever. I hope we never ever lose touch. Our friendship has been one of a kind since the first day when you guessed my name. There is something interesting every time we get together. Whether your having a nap on my blow up bed or I am lost in a tyrannical down pour trying to find your hotel. The landing gear won't come down on your plane. The lights are out in Toronto. I am getting sick on two glasses of wine. But it always ends up being a great time from the moment your brown eyes meet mine when you open the door. I thank you for so many great times. You always make me feel super sexy. It is so hard to hold back sometimes. It is very important to me that you know how special you are to me and that I would never do anything to upset you or the equilibrium in your life. I know sometimes you are scared I might drop your name or show a picture. But never in a million years would I do anything to jeopardize our friendship. I trust you with my life which I honestly can count on one hand how many others I trust like that. You can trust me the same. I would do anything for you. I think it is so neat that we have become so close but yet really know so little. I am the girl who shows up with the little over night bag and you the guy who kisses me goodbye in the morning. I always leave on cloud 9.
7/18/04	If I end up living here you will have to make sure you make some new business ventures over here so we won't miss any meetings. Every time I see you I look more forward to seeing you again. You are such a breath of fresh air. I don't think you even realize. Last time was by far my favorite to date. Just talking and and listening and sharing with you stimulates everyone of my senses. Then there is all the sexy stuff that completely sent me over the edge. I love that we have grown to care for and trust one another to share each other so completely. I can't wait till I am twenty five. Just 455 days away. I feel I can share all the sexy stuff in the world with you. I am not shy with you in the least. I only hope you enjoy our time together as much as I do.

DATE	EMAIL
7/17/05	<p>Prince charming. I can't wait to see you. Just a few more days. I arrive on Wednesday at 2:30 and leave Friday morning. I hope you had a wonderful weekend. I travelled to white plains today to visit the Buddhist Temple. I love it up there it is very beautiful and serene. I am counting the minuets until we meet.</p> <p>10 kisses from me to you Love Forever Amber</p>
7/23/05	<p>Prince Charming I had such a nice time with you. Thank you for coming back to see me before you left.</p> <p>... I am sorry you can't make it to see me next week. But hopefully we will meet again soon. But I will meet you in my dreams. Sometimes I have sexy dreams of us together.</p> <p>I am almost 25. I am almost ready. There is a passion and eroticism inside of me that is ready to be opened up. And I would be honored to share it with you. Since we have taken all of these baby steps together. I could not share my body with someone who adored me less. I think it will be phenomenal for both you and I. So this is what I think should happen. I want to remain in Canada and do all my humanitarian work with kids and animals among other things. I want to take language courses cooking classes learn a martial art attend yoga class paint horse back ride among many other things. I want a life of peace and balance. I know if given the chance I will do great things. I have so many goals and dreams that I want to see through. You don't have time to do volunteer work so you can do it through me.</p> <p>So you my dear hold the keys to our sexual connection which I believe once opened up and done right will be amazing for both of us. I want to be open with no holds to experience something maybe neither one of us has felt before. You also hold the keys to my freedom from stripping. As long as I am doing that job I will be resilient about sex. For some reason I seem to connect it all and it causes me to close up sexually. So I propose this You provide me freedom from stripping which equals bliss for me. And I become your mistress and you my secret intimate partner. I can come see you on your trips and make you the happiest man alive. Then I can spend my time creating great things for myself and for humanity. I think its perfect so clearly it must be.</p> <p>Write soon I miss your kisses already forever Amber</p>
3/27/06	<p>You know Michael I really do miss seeing you and talking with you. It has almost been 6 full months since I last seen you. I hope you are well. And I would love to know more on what is happening in you world. I miss you and want to see you soon. Any place that you might be traveling to in the U.S is no more than a 5 hour flight for me. So see what your schedule is and see if we can't somehow get together. I miss you and hope to see you soon.</p> <p>Forever Amber</p>

DATE	EMAIL
2/11/07	<p>Dear Michael</p> <p>How are you? Where are you? I will be traveling to Dallas again soon. I have to return to immigration. I was Hoping to arrive when you will be there. Is this possible? I would really love to see you. I am missing our friendship very much. Hope fully we will meet again soon.</p> <p>XOXO</p> <p>Forever Amber</p>
6/18/08	<p>I must write you this letter to tell you exactly how special you are to my life. Your friendship means the world to me. I have traveled a lot and met a lot of people. I only enjoy who I enjoy and I enjoy them for different reasons. You became very special to my heart and guided me even if you did not realize you were doing so. I only keep a handful of very special people in my life.</p>
4/10/09	<p>I would very much like to see you again. It has been far too long. It is so true absence makes the heart grow fonder. I adore you so very much. And enjoyed our times together immensely. I understand why you have stayed away. But I want you to know that the things between us will always stay only between us.</p> <p>You have married and I understand if you think that it is best we no longer see one another, But I would like if we were to be the passion of each others lives. I will never tell anyone. Even if we were to run into one another I would not say anything.</p> <p>I want to put in the application to be your forever dream girl Your muse and mistress, It is a giant turn on to me to have a secret rendezvouses with you. For some reason you are connected to my heart on so many levels. So if you are still sexy sweet and clean. I would like to continue where we left off.</p>
5/9/09	<p>I want to reiterate to you that no matter what past present and future you can trust me. I feel your hesitation when I see you. And I fully understand that in this day and age its hard to trust anybody. There are so many things that factor into the decisions that we make in life. I don't know what I can say or do to cultivate your full trust in me that I would never do any thing tho harm you or invade your privacy. I feel that I can trust you know matter what and I want you to feel the same.</p> <p>I believe that you can never ask anything of more of someone than they are willing to give emotionally mentally or physically.</p> <p>You gained my trust by just being you and I feel as if I can tell you everything and be myself with you.</p> <p>You gained my full trust because when ever I came to see you you always respected my decisions with that I was comfortable sexually and never pushed me to do more than I wanted to and now I am ready to do more and I hope you are there for that as well.</p> <p>...</p> <p>I have no explanation for my adoration of you and the appreciation of the time we spend together other than that it is something that we both want, need and enjoy.</p> <p>...</p> <p>We talk and make love and it is fabulous. I am very happy that I feel so comfortable with you to talk about my life and my adventures and have never felt that you are</p>

DATE	EMAIL
	judging.
7/31/09	<p>Prince Charming</p> <p>Thank you for the wonderful night I think I am still dizzy. There is something very special about you. I can't quite put my finger on it but it affects my brain chemicals. Just know that no matter what for this whole life time and probably the next 7 lifetimes you are loved and adored so very much.</p> <p>Until next time Kisses and smiles from me to you</p>
9/14/09	<p>And next time you see me please remind me to start to show you how It feels to move energy Thru the body so that we can start to do some tantra. I have only every done white tantric which is not sexual but almost feels very orgasmic to me. So red tantra should be amazing. It seems though when I see you I get very dizzy so I forgot last time. And please find out the exact time of day that you were born and I can work on your chart. I will need The Month Day Year time of day and the city and if it was a really small town the closest major city so I can see it on the grid.</p> <p>1 million kisses from me to you. Love forever Amber</p>
10/14/09	<p>You know my brain operates much better when I see you once every month. I know you have all the these other things going on but You know your wives and girlfriends and and little girls, I am sure I adore you as much as they do I just don't requiring seeing you as often as they do. But I still like to see you. but sometimes you forget and then don't see me for one whole year. Ok one thousand kisses from me to you. XOXO</p>
1/8/10	<p>So this brings me to Dallas. It was actually an accident how I ended up there. I had met a girl who had been working in Houston. She told me it was good that the clubs were nice ect ect. So I thought that I could go there. Somehow when I flew to St Croix I flew thru Houston so I expected the same on the return. But I was routed through Dallas. I arrived Dallas with the plan that I would go to Houston the next day. I went to a hotel and I asked the taxi driver to take me to a strip club. So he took me to the men's club. I spoke with the manager and he said he would like to hire me but I needed a USA visa. He suggested that I go to baby dolls. So I did. I started working there. A few weeks later was when I met you. I remember it so very clearly I remember what you were drinking what you were wearing what I was wearing. I remember I went back to my hotel after work and I called you. And I think that the whole thing began because you called me when I was back in Canada before I decided to move to Dallas. And you were so sweet.</p> <p>...</p> <p>I guess because I enjoy our time together so much I would go anywhere to see you and I am happy to do anything for you. I don't think its ever been that easy because you are</p>

DATE	EMAIL
	<p>always involved with another girl so I am the other women or the other other women which I have never been. I think that I adore you so much and you are so sweet with me that it over rides the other women part in my mind. I guess sometimes I just don't like that I can't just call you up and talk to you whenever I want. And the one part that makes me happy is that even though you have been in these different relationships I get to see you over a period of time that now spans nearly a decade. I have never been upset with you and you have never yelled at me so I am happy with the situation. And I hope you are happy with it as well.</p> <p>...</p> <p>I don't really know what happened exactly but I thought about it from a moral standpoint and I don't think any body is getting hurt or ever has. I really adore you and care for you and love you. I guess differently than I would love my husband but I don't know because I have never had a husband. I guess there is no love gradient it just is what it is and I feel what I feel. And somehow my heart got connected to yours a long time ago.</p> <p>...</p> <p>I don't really know what happened exactly but I thought about it from a moral standpoint and I don't think any body is getting hurt or ever has. I really adore you and care for you and love you. I guess differently than I would love my husband but I don't know because I have never had a husband. I guess there is no love gradient it just is what it is and I feel what I feel. And somehow my heart got connected to yours a long time ago.</p>
3/26/10	<p>My Sweet Sweet Sunshine</p> <p>I had a dream about you last night. So yummy and delightful. Then I got up and played with my toys.</p> <p>So Tantric we are going to start trying it out as soon and you learn how to transfer energy. Supposedly sexual energy is the most powerful one. I understand how it works but I can only imagine what a red tantric experience would be like. Because I have never tried. From what I understand its different from regular sex. It is the sensation of two bodies becoming one. The orgasmic feeling is held for a long period of time. This is done thru breath and meditation and some different techniques. However you have to know the basics first. It will not happen in a day. But I am sure you will be glad you learned such a practice.</p>
4/21/10	<p>My Dearest Darling</p> <p>I miss you very much already and it has not been two moths yet since the last time I seen you.</p>

DATE	EMAIL
7/5/10	<p>My Dearest darling</p> <p>I hope you had a wonderful weekend and were able to relax a little. I miss you very much and I am very excited that I will be seeing you soon kissing you and touching you soon. Only a couple of more weeks.</p> <p>...</p> <p>I am as always busy with my yoga and all my projects. I am wondering if you are hoping that I become an entrepreneur in the next while? If that is the case I had better start on some project full-time. I don't ever want you to be disappointed in me. I really can't wait to see you again. So please let me know exactly which dates are good for you and where I will be coming to see you and I will make the arrangements.</p> <p>Love Forever Amber 1 million kisses from me to you</p>
8/13/10	<p>My Dearest Darling</p> <p>Let me start with saying I want you to know always and forever that I truly love you mind body and soul from the bottom of my heart. I think of you often and I do know when you think of me. It is the most pleasant sensation that washes over me. I can be in the middle of doing anything and it feels as if you just kissed my face.</p>
9/17/10	<p>My Dearest Darling</p> <p>I miss you so very much. I am counting the days until we meet again. I am in NYC now. I will remain here until the 29th with my girlfriends. It is a delightful time of the year in the city. I plan to travel by train next week after the conference to Boston.</p> <p>I looked at the calendar Thursday the 7th of October may not be the best day. I plan to make love to you all night. There will be no game of checkers:) I should expect to start my period on the 6th of October. If at all possible could I come to see you on the Monday of the same week. If that does not work please let me know which day will.</p>
9/30/10	<p>I will make the arrangements and see you next week. I can't wait to kiss you ... and feel your breath on my body.</p> <p>Love Forever Amber</p>
10/16/10	<p>I want you to be very very happy in your life. I do not ever want you to experience and sort of stress or emotional discontent. I don't ever want you to feel like there is not enough love in the world for you. If you do, all you have to do is lay next to me and that idea will be put to death. There are exponentially boundless amounts of love flowing from my heart to yours.</p> <p>...</p> <p>I am here for you no matter whattoday tomorrow and forever. I want love and happiness and contentment all around you.</p> <p>...</p> <p>You are of course going to carry some of this mistrust with you if people are constantly</p>

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	<p>coming at you with every investment scheme which I am sure there have been a million. It can become difficult to see a persons true intentions. If the women in your life have not been completely supportive of you, you will have some left over hurt from that. I am beseechingly requesting you to just leave all of that to the side with me.</p> <p>...</p> <p>My Heart is very protective of you. Not in a jealous sort of way. However my heart would hurt very badly if somebody hurt you.</p> <p>...</p> <p>I enjoy you on so many levels.... You are imprinted in my heart and in my soul. You always will be.</p> <p>...</p> <p>Never ever let me be a moment of stress or discontentment to you. I only want you to feel delight with me. Know that no matter what I am always here for you. You can always count on me and I will never ever betray you.</p>
1/6/11	<p>Beautiful Michael</p> <p>You look more and more beautiful every time I look at you.</p> <p>I miss you very much my dearest Darling.</p> <p>I think about you often.</p> <p>I pray about your life and hope that everything works out perfectly.</p> <p>I pray that you are always protected and always content.</p> <p>I hope you know and understand that I love you very very much and always will. I feel very very happy when I see you and feel you and interact with you. So of course my heart wants it to grow and grow. And then you are gone.</p> <p>It used to be easier I would not miss you immediately. This last time was the worst. The second day after I seen you I was crying a bit in the morning and then a lot in the afternoon and in hysterics by the evening. This went on for three days. I hate crying.</p>
2/10/11	<p>The best part is that we did find each other no matter how brief our moments together were we found one another. What I feel for you is real and it is forever. Some people live there whole lives and never find someone they love that much.</p> <p>...</p> <p>I am all finished my studied mid April. I like California I am tied to nothing here so I could move to the countryside and have a goat, a duck, a swan and a horse. A quiet life is what I prefer. Next weekend is my annual tea party in Palm Springs. I told you about the lady she has been my friend since I was 4 years old. I am delighted at the idea of sitting down to talk to her. She must be nearly 80. She called last week to set the date. I had planned to go to San Francisco for the day on the mon the 14th for the women's symposium but I don't think I will go. We will see. I have school all weekend this weekend.</p>

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3/9/11	<p>You are so adorable. I always try to save your sweet voice mails. I play them when I miss you. I have not had any for a long time because you had never left one since I bought the new handset. Now I have the one you left today☺</p> <p>I melt to pieces when I hear your sweet voice. I hope to talk to you by phone soon.</p> <p>...</p> <p>You should never have a sad moment because as soon as you feel sad you can just get to the place in your heart where you know a girl in the world loves you with all of her heart.</p> <p>Forever Amber</p>
4/12/11	<p>I miss you so Much. My Body Misses you so Much. I love you so Much. Hope you are well. Write me or call me soon.</p> <p>Forever Amber</p>
4/21/11	<p>I can't go to see you and make love to you and have you just walk out of my life one more time. I never liked it. But it became increasingly harder. If we were to continue to see one another we are going to become closer and closer. Eventually my heart would break into a million pieces. At that point I would not be able to fix my heart. I would end up never ever speaking to another man again and would have no hope of ever falling in love.</p> <p>...</p> <p>This is probably why the universe gave me to you. I am here to help. Besides. It is a fair exchange. If you weren't helping me with my own life. I could have married a man I didn't love because I didn't have enough money for my life. I could be standing on a stage having coins thrown at me. I could have moved to a homeless shelter eventually. Any number of bad things could have happened. Because of you I have a safe happy life.</p> <p>...</p> <p>Love Forever Amber</p>

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<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p>	<p>5/13/11 I am so happy and peaceful when my daydreams take me away to being in your arms. Your kiss..... your breath.</p> <p>...</p> <p>My beautiful love you can always call me about any matter. You can always come to see me if you need beautiful energy around you or love around you. I will always be someplace in the world that you may find me. My love for you is forever. If you ever decided that your love for me is strong enough you can come to me and I will be by your side forever.</p> <p>...</p> <p>I love you so very much. No matter what I just want your life to be the happiest it can be. With your children, your relationships, your health and your career. You are absolutely the most amazing man I have ever met. Even when I feel really bad in my heart in the most kind and innocent way you make me feel a million times better. Your manner is so sweet and delicate.</p> <p>Sweet dreams to you my love.</p> <p>Forever Amber</p>
<p>12</p> <p>13</p> <p>14</p> <p>15</p>	<p>5/18/11 I miss you very much. But am so glad to hear you are doing well. There is no end to the amount of words that I could write to you..... the amount of kisses I could give you..... or the amount of love I have in my heart for you.</p> <p>Rest Well</p> <p>Love Forever Amber</p>
<p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p>	<p>7/25/11 Beautiful Love</p> <p>Here are some photos. I hope you found some of pictures of beautiful you to send me. (you are the most beautiful man in the world to me) I printed my favorite picture of you and keep it locked away with my notebooks. I look at it when I miss you and get very happy. You have a very angelic presence about you.</p> <p>I miss you</p> <p>Love Forever Amber</p>
<p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p>	<p>8/1/11 This affair has been going on for 9.5 years. I do not regret any of it. I enjoy every moment with you immensely.</p> <p>My issue is I barely have any moments with you.</p> <p>...</p> <p>I have a no win situation here. I love you. If I do not see you my heart misses you. If I do see you then I go home in a heap of my own emotions and miss you more. You do not have a no win situation. You have a wife that must be great otherwise you would not have married her. If you aren't happy with that you have me who loves you very much. I told you I would take care of you and help you with anything in your life.</p> <p>...</p> <p>I sometimes feel this overwhelming sense of peace when I know that you are thinking about me. Sometimes I have some strange sexual sensations. Sometimes I become</p>

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	<p>really agitated and sad I assume this is when you are sad. I am not positive that that is what is happening but I have no other premise upon which I can base the fact that I can be in the middle of say having lunch with a friend and suddenly I am washed over with this sensation out of nowhere.</p> <p>...</p> <p>What an honor it is to be your wife and lover and an even bigger honor to be the the mother of your children and experience the joy of raising them.</p> <p>...</p> <p>You not only owe it to your self and the kids for them to turn out exceedingly well but you owe it to me because in essence I get to spend my whole life on this planet with out the man I truly love with all of my heart. So if they did not turn out well I would be extra extra sad.</p>
9/5/11	<p>That which flows between you and I is really very interesting. Its mystical and magical and very intense. Long after you leave my physical line of sight I still see and feel you on a more subtle level.</p> <p>I believe there is an entire reservoir of love and sexuality between us that has yet to have been tapped into. I believe there is such thing as a soul that vibrates at the same frequency so such types of communication are possible. Finding that person and not sharing a life with them is a very difficult concept to grasp. What I believe and what reality is could be two very different things.</p> <p>...</p> <p>I appreciate the things you do to take care of me. It helps my life immensely I give my time to others which helps the world and that is good for me and for you and for others.</p>
10/3/11	<p>I hope that you can find a way to see me before my departure. I will be teaching at an event and then depart for Texas the night of the 14th.</p> <p>...</p> <p>I am happy that you are doing well other than your shoulder. I wish I was there to be your doctor. I hope to see a new picture of you soon.</p> <p>I love you so very much.</p> <p>Forever Amber</p>
10/28/11	<p>Beautiful Lover</p> <p>Thank you so much for the other night. You are as lovely as ever. Each and every moment we spend together is so special and perfectly stored away in my memory bank forever and ever. You taste so delicious and fit perfectly inside me like a puzzle. Every single touch imprints onto my memory. When I think about it I want you right here beside me. I wanted to make love to you one more time in the morning but you were up and gone so quickly we didn't have the chance.</p> <p>...</p> <p>I will miss you while I am on the other side of the world. However I am with you in your heart as I have always been as will always be. Even if we aren't near each other often you are one of my very best friends and my forever love. I could never forget one moment with you. I love you so much more than you realize. You can count on me for</p>

1 DATE	EMAIL
2	anything.
3 4 5 6 7 8 9 10	<p>10/28/11 Ok My love I will close for now. Seriously you are just so delightful and you are a really awesome human being. You have so much to do still in your life and many great accomplishments to achieve. You always make me laugh. Thank you for sharing the cutest story about your parents. The “eye witnesses”. So priceless. That is one of the things that I love about you. I mean you tell me these things with such a sweetness. You told me a story once of a coyote and a guy and the two of you alone in the woods. It was hysterical.</p> <p>...</p> <p>I love you so very much!!!!!! Thank you so much for being in my life!!!! Our interaction holds such a special place in my heart. So remember this. If you are sad I feel sad. So your job is to get everything in order and be filled with super happy feelings by the time I get back. I love you..... I love You.....I could never even make love to you enough times to show you how special you are to me.</p>
11 12 13 14	<p>5/3/12 I want to see you more than I want to do anything else in the world. However I will just fill my days with 100 other preoccupations. You will continue to fill the void with new companies new buildings new children and I will continue to discover the sights of the world to fill the void in my heart. As far as I am concerned 3742 days that we could have been happy together have already been squandered away. All I know is that I love you very much and always will.</p>
15 16 17 18 19 20 21 22 23 24	<p>7/9/12 I feel so very honored to share the experiences that we have shared. I hope that we have the chance to experience many things together this lifetime. I want you to experience to complete love of a woman.</p> <p>...</p> <p>There are so many things that I want to show you. I think your life will be completely different. You will see what I see. I am very sure that you are capable.</p> <p>...</p> <p>Secondly you must realize that I do not come to you for money. I come to you because I am wanting to have an experience with you. We have something that we are supposed to experience together. We have great work to do together this life. Every derivation of you and I is love every component of you and I is love. It is undeniable. We love one another. We do not even have to be near one another and the love travels.</p> <p>...</p> <p>I am not a difficult person. I can be stubborn. I feel that I always have good reason for my stubbornness. If I feel caged or I feel a situation is not right for me I will not budge an inch.</p>
25 26 27 28	<p>10/16/12 Baby I love you so much... I do not want you to feel sad ever. I really just wanted to love you and spend time with you. I never wanted either of us to feel bad even for one second. I never meant to imply that I was giving you an ultimatum. I said it is going to be impossible to maintain both of these situations forever. Some days I feel so sad because I never ever know when I am going to see you. I do not like you being so far away from me. I love every part of you and I only ever want to add happiness to your life. I never wanted to talk about any of these uncomfortable things. I can at times be</p>

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	quite unreasonable in thinking because I feel there is a better way of doing things the world should be doing it that way. I feel like we love each other so very much there is no sense in us being apart.
10/30/12	<p>I am quite interested in exploring my sexuality and I would like to discover all of this with you. If you are not available for this I understand. I know that I love you and that I feel really really good when I am with you. I feel all matters of erotica bursting inside of me. I want to absorb every bit of magic involved. I want to share everything that is inside of me with you. I believe that we have the maximum capacity to receive please together. I feel lucky to have found someone that I am sexually compatible with on the first try.</p> <p>...</p> <p>I have a fear that I will never love anybody as much as I love you and my heart will go unfulfilled.</p> <p>...</p> <p>I have a fear that i would be leaving before we ever had the chance to truly experience one anthers love. I have a fear that i will marry one of the pathological narcissists and then you will call and tell me that you love me.</p>
11/30/12	<p>My Dearest Darling</p> <p>I am at a total loss. I thought that you had wanted to see me before I departed. Perhaps you just have a busy month with the holiday season upon us. I was so looking forward to seeing you. I have a present for you and wanted to share a night with you. You are my forever love. I don't like when you are so far away from my heart, There are so many things that I want to share with you. I am full of desire for you.</p> <p>...</p> <p>I still want you to take the time to think about you... then think about you and me and us. I want us to feel the essence of our beings together. I have zero desires at this time copulate with anyone other than yourself. You are my forever love.</p> <p>...</p> <p>We have reached a time and point to experience us. I would love to experience the feeling of loving you and touching you and making love to you any time I want. I would like you to actually know me and feel me and to know the inside and outside of my being. I do not want to waste anymore time. Do you really want 33 years to go by and only to have imagined what it would have been like to actually know one another. I love you. Nothing about you bothers me. You are perfect to me. I know because I know. I see things that you do not see. When I feel you I feel a whole different side of me.</p>

DATE	EMAIL
1/15/13	<p>Where you and I are running into a problem is I love you so much. I still love spending time with you. I still love every kiss you place on my body. I still love the inside of you with every fiber of my being. I guess you can not see that I love you.</p> <p>I have a hard time understanding why you think that anywhere inside of me is a place that would ever hurt you. Even if someone hurts me very badly and is completely out of line in doing so I would make no attempt to hurt them back. In 12 years have you every heard me speak in any manner that would lead you to believe that I am capable of causing harm or injury to you? It is almost offensive. I go so far out of my way to help everyone. Even people that I do not want to help. Even if you for some reason decided you hated me and brought great harm upon my life I still would not hurt you. I would feel only that it was meant to be and that what happened is between you and something greater in the universe that you have to work out with the universe. I would not feel that it was between you and I.</p>
1/15/13	<p>This has been going on my entire adult life. I have always loved you. From the very first time I ever seen you. Love was already built in. Happiness was already there every time I seen you smile. I had no ability to foresee our future or where we would be at today. Michael I do not want ton abandon you I do not want you to think that I do not love you. I absolutely do. I can remember every single solitary detail of the first day we met and the first time I came to see you. I was always so happy to see you. I never went to see you because I was a prostitute and wanted to earn money.</p> <p>I did not even really understand all of that stuff yet. I could not have been in Dallas for very long when I met you. I arrived in late February and I met you within a couple of days of your birthday. I must have been there only a couple of weeks. The situation in that place was completely different from anyplace I had ever been in.</p> <p>I never ever thought that that is how you looked at me.</p> <p>...</p> <p>I am not angry about anything at all. I am still happy that we shared every single second that we shared. I am so very grateful for your presence in my life. If I had my choice I would never have let you go from the first day I met you.</p>
6/9/13	<p>Beautiful love...</p> <p>Can you drive over here with your airplane tomorrow to see me? You don't have to stay overnight. You can go back home. It only takes 40 min for you to arrive here. I can meet you near the burbank airport. They have hotels over there. I seen them when I go to the airport to fly to see you. I never go to burbank so I do not know much about it. I can find out. I wanted to see you before I leave.</p>
6/25/13	<p>The frequency in my brain that is hooked up to you is different. It is more consistent. I can actually feel if you are closer or further away from me in proximity. This is one of the reasons I have really fought the rest of my emotions to try and maintain our relationship. There is something between us that is not the normal frequency. It operates from the inside. Not thru speech or normal methods of communication.</p> <p>I do not know why it is there however it exists. I think it will help the world a lot. I have this plan. That later as more information downloads to my brain I will give you the information and you will give the information to the world. I do not like any exposure. Because I am the way I am. And I have this heightened sensory system I do</p>

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	<p>not have any desire to be in the public eye. I mostly like to be very quite and do the work that I do. I can be very talkative but other times I do very solitary projects. I think better that way. I think you should be the president and I am going to give you all of the information that you require.</p> <p>The frequency that I know exists between you and I has become stronger over time. I am able to see and feel more.</p> <p>...</p> <p>Do not ever think that I have ever felt you were a horrible person. I have never ever thought that</p> <p>...</p>
7/15/13	<p>My Sweetest Love</p> <p>Are you going to call me soon? Or ever to talk to me about this. I understand you are busy. However I am really really upset and I am not likely to feel better until you talk to me about us.</p>
7/17/13	<p>Yes I am upset very upset more upset than I have ever been. I do not like being so upset it feels like I am stuck in cement. Something is going on somewhere with someone that I love that is out of alignment. I have been thru this before in my life. Where I am insistent there is a problem and nobody listens to me.</p> <p>...</p> <p>For some reason you are unable or unwilling to see the facts that I am presenting to you. Fine.... I do not mind. We can not change what has already happened anyways. We can only change the future. Something is not right at the moment. I do not know what it is if I could see you I would be able to see more specifically. I will try to look at my screen later. I really do not feel like it right now because I do not want to see anything that is going to upset me even more.</p> <p>...</p> <p>If you love me you have to think of me also. You can ask yourself this question would you still love me the same if I had imposed all of this upon us????????????? I did not put a wedge between us I have waited more than a decade just to share one day that is all about you and I and our love. I have yet to see that one uninterrupted day that is all about Michael and Amber. I love you and I guess I never want to lose you I try my best.</p> <p>...</p> <p>The universe put us together for specific reasons one so that we could understand unconditional love.</p>
7/27/13	<p>Beautiful Love</p> <p>Our love is once in a lifetime, There a connection of love that defies explanation. This relationship has a connection that goes beyond this life time. I hope you are receiving the love I send you everyday.</p>

1 **Email Excerpt Sent By Mr. Goguen to Ms. Baptiste ending the relationship:**

DATE	EMAIL
10/3/13	<p>2 Sorry I haven't had time to connect by phone since I got back from my hunting trip, nor</p> <p>3 have I had time to get back to your long text messages.</p> <p>4 ...</p> <p>5 I've told you repeatedly in the past that your "radar" about [my wife] is 100% off-kilter,</p> <p>6 and therefore I didn't want to keep hearing your accusations. I love [my wife] and all</p> <p>7 my children very much, and I'm very happy raising my family just the way it is.</p> <p>8 ...</p> <p>9 I don't exactly know where to go from here in the Michael-Amber story. I don't like</p> <p>10 you to feel negative or judgemental emotions about others that I think are beneath the</p> <p>11 high quality of your character, nor do I want you to feel the continued unhappiness that</p> <p>12 seems inherent in our situation. On the other hand, I don't want to have to associate any</p> <p>13 thought or interaction I have with you, with the bad feelings that are brought on by</p> <p>14 your constant comments and judgements about my home situation.</p> <p>15 ...</p> <p>16 It may take a clean break for a few years, but I hope we can eventually end up in a</p> <p>17 place where there are only positive thoughts, feelings, and positive communication</p> <p>18 between us. In the meantime, I hope you can focus all of the intense love and positive</p> <p>19 energy in your heart on making the lives of little girls in need better, happier, and more</p> <p>20 filled with love and security.</p>

15 **Email Excerpt Sent By Ms. Baptiste to Mr. Goguen in response:**

DATE	EMAIL
10/4/13	<p>17 My most beautiful love</p> <p>18 My heart is broken</p> <p>19 ..</p> <p>20 I feel like there is not one thing that a woman could offer you that I didn't offer you.</p> <p>21 ...</p> <p>22 All of these years together and there is such a barrier. I truly do love you. I do Michael.</p> <p>23 There are different layers of a human being. The part where all of this exists between</p> <p>24 us brings me great joy and it brings me the greatest sadness I have ever felt. And the</p> <p>25 greatest sadness comes When after all that I tried for and fought for And you sit in</p> <p>26 front of me and tell me I am the same as a women who has lived her life completely</p> <p>27 different than I have lived mine.</p> <p>28 ...</p> <p>29 I am not willing to live in LA at all anymore. I am not willing to take any chance that I</p> <p>30 will run into your wife. Hopefully she will not start rolling out red carpets for herself in</p> <p>31 NYC. It would be to much. I told you that if you are happy then I am happy but don't</p> <p>32 mix the energy field. It is like poison for my being. She and I are different.</p>