

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, LAW DIVISION

AMY JACOBSON, JAIME ANGLADA,)
and AMY JACOBSON, as Next Friend of)
Their Children, JOHN DOE and JAMES)
DOE,)

Plaintiffs,)

v.)

CBS, BROADCASTING, INC., a Foreign)
Corporation, JOSEPH AHERN, CAROL)
FOWLER, MIKE PUCCINELLI, ROB)
JOHNSON, MICHELE WELDON, and)
TRACY REARDON,)

Defendants.)

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LAW DIVISION

JURY DEMANDED

COMPLAINT AT LAW

NOW COME Plaintiffs, AMY JACOBSON, JAIME ANGLADA, and AMY JACOBSON, as Next Friend of their children, JOHN DOE and JAMES DOE, by and through their attorneys, KATHLEEN T. ZELLNER & ASSOCIATES, and complaining of Defendants, state as follows:

Introduction

On July 5th, 2007, Amy Jacobson was well on her way to fulfilling most of her dreams. She was a well-respected television investigative journalist; some would say the best in the business. Four Emmys in four years showed industry wide recognition of her talent and dedication. She was happily married with two beautiful children.

By July 10th, 2007, Amy Jacobson's life was shattered. She had lost her job, would eventually lose her home, and experienced enormous public humiliation and

disgrace. Her husband and children suffered from observing the devastating effects on the person they love most. Her four year old son still cries when it is mentioned that his mother lost her job.

The infamous videotape at the center of the storm had one hundred fifty thousand (150,000) viewers on the first day it was played. More than a million stories and comments quickly followed on the internet. Defendant CBS, with the sole motive of boosting its sagging ratings, first aired an edited videotape and story portraying Plaintiff Jacobson as an adulteress and disreputable reporter. CBS collaborated with a Northwestern journalism professor to suggest that Plaintiff Jacobson's actions were criminal and blatantly unethical.

The CBS story had devastating, far reaching effects on Plaintiff Jacobson. For example, it became the basis for a Law & Order episode portraying a reporter having an affair with a murder suspect to get the suspect's story. Even the reporter's swimming suit and towel were the same color as the Plaintiff's. Adding insult to injury, the reporter also turned out to be the murderer. If there is any doubt about the current industry wide perception of Amy Jacobson, the Law & Order episode makes it crystal clear that the perception is that Ms. Jacobson is an adulteress and a completely unethical person. Apparently it is permissible to heap further scorn upon her. Defendant Weldon opened that door by publicly stating, "who knows what else she has done in her career."

CBS employees, in an effort to justify their story as being "newsworthy" misrepresented to the public that a CBS cameraman shot the videotape. In reality a homeowner, Defendant Tracy Reardon, shot the videotape simply because she had a grudge against Craig Stebic and intensely disliked Amy Jacobson. Defendant Reardon

tipped off CBS about the presence of Plaintiff Jacobson at the Stebic home and that she was making a videotape of the Stebic backyard. Apparently CBS wanted to elevate the story to the lofty height of "newsworthiness" rather than tell it like it was; a disgruntled individual trying to interject herself into a police investigation by harassing and spying on her neighbor. The videotape provided no new information in the investigation of Lisa Stebic's disappearance. In fact CBS vice-president and news director Defendant Carol Fowler said it best, "We didn't see much compelling reason to air it because it wasn't germane to the case." The one and only reason the videotape was aired was to remove a competitor and the best journalist from the case. As of this date Lisa Stebic remains missing.

In an effort to defend their blatant invasion of privacy Defendant CBS misrepresented numerous other facts to the public including: why the videotape was shot, how CBS learned of the videotape, and that the videotape only portrayed what the "neighbors" could see in "clear view." CBS employees wanted the public to believe that Plaintiff Jacobson had a sexual liaison with Craig Stebic. The videotape was carefully edited in an attempt to create the appearance of an "illicit" relationship. The CBS stories were carefully crafted to convey that Plaintiff Jacobson and Craig Stebic were having a sexual relationship. The simple truth is that Defendants violated common law and Illinois law in airing the videotape and story in the first place. Defendants were informed of this but chose to proceed anyway by distorting the facts to justify their actions.

Even the well-known and discredited CBS defense of "fake but accurate" won't work this time; because the story is both fake and inaccurate. Amy Jacobson, her

husband Jamie Anglada, and their two children have been permanently and devastatingly injured by Defendants' actions and words.

Parties

1. Plaintiff Amy Jacobson, at all relevant times, was a citizen of the State of Illinois and resided in the County of Cook.

2. Plaintiff Jaime Anglada, at all relevant times, was a citizen of the State of Illinois and resided in the County of Cook.

3. Plaintiff John Doe, a minor, at all relevant times was a citizen of the State of Illinois and resided in the County of Cook

4. Plaintiff James Doe, a minor, at all relevant times was a citizen of the State of Illinois and resided in the County of Cook.

5. Defendant CBS Broadcasting, Inc. (hereinafter referred to as "Defendant CBS"), at all relevant times, was a citizen of the State of New York and doing business in the State of Illinois, County of Cook, as WBBM, also known as CBS-2, a CBS-owned and operated station in Chicago.

6. Defendant Joseph Ahern (hereinafter referred to as "Defendant Ahern"), is sued in his individual capacity, and at all relevant times, resided in the State of Illinois.

7. At all relevant times, Defendant Ahern was an employee of Defendant CBS, serving in the capacity of President and General Manager of CBS-2, Chicago.
8. Defendant Carol Fowler (hereinafter referred to as “Defendant Fowler”), is sued in her individual capacity, and at all relevant times, resided in the State of Illinois.
9. At all relevant times, Defendant Fowler was an employee of Defendant CBS, serving in the capacity of News Director for CBS-2, Chicago.
10. Defendant Mike Puccinelli (hereinafter referred to as “Defendant Puccinelli”), is sued in his individual capacity, and at all relevant times, resided in the State of Illinois.
11. At all relevant times, Defendant Puccinelli was an employee of Defendant CBS, serving in the capacity of Bureau Chief for DuPage County and Will County, for CBS-2.
12. Defendant Rob Johnson (hereinafter referred to as “Defendant Johnson”), is sued in his individual capacity, and at all relevant times, resided in the State of Illinois.
13. At all relevant times, Defendant Johnson was an employee of Defendant CBS, serving in the capacity as reporter for CBS-2, Chicago.

14. Defendant Michele Weldon (hereinafter referred to as “Defendant Weldon”), is sued in her individual capacity, and at all relevant times, resided in the State of Illinois.

15. At all relevant times, Defendant Weldon was an apparent agent of Defendant CBS.

16. Defendant Tracy Reardon (hereinafter referred to as “Defendant Reardon”), is sued in her individual capacity, and at all relevant times, resided in the State of Illinois.

Jurisdiction and Venue

17. Jurisdiction is proper in this Court as these claims are brought under the common law and statutory law of the State of Illinois.

18. Plaintiffs, at all relevant times, resided in the State of Illinois, County of Cook.

19. Defendant CBS, Inc. is a citizen of the state of New York, and at all relevant times, conducted business in the State of Illinois, County of Cook.

20. Defendants Ahern, Fowler, Puccinelli, Johnson, Weldon, and Reardon, at all relevant times, resided in the State of Illinois.

21. The broadcasts by Defendant CBS, that give rise to many of Plaintiffs' claims were generated out of Chicago, Illinois, County of Cook.

Facts

22. Plaintiff Jacobson first thought about becoming a reporter in kindergarten, when she would watch Fahey Flynn on the ABC Channel 7 noon news. She grew up in the Chicago area.

23. In furtherance of her goal to become a reporter, Plaintiff Jacobson graduated Phi Beta Kappa, with a 3.94 GPA, from the University of Iowa with a degree in communications and film in 1991.

24. After graduating from college, in just a little more than a decade, she progressed from needing food stamps to earning more than \$100,000 a year as an award-winning Chicago reporter.

25. In an effort to be hired in the Chicago market, Plaintiff Jacobson lived in five different states from 1992-1996. She worked at different stations in Cedar Rapids, Iowa; Alexandria, Minnesota; El Paso, Texas; Tucson, Arizona and Detroit, Michigan. She worked as a general-assignment reporter, assignment editor, morning anchor/producer, and photographer/editor.

26. As a result of all of her hard work, she finally had the opportunity to return to her hometown of Chicago.
27. From 1996-2007, Plaintiff Jacobson was a general assignment reporter for WMAQ also known as NBC-5, an NBC-owned and operated station in Chicago.
28. On July 6, 2007, Plaintiff Jacobson was a reporter for NBC 5; an NBC owned and operated station in Chicago. She enjoyed the reputation of being a dedicated reporter, working long hours and giving her employer exclusives on many stories.
29. Plaintiff Jacobson won four Emmy awards in four years for outstanding reporting.
30. She advanced her career in the Chicago market by cultivating sources who provided her with information other reporters failed to obtain. Much of her success was because people trusted her.
31. Plaintiff Jacobson worked long hours, whether it was during her scheduled shift or at home in the early morning hours. Plaintiff monitored her stories constantly prior to arriving at the station. She worked many seventy hour weeks during her time at NBC-5.
32. Plaintiff Jacobson had a reputation throughout the industry for being a compassionate and caring reporter. Plaintiff Jacobson also had a reputation for

being an objective reporter, who was persistent in getting both sides of every story.

33. There was competitive rivalry between the Chicago news stations. Specifically there was intense rivalry between CBS-2 and NBC-5 in the summer of 2007.
34. One manifestation of this rivalry occurred on June 21, 2007, when Plaintiff was in St. Louis, and received a tip that a major incident was occurring in Will County, Illinois, on the Christopher Vaughn case. Despite being out of town she pursued the tip and NBC got the story.
35. Defendant Puccinelli, the CBS Will County and DuPage County Bureau Chief, was furious. A CBS assignment editor accused NBC of “stealing” CBS’ footage for this story. CBS lagged behind the other two major networks in market share.
36. In late June and early July, there also was extensive media attention on the Lisa Stebic case. Lisa Stebic disappeared from her home on April 30, 2007. Lisa was married to Craig Stebic and had two children. The couple was in the process of divorcing.
37. Plaintiff Jacobson was assigned to the Lisa Stebic case. Plaintiff quickly established a rapport with Lisa Stebic’s family and Craig Stebic’s family. She

wanted to be fair to both sides since she had learned from the Kevin Fox case not to rush to judgment.

38. Plaintiff quickly became one of the favorite journalists of both families because of her tireless efforts to find out what happened to Lisa Stebic. She was also highly respected by local authorities in Will County. She broke most of the major stories on the case. Defendant Puccinelli had very limited success in reporting on the case and had alienated Craig Stebic, for Stebic did not trust him.
39. On July 6, 2007, Plaintiff Jacobson had a day off. She planned to take her two children to swim at her local health club. She received a phone call, inviting her to come to the Stebic house to talk about the case, specifically, about a story that Defendant Puccinelli had done on Craig Stebic.
40. Plaintiff decided to let her children swim for a short period of time at the Stebic residence with Jill Webb's (Craig Stebic's sister) three children. After that, she intended to discuss the case and the Puccinelli story with Craig Stebic and Jill Webb outside the presence of the children, inside the residence.
41. The Puccinelli story had aired on July 5, 2007, on CBS. The story had incorrectly named Mr. Stebic as "a person of interest" in the investigation of his wife's disappearance. It was not until July 14th, 2007, that Craig Stebic was named by authorities as "a person of interest" in the investigation of his wife's

disappearance. He has never been named as a "suspect" in the matter nor has the case been reclassified as a murder.

42. At no time did Craig Stebic or his sister represent that this was going to be an "adult pool party" or in any way portray the purpose of this meeting as being "social." The clearly expressed purpose of inviting Plaintiff Jacobson to the house was to discuss the case. Plaintiff had visited the Stebic home on several prior occasions to discuss the case. Defendant Puccinelli had tried to get similar invitations but for some reason the Stebic family did not trust him.
43. On that day, Plaintiff was wearing a two piece bathing suit. She got into the water very briefly with her two and three year old sons because neither child could swim. Plaintiff was never in close proximity to Craig Stebic, either in the water or at any other time. There is not a single shot on the raw videotape that shows Craig Stebic and the Plaintiff having any interaction at all. Upon exiting the pool Plaintiff immediately wrapped herself in a beach towel that covered her from her waist to her ankles.
44. Contrary to later misrepresentations in a CBS story, Plaintiff was not using some "technique" to seduce Mr. Stebic into giving her information. He and his sister openly invited Plaintiff to the house to give her information about the case. Plaintiff did not have to do anything to get the information other than show up and listen.

45. Plaintiff did not put her children in harm's way. Craig Stebic to this day has custody of his two young children. If there were any evidence that he posed a danger to children, the Illinois Department of Children and Family Services would have removed them from his home. Additionally, two other adults and three other children were present at the house. Had any improper behavior occurred, it would have had a number of witnesses.
46. There was no improper behavior by the Plaintiff. There was no improper motive by the Plaintiff. She was invited to the Stebic home to receive information on the case. Plaintiff was serving in the dual capacity of mother and reporter while at the Stebic home. Her actions, as a mother, involved watching over her children as they swam in the pool.
47. The CBS Defendants received a tip from Defendant Reardon that Plaintiff Jacobson was at the Stebic house in the backyard with her children. Defendant Reardon began shooting the videotape of Plaintiff's Jacobson, John Doe and James Doe before Defendant Puccinelli arrived at her house. Defendant Reardon despised Craig Stebic and intensely disliked Plaintiff Jacobson. Defendant Reardon's motives in videotaping were purely malicious and she acted with reckless disregard in violating the law by shooting the videotape of Stebic's backyard and into his house.

48. Clearly Plaintiff Jacobson, Plaintiff John Doe, Plaintiff James Doe, Craig Stebic, his sister, her children and the other adult present had a reasonable expectation of privacy when they were in the Stebic house and backyard. The backyard was surrounded by a by a six foot high solid wooden privacy fence.

49. The only spot where the Stebic backyard and pool were clearly visible was the upstairs bedroom window of Defendant Reardon's home. However, the backyard was only visible if one used a telephoto lens to zoom in. One could not clearly identify the individuals with a naked eye at the distance from the Reardon home to the Stebic backyard.

50. The only house from which the videotape could have been shot was the Reardon house. The Reardon home stood ninety one (91) feet behind the Stebic house and was at a higher elevation. The neighbors' houses on either side of the Stebic house did not have upstairs windows that would allow anyone to see into the Stebic backyard or house.

51. Defendant Reardon also shot videotape that showed Plaintiff Jacobson inside the Stebic house. There was no point on any public right of way or other area accessible to the public where any videotape could be taken of the Stebic backyard, inside the patio door, or the swimming pool.

52. Defendant Puccinelli proceeded to the Stebic house to confirm Plaintiff Jacobson's presence and was refused entry. Defendant Puccinelli saw a vehicle outside of the home and called back to his station to have the license plate run and confirm the vehicle belonged to Plaintiff Jacobson. Someone on the assignment desk at CBS improperly ran the license plate, and confirmed it was Plaintiff Jacobson's vehicle.
53. Defendant Puccinelli called back to CBS, and on information and belief, was told by a superior, "why is she there and you aren't." That individual then stated to Defendant Puccinelli, "Go get her," thereby revealing the true motive for obtaining the videotape from Defendant Reardon which was to destroy Plaintiff Jacobson's reputation.
54. Defendant Puccinelli and his cameraman went to the home of Defendant Reardon and she gave them the original of the videotape. Defendant Reardon made no copies of the videotape. Defendant Reardon made a statement to Plaintiffs' investigator that it was she, and not a CBS photojournalist, who shot the original videotape.
55. Much later on July 6, 2007, after Plaintiff Jacobson left the Stebic home, Defendant Puccinelli went back to the Stebic house with his cameraman and shot footage to create the false impression that he was at the Stebic house because of

the case. In fact, the earlier conversation he had at the Stebic residence focused exclusively on the presence of Plaintiff Jacobson.

56. On July 6, 2007, Puccinelli maliciously fed the videotape back to the CBS station in Chicago for everyone there to view.

57. CBS spread the word throughout the Chicago media market that they were in possession of the videotape. Plaintiff, through an agent, contacted CBS, and requested the videotape not be aired. This agent spoke with Defendant Fowler, who represented the videotape had “fallen into their laps” and they were not going to air the footage. Clearly, by saying this Defendant Fowler was acknowledging that CBS had not made the videotape.

58. Despite this assurance, a dramatically edited version of the videotape was aired on July 10, 2007. Because CBS represented they were not going to air the videotape Plaintiff Jacobson did not pursue a Temporary Restraining Order to prevent the videotape from being shown until a judge could assess whether there had been a violation of the law. Lisa Stebic’s family requested that the videotape not be aired and praised Plaintiff Jacobson’s work on the case.

59. CBS tried to justify their decision to air the videotape by saying that two major newspapers had already “reported” the story and therefore the story was “newsworthy.” Actually the stories reported by the two major newspapers came

from information disseminated by CBS. CBS aired the edited videotape at 5:00 a.m. on the day the two major newspapers published their stories. Obviously, the CBS story with the edited videotape reached the public first.

60. The first CBS story that ran on July 10, 2007, lasted one minute and forty-three (43) seconds and is the reason Plaintiff Jacobson lost her job. Even the title of the story suggested a sexual motive by Plaintiff Jacobson. The story was called, "Bikini Clad Reporter Filmed at Home of Missing Mom." The clear intent of this title is that Plaintiff was trying to take the place of Lisa Stebic by making a social visit to the Stebic home in a bikini. (Story as published on Defendant CBS' website attached and incorporated herein as "Exhibit 1").

61. The story was narrated by Alita Guillen, who stated that a Chicago reporter was "in hot water over her technique in pursuing a source in the disappearance of Lisa Stebic." The obvious intent in using the word "technique" is to imply that Plaintiff was using sex to pursue her source when in fact the information had been offered to her with no strings attached.

62. Guillen went even further in suggesting an improper motive on Plaintiff Jacobson's part by saying that Plaintiff had visited the house "frequently." Guillen also stated, "why she has been there is unclear while she has been covering the story. She has never mentioned any social relationship with Stebic or his family." Again the clear implication of these statements is to make the viewer

think Plaintiff was not at the Stebic residence to cover the story but because she had a “social relationship” with Craig Stebic. Defendant CBS wanted the viewers to believe that the relationship was sexual in nature. Defendant CBS only showed sixteen (16) seconds of the six minutes and twenty (20) seconds long videotape.

63. Defendant CBS edited the videotape by juxtaposing an image of Craig Stebic putting his shirt on with one of Plaintiff Jacobson in her halter top and towel. The image of Stebic was taken from the end of the videotape, while the image of Plaintiff Jacobson was taken from the beginning of the six minutes and twenty seconds videotape. This editing was done to create the appearance that sexual activity had occurred between Stebic and Jacobson. The truth is that there was absolutely no interaction of any kind between Plaintiff Jacobson and Craig Stebic on the entire videotape.

64. Plaintiff Jacobson was fired because of this particular story and videotape. CBS had not released the entire six minutes and twenty (20) seconds of videotape so NBC did not have access to the raw footage to accurately see what CBS had done to distort the story.

65. The sexual theme was carried on throughout the CBS reporting on July 10th, 2007 evening news when they learned Plaintiff Jacobson had been fired. Defendant Johnson reported that Plaintiff Jacobson had, “blurred the lines between business

and pleasure.” (Story entitled “Some Defend Actions of Local Reporter Caught on Controversial Video” as listed on Defendant CBS’ website attached and incorporated herein as “Group Exhibit 2”).

66. Airing the deceptively edited videotape was not enough. In addition, the CBS defendants enlisted the assistance of Defendant Weldon in their efforts to discredit Plaintiff Jacobson and damage her reputation. Defendant Weldon is an assistant journalism professor at Northwestern University, who does not specialize in journalism ethics. Defendant Weldon’s statements and opinions were directly contrary to those of journalism ethics professors around the country.

67. Defendant Weldon, as an apparent agent of CBS, continued the portrayal of Plaintiff in a false light, making comments such as, "It's going to make the audience and her colleagues and her competitors question what else she has done." (See Exhibit 1).

68. Defendant Weldon also stated in reference to Plaintiff Jacobson, "While it's not a heinous crime it erodes all of our credibility as journalists." Defendant Weldon’s statement implied that Plaintiff Jacobson had committed some crime, albeit not a heinous one and that she was unethical in her business practices. (Story entitled “Reporter Leaves NBC Amid Stebic Controversy” attached and incorporated herein as “Exhibit 4”).

69. Both claims by Defendant Weldon constitute defamation per se.
70. On July 12, 2007, Defendant Ahern wrote a letter to the Chicago Sun Times. Though the Sun Times refused to publish it, it was published on CBS' website, defending Defendant Ahern's decision to air the videotape. Several blatant misrepresentations were made in this letter, including that CBS took care to digitally conceal the identities of the children. Plaintiffs John Doe and James Doe's faces were clearly visible when the videotape was first aired. (Letter as published on CBS' website attached and incorporated herein as "Exhibit 3").
71. Defendant Ahern next claimed that the entire six minute raw videotape was posted on CBS' website. However, Defendant Ahern neglected to mention that the videotape was not posted until after Plaintiff Jacobson was fired. At first CBS only ran the sixteen second, edited version of the videotape that put an image of Plaintiff Jacobson with a towel around her waste juxtaposed with an image of Stebic putting his shirt on to create the impression that there was some sexual relationship between the two. (See Exhibit 3).
72. Defendant Ahern recklessly and maliciously made the decision to air the videotape because of CBS' sagging ratings. His news director, Defendant Fowler, stated, "We didn't see much compelling reason (to air it) because it wasn't germane to anything in the case." Fowler also said, "why was it newsworthy, it had no context," and it was "unfortunate" if the videotape "detracts from the

search for Lisa Stebic.” (Story as published in the Chicago Sun Times, attached and incorporated herein as “Exhibit 5”; See also Group Exhibit 2, “CBS 2 VP/News Director On Decision to Use Videotape”).

73. Additionally, when the story aired, CBS showed Plaintiffs’ children’s faces. Plaintiff Jacobson’s husband, Plaintiff Anglada, called Defendant Fowler to request that the videotape not be aired again, because his children’s faces were clearly visible. CBS denied his requests, only blurring the children’s faces in later broadcasts.
74. Neither the story that was aired nor the videotape itself had a scintilla of newsworthiness that would justify its nefarious publication. In addition to airing the edited videotape on CBS, the Defendants also placed the edited footage on the CBS website for the entire worldwide public to download. CBS later touted the videotape as the most viewed videotape of 2007 and placed the edited version in the most accessible place to viewers. (Story as published on Defendant CBS’ website attached and incorporated herein as “Exhibit 6”).
75. All versions of the edited videotape placed Plaintiff Jacobson in a false light.
76. Defendant CBS eventually released the full six minute footage that Defendant Reardon filmed. However, they continued to show the edited footage with each story to portray Plaintiff Jacobson as an adulteress and an unethical reporter.

77. In an unusual and possibly unprecedented reaction to the public disapproval of the story, on July 11, 2007, Defendant Fowler led off a newscast explaining to the public why CBS chose to air the videotape. She stated, "We didn't see much compelling reason (to air it) because it wasn't germane to anything in the case." (See Exhibit 5; see also Group Exhibit 2).
78. Defendant Fowler also represented in an article published on July 11, 2007, that the videotape "fell into their lap." This contradicts Defendants' representations that a CBS cameraman shot the videotape. (See Exhibit 5).
79. Defendant Fowler acted maliciously and with reckless disregard as to the consequences of her actions
80. On July 12, 2007, in the evening news broadcast, Defendant Johnson, in the lead story, falsely represented to the public that the footage of Plaintiffs Jacobson, John Doe and James Doe was shot by a CBS-2 cameraman in the presence of Defendant Puccinelli. (Story as published on Defendant CBS' website "Origins of Controversial Jacobson-Stebic Video" attached and incorporated herein as "Exhibit 7").
81. Defendant Johnson knew or should have known that the story he was reporting as to the origin of the videotape was false and had no newsworthiness.

82. This story was a clear attempt to conceal Defendant CBS' malicious motives in obtaining the footage, editing the footage and airing the footage.

83. On July 9, 2007, Plaintiff Jacobson met with NBC executives regarding the existence of the videotape. At that juncture no decision had been made to discipline, suspend or terminate Jacobson.

84. As a direct result of the edited videotape being aired on July 10, 2007, Plaintiff was terminated from her employment that same day.

85. Since that date, Plaintiff has made many attempts to gain employment in the news industry. The search has led her from Tampa, FL; to Washington D.C.; to Phoenix, AZ, to Los Angeles, CA and many places in between. Stations have refused to even interview her because of the videotape and the false light Defendants placed her in.

86. One station executive told Plaintiff that she was "toxic" in the industry.

87. Plaintiffs have suffered severe emotional distress and financial loss as the direct result of Defendants' actions.

88. Plaintiffs have suffered public humiliation as the direct result of Defendants' actions.
89. Plaintiffs were forced to sell their home as a result of the severe financial losses caused by Defendants' actions. Plaintiffs had worked extremely hard to purchase their dream home, and now, rent a small apartment with their two children that is within sight of their former home.
90. The actions by all Defendants were done with malice, in that they knew, or should have known, that the videotape was obtained improperly, was edited in such a manner as to portray Plaintiff Jacobson as an adulteress and unethical reporter, knew the footage was not newsworthy and that the commentary on the videotape was defamatory per se.

Count I

State Law Claim: Intrusion Upon Seclusion
Plaintiffs Amy Jacobson, John Doe and James Doe
Defendants CBS, Puccinelli, and Reardon

91. Plaintiffs herein incorporate and re-allege the allegations contained in paragraphs 1-90 as paragraphs 1-90 of this Count I.
92. The conduct of Defendants CBS, Puccinelli and Reardon invaded the privacy of and intruded on the seclusion of Plaintiffs by videotaping and/or spying on them.

93. The conduct of Defendants CBS, Puccinelli and Reardon was offensive and objectionable to a reasonable person.

94. Defendants CBS, Puccinelli and Reardon, by videotaping and/or spying on Plaintiffs intruded into private matters of Plaintiffs.

95. As a proximate result of Defendants' conduct, Plaintiffs have suffered and continue to suffer extreme mental anguish, extreme suffering, severe emotional distress, financial losses, and ongoing medical bills.

WHEREFORE, Plaintiffs Amy Jacobson, John Doe and James Doe respectfully request that this Court enter judgment in their favor and against Defendants CBS, Puccinelli and Reardon for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count II

State Law Claim: False Light

Plaintiff Amy Jacobson

Defendants CBS, Ahern, Fowler, Puccinelli, Johnson and Weldon

96. Plaintiff herein incorporates and re-alleges the allegations contained in paragraphs 1-95 as paragraphs 1-95 of this Count II.

97. The conduct of Defendants CBS, Ahern, Fowler, Puccinelli, Johnson and Weldon placed Plaintiff Amy Jacobson in a false light.

98. The false light in which Defendants CBS, Ahern, Fowler, Puccinelli, Johnson and Weldon placed Plaintiff Amy Jacobson was highly offensive to a reasonable person.

99. Defendants CBS, Ahern, Fowler, Puccinelli, Johnson and Weldon had knowledge of the falsity of the publicized matter and the false light in which Plaintiff was placed.

100. Defendants CBS, Ahern, Fowler, Puccinelli, Johnson and Weldon acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff was placed.

WHEREFORE, Plaintiff Amy Jacobson respectfully requests that this Court enter judgment in her favor and against Defendants CBS, Ahern, Fowler, Puccinelli, Johnson and Weldon for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count III

State Law Claim: Misappropriation for Commercial Use
Plaintiffs Amy Jacobson, John Doe and James Doe
Defendant CBS

101. Plaintiffs herein incorporate and re-allege the allegations contained in paragraphs 1-100 as paragraphs 1-100 of this Count III.

102. Defendant CBS appropriated Plaintiffs' likenesses for its benefit.

103. Defendant's appropriation was without Plaintiff Jacobson or Plaintiff Anglada's consent.

WHEREFORE, Plaintiffs Amy Jacobson, John Doe and James Doe respectfully request that this Court enter judgment in their favor and against Defendant CBS for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count IV
State Law Claim: Right of Publicity Act 765 ILCS 1075/1 et seq
Plaintiffs Amy Jacobson, John Doe and James Doe
Defendant CBS

104. Plaintiffs herein incorporate and re-allege the allegation contained in paragraphs 1-103 as paragraphs 1-103 of this Count IV.

105. Defendant CBS used Plaintiffs' identity for the purpose of advertising and promoting products.

106. This use was during Plaintiffs' lifetime.

107. Defendant did not obtain previous written consent from Plaintiff Jacobson or Plaintiff Anglada.

108. Defendant's use of Plaintiffs' identity was not for the purpose of reporting news.

WHEREFORE, Plaintiffs Amy Jacobson, John Doe and James Doe respectfully request that this Court enter judgment in their favor and against Defendant CBS for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count V

State Law Claim: Intentional Infliction of Emotional Distress

Plaintiff Amy Jacobson

Defendants CBS, Ahern, Fowler, Puccinelli, Weldon and Johnson

109. Plaintiff herein incorporates and re-alleges the allegations contained in paragraphs 1-108 as paragraphs 1-108 of this Count V.

110. The above described conduct of Defendants CBS, Ahern, Fowler, Puccinelli, Weldon and Johnson was truly extreme and outrageous.

111. Defendants intended their conduct to cause severe emotional distress to Plaintiff.
112. Defendants knew that there was at least a high probability that their conduct would cause severe emotional distress to Plaintiff.
113. Defendants, by and through their conduct, did in fact cause Plaintiff severe emotional distress.
114. As a proximate result of Defendants' conduct Plaintiff has suffered and continues to suffer extreme mental anguish, severe emotional distress, financial loss and ongoing medical bills.

WHEREFORE, Plaintiff Amy Jacobson respectfully requests that this Court enter judgment in her favor and against Defendants CBS, Ahern, Fowler, Puccinelli, Weldon and Johnson for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count VI
State Law Claim: Defamation Per Se
Plaintiff Jacobson
Defendants CBS, Ahern, and Fowler, and Weldon

115. Plaintiff herein incorporates and re-alleges the allegations contained in paragraphs 1-114 as paragraphs 1-114 of this Count VI.

116. The above described comments made by Defendant Weldon were defamatory per se; in that they accused Plaintiff of committing a crime.

117. The above described comments were defamatory per se, in that they implied Plaintiff Jacobson was an adulteress.

118. Defendants CBS, Ahern, Fowler and Weldon caused these statements to be widely published in the media. This publication was undertaken with malice and Defendants knew the statements were false.

119. Defendant Weldon made the aforesaid statements with malice, knowing they were false.

120. As a proximate result of Defendants' conduct, Plaintiff has suffered and continues to suffer extreme mental anguish, severe emotional distress, financial loss and ongoing medical bills.

WHEREFORE, Plaintiff Amy Jacobson respectfully requests that this Court enter judgment in her favor and against Defendants CBS, Ahern, Fowler and Weldon, for

compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count VII

State Law Claim: Tortious Interference with a Business Relationship

Plaintiff Amy Jacobson

Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon

121. Plaintiff herein incorporates and re-alleges the allegations contained in paragraphs 1-120 as paragraphs 1-120 of this Count VII.

122. At the time of the acts and conduct of Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon, Plaintiff, Amy Jacobson, had a valid business relationship from which she profited professionally and economically.

123. At the time of the acts and conduct of Defendants, Defendants knew that Plaintiff, Amy Jacobson, had a valid business relationship from which she profited professionally and economically.

124. The acts and conduct of Defendants as set forth above interfered with the valid business relationship possessed by Amy Jacobson.

125. Defendants' conduct proximately caused Plaintiff, Amy Jacobson, to suffer great economic damage as well as future damage to her career.

WHEREFORE, Plaintiff Amy Jacobson respectfully requests that this Court enter judgment in her favor and against Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count VIII

State Law Claim: Tortious Interference With a Business Expectancy
Plaintiff Amy Jacobson
Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon

126. Plaintiff herein incorporates and re-alleges the allegations contained in paragraphs 1-125 as paragraphs 1-125 of this Count VIII.
127. At the time of the acts and conduct of Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon, Plaintiff, Amy Jacobson, had reasonable expectations of entering into numerous valid business relationships from which she would have profited professionally and economically.
128. At the time of the acts and conduct of Defendants, Defendants knew that Plaintiff, Amy Jacobson, had reasonable expectations of entering into numerous valid business relationships from which she would have profited professionally and economically.

129. The acts and conduct of Defendants as set forth above interfered with the reasonable expectations of entering into numerous valid business relationships possessed by Amy Jacobson.

130. As a result of the acts and conduct of Defendants as set forth above, although she had reasonable expectations of entering into numerous valid business relationships, Plaintiff, Amy Jacobson, did not enter into those business relationships.

131. The acts and conduct of Defendants as set forth above caused Plaintiff, Amy Jacobson, to suffer great economic damage as well as future damage to her career.

WHEREFORE, Plaintiff Amy Jacobson respectfully requests that this Court enter judgment in her favor and against Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon, for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Count IX

State Law Claim: Loss of Consortium

Plaintiff Jaime Anglada

Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon

132. Plaintiff herein incorporates and re-alleges the allegations contained in paragraphs 1-131 as paragraphs 1-131 of this Count IX.

133. The acts and conduct of Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon, set forth above, wrongfully and proximately caused Plaintiff, Jaime Anglada, to suffer a loss of consortium with Amy Jacobson.

134. At all times relevant, Plaintiff Jaime Anglada was the lawful husband of Plaintiff Amy Jacobson.

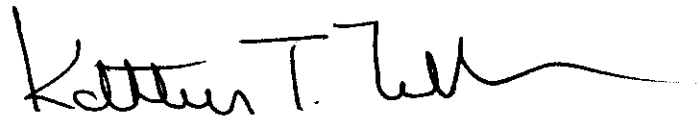
135. As a direct result of the conduct of Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon, set forth above, Plaintiff, Jaime Anglada, was deprived of the financial support of Amy Jacobson, her companionship, her felicity, sexual relations and related losses.

WHEREFORE, Plaintiff Jaime Anglada respectfully requests that this Court enter judgment in his favor and against Defendants CBS, Ahern, Fowler, Puccinelli, Johnson, Weldon and Reardon, for compensatory damages in an amount in excess of One Million Dollars (\$1,000,000.00), for punitive damages, for costs, and for any and all other relief that this Court deems just.

Jury Demand

Plaintiffs Amy Jacobson, Jaime Anglada, and Amy Jacobson as Next Friend of her minor children, John Doe and James Doe, hereby demand a trial by jury on all issues so triable.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kathleen T. Zellner", written over a horizontal line.

Kathleen T. Zellner

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