

VIRGINIA

CIRCUIT COURT OF ALEXANDRIA CITY

FILED
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JONATHAN
CLERK OF COURT

John Peppe

Plaintiff,

vs.

Civil Action No. CL 2010-8321

Random House Inc.
1745 Broadway
New York, New York 10019
SERVE: Secretary of the Commonwealth

and

Gary C. Schroen
5000 Domain Pl.
Alexandria, VA 22311,

Defendants

COMPLAINT

COMES NOW the Plaintiff, John Peppe, by counsel, and demands judgment and award of execution against the Defendants, Random House, Inc. and Gary C. Schroen, and as grounds therefore states as follows:

1. Plaintiff is a resident of the Commonwealth of Virginia.
2. Defendant, Gary C. Schroen is a resident of Alexandria City, Virginia.
3. Random House, Inc. is a corporation incorporated under the laws of New York with principal office in New York City, engaged in the business of publishing and distributing books in said state and throughout the United States including the Commonwealth of Virginia.

4. In 2007 Defendants printed and published a book entitled "First In, An Insiders Account of How the CIA Spearheaded the War on Terror in Afghanistan" by Presidio Press, an imprint of the Random House Publishing Group, a division of Defendant, Random House, Inc., and began its distribution and sale throughout the United States including the Commonwealth of Virginia. At all times involved herein, Plaintiff was an agent employed by the Central Intelligence Agency (CIA). The incidents described in said publication were true and involved activities of the Plaintiff within his employment with the CIA.

5. At all times involved herein, Plaintiff was employed by the Central Intelligence Agency (CIA).

6. The incidents described in said publication were true and involved activities of the Plaintiff within his employment with the CIA.

7. References within the text of the book to the Plaintiff were carefully disguised by the use of a false name for the Plaintiff for it was understood that the Plaintiff was, at the time, acting as an covert employee of the Central Intelligence Agency whose identity should not be revealed.

8. Notwithstanding the foregoing, the Defendants did, between pages 192 and 193 of said book, produce and publish clear photographs (not modified to protect identity) showing Plaintiff's picture in several of the photographs.

9. The publication of the pictures aforesaid is an invasion of privacy of the Plaintiff.

10. When this discovery was made, Plaintiff, by counsel, contacted Defendant and in response Defendant offered to take immediate action to reduce further damages and damages to Plaintiff, all as set forth in Exhibit A.

11. In spite of the promises contained in Exhibit A, Plaintiff's picture was thereafter prominently displayed on or about November 23, 2009, on the internet with prominent pictures of the Plaintiff from the aforesaid book.

12. The internet publication of the book was under the control of the Defendant publishing house.


13. The Defendants' action invaded Plaintiff's right not to have his "Photograph" revealed or published to the public which publication and internet reproduction caused irreparable damage to the Plaintiff's career with the CIA's clandestine activities and potential to become subject to a fatwa, all to the damage of the Plaintiff in the sum of \$1,000,000.00.

WHEREFORE, Plaintiff, John Peppe, demands judgment against the Defendants, Random House Inc. and Gary C. Schroen jointly and severally, in the sum of \$1,000,000.00

Respectfully Submitted,


John Peppe

FRIEDLANDER, FRIEDLANDER & EARMAN, P.C.

By 
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Counsel for Plaintiff

**A COPY TESTE:
JOHN T. FREY, CLERK**

BY: 
Deputy Clerk

**Original retained in the office of
the Clerk of the Circuit Court of
Fairfax County, Virginia**