CARLI MICHELLE HELLER

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Plaintiff, in propria persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF MENDOCINO

CARLI MICHELLE HELLER, Plaintiff, v. VINCENT MICHAEL HYLER; JUDITH HYLER, also known as JUDY HYLER; MICHAEL HYLER, also known as MIKE HYLER; and DOES 1 through 10, Defendants.	Case No.: _____ **VERIFIED COMPLAINT FOR DAMAGES:** (1) Domestic Violence (Civ. Code, § 1708.6); (2) Aiding and Abetting Domestic Violence **DEMAND FOR JURY TRIAL** Unlimited Civil Case (amount demanded exceeds $35,000) Related cases: Nos. 26CV04599, 26CV04598

Plaintiff Carli Michelle Heller alleges:

THE PARTIES

1. Plaintiff is the mother of J.J.H., born September 6, 2024. She lives in Lee County, Florida.

2. Defendant Vincent Michael Hyler is the biological father of J.J.H. He lives in Redwood Valley, Mendocino County, California. Plaintiff and Vincent Hyler had a dating relationship, lived together, and have a child in common.

3. Defendant Judith Hyler, also known as Judy Hyler, is Vincent Hyler's mother. She lives on the same property in Redwood Valley.

4. Defendant Michael Hyler, also known as Mike Hyler, is Vincent Hyler's father and Judith Hyler's husband.

5. Plaintiff does not know the true names of Does 1 through 10 and sues them by those names under Code of Civil Procedure section 474. Each took part in, assisted, or encouraged the conduct alleged below. They include members of the Hyler family, whose names Plaintiff will add as their part is shown.

JURISDICTION AND VENUE

6. This Court has jurisdiction; the amount demanded exceeds $35,000. Venue is proper in Mendocino County because Defendants live here and the conduct alleged occurred here. (Code Civ. Proc., § 395, subd. (a).)

WHAT VINCENT HYLER DID TO PLAINTIFF, INCLUDING WHILE SHE WAS PREGNANT

7. Plaintiff did not choose California. She was exiled there, pregnant, 2,500 miles from anyone she knew, to live with Vincent Hyler on his family's property in Redwood Valley, without money, a car, or anyone of her own to call. From then on, the pressure on her, from him and from his family, never let up. On the March 15, 2025 recording he says so himself: “You weren't willin' to come with me. Your parents forced you to.” [00:22:06]

8. Vincent Hyler drew Plaintiff into the relationship, and into the pregnancy, with promises he did not keep: ordinary, reasonable promises that he would be responsible and that he would support her. She would never have been with him had she believed he would break them. On information and belief, he never meant to keep them.

9. Plaintiff did not understand that he was an alcoholic until she was in California, when it was too late. She lived in Maryland, and he flew out to see her; on

those visits he was not as he would be in California. When she found the mini liquor bottles he had hidden, he lied about them. She took what she saw, including the night described below, to be stress. Only in California did she understand, and only in hindsight did the bottles and that night make sense. His sisters later treated her as foolish for having believed him, as if she should have known.

10. While she packed in Maryland, he lay on the couch, disgustingly drunk, terrorizing her, telling her she was not really going to leave, and then ignoring her. He had already taken the mattress out of the bedroom, and she could not finish packing that night. Five months pregnant, she dragged a fourteen-inch-thick queen mattress up a steep staircase by herself so that she could sleep in a room she could lock.

11. Nothing Plaintiff did with Vincent Hyler in California was consensual. Throughout the relationship, including her pregnancy with J.J.H., he demanded sex daily, and she submitted, including to sodomy, because she was afraid of what he would do to her and to her son if she did not. He treated any refusal as proof of infidelity; under his threats, refusing was not safe. Her signature on J.J.H.'s birth certificate was given under the same fear. In January 2025 she began sleeping in a spare room to escape his demands, and her refusal became a source of his open resentment.

12. He held her down and struck her with his elbow in the night. Any sign that she was unhappy, withdrawn, or distracted he took as proof that she was thinking of another man, and he answered it with interrogation, accusations, physical restraint, screaming, and threats. Nothing she did could prove her fidelity to him, not even giving him access to her phone.

13. Early in the pregnancy, while she was stretching in bed with no phone anywhere near her, he came in and demanded to know whether she was texting. Then she could still tell him to turn on the light and look for himself. Later she was too afraid of him to answer back at all. Through all of it, on principle, she treated him with respect.

14. One night he came in and woke her to tell her, with an urgency unlike him, that he had been with a woman from the bar in his car and had paid her bar tab. He lied to her about nearly everything, his work, his money, his drinking, and had never before volunteered the truth about anything. He had no money of his own; he spent everything he had on drinking and paid for almost none of their food. And every day, he accused Plaintiff of infidelity.

15. On March 26, 2024, while she was pregnant, he left her a voicemail: “You think you're so fuckin' smart, huh? ... That kid — don't even try to tell me it's mine. ... You're gonna regret this. I'll make sure you do. You're nothing — nothing without me, you hear me?”

16. From the first weeks of the pregnancy, while Plaintiff was still in Maryland, Vincent Hyler denied that the child was his and accused her of being unfaithful. He refused to come to her prenatal appointments, saying he was not the father and that she was with another man. He reversed himself only after she was in California. On information and belief, Michael Hyler told him to take that position.

17. He withheld food and sleep from her as instruments of coercion, while she was pregnant and, most cruelly, right after she gave birth. He kept her from sleeping on purpose: waking her, coming in to yell at her, turning on the light when she was trying to sleep. He knew she had struggled with insomnia since she was a child, and he knew how little sleep a pregnant woman, and then a new mother terrorized all day, could get.

18. During the pregnancy her blood pressure reached levels requiring hospitalization at least twice. Her obstetrician sent her for testing to rule out preeclampsia; it was not preeclampsia. The cause was the sustained stress of the conditions Vincent Hyler kept her in.

19. During the pregnancy, when her body went into neurological crisis, convulsing and unable to breathe, he told her she was pretending.

20. Immediately after one of those hospitalizations, while she was pregnant, Vincent Hyler abandoned her for four days, without a car, food, water, money, or any means of transportation or communication, while he went on a drinking binge. He blocked her number and taunted her when she got through.

21. On the move to California he drank liquor while driving the U-Haul with her, pregnant, as his passenger, and afterward drove drunk on many occasions. During the pregnancy he drove her home from family events drunk and enraged, at dangerous speeds, until she had to beg him to stop so she could vomit.

22. Through the summer of 2024, the last months of her pregnancy, he did not work at all. Plaintiff, with no money of her own and a baby coming, was so frightened for her son that she could hardly breathe. He suggested that she go to work at his mother's restaurant as soon as she had given birth, and she was desperate enough to ask Judith Hyler for the job, afraid she would not be hired. It could never have happened: he made it impossible for her even to care for her son properly, and, exiled and without money, she had to ask her father for every dollar.

23. In her third trimester, in the summer heat, she was sick constantly, and he would not let her throw up. When she could not eat, he forced food on her that made her vomit more, and when she vomited, he said she was on drugs.

24. Once, while Plaintiff was cleaning her ear with a cotton swab, Vincent Hyler was drunk, and his arm hit her, driving the swab deep into her ear. The pain was severe, and her ear bled for several days. Plaintiff had never had an ear infection before. The one she has now is in the same place. On information and belief, it began with that injury.

25. J.J.H. was induced two weeks early, on September 6, 2024, as a direct result of her blood pressure.

26. While she was breastfeeding J.J.H., then under three months old, Vincent Hyler, intoxicated, swung an eighteen-inch machete-style blade back and forth about three feet in front of them.

27. After J.J.H. was born, Vincent Hyler made it nearly impossible for her to care for him. One night, exhausted, she knelt on the floor beside her baby and prayed over him. Vincent Hyler came in and demanded to know what the fuck she was doing on the floor.

28. In March 2025 the Mendocino County Superior Court issued a temporary restraining order against Vincent Hyler with firearm prohibitions, served on him on March 20, 2025. Among the firearms it reached was a shotgun he kept at Judith Hyler's residence; the order listed his firearms as a “shot gun and other guns at mother's house.” He never surrendered it. On July 6, 2026, the Circuit Court for Lee County, Florida, entered a temporary injunction against him, finding that Plaintiff “is a victim of domestic violence by Respondent” and that “there is immediate and present danger of domestic violence.”

29. The abuse injured Plaintiff's body and health, and it still does: blood pressure exceeding 200 systolic, for which beta blockers are prescribed; a fifteen-pound weight loss; emergency care on March 28, 2025; the failure of her milk at three months, and the damage to her breasts that followed; a nervous system left in a chronic defensive state; mast-cell (MCAS) flares now out of control, with restricted airways; and rashes unlike any she had ever had, painful like knives, that now cover her whole body without a single spot spared, every day for the last three months, and almost every day for many months before that; and days when she can barely breathe, eat, or drink.

30. The abuse was not a series of incidents. It was daily, it was merciless, and it did not let up. Plaintiff lived in terror, for herself and above all for her son, and that terror, more than anything else, is what has broken her body.

31. After Vincent Hyler stopped coming to J.J.H.'s medical appointments, Plaintiff told J.J.H.'s medical providers that he was an abusive alcoholic. J.J.H.'s medical record says so.

32. J.J.H. has been diagnosed with Sensory Processing Disorder and retained primitive reflexes. The clinician who evaluated him in June 2026 attributes his developmental disorders to his exposure to domestic violence before birth. Plaintiff has paid for his therapeutic care, at about $2,375 a month.

33. Vincent Hyler paid for nothing. Beyond his bar tabs, which his father paid, he met no financial obligation at all: not her care during the pregnancy, not J.J.H.'s needs, not J.J.H.'s therapy. He did not pay for food, except once or twice; Plaintiff's father paid for it the whole time, including Vincent Hyler's own lunches, or she would have starved. Every cost has fallen on Plaintiff, including the cost of protecting herself and J.J.H. in two states, and it has left her deeply in debt.

34. On February 25, 2025, intoxicated, he confronted Plaintiff at the front door as she came back from a run, asking, as he did every time she ran, even when she was eight months pregnant and running five miles a day only to survive the terror he kept her in, whether she was going to see someone else. He told her, “All your actions are saying you don't want this to work whatsoever,” and cut her off: “I don't care what you say, I'm telling you what I see.” The camera recorded it. To keep it from escalating, she left the house again on foot as it was getting dark.

35. On March 6, 2025, at about 7:06 p.m., he came home severely intoxicated and told Plaintiff, on camera: “You're fuckin' useless, Carli—just sittin' there like a goddamn lump!” and “This house is a fuckin' dump—where's my fuckin' dinner? You don't do fuck all!” At 7:17 p.m. he went on: “You're a fuckin' failure—a failure at everything!” In the same episode he picked up J.J.H., lost his balance, and fell backward over a coffee table with him in his arms. J.J.H. began crying loudly.

36. On March 14, 2025, sober, he left J.J.H. unattended on the changing table for more than five minutes. Plaintiff found J.J.H. near the edge, unsecured, and secured him. When she raised it, he answered that J.J.H. could have rolled off and that she did not even care.

37. On March 15, 2025, at about 2:08 p.m., he came home and began throwing rocks at Plaintiff's dog in the yard, chasing her as she cried out. When Plaintiff came out and told him to stop, he turned on her. For more than an hour and a half he followed her through the house while she, just out of the shower, was still wrapped in a towel, saying "Shut up, cunt … Fuck you!" and "What are you gonna do when your daddy dies?", and demanding that she pack her bags and leave at once.

PREMEDITATED: THE PLAN, IN HIS OWN WORDS, AND WHAT FOLLOWED

38. On the afternoon of March 15, 2025, in the home at 9501 Laughlin Way, Plaintiff told Vincent Hyler she was going to seek a domestic-violence restraining order. The home camera recorded his answer for thirty-nine minutes. He was drunk; his voice on the recording is loud and slurred.

39. Plaintiff had never thought of a custody case. She had never let herself think of anything but making the relationship last. For months Vincent Hyler had threatened her with a custody case, while she tried to make the relationship work. She had put up the home cameras to deter him, not to build a case. She told him openly, before doing anything, that she had to seek a restraining order. It was an ultimatum, given while she was still trying to make things work, because she had concluded she could no longer justify failing to protect herself and her son from him. Had she been planning a custody case, she would not have told him first. That is what began the recording. He got to the courthouse ahead of her, and she nearly did not obtain the restraining order.

40. He said: “The paperwork's filed. You brought it up. It's filed. And I'm goin' full custody.” [00:02:05] “You'll be filed with paperwork probably later this afternoon. I ain't fuckin' around. ... I tried to keep legality out of it 'til you called the cops.” [00:06:45] “Let's go to court, Carli. I ain't scared. You brought it up. Your idea. Let's fuckin' play.” [00:07:49]

41. He named what he would rely on: “My family's got money too.” [00:02:29] “You're not in this county with any judges — you think I don't have family that's already been in and out of this shit — ... a little bit of familiarity — more than what you've got.” [00:30:43]

42. He told her: “You think you're scared of me already? You've seen nothing yet!” and “I'm not done breaking you yet.”

43. He described the plan: “All I have to do is call the cops and you are gone — you're not a breastfeedin' mother — you don't have to take the boy with you — I know — I've done my homework.” [00:31:40] “I don't care if you're here or not, but he's not leavin'.” [about 00:16:48] He told her that her phone and her insurance would be canceled [00:18:34], and: “you will be bein' served Monday.” [00:27:58]

44. By then Plaintiff's milk had stopped, at about three months, under the stress of his abuse. In one brief period when he stopped the worst of it, her milk came back at once; when the abuse resumed, it stopped again. He then told his family she was neglectful. His words on the recording, “you're not a breastfeedin' mother … you don't have to take the boy with you … I've done my homework,” show that he had looked into what her breastfeeding meant for whether J.J.H. would stay with her. On information and belief, ending it was part of his plan.

45. On the same recording he said: “The only thing I'm gonna tell you is — I won't drink and drive with him — I haven't been drinkin' today — ... I'm gonna try my best to — not drink and drive.” [00:33:04] That afternoon, drunk, he took J.J.H. and

drove off with him, and blocked Plaintiff's attempts to reach him. She could not learn where J.J.H. was until about 3:00 a.m.

46. At about 3:00 a.m. on March 16, 2025, he came back to the front door and said, on camera: “Yeah, you're gonna open the fuckin' door ... if you don't, I'm gonna fuckin' kill you.” Then he left again with J.J.H.

47. At about 10:00 p.m. that night he came back intoxicated and resumed the abuse, telling her she was so full of shit and to shut the fuck up, and calling her a goddamn pig. Plaintiff shut herself in the bedroom, which had no lock, and pushed a dog crate against the door. At about 11:00 p.m., as she called 911, he forced the door open, damaging the frame. When deputies arrived, he refused to let them in, shouting “Fuck off!” and “You're not coming in here!” The deputies told her to seek a restraining order.

48. When he told her on the recording, pointing at her, that she would be “served Monday,” he knew what being served meant; Plaintiff did not, and did not learn it until 2026. That Monday, March 17, 2025, two days after the recording, he filed the petition that opened Mendocino County Case No. 25FL01030, seeking custody of J.J.H. Plaintiff spent that Monday at Project Sanctuary, drenched in sweat, trying to decide which incidents of abuse to write down when the abuse had been constant. When she left, she saw him crossing the street from the courthouse, his petition already filed. Her request for a restraining order, filed the next day, March 18, 2025, became Case No. 25FL01032, and the two cases were consolidated under his number.

49. On July 3, 2025, Plaintiff's restraining-order case was dismissed with prejudice. She did not know what “with prejudice” meant until 2026. Her claims against the lawyer who handled that dismissal are pending in Heller v. Farrington, No. 26CV04598.

50. The same thing happened each time Plaintiff sought protection. On June 15, 2026, she petitioned the Lee County court for protection from him. On July 6, 2026, the same day the Lee County court entered its injunction, Vincent Hyler requested an order to show cause re contempt against her in Case No. 25FL01030 over a visit of June 17, 2026. The court issued it on July 13, 2026.

51. That visit, June 17 through 24, 2026, had been set by an order of June 11, 2026 without the supervised step-up her custody order requires. Plaintiff could not, in conscience, send her son, and she declined it in writing on June 12. By then Vincent Hyler had pleaded guilty, on March 30, 2026, to driving under the influence with an admitted prior, although her custody order made his time with J.H. depend on his sobriety, and on June 8, 2026 J.H.'s clinician had attributed his condition to his exposure to domestic violence before birth. It is the only visit she has declined.

52. In June 2026, two months before J.J.H. was taken, Vincent Hyler, through his counsel, was already calling Plaintiff a kidnapper, for living with her son where her custody order allowed her to live, with family in Florida.

53. When Plaintiff declined that visit, she asked her lawyer to seek a writ. Her lawyer declined and left her, sending her a substitution-of-attorney form on June 15, 2026, and moving to be relieved as counsel on June 22; the court relieved him on August 6. Her two Lee County petitions for protection were then dismissed for non-appearance, never on the merits: the first on June 30, 2026, while she was ill, and the second, on which the Lee County court had found her in immediate and present danger, on July 20, 2026, after her child care fell through the night before the hearing. Twenty-three days later, with Plaintiff unrepresented and without an injunction, Vincent Hyler moved.

54. Seventeen months after the recording, he carried out what he had described. On August 12, 2026, the day after the court found at the contempt hearing that Plaintiff

had never been served with the order to show cause, he obtained an emergency order in Case No. 25FL01030 ex parte, on a declaration regarding notice recorded as "NOTICE NOT GIVEN," on a form whose domestic-violence, sexual-abuse and firearm boxes were left blank, although his own exhibits included the Lee County court's July 6, 2026 finding that Plaintiff was in immediate and present danger of domestic violence from him. In that application he swore that he had surrendered "the firearm referenced in the 2025 directive"; his own receipt of April 15, 2025 lists two rifles and no shotgun.

55. The only harm the August 12 order describes is that Plaintiff "has impeded visitation and concealed the child while not being able to properly care for him." Plaintiff concealed no one. She was living with J.H. in Lee County, Florida, where her custody order permits her to reside with family, caring for him and carrying out his therapy. The record of impeded visitation was one Vincent Hyler built himself: screenshots of iMessages sent to Plaintiff's number, which had been blocked to him since the restraining order, and not one of them is marked delivered.

56. On August 17, 2026, he petitioned the Circuit Court for Lee County, Florida, without notice to Plaintiff, to enforce the August 12 order. On August 19 that court signed the warrant his Florida counsel had drafted, exactly as drafted, with the footer "Proposed Emergency Ex Parte Order and Child-Pickup Warrant" on every page. It ordered that nothing be said to Plaintiff before J.H. was secured, sent deputies to the residential address that same court had sealed on her domestic-violence petition, and forbade removing J.H. from Florida without further order. That evening deputies took J.H. from Plaintiff's home in Bonita Springs. They refused to take his care protocol when she offered it. His therapy stopped that day.

57. Plaintiff went to the return hearing the warrant set for August 20, 2026. The courtroom had been changed, and by the time she found it the matter was over. The order entered afterward recites a hearing on August 21, of which she was given no

notice, and that she did not appear. Vincent Hyler's own exhibit shows J.H. at a clinic in Ukiah, California at 1:00 p.m. on August 26, 2026; the order permitting him to take J.H. out of Florida was filed at 1:11 p.m. Eastern on August 27. He has kept J.H. from Plaintiff since, and has never told her where he is.

58. On August 26, 2026, Vincent Hyler's counsel gave notice that the deputy who wrote the report of the August 19 removal would appear as his witness. On September 11 that deputy refused Plaintiff's report that J.H. was missing. On September 29, the evening after Plaintiff sent sworn complaints to the Mendocino County District Attorney and the State Attorney in Florida, he arrested her at her home. On October 26, 2026, the State dismissed the charge.

59. Plaintiff does not sue for the filing of any paper in any court. She pleads these facts because they show that Vincent Hyler's abuse was planned, that his threats were carried out, and the malice with which he acted.

WHAT JUDITH AND MICHAEL HYLER KNEW, AND WHAT THEY DID

60. Beginning in April 2024, while she was pregnant and before she had met them, Plaintiff pleaded by calls and texts with Judith Hyler, Michael Hyler, and Vincent Hyler's four sisters, Sierra, Loren, Jacqlyn, and Mikaela, for help with his drinking and jealousy. They acknowledged it and called it beyond resolution. Loren told her only to concentrate on having a healthy pregnancy.

61. Plaintiff was close to Judith Hyler. She trusted her, worked at that relationship for years, and turned to her again and again. Judith Hyler broke her heart.

62. Within her first weeks in California, pregnant, Plaintiff was hiding in Judith and Michael Hyler's bathroom asking them to come back quickly. Not one member of the Hyler family helped her. Instead his family made up stories about her, and turned each time she asked for help into an accusation against her. She told Sierra and Loren what he was doing to her; neither helped her.

63. Later, when Plaintiff was so incapacitated by terror and lack of sleep that she left J.J.H. with Loren for a night, Loren told Vincent Hyler, when he came for J.J.H., that the baby's head was too flat. Nothing was wrong with J.J.H.'s head: he liked to sleep on the back of it, and any flattening went away on its own. Whenever Vincent Hyler held J.J.H., he made a show of it, to make Plaintiff look neglectful. Plaintiff had asked her: “please, if you have any issues, you need to come to me first. I don't think you understand my situation.” It was the first story of “neglect” he would use against her, and the abuse grew worse after it.

64. On February 24, 2025, at about 6:45 p.m., he came home drunk and aggressive, shouting that Plaintiff never cared for J.J.H., and took J.J.H. from the living-room floor, where she was with him, into his bedroom. Plaintiff left in the car her parents had just bought her, because he controlled the only other one, and drove to Sierra's home, about a mile away, where she hid for about two hours. At 9:40 p.m. the home cameras showed him moving through the house in an agitated state, looking out the windows; that night they also recorded him, drunk, with J.J.H., screaming into the cameras and then turning them to face the wall. Plaintiff did not go home until he appeared to be asleep.

65. Vincent Hyler's sister Mikaela and her husband Anthony live in Potter Valley. Vincent Hyler went there every weekend and drank with Anthony, often taking J.J.H. there for up to ten hours on Saturdays over Plaintiff's objection, and came home intoxicated.

66. When Plaintiff, desperate for help, told Judith Hyler that Vincent Hyler was abusing her, Judith Hyler's answer, after discussing it with Vincent Hyler, was his: that Plaintiff was not giving him enough “attention” — meaning sex. It was the sex Plaintiff was already being coerced into, and the show of wanting it that he demanded of her. Plaintiff was already going out of her way to offer it before he asked, so that he would

not pick fights, elbow her in the night, or keep her from sleeping. Vincent Hyler treated what his family said about her as gospel, and used it against her.

67. Plaintiff sent the footage of the March 6, 2025 fall to Judith Hyler, Sierra, and Loren and asked for their help. They responded as if it were amusing.

68. On one of the first occasions Plaintiff called the police, she was at Judith Hyler's house. Judith Hyler looked at her and told her not to call the police, because Child Protective Services would probably take J.J.H.

69. Judith Hyler knew that Vincent Hyler drove drunk with J.J.H., again and again. She kept handing J.J.H. over to him.

70. In late 2024, after Vincent Hyler locked Plaintiff out of the bedroom where J.J.H. was, and then out of the house, Plaintiff went to Judith Hyler's door for help. Judith Hyler did not open it. Plaintiff called the police.

71. At about 12:20 a.m. on March 17, 2025, Plaintiff found J.J.H.'s crib empty and the front door wide open; Vincent Hyler had taken him without a word. When she reached Judith Hyler, after several attempts, Judith Hyler confirmed by text that J.J.H. was at her residence and declined to return him. On March 20, 2025, she came to Plaintiff's home and, on camera, removed J.J.H. over Plaintiff's repeated requests that she not. Plaintiff begged the Sheriff's Office to serve the restraining order before he could leave with J.J.H. When deputies served it on Vincent Hyler, J.J.H. was with him at Judith Hyler's house, where the shotgun was kept. The deputies took J.J.H. and gave him back to Plaintiff.

72. Vincent Hyler drank regularly at McCarty's Bar and at Vic's and came home severely intoxicated. He stopped going to work for whole weeks at a time to drink, including March 3 through 7, 2025, when he spent every night at the bars. Michael Hyler paid his bar tabs, as Judith Hyler and Loren Hyler confirmed to Plaintiff, funding the drinking during which the abuse occurred.

73. On Christmas Day 2024, when Plaintiff asked Michael Hyler for help with Vincent Hyler's drinking, he told her she needed to show Vincent Hyler more respect. Plaintiff understood his answer and Judith Hyler's the same way: that the fault was hers, for not submitting more willingly.

74. Every answer Plaintiff was given was the opposite of the truth. She treated Vincent Hyler with respect on principle, and Michael Hyler told her she needed to show him more respect. She was already submitting to what he demanded, and Judith Hyler told her she was not giving him enough attention. She was the one raising and protecting J.J.H., and she was called neglectful. These were not merely false. Each time, they were the reverse of what was true.

75. Judith Hyler and Michael Hyler knew all of this before J.J.H. was taken from Florida on August 19, 2026, and they have kept him in their home with Vincent Hyler since. Vincent Hyler's own August 12, 2026 application attached the Lee County domestic-violence injunction of July 6, 2026.

76. On July 6, 2026, Vincent Hyler's counsel represented to the Mendocino court that Michael Hyler would be present at all times as a safeguard for J.J.H.

A COERCIVE PATTERN

77. At the center of it was a morbid jealousy, present from the first weeks of the relationship, that never let up. Taken together, this was coercive control: a pattern of behavior that in purpose and effect unreasonably interfered with Plaintiff's free will and personal liberty. It included isolating her from friends, relatives, and other sources of support; depriving her of basic necessities, including food, sleep, money, transportation, and a telephone; controlling and monitoring her movements, communications, daily behavior, and finances; and compelling her, by threat and intimidation, to submit to what she had a right to refuse. (Fam. Code, § 6320, subd. (c).) Vincent Hyler's family answered her reports of it by blaming her, and helped it continue. It has not ended. As

described above, it has continued through the courts, where what he did to her has been turned into accusations against her: neglect, instability, concealment, kidnapping. Each is the reverse of the truth.

78. What is alleged here is not a complete account of what Plaintiff endured, and it is not close to one. The abuse was daily, throughout the relationship; a complete account would take a recording of every hour of her life. These are the instances she can set down; the recordings, her declarations, and her testimony will show more.

THE CONDUCT ALLEGED IS CRIMINAL

79. The conduct alleged above includes acts that California law makes crimes, among them: sexual acts, including sodomy, accomplished against her will by means of duress, menace, or fear, which the law judges by the total circumstances, including the victim's relationship to the defendant (Pen. Code, §§ 261, subds. (a)(2), (b)(1), 286, subd. (c)(2)(A)); criminal threats (Pen. Code, § 422, subd. (a)); drawing or exhibiting a deadly weapon in a threatening manner (Pen. Code, § 417, subd. (a)(1)); child endangerment (Pen. Code, § 273a); and driving under the influence (Veh. Code, § 23152). Plaintiff pleads them because they show the malice with which Vincent Hyler acted, and what Judith Hyler and Michael Hyler helped him do.

FIRST CAUSE OF ACTION — Domestic Violence (Civ. Code, § 1708.6) — Against Vincent Michael Hyler

80. Plaintiff incorporates each paragraph above.

81. Vincent Hyler inflicted injury on Plaintiff resulting from abuse, as defined in Penal Code section 13700, subdivision (a), and he had with Plaintiff a relationship described in Penal Code section 13700, subdivision (b). He is liable for the tort of domestic violence. (Civ. Code, § 1708.6, subd. (a).)

82. This action is brought within three years of his last act of domestic violence against Plaintiff. (Code Civ. Proc., § 340.15.)

83. Plaintiff seeks general and special damages, punitive damages under Civil Code section 3294, equitable relief, costs, and reasonable attorney's fees as the Court deems proper. (Civ. Code, § 1708.6, subds. (b), (c).)

SECOND CAUSE OF ACTION — Aiding and Abetting Domestic Violence — Against Judith Hyler, Michael Hyler, and Does 1–10

84. Plaintiff incorporates each paragraph above.

85. A person is liable for aiding and abetting an intentional tort if the person knows the other's conduct constitutes a breach of duty and gives substantial assistance or encouragement to the other to so act. (Fiol v. Doellstedt (1996) 50 Cal.App.4th 1318, 1325–1326; Saunders v. Superior Court (1994) 27 Cal.App.4th 832, 846.)

86. Judith Hyler knew Vincent Hyler was abusing Plaintiff and gave substantial assistance and encouragement: she answered Plaintiff's report of abuse by blaming Plaintiff; she told Plaintiff not to call the police; she kept handing J.J.H. to Vincent Hyler, knowing he drove drunk with him; and she took J.J.H. from Plaintiff over Plaintiff's objection.

87. Michael Hyler knew Vincent Hyler was abusing Plaintiff and gave substantial assistance and encouragement: he paid for the drinking during which the abuse occurred; on information and belief, he told Vincent Hyler to deny the child and accuse her of infidelity; and when Plaintiff asked him for help, he told her to show Vincent Hyler more respect.

88. Defendants acted with malice and oppression. Plaintiff is entitled to punitive damages under Civil Code section 3294.

J.J.H.'S OWN CLAIM IS RESERVED

89. Nothing in this complaint states or releases any claim belonging to J.J.H., including his claim for injuries inflicted on him before his birth through the wrongs done to his mother while she was pregnant. (Civ. Code, § 43.1; Turpin v. Sortini (1982)

31 Cal.3d 220, 230–231.) That claim will be brought on his behalf, through counsel.

PRAYER

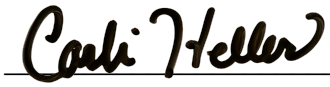
Plaintiff asks for judgment against each Defendant for: (1) general damages according to proof; (2) special damages according to proof, including the costs of her medical care and of J.J.H.'s therapeutic care she has paid; (3) punitive damages; (4) equitable relief as the Court deems proper; (5) costs and reasonable attorney's fees; and (6) any other relief the Court finds just.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on every cause of action.

VERIFICATION

I, Carli Michelle Heller, am the Plaintiff. I have read this Complaint. The facts stated in it are true of my own knowledge, except those stated on information and belief, and as to those I believe them to be true. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Bonita Springs, Florida, on November 6, 2026.



Carli Michelle Heller, Plaintiff