



**COMP**

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CASE NO: A-21-842248-C  
Department 21

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

VICTORIA DELAGUERRA-SEAMAN, a  
resident of the State of Nevada,

Plaintiff,

vs.

JOHN DOE, an individual; and DOES 1-10 and  
ROE CORPORATIONS 1-10, inclusive,

Defendants

Case No.:  
Dept. No.:

**COMPLAINT**

Plaintiff Victoria DeLaGuerra-Seaman, by and through her counsel of record, Kevin E. Beck, Esq., of Kevin E. Beck, Ltd., for her Complaint against John Doe and the other defendants, complains, avers, and alleges as follows:

**THE PARTIES**

1. Victoria DeLaGuerra-Seaman (“Plaintiff” or “Seaman”) is, and was at all times relevant to this action, an individual who is a resident of Clark County, Nevada.

2. Seaman is informed and believes and therefore alleges that John Doe, an individual whose identity is currently unknown to Seaman is, and was at all times relevant to

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1 this action, an individual who is a resident of Clark County, Nevada. Because Seaman does  
2 not know the true identity of John Doe, she has brought this action and identified John Doe by  
3 a fictitious name. Seaman will seek leave to amend her Complaint to insert the true identity of  
4 John Doe once she ascertains the same.

5  
6 3. Seaman does not know the true names of the individuals, corporations,  
7 partnerships, and entities sued and identified in fictitious names as DOES 1 through 10 and  
8 ROE CORPORATIONS 1 through 10. Seaman is informed and believes and thereupon alleges  
9 that each of said defendants are responsible in some manner for the events and happenings and  
10 proximately caused the injuries and damages alleged herein and may include individuals,  
11 corporate entities, companies, joint ventures, agents, principals, business enterprises, partners  
12 and partnerships, employees, independent contractors and/or employers of and related to  
13 defendants. Plaintiff will seek leave to amend this Complaint to allege their true names and  
14 capacities as they are ascertained.

15  
16 4. This Court has subject matter jurisdiction over this Complaint pursuant to Article  
17 VI of the Nevada Constitution, and personal jurisdiction over John Doe, as such jurisdiction is  
18 not inconsistent with the Nevada Constitution or the United States Constitution.

19  
20 5. Venue is properly located in Clark County, Nevada in accordance with NRS  
21 13.010(1) and NRS 13.040, based on the facts and circumstances alleged in this Complaint and  
22 the communications at issue are directed toward residents of, and potential voters living in,  
23 Clark County, Nevada.

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25 6. Seaman has suffered damages in excess of \$15,000, giving this Court jurisdiction  
26 over this matter.

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**GENERAL ALLEGATIONS**

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7. At all times relevant hereto, Seaman is and was the duly elected Las Vegas City Councilwoman for Ward 2.

8. Seaman was elected in the June 11, 2019 Special Election and her term extends into 2022, when she will be seeking reelection.

9. In or about September of 2021, Defendants created and published a website on the world wide web at [www.concouncilwoman.com](http://www.concouncilwoman.com), which includes any subpages and linked articles, pages, or information. Collectively, this material is referred to herein as “The Website.”

10. Defendants created The Website and its content, which focuses primarily on Seaman and contains various defamatory allegations about Seaman’s personal and professional matters.

11. The Website has been modified since its initial publication on or about September 8, 2021 to alter and add additional content.

12. Defendants created content on the website that they knew to be false in an effort to defame Seaman and to paint her in a false light.

13. Defendants caused the information on The Website to be published on the world wide web and have caused links to The Website to be sent out to various residents and voters in Clark County, Nevada via email.

14. Seaman is informed and believes that links to The Website were distributed by emails to hundreds of recipients at a time.

15. The Website includes numerous misrepresentations and mischaracterizations intended to deceive the public that include, but are not limited to, the following:

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- False and misleading statements regarding lawsuits that Seaman has been involved in over the years, including misrepresentations of injuries suffered, results obtained, and the underlying facts supporting claims;
- False reports that Seaman has a history of an arrest in San Bernardino, including a suggestion that the arrest was for driving under the influence;
- False allegations that Seaman has “abandoned her mentally ill daughter on the street after using legal trickery to swindle her mentally ill offspring out of an inheritance left to Christina by her now deceased grandparents;”
- Multiple images of an individual The Website falsely claims to be Christina Delaguerra, along with false representations that Seaman “abandoned” her child and “discarded Christina like a piece of trash;”
- False statements asserting Seaman “claim[ed] the inheritance rightly left to Christina by her grandparents;” and
- Fabricated claims of “eyewitness reports” of Seaman’s purported infidelity.

16. Seaman is informed and believes that the Defendants have published false and misleading information about her with a knowledge that it was untrue.

17. Defendants have caused damages to Seaman in both her career and with her reputation.

**FIRST CAUSE OF ACTION**

**Defamation**

18. Seaman repeats and incorporates the allegations set forth above as if restated herein.

19. Defendants have made false and defamatory statements concerning Seaman.



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1 **THIRD CAUSE OF ACTION**

2 **Intentional Misrepresentation**

3 31. Seaman repeats and incorporates the allegations set forth above as if restated  
4 herein.

5 32. Defendants, through The Website, made repeated false representations regarding  
6 Seaman.

7 33. Defendants knew the representations were false or had an insufficient basis or  
8 information for making the representations.

9 34. The false representations were published to and intended to be relied upon third  
10 parties who either viewed The Website or received a link to The Website via email.

11 35. Seaman is informed and believes that various recipients relied upon the content  
12 of The Website as being truthful.

13 36. Seaman has sustained actual damages as a result of the statements.

14 37. Seaman was required to retain counsel to prosecute this action and is entitled to  
15 recover her incurred attorney's fees and costs from Defendants.

16 WHEREFORE, Seaman prays for judgment as follows:

- 17
- 18 1. An award of general damages in an amount in excess of \$15,000, to be
  - 19 determined at trial, to compensate Seaman for the damages suffered;
  - 20 2. An award of punitive damages;
  - 21 3. An award of attorney's fees and costs; and

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

DATED this 6th day of October, 2020.

KEVIN E. BECK, LTD.

/s/ Kevin E. Beck  
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