

# SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

ESRĀ DUNCA-SPRAWLING,

also known as SEAN SPRAWLING,

Plaintiff,

v.

FACEBOOK (now META), BLUEFISH AI, EZRA INC., UNFOLD PSYCHOLOGY, ILLUMINA  
SAFETY, PEER RESPONCE, and DOES 1-50, inclusive,

Defendants.

Case No. To be assigned by the court.

COMPLAINT FOR DAMAGES, INJUNCTIVE RELIEF, AND DECLARATORY RELIEF

JURY TRIAL DEMANDED

## **I. JURISDICTION, VENUE, AND PARTIES**

1. This Court has jurisdiction over this action pursuant to California Code of Civil Procedure § 410.10, as the causes of action arise from acts and omissions that occurred within the State of California, and Defendants have transacted business and/or committed tortious acts within this state.
2. Venue is proper in the Superior Court of California, County of San Francisco, pursuant to California Code of Civil Procedure § 395.5, as the Defendants are corporations and have transacted business, or a substantial amount of the tortious acts alleged against Plaintiff were committed, within this county, including, but not limited to, the San Francisco residence at 565 Ortega Street.
3. Plaintiff ESRĀ DUNCA-SPRAWLING, professionally known as SEAN SPRAWLING, is a resident of California and is a producer, actor, writer, and cultural ambassador. Plaintiff is also the first American male Geisha, having received formal recognition and adoption into the Matsunoya Corporation, a prestigious Geisha house, through

a mentorship with Eitaro Matsunoya. Plaintiff's inclusion was based on rigorous performance, traditional training, and familial acceptance.

4. Defendant FACEBOOK (now META) is a Delaware corporation with its principal place of business in California.
5. Defendant BLUEFISH AI is a corporation or entity doing business in California. Plaintiff alleges that Bluefish AI, in concert with the other Defendants, is a central figure in the conspiracy described herein.
6. Defendant EZRA INC. is a corporation or entity doing business in California. Plaintiff alleges that Ezra Inc., in concert with the other Defendants, is a central figure in the conspiracy described herein.
7. Defendant UNFOLD PSYCHOLOGY is a corporation or entity doing business in California. Plaintiff alleges that Unfold Psychology, in concert with the other Defendants, is a central figure in the conspiracy described herein.
8. Defendant ILLUMINA SAFETY is a corporation or entity doing business in California. Plaintiff alleges that Illumina Safety, in concert with the other Defendants, is a central figure in the conspiracy described herein.
9. Defendant PEER RESPONCE is a corporation or entity doing business in California. Plaintiff alleges that Peer Responce, in concert with the other Defendants, is a central figure in the conspiracy described herein.
10. The true names and capacities of Defendants sued herein as DOES 1-50, inclusive, are unknown to Plaintiff at this time, who therefore sue said Defendants by such fictitious names. Plaintiff is informed and believes, and on that basis alleges, that said Defendants are in some manner responsible for the acts and omissions and for the injuries and damages herein alleged. Plaintiff will amend this complaint to state their true names and capacities when ascertained.

## **II. STATEMENT OF FACTS**

11. This action seeks damages for a multifaceted and coordinated conspiracy of organized crime and civil violations that has been perpetrated against the Plaintiff. The conspiracy's objectives are to cause Plaintiff's bankruptcy and to gain control of his spouse's multi-million dollar estate. Plaintiff believes that his spouse, Andrei George Dunca, is also a potential victim of this conspiracy.
12. Plaintiff and his spouse, Andrei George Dunca, entered into a valid informal marriage under the laws of the State of Texas in 2018. The couple continued their marital relationship through uninterrupted cohabitation and public representation as spouses, including joint occupancy of their San Francisco residence at 565 Ortega Street and the Houston property at 13339 Balmore Circle. They shared financial accounts, business ventures, and legal documents affirming mutual responsibility.

13. The conspiracy, which Plaintiff believes may have roots extending as far back as 2015, became apparent in September 2022. The individual co-conspirators with backgrounds in technology formed a criminal enterprise using their joint venture, LiveRail, which was acquired by the co-conspirator Facebook (now Meta) in 2014.
14. In or about September 2022, Mr. Dunca abruptly ceased communication and financial support, causing a cascade of legal, emotional, and financial harm to Plaintiff. Plaintiff avers that Mr. Dunca has been missing since late 2022, and his disappearance, coupled with the ongoing conspiracy, has caused Plaintiff to suffer severe emotional distress and has led to the loss of joint property. Plaintiff alleges that the Defendants and their principals are directly responsible for Mr. Dunca's disappearance and current status.
15. The Defendants, through their corporate officers and agents, engaged in a pattern of psychological abuse and professional misconduct during a therapeutic relationship with Plaintiff. Defendants are alleged to have fabricated diagnoses, obstructed Plaintiff's legal filings, and coordinated with third parties to sabotage Plaintiff's reputation.
16. The sophisticated cyber attack against Plaintiff was allegedly perpetrated by the Defendants' corporate principals and agents. Plaintiff alleges that these individuals had access to Plaintiff's husband's network and capital, as well as expertise in the technology used to commit the crimes. This technology, which included sophisticated cyber-attack and advanced Artificial Intelligence (AI) technology, was developed and deployed by the Defendants Bluefish AI, Ezra Inc., Illumina Safety, and Peer Responce. The conspirators allegedly used phishing emails, fraudulent webpages, and deceptive attachments to install malware, spyware, and Trojan programs on Plaintiff's devices, orchestrated from multiple states and international locations.
17. The Defendants, as corporate entities, have a fiduciary and ethical duty to their investors, staff, and partners. Their failure to investigate and address the criminal use of their technology or assets by their principals and agents is a direct breach of this duty, putting their business interests and the security of their staff at risk.
18. As part of this conspiracy, Defendants also worked to sabotage Plaintiff's legal and emotional standing. This included fabricating a diagnosis of "drug-induced psychosis" to discredit the Plaintiff and prevent him from entering into agreements. Plaintiff's communications were intercepted, altered, and blocked, intentionally isolating him from legal and emotional support.
19. Plaintiff alleges that the Defendants, through their agents, acted with retaliatory intent, motivated by personal vengeance, financial opportunism, and a desire to conceal a romantic affair between their agent and Mr. Dunca.
20. Plaintiff alleges that Defendants are directly or indirectly responsible for the actions and omissions of their corporate principals, agents, and employees, and for all damages resulting therefrom. Plaintiff further alleges that the conspiracy is a

continuing series of new crimes, discovered as recently as this past month, which are a direct result of the defendants' failure to protect and their willful ignorance of the crimes their network and capital are enabling.

21. The facts supporting these claims, as well as the evidence of the conspiracy and the damages incurred, are more fully described in the attached exhibits, which are incorporated by reference herein.

22. Subsequent to the filing of this Complaint, and with the stated facts now a matter of public and legal record, the individuals having access, means, and background as described herein have an obligation to investigate out of concern for the public, their investors, and to stop the intentional infliction of emotional and financial distress they are more than capable of stopping. If not responsible, they have an obligation to aid in bringing domestic and international terrorists to justice. They have an obligation to the American people and the world.

### **III. CAUSES OF ACTION**

Plaintiff asserts the following causes of action against Defendants FACEBOOK (now META), BLUEFISH AI, EZRA INC., UNFOLD PSYCHOLOGY, ILLUMINA SAFETY, PEER RESPONSE, and DOES 1-50, inclusive, individually and collectively.

#### **A. Intentional Infliction of Emotional Distress (Cal. Civ. Code § 43)**

23. Defendants, and each of them, through their principals, agents, and employees, engaged in a deliberate and sustained campaign of psychological manipulation, digital harassment, and reputational sabotage that was intended to destabilize Plaintiff's emotional well-being. Their conduct was extreme and outrageous, exceeding all bounds of decency in a civilized society, and directly caused Plaintiff to suffer severe emotional distress.

24. The conduct includes, but is not limited to, the alleged disappearance of Plaintiff's spouse, false imprisonment, torture, and sexual assault, which constitutes a knowing and reckless disregard of the probability of causing severe emotional distress.

#### **B. Invasion of Privacy (Cal. Civ. Code § 1708.8; Cal. Const., Art. I, § 1)**

25. Defendants, through their principals, agents, and employees, knowingly and intentionally accessed Plaintiff's private communications, devices, and accounts through unauthorized digital means. These intrusions resulted in the manipulation of legal documents, impersonation of Plaintiff in official filings, and the unauthorized use of his personal data, constituting a severe violation of his constitutional and statutory right to privacy.

#### **C. Negligence / Professional Malpractice (Cal. Civ. Code § 1714)**

26. Defendant UNFOLD PSYCHOLOGY, as a provider of psychological services, owed a professional duty of care to Plaintiff. It breached this duty through the negligent acts and omissions of its agents and employees, including patient abandonment, misuse of professional diagnosis, and a breach of confidentiality, causing Plaintiff to suffer damages.

27. This breach of the standard of care caused, among other things, the fabrication of a "drug-induced psychosis" diagnosis to discredit the Plaintiff and obstruct his pursuit of legal remedies.

#### D. False Imprisonment (Cal. Civ. Code § 43)

28. Defendants, and each of them, through their principals, agents, and employees, intentionally confined Plaintiff for an extended period without his consent or legal authority, through means of physical intimidation, psychological coercion, and technological manipulation, including threats to his spouse and family.

#### E. Civil Conspiracy

29. Defendants, and each of them, entered into an agreement with one another to commit the wrongful acts alleged herein.

30. The tortious acts of each Defendant, committed in furtherance of the conspiracy, are legally attributable to all conspirators.

31. The underlying torts that form the basis of this civil conspiracy claim are Intentional Infliction of Emotional Distress, Invasion of Privacy, False Imprisonment, and Fraud, as alleged in the preceding and subsequent paragraphs.

#### F. Fraud (Cal. Civ. Code §§ 1709, 1710)

32. Defendants, through their principals, agents, and employees, made false representations regarding the circumstances surrounding the financial scheme and the abandonment of Plaintiff's spouse, with the intent to deceive and induce Plaintiff to continue professional and personal relationships. Plaintiff justifiably relied on these misrepresentations, which directly led to the financial losses and emotional distress alleged.

#### G. Unjust Enrichment

33. Defendants have unjustly enriched themselves at the Plaintiff's expense through a pattern of deceit, manipulation, and unauthorized use of his financial resources and property.

#### **IV. PRAYER FOR RELIEF**

Plaintiff ESRĀ DUNCA-SPRAWLING, also known as SEAN SPRAWLING, respectfully requests that the Court enter judgment in Plaintiff's favor and grant the following relief:

##### **A. General Damages**

For general damages in an amount to be proven at trial, including emotional distress, reputational harm, and loss of consortium resulting from Defendants' conduct.

##### **B. Special Damages**

Plaintiff seeks full restitution for all financial damages incurred as the direct and proximate result of the tortious acts and crimes perpetrated against Plaintiff. These damages include, but are not limited to:

- \$2,750,000 for the loss of half of the value of the marital community property at 565 Ortega Street, San Francisco, California.
- \$400,000 for the loss of the last verifiable offer on the marital community property at 13339 Balmore Circle, Houston, Texas.
- \$835,299 for the outstanding principal and interest on a personal loan.
- \$70,000 for the lost security deposit on the commercial property at 420 N. Camden Drive, Beverly Hills, California.
- \$200,000 for investment capital lost in the business "Gion BH".
- \$720,000 for estimated lost revenue from "Gion BH".
- \$1,000,000 for emotional distress and loss of property for the refusal to return "The Captain Dunca-Sprawling," who served as Plaintiff's emotional support animal.
- \$2,000,000 for other unspecified special damages and pain and suffering.
- \$30,000,000 for the loss of creative and commercial projects caused by the destruction of Plaintiff's production companies.
- The full amount paid for professional services, plus consequential damages including lost revenue and attorneys' fees associated with addressing the misconduct.

The total of these damages is \$7,975,299, plus the additional amounts listed above, subject to further adjustment based on discovery, forensic accounting, and judicial review.

##### **C. Punitive Damages**

For punitive damages in an amount sufficient to punish Defendants and deter others from similar conduct, pursuant to California Civil Code § 3294.

#### D. Declaratory Relief

For a judicial declaration affirming the informal marital union between Plaintiff and Andrei George Dunca under Texas law, and recognizing the symbolic and legal significance of shared property, financial interdependence, and public acknowledgment.

#### E. Injunctive Relief

For preliminary and permanent injunctive relief enjoining Defendants from further interference with Plaintiff's property, reputation, business operations, and marital status.

#### F. Attorneys' Fees and Costs

For reasonable attorneys' fees, expert witness fees, and costs of suit incurred herein, pursuant to applicable statutes and equitable principles.

#### G. Other Relief

For such other and further relief as the Court may deem just and proper, including, but not limited to:

- A five percent (5%) perpetual share from the co-conspirators Ezra, Bluefish, Peer Responce, Illumina Safety, and any other entities established by the members of LiveRail following their acquisition by Facebook, whose technology, network, capital, investment, or employees are found to have a connection with any part of the cyber attack against Plaintiff.
- Injunctive relief including license termination, property access restoration, and foreclosure prevention.
- Corrective actions and disciplinary sanctions.
- Relief against the co-conspirator Facebook (now Meta) for their negligence and breach of duty in providing the resources that enabled the attack.
- Any other relief the Court deems just and proper.

#### H. Judicial Order for Appearance of Co-Conspirator

Plaintiff respectfully requests that the Court issue an order for the immediate appearance of Andrei George Dunca, a co-conspirator and Plaintiff's spouse, to confirm his safety and to allow a judicial determination as to his state of sound mind and memory, and that his condition has been maintained as such since his last personal interaction with Plaintiff.

## **V. CONCLUSION**

Based on the foregoing allegations and causes of action, Plaintiff ESRĀ DUNCA-SPRAWLING has suffered significant and demonstrable damages as a direct and proximate result of the Defendants' conspiratorial, intentional, and tortious conduct. The requested relief is necessary and appropriate to redress these harms, punish the Defendants for their outrageous actions, and deter similar misconduct in the future.

Respectfully Submitted,

**ESRĀ DUNCA-SPRAWLING**

/S/ ESRĀ DUNCA-SPRAWLING

President, Esrā Dunca-Sprawling INC

Manager, Andrei George Dunca LLC

Plaintiff, In Pro Per



## **VERIFICATION**

I, ESRĀ DUNCA-SPRAWLING, declare as follows:

I am the Plaintiff in this action. I have read the foregoing Complaint for Damages, Injunctive Relief, and Declaratory Relief and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**ESRĀ DUNCA-SPRAWLING**

/S/ ESRĀ DUNCA-SPRAWLING

President, Esrā Dunca-Sprawling INC

Manager, Andrei George Dunca LLC

Plaintiff, In Pro Per

## EXHIBIT LIST

EXHIBIT A: Copy of Complaint filed by Andrei George Dunca against Rodney Samuel Sprawling in Harris County, Texas (Case No. 2025-03-13F\_Dunca\_Complaint\_and\_TRO\_85\_\_-signed\_1DAE78D7.pdf). This exhibit includes a Temporary Restraining Order and is offered as evidence of the conspiracy and the fraudulent use of a legal system to manipulate and harm Plaintiff.

EXHIBIT B: Medical Report from Dr. Richard Austin Heafey, Psy.D., dated July 29, 2024. This exhibit includes Dr. Heafey's initial clinical opinion and notes, confirming Plaintiff's sanity and sobriety. This report is offered as evidence of a fraudulent mental health diagnosis later created by the conspirators.

EXHIBIT C: A copy of the deed for the property at 13339 Balmore Circle, Houston, Texas 77069. This exhibit is offered as evidence of the informal marriage between Plaintiff and Mr. Dunca.

EXHIBIT D: A copy of the deed for the property at 5823 Queensgate Drive, Houston, Texas 77066. This exhibit is offered as evidence of the informal marriage between Plaintiff and Mr. Dunca.

EXHIBIT E: A compilation of legal filings submitted by Plaintiff in various jurisdictions related to this case. This exhibit documents Plaintiff's persistent attempts to seek legal and judicial relief despite the alleged obstructions by the Defendants.

- Exhibit E.1-Exhibit A: Request for Judicial Review and Intervention on June 2, 2025.
- Exhibit E.2-Exhibit B: Urgent Request for Judicial Intervention: Allegations of Harassment and Obstruction of Justice on June 4, 2025.
- Exhibit E.3-Exhibit C: Motion to Enforce Revocation of Power of Attorney and for Sanctions on June 4, 2025.
- Exhibit E.4-Exhibit D: Updated Motion to Enforce Revocation of Power of Attorney and for Sanctions on June 4, 2025.
- Exhibit E.5-Exhibit E: Amended Motion for Declaratory Judgment Confirming Domestic Partnership Status, Motion to Enforce Termination of Plaintiff's Legal Representation, And Motion to Enforce Revocation of Power of Attorney and for Sanctions.
- Exhibit E.6-Exhibit F: Petition for Declaratory Judgment Confirming Marital Status, Petition for Permanent Injunction to Halt the Sale of Real Property, Petition for Judicial Review and Intervention.
- Exhibit E.7-Exhibit G: Third-Party Petition for Wrongful Foreclosure and Unlawful Eviction, Declaratory Relief on Title to Real Property.
- Exhibit E.8-Exhibit H: Motion to Strike.

- Exhibit E.9-Exhibit I: Request for Default Judgment.
- Exhibit E.10-Exhibit J: Plaintiff's Response to Defendant's Motion to Strike.

EXHIBIT F: Social Media Posts of Alexandru Daniel Tantu. This exhibit includes social media posts that document Defendant Tantu's relationship with Andrei George Dunca, and posts that suggest his motives of vengeance, jealousy, and financial gain in orchestrating the conspiracy against the Plaintiff.