



Chapter 1: Unveiling the Shadows

In the glitzy world of entertainment, where fame and fortune often overshadow the truth, a storm is brewing around one of the industry's most iconic figures—Sean "P. Diddy" Combs. Known for his musical genius and business acumen, P. Diddy now finds himself at the center of a scandal that threatens to unravel the very fabric of his empire.

This explosive exposé delves into the recent allegations and federal investigations that have cast a long shadow over P. Diddy's illustrious career. In this chapter, we pull back the curtain on the accusations, presenting a comprehensive look at the scandal through meticulously gathered documents and testimonies.

Inside, you will find:

- **Copies of the Indictments:** The official documents that lay the groundwork for the charges against P. Diddy.
- **Witness Statements:** Firsthand accounts from those who were there, offering a glimpse into the events that have captivated the media.
- **A List of Alleged Party Goers:** A who's who of the entertainment elite, whose presence at key events has raised eyebrows and fueled speculation.
- **An Exclusive AI Look at the Evidence:** Leveraging cutting-edge technology, we provide an in-depth analysis of the evidence, revealing hidden patterns and connections that may hold the key to understanding the full scope of the scandal.

Prepare to embark on a journey into the heart of a controversy that challenges the boundaries between public persona and private reality. As the layers are peeled back, the truth emerges—unfiltered and unvarnished.

UNITED STATES FEDERAL COURT
SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,
JUSTIN DIOR COMBS,
ETHIOPIA HABTEMARIAM,
LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM,
CHALICE RECORDING STUDIOS,
LOVE RECORDS,
MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP,
COMBS GLOBAL ENTERPRISES,
JOHN and JANE DOES 1-10 and
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

Civil Action

Jury Demand

TRIGGER WARNING:

THIS DOCUMENT CONTAINS HIGHLY GRAPHIC INFORMATION OF A SEXUAL NATURE, INCLUDING SEXUAL ASSAULT. ADDITIONALLY, THERE ARE GRAPHIC IMAGES OF THE AFTERMATH OF A SHOOTING, REDACTED IMAGES OF SEXUAL INTERCOURSE, REDACTED IMAGES OF MINORS, SEX WORKERS, AND PROSTITUTES, DETAILS OF SEX TRAFFICKING, AND THE ILLEGAL DISTRIBUTION OF GUNS, AND DRUGS

Plaintiff Rodney “Lil Rod” Jones (“Mr. Jones”) hereby alleges, as and for his Complaint against Defendant Sean Combs (“Mr. Combs”), Defendant Justin Dior Combs (“J. Combs”), Defendant Lucian Charles Grainge (“Mr. Grainge”), Defendant Ethiopia Habtemariam (“Ms. Habtemariam”), Defendant Kristina Khorram (“Ms. Khorram”), Defendant Chalice Recording Studios (“CRS”), Defendant Love Records (“LR”), Defendant Motown Records (“MR”), Defendant Universal Music Group (“UMG”), Defendant Combs Global Enterprises (“CGE”), John and Jane Does 1-10, ABC Corporations 1-10, as follows:

JURISDICTION AND VENUE

1. This Court has personal jurisdiction over the Defendants under and consistent with the Constitutional requirements of Due Process in that the Defendants, acting directly or through his agents or apparent agents, committed one or more of the following:
 - a. The transaction of any business within the state;
 - b. The making of any contract within the state;
 - c. The commission of a tortious act within this district and
 - d. The ownership, use, or possession of any real estate in this state.
2. From September 2022 to the date of this filing, Defendants have consistently and purposefully availed themselves of the privilege of conducting activities within New York, thus invoking the benefits and protections of New York law. In return for these benefits and protections, Defendants must submit to the burdens of litigation in New York.
3. This litigation arises from or relates to the tortious activities defendants visited upon defendants in the states of New York, California, Florida, and the United States Virgin Island. This tortious conduct violated United States Federal Rico Laws.
4. Requiring Defendants to litigate these claims in this District does not offend traditional notions of fair play and substantial justice. Plaintiffs' claims arise from some conduct occurring by Defendants in New York.

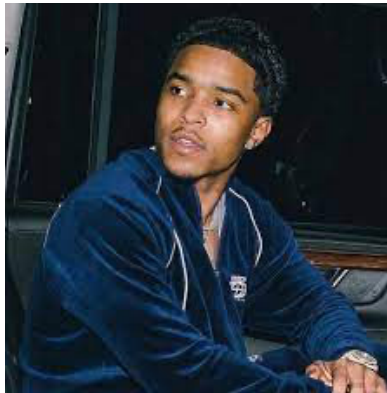
PARTIES

5. Plaintiff Rodney Jones is an American artist and music producer. Mr. Jones resides in the states of New York, and California.
6. Defendant Sean Combs is a rapper and record executive popularly known by his stage names Puff Daddy, Puffy, P. Diddy, Diddy, Brother Love or Love. Mr. Combs came to fame in the early 1990s with his record label Bad Boy Records. He rose to prominence in the music and entertainment industry over the decades and is regularly referred to as a hip-hop mogul. Mr. Combs resides at 200 South Mapleton Dr., Beverly Hills, California 90024.



Defendant Sean Combs

7. Defendant Justin Dior Combs is the son of Mr. Combs and Misa Hylton. J. Combs was born on December 30, 1993. J. Combs is a producer and actor. He has appeared on TV series like Catfish: The TV Show, Wild' N Out and Hip-Hop Squares. Defendant Justin Dior Combs resides at 1550 N El Centro Ave, Los Angeles, CA 90028.



Defendant Justin Dior Combs

8. Defendant Lucian Charles Grainge is the CEO of Defendant Universal Music Group. Defendant Lucian Charles Grainge resides at 53551 Ross Ave Unit 34A, La Quinta, CA 92253; and 668 Chautauqua Blvd, Pacific Palisades, CA 90272.



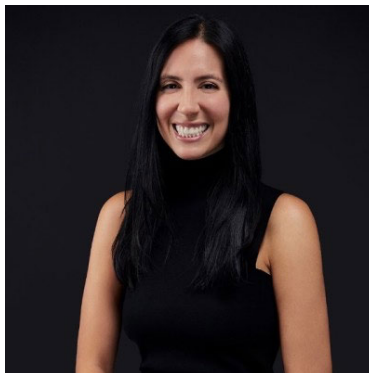
Lucian Charles Grainge

9. Defendant Ethiopia Habtemariam is the Former CEO of Defendant Motown Records the parent company of Defendant Love Records. Defendant Habtemariam resides at 13701 Riverside Dr Apt 8Flr, Sherman Oaks, CA 91423-2430.



Ethiopia Habtemariam

10. Defendant Kristina Khorram is the Chief of Staff to Sean “Diddy” Combs, Combs Global Enterprises. She resides at 10445 Wilshire Blvd Apt 501, Los Angeles, CA 90024.



Kristina Khorram, Chief of Staff to Sean "Diddy" Combs

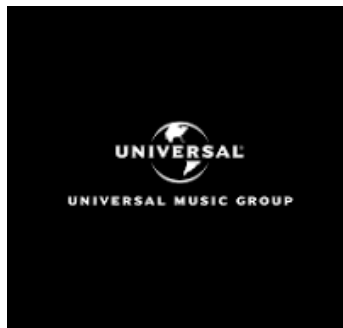
11. Defendant Chalice Recording Studios is a popular recording studio located at 845 Highland Ave, Los Angeles, CA 90038, United States.



12. Defendant Motown Records is a record label with a principal place of business located at 1750 Vine St, Los Angeles, CA. Ethiopia Habtemariam was the chairman and CEO of Universal Music Group's Motown Records.



13. Defendant Universal Music Group is a record label with a principal place of business located at 2220 Colorado Avenue in Santa Monica, California. Lucian Grainge is the Chairman & CEO, Universal Music Group.



14. Defendant Love Records is a record label with a principal place of business located at 6255 Sunset Boulevard Suite 713. Los Angeles, CA, United States 90028. Defendant Love Records was founded by Mr. Combs and Defendant Motown Records.



15. Defendant Combs Enterprises is a diverse portfolio of businesses and investments that includes music, fashion, fragrance, beverage, marketing, film, television, and media properties. They have a principal place of business located in New York, New York.



Combs Global

RODNEY LIL ROD JONES

16. Rodney “Lil Rod” Jones Jr. is from the Windy City [Chi-town]. He was born and raised in Chicago, Illinois. Mr. Jones is the second oldest son and fourth child out of nine siblings. Mr. Jones comes from a long line of Gospel Music influencers.
17. Mr. Jones started playing instruments at the age of five. He began playing drums in church, and at the age of thirteen he picked up playing the guitar. From thirteen to present day, Mr. Jones has taught himself to play over thirteen instruments.



Mr. Jones, the Child Prodigy

18. Mr. Jones is considered a musical prodigy. His talents have led him to produce and create a commercial marketplace for music that has been recorded by some of the most prestigious and highly acclaimed artists in music history.
19. Throughout the duration of his career, Mr. Jones has worked the south side of Chicago Music scene, playing with the following legendary greats: Georgia Mass Choir, Donald Lawrence, The Clark Sisters and The Smokie Norful.
20. On or about, August 2022 Mr. Jones received a call from Mr. Combs requesting that he produce several songs on a rhythm and blues album titled, “The Love Album: Off the Grid,” (“Love Album”).
21. Mr. Jones agreed, and his life has been detrimentally impacted ever since.

SUMMARY OF EVENTS

22. From September 2022 to November 2023, Mr. Jones produced nine songs on Mr. Combs' Love album.
23. Mr. Jones lived with Mr. Combs for months at a time, spending holidays, birthdays, and missing major family events.
24. Mr. Jones resided at Mr. Combs residence located in Los Angeles, California, New York City, and Miami, Florida. Mr. Jones also spent several weeks on a yacht rented by Mr. Combs in the US Virgin Islands.
25. Throughout his time with Mr. Combs, Mr. Jones witnessed, experienced, and endured many things that went far beyond his role as a Producer on the Love album.
26. The claims raised in this complaint have been corroborated through witness statements, video/audio recordings, and images that Mr. Jones has in his possession.
27. Mr. Combs required Mr. Jones to record him constantly. On several occasions, Mr. Combs took Mr. Jones cellphone and began recording himself. As a result, Mr. Jones has secured **HUNDREDS** of hours of footage and audio recordings of Mr. Combs, his staff, and his guests engaging in serious illegal activity.
28. Mr. Jones has secured irrefutable evidence of:
 - a. The acquisition, use, and distribution of ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms,
 - b. The displaying and distribution of unregistered illegal firearms,

- c. Mr. Combs providing laced alcoholic beverages to minors and sex workers at his homes in California, New York, the U. S. Virgin Islands¹, and Florida,
- d. Mr. Combs Chief of Staff, Kristina Khorram (“KK”) instructing her staff to retrieve drugs so she can provide it to Mr. Combs for his consumption,
- e. Christian Combs drugging and sexually assaulting a woman²,
- f. Mr. Combs detailing how he planned to leverage his relationship with Bishop T.D. Jakes to soften the impact on his public image of Cassie Ventura’s lawsuit,
- g. Yung Miami’s cousin, and or assistant sexually assaulting Mr. Jones,
- h. Actor Cuba Gooding Jr. sexually harassing and assaulting Mr. Jones,
- i. Rapper³ (REDACTED) on Mr. Combs yacht consorting with underaged girls, sex workers, and
- j. R&B Singer⁴ (REDACTED) in Mr. Combs Los Angeles home consorting with underaged girls and sex workers.

CHALICE RECORDING STUDIOS SHOOTING

- 29. On or about September 12, 2022, Mr. Combs held a writers and producers camp at Chalice Recording Studio at 845 Highland Ave, Los Angeles, CA 90038.
- 30. Present at this camp were Mr. Combs, his son Justin Combs, and Justin's friend named G.
- 31. Mr. G is a 30-year-old tall African American male.
- 32. In addition to these individuals, other musicians were present at the camp. This writer has spoken to several musicians who attended the camp.
- 33. One evening during this camp, Mr. Combs, J. Combs, and G were in a heated conversation.
- 34. That conversation was moved out of the studio and into a restroom adjacent to where Mr. Jones was sitting.
- 35. Mr. Jones was approximately 2 feet away from the bathroom when gunshots rang out. Mr. Jones recalls hearing multiple gunshots.

¹ This writer spoke with several employees of the yacht rented by Mr. Combs in the U.S. Virgin Islands who personally witnessed Defendant Khorram instruct her staff, Brendan Paul, Frankie Santella, and Moy Baun spike bottles of champagne with ecstasy.

² A complaint is forthcoming.

³ He is a Philadelphia Rapper who dated Nicki Minaj.

⁴ He is a Grammy Award winning R&B singer who had trouble with law enforcement after assaulting a Bajan Billionaire.

36. Mr. Jones immediately went into a state of shock and feared that he would be shot next. Mr. Jones genuinely believed that he would be shot through the door due to how close he was.
37. After the shooting ended, a crowd gathered around the restroom.
38. When the door finally opened, Mr. Combs and J. Combs exited.
39. G was lying on the restroom floor in a fetal position, holding his stomach and bleeding out of his leg/hip area.
40. Everyone stood around looking upon G. Frustrated by the lack of aid to G, Mr. Jones dropped everything, ran to G, and immediately began placing pressure on G's gunshot wound to his stomach.
41. As he was applying pressure on his stomach, Mr. Jones realized that G was gushing blood from another area near his leg/hip.
42. He decided to lift G and placed him to sit on the toilet. Mr. Jones asked the crowd to call the ambulance.
43. Mr. Jones lifted G and brought him to the ambulance at the studio's front. At this time, Mr. Combs and Justin disappeared to another part of the studio.
44. Mr. Combs gave strict instructions to inform the police that he had nothing to do with the shooting. He also forced Mr. Jones to lie to the police by telling them that G was shot standing outside the studio by a drive-by assailant.

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Man shot outside party at Hollywood recording studio

By KCAL-News Staff
Updated on: September 12, 2022 / 7:09 AM PDT / KCAL News

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At least one person was shot at a party at a Hollywood recording studio, police said Monday.

Officers were called to the 800 block of North Highland Avenue, at Willoughby, to check into reports of a shooting at about 3 a.m., according to the LAPD. At the location, they found man had been shot after stepping outside the studio.

The man, in his 30s, was taken to a hospital in stable condition. He was reportedly shot in the abdomen.

Sky 2 was over the scene early Monday spotted several people sitting outside the location being questioned by police.

No information was released about the suspect, and it's not known if the shooting was gang related.

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Man shot to death after fight in Long Beach



Man hospitalized after home invasion robbery in Pacoima



Investigation ongoing after man found shot to death in Pico Rivera



17 firearms recovered inside warehouse in L.A.



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KCAL-News Staff

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MYTHERESA
THE FINEST EDIT IN LUXURY

COMME DES GARÇONS...
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45. Mr. Jones has several corroborating witnesses who spoke with this writer anonymously due to fear of retaliation from Mr. Combs. They have agreed to speak publicly when subpoenaed.

46. Mr. Jones has the clothing he wore that day and believes it may still have the stains and DNA of G's blood.
47. The following are screenshots of the aftermath of the restroom where G was shot by either Mr. Combs or J. Combs:



Aftermath of the Shooting of G

48. Clearly, G was **NOT** shot outside of the studio as Mr. Combs instructed his team to report to law enforcement.
49. Mr. Combs and Defendant's LR, MR, UMG, and CRS provided private security for the writers camp at Defendant CRS.
50. The Security was porous and lackluster at best.
51. The fact that either Mr. Combs and J. Combs were allowed to enter CRS with guns, and those guns were not confiscated by security is a clear breach of duty by Mr. Combs, Defendant's LR, MR, and UMG to protect Mr. Jones and the other attendees of this writers camp.
52. As a result of this shooting, Mr. Jones is severely traumatized. Mr. Jones now suffers from PTSD, severe anxiety, depression, and insomnia.

MR. JONES WAS SEXUALLY HARASSED, AND ASSAULTED BY MR. COMBS

53. Throughout his time living with Mr. Combs, Mr. Jones was the victim of constant unsolicited and unauthorized groping and touching of his anus by Mr. Combs.
54. These events took place in LA, NY, FL, and the United States Virgin Islands.
55. In addition to the unsolicited and unauthorized touching, Mr. Jones was forced by Mr. Combs to work in Mr. Combs' bathroom as Mr. Combs walked around naked and showered in a clear glass enclosure.
56. As a heterosexual Christian man, Mr. Jones was uncomfortable with Mr. Combs' advances and expressed his discomfort to Mr. Combs Chief of Staff, Kristina Khorram ("KK").
57. KK responded to Mr. Jones complaint with, "you know, Sean will be Sean."
58. KK also attempted to downplay Mr. Combs groping of Mr. Jones anus and genitals, as friendly horseplay, stating that those acts were Mr. Combs way of "showing that he likes you [Mr. Jones]".
59. Despite these assurances, on several occasions when Mr. Combs began to undress and walk around his house naked, KK would say, "okay, I am leaving now," and she would disappear.
60. KK's hypocrisy is breathtaking at best or enabling at worst.
61. Mr. Jones believes that KK aided and abetted Mr. Combs' sexual assault of him and was working with Mr. Combs to groom him into accepting a homosexual relationship.
62. Through these sexually deviant acts, one would say Mr. Combs has a pattern and practice of engaging in such nefarious activity. This ongoing conduct shows that Mr. Combs cannot be rehabilitated.

MR. COMBS ATTEMPTED TO GROOM MR. JONES INTO ENGAGING IN GAY SEX

63. Mr. Combs was aware that Mr. Jones looked up to, and idolized music Producer Steven Aaron Jordan ("Stevie J").
64. Stevie J is an American DJ, record producer, and television personality.
65. Stevie J was part of the Bad Boy Records production team the Hitmen.
66. In 1997, Stevie J won a Grammy Award for his work on Puff Daddy's debut album.
67. Throughout the late 1990s, Stevie J produced for several artists including Mariah Carey, Tevin Campbell, The Notorious B.I.G., 112, Jodeci, Faith Evans, Jay-Z, and Eve.
68. Stevie J was one of the producers on the Love Album.

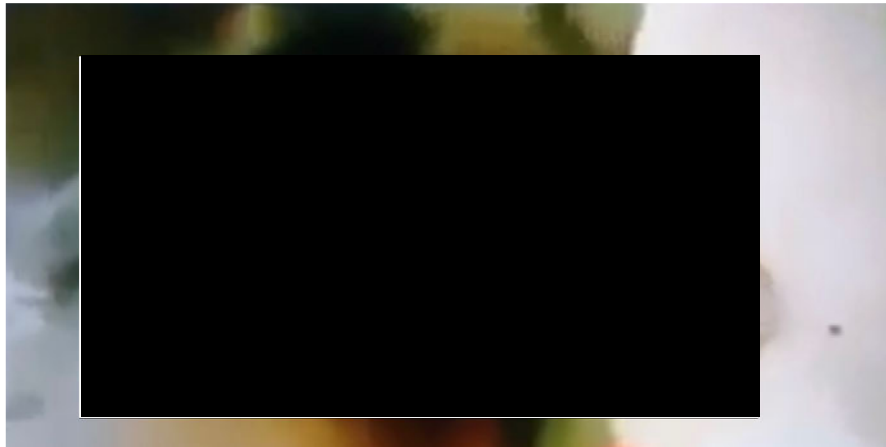
69. Mr. Combs used access to Stevie J, and his knowledge of Mr. Jones admiration of Stevie J to groom and entice Mr. Jones to engage in homosexuality.
70. Mr. Combs went so far as to share a video of Stevie J anally penetrating a Caucasian male without a condom. This was done to ease Mr. Jones' anxiety concerning homosexuality. According to Mr. Combs, "this is a normal practice in the music industry, look even Stevie J is doing it."
71. Mr. Combs informed Mr. Jones that he had engaged in sexual intercourse with rapper⁵ (REDACTED), R&B singer⁶ (REDACTED), and Stevie J.
72. Mr. Combs promised to make sure that Mr. Jones wins producer of the year at the Grammys if he engaged in homosexuality.
73. The following are screenshots of the video⁷ of Stevie J anally penetrating a Caucasian male, that Mr. Combs provided to Mr. Jones:



⁵ He is a Philadelphia Rapper who dated Nicki Minaj.

⁶ He performed at the Superbowl and had a successful Vegas residency.

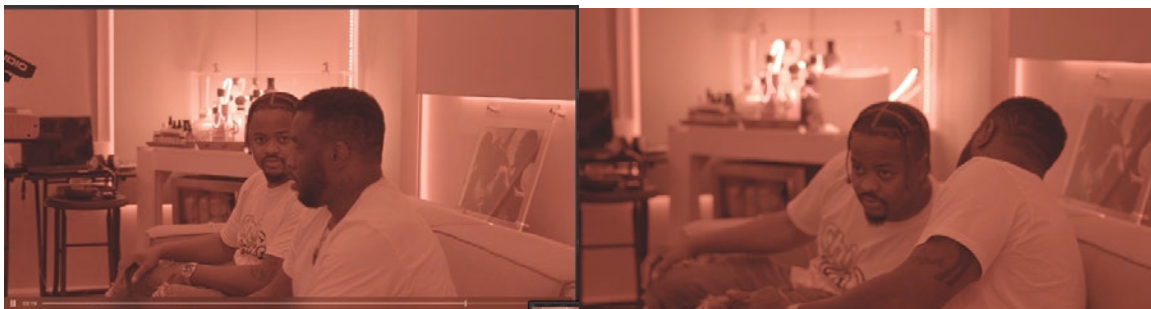
⁷ This writer is in possession of the video and will provide a copy to the court.



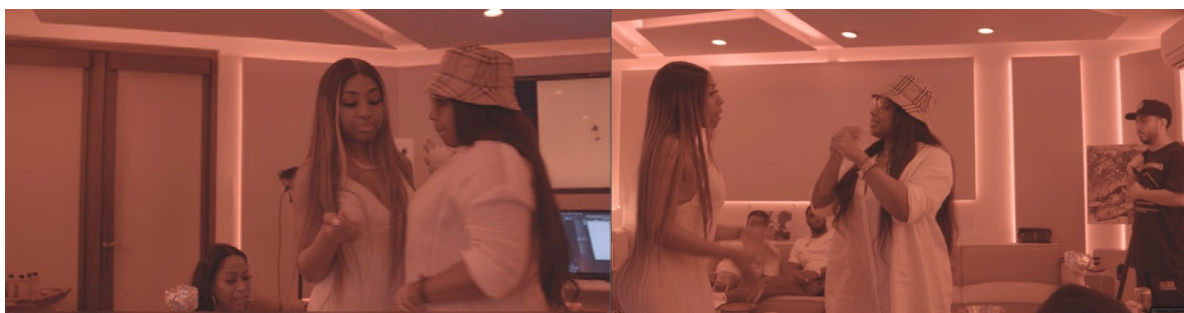
**THANKSGIVING 2022, MR. JONES IS SEXUALLY ASSAULTED BY
YUNG MIAMI'S COUSIN**

74. On Thanksgiving Day 2022, Mr. Jones was in Mr. Combs house located in Miami, Florida. Yung Miami and her female cousins were also present.
75. Mr. Combs was intoxicated and offered cocaine to Mr. Jones. Mr. Jones rejected him and proceeded to walk to the restroom.
76. While using the restroom Yung Miami's cousin burst into the bathroom and began groping Mr. Jones. Mr. Jones believes that Mr. Combs sent her in there to sexually assault Mr. Jones.
77. As she entered the bathroom she dropped to her knees and began performing oral sex on Mr. Jones exposed penis. Mr. Jones pushed her away and exited the bathroom.
78. Yung Miami's cousin did not accept Mr. Jones rejection, as she proceeded to follow Mr. Jones out of the bathroom.
79. She started undressing and attempted to straddle him and have sex with him in the presence of Mr. Combs and his staff.

80. Once again Mr. Jones pushed her off. The following are images from a video⁸ of Yung Miami, her cousin, Mr. Jones, and Mr. Combs:



Mr. Jones and Mr. Combs on Thanksgiving Day right before Mr. Combs invites Mr. Jones into the restroom and attempted to force him to take cocaine.

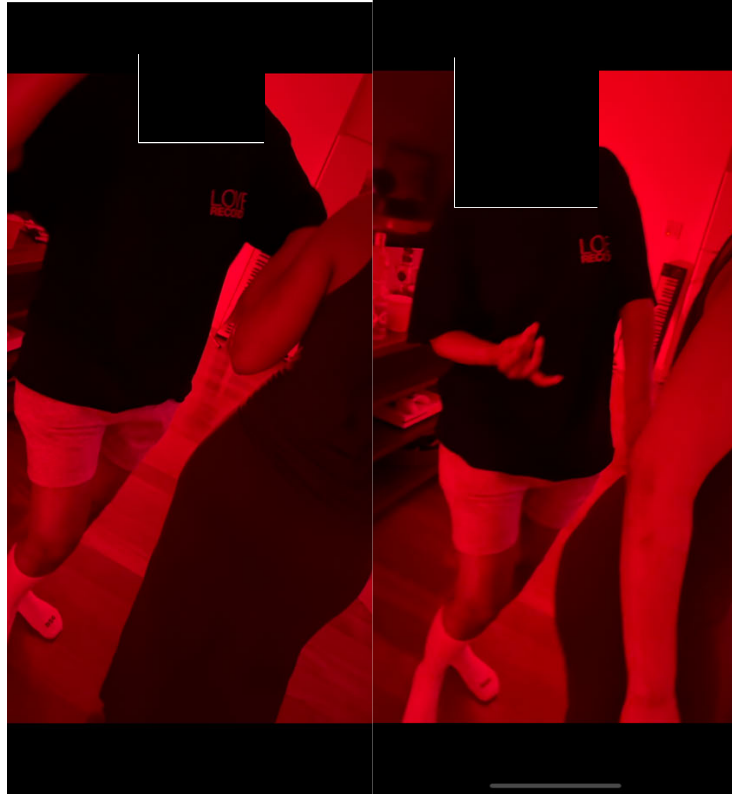


Yung Miami, and her female cousin who sexually assaulted Mr. Jones on Thanksgiving Day 2022

TRAFFICKING AND VICTIMS' PROTECTION ACT

81. Throughout his time with Mr. Combs, Mr. Jones was transported from California to New York, Florida, and the United States Virgin Islands.
82. During this time, Mr. Jones was forced to solicit sex workers and perform sex acts to the pleasure of Mr. Combs.
83. On or about February 4, 2023, Mr. Combs forced Mr. Jones to bring prostitutes and sex workers back to his home in Miami, Florida.

⁸ This writer is in possession of the video and will provide a copy to the court.



The Sex Workers That Mr. Combs Forced Mr. Jones To Bring Back To His Home

84. On or about, February 2, 2023, incident, Mr. Jones believes Mr. Combs drugged him. Mr. Jones recalls waking up naked, dizzy, and confused. He was in bed with two sex workers and Mr. Combs. He also recalls aimlessly wandering around the house with no clothes on.



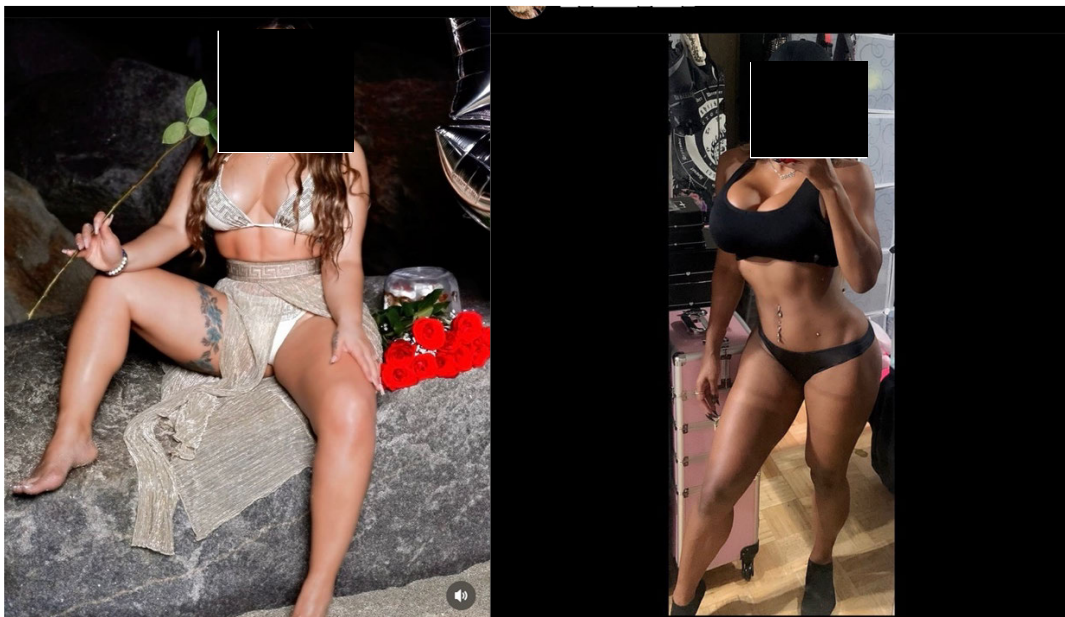
Sex Workers In Mr. Jones Bed The Morning After Being Drugged

85. On another occasion in Miami, Florida, on Thanksgiving night of 2022, Mr. Combs asked Mr. Jones and DeForrest Taylor to enter the studio bathroom.
86. He asked them for a hundred-dollar bill because he wanted them to do cocaine with him.
87. Mr. Jones was scared, but luckily, he didn't have a hundred-dollar bill, so Mr. Combs waited a little later to do coke with Yung Miami.
88. Later that evening, he required Mr. Jones to solicit sex workers from Booby Trap on the River located at 3615 NW S River Dr, Miami, FL 33142. Mr. Jones did so, and Mr. Combs forced him to engage in unsolicited sex acts with these workers.



Booby Trap on the River

89. As part of Mr. Jones sex worker recruitment tools, Mr. Combs provided Mr. Jones with an exclusive Bad Boy baseball cap and required him to wear it to Booby Trap on the River as a signal to any sex worker he approached that Mr. Combs was in town and had sent Mr. Jones to recruit them.
90. Mr. Jones had no desire to visit Booby Trap on the River. Mr. Jones had no desire to solicit sex workers from Booby Trap on the River. Mr. Combs used his power and influence, to intimidate and force Mr. Jones into soliciting sex workers from Booby Trap on the River. As detailed below, Mr. Combs used many tactics to maintain dominion and control of Mr. Jones.
91. Apparently, these workers were accustomed to servicing Mr. Combs, and would know that he is in town by the sight of the Bad Boys baseball cap.
92. The following are Instagram Profiles of two of the sex workers that Mr. Combs required Mr. Jones to solicit and have sex with at his home in Miami, Florida:

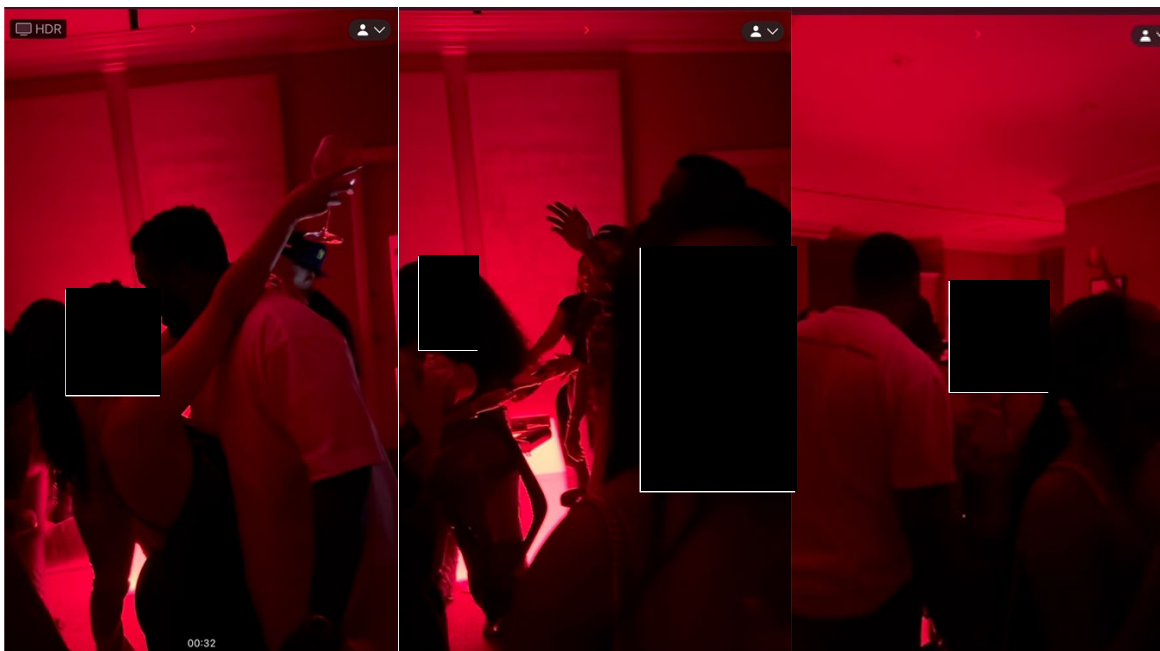


MR. COMBS AND J. COMBS SOLICITS, DRUGS AND ENGAGES IN ILLICIT SEX ACTS WITH MINORS AND SEX WORKERS

98. On or about July 2, 2023, in California, Mr. Combs had a "listening party" at his home.
99. Present at this party was a R&B artist⁹ (REDACTED), J. Combs, sex workers, and some underaged girls.
100. The event began at 7 pm. Mr. Combs requested female sex workers and required Mr. Jones to solicit them. An hour later, several sex workers appeared.
101. In addition to sex workers, there were at least five women in the crowd that were under the age of sixteen.
102. Mr. Combs forced all the women to drink laced DeLeon liquor. Upon information and belief, Mr. Combs laced the liquor with ecstasy.
103. Mr. Combs did not check the identification of any of these underage girls.
104. The presence of these underage women made Mr. Jones very uncomfortable.
105. He attempted to leave, and Mr. Combs forced him to stay.
106. Mr. Combs went so far as to take Mr. Jones' car keys to prevent him from leaving.
107. After being forced to drink laced DeLeon shots Mr. Jones began feeling lightheaded and recalls passing out and waking up at 4 am the following morning naked with a sex worker sleeping next to him.
108. Screenshots of a video¹⁰ from that night is imbedded below:

⁹ He is a Grammy Award winning R&B singer who had trouble with law enforcement after assaulting a Bajan Billionaire.

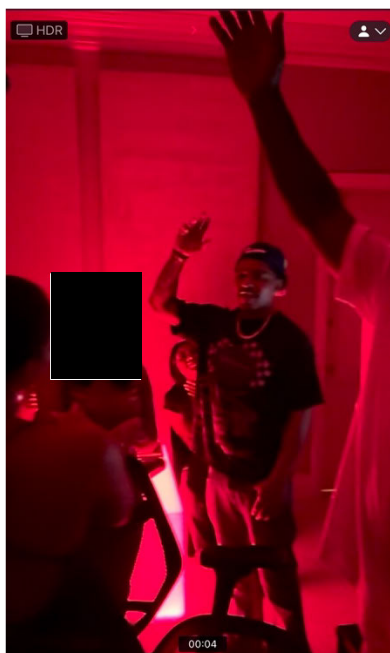
¹⁰ This writer is in possession of the video and will provide a copy to the court.



Mr. Combs With an Underage Female

Underage Female

Sex Worker



Justin Combs With an Underage Female

MR. COMBS ATTEMPTS TO PASS OFF MR. JONES TO CUBA GOODING JR.

109. Mr. Jones believes that Mr. Combs was grooming him to pass him off to his friends.

110. This fear became reality when Mr. Combs introduced Mr. Jones to Cuba Gooding Jr. while they were on Mr. Combs' yacht.

111. During the introduction, Mr. Combs suggested that Cuba “get to know” Mr. Jones better. He then left them alone in a makeshift studio on the yacht.



Mr. Combs and Cuba Gooding Jr. Moments Before Mr. Jones is Assaulted

112. As evidenced by a video, of which screenshots are imbedded below, Cuba Gooding Jr. began touching, groping, and fondling Mr. Jones’ legs, his upper inner thighs near his groin, the small of his back near his buttocks and his shoulders.

113. Mr. Jones was extremely uncomfortable, and proceeded to lean away from Mr. Gooding Jr.

114. He rejected his advances and Mr. Gooding Jr. did not stop until Mr. Jones forcibly pushed him away. The following is a screenshot¹¹ of the encounter with Cuba Gooding Jr.:

¹¹ This writer is in possession of the video and will provide a copy to the court.



Cuba Gooding Jr¹². Forcibly Touching Mr. Jones on Mr. Combs yacht

THE LOVE ALBUM

115. Throughout his time with Mr. Combs, Mr. Jones was under an implied work-for-hire agreement.

116. He was not compensated for his time living with Mr. Combs or for the songs he produced.

117. As evidence, he was listed as a producer for the following songs on the Love Albums final release: *Deliver Me*, *Stay PT 1*, *Reaching*, *What's Love*, *Stay Awhile*, *Moments*, *Need Somebody*, *Homecoming*, and *Tough Love*.

118. Mr. Combs and Defendants LR, MR, UMG all benefited from Mr. Jones' work product.

119. They failed to compensate Mr. Jones for his work.

120. As a result, Mr. Combs, and Defendants LR, MR, UMG were all unjustly enriched at the expense of Mr. Jones.

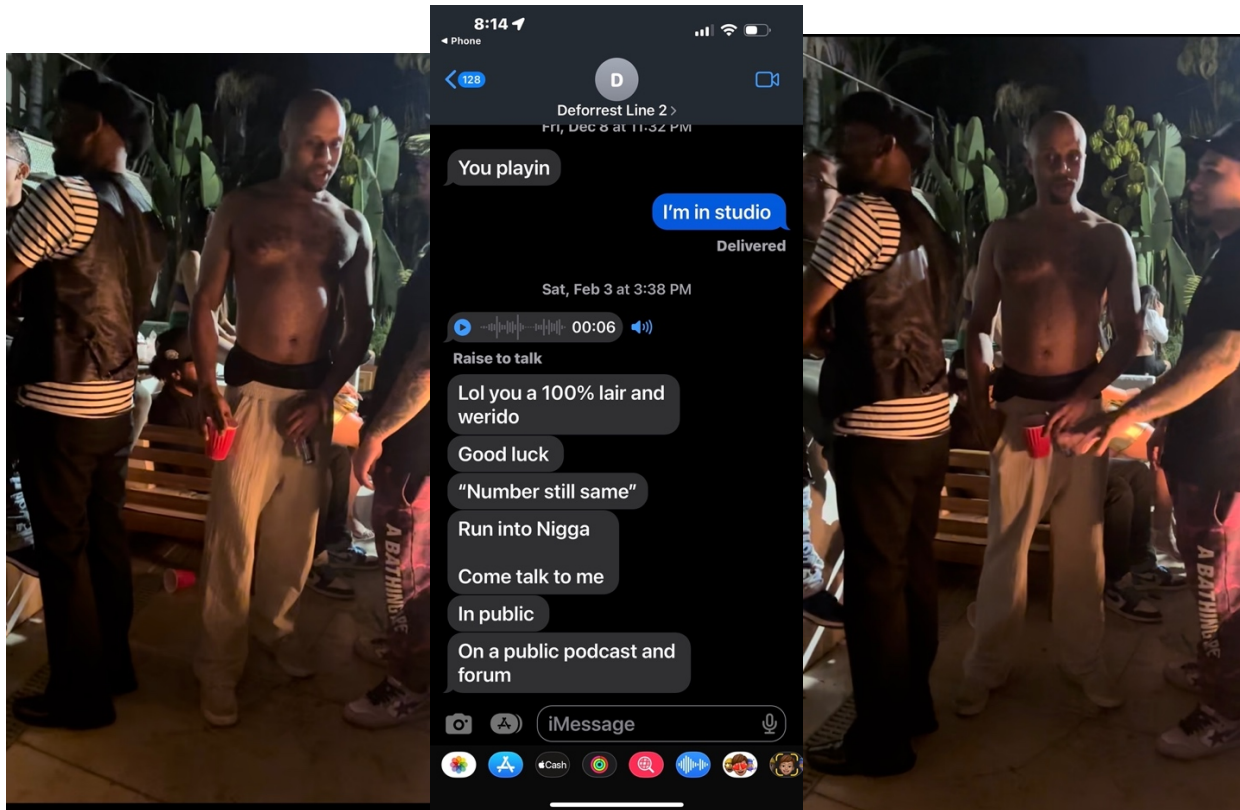
121. Mr. Jones attempted to work with Mr. Combs to secure his publishing and royalty rights for the work he completed on the Love album. Mr. Combs only offered Mr. Jones \$29,000.00 for 13 months, thousands of hours of work, and 9 songs that made it to the Love album. Ironically, Mr. Jones was willing to take \$50,000.00, his publishing and royalties. Mr. Combs self-serving greed would not allow him to pay¹³ Mr. Jones an additional \$21,000.

¹² Mr. Gooding Jr. has a storied history of sexually assaulting and forcibly touching individuals against their will. <https://www.usatoday.com/story/entertainment/celebrities/2023/11/22/cuba-gooding-jr-lawsuits-sexual-assault-battery/71682417007/>

¹³ This writer has retained other creatives, artists, and writers who have experienced this same treatment from Mr. Combs and will file suit in the coming weeks.

122. Mr. Combs deceptive business practices became so bad that Mr. Jones was left with no choice other than to make a public plea on social media for Mr. Combs to pay him for his work.

123. After publicly requesting that Mr. Combs do the right thing, and pay him fairly, Mr. Jones received an onslaught of threatening messages from Stevie J and Love Records A&R DeForrest Taylor¹⁴.



DeForrest Taylor Threatening Mr. Jones

MR. COMBS USED HIS POWER, AND INFLUENCE TO THREATEN AND INTIMIDATE MR. JONES

124. According to Mr. Jones, Mr. Combs is very forceful and demanding.

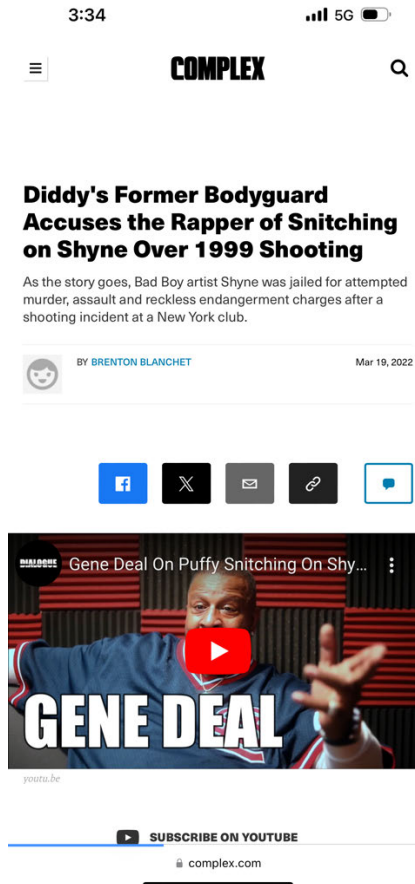
125. Mr. Combs does not take no for an answer and would often threaten to inflict bodily harm on Mr. Jones if Mr. Jones did not comply with his demands.

126. As detailed above, Mr. Combs threatened to eat Mr. Jones' face.

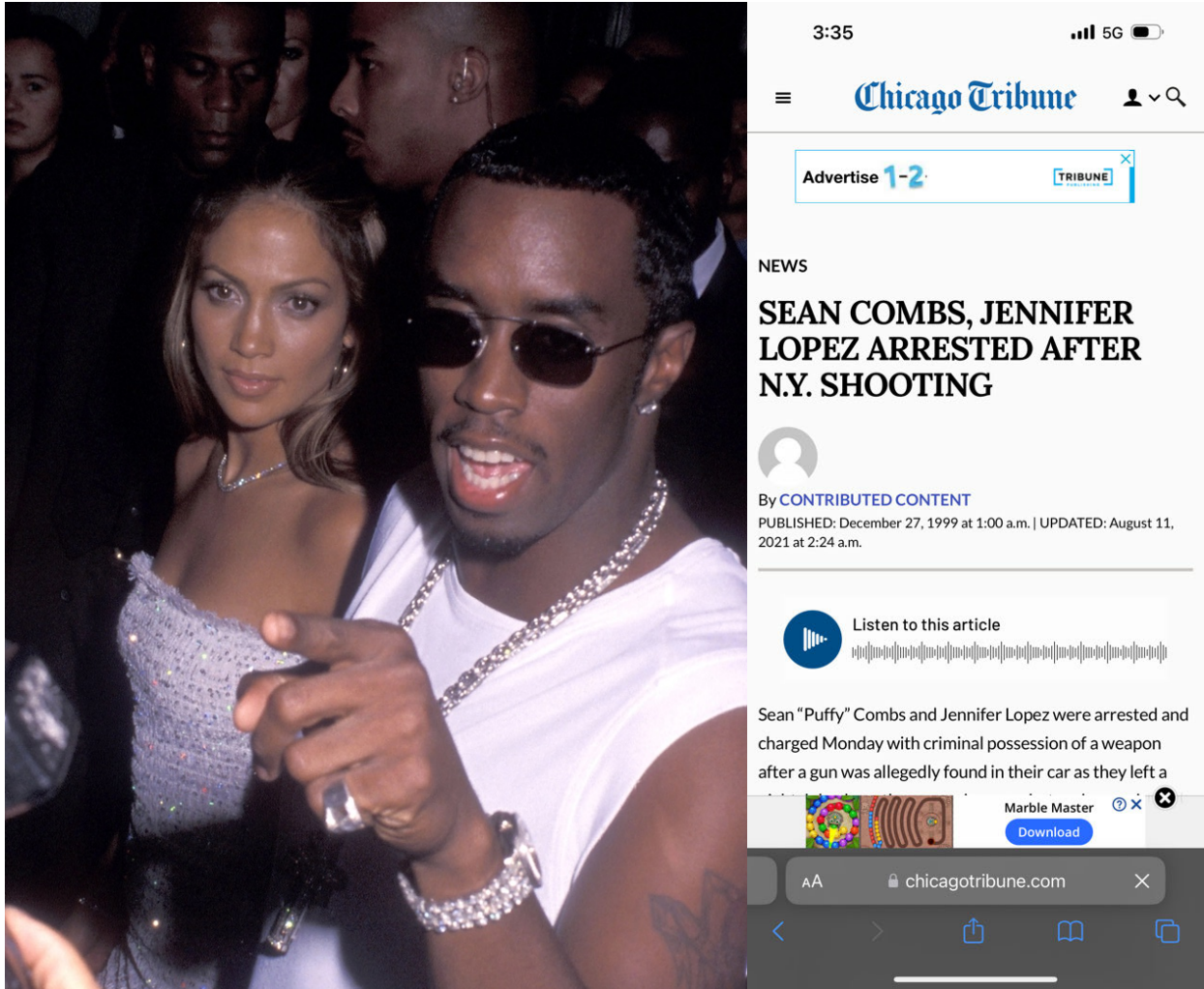
¹⁴ As the A&R of Love Records, DeForrest Taylor did not require Mr. Jones or any of the other creatives, musicians, or artists to sign an NDA.

127. On another occasion, while standing in Mr. Combs' bedroom, Mr. Jones was forced to watch as Mr. Combs displayed his guns and bragged about getting away with shooting people.

128. Mr. Combs shared that he was responsible for the shooting in the nightclub in New York City with rapper Shyne.



129. He shared that artist, and Mr. Combs' girlfriend at the time, Jennifer Lopez, aka, J-Lo carried the gun into the club for him and passed him the gun after he got into an altercation with another individual.



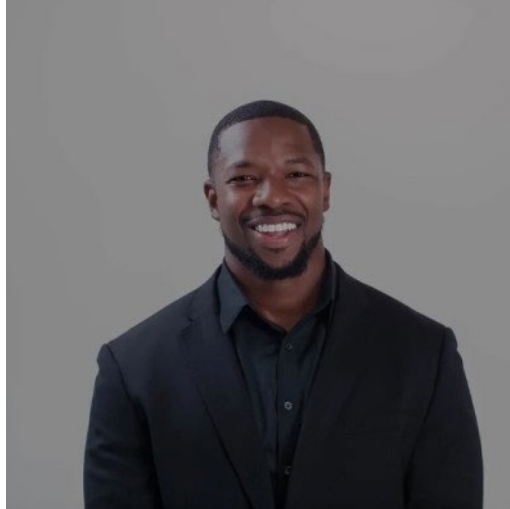
130. The shooting in Chalice Recording Studios confirmed Mr. Combs' statements.

131. These statements reinforced Mr. Jones's fear of Mr. Combs and strengthened Mr. Combs' dominion and control of Mr. Jones.

132. Mr. Jones was terrified of Mr. Combs. He felt like he could not tell him no.

133. Mr. Combs consistently made it clear that he has immense power in the music industry and with law enforcement.

134. Mr. Combs made it clear that his head of security, Faheem Muhammad ("Mr. Muhammad") had the power to make people and problems disappear.



Faheem Muhammad

135. Mr. Combs instructs his staff to always contact Mr. Muhammad if they are ever pulled over by the police in Miami or California.

136. Upon information and belief, Mr. Muhammad spoke with the LAPD after G was shot at CRS. The LAPD was in CRS and witnessed the blood in the restroom, and they went with the bogus claim that the shooting of G occurred outside of the studio. This was all thanks to Mr. Muhammad's connections within law enforcement.

137. Mr. Jones had no reason to disbelieve Mr. Combs as he had seen firsthand through the shooting of G and the subsequent silence of the LAPD and the media that Mr. Combs indeed had the power to harm him.

138. The LAPD spent **HOURS** in CRS after the shooting of G, yet there were no arrests. Mr. Jones witnessed the LAPD in the restroom pictured above, yet no arrests were made.

139. The morning after the shooting, Mr. Jones and several others arrived at CRS and G's blood was still on the floor of the restroom, and Mr. Combs hired a cleaning crew to clean it up.

**DEFENDANTS ETHIOPIA HABTEMARIAM, LUCIAN CHARLES GRAINGE,
MOTOWN RECORDS, LOVE RECORDS, AND UNIVERSAL MUSIC GROUP
AIDED, ABETTED, AND PROFITED OFF OF
SEAN COMBS RICO ENTERPRISE**

140. Mr. Jones recalls seeing Defendant Grainge¹⁵ visiting Mr. Combs home in Miami, Florida, and Los Angeles, California.

¹⁵ TikTok is one of the most important short video platforms in the world. It has a significant impact on the spread of global music. Today it is believed that artists are paying more and more attention to producing music suitable for dissemination on TikTok. Due to failed contractual renewal negotiations between Universal and TikTok, a lot of music

141. According to Mr. Jones, whenever Defendant Grainge visited Mr. Combs at his homes, it would be in the evening, and he and Mr. Combs would disappear for hours in Mr. Combs bedroom.

142. Defendant Grainge sponsored and attended several Love Album listening parties at Mr. Combs' home in Los Angeles, California. These parties were sponsored by Defendants MR, LR, and UMG. As evidence above, these parties had sex workers and underage girls present.

143. During these parties, Defendant Grainge knew or should have known that Mr. Combs was drugging the attendees through laced bottles of DeLeon Tequila, and Ciroc Vodka.



144. It is no secret that Mr. Combs had specific bottles of alcohol designated for females, and other bottles designated for his staff, his artists, and himself. This fact was detailed by former artists and bodyguards of Mr. Combs.

145. As a sponsor of these events, Defendant Grainge had a duty and obligation to ensure that sex workers and underage girls were not present, and that Mr. Combs was not spiking the alcohol with date rape drugs.

146. On YouTube Channel, the Art of Dialogue, former bodyguard Gene Deal exposed Mr. Combs Pill Mixing method used to spike cranberry juice and orange juice. According to Mr. Deal, Mr. Combs would place ecstasy and other date rape drugs in the juices¹⁶.

147. On YouTube, the Art of Dialogue, former artist Mark Curry exposed Mr. Combs spiking bottles of Moet champagne in the VIP section of night clubs. Mr. Combs would have a set of Moet champagne bottles for his artists, and a set for women¹⁷.

had to be removed from TikTok. This comes from the alleged lack of protection TikTok takes to ensure UMG artists' rights and creativity is preserved as well as fair compensation. On the contrary it has been alleged that the renewal failed due to UMG's own financial agenda and putting their interest first before the artist. This move has costs artists affected huge opportunities to further their growth and development within their art as well as huge financial loss. However, UMG will still continue to profit off these artist whether their music will be released back to TikTok or not.

¹⁶ <https://youtu.be/MFIP8b2IDeg?si=VVM397WmKXlnbHU->

¹⁷ https://youtu.be/pjvhfwUmMQw?si=6-5_W6evemGP_AI0

148. This writer has spoken with several former employees of Mr. Combs who witnessed Defendant Khorram instruct her staff to lace Champagne, DeLeon, and Ciroc liquor bottles with ecstasy and other illicit drugs.
149. Mr. Jones recalls seeing Defendant Habtemariam visiting Mr. Combs home in Miami, Florida, and Los Angeles, California.
150. According to Mr. Jones, whenever Defendant Habtemariam visited Mr. Combs at his homes, it would be in the evening, and she and Mr. Combs would disappear for hours in Mr. Combs bedroom.
151. According to Mr. Jones, Defendant Habtemariam visited Mr. Combs at Defendant CRS during Mr. Combs writing camp.
152. Defendant Habtemariam sponsored and attended several Love Album listening parties at Mr. Combs' home in Los Angeles, California. These parties were sponsored by Defendants MR, LR, and UMG. As evidence above, these parties had sex workers and underage girls present.
153. During these parties, Defendant Habtemariam knew or should have known that Mr. Combs was drugging the attendees through laced bottles of DeLeon Tequila, and Ciroc Vodka.
154. As a sponsor of these events, Defendant Habtemariam had a duty and obligation to ensure that sex workers and underaged girls were not present, and that Mr. Combs was not spiking the alcohol with date rape drugs.

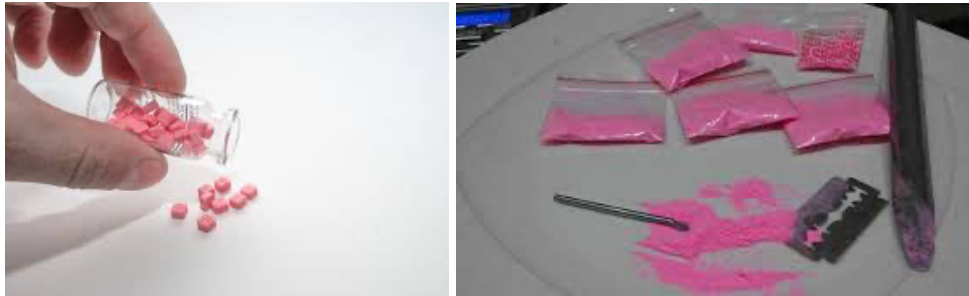
**DEFENDANT KRISTINA KHORRAM IS THE GHISLAINE MAXWELL
TO SEAN COMBS JEFFREY EPSTEIN**



155. According to Mr. Jones during the thirteen months he lived and traveled with Mr. Combs, he witnessed Mr. Combs display and distribute guns from his bedroom closet in Miami, Florida and Los Angeles, California to questionable individuals dressed in all black.

156. According to Mr. Jones during the thirteen months he lived and traveled with Mr. Combs, he witnessed Defendant Khorram openly order her assistants to keep Mr. Combs “high” off gummies and pills¹⁸.

157. Defendant Khorram required all employees from the butler, the chef to the housekeepers, to walk around with a pouch or fanny pack filled with cocaine, GHB, ecstasy, marijuana gummies (100 - 250 mg’s each), and Tuci (a pink drug that is a combination of ecstasy and cocaine).



TUCI

158. It was important to Defendant Khorram to have Mr. Combs’ drug of choice immediately ready when he asks for it.

159. Defendant Khorram ordered sex workers, and prostitutes for Mr. Combs.

160. Defendant Khorram ordered and distributed ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms to Mr. Combs and his celebrity guests who were present on his rented yacht, and in his homes in LA, NYC, and Miami.

161. On multiple occasions, Defendant Khorram forced Mr. Jones to carry Mr. Combs drug pouch against his will.

162. As the Chief of Staff, Defendant Khorram was instrumental in organizing and executing the RICO Enterprise. Defendant Khorram had the following individuals execute the following tasks for the RICO enterprise:

- a. **Stevie J:** Recruits sex workers and attends and participates in freak offs¹⁹.
- b. **Justin Combs:** Solicits Prostitutes, Underaged Girls, and Sex Workers. Would engage in Freak Offs.
- c. **Brendan Paul:** Works as Mr. Combs Mule. He acquires, and distributes, Mr. Combs Drugs, and Guns.

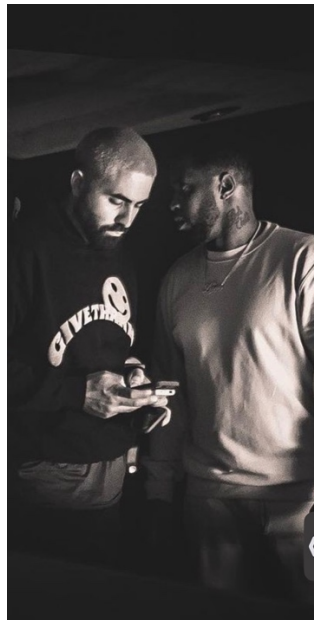
¹⁸ We have a recording of this and will provide it to the court.

¹⁹ We have a video of Mr. Combs, Stevie J, and Plaintiff Jones at a strip club. Mr. Combs is recording the video, while coaching and training Plaintiff Jones how to recruit the sex workers.



Brendan Paul and Mr. Combs

- d. **Frankie Santella**²⁰: Works alongside Brendan. While Brendan acquires, and distributes, Mr. Combs Drugs, and Guns. Frankie carries the money and pays for the Guns and Drugs.



Frankie Santella and Sean Combs

- e. **Moy Baun**: Hires sex workers, attends and participates in freak offs.

²⁰ Vice President of Music Management & Strategic Partnerships Vice President of Music Management & Strategic Partnerships, Combs Global.



Moy Baun, Thanksgiving 2022 When Mr. Combs Offered Mr. Jones Cocaine.

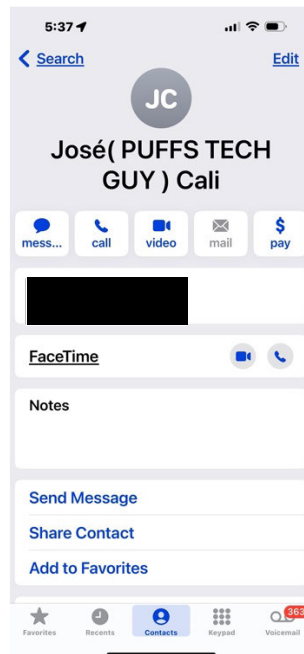
163. Mr. Combs funded and used his affiliation with local gangs and gang leaders²¹ who would frequent his homes in LA, and Miami to secure the drugs and guns he obtained and distributed out of his homes in LA and Miami.
164. Defendants executed their RICO Enterprise with threats of violence: threatening to eat Plaintiff's face, displaying and distributing guns in Plaintiff's presence, bragging about having law enforcement under control, bragging about murdering people, and bragging about bribing witnesses, and jurors in the criminal case concerning the 1999 NYC nightclub shooting with Shyne.
165. Defendants executed their RICO Enterprise with threats of isolation from the music and entertainment industry: parading powerful music industry executives such as Defendants Lucian Charles Grainge, Ethiopia Habtemariam at his parties filled with sex workers, minors, and illegal drugs, such as ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms.
166. Defendants executed their RICO Enterprise with threats of nonpayment for work completed, fake promises of cash payments (\$250,000), producer of the year Grammy awards, and guaranteed access to future projects, and a \$20 million dollar home on Star Island in Miami.

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²¹ Plaintiff has intentionally left the names, and images of these individuals out of the pleading out of fear of retaliation.

MR. COMBS IS ALLOWED TO WREAK HAVOC

167. While living and traveling with Mr. Combs, Mr. Jones discovered that Mr. Combs has hidden cameras in every room of his homes.
168. Mr. Jones believes that Mr. Combs has recordings of Defendants Lucian Charles Grainge, Ethiopia Habtemariam, as well as other celebrities, music label executives, politicians, and athletes.
169. Upon information and belief, these individuals were recorded without their knowledge and consent, and as is the case with the homosexual sex tape of Stevie J that Mr. Combs provided to Mr. Jones, Mr. Combs possesses compromising footage of every person that has attended his freak off parties, and his house parties.
170. Upon information and belief, due to this treasure trove of evidence he has in his possession, Mr. Combs believes that he is above the law and is untouchable.
171. Upon information and belief, Mr. Combs employs Jose Cruz as his IT director. This writer has spoken to several former employees of Mr. Combs, who confirmed that Jose Cruz is the gatekeeper to all of Mr. Combs recordings.
172. Upon information and belief, Jose Cruz intentionally hides behind the camera, and from social media and the internet due to all of the incriminating acts he was required to record for Mr. Combs.



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FIRST CAUSE OF ACTION
CONDUCT AND PARTICIPATE IN A RICO ENTERPRISE
THROUGH A PATTERN OF RACKETEERING ACTIVITY
VIOLATION OF RACKETEER INFLUENCED AND
CORRUPT ORGANIZATION ACT, CODIFIED AT 18 U.S.C. § 1962(A), (C)-(D)
(against, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Sean Combs, Justin
Combs, Kristina Khorram, Combs Global, Motown Records, Love Records, And
Universal Music Group)

173. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

174. As respondent superior, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group (“the respondent superior collective”) are 100% liable for the actions of Sean Combs, Justin Combs, Kristina Khorram as they were acting in their capacities as the respondent superior collectives’ employees when they committed the acts detailed below. The respondent superior collective failed to adequately monitor, warn, or supervise the actions of Sean Combs, Justin Combs and Kristina Khorram.

175. Defendants are individuals and/or entities within the meaning of “person” as defined in 18 U.S.C. § 1961(3) because each is capable of holding, and does hold, “a legal or beneficial interest in property.” The association is composed of Lucian Charles Grainge, Ethiopia Habtemariam, Sean Combs, Justin Combs, Kristina Khorram, Combs Global, Motown Records, Love Records, Universal Music Group, JOHN, and JANE DOES 1-10, and ABC CORPORATIONS 1-10.

176. Section 1962(a) makes it:

unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity or through a collection of an unlawful debt in which such person has participated as a principal within the meaning of Section 2, Title 18, United States Code, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in the acquisition of any interest in, or the establishment or operation of, any enterprise which is engaged in, or the activities of which affect interstate or foreign commerce. 18 U.S.C. § 1962(a).

177. Section 1962(c) makes it:

unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise’s affairs through a pattern of racketeering activity. 18 U.S.C. § 1962(c).

178. Section 1962(d) makes it unlawful for “any person to conspire to violate” Section 1962(a) and (c), among other provisions. 18 U.S.C. § 1962(d).
179. Defendants are associated with each other as an enterprise within the meaning of “enterprise” as defined in 18 U.S.C. § 1961(4).
180. Defendants have unlawfully increased their profits by luring, and deceiving producers, musicians, writers, creators, and artists such as Plaintiff to transport drugs (ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms), transport firearms, solicit minors, exotic dancers, sex workers, and to utilize their talents and labor to produce music, and other tangible goods and services without compensation.
181. The RICO enterprise, which all Defendants have engaged in, and the activities of which affected interstate and foreign commerce, is comprised of an association, in fact, of persons, including each Defendant and other unnamed co-conspirators. That association, in fact, was structured by various contracts and non-contractual relationships between the Defendants, by which Defendants assumed different roles in agreeing to carry out a mail and wire fraud scheme to acquire drugs, firearms, prostitutes, minors, sex workers and the labor of producers, musicians, writers, creators, and artists such as Plaintiff to utilize their talents and labor to produce music, and other tangible goods and services without compensation.
182. The members of the RICO enterprise all share a common purpose: to enrich themselves financially and sexually at the expense of producers, musicians, writers, creators, and artists by maximizing Defendants’ revenues through fraudulent means. As set forth herein, Defendants benefitted financially from their scheme to defraud Plaintiff, by intimidating Plaintiff with threats of violence (threatening to eat Plaintiff’s face, displaying and distributing guns in Plaintiff’s presence, bragging about having law enforcement under control, bragging about murdering people, and bragging about bribing witnesses, and jurors in the criminal case concerning the 1999 NYC nightclub shooting with Shyne), threats of isolation from the music and entertainment industry (parading powerful music industry executives such as Defendants Lucian Charles Grainge, Ethiopia Habtemariam at his parties filled with sex workers, minors, and illegal drugs, such as ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms), threats of nonpayment for work completed, fake promises of cash payments (\$250,000), producer of the year Grammy awards, and guaranteed access to future projects, a \$20 million

dollar home on Star Island in Miami, which Defendants would not have done but for the existence of the scheme.

183. The members of the RICO enterprise all share a common purpose: to enrich themselves financially and sexually at the expense of producers, musicians, writers, creators, and artists by maximizing Defendants' revenues through fraudulent means. As set forth herein, Defendants benefitted financially from their scheme to defraud Plaintiff, including by making false representations that claim that loyalty and obedience to Mr. Combs will result in cash payments (\$250,000), Grammy awards, access to future projects, access to famous celebrities, access to famous athletes, a \$20 million home on Star Island in Miami. Promises that Plaintiff can increase his chances of securing cash payments (\$250,000), Grammy awards, access to future projects, access to famous celebrities, access to famous athletes, a \$20 million home on Star Island in Miami by soliciting sex workers, by soliciting prostitutes, by engaging in homosexual acts, by distributing and transporting firearms, by distributing and transporting drugs (ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms), by involuntarily sleeping with sex workers in the presence of Mr. Combs, and by utilizing their talents and labor to produce music, and other tangible goods and services without compensation, which Defendants would not have done but for the existence of the scheme.

184. Upon information and belief, this RICO enterprise has existed for at least 20 years, dating back to the 1999 Nightclub shooting in NYC, when Mr. Combs required his then-girlfriend, Jennifer Lopez, to transport his illegal firearm into the NYC nightclub. Mr. Combs forced his then-artist, Shyne, to assume responsibility for the shooting of several individuals. Mr. Combs used his power, money, and influence to bribe jurors and witnesses, such as the friend of the shooting victim, Natania Reuben, who reported to law enforcement that she saw Mr. Combs and not Shyne pull the trigger and shoot her friend in the face. Natania Reuben later testified at Mr. Combs' criminal trial that she was tying her shoe and may not have seen who shot the gun. She later confessed that Mr. Combs paid her.

185. The RICO enterprise continued throughout the years, including during Mr. Combs's ten-year relationship with his girlfriend, Cassie Ventura. According to Ms. Ventura's civil complaint, this RICO enterprise continued in her relationship when Mr. Combs forced her to carry his gun in her purse, forced her to engage in unwanted sexual acts with male prostitutes/sex workers, forced her to consume dangerous amounts of ecstasy, cocaine, GHB,

ketamine, marijuana and alcohol, and paying a member of his security team \$5,000, to blow up the vehicle of Kid Cudi because he was jealous and insecure of their relationship.

186. The RICO enterprise continued from September 2022 to the present day. As evidenced by the hundreds of hours of video and audio recordings in Plaintiff's possession, Defendants Sean Combs, Justin Combs, Kristina Khorram, his assistants and staff all orchestrated, participated, managed and executed the RICO Enterprise by purchasing and distributing ecstasy, cocaine, GHB, ketamine, marijuana, and mushrooms, by purchase and distributing firearms, by requiring the solicitation of sexual encounters with prostitutes, sex workers, and minors, and by forcing artists, creatives, musicians, and producers to utilize their talents and labor to produce music, and other tangible goods and services without compensation. The RICO enterprise has functioned as a continuing unit and maintains an ascertainable structure separate and distinct from the pattern of racketeering activity.

187. The enterprise was characterized by the Defendants' pattern of false representations and omissions made by Defendants Sean Combs, Justin Combs, Kristina Khorram, and other current and former members of the Defendants' associates and staff to Defendants' artists, creatives, musicians, and producers. These false representations and omissions were designed to induce Defendants' artists, creatives, musicians, and producers to utilize their talents and labor to produce music and other tangible goods and services without compensation, as well as the solicitation of sexual encounters with prostitutes, sex workers, and minors, and the purchasing and distribution of illegal firearms and drugs.

188. As part of this scheme, Defendants required their artists, creatives, musicians, and producers to visit strip clubs wearing exclusive authentic Bad Boy merchandise and to use the name and reputation of Mr. Combs to solicit sex workers and prostitutes. Additionally, Mr. Combs used the prospects of winning Grammy awards, purchasing \$20 million dollar homes, participating in future projects, making \$250,000 cash payments, and meeting influential music industry executives such as Defendants Lucian Charles Grainge and Ethiopia Habtemariam. This pattern of false representations was disseminated to artists, creatives, musicians, and producers who reside in California, Florida, New York, and around the country by Defendants based in California and New York under the direction and on behalf of Defendants in New York. The dissemination typically used interstate telephone wires, social media messages, and electronic mail.

189. The true nature of Defendants' scheme was left undisclosed, was omitted, and/or was affirmatively misrepresented, all to fraudulently increase Defendants' profits, at least some of which were used to expand the enterprise, causing further injury to Plaintiff Jones and other unwitting artists, creatives, musicians, and producers.

190. Defendants profited from the enterprise, and Plaintiff Jones suffered because the enterprise diminished Plaintiff Jones finances due to 13 months of nonpayment and diminished Plaintiff Jones health through consistent drugging and forced sexual encounters with prostitutes and sex workers. Defendants used the proceeds from this scheme to advance the scheme by funding and operating their marketing machine, including through the use of the mail, social media, word of mouth, and interstate wires to sell the illusion that Mr. Combs was serious about the talents and skills of the artists, creatives, musicians, and producers, and wanted to use those skills to make music when nothing could be further from the truth. Defendants provided their artists, creatives, musicians, and producers with this misrepresentative information, including via email all over interstate wireline communications systems and obtaining free labor, the distribution of drugs and firearms, as well as prostitutes, sex workers, and minors. Defendants obtained revenue via wire transfers, documents, and banking transactions that were exchanged via electronic means over interstate wires, thereby growing the enterprise and causing further injury to Plaintiff Jones as described throughout.

191. The Defendants' scheme was reasonably calculated to deceive Plaintiff Jones, artists, creatives, musicians, and producers of ordinary prudence and comprehension through the execution of their complex and illegal scheme to misrepresent the effectiveness of soliciting prostitutes, sex workers, and minors and distributing drugs and guns that did not, would not, and could not lead to securing Grammy Awards, purchasing \$20 million homes, participating on future projects, \$250,000 cash payments, and meeting influential music industry executives such as Defendants Lucian Charles Grainge, and Ethiopia Habtemariam. Plaintiff Jones would not have lived with Mr. Combs for 13 months, missing birthdays, holidays, and family events, but for the illegal racketeering scheme operated by Defendants.

192. Defendants each had the specific intent to participate in the overall RICO enterprise and the scheme to defraud Plaintiff Jones and each participated in the enterprise as follows:

193. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group control and participate in the activities

of the enterprise in a variety of ways as set forth herein, including but not limited to developing and marketing scores of writing camps, and listening parties services that are marketed to innocent, unassuming artists, creatives, musicians, and producers who are vulnerable and in seek of opportunities to work and share their craft.

194. Throughout the relevant period, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group oversaw the activities of Defendants Sean Combs, Justin Combs, Kristina Khorram and other current and former members of the Defendants' associates and staff (collectively, "Individual Defendants"). Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group has an ethical obligation as respondent superior to supervise the actions and activities of the individual defendants. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group failed miserably to do so. Individual defendants relied on the mail, email, social media, and the telephone to distribute advertisements to secure artists, creatives, musicians, and producers whom they would promise Grammy Awards, purchasing \$20 million dollar homes, participating on future projects, \$250,000 cash payments, and meeting powerful music industry executives such as Defendants Lucian Charles Grainge, Ethiopia Habtemariam. These advertisements originated from and were sent from Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group's offices in the state of New York to consumers in New York and around the country, relying on the mail, email. social media messenger, and telephone to distribute and interstate wires to disseminate the misleading information described herein as well as to receive profits from the artists, creatives, musicians, and producers.

195. In connection with Defendants acting from New York, these Defendants used the mail and interstate wires to solicit Plaintiff Jones and artists, creatives, musicians, and producers, and to use Plaintiff Jones and the artists, creatives, musicians, and producers to utilize their talents and labor to produce music, and other tangible goods and services without compensation, as well as the solicitation of sexual encounters with prostitutes, sex workers, and minors, and the purchasing and distribution of illegal firearms and drugs. Each of these acts was undertaken

with the knowledge and approval of all other Defendants in furtherance of the goals of their conspiracy.

196. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group, directs, controls, and participates in the activities of the enterprise in a variety of ways as set forth herein, including as the employer, parent company, sponsor and respondent superior of Defendants Sean Combs, Justin Combs, Kristina Khorram and other current and former members of the Defendants' associates and staff. Throughout the relevant period, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Combs Global, Motown Records, Love Records, and Universal Music Group, oversaw the marketing and soliciting of potential artists, creatives, musicians, and producers from their Headquarters in New York, California and Florida to consumers in New York, California and Florida, and around the country, relying on the mail, email, social media, text messages, and WhatsApp messages to distribute, interstate wires to disseminate the misleading information described herein as well as to receive profits from the artists, creatives, musicians, and producers from their forced solicitation of sex workers, and the solicitation of sexual encounters with prostitutes, sex workers, and minors, and the purchasing and distribution of illegal firearms and drugs. Each of these acts was undertaken with the knowledge and approval of all other Defendants in furtherance of the goals of their conspiracy.
197. Robin Greenhill, the accountant, would ensure the wiring, funds transfer, or cash payments to sex workers. Frankie Santella, Moy Baun, Brendan Paul, and KK would also be responsible for ensuring payment to sex workers in cash. Yung Miami, Jade, and Daphne Joy were paid a monthly fee to work as Mr. Combs' sex workers and received payment via wire transfer from Robin Greenhill which outlined Defendants ongoing criminal operation.
198. During the ten (10) years preceding the filing of this action and to the present, all Defendants did cooperate jointly and severally in the commission of three (3) or more of the predicate acts that are itemized at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. 1962(d), as described in this Complaint.
199. Beginning at an exact date unknown to Plaintiff, but within ten (10) years preceding the filing of this action, Defendants have knowingly, willfully, and unlawfully participated in a pattern of racketeering activity that continues to this day.

200. The acts set below (“Racketeering Acts”) had the same pattern and purpose to defraud Plaintiff for the benefit of Defendants. Each Racketeering Act involved the same or similar methods of commission and participants.
201. Without the repeated predicate acts, the ability to conduct their fraud using the mail and telecommunications wires, and the money laundering, the Defendants’ business would not have succeeded.
202. The separate Racketeering Acts all relate to each other in that they were part of concerted actions by Defendants to use the endorsement and channels of the enterprise to operate their businesses to fraudulently induce Plaintiff Jones and the artists, creatives, musicians, and producers to utilize their talents and labor to produce music, and other tangible goods and services without compensation, as well as the solicitation of and sexual encounters with prostitutes, sex workers, and minors, and the purchasing and distribution of illegal firearms and drugs.
203. The separate Racketeering Acts all relate to each other in that they were part of concerted actions by Defendants to use the endorsement and channels of the enterprise to operate their businesses to fraudulently induce Plaintiff Jones and the artists, creatives, musicians, and producers to utilize their talents and labor to produce music, and other tangible goods and services without compensation, as well as the solicitation of and sexual encounters with prostitutes, sex workers, and minors, and the purchasing and distribution of illegal firearms and drugs.
204. The Defendants’ wrongful conduct has caused injury to Plaintiff Jones, remains a part of their ongoing business practices, and remains a continuing threat to Plaintiff Jones and the public.
205. Defendants’ association with the enterprise enabled Defendants to conduct, direct, and control a pattern of fraudulent, illegal activities over a substantial number of years, which continues to this day.
206. To further their goals, Defendants, working in concert, engaged in various forms of criminal activity, including the solicitation of and sexual encounters with prostitutes, sex workers, and minors, and the purchasing and distribution of illegal firearms and drugs.
207. Defendants’ ongoing pattern of racketeering activity has injured and continues to injure Plaintiff Jones. The Defendants’ pattern of forcing Plaintiff Jones and the artists, creatives,

musicians, and producers to solicit sexual encounters with prostitutes, sex workers, and minors, and to purchase and distribute illegal firearms and drugs was the proximate cause of the injuries suffered by Plaintiff.

Defendants Committed Multiple Acts of Mail Fraud in Violation of 18 U.S.C. § 1341 in Furtherance of the Enterprise

208. Defendants voluntarily and intentionally devised and participated in a scheme to defraud Plaintiffs out of money, in reliance on the mail. Defendants committed these acts with the intent to defraud Plaintiff Jones and the artists, creatives, musicians, and producers.

209. Defendants used the mail for the purpose of executing the fraudulent scheme herein.

210. Specifically, Defendants agreed to each of the acts of mail fraud described throughout this Complaint. In addition, Defendants agreed to rely on the mail to secure wire frauds, cash payments from purchasers of the illegal firearms and drugs Defendants required others to sell and distribute.

211. In furtherance of and for purposes of executing the above-described fraudulent and illegal course of conduct and scheme to defraud, Defendants, either individually or in combination with themselves, used and caused to be used the U.S. mail by both placing and causing to be placed cash, letters, marketing materials, advertisements, agreements and other matters in depositories and by removing or causing to be removed letters and other mailable matters from depositories, in violation of the mail fraud statute, 18 U.S.C. § 1341.

212. Defendants could not have furthered their fraud without the use of the mail. For example, Defendants sought to acquire wire transfers, cash payments, and to utilize their talents and labor to produce music, and other tangible goods and services without compensation. Defendants also required the mail to distribute misleading advertisements to various states, including New York. For these reasons, the use of mail to conduct fraudulent activity was necessary and inevitable.

Defendants Committed Multiple Acts of Wire Fraud in Violation of 18 U.S.C. § 1343 in Furtherance of the Enterprise

213. Defendants voluntarily and intentionally devised and participated in a scheme to defraud Plaintiff out of money, in reliance on the mail. Defendants committed these acts with the intent to defraud Plaintiff Jones and the artists, creatives, musicians, and producers.

214. Specifically, Defendants agreed to each of the acts of wire fraud described throughout this Complaint. In addition, Defendants agreed to rely on interstate wires to disseminate funds and

to submit payment to sex workers and prostitutes, as well as to transfer payment for the distribution and procurement of drugs and guns. Defendants illegally acquired wire transfers, money transfers, credit cards, and bank cards via search engines and other online platforms to further their collective goal of furthering their RICO enterprise. Defendants knew that these online purchases were illegally made.

215. Additionally, Defendants agreed that Defendants should facilitate these fraudulent purchases over interstate wires in furtherance of the fraud. Sex workers, and prostitutes nationwide have received payment from Defendants.

216. In furtherance of and for purposes of executing the above-described fraudulent and illegal course of conduct and scheme or artifice to defraud, Defendants, either individually or in combination with themselves, used or caused to be used interstate wire communications to transmit or disseminate false, fraudulent, and misleading communications and information, in violation of the wire fraud statute, 18 U.S.C. § 1343.

217. Defendants could not have furthered their fraud without the ability to use telecommunications to share information with clients and retailers nationwide. Because Defendants needed to communicate with clients and retailers around the country, the use of interstate telecommunications wires to conduct the fraudulent activity was necessary and inevitable.

218. Plaintiffs have been damaged in their business or property because Defendants violated 18 U.S.C. § 1962(a), (c)-(d)), and, therefore, he is entitled to recover the damages and other remedies enumerated therein.

219. Defendants' acts or omissions were actuated by actual malice and/or a willful and wanton disregard for the consequences suffered by the Plaintiff and/or with knowledge of a high degree of probability of harm to the Plaintiff and reckless indifference to the consequences of their acts or omissions.

220. Compensatory damages alone will be insufficient to deter such conduct in the future. There needs to be a criminal referral to the United States Justice Department, as well as to the States Attorney General's Office.

WHEREFORE, Plaintiff requests that the Court issue an Order and grant Judgment to the Plaintiffs as follows:

- a. Granting Plaintiff statutory, common law, and punitive damages, and applicable pre- and post-judgment interest, in full recompense for damages;²²
- b. Entering judgment according to the declaratory relief sought;
- c. Granting Plaintiff such other and further relief, including, without limitation, injunctive and equitable relief, as the Court deems just in all the circumstances; and
- d. Granting Plaintiff an Incentive or Service Award reflective of the work done in prosecuting this action, the time spent, the effort and hard costs invested, and results obtained, in light of the Court's judgment informed by awards in other similar cases of comparable difficulty and complexity.

SECOND CAUSE OF ACTION
SEXUAL ASSAULT AND SEXUAL HARASSMENT
(against Mr. Combs)

221. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.
222. As described above, Mr. Combs frightened and placed Plaintiff in apprehension of harm when he physically and sexually assaulted him from October 2022 to October 2023 in Mr. Combs home in Miami, New York, United States Virgin Islands, and Los Angeles.
223. Mr. Combs forcibly touched and attempted and/or threatened to touch Plaintiff's intimate areas and/or touched Plaintiff with his own intimate body parts.
224. Mr. Combs violently gripped and palmed Mr. Jones anus and crotch without consent. Mr. Combs forced Mr. Jones to work in Mr. Combs' bathroom and watch Mr. Combs as he showered. Mr. Combs forced Mr. Jones to work in the studio while Mr. Combs stripped naked to get his body massaged. Mr. Combs forced Mr. Jones to work while Mr. Combs walked around naked.
225. As a result of Mr. Combs' conduct, Plaintiff has suffered and continues to suffer harm, including physical injury, severe emotional distress, humiliation, anxiety, and other consequential damages for which he is entitled to an award of monetary damages and other relief.
226. The conduct of Mr. Combs described above was willful, wanton, and malicious. At all relevant times, Mr. Combs acted with conscious disregard for Plaintiff's rights and feelings, acted with the knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause fear, physical injury

²² Damages shall include, but not be limited to, all damages permitted under the New Jersey Racketeer Influenced and Corrupt Organizations Act.

and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive damages.

THIRD CAUSE OF ACTION
CALIFORNIA'S BYSTANDER NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS
(against, Mr. Combs and Defendant Justin Combs)

227. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.
228. Mr. Jones brings this claim against Mr. Combs and J. Combs for the CRS shooting of G.
229. The elements of Bystander NIED are: (1) is closely related to the injury victim; (2) is present at the scene of the injury-producing event at the time it occurs and is then aware that it is causing injury to the victim; and (3) as a result suffers serious emotional distress—a reaction beyond that which would be anticipated in a disinterested witness and which is not an abnormal response to the circumstances.” *Ra v. Superior Court*, 154 Cal. App. 4th 142, 148, 64 Cal. Rptr. 3d 539, 542 (2007).
230. As detailed above, Mr. Jones was 2 feet away from G, as either J. Combs or Mr. Combs shot him multiple times in the restroom of CRS. As detailed above, Mr. Jones was the only individual that aided G as he laid on the bathroom floor in a fetal position bleeding out. As detailed above, Mr. Combs and J. Combs orchestrated a coverup, and through Faheem Muhammad, lied to the LAPD and forced Mr. Jones and all of the other attendees of the writers camp to lie to the police as well. Mr. Combs and J. Combs knew that they shot G in the restroom, and that G was shot as he was leaving the studio.
231. Mr. Combs and J. Combs’ intentional deception caused a delay in G receiving immediate medical care, as the ambulance parked 3 blocks away from CRS out of fear that there was an active shooting. Mr. Jones had to run down the block and convince them that the shooting had ended.
232. These events traumatized Mr. Jones. It caused Mr. Jones to suffer from insomnia, PTSD, severe anxiety, and depression. Additionally, the fear and silence from the remaining witnesses aided in the reinforcement of Mr. Combs statements that he is untouchable.
233. As a result of Mr. Combs and J. Combs conduct, Plaintiff Jones has suffered and continues to suffer harm, including severe emotional distress, anxiety, and other consequential damages for which he is entitled to an award of monetary damages and other relief.

234. The conduct of Mr. Combs and J. Combs described above was willful, wanton, and malicious. At all relevant times, Mr. Combs and J. Combs acted with conscious disregard for Plaintiff's rights and feelings, acted with the knowledge of or with reckless disregard for the fact that their conduct was certain to cause injury to Plaintiff, and intended to cause fear, physical injury and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive damages.

FOURTH CAUSE OF ACTION
SEXUAL ASSAULT
(against Jane Doe 1 (Yung Miami's Cousin))

235. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

236. As described above, Jane Doe 1 frightened and placed Plaintiff in apprehension of harm when she physically and sexually assaulted him on Thanksgiving Day 2022, in Mr. Combs home in Miami Florida.

237. Jane Doe 1 forcibly touched and attempted and/or threatened to touch Plaintiff's intimate areas and/or touched Plaintiff with her own intimate body parts. Jane Doe 1 used her mouth and performed oral sex on Plaintiff while he was urinating in the restroom. Plaintiff fought her off, while Mr. Combs and his associates sat outside loudly laughing. Jane Doe 1 then followed Mr. Jones outside of the restroom and began undressing in front of Mr. Combs and his associates, straddled Mr. Jones and attempted to have forced sexual intercourse with him.

238. As a result of Jane Doe 1's conduct, Plaintiff has suffered and continues to suffer harm, including physical injury, severe emotional distress, humiliation, anxiety, and other consequential damages for which he is entitled to an award of monetary damages and other relief.

239. The conduct of Jane Doe 1 described above was willful, wanton, and malicious. At all relevant times, Jane Doe 1 acted with conscious disregard for Plaintiff's rights and feelings, acted with the knowledge of or with reckless disregard for the fact that her conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause fear, physical injury and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive damages.

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FIFTH CAUSE OF ACTION
PREMISES LIABILITY FOR THE SEXUAL ASSAULT COMMITTED BY
JANE DOE 1 (YUNG MIAMI'S COUSIN)
(against Mr. Combs)

240. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

241. Mr. Jones was sexually assaulted by Jane Doe 1 in Miami, Florida on Thanksgiving 2022. Mr. Combs was present while Mr. Jones was being assaulted by Jane Doe 1. Mr. Jones was legally on the premises as a guest and invitee of Mr. Combs. Jane Doe 1 was legally on the premises as a guest and invitee of Mr. Combs. Mr. Combs owned the premises and had dominion and control over the premises where Mr. Jones was harmed. Mr. Combs had dominion and control over the actions of Jane Doe 1 and failed to step in and stop Jane Doe 1 from sexually assaulting Mr. Jones.

242. As the owner of the property, Mr. Combs had a duty to protect Mr. Jones from the harm he suffered at the hands of Jane Doe 1. Mr. Combs breached his duty when he failed to stop Jane Doe 1 from sexually assaulting Mr. Jones. In furtherance of this breach, Mr. Combs was laughing and encouraging Jane Doe 1 to continue her assault of Mr. Jones. Mr. Jones has suffered immensely because of Mr. Combs intentional breach of his duty to him.

243. As a result of Mr. Combs breach of his duty, Mr. Jones has suffered and continues to suffer harm, including severe emotional distress, anxiety, and other consequential damages for which he is entitled to an award of monetary damages and other relief.

244. The conduct of Mr. Combs described above was willful, wanton, and malicious. At all relevant times, Mr. Combs acted with conscious disregard for Plaintiff's rights and feelings, acted with the knowledge of or with reckless disregard for the fact that their conduct was certain to cause injury to Plaintiff, and intended to cause fear, physical injury and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive damages.

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SIXTH CAUSE OF ACTION
PREMISES LIABILITY FOR THE SEXUAL ASSAULT COMMITTED
BY CUBA GOODING, JR.
(against, Mr. Combs)

245. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

246. Here, Mr. Jones was sexually assaulted by Cuba Gooding Jr. on a yacht rented by Mr. Combs in the US Virgin Islands in January 2023. Mr. Combs was present while Mr. Jones was being assaulted by Cuba Gooding Jr. Mr. Jones was legally on the premises as a guest and invitee of Mr. Combs. Cuba Gooding Jr was legally on the premises as a guest and invitee of Mr. Combs. Mr. Combs owned (through renting) the premises and had dominion and control over the premises where Mr. Jones was harmed. Mr. Combs had dominion and control over the actions of Cuba Gooding Jr and failed to step in and stop Cuba Gooding Jr from sexually assaulting Mr. Jones.

247. As the owner of the property, Mr. Combs had a duty to protect Mr. Jones from the harm he suffered at the hands of Cuba Gooding Jr. Mr. Combs breached his duty when he failed to stop Cuba Gooding Jr from sexually assaulting Mr. Jones. In furtherance of this breach, Mr. Combs encouraged Cuba Gooding Jr to continue his assault of Mr. Jones when he said that Cuba Gooding Jr should privately get to know Mr. Jones better. Mr. Jones has suffered immensely because of Mr. Combs intentional breach of his duty to him.

248. As a result of Mr. Combs breach of his duty, Mr. Jones has suffered and continues to suffer harm, including severe emotional distress, anxiety, and other consequential damages for which he is entitled to an award of monetary damages and other relief.

249. The conduct of Mr. Combs described above was willful, wanton, and malicious. At all relevant times, Mr. Combs acted with conscious disregard for Plaintiff's rights and feelings, acted with the knowledge of or with reckless disregard for the fact that their conduct was certain to cause injury to Plaintiff, and intended to cause fear, physical injury and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive damages.

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SEVENTH CAUSE OF ACTION
TRAFFICKING AND VICTIMS' PROTECTION ACT
(against, Defendants Sean Combs, Justin Combs, Kristina Khorram, And
Combs Global)

250. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.
251. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global knowingly and intentionally participated in, perpetrated, assisted, supported, facilitated a sex-trafficking venture that was in and affecting interstate and foreign commerce, together and with others, in violation of 18 U.S.C. § 1591(a)(1).
252. Among other things, Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global knowingly and intentionally recruited, enticed, provided, obtained, advertised, and solicited by various means Mr. Jones, as well as other Class Members, knowing that Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global would use means of force, threats of force, fraud, coercion, and a combination of such means to cause Mr. Jones, as well as others, some of whom were under the age of seventeen, to engage in commercial sex acts.
253. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global and its employees had actual knowledge that they were perpetrating and facilitating Mr. Combs' sexual abuse and sex trafficking conspiracy to recruit, solicit, entice, coerce, harbor, transport, obtain, and provide Mr. Jones as well as others whom were under the age of seventeen, into commercial sex acts, through the means of force, threats of force, fraud, abuse of process, and coercion.
254. Despite such knowledge, Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global intentionally paid for, facilitated, perpetrated, and participated in Mr. Combs' violations of 18 U.S.C. § 1591(a)(1), which Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global knew, and were in reckless disregard of the fact that, Mr. Combs would coerce, defraud, and force Mr. Jones to engage in commercial sex acts.
255. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's actions were in and affecting interstate and foreign commerce, including its music distributing and publishing activities which were in and affecting interstate and foreign commerce.

256. By taking the concrete steps alleged in this complaint, Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global knowingly participated in sex trafficking and furthered the Combs' sex-trafficking venture. The concrete steps constituted taking part in the sex-trafficking venture and were necessary for its success. The concrete steps constituted active engagement by Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global in Mr. Combs's sex-trafficking venture. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global knew that its active engagement would lead to and cause coercive commercial sex-trafficking.
257. As part of perpetrating TVPA violations, between on or about September 12, 2022, and through about November 2023, Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global concealed its delivery of hundreds of thousands of dollars in cash to Mr. Combs and his associates.
258. As part of perpetrating TVPA violations, Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global also willfully failed to file required taxes with the federal government.
259. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's affirmative conduct was committed knowing, and in reckless disregard of the facts, that Mr. Combs would use cash and the financial support provided by Defendants Love Records, Motown Records, and the Universal Music Group as a means of defrauding, forcing, and coercing sex acts from Plaintiff Jones as well as others. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's conduct was outrageous and intentional. On or about January 2023 Justin Combs engaged in a freak off session on a yacht with his father and sex workers.
260. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's knowing and intentional conduct has caused Mr. Jones serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm.
261. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's knowing and intentional conduct has caused Mr. Jones harm that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity, in order to avoid incurring that harm.

262. This case does not involve mere fraud. Instead, Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's criminal conduct in perpetrating TVPA violations was outrageous and intentional, because it was in deliberate furtherance of a widespread and dangerous criminal sex trafficking organization. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's criminal conduct also evinced a high degree of moral turpitude and demonstrated such wanton dishonesty as to imply a criminal indifference to civil obligations. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's criminal conduct was directed specifically at Mr. Jones who was the victim of Mr. Combs' sexual abuse and sex trafficking harassment.

263. Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global's outrageous and intentional conduct in this case is part of a pattern and practice of Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global profiting by undertaking illegal "high risk, high reward" actions.

264. By virtue of these knowing and intentional violations of 18 U.S.C. §§ 1591(a)(1), 1595, Defendants Sean Combs, Justin Combs, Kristina Khorram, and Combs Global is liable to Mr. Jones for the damages they sustained and reasonable attorneys' fees.

265. By virtue of these intentional and outrageous violations of 18 U.S.C. § 1591(a)(1), 1595, Defendants Sean Combs, Justin Combs, Kristina Khorram is liable to Mr. Jones.

EIGHT CAUSE OF ACTION

CALIFORNIA PREMISE LIABILITY - INADEQUATE OR NEGLIGENT SECURITY (against, Defendants LR, MR, UMG, CRS, and Sean Combs)

266. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

267. At all times herein mentioned, Defendants LR, MR, UMG, CRS, AND SEAN COMBS, acting in the course and scope of their agency, employment, and representation of each other and with the knowledge, consent, direction, approval, and ratification of each other's act, omissions and conduct, on or about September 12, 2022 at the Chalice Recording Studios located at 845 Highland Ave, Los Angeles, CA 90038, did so negligently, carelessly and without due care, regard and concern for the rights, safety and health of the Plaintiff, and in regard to such premises did so control, own, supervise, manage, lease and had responsibility

for the safety of Plaintiff and adequate security, security personnel and security devices of the CRS.

268. At the aforementioned time and place, Defendants LR, MR, UMG, CRS, AND SEAN COMBS, and each of them, negligently maintained, managed, controlled, and operated the Chalice Recording Studios, in that they did not maintain and provide adequate security for the Plaintiff or the other artists, producers, and songwriters and creatives who attended Sean Combs Love Album writers camp. Defendants knew, or in the exercise of reasonable care should have known, security was required and necessary and the lack of such security could constitute a dangerous condition and unreasonable risk of harm of which Plaintiff was at all times herein mentioned unaware. Defendants LR, MR, UMG, CRS, AND SEAN COMBS had security check the song writers, producers, and artists, but neglected to search Justin Combs and Sean Combs for the possession of firearms when they entered CRS. Defendants LR, MR, UMG, CRS, AND SEAN COMBS negligently failed to take steps to either provide adequate security and make the condition safe or warn Plaintiff of the dangerous condition, all of which caused Plaintiff to suffer injuries.

269. As a proximate result of the negligence of defendants, and each of them, Plaintiff was hurt and injured in his health, strength, and activity, sustaining injuries to their nervous system and person, all of which injuries have caused, and continue to cause, Plaintiff great mental, physical, and nervous pain and suffering. As a result of such injuries, Plaintiff have suffered general damages in an amount according to proof.

270. As a further proximate result of the negligence of defendants Plaintiff has incurred, and will continue to incur, medical and related expenses in an amount according to proof.

WHEREFORE, Plaintiff pray for judgment against Defendants, and each of them, as follows:

- a. General damages according to proof;
- b. For actual medical expenses incurred;
- c. For future medical expenses, according to proof;
- d. For loss of earning;
- e. For interest, according to law;
- f. For costs of suit incurred herein; and
- g. For such other and further relief as the Court may deem just and proper.

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NINTH CAUSE OF ACTION
AIDING, ABETTING, AND INDUCING A SEX-TRAFFICKING VENTURE IN
VIOLATION OF THE TRAFFICKING VICTIMS’
PROTECTION ACT, 18 U.S.C. §§ 2, 1591(a)(1) & (2), 1595
(against Defendants Lucian Charles Grainge, Ethiopia Habtemariam,
Motown Records, Love Records, Universal Music Group)

271. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.
272. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group aided, abetted, and induced Sean Combs’ sex-trafficking venture that was in and affecting interstate and foreign commerce, together and with others, in violation of 18 U.S.C. §§ 2, 1591(a)(1) & (a)(2).
273. The crimes that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group aided and abetted are (1) Mr. Combs’ perpetrating of coercive sex trafficking, in violation of 18 U.S.C. § 1591(a)(1), and (2) Mr. Combs’ co-conspirators knowingly benefitting from coercive sex trafficking, in violation of 18 U.S.C. § 1591(a)(2). These crimes were in and affecting interstate and foreign commerce.
274. Mr. Combs’ co-conspirators benefitted financially and received things of value from their participation in the Combs sex-trafficking venture, including payments and other compensation from Mr. Combs. The co-conspirators who benefitted financially include Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun.
275. Under 18 U.S.C. § 2, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group are punishable as a principal under 18 U.S.C. §§ 1591(a)(1) & (a)(2) and thereby committed and perpetrated violations of Chapter 77, Title 18, U.S. Code, when it aided, abetted, counseled, commanded, induced, and procured Combs’ and his co-conspirators sex-trafficking venture and sex trafficking of Plaintiff Jones, as well as other underaged persons.
276. Under 18 U.S.C. § 2, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group committed and perpetrated crimes in violation of 18 U.S.C. §§ 1591(a)(1) & (a)(2) by aiding, abetting, inducing, and procuring Combs’ and his co-conspirator’s sex-trafficking venture and the sex trafficking of Mr. Jones. As a consequence, Mr. Jones is a victim of Defendants J. Combs, Khorram and her direct

reports: Brendan Paul, Frankie Santella, and Moy Baun's criminally aided, abetted, and inducing Combs' and his co-conspirators' violations of 18 U.S.C. §§ 1591(a)(1) & (a)(2).

277. Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun itself directly committed and perpetrated violations of Chapter 77, Title 18, U.S. Code, including 18 U.S.C. §§ 1591(a)(1) & (a)(2), by aiding, abetting, and inducing the sex-trafficking venture and the sex trafficking of Plaintiff Jones. Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun themselves directly violated Chapter 77 by committing and perpetrating these violations.

278. Among other things, Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun aided, abetted, and induced Combs' and his co-conspirators' sex-trafficking venture and sex trafficking of Plaintiff Jones knowing that Combs and his-conspirators would use means of force, threats of force, fraud, coercion, and a combination of such means to cause Mr. Jones some of whom were under the age of eighteen, to engage in commercial sex acts.

279. By aiding, abetting, and inducing Mr. Combs' and his co-conspirators' sex-trafficking venture and sex trafficking of Plaintiff. Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun benefited, both financially and by receiving things of value, from participating in Combs' sex-trafficking venture.

280. Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun and its employees had actual knowledge that they were aiding, abetting, and inducing Combs' and his co-conspirators' sexual abuse and sex trafficking conspiracy to recruit, solicit, entice, coerce, harbor, transport, obtain, and provide Mr. Jones as well as others, into commercial sex acts, through the means of force, threats of force, fraud, abuse of process, and coercion. Defendants knew, and should have known, that Mr. Combs had engaged in acts in violation of the TVPA.

281. Despite such knowledge, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group intentionally paid for and aided, abetted, and induced Combs' violations of 18 U.S.C. §§ 1591(a)(1) & (a)(2), which constituted perpetrating violations of those laws under 18 U.S.C. § 2. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music

Group knew, and acted in reckless disregard of the fact that, Combs would coerce, defraud, and force Mr. Jones to engage in commercial sex acts.

282. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group's affirmative conduct of aiding, abetting, and inducing Combs' violations was committed knowingly, and in reckless disregard of the facts, that Mr. Combs would use cash and financial support provided by Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group as a means of defrauding, forcing, and coercing sex acts from Mr. Jones. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group's conduct was outrageous and intentional.

283. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group's knowing and intentional conduct of aiding, abetting, and inducing Combs's violations has caused Mr. Jones serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm.

284. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group's knowing and intentional conduct of aiding, abetting, and inducing Combs's violations has caused Mr. Jones harm that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity, in order to avoid incurring that harm.

285. This case does not involve mere fraud. Instead, Defendants' criminal conduct in aiding, abetting, and inducing Combs's violations of the TVPA was outrageous and intentional, because it was in deliberate furtherance of a widespread and dangerous criminal sex trafficking organization. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group's criminal conduct also evinced a high degree of moral turpitude and demonstrated such wanton dishonesty as to imply a criminal indifference to civil obligations. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group's criminal conduct was directed specifically at Mr. Jones, who was the victim of Mr. Combs's sexual abuse and sex trafficking organization.

286. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group’s outrageous and intentional conduct in this case is part of a pattern and practice of Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group profiting by undertaking illegal “high risk, high reward” sponsorships, and partnerships.

287. By virtue of these knowing and intentional violations of 18 U.S.C. §§ 1591(a)(1), 1595, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group is liable to Mr. Jones for the damages he sustained and reasonable attorneys’ fees.

288. By virtue of these intentional and outrageous violations of 18 U.S.C. §§ 1591(a)(1), 1595, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, Universal Music Group is liable to Mr. Jones for punitive damages.

TENTH CAUSE OF ACTION
NIED (FOR SEXUAL ASSAULT)
(against Defendant Jane Doe 1 (Yung Miami’s Cousin))

289. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

290. Jane Doe 1’s conduct created an unreasonable risk of causing emotional distress to Plaintiff, and Jane Doe 1 knew or should have known that such conduct was likely to result in emotional distress that might and/or likely would cause illness or bodily harm.

291. Plaintiff’s emotional distress was foreseeable to Jane Doe 1.

292. As a direct and proximate result of the negligent conduct of Jane Doe 1, Plaintiff suffered and will continue to suffer severe emotional distress.

293. Jane Doe 1’s conduct was wanton, malicious, willful, and/or cruel, entitling the plaintiff to punitive damages.

ELEVENTH CAUSE OF ACTION
NIED (FOR SEXUAL ASSAULT)
(against Mr. Combs)

294. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

295. Mr. Combs' conduct created an unreasonable risk of causing emotional distress to Plaintiff, and Mr. Combs knew or should have known that such conduct was likely to result in emotional distress that might and/or likely would cause illness or bodily harm.

296. Plaintiff's emotional distress was foreseeable to Mr. Combs.

297. As a direct and proximate result of the negligent conduct of Mr. Combs, Plaintiff suffered and will continue to suffer severe emotional distress.

298. Mr. Combs' conduct was wanton, malicious, willful, and/or cruel, entitling the plaintiff to punitive damages.

TWELFTH CAUSE OF ACTION
IIED (FOR SEXUAL ASSAULT)

Defendant Jane Doe 1 (Yung Miami's Cousin)

299. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

300. Jane Doe 1 engaged in conduct toward Plaintiff that is extreme and outrageous to exceed the Bounds of decency in a civilized society, namely by, *inter alia*, subjecting him to sexual assault and misconduct.

301. The sexual assault and misconduct by Jane Doe 1 were extreme and outrageous conduct that shocks the conscience.

302. These actions were taken with the intent to cause or disregard for the substantial probability of causing severe emotional distress.

303. As a direct and proximate result of Jane Doe 1's extreme and outrageous conduct, Plaintiff has suffered severe emotional distress.

304. The Defendant's conduct was wanton, malicious, willful, and/or cruel, entitling the Plaintiff to punitive damages.

THIRTEENTH CAUSE OF ACTION
IIED (FOR SEXUAL ASSAULT)

(against Mr. Combs)

305. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

306. Mr. Combs engaged in conduct toward Plaintiff that is extreme and outrageous to exceed the Bounds of decency in a civilized society, namely by, *inter alia*, subjecting him to sexual assault and misconduct.

307. The sexual assault and misconduct by Mr. Combs were extreme and outrageous conduct that shocks the conscience.

308. These actions were taken with the intent to cause or disregard for the substantial probability of causing severe emotional distress.

309. As a direct and proximate result of Mr. Combs' extreme and outrageous conduct, Plaintiff has suffered severe emotional distress.

310. The Defendant's conduct was wanton, malicious, willful, and/or cruel, entitling the Plaintiff to punitive damages.

FOURTEENTH CAUSE OF ACTION

KNOWING BENEFICIARY IN A SEX-TRAFFICKING VENTURE IN VIOLATION OF THE TRAFFICKING VICTIMS' PROTECTION ACT, 18 U.S.C. §§ 1591(A)(2), 1595 (against Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group)

311. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

312. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knowingly and intentionally benefitted, financially and by receiving things of value, from participating in, assisting, supporting, and facilitating an illegal coercive sex-trafficking venture that was in and affecting interstate and foreign commerce, together and with others, in violation of 18 U.S.C. § 1591(a)(2).

313. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group took many concrete steps to aid and participate in Mr. Combs' sex-trafficking venture. Among the concrete steps that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group took to aid Mr. Combs was providing vast sums of cash, which made the sex-trafficking venture possible. Providing Mr. Combs with large sum of U.S. currency caused Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group to receive financial benefits. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group willingness to provide large amounts of cash to Mr. Combs was the quid pro quo for it receiving financial benefits from Mr. Combs.

314. The cash that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group provided was necessary for Mr. Combs

to coerce Plaintiff Jones to engage in commercial sex acts. The cash directly formed part of the commercial nature of the sex acts. The cash was also a necessary and required part of Mr. Combs' recruitment of Plaintiff Jones, as well as other sex workers, prostitutes and underage minors. By providing cash that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew would be used to fund the sex trafficking venture, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group actively participated in the recruitment of victims of the venture.

315. The cash that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group provided went far beyond providing routine sponsorship, partnership, and employer compensation for a subordinate. It was far from routine for Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group to provide substantial sums of cash per year to Mr. Combs, who did not have an apparent legitimate need for such extravagant sums. The sheer number of "listening parties," yacht parties, and nighttime writers camp after parties which Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group sponsored, went far beyond normal for the music industry. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew or should have known that they were feeding Mr. Combs sexual deviancy. Moreover, the circumstances in which Mr. Combs was requesting such large amounts were far from routine and should have raised numerous "red flags"—taking it well outside routine circumstances.

316. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group providing large sums of cash to Mr. Combs, under the circumstances of this case, was entirely inconsistent with the ordinary duties of a record label, music group, publishing partner or as an employer employee.

317. The reason that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group ignored the numerous red flags about Mr. Combs was to receive financial benefits from Mr. Combs and his sex-trafficking venture. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew that it would gain far-from-routine financial benefits by

ignoring the red flags associated with Mr. Combs and by participating in his sex- trafficking venture.

- a. Among the concrete steps that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group took to aid and participate in the Combs sex-trafficking venture were opening up numerous lines of credit for Mr. Combs's production of the Love Album, his related entities, and associates. By opening these lines of credit, and by consistently sponsoring his freak off parties, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group received many benefits from participating in Mr. Combs's venture. The sponsoring of these events was affirmative conduct that caused Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group to receive those benefits.
- b. Among the concrete steps that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group took to aid the Combs sex- trafficking venture, between about 2000 and continuing through about November 2023, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group concealed its delivery of vast sums of cash (likely millions of dollars) to Mr. Combs and his associates. In order to benefit from the Combs sex- trafficking venture, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group willfully failed to timely file required tax disclosures surrounding the funding of these sex trafficking parties with the federal government, because doing so would imperil its ability to profit from the sex-trafficking venture. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group concealment of the cash transactions caused it to receive financial benefits through continuation of the Combs sex-trafficking venture.
- c. Among the concrete steps that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group took to aid the Combs sex- trafficking venture were its failure to follow AML requirements. This failure was not just passive facilitation, but a deliberate omission by Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group. This omission was specific act of concealment, which allowed Combs to continue funding his sex- trafficking venture through suspicious transactions that would have otherwise been prevented.
- d. By taking the concrete steps outlined above (along with the others alleged in this complaint), Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knowingly participated in sex trafficking and furthered the Combs sex-trafficking venture. The concrete steps above constituted taking part in the sex-trafficking venture and were necessary for its success. The concrete steps above constituted active engagement by Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group in Combs's sex- trafficking venture.
- e. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knowingly and intentionally benefited

financially from, and received value for, its participation in the sex-trafficking venture, in which Mr. Combs, with Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's knowledge, or their reckless disregard of the fact, that Combs would use means of force, threats of force, fraud, coercion, and a combination of such means to cause Plaintiff Jones, as well as others, some of whom were under the age of seventeen, to engage in commercial sex acts.

- f. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew, through years of lawsuits, hush money settlements, and notice that was provided by Ms. Cassie Ventura at the beginning of 2023, that Mr. Combs was engaging in sex trafficking, and that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group was participating in a particular sex-trafficking venture—*i.e.*, the coercive Combs sex-trafficking venture outlined above. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's knowledge went far beyond having an abstract awareness of sex trafficking in general. Indeed, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, were present at Chalice Recording Studios and in Mr. Combs Miami, LA, and NYC homes while he was actively engaging in freak off parties and sex trafficking and the large amounts of cash that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group were giving him. Thus, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group did not simply fail to adequately detect signs of Combs' sex trafficking; it did detect multiple signs of Combs' coercive sex-trafficking venture and continued to participate in the venture. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew that the venture was on-going, which was why Combs required vast sums of cash.
- g. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's actions extend well beyond a situation of failing to train themselves and their staff about recognizing the warning signs of sex trafficking. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's employees did recognize the signs of Combs' sex trafficking. Indeed, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's employees knew about Combs' sex-trafficking venture. But Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group decided to continue facilitating the Combs sex-trafficking venture rather than ending its participation in the venture.
- h. Among the signs that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group was facilitating Combs sex trafficking venture were those facts that came to the attention of Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group from the reporting of Mr. Cassie Ventura mentioned above.
- i. Among the signs that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group was facilitating Combs'

sex trafficking venture were those facts that came to the attention of Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group were those facts that came to its attention through complaints filed by Cassie Ventura of Combs' sex trafficking. Because of those complaints, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group — knew to a certainty that Combs was engaged in sex trafficking.

- j. Defendants Lucian Charles Grainge, Ethiopia Habtemariam's are officers of Defendants Motown Records, Love Records, and Universal Music Group and knew the names of the many of Combs' sex trafficking/ freak off participates (Yung Miami, Daphne Joy, Stevie J, and Jade).
- k. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group helped to conceal the names of Combs' victims from the public and from law enforcement and prosecuting agencies by helping to conceal the existence of the sex-trafficking venture. Among the ways in which Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group helped to conceal the venture's existence was by providing the cash necessary for the venture to avoid leaving a visible "paper trail." Additionally, they employed and empowered Faheem Muhammad, and Defendant Khorram to pay off law enforcement, and to compensate the sex workers with cash.
- l. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's concealment included failing to provide enhanced monitoring that was required for someone like Combs. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group failed to implement an enhanced monitoring of Mr. Combs sexual parties to ensure that underaged girls and sex workers were not present. They failed to do this specifically to help conceal Combs' ongoing sex-trafficking. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew that if it implemented that enhanced monitoring, it would have to stop providing Combs with the cash needed to run his sex-trafficking venture.
- m. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group 's concealment included failing to report Mr. Combs' suspicious sex trafficking activities to law enforcement, and for failing to report their financial support and sponsorship of Mr. Combs sex trafficking parties to the federal government for tax purposes.
- n. In addition to having actual knowledge that it was participating in Combs' sex trafficking venture, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group had constructive knowledge that it was participating in Combs' sex trafficking venture. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group also had constructive knowledge that Plaintiff James, and other underaged minors were being coercively sex trafficked by Combs. Its constructive knowledge extended to the names of Combs' victims, because Combs and his associates knew the names of the victims. Mr. Combs had hundreds of cameras in his homes in LA, NYC, and Miami. Mr. Combs required the sex workers, and

underaged girls to sign NDAs prior entering his parties, and prior to being drugged and sex trafficked at these parties.

- o. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group had constructive knowledge of Combs' sex-trafficking venture because of specific acts by Mr. Combs that put it on notice of a particular and ongoing sex trafficking venture. Among the specific acts were Combs' use of vast sums of cash, drugs, fake promises of career opportunities and access to music industry executives in circumstances that should have prompted Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group employees to specifically raise questions about Combs's sex-trafficking.
- p. Also, among the specific acts giving rise to constructive knowledge were the facts that associates of Mr. Combs made numerous cash withdrawals from Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group accounts through Mr. Combs accountant Robin Greenhill. The circumstances of these withdrawals gave Defendants notice that Mr. Combs' sex-trafficking enterprise was being funded.
- q. Among the financial benefits that the Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group received for participating in and facilitating Combs' sex-trafficking venture were the affiliation and access to Mr. Combs popularity. Mr. Combs was known for throwing the "best" parties. Affiliation with, and or sponsorship of Mr. Combs sex-trafficking parties garnered legitimacy and access to celebrities such as famous athletes, political figures, artist, musicians, and international dignitaries like British Royal, Prince Harry. Mr. Combs and Combs-controlled entities made to Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group profited from their affiliation with Mr. Combs and their sponsorship of his sex-trafficking parties. Mr. Combs and Combs-controlled entities used the sponsorship funds in exchange for Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's facilitation and participation in the sex trafficking venture, including its willingness to provide large amounts of cash in suspicious circumstances and to allow their failure to report these sponsorships on their taxes to the US Federal Government to avoid triggering suspicions of the Federal Government.
- r. Among the financial benefits that Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group received for participating in Combs' sex-trafficking venture was referral of business opportunities from Mr. Combs and his co-conspirators. Access to up-and-coming artist, producers, song writers and creatives. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group profited from these referred business opportunities. Mr. Combs referred business entities and business opportunities to Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group in exchange for its facilitation and participation in the sex trafficking venture. These referrals were a quid pro quo for Defendants Lucian Charles Grainge, Ethiopia

- Habtemariam, Motown Records, Love Records, and Universal Music Group's participation in the sex-trafficking venture.
- s. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group financially profited from the deposits made by Combs and Combs-controlled entities and from the business opportunities referred to Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group by Combs in exchange for its facilitation and participation in Combs' sex trafficking venture.
 - t. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knowingly received financial benefits in return for its assistance, support, and facilitation of Combs' sex-trafficking venture. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew that if it stopped assisting, supporting, and facilitating of Combs' sex-trafficking venture, it would no longer receive those benefits.
 - u. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew, and was in reckless disregard of the fact, that it was Combs's pattern and practice to use the channels and instrumentalities of interstate and foreign commerce (private jets, yachts, and commercial airplanes) to entice, recruit, solicit, harbor, provide, obtain, and transport young women, young men, and underage girls for purposes of causing commercial sex acts, in violation of 18 U.S.C. § 1591(a)(1).
 - v. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group and its employees had actual knowledge that they were facilitating Combs' sexual abuse and sex trafficking conspiracy to recruit, solicit, entice, coerce, harbor, transport, obtain and provide Mr. Jones into commercial sex acts, through the means of force, threats of force, fraud, abuse of process, and coercion, and a combination of all these means.
 - w. Despite such knowledge, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group intentionally paid for, facilitated, and participated in Combs' violations of 18 U.S.C. § 1591(a)(1), which Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew, and were in reckless disregard of the fact that, Combs would coerce, defraud, and force Mr. Jones to engage in commercial sex acts.
 - x. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group, through its employees and agents, actively participated in the sex trafficking conspiracy and led Mr. Jones, sex workers, and underage girls to believe that they would be rewarded if they cooperated and acquiesced to Mr. Combs' coercive demands.
 - y. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's affirmative conduct was committed knowingly, and in reckless disregard of the facts, that Mr. Combs would use cash and financial support provided by Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group as a means of defrauding, forcing, and coercing sex acts from Mr. Jones. Defendants

Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's conduct was outrageous and intentional.

- z. In addition to actual knowledge that it was participating in and facilitating the Combs sex-trafficking venture, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group also should have known that it was participating in and facilitating a venture that had engaged in coercive sex trafficking, as covered by 18 U.S.C. § 1595(a).
 - aa. In exchange for facilitating and covering up Combs' commercial sex trafficking, the Defendants Lucian Charles Grainge, Ethiopia Habtemariam advanced in their careers at Defendants Motown Records, Love Records, and Universal Music Group and received financial benefits therefrom by securing the Defendants Motown Records, Love Records, and Universal Music Group – Sean Combs relationship.
 - bb. Facilitating and covering up Combs' sexual trafficking and misconduct was a means of obtaining economic success and promotion within the Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group hierarchy.
 - cc. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's knowing, and intentional conduct has caused Mr. Jones serious harm including, without limitation, physical, psychological, emotional, financial, and reputational harm.
 - dd. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's knowing, and intentional conduct has caused Mr. Jones harm that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity, to avoid incurring that harm.
 - ee. This case does not involve mere fraud. Instead, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's criminal conduct in violating the TVPA was outrageous and intentional because it was in deliberate furtherance of a widespread and dangerous criminal sex trafficking organization. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's criminal conduct also evinced a high degree of moral turpitude and demonstrated such wanton dishonesty as to imply a criminal indifference to civil obligations. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's criminal conduct was directed specifically at Mr. Jones who was the victim of Combs' sexual abuse and sex trafficking organization.
 - ff. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's outrageous and intentional conduct in this case is part of a pattern and practice of Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group profiting by undertaking illegal "high risk, high reward" partnerships and sponsorships.
318. By virtue of these knowing and intentional violations of 18 U.S.C. §§ 1591(a)(2), 1595, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records,

and Universal Music Group is liable to Mr. Jones for the damages he sustained and reasonable attorneys' fees.

FIFTEENTH CAUSE OF ACTION
OBSTRUCTION OF THE ENFORCEMENT OF THE TRAFFICKING VICTIM
PROTECTION ACT, 18 U.S.C. § 1591(d)
(against, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records,
Love Records, and Universal Music Group)

319. Mr. Jones incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

320. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group and its officers and employees knowingly and intentionally obstructed, attempted to obstruct, interfered with, and prevented the enforcement of 18 U.S.C. §§ 1591(a)(1) & (a)(2), all in violation of 18 U.S.C. § 1591(d). This activity is hereinafter referred to collectively simply as “obstruction.”

321. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction of the enforcement of 18 U.S.C. §§ 1591(a)(1) and (a)(2) was forbidden by 18 U.S.C. § 1591(d), and Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group thereby violated Chapter 77, Title 18. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction described here and in the preceding paragraph directly, proximately, and foreseeably harmed Mr. Jones by directly resulting in him coercively being caused to engage in commercial sex acts and in other ways.

322. Defendant Sean Combs has a well-documented history of criminal investigations. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group were on notice of Mr. Combs proclivity to criminal activity. They knew or should have known that Mr. Combs sex-trafficking operation would or could result in a criminal investigation by State and Federal prosecutors for violating (among other laws) the TVPA. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group should have taken a cue from the Federal Prosecutors arrest and prosecution of Jeffrey Epstein on or about July 8, 2019. On or about that date, the U.S. Attorney's Office for the Southern District of New York indicted Epstein

(and unnamed “associates”) for violating the TVPA. Later, on about June 29, 2020, the same Office indicted Epstein’s co-conspirator, Ghislaine Maxwell, for conspiracy to entice minor victims to travel to be abused by Epstein. Mr. Combs, Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun all engaged in the same activities as Mr. Epstein and Ms. Maxwell. In fact, Mr. Combs, Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun may have done worse.

323. By providing financing for Mr. Combs’ sex trafficking organization, and concealing its actions thereafter, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group obstructed, interfered with, and prevented the state and federal government enforcement of the TVPA against Mr. Combs, Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun. To the extent that the federal government was able to ultimately charge Mr. Combs, Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun with TVPA violations, the filing of those charges was delayed by Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group’s actions. Because of that delay, Mr. Jones was coercively caused to engage in commercial sex acts.

324. As one example of how Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group obstructed, attempted to obstruct, interfered with, and prevented state and federal government’s enforcement of the TVPA, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group provided large amounts of cash to Mr. Combs and his associates so that the coercive commercial sex acts would escape the detection of state and federal law enforcement and prosecuting agencies. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group provided large amounts of cash to further the Mr. Combs, Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun sex-trafficking venture and with the purpose of helping Mr. Combs, Defendants J. Combs, Khorram and her direct reports: Brendan Paul, Frankie Santella, and Moy Baun evade criminal liability for violating the TVPA.

325. As an example of how Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group obstructed, attempted to obstruct, interfered with, and prevented state and federal government's enforcement of the TVPA, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group failed to timely file with the state and federal government the required tax forms that detailed the sponsorship and partnership payments provided by defendants to Mr. Combs. Timely filing of these reports is required by the United States Tax code and related laws and regulations. These reports are tools that the state and federal government uses to detect and prosecute, among other illegal activities, sex trafficking in violation of the TVPA. By failing to timely file, the required tax reporting documents regarding Mr. Combs' sponsorship cash transactions, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group obstructed, attempted to obstruct, interfered with, and prevented the government's enforcement of the TVPA by concealing from the government's attention Mr. Combs' cash transaction in aid of sex trafficking.

326. By providing large amounts of cash to Mr. Combs and his associates, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group intended and knew that Mr. Combs' coercive commercial sex acts would escape the detection of law enforcement and prosecuting agencies for some period of time. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group provided large amounts of cash to further the Combs sex-trafficking venture and with the purpose of helping Mr. Combs evade criminal liability for violating the TVPA.

327. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction, attempted obstruction, interference with, and prevention of the enforcement of the TVPA were all done intentionally and knowingly. For example, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew that Mr. Combs was high risk—specifically, high risk to violate the TVPA through continuing criminal sex trafficking activities. As evidenced by Cassie Ventura's civil complaint, she informed members of Mr. Combs parent

label about the abuses he was visiting upon her, and instead of coming to her rescue, they forced her to return his calls and to return to his sex trafficking enterprise.

328. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group was aware Mr. Combs had a laundry list of criminal charges, and barely escaped serving prison time. Upon information and belief Mr. Combs engaged in witness intimidation, and bribery to escape criminal liability for shooting Natania Reuben in the face. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group was aware that there were public allegations that Mr. Combs illegal conduct was facilitated by several named co- conspirators. They were made aware of this through complaints made by Cassie Ventura, and the lawsuit by former Diddy sex worker Jonathan Oddi. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group concealed from state and federal government its numerous cash payments to those co-conspirators. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group continued its affirmative conduct of providing cash to Mr. Combs, and his associates so that he could make those cash payments to his co- conspirators with knowledge that such cash transaction did not produce a clear paper trail. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's intentional conduct obstructed, attempted to obstruct, in many ways interfered with, and prevented the enforcement of the TVPA by investigators and prosecuting agencies.

329. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's relationship with Mr. Combs in providing to his sex-trafficking venture with vast sums of cash each year went far beyond a normal (and lawful) sponsorship, partnership, and employer employee relationships. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew, and intended, that its relationship with Mr. Combs would go far beyond a normal music industry relationship. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew that its decision to go beyond a normal music relationship with Mr. Combs obstructed the ability of law enforcement and prosecuting agencies to enforce the TVPA.

330. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction of the government's TVPA and other law enforcement efforts was intentional and willful and, therefore, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group intentionally and willfully caused Mr. Combs' commission of the forcible commercial sex acts with Mr. Jones through its obstruction supporting the concealment of Mr. Combs' sex-trafficking venture. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew that Mr. Combs and his other co-conspirators would use means of force, threats of force fraud, coercion, and a combination of such means to cause Mr. Jones to engage in commercial sex acts.

331. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group knew, acted in reckless disregard of the fact, and should have known, that its obstruction in violation of 18 U.S.C. § 1591(d) would directly and proximately lead to unlawful coercive commercial sex acts by Mr. Combs with men, like Plaintiff Jones, young men, women and young girls.

332. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction has caused Mr. Jones serious harm, including, without limitation, physical, psychological, financial, and reputational harm. That harm was directly and proximately caused by the obstruction and the harm resulting from obstruction was foreseeable.

333. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction has caused Mr. Jones harm that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity to avoid incurring that harm.

334. This case does not involve mere fraud. Instead, Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's criminal conduct in obstructing enforcement of the TVPA was outrageous and intentional because it was in deliberate furtherance of a widespread and dangerous criminal sex trafficking organization. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction also evinced a

high degree of moral turpitude and demonstrated such wanton dishonesty as to imply a criminal indifference to civil obligations. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group's obstruction was directed specifically at Mr. Jones who was the victim of Mr. Combs' sex trafficking organization.

335. By virtue of these violations of 18 U.S.C. § 1591(d), Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group is liable to Mr. Jones for the damages he sustained and reasonable attorneys' fees by operation of 18 U.S.C. § 1595. Defendants Lucian Charles Grainge, Ethiopia Habtemariam, Motown Records, Love Records, and Universal Music Group perpetrated an obstruction of the TVPA, and therefore perpetrated a violation of Chapter 77, Title 18.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in her favor and against Defendants, containing the following relief:

- a. A declaratory judgment that the actions, conduct, and practices of Defendants complained of herein violate the laws of the State of New York;
- b. An award of damages against Defendant, in an amount to be determined at Trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or economic damages, including, but not limited to, loss of past and future income, wages, compensation, seniority, and other benefits of employment;
- c. An award of damages against Defendant, in an amount to be determined at Trial, plus prejudgment interest, to compensate Plaintiff for all non-monetary and/or compensatory damages, including, but not limited to, compensation for her mental anguish, humiliation, embarrassment, stress and anxiety, emotional pain and suffering, and emotional distress;
- d. An award of punitive damages, in an amount to be determined at Trial;
- e. Prejudgment interest on all amounts due;
- f. An award of costs that Plaintiff has incurred in this action, including, but not limited to, expert witness fees, as well as Plaintiff's reasonable attorneys' fees and costs to the fullest extent permitted by law; and,
- g. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: February 26, 2024
Brooklyn, New York

T. A. BLACKBURN LAW, PLLC.
By: *Tyrone A. Blackburn, Esq.*
Tyrone A. Blackburn, Esq.

PRESERVATION NOTICE

The term "you," "your," or "yours" as used herein shall refer to you (the recipient of this letter), as well as to the respondents and any individuals responsible for the custody and control of the below information, including, but not limited to, those individuals' administrative assistants, secretaries, agents, employees, information technology personnel and third-party vendors. From this point forward, you are directed to prevent "spoliation," defined as altering, changing, updating, destroying (even if periodically), editing, or deleting any information set forth hereafter.

If you cause any such alteration, destruction, or change, direct it, or allow it to occur, you may be charged with discovery rule violations for which sanctions may be imposed. Further, your failure to abide by this request could result in severe penalties against you and form the basis of legal claims for spoliation.

Electronically Stored Information:

In terms of electronically stored information, you are directed to prevent any destructive, alternative or other change to any web pages, virtual profiles or identical (including, but not limited to, Facebook, Instagram, Pinterest, Twitter, Tumblr, LinkedIn, Snapchat, Google Plus+, Flickr, Vine, About.me, ask.fm etc., or any other social media-based web profile or networking site account), emails, voice messages, text messages, instant messages or messaging systems, recordings, digital recordings, media images and videos, temporary memory, memory sticks, portable memory devices, laptops or computers, CDs, DVDs, USB devices, databases, computer activity logs, internet browsing history (including cookies), network access and server activity logs, word processing files and file fragments, backup and archival files, imaging and facsimile files, electronic calendar and scheduling program files and file fragments as well as any other contact and relationship management data (e.g., Outlook), electronic spreadsheet files and file fragments, pertaining in any way to this controversy of the parties or any potential witnesses. This includes a request that such information not be modified, altered, or deleted due to data compression or disk fragmentation (or other optimization procedures), which processes you are hereby directed to suspend until that data can be preserved, copied, and produced.

You are directed not to modify, alter, or delete or allow modifications, alterations, or deletions to be made to any electronically stored information. You are further directed to preserve all, and not to destroy any, passwords, decryption productions (including, if necessary, the software to decrypt the files), network access codes, manuals, tutorials, written instructions, decompression or reconstruction software, and any other information and things necessary to access, view and (if necessary) reconstruct the electronic data we will request through discovery.

Paper Information:

Regarding the paper information, you are directed to preserve any emails, videos, texts, memos, reports, documents, notes, correspondence, photographs, investigative information, or other documents about the controversy, parties, or witnesses. We expect to obtain several documents and other data from you through discovery, including text messages, emails, photographs, and other information stored on computers, electronic devices, and telephones.

Although we may bring a motion with a court for order-preserving documents and other data from destruction or alteration, your obligation to preserve documents and other data for discovery, in this case, arises independently from any order on such motion. Electronic documents and the

storage media, including but not limited to telephones on which they reside, contain relevant, discoverable information beyond what may be found in printed documents. Therefore, even where a paper copy exists, we will likely seek all documents in their original, electronic form, along with metadata or information about those documents on the media. We will seek paper printouts of only those documents that contain unique information created after they were printed (e.g., paper documents containing handwriting, signatures, marginalia, drawings, annotations, highlighting, and redactions) and any paper documents for which no corresponding electronic files exist.

The laws and rules prohibiting the destruction of evidence apply to electronically stored information in the same manner they apply to other evidence. Due to its format, electronic information is quickly deleted, modified, or corrupted. Accordingly, the demand is made that you take every reasonable step to preserve this information until the final resolution of this matter. This may include, but would not be limited to, an obligation to discontinue all data destruction and backup tape recycling policies.

Concerning electronic data created after this Complaint's delivery date, relevant evidence should not be destroyed. You must take the steps necessary to avoid the destruction of such evidence.

Dated: February 26, 2024
Brooklyn, New York

T. A. BLACKBURN LAW, PLLC.
By: *Tyrone A. Blackburn, Esq.*
Tyrone A. Blackburn, Esq.

DEMAND FOR INSURANCE COVERAGE

Defendants are demanded to provide a complete copy of their applicable insurance policies and declaration sheets demonstrating coverage within thirty (30) days of service of this Complaint.

Dated: February 26, 2024
Brooklyn, New York

T. A. BLACKBURN LAW, PLLC.
By: *Tyrone A. Blackburn, Esq.*
Tyrone A. Blackburn, Esq.



June 27, 2023

DOJ OIG Releases Report on the BOP's Custody, Care, and Supervision of Jeffrey Epstein at the Metropolitan Correctional Center in New York, New York

Department of Justice (DOJ) Inspector General Michael E. Horowitz announced today the release of a report of investigation regarding the Federal Bureau of Prison's (BOP) custody, care, and supervision of Jeffrey Epstein while detained at the Metropolitan Correctional Center in New York, New York (MCC New York). Epstein died by suicide on August 10, 2019 while in BOP custody. The focus of DOJ Office of the Inspector General's (OIG) investigation was the conduct of BOP personnel.

The DOJ OIG investigation and review identified:

- **Numerous and Serious Failures by MCC New York Staff.** The DOJ OIG found numerous and serious failures by MCC New York staff constituting misconduct and dereliction of their duties. Among other things, these failures resulted in Epstein being unmonitored and alone in his cell with an excessive amount of bed linens, from approximately 10:40 p.m. on August 9 until he was discovered hanged in his locked cell on August 10 at approximately 6:30 a.m.
 - ***MCC New York Staff Failed to Ensure that Epstein Was Assigned a Cellmate.*** Following a July 23, 2019, incident that resulted in Epstein being placed on suicide watch, the MCC New York Psychology Department determined that Epstein needed to be housed with an appropriate cellmate. On August 9, Epstein's cellmate was transferred out of MCC New York. MCC New York staff knew that Epstein did not have a cellmate but did not take steps to ensure that he was assigned a new cellmate.
 - ***MCC New York Staff Failed to Undertake Required Measures Designed to Ensure that Epstein and Other Inmates Were Accounted for and Safe.*** BOP policy requires Special Housing Unit (SHU) staff to observe all inmates, conduct rounds, conduct inmate counts, search inmate cells, and ensure adequate supervision of the SHU. BOP staff in the SHU in the hours before Epstein's death failed to carry out these responsibilities. Specifically, only one SHU cell search was documented on August 9, and it was not of Epstein's cell. BOP records did not indicate when Epstein's cell was last searched. Had Epstein's cell been searched as required, the search would have revealed that Epstein had excess prison blankets, linens, and clothing in his cell. The OIG also found that SHU staff did not conduct any 30-minute rounds after about 10:40 p.m. on August 9 and that none of the required SHU inmate counts were conducted after 4:00 p.m. on August 9. MCC New York staff falsified count slips and round sheets to show that they had been performed when they were not, leaving Epstein unobserved for hours before his death. Following a DOJ OIG investigation, two MCC New York employees were charged criminally with falsifying BOP records. The charges were dismissed upon compliance by the employees with the terms of deferred prosecution agreements they entered into with the U.S. Attorney's Office for the Southern District of New York. That office declined prosecution for

other MCC New York employees who the OIG found created false documentation on earlier dates and times not proximate to the Epstein's death.

- ***MCC New York Staff Failed to Ensure that the Institution's Security Camera System was Fully Functional Resulting in Limited Recorded Video Evidence.*** BOP policy also requires SHU staff to ensure the functionality of the video camera surveillance system. This investigation and review revealed longstanding deficiencies with MCC New York's security camera system. Although video cameras in the SHU provided live video feeds to monitoring stations, system deficiencies resulted in nearly all of the cameras in and around the SHU where Epstein was being housed to not record video starting in late July 2019 and continuing through the date of Epstein's death.
- **Long-standing Operational Challenges.** The DOJ OIG has repeatedly identified long-standing operational challenges that negatively affect the BOP's ability to operate its institutions safely and securely. Many of those same operational challenges, including staffing shortages, managing inmates at risk for suicide, maintaining functional security camera systems, management failures, and widespread disregard of BOP policies and procedures, were again identified by the OIG during this investigation and review of the custody, care, and supervision of Epstein, one of the BOP's most high profile inmates.
- **No Evidence Contradicting the FBI's Determination that there Was No Criminality Associated with Epstein's Death.** Separate from the OIG's investigation, which focused on the conduct of BOP personnel, the FBI concurrently investigated whether Epstein's death was the result of criminal conduct by any non-BOP actors. Among other things, the FBI investigated the cause of Epstein's death and determined it was not the result of a criminal act. The Office of the Chief Medical Examiner, City of New York, determined that Epstein died by suicide. While the OIG determined MCC New York staff engaged in significant misconduct and dereliction of their duties, we did not uncover evidence contradicting the FBI's determination regarding the absence of criminality in connection with Epstein's death.

The combination of negligence, misconduct, and outright job performance failures documented in the report all contributed to an environment in which arguably one of the most notorious inmates in BOP's custody was provided with the opportunity to take his own life. The BOP's failures are troubling not only because the BOP did not adequately safeguard an individual in its custody, but also because they led to questions about the circumstances surrounding Epstein's death and effectively deprived Epstein's numerous victims of the opportunity to seek justice through the criminal justice process. The fact that these failures have been recurring ones at the BOP does not excuse them and gives additional urgency to the need for DOJ and BOP leadership to address the chronic problems plaguing the BOP.

The DOJ OIG made eight recommendations to improve the BOP's management of its correctional institutions. The BOP agreed with all recommendations.

Report: Today's report and an interactive timeline of events can be found on the OIG's website at the following link: <https://oig.justice.gov/reports/investigation-and-review-federal-bureau-prisons-custody-care-and-supervision-jeffrey>

Video: To accompany today's report, the OIG has released a 3-minute video of the Inspector General discussing the report's findings. The video and a downloadable transcript are available at the following link: <https://oig.justice.gov/news/multimedia/video/message-inspector-general-investigation-and-review-bops-custody-care-and>

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAWN ANGELIQUE RICHARD,

Plaintiff,

v.

SEAN COMBS, HARVE PIERRE, REMOTE PRODUCTIONS INC, NEW REMOTE PRODUCTIONS INC, THE NORDLINGER GROUP LLC, NOVEMBER 15 LLC, DADDY’S HOUSE RECORDING STUDIO, BAD BOY ENTERTAINMENT LLC, BAD BOY RECORDS LLC, BAD BOY ENTERTAINMENT HOLDINGS INC, BAD BOY PRODUCTIONS HOLDINGS INC, BAD BOY BOOKS HOLDINGS INC, THE SEAN COMB MUSIC INC, SEAN COMBS CAPITAL LLC, COMBS ENTERPRISES, LLC, UNIVERSAL MUSIC GROUP NV, INTERSCOPE GEFLEN A&M RECORDS, DIAGEO AMERICAS SUPPLY INC D/B/A CIROC DISTILLING COMPANY D/B/A CIROC CANNING CO, COMBS WINES AND SPIRITS LLC, JANICE COMBS PUBLISHING INC, JANICE COMBS PUBLISHING HOLDINGS INC, SONY SONGS, a division of SONY MUSIC PUBLISHING LLC, LOVE RECORDS INC, EPIC RECORDS, DOE CORPORATIONS 1-10, AND DOE DEFENDANTS 11-20,

Defendants.

CIVIL CASE NO. cv-24-6848

COMPLAINT

JURY TRIAL DEMAND

Plaintiff Dawn Angelique Richard (“Ms. Richard”), by and through her attorneys, The Bloom Firm and IP Legal Studio LLC, brings this action against Defendants. Ms. Richard alleges upon knowledge concerning her own experience and upon information and belief as to all other matters.

PRELIMINARY STATEMENT

1. Dawn Angelique Richard, known professionally as Dawn Richard, is an American musician, singer, songwriter, and performer. She gained widespread recognition as a member of

the girl group *Danity Kane*, formed by Defendant Sean Combs (“Mr. Combs”), and later transitioned into a key member of Mr. Combs’ band *Diddy – Dirty Money*.

2. Defendant Sean Combs, a once-celebrated hip-hop mogul popularly known by his stage names Puff Daddy, Puffy, P. Diddy, Diddy, or Love, skyrocketed to fame in the late 1990s and became a powerful and enduring figure in the music and entertainment industry. In 1998, Mr. Combs explained the origins of his stage name in a *USA Today* interview: his nickname was “**Puff**” because he had a “**temper**” and was known to “**huff and puff**” when he was angry.

3. Over the decades following his rise to fame, Mr. Combs’ star-studded, larger-than-life persona overshadowed his vicious temper and pervasive acts of violence directed towards those in his inner circle – specifically, women.

4. Mr. Combs’ namesake temper frequently manifested in physical violence. Mr. Combs regularly hurled objects in fits of rage, often throwing items such as mobile phones, laptops, food, and studio equipment across the room or at people. On numerous occasions, Ms. Richard witnessed Mr. Combs brutally beat his girlfriend, Ms. Casandra (“Cassie”) Ventura (“Ms. Ventura”). His persistent abuse included choking and strangling Ms. Ventura, striking her with his hands and with objects, slapping her, punching her, and throwing items at her, including a scalding hot pan.

5. On many occasions, Ms. Richard tried to intervene, offering Ms. Ventura support and encouragement to leave Mr. Combs. Each time, Mr. Combs learned of her efforts to help Ms. Ventura and became enraged, threatening Ms. Richard’s life with statements such as “**you want to die today,**” “**I make n***** go missing**” and “**I end people.**”

6. Compounding Mr. Combs’ violent acts and death threats, he flagrantly exploited Ms. Richard’s musical talent as a singer and writer while withholding her rightful earnings, stealing her copyrighted works, and subjecting her to years of inhumane working conditions which included groping, assault, and false imprisonment, among other violations.

7. For nearly a decade, Mr. Combs manipulated Ms. Richard with mantras that submission to his depraved demands was necessary for career advancement, instilling in her the belief that such abuse and exploitation were required for female artists to succeed in the music industry. It was not until Ms. Ventura's bravery in coming forward that Ms. Richard realized her own personal suffering was tied to the many years of abuse by Mr. Combs that had become normalized for her.

8. As more women courageously come forward, Plaintiff has been empowered by this collective strength and now adds her voice to the growing chorus of victims bravely sharing their harrowing stories. Together, they seek justice and stand in solidarity, as the latest victims of the #Me Too movement in the music industry.

PARTIES

9. Ms. Dawn Angelique Richard is a resident of the State of California and was employed by Defendants Remote Productions Inc., New Remote Productions Inc., Bad Boy Entertainment LLC, Bad Boy Records LLC, Bad Boy Entertainment Holdings LLC, Bad Boy Productions Holdings Inc., Bad Boy Books Holdings Inc., The Sean Combs Music Inc., Sean Combs Capital LLC, and Combs Enterprises LLC (hereinafter collectively "Bad Boy Records") from 2005 until 2012. At all relevant times herein, Ms. Richard met the definition of an "employee" of Defendant Bad Boy Records and related entities. At all relevant times herein, Ms. Richard was a resident of the State of New York.

10. Defendant Sean Combs, upon information and belief, resides within the State of California. At all relevant times herein, Mr. Combs met the definition of an "employer" of Ms. Richard under all relevant statutes.

11. Defendant Harve Pierre ("Mr. Pierre"), upon information and belief, resides within the state of New Jersey. At all times relevant herein, Defendant Harve Pierre was the president of

Bad Boy Entertainment and Bad Boy Records in New York and met the definition of an “employer” of Ms. Richard under all relevant statutes.

12. Defendants Remote Productions Inc. (“RPI”) and New Remote Productions Inc. (“NRPI”) are Delaware corporations and television production companies, which upon information and belief, were created by Mr. Combs to produce *Making The Band* in New York and in California. At all relevant times herein, RPI and NRPI employed Ms. Richard under all relevant statutes.

13. Defendant The Nordlinger Group LLC is a finance firm with its principal place of business in New York, and on information and belief, is/was employed by other named defendants herein to pay and account to Ms. Richard pursuant to her employment with other named defendants. On information and belief, The Nordlinger Group LLC formed November 15 LLC for purposes of disbursing funds relative to *Making The Band*.

14. Upon information and belief, Defendant Daddy’s House Recording Studio Inc. is a New York corporation and a music recording studio owned by Defendant Bad Boy Records, in New York. At all relevant times herein, Ms. Richard was an employee required to work at said studio.

15. Defendant Bad Boy Entertainment LLC is a music, media, and entertainment company founded by Defendant Sean Combs, which includes the record label Defendant Bad Boy Records LLC. Defendant Bad Boy Entertainment LLC is a Delaware limited liability company and successor-in-interest to RPI. At all relevant times herein, Bad Boy Entertainment LLC met the definition of an “employer” of Ms. Richard under all relevant statutes.

16. Defendant Bad Boy Entertainment Inc. is a Florida corporation. At all relevant times herein, Bad Boy Entertainment Inc. met the definition of an “employer” of Ms. Richard under all relevant statutes.

17. Defendant Bad Boy Entertainment Holdings Inc. is a New York corporation. Upon information and belief, Defendant Bad Boy Entertainment Holdings Inc. is a successor-in-interest to Defendants Bad Boy Entertainment LLC, Bad Boy Records LLC, and Bad Boy Entertainment Inc. as alleged herein.

18. Defendant Bad Boy Productions Holdings Inc. is a New York corporation. Upon information and belief, Defendant Bad Boy Production Holdings Inc. is a successor-in-interest to other “Bad Boy” Defendants as alleged herein.

19. Defendant Bad Boy Books Holdings Inc. is a New York corporation. Upon information and belief, Defendant Bad Boy Books Holdings Inc. is a successor-in-interest to other “Bad Boy” Defendants as alleged herein.

20. Defendant The Sean Comb Music Inc. is a company under which Ms. Richard was employed by Defendant Sean Combs. Upon information and belief, The Sean Comb Music Inc. is a part or successor to other “Bad Boy” company Defendants as alleged herein.

21. Defendants Sean Combs Capital LLC and Combs Enterprises LLC are New York limited liability companies, which upon information and belief are successor-in-interest companies to Defendant The Sean Comb Music, Inc.

22. Defendant Universal Music Group N.V. (“UMG”) is a Dutch–American multinational music corporation. UMG’s corporate headquarters are located in Hilversum, Netherlands and its operational headquarters are located in Santa Monica, California. Defendant Interscope Geffen A&M Records are subsidiaries of UMG, with operational headquarters in California. At all relevant times herein, UMG and subsidiaries Interscope Geffen A&M Records financially benefited from, condoned and enabled Defendant Combs’ misconduct as defined under all relevant statutes.

23. Defendant Diageo Americas Supply Inc. was a New York corporation, and upon information and belief, currently is a Kentucky and/or an Illinois corporation, doing business as

Ciroc Distilling Company in New York. Ms. Richard conferred a benefit on these Defendants pursuant to the direction of Defendant Combs.

24. Defendant Combs Wines and Spirits LLC is a New York limited liability company, which upon information and belief, is Defendant Combs' holding company for sponsorships by Defendant Diageo Americas Supply Inc. d/b/a Ciroc Distilling Company. At all relevant times, Ms. Richard was employed by Defendant Combs Wines and Spirits LLC under all relevant statutes.

25. Defendant Janice Combs Publishing Inc. is a music publishing administrator and a New York corporation, who at all relevant times, held or holds the publishing copyrights of Ms. Richard pursuant to her employment with other defendants herein under all relevant statutes.

26. Defendant Janice Combs Publishing Holdings Inc. is a music publishing administrator, a New York corporation, and a successor in interest to Janice Combs Publishing Inc., who at all relevant times, held or holds the publishing copyrights of Ms. Richard pursuant to her employment with other defendants herein under all relevant statutes.

27. Defendant Sony Songs, a division of Sony Music Publishing LLC, is a New York limited liability company who is the assignee of Ms. Richard's publishing copyrights from Defendants Janice Combs Publishing Inc. and Janice Combs Publishing Holdings Inc.

28. Defendant Love Records Inc. is a music record label owned and/or, upon information and belief, controlled by Defendant Sean Combs, with its principal place of business in California. Ms. Richard conferred a benefit on this Defendant pursuant to the direction of Defendant Combs.

29. Defendant Epic Records, a record label currently managing other defendants' companies, interests and music, is a subsidiary of Sony Music Entertainment, with its principal place of business in New York. Ms. Richard conferred a benefit on these Defendants pursuant to the direction of Defendant Combs.

JURISDICTION AND VENUE

30. This Court has jurisdiction pursuant to 28 U.S.C. §§1331 and 1343, as this action asserts violations of 18 U.S.C. § 1591 *et seq.*, 18 U.S.C. § 1589 *et seq.*, and 17 U.S.C. § 106 *et seq.*, and therefore raises federal questions regarding the deprivation of Ms. Richard's rights. The Court has supplemental jurisdiction over Ms. Richard's related claims arising under state and city law pursuant to 28 U.S.C. § 1367(a).

31. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to this action occurred in this District, and Defendants Sean Combs and Bad Boy Records conduct substantial business and/or are domiciled in this District.

FACTUAL ALLEGATIONS

I. Ms. Richard is selected to be in Mr. Combs' all-female musical group *Danity Kane* after competing on MTV's *Making The Band*

32. In or around 2004, Ms. Richard was selected to participate in Season 3 of MTV Networks' reality television show, *Making The Band*. The show centered around the formation and development of a new musical group under the mentorship of Mr. Combs. The contestants would compete and be chosen by Mr. Combs to form a band, which would go on to create albums and perform.

33. For aspiring artists like Ms. Richard, *Making The Band* represented a concrete path to a career in the entertainment industry. Ms. Richard appeared in Seasons 3 and 4 of *Making The Band*, which first aired in 2005,¹ and in Season 5 of *Making His Band*, which aired in 2009.²

¹ *Making The Band* is a reality television series that premiered on MTV in 2000. The show has had several iterations, each featuring a different musical group. The stars of Season 3 and 4 were Aubrey O'Day, Wanita "D. Woods" Woodgett, Shannon Bex, Aundrea Fimbres, and Ms. Richard, known as the all-female group *Danity Kane*.

² Season 5 of *Making The Band* featured *Diddy – Dirty Money*, a trio consisting of Mr. Combs, Kalenna Harper, and Ms. Richard.

34. Out of thousands of contestants, Ms. Richard along with approximately twelve other women were selected to participate in Season 3 of *Making The Band*. Five women, including Ms. Richard, were ultimately chosen to be in the group, *Danity Kane*, which was named by Ms. Richard.

35. Prior to and including the first *Danity Kane* album, *Making The Band* was filmed entirely at Daddy's House Recording Studio at 3120 W. 44th Street, New York, New York. The *Making The Band* content that focused on *Danity Kane*'s work on its second album, *Welcome to the Dollhouse*, was filmed at Daddy's House and at Mr. Combs' Miami residence. Other *Making The Band* episodes included Los Angeles as a third filming location.

36. Upon information and belief, to create *Making The Band*, camera crews filmed 24 hours a day, gathering months' worth of footage to condense into mere hours of entertainment for viewers.

37. *Danity Kane* released its self-titled debut album in August 2006 and its second album *Welcome to the Dollhouse* in March 2008.

38. *Danity Kane*'s first album sold over 4,000,000 copies; damages to Ms. Richard for unpaid salaries are estimated at \$1,000,000.00; *Danity Kane*'s second album *Welcome to the Dollhouse* sold over 2,000,000 copies; damages to Ms. Richard for unpaid salaries and royalties are estimated at \$500,000.00. Damages on unpaid wages for touring on over 100 dates for Ms. Richard with *Danity Kane* are estimated at \$1,800,000.00.

39. Mr. Combs fired bandmate Aubrey O'Day and Wanita "D. Woods" Woodgett from *Danity Kane* on live television at the height of its fame in 2008; which resulted in *Danity Kane* being disbanded in 2009.

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II. Ms. Richard first encounters Mr. Combs' aggressive, intimidating behavior and animus toward women

40. During the auditions and on the set of *Making The Band*, Mr. Combs projected an aura of superiority, wealth, and power. Mr. Combs regularly wore sunglasses and avoided looking the female contestants in the eyes, contributing to an atmosphere of uncertainty and intimidation.

41. During auditions, Mr. Combs spoke to the female contestants in a hostile, condescending manner, making disparaging gender-based remarks such as calling them “fat,” “ugly,” “bitches,” and “hoes.” Ms. Richard felt threatened and intimidated by Mr. Combs’ blatant disdain for the young women, like herself, who were excited for the opportunity to be on his show.

42. Once the band was made, Mr. Combs’ contempt for women was readily apparent as he continued to display aggressive and hostile behavior towards Ms. Richard and her all-female *Danity Kane* bandmates. Mr. Combs regularly referred to the five women as “bitches” and “hoes” and denigrated their physical appearances. By way of example, Mr. Combs stated that Ms. Richard was too skinny and needed to “do something about this [her face].”

43. On one occasion in or around 2005, during the first season of *Making The Band 3*, Ms. Richard observed Mr. Combs’ ex-partner and the mother of three of his children, Kim Porter, leaving Mr. Combs’ recording studio in tears with visible facial injuries including a lacerated lip. Realizing that Mr. Combs was capable of committing acts of violence against women caused Ms. Richard to feel deep apprehension and fear that Mr. Combs could one day physically harm her.

44. Ms. Richard was present when Mr. Combs was introduced to Casandra (“Cassie”) Ventura for the first time, in or around 2006. The moment Mr. Combs first saw Ms. Ventura, his demeanor noticeably shifted. Mr. Combs positioned himself directly in front of Ms. Ventura’s seat, invading her personal space, and fixated on her with an intense, unyielding stare, isolating her from the other people in the room including Ms. Ventura’s then-boyfriend, music producer Ryan Leslie.

45. Coincidentally, this first meeting between Mr. Combs and Ms. Ventura was the first time that Ms. Richard was in Mr. Combs' presence without a camera crew filming. Observing Mr. Combs behave in such an intimidating, predatory manner the first time that they were off camera made Ms. Richard feel deeply apprehensive and afraid of him.

46. Subsequently, Ms. Ventura ended her relationship with Mr. Leslie and began dating Mr. Combs, who would become violent and abusive towards her.

III. Danity Kane: Sexual harassment, inhumane treatment, and denial of basic needs by Mr. Combs

47. For the majority of Ms. Richard's tenure as a member of *Danity Kane* and *Diddy* – *Dirty Money*, Mr. Combs required her to remain at his various residences and studios in New York, Los Angeles, Florida, and New Jersey for activities such as recording, rehearsing, dressing, preparing costumes, and exercising.

48. Throughout the productions of *Making the Band 3* and *4*, Mr. Combs deprived Ms. Richard and her *Danity Kane* bandmates of basic needs such as adequate food and sleep. When Ms. Richard or her *Danity Kane* bandmates requested meals or rest, Mr. Combs refused and chastised them with derogatory comments like "you bitches don't want this" or "y'all are not hungry enough" and "I'm paying you bitches to work." This demeaning behavior gradually undermined Ms. Richard's confidence and contributed significantly to her growing feelings of insecurity and fear of reprisal from Mr. Combs.

49. Upon information and belief, Mr. Combs would regularly be awake for prolonged periods of time because he was high on drugs. During these periods, Mr. Combs demanded continuous access to Ms. Richard and her *Danity Kane* bandmates, often forcing them to record and rehearse for stretches of 36 to 48 hours without breaks. Forced to choose between eating and sleeping, Ms. Richard lost a significant amount of weight, weighing approximately 100 pounds

at a height of 5'4". Ms. Richard began to normalize these extreme conditions and perceive them as standard requirements of her participation in *Danity Kane*.

50. Mr. Combs regularly sent his associates to wake Ms. Richard and her *Danity Kane* bandmates in the overnight hours so he could watch them rehearse. The regularity of these disturbances led Ms. Richard to adapt by sleeping in a sitting position, fully dressed and with makeup on, heightening her anxiety. Over time, this abnormal sleeping arrangement came to feel routine, further normalizing Mr. Combs' invasive demands.

51. In addition to exhausting rehearsals, Mr. Combs required Ms. Richard and her bandmates to participate in intense workouts with a personal trainer. On one occasion, while running on the beach, Ms. Richard became so dehydrated that she vomited. Instead of offering medical assistance, MTV Networks' camera crew filmed the incident – contributing to her acceptance of such treatment as part of her professional life.

52. The unrelenting and rigorous schedule of rehearsals, performance, and near-constant filming that Mr. Combs imposed caused Ms. Richard to experience extreme weight loss, dehydration, fatigue, and painful rashes from the microphone pack she was required to wear on her back. These conditions intensified Ms. Richard's feelings of powerlessness, as she increasingly viewed them as part of her professional reality and feared the consequences of any resistance.

53. In a further assertion of power and dominance, Mr. Combs insisted on holding meetings while dressed only his underwear. On one occasion in 2008 at his Miami residence, Mr. Combs emailed Ms. Richard directing her to meet him in the living room. When she arrived, he was wearing only his underwear. Ms. Richard asked Mr. Combs to put clothes on, but he refused, stating "This is my fucking house." Mr. Combs then conducted a meeting lasting approximately an hour while dressed in his underwear, causing Ms. Richard to feel violated and embarrassed, and amplifying her feelings of powerlessness.

54. Following the official *Danity Kane* breakup in early 2009 effectuated by Mr. Combs, Ms. Richard experienced significant financial hardship. With no prospective opportunities for employment within the entertainment field, Ms. Richard spent several months traveling from Baltimore to Daddy's House Recording Studio in New York, without pay or allocated budget. Mr. Combs promised that Ms. Richard's compositions would result in payment of license fees and royalties pursuant to her contract with Bad Boy Records; however, no such compensation was ever reported or paid to Ms. Richard. Damages relative to these continuing copyright infringements will be proved at trial.

IV. Diddy – Dirty Money: Ms. Richard experiences Mr. Combs' gender-based physical violence, criminal acts, sexual assault, threats, and intimidation

55. By approximately the fall of 2009, many of Ms. Richard's compositions had been recorded by other Bad Boy Records artists. Due to the success of her compositions, Ms. Richard was invited to meet with musical artist Kalenna Harper ("Ms. Harper") and shortly thereafter Mr. Combs, Ms. Richard and Ms. Harper formed a new group: *Diddy – Dirty Money*.

56. Initial recording for *Diddy – Dirty Money's* album *Last Train to Paris* took place in Mr. Combs' home on Doheny Drive in Los Angeles, California. On the first day of recording, Ms. Richard and Ms. Harper arrived at Mr. Combs' home and waited in the kitchen, where Mr. Combs' girlfriend, Ms. Ventura, was frying eggs for him.

57. Ms. Richard observed Mr. Combs come down the stairs looking high on drugs, enter the kitchen, approach Ms. Ventura, and scream, "I've been asking you for my shit; I can't stand you bitch, you never do it right!" Mr. Combs pushed Ms. Ventura against the wall and choked her, then picked up the scalding hot pan of eggs and threw it at her, causing her to fall to the ground in a fetal position. Cursing and screaming, Mr. Combs dragged Ms. Ventura up the stairs.

58. Frozen in shock and terror, Ms. Richard heard glass shattering, crashing, and banging noises as Mr. Combs dragged Ms. Ventura up the stairs. Ms. Richard wanted to intervene and help Ms. Ventura, but Ms. Harper adamantly refused to interfere in Mr. Combs' relationship, and physically led Ms. Richard out of the residence. Terrified and shaken, Ms. Richard returned to her hotel where she was unable to sleep due to worrying about Ms. Ventura and her own safety.

59. The following day, Ms. Richard received a call demanding that she return to Mr. Combs' residence to continue recording. Mr. Combs brought Ms. Richard and Ms. Harper into the recording room at his studio, locked the door, dimmed the lights, and gave each of them flowers. Mr. Combs went on at length, stating: "this is normal, this was just a lover's argument where no one was hurt . . . this is what love is... I'm giving you an opportunity, if you want to make it you'll shut your mouth...*if you say anything, there will be consequences.*" Mr. Combs further warned that "*people end up missing.*" Being threatened while locked for over 20 minutes in a small, enclosed space with Mr. Combs after observing Mr. Combs violently assault Ms. Ventura the day before, Ms. Richard was terrified and genuinely believed that Mr. Combs would follow through on his threats.

60. In or around November 2009, after the Soul Train Awards in Atlanta, Georgia, Mr. Combs flew Ms. Richard and Ms. Harper to his house in New York on his private jet for an afterparty. There were many well-known celebrities at the afterparty, and copious amounts of illegal drugs were being openly consumed. Upon information and belief, Mr. Combs had arranged for dozens of young women and girls – some of whom appeared to be underage – to be transported to the party. The women arrived wearing little to no clothing and were given drugs and alcohol. Many of them appeared lethargic or passed out while Mr. Combs and his guests performed sexual acts on them. Ms. Richard believed that her presence at the party was a test to see whether Mr. Combs could trust her.

61. Mr. Combs repeatedly said things like “this is a buffet, enjoy yourselves; this is what we do, this is how we party.” Ms. Richard felt shocked and horrified at the sight of Mr. Combs and his guests violating incapacitated young women, and implored Mr. Combs’ personal assistant Capricorn Clark to allow her to leave. Ms. Clark insisted that Ms. Richard wait 15 minutes for Ms. Clark to “make it make sense” – that is, to make Ms. Richard’s exit less conspicuous so that Mr. Combs would not notice that she had left. Knowing that she was not free to leave and had to wait for Ms. Clark to help her orchestrate her departure, Ms. Richard experienced feelings of panic and being trapped against her will.

62. Mr. Combs regularly placed Ms. Richard in similar situations with no means to escape. At Mr. Combs’ drug-fueled parties, his guests, including Ms. Richard, were required to surrender their phones upon entry. Mr. Combs kept the doors locked and guarded by security personnel, making it impossible for Ms. Richard to leave without alerting Mr. Combs that she had done so. Mr. Combs hired police officers to attend his parties, sending a clear message to guests that his influence extended to law enforcement officers, and creating a climate of fear and a tacit warning that reporting him to authorities would be both unacceptable and futile.

63. On many occasions, Mr. Combs had parties at his Miami, Florida residence that lasted for several days. At one of the parties, Ms. Richard witnessed Mr. Combs openly stating that he had arranged for busloads of young “exotic” girls, such as mixed Black and Asian, Indonesian, and albino. Once again, Ms. Richard observed inebriated young girls being sexually violated by Mr. Combs and his guests. In a state of panic and terror, Ms. Richard fled to the bedroom Mr. Combs had insisted she stay in and barricaded the door shut with furniture.

64. Mr. Combs openly assaulted Ms. Ventura in front of Ms. Richard and other witnesses on multiple occasions. On one occasion in or around the fall of 2009, *Diddy – Dirty Money* was in New York preparing to perform at a festival. Inside their vehicle, Mr. Combs grabbed Ms. Ventura’s neck, pulled her out of the van onto the grass and pinned her head down,

choking her while yelling “you gonna get fucked up today.” This incident took place in the backstage area just outside the festival and was entirely visible to passersby.

65. In another instance, in or around early 2010, Mr. Combs punched Ms. Ventura in the face in the bathroom of a party in Los Angeles. Frequently, when Ms. Ventura attempted to voice an opinion or stand up to Mr. Combs, he would strike her or wrap his hands around her throat and choke her.

66. On the first several occasions that they observed Mr. Combs assault Ms. Ventura, Ms. Richard and Ms. Harper spoke with Ms. Ventura to support and encourage Ms. Ventura in escaping her abusive relationship with Mr. Combs. Every time that Ms. Richard and Ms. Harper tried to intervene, Mr. Combs learned of the conversation and became irate. Mr. Combs screamed at the women: “Y’all bitches don’t get in my relationship,” “Don’t tell my bitch [Ms. Ventura] what she need to be doing,” “Just make money and shut the fuck up,” “I end artists,” “I shelve careers,” “*You could be missing*,” and “*You bitches want to die today*,” among other threats.

V. Interscope Records Enabled Mr. Combs’ Gender-Motivated Violence

67. In or around late 2009 or early 2010, Bad Boy Entertainment (“Bad Boy”) entered an agreement with Interscope Geffen A&M Records (“Interscope”). Upon information and belief, Bad Boy was paid \$50 million in exchange for Bad Boy’s future releases being distributed through Interscope. In so doing, Mr. Combs intended to capitalize on Interscope’s significant resources and enhance the promotion and sales of Bad Boy’s releases, including *Diddy – Dirty Money*’s upcoming album.

68. In the weeks and months leading up to the Bad Boy-Interscope deal, Mr. Combs had frequent meetings with producer and then-CEO of Interscope Records Jimmy Iovine. On one such occasion, Combs hosted a dinner at a West Hollywood, California restaurant, which Ms. Richard and Ms. Harper were required to attend. Among the guests at the dinner were celebrities like NeYo and Usher, as well as Mr. Iovine. At the dinner, Mr. Combs and Ms. Ventura had an

argument. In front of the dinner guests, Mr. Combs hissed at Ms. Ventura in a screaming whisper and forcefully punched her in the stomach causing her to double over in visible pain, crying. Ms. Clark escorted Ms. Ventura out of the restaurant, and Mr. Combs remained and continued socializing with the dinner guests. At this point, Interscope Records clearly had actual knowledge that Combs was dangerous around females and that Combs was willing to brazenly batter a female in public.

69. Even after Mr. Iovine watched Mr. Combs commit a violent assault in front of numerous high-profile witnesses, the Bad Boy-Interscope deal took place and remained in effect, providing Mr. Combs with immense financial rewards and enabling him to commit further acts of violence without fear of repercussions. Watching Mr. Combs openly assault Ms. Ventura in front of Mr. Iovine and various celebrities – and observing that other powerful music industry representatives were complicit in Mr. Combs’ behavior – amplified Ms. Richard’s fears that Mr. Combs could one day harm her and that his actions would be accepted and normalized by everyone surrounding him.

70. As part of the agreement between Bad Boy and Interscope, Interscope heavily promoted Diddy – Dirty Money’s *Last Train to Paris* album. Mr. Iovine had presented Mr. Combs with a demo of “*Coming Home*” for him to produce – a song that would become a multi-platinum hit.³ Mr. Iovine was encouraging Mr. Combs to develop a new sound for the album, into which Interscope was investing significant resources. Ms. Richard, Ms. Harper and Ms. Ventura all provided vocal performances for this project. Released in November 2010, the album “*Last Train to Paris*” became *Diddy – Dirty Money*’s most commercially successful project, providing vast financial rewards to both Interscope and Mr. Combs.

³ The album “*Last Train to Paris*” credits both Interscope Records and Bad Boy Records. <https://www.discogs.com/master/347136-Diddy-Dirty-Money-Last-Train-To-Paris>; <https://www.revolt.tv/article/2020-12-14/64067/studio-sessions-never-before-heard-stories-of-diddy-dirty-moneys-last-train-to-paris-creation>

VI. Diddy- Dirty Money: Mr. Combs subjects Ms. Richard to Labor Trafficking and Oppressive Working Conditions

71. In or around the fall of 2009, *Diddy – Dirty Money* began recording the song *Love Comes Down*. Upon information and belief, Mr. Combs continued to use drugs that caused him to remain awake for prolonged periods of time. When he was awake, he would demand that Ms. Richard and Ms. Harper record in the studio, where they would spend three to four consecutive days recording without a break to eat or sleep. Mr. Combs required Ms. Richard and Ms. Harper to remain at his home(s) continuously, denying the opportunity to return to their hotel rooms for breaks. The degree of control Mr. Combs exercised over Ms. Richard’s daily life and basic needs exacerbated the significant power imbalance and threatening atmosphere that ensured Ms. Richard’s compliance with his demands.

72. Mr. Combs regularly left the studio and required Ms. Richard and Ms. Harper to stay and write verses to songs. Occasionally, Ms. Richard tried to leave to get something to eat or to go to her hotel. Whenever Ms. Richard tried to leave, Mr. Combs would call and demand, “where the fuck are you” and “we have an album to make.” Mr. Combs frequently made threats, especially if they asked for food or rest, stating “you’re a bitch,” “I don’t want to see your fucking face,” “I make n****s go missing,” and “I make things go away.” Each time, Ms. Richard returned to the studio immediately, believing that Mr. Combs was capable of following through with his threats.

73. Mr. Combs criticized Ms. Richard for being “too skinny,” yet denied her requests for food and demanded that she drink only peanut butter shakes. Mr. Combs had full meals prepared by a chef and ate them in front of Ms. Richard and Ms. Harper, never offering them food.

74. Ms. Richard and Ms. Harper begged for food and rest breaks, but Mr. Combs refused, making statements such as “absolutely fucking not” and “this is what it takes to be great.”

Mr. Combs' responses underscored the threat he posed and heightened Ms. Richard's concerns for her safety and well-being.

75. As Ms. Richard continued to work non-stop – transitioning between the studio, rehearsals, workouts, and back to the studio – she became severely dehydrated and experienced chronic stomach cramping from being undernourished and excessively thin. On the numerous occasions that she told Mr. Combs that she was not feeling well, he called her lazy and dismissed her health concerns, instilling in her further apprehension of communicating her needs.

76. In or around the summer of 2010, Ms. Richard experienced abdominal pain, swollen glands and a fever. She was hospitalized and diagnosed with arthralgia (joint pain due to overuse, sprains, tendonitis and infection), anemia, and a low white blood cell count. Ms. Richard presented Mr. Combs with her medical records specifying that she needed to emphasize eating well, being adequately hydrated, and getting adequate rest, but Mr. Combs ordered her to report to the studio the next day for another multi-day recording session. Mr. Combs' blatant disregard for her health and well-being cemented Ms. Richard's fear of his authority and control over her career and health.

77. Ms. Richard continued to witness Mr. Combs' abuse towards Ms. Ventura. Ms. Ventura often wore sunglasses and makeup in an attempt to hide visible injuries. These incidents further solidified Ms. Richard's fear of Mr. Combs, as they were constant reminders of the physical dangers she potentially could – and eventually would – face.

78. Mr. Combs often exhibited uncontrollable anger during recording sessions, throwing objects like albums, laptops, and food against the wall or at individuals. Mr. Combs frequently flew into frenzied, unpredictable rages. Ms. Richard feared making any misstep that could direct his anger toward her. However, her fears went beyond her immediate physical safety. Because she had witnessed Mr. Combs' violent nature, a side of Mr. Combs that the world had not yet seen, she feared that falling out of Mr. Combs' good graces or worse, standing up to him

or speaking out against him, could result in serious harm to her. Ms. Richard frequently thought about Mr. Combs' threat about making people "go missing" and feared taking any action that could label her as a target.

79. Despite Mr. Combs' violence, threats, and misogyny, *Diddy-Dirty Money* experienced significant sales of records, selling 2,000,000 copies of one single, 500,000 of another in the US, and in Australia 5,000,000 single copies. Ms. Richard's unpaid wages and royalties are estimated at \$1,200,000.00. Ms. Richard's unpaid touring wages are estimated at over \$350,000.00 for touring dates within the United States alone.

VII. CIROC / DiddyBeats / Nonpayment

80. In or around the summer of 2009, Ms. Richard and Ms. Harper were required by Mr. Combs to perform as part of *Diddy – Dirty Money* and attend numerous promotional events, including late or overnight parties, all of which were under contract between Mr. Combs and CIROC Vodka, or between Mr. Combs and DiddyBeats pursuant to the Bad Boy – Interscope record deal.

81. Ms. Richard was never compensated for the extra time she spent fulfilling Mr. Combs' promotional contracts, including the CIROC and the DiddyBeats campaign. Mr. Combs was paid approximately \$250,000 per CIROC appearance. Mr. Combs did not compensate Ms. Richard or Ms. Harper for these appearances, other than just \$5,000 each on a handful of occasions. Mr. Combs' ongoing explanation for withholding compensation was that their appearances were a requirement for their tour. Additionally, Ms. Richard was required to appear, and to promote DiddyBeats, through parties, album songs and videos.

82. Over time, Mr. Combs was paid \$6.25 million for 25 CIROC shows that Ms. Richard was required to attend.⁴ Following each show, Ms. Richard and Ms. Harper approached

⁴ Numerous videos depict Ms. Richard performing at CIROC events, such as the video available at <https://youtu.be/HtliNNsIgw?si=4FFCB1tD6gCeX4R3>. This video depicts Ms. Richard singing as part of *Diddy – Dirty Money* and is representative of her performances as part of Mr. Combs' CIROC campaign.

Mr. Combs to inquire about their insufficient and sporadic payments. Mr. Combs routinely responded with statements such as “You bitches aren’t grateful” and “you don’t want this.” Ms. Richard estimates losses from CIROC campaign promotions totaling at least \$1,562,500.00. Upon information and belief, Mr. Combs received an advance on DiddyBeats for which Ms. Richard received no compensation.

VIII. Mr. Combs Sexually Harasses and Assaults Ms. Richard

83. Between approximately 2009 and 2011, throughout *Diddy – Dirty Money*’s recording process, rehearsals, and performances, Mr. Combs repeatedly ordered Ms. Richard to strip down to her underwear. He frequently referred to her as a “bitch” or “whore” and made demeaning remarks about her body, alternatingly calling her lazy, fat, ugly, and skinny, particularly in front of his friends, producers, and bodyguards.

84. Mr. Combs frequently held meetings with Ms. Richard wearing only his underwear, despite Ms. Richard’s protests and repeated requests for him to put on clothing. In response, Mr. Combs called her a “bitch” and “whore” and reminded her that she should be grateful for the opportunity to be there.

85. Often while they were recording in the studio, Mr. Combs would hold “parties” where he would invite young men and women, who were often scantily dressed and appeared underage, to use drugs and engage in sex acts. Ms. Richard observed Mr. Combs and his colleagues kissing, groping, and inappropriately touching the young women. Upon information and belief, the participants often left the immediate area to have sex and returned shortly thereafter.

86. On numerous occasions between approximately 2009 and 2011, under the guise of preparing for performances, Mr. Combs would intrude into Ms. Richard's changing room at *Daddy's House* unannounced while Ms. Richard was undressed.

87. Even though a female stylist was present and assisting Ms. Richard with her wardrobe, Mr. Combs would grope Ms. Richard's body, including her bare buttocks and her chest area near her breasts. With no legitimate purpose, and without Ms. Richard's consent, Mr. Combs caressed her buttocks to show the stylist where he wanted her high-waisted panties positioned, and attempted to touch her breasts, claiming to show the stylist where he wanted her bra straps to go.

88. When Mr. Combs would enter the changing room, Ms. Richard would cover her chest with her hands to prevent Mr. Combs from seeing or touching her breasts. When Mr. Combs would touch her body, Ms. Richard would attempt to swat his hands away and state "don't touch me."

89. Mr. Combs frequently smacked Ms. Richard's bare buttocks and often commented on her body, noting that although she was "too skinny," she had an "ass."

90. Ignoring her visible and communicated discomfort, Mr. Combs persisted and continued to intrude when Ms. Richard was in the dressing room, continued to touch her buttocks and breast area under the guise of showing the stylist what to do, and continued to smack her buttocks without her consent.

91. In or around October 2010, *Diddy – Dirty Money* performed in Glasgow, Scotland, where Mr. Combs engaged in overt sexual advances towards Ms. Richard. On numerous occasions when Ms. Richard exited the dressing room fully styled, Mr. Combs looked at her approvingly and smacked her buttocks while making comments such as "you're looking good," "OK Dawn, OK," and "I see what that is" in a flirtatious tone. Each time, Ms. Richard moved away and asked him not to touch her, but Mr. Combs disregarded her protests.

92. On their last night in Glasgow, Ms. Richard witnessed Mr. Combs and several other males gang-banging Mr. Combs' female assistant at the hotel pool. Ms. Richard immediately left and went to her hotel room.

93. On their flight back to the United States the next day, Ms. Richard asked Mr. Combs where his assistant was; Mr. Combs replied, "I don't give a fuck where that bitch is." Ms. Richard later learned that Mr. Combs had taken his assistant's passport with him to the United States, leaving the assistant stranded in the United Kingdom.

94. In Glasgow, Ms. Harper confided in Ms. Richard that her husband and manager, Tony Vick ("Mr. Vick"), was abusive. After an especially severe assault, she confided in Ms. Richard that she wanted to leave Mr. Vick, and Ms. Richard helped her to plan her exit from the relationship. However, Ms. Harper and Mr. Vick reconciled, and both Mr. Combs and Mr. Vick – who had a close relationship – learned of Ms. Richard's role in helping Ms. Harper. Both Mr. Combs and Mr. Vick became noticeably distrustful of Ms. Richard, which exacerbated her fears of harm and reprisal.

95. When Mr. Combs would require his *Diddy – Dirty Money* bandmates to stay at his residence in Miami, Ms. Richard would barricade herself inside her room at night, placing heavy furniture against the door because she feared being harmed in her sleep.

96. In or around late December 2010, Ms. Richard, Ms. Harper, and Ms. Ventura were in Mr. Combs' Los Angeles home when Mr. Combs stated "I want to gift you [fake] titties for Christmas." Mr. Combs reached out and cupped Ms. Richard's breasts without her permission and stated "You're an A; I'm thinking a D." Ms. Richard recoiled in shock and left the room.

97. Throughout the abovementioned time period, when Ms. Richard resisted Mr. Combs' advances, Mr. Combs retaliated by denying her singing parts in songs, removing her from songs, refusing to allow her to sing in performances, and turning her microphone off during

performances. The more Ms. Richard rebuffed his advances, the more Mr. Combs' retaliatory behavior increased.

IX. Mr. Combs Assaults and Falsely Imprisons Ms. Richard

98. In or around December 2010, *Diddy – Dirty Money* was preparing for an upcoming performance on *Saturday Night Live* (“SNL”). As usual, rehearsals lasted for days without the opportunity to eat or rest, and the rehearsal schedule was unpredictable. After waiting all day for Mr. Combs to call or send a car, Ms. Richard received a phone call from Mr. Combs demanding “Where the fuck are you bitches? You bitches don’t want this; y’all don’t deserve to have someone pick you up; get a cab.” Ms. Richard and Ms. Harper immediately took a taxi to SIR Studios at 520 West 25th St, New York NY, anxious because Mr. Combs sounded enraged.

99. Upon their arrival at SIR Studios, Mr. Combs and Harve Pierre were waiting for them in the lobby. Mr. Combs screamed obscenities at them: “**Where the fuck were you bitches? You bitches don’t want to win . . . you don’t want this . . . I’m so tired of y’all.**” Ms. Richard noticed that people in the lobby were reacting to Mr. Combs’ tirade. Embarrassed, Ms. Richard asked Mr. Combs to stop swearing and calling them “bitches” in front of everyone.

100. Mr. Combs’ facial expression shifted as he stepped towards Ms. Richard, raised his arm, and swung his fist toward her face. Believing that Mr. Combs was going to hit her, Ms. Richard braced for the impact. Before Mr. Combs could strike her, Mr. Combs’ bodyguard grabbed her, escorted her out of the studio and forced her into the Bad Boy Records Bentley that was parked outside. Ms. Harper ran after Ms. Richard, and Mr. Combs’ bodyguard closed and locked the Bentley’s doors with both women inside.

101. Inside the vehicle, Ms. Richard realized there were no interior door handles, and that they were locked inside with no way to escape. Ms. Richard’s belongings were in the studio, but she was able to call her father from Ms. Harper’s cell phone. Ms. Richard relayed to her father what had happened, and that she needed help and feared that she would go missing. Moments

later, Mr. Combs' bodyguard removed only Ms. Harper from the Bentley, leaving Ms. Richard locked in the car alone for over two hours.

102. Ms. Richard screamed as loudly as she could, but no one responded. It was late evening in the wintertime, the windows were heavily tinted, and the interior of the car was dark except for faint interior lights. Ms. Richard's belongings and winter coat were in the studio, while the ignition was off and there was no heat. With Mr. Combs' prior threats and violence running through her mind, Ms. Richard felt sheer panic, terror, and feelings of claustrophobia at being locked in a small, dark, enclosed space with no way to communicate or call for help. She began to feel cold and feared for her life, not knowing when or if she would be released.

103. Ms. Richard's father drove to New York from Baltimore and arrived at the studio approximately two hours later. Only after her father arrived and demanded to see her did Mr. Pierre order Mr. Combs' bodyguard to release Ms. Richard from the vehicle. Mr. Pierre ushered Ms. Richard's father between several rooms at SIR Studios, where he waited for approximately two hours before being able to confront Mr. Combs. Once Ms. Richard's father expressed that he intended to contact police, Mr. Combs warned him to "think about your family" and "think about your daughter's career." Her father appeared visibly frightened by Mr. Combs' threats and actions, which in turn made Ms. Richard feel terrified for herself and her family's safety.

104. The next night, *Diddy – Dirty Money* performed on SNL. Mr. Combs subsequently called Ms. Richard, complimented her performance, and concluded with a threat: "you don't call your dad unless you're in the hospital."

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X. Unjust Enrichment of Defendants by Breach of Contract and/or Copyright Infringement

105. As a member of *Danity Kane*, Ms. Richard has performed on over 15 songs⁵ and holds composition credits for more than 3 songs.⁶ Defendants have failed to account to or pay Ms. Richard as agreed for her compositions and her performances and have breached contracts and infringed her copyrights, all of which has unjustly enriched Defendants.

106. As a member of *Diddy-Dirty Money*, Ms. Richard has performances recorded on over 9 songs;⁷ additionally Ms. Richard has composition rights and credits on more than 5 songs.⁸ Defendants have failed to account to or pay Ms. Richard as agreed for her compositions and her

⁵ 1. "Show Stopper" 2. "Ride for You" 3. "Damaged" 4. "Bad Girl" 5. "Pretty Boy" 6. "Striptease" 7. "Poetry" 8. "Lights Out" 9. "Sucka for Love" 10. "Ain't Going" 11. "2 of You" 12. "Do Me Good" 13. "Ecstasy" (featuring Rick Ross) 14. "Lemonade" (featuring Tyga) 15. "All in a Day's Work"

⁶

1. "Bad Girl" (featuring Missy Elliott) Written by Dawn Richard, Mary Brown, Mary Brockert, Missy Elliott, Sean Combs, Quincy Jones, David Wolinski, Shanell Woodgett
2. "Secret Place" (Interlude) • Performed by Dawn Richard
3. "Infrared" Written by Dawn Richard, Kwame Holland

⁷ 1. "Angels"

2. "Love Come Down"
3. "Yeah Yeah You Would"
4. "Hate That You Love Me"
5. "Your Love" (featuring Trey Songz)
6. "Ass on the Floor" (featuring Swizz Beatz)
7. "Yesterday" (featuring Chris Brown)
8. "I Hate That You Love Me"
9. "Shades" (featuring Lil Wayne and Justin Timberlake)

⁸ 1. "I Hate That You Love Me"

Written by Dawn Richard, Richard Butler, Warren Trotter, Arden Altino, Durrell Artaze Babbs

2. "Looking for Love" (featuring Usher)
Written by Dawn Richard, Usher Raymond IV, Sean Combs, Kalenna Harper, Kevin "KC" Cossom, Marcella Ms. Lago Araica, Eric "E-Class" Akon, Mario "Yellowman" Winans

3. "Strobe Lights" (featuring Lil Wayne)
Written by Dawn Richard, Lil Wayne, Sean Combs, Richard Butler, Warren Trotter, Arden Altino, Marcella Ms. Lago Araica, Kevin "KC" Cossom

4. "Loving You No More" (featuring Drake)

Written by Drake, Dawn Richard, Sean Combs, Richard Butler, Warren Trotter, Arden Altino, Mario Winans, Jerry "Wonda" Duplessis

5. "Change" Written by Dawn Richard, Richard Butler, Warren Trotter, Arden Altino

performances and breached contracts and/or infringed her copyrights, unjustly enriching Defendants.

107. In 2020, Mr. Combs selected Ms. Richard for a reboot of *Making The Band*, and Ms. Richard spent hours preparing to be a judge on the new show. However, the COVID-19 pandemic halted those plans, and Ms. Richard was never compensated in any way.

108. On or about July 1, 2021, Mr. Combs and Bad Boy Records (or Holdings or both), directed Janice Combs Publishing Inc. to assign its administration rights of Ms. Richard's songs,⁹

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SONG TITLE	WRITER NAME	ARTIST
86	CARLA HAYNES-CARTER (20), DAWN RICHARD (20) , ANDREW SCOTT (60)	
2 SIDES (TWO SIDES)	Ray Romulus (15), Dawn Angelique Richard (13.34) , Jeremy Reeves (15), Jonathan Yip (15), Malcolm McDaniel (13.33), Ray McCullough (15), Rosina Russell (13.33)	DANITY KANE
AIN'T GOING	Iyanna Dean (45), Bernard Malik (50), DAWN RICHARD (2.5) , WANITA WOODGETT (2.5)	DANITY KANE
ASS ON THE FLOOR	SEAN COMBS (5), KASSEEM DEAN (55), KALENNA HARPER (20), DAWN RICHARD (10) , LEROY WATSON (10)	DIDDY-DIRTY MONEY
Burn So Deep	James Michael Edgar (50), DAWN RICHARD (50)	Jimmy Edgar Feat. Dawn Richard
Dance	Noise Castle (25), Ester Dean (25), DAVID RYAN HARRIS (25), Dawn Richard (25)	DAWN RICHARD
Faith	Ricky Lewis (50), DAWN RICHARD (50)	
FIREFLIES	DAWN RICHARD (25) , HARMONY SAMUELS (50), ANDREW SCOTT (25)	ZENDAYA
FLASHBACK (INTERLUDE)	Romeo IX (50), DAWN RICHARD (25) , WANITA WOODGETT (25)	DANITY KANE
HATE YOU NOW	Marcela aracia (5), SEAN COMBS (10), JAMES FAUNTLEROY (35), KALENNA HARPER (2.5), Nathaniel Hills (45), DAWN RICHARD (2.5)	DIDDY-DIRTY MONEY
HOME FOR CHRISTMAS	DAWN RICHARD (100)	DANITY KANE
HURT (LOVING YOU NO MORE)	SEAN GARRETT (50), AUBREY GRAHAM (15), DAWN RICHARD (5) , MIKAL SNODDY (25), MARIO WINANS (5)	DIDDY
LIGHTS OUT	Craig Betz (20), Neil Betz (20), SEAN COMBS (5), DAWN RICHARD (50) , MARIO WINANS (5)	DANITY KANE
LOVE COME DOWN	Shawn Carter (7.5), SEAN COMBS (17), BERRY GORDY JR (1.5), KALENNA HARPER (10.63), ROB HOLLADAY (34), ALPHONSO MIZELL (1.5), FREDDIE PERREN (1.5), DAWN RICHARD (10.62) , DEKE RICHARDS (1.5), LEROY WATSON (12.75), KANYE WEST (1.5)	DIDDY
PERFECTLY BLIND	BRIAN ANDREWS (6.25), Robert Curry (6.25), MICHAEL MCCLUNEY (6.25), QWANELL MOSLEY (25), DIRK PATE (25), DAWN RICHARD (25) , Willie Taylor (6.25)	DAY26
SECRET PLACE (INTERLUDE)	SHANNON BEX (10), AUNDREA FIMBRES (10), AUBREY O'DAY (10), DAWN RICHARD (10) , MARIO MENDELL WINANS (50), WANITA WOODGETT (10)	DANITY KANE
Stopwatch	Derek Scott Bergheimer (10), Jesse Dee Boykins III (33), DAWN RICHARD (20) , Karl Rubin (5), Travis Wayne Stewart (32)	
Stopwatch (Salva Remix)	Jesse Dee Boykins III (20), DAWN RICHARD (10) , PAUL SALVA (50), Travis Wayne Stewart (20)	
STRIP TEASE	Marcella Araica (5), SHANNON BEX (6), AUNDREA FIMBRES (6), NATE HILL (45), AUBREY O'DAY (6), DAWN RICHARD (6) , JAMES WASHINGTON (20), WANITA WOODGETT (6)	DANITY KANE
Strobe Lights	SEVEN AURELIUS (30), Dwayne Carter (10), Kenneth Coby (7.5), KALENNA HARPER (27.5), Tim McEwan (20), DAWN RICHARD (5)	DIDDY-DIRTY MONEY
TAILOR MADE SUIT	DANIEL BRYANT (0), PHILLIP BRYANT (0), CYNTHIA LOVING (0), DAWN RICHARD (0)	LIL MO
TELL ME	Ray Romulus (12.50), Briana Jackson (16.67), Dawn Angelique Richard (16.67) , Jeremy Reeves (12.50), Jonathan Yip (12.50), Ray McCullough (12.50), Rosina Russell (16.66)	DANITY KANE
YEAH YEAH YOU WOULD	MARCELLA ARACIA (5), RICHARD BUTLER (12), KALENNA HARPER (23), Floyd Hills (45), DAWN RICHARD (5) , LEROY WATSON (10)	DIDDY-DIRTY MONEY

held from her tenure with Defendants in the years 2005-2012, to Sony Songs, a division of Sony Music Publishing LLC (“Sony”). The assignment, signed by Ms. Richard on October 22, 2024, purported to credit, through a semi-annual accounting, Ms. Richard’s royalty account for Ms. Richard’s compositions from between 80 to 90% of publisher’s share. However, no statements were ever provided, no payments were ever made, and no reversions nor assignment were ever recorded with Performing Rights Organizations or other royalty collecting entities by Defendants or by Sony. Defendants have wholly failed to account to or pay Ms. Richard as agreed for her compositions and her performances in breach of the assignment and have thereby infringed her copyrights, resulting in Defendants being unjustly enriched.

109. During the summer of 2023, Mr. Combs’ new record company, Love Records Inc., tendered a contract for negotiation to Ms. Richard for the song entitled “*Deliver Me*,” embodied as Track 3 on *The Love Album: Off The Grid*, officially released on September 15, 2023. Upon information and belief, *Deliver Me* sold well prior to Mr. Combs’ legal troubles in November 2023. Continuing to the present, Ms. Richard sought to establish her rightful percentage as a 21% composer on *Deliver Me*, Mr. Combs personally called Ms. Richard and left a voicemail complaining about her fair requests. Upon information and belief, Mr. Combs directed his attorneys to avoid confirming the composition percentages on the song; and in fact, list composers who played no part in composing the song. As a result, the contract was never signed by either Ms. Richard or Love Records Inc. Nevertheless, Ms. Richard obtained a copyright registration certificate on a timely basis; said registration lists authors/claimants as agreed when the song was created in 2009. That registration is filed separately in the Court and supports Ms. Richard’s claim of copyright infringement by Defendants herein. Defendants Love Records Inc. and Mr.

Combs infringed Ms. Richard's copyrights in the composition of *Deliver Me* by releasing *Deliver Me* without Ms. Richard's permission and without compensation.

DAMAGES

110. As a result of the acts and conduct complained of herein, Ms. Richard has suffered and will continue to suffer the loss of income, wages, benefits, royalties, promotional fees, touring fees and other compensation. Ms. Richard has also suffered, among other things, future pecuniary losses, emotional pain, suffering, inconvenience, loss of enjoyment of life, post-traumatic stress disorder, anxiety disorder, insomnia, panic attacks and other non-pecuniary losses entitling her to an award of compensatory and punitive damages, injunctive and declaratory relief, attorney's fees and costs, and other remedies as this Court may deem appropriate.

FIRST CAUSE OF ACTION

**Violation of The Victims of Gender-Motivated Violence Act, N.Y.C. Admin.
Code §§ 10-1101, *et seq.* ("VGMVPL")
*Against Defendants Sean Combs, Harve Pierre, Interscope Records & Bad Boy
Records***

111. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

112. The above-described conduct of Mr. Combs, including but not limited to Mr. Combs' physical and sexual assaults, harassment, and unlawful imprisonment of Plaintiff in New York City constitutes a "crime of violence" against Plaintiff and is a "crime of violence motivated by gender" as defined in § 10-1103 of the New York City VGMVPL. The term "crime of violence" means an act or series of acts that would constitute a misdemeanor or felony against the person as defined in state or federal law if the conduct presents a serious risk of physical injury to another, whether or not those acts have actually resulted in criminal charges, prosecution or conviction; and the term "crime of violence motivated by gender" means a crime of violence committed because of gender or on the basis of gender, and due, at least in part, to an animus based on the victim's gender.

113. The above-described conduct of Mr. Combs, including, but not limited to, sexual assault, physical assault, threats, and false imprisonment, all conduct proscribed by PL 110/120.00(1), PL 120.15, PL 240.30(3), PL 135.05; PL 135.10 PI 130.52, PL 240.30(1)(a), PL 120.14(2), PL S 135.5(3), constitutes a “crime of violence” against Plaintiff and is a “crime of violence motivated by gender” as defined in § 10-1103.

114. Defendants Harve Pierre, Interscope Records, and Bad Boy Records have financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

115. Defendants Harve Pierre, Interscope Records, and Bad Boy Records enabled, condoned, had knowledge of, and failed to act to prevent or mitigate Mr. Combs’ commission of the abovementioned crimes of violence motivated by gender and are therefore also liable under the VGMVPL.

116. As a direct and proximate result of the above mentioned crimes of violence and gender-motivated violence, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress, entitling her to an award of compensatory and punitive damages, injunctive and declaratory relief, attorneys fees and costs, and other remedies as this Court may deem appropriate, as set forth in § 10-1104.

117. Pursuant to § 10-1105(a), this cause of action is timely because it is commenced within “two years and six months after September 1, 2022.”

SECOND CAUSE OF ACTION

**Sexual Assault pursuant to The California Sexual Abuse and
Cover Up Accountability Act, Cal. Civ. Proc. § 340.16
*Against Defendants Sean Combs & Bad Boy Records***

118. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

119. Mr. Combs subjected Plaintiff to sexual battery, as defined in Cal. Penal Code §§ 234.4(e)(1). In doing so, he intended to and did cause harmful and sexually offensive contact with their person and place them in imminent apprehension of such contact.

120. Pursuant to California Code of Civil Procedure § 340.16, as amended by Assembly Bill 2777, this cause of action is timely because it is commenced within three years of the date Plaintiff discovered the injuries resulting from Defendants' acts, which Plaintiff did not discover, and could not have reasonably discovered, until November 2023 when Ms. Ventura filed a lawsuit against Defendant.

121. Defendant Bad Boy Records has financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

122. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

123. Plaintiff also seeks reasonable attorneys' fees as provided under Cal. Civil Code § 52.5.

THIRD CAUSE OF ACTION

Forced Labor in Violation of 18 U.S.C. §§ 1589 and 1595
Against Defendants Sean Combs, Bad Boy Records & UMG Interscope Geffen A&M

124. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

125. Defendants knowingly obtained labor from Plaintiff through threats of serious harm, physical restraint, and other means of coercion, in violation of 18 U.S.C. § 1589.

126. Defendants Bad Boy Records, UMG Interscope Geffen A&M Records knowingly benefited from the forced labor and the trafficking activities conducted by Mr. Combs.

127. Under 18 U.S.C. § 1595, Plaintiff is entitled to bring a civil action against all Defendants for their violation of 18 U.S.C. § 1589.

128. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

129. Plaintiff seeks compensatory damages for the harm suffered as a result of Defendants' forced labor practices.

130. Plaintiff also seeks punitive damages to deter such conduct by Defendants in the future, along with reasonable attorney's fees and costs.

131. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

FOURTH CAUSE OF ACTION
Violation of New York Services for Victims of Human Trafficking, N.Y. Servs. Law
§ 483-bb(c)
Against Defendants Sean Combs & Bad Boy Records

132. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

133. Plaintiff is a victim of labor trafficking within the meaning of N.Y. Penal Law 135.35 and is therefore entitled to bring a civil action under N.Y. Soc. Serv. § 483-bb.

134. The Defendants' acts and omissions, taken separately and/or together, as outlined above, constitute a violation of N.Y. Soc. Serv. § 483-bb. Specifically, Defendant Sean Combs

perpetrated labor trafficking of Ms. Richard by inducing her to engage or continue to engage in labor activity by means of instilling a fear in her that, if she refused to comply, he would cause physical injury, serious physical injury, or engage in other conduct constituting a felony or unlawful imprisonment in the second degree in violation of New York Penal Law 135.05, and Defendant Bad Boy Records benefitted from Mr. Combs' venture by holding Ms. Richard, an artist signed with Defendant Bad Boy Records and otherwise employed by other Defendant Doe Corporations, captive to Mr. Combs' demands and desires. At all relevant times, Defendant Bad Boy Records participated in and facilitated the obtainment of Plaintiff's labor induced by force, fraud, or coercion.

135. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

136. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

FIFTH CAUSE OF ACTION
Sex Trafficking under 18 U.S.C. § 1591, et seq.
Against Defendant Sean Combs & Bad Boy Records

137. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

138. Mr. Combs, one of the most prominent musical artists and producers in the industry, recruited and enticed Plaintiff by initiating a professional relationship with her and inviting her to join his band *Diddy- Dirty Money* as a singer, songwriter, and performer. This opportunity instilled in Plaintiff the hope and expectation of advancing her career and achieving greater success in the music industry.

139. Mr. Combs, through a pattern of coercive threats and displays of brutal violence, caused Plaintiff to engage in commercial sex acts, as defined by 18 U.S.C. § 1591(e)(3). These acts were carried out to further Mr. Combs' financial gain from Ms. Richard's participation in *Diddy-Dirty Money*, to exert control over her, and to satisfy his own sexual gratification.

140. Mr. Combs used fraud and force to coerce and entice Ms. Richard into commercial sex acts. Mr. Combs did so by making threats of career derailment and promises of career advancement in exchange for Ms. Richard acquiescence to Mr. Combs' sexual batteries and assaults.

141. Mr. Combs acted with knowledge or in reckless disregard of the fact that Plaintiff was forced to engage in these acts through coercion and that these acts were in exchange for her continued place in the band and her financial stability.

142. Defendant Bad Boy Records has financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

143. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

144. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

SIXTH CAUSE OF ACTION
Violation of the California Trafficking Victims Protection Act,
Cal. Civil Code § 52.5
Against Defendants Sean Combs & Bad Boy Records

145. Plaintiff repeats and realleges each and every allegation contained in all of the preceding paragraphs as if fully set forth herein.

146. Plaintiff is a victim of trafficking within the meaning of Cal. Penal Code § 236.1 and is therefore entitled to bring a civil action under Cal. Civil Code § 52.5.

147. The Defendants' acts and omissions, taken separately and/or together, as outlined above, constitute a violation of Cal. Civ. Code § 52.5. Specifically, Defendant Sean Combs perpetrated human trafficking of Ms. Richard by depriving or violating her personal liberty with the intent to obtain forced labor, and Defendant Bad Boy Records benefitted from Mr. Combs' venture by holding Ms. Richard, an artist signed with Defendant Bad Boy Records and otherwise employed by other Defendant Doe Corporations, captive to Mr. Combs' demands and desires. At all relevant times, Defendants participated in and facilitated the obtainment of Plaintiff's labor induced by force, fraud, or coercion.

148. Defendant Bad Boy Records has financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

149. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

150. Pursuant to Cal. Civ. Code § 52.5(d)(3), Defendants' continuous death threats and coercion induced Plaintiff to delay the filing of this action and asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

151. Pursuant to Cal. Civ. Code § 52.5(d)(4), the suspension of the statute of limitations due to estoppel applies to all other related claims arising out of the trafficking situation, including but not limited to, Violation of The Victims of Gender-Motivated Violence Act, N.Y.C. Admin. Code §§ 10-1101, *et seq.*, Forced Labor in Violation of 18 U.S.C. §§ 1589 and 1595, New York Services for Victims of Human Trafficking, N.Y. Servs. Law § 483-bb(c), Sex Trafficking under

18 U.S.C. § 1591, Assault Under New York Law, Battery/Sexual Battery Under New York Law, False Imprisonment under New York Law, False Imprisonment under California Law, Intentional Infliction of Emotional Distress, Sexual Harassment, Gender Discrimination, and Hostile Work Environment under New York State Human Rights Law, N.Y. Exec. Law §§ 290, *et seq.*, Sexual Harassment, Gender Discrimination, and Hostile Work Environment under New York City Human Rights Law, N.Y. Exec. Law §§ 8-101, *et seq.*, Retaliation in Violation of New York State Human Rights Law, (“NYSHRL”) Section 296 and California Government Code Section 12940(h), Hostile Work Environment in violation of California Government Code §12940, Gender Discrimination in violation of California Government Code §12940, Violation of Right of Publicity Under New York Civil Rights Law § 50 and § 51, Unjust Enrichment, Copyright Infringement 17 U.S.C. § 106, Breach of Contract, Breach of Implied Covenant of Good Faith & Fair Dealing, Fraud, Intentional Misrepresentation, False Promise.

152. Pursuant to Cal. Civ. Code § 52.5(e), the running of the statute of limitations may be suspended as Plaintiff could not have reasonably discovered the cause of action due to circumstances resulting from the trafficking, including psychological trauma.

SEVENTH CAUSE OF ACTION
Assault Under New York Law
Against Defendants Sean Combs, & Bad Boy Records

153. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

154. In engaging in the conduct described above, Mr. Combs committed an assault against Plaintiff because he intentionally placed Plaintiff in reasonable apprehension of imminent harmful or offensive contact, and Plaintiff reasonably feared immediate bodily harm as a result of Defendant’s conduct. Defendant’s actions amount to violations under N.Y. Penal Law §§ 110/120.00(1), 120.15, as well as analogous California law and the common law of New York and California.

155. Defendant Bad Boy Records has financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

156. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

157. The conduct of Mr. Combs described above was willful, wanton, and malicious. At all relevant times, Mr. Combs acted with conscious disregard of Plaintiff's rights and feelings, acted with the knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and exemplary damages from Defendant Combs according to proof at trial.

158. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

EIGHTH CAUSE OF ACTION
Battery/Sexual Battery Under New York Law
Against Defendants Sean Combs & Bad Boy Records

159. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

160. In engaging in the conduct described above, Mr. Combs committed a battery against Plaintiff because he intentionally engaged in unlawful, intentional, and offensive touching or application of force to Plaintiff's person. Mr. Combs repeatedly and without consent touched Ms. Richard's body including her buttocks and chest area. Defendant's actions amount to violations under N.Y. Penal Law §§ 150.50, 130.52, 130.55, and 130.65, as well as analogous California law and the common law of New York and California.

161. Defendant Bad Boy Records has financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

162. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

163. The above-described conduct by Mr. Combs was willful, wanton, and malicious. At all relevant times, Mr. Combs acted with conscious disregard of Ms. Richard's rights and feelings, acted with the knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or humiliation to Ms. Richard, and intended to cause fear, physical injury, and/or pain and suffering to Ms. Richard. By virtue of the foregoing, Ms. Richard is entitled to recover punitive and exemplary damages from Mr. Combs according to proof at trial.

164. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

NINTH CAUSE OF ACTION
False Imprisonment under New York Law
Against Defendants Sean Combs, Harve Pierre & Bad Boy Records

165. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

166. Defendants Mr. Combs and Mr. Pierre falsely imprisoned Plaintiff in New York as alleged in this Complaint, by suddenly and without provocation, willfully and maliciously falsely imprisoning Ms. Richard against her will in the Defendants' corporate vehicle for over two hours.

167. Following Plaintiff's false imprisonment in the Defendants' corporate vehicle, Defendant Mr. Combs issued a clear retaliatory threat of future injury and bodily harm to Plaintiff, underscoring the intent to both control and to silence Plaintiff as to Defendant's crimes.

168. Defendant Bad Boy Records has financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

169. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

170. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

TENTH CAUSE OF ACTION
False Imprisonment under California Law
Against Defendants Sean Combs & Bad Boy Records

171. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

172. Defendant Mr. Combs falsely imprisoned Ms. Richard in California as alleged in this Complaint, by demanding, under false pretenses, that Ms. Richard appear for work, and subsequently, willfully and maliciously falsely imprisoning and threatening Ms. Richard in Mr. Combs' home studio against her will for over twenty minutes.

173. Following Plaintiff's false imprisonment in Mr. Combs' home studio, Defendant Mr. Combs issued a clear retaliatory threat of future injury and bodily harm to Plaintiff, underscoring the intent to both control and to silence Plaintiff as to Defendant's crimes.

174. Defendant Bad Boy Records has financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

175. As a direct and proximate result of Defendants' actions, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

176. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

ELEVENTH CAUSE OF ACTION
Intentional Infliction of Emotional Distress
Against Defendants Sean Combs, Harve Pierre & Bad Boy Records

177. Plaintiff repeats and re-alleges each and every allegation set forth in all of the preceding paragraphs as if fully set forth herein.

178. Defendants Sean Combs and Harve Pierre's conduct, which included abuse, death threats, sexual assault, false imprisonment, deprivation of basic necessities in the workplace, nonpayment or underpayments, and labor violations was extreme and outrageous, going beyond all possible bounds of decency and utterly intolerable in a civilized community.

179. Defendants' conduct was intentional and reckless and Defendants knew or should have known that such conduct would cause Plaintiff severe emotional distress.

180. Defendants Harve Pierre and Bad Boy Records have financially and otherwise benefited from these acts and omissions by keeping Mr. Combs, the volatile and explosive owner of Bad Boy Records, satisfied, and benefited from facilitating his behavior.

181. Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

182. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

TWELFTH CAUSE OF ACTION
Sexual Harassment, Gender Discrimination, and Hostile Work Environment under
New York State Human Rights Law, N.Y. Exec. Law §§ 290, et seq. ("NYSHRL")
Against Defendants Sean Combs & Bad Boy Records

183. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

184. Defendants Sean Combs and Bad Boy Records discriminated against Plaintiff on the basis of her gender in violation of the NYSHRL by subjecting Plaintiff to disparate treatment, verbal abuse, systematic exclusion, failure to address complaints of discrimination and/or harassment, retaliation, derogatory gender-based slurs and comments, insults and offensive gender-based language, intimidation and bullying, threats, unfair treatment, and denial of opportunities, promotions, or benefits based on gender.

185. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of the NYSHRL, Plaintiff has sustained and will continue to sustain, monetary and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

186. Defendants' unlawful and discriminatory actions were intentional, done with malice and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights under the NYSHRL for which Plaintiff is entitled to an award of punitive damages.

187. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendant should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

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THIRTEENTH CAUSE OF ACTION
Sexual Harassment, Gender Discrimination, and Hostile Work Environment under
New York City Human Rights Law, N.Y. Exec. Law §§ 8-101, et seq. (“NYCHRL”)
Against Defendants Sean Combs & Bad Boy Records

188. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

189. Defendant Sean Combs and Bad Boy Records discriminated against Plaintiff on the basis of her gender in violation of the NYCHRL by subjecting Plaintiff to unwanted touching of her intimate parts, forcing Plaintiff to endure derogatory name-calling, and exposing Plaintiff to sex trafficking and sex acts, constituting a hostile work environment. Defendants engaged in a pattern of criminal conduct in the workplace that created an offensive, intimidating, and hostile atmosphere for Plaintiff based on her gender.

190. As a direct and proximate result of Defendants’ unlawful discriminatory conduct in violation of the NYCHRL, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

191. Defendants’ unlawful and discriminatory actions were intentional, done with malice and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff’s rights under the NYCHRL for which Plaintiff is entitled to an award of punitive damages.

192. Defendants’ continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

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FOURTEENTH CAUSE OF ACTION
Retaliation in Violation of New York State Human Rights Law, (“NYSHRL”)
Section 296 and California Government Code Section 12940(h).
Against Defendants Sean Combs & Bad Boy Records

193. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

194. Plaintiff engaged in protected activity by rejecting Defendant’s sexual advances, which constitutes opposition to unlawful sexual harassment under New York State Human Rights Law (NYSHRL), Section 296. This rejection is protected activity under NYSHRL and California Government Code, as it opposes discriminatory conduct in the workplace.

195. Defendants Sean Combs and Bad Boy Records’ persistent denial of prominent or continuing singing/writing/performing roles as to Plaintiff constitutes adverse employment actions. Plaintiff’s rejection of Combs’ sexual advances subjected her to an increasingly hostile work environment based on her gender. These actions materially and detrimentally affected Plaintiff’s terms and conditions of employment, and were in direct response to Plaintiff’s protected activity of rejecting Defendant’s sexual advances.

196. Further, Defendants’ failure to pay Ms. Richard earned wages, royalties, and concert and promotional appearance fees according to contracts and other promises constitute adverse employment actions based on gender and were done in retaliation by Defendants.

197. There is a direct causal connection between Plaintiff’s protected activity and Defendants’ adverse employment action. The timing and circumstances indicate Defendant’s retaliatory motives.

198. As a direct and proximate result of Defendants’ retaliation, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

199. Defendants' unlawful and retaliatory actions were intentional, done with malice and/or showed a deliberate, willful, wanton and reckless indifference to Plaintiff's rights under the NYSHRL for which Plaintiff is entitled to an award of punitive damages.

200. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

FIFTEENTH CAUSE OF ACTION
Hostile Work Environment in violation of California Government Code §12940
Against Defendants Sean Combs & Bad Boy Records

201. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

202. Defendants Sean Combs and Bad Boy Records subjected Plaintiff to sexual harassment on the basis of her gender in violation of California Government Code § 12940, including unwanted touching of her intimate parts, forcing Plaintiff to endure derogatory name-calling, and exposing Plaintiff to sex trafficking and sex acts, all of which constituted a hostile work environment.

203. The conduct of Defendants Sean Combs and Bad Boy Records created an intimidating, hostile, and offensive working environment in violation of California Government Code §12923.

204. As a direct and proximate result of Defendants' unlawful conduct in violation of Cal. Gov. Code § 12940, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

205. Defendants' unlawful and discriminatory actions were intentional, done with malice and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights under Cal. Gov. Code § 12940 for which Plaintiff is entitled to an award of punitive damages.

206. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

SIXTEENTH CAUSE OF ACTION
Gender Discrimination in violation of California Government Code §12940
Against Defendants Sean Combs & Bad Boy Records

207. Plaintiff repeats and re-alleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

208. Defendants Sean Combs and Bad Boy Records discriminated against Plaintiff on the basis of her gender in violation of California Government Code § 12940 by subjecting Plaintiff to disparate treatment, verbal abuse, systematic exclusion, failure to address complaints of discrimination and/or harassment, retaliation, derogatory gender-based slurs and comments, insults and offensive gender-based language, intimidation and bullying, threats, unfair treatment, and denial of opportunities, promotions, or benefits based on her gender.

209. As a direct and proximate result of Defendants' unlawful discriminatory conduct in violation of Cal. Gov. Code § 12940, Plaintiff has sustained and will continue to sustain, monetary damages and/or economic harm, physical injury, pain and suffering, and serious psychological and emotional distress.

210. Defendants' unlawful and discriminatory actions were intentional, done with malice and/or showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights under Cal. Gov. Code § 12940 for which Plaintiff is entitled to an award of punitive damages.

211. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

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SEVENTEENTH CAUSE OF ACTION

Violation of Right of Publicity Under New York Civil Rights Law

§ 50 and § 51 and Unjust Enrichment

Against Defendants Sean Combs, Bad Boy Records, Universal Music Group NV, Interscope Geffen A&M Records, Diageo Americas Supply Inc. d/b/a Ciroc Distilling Company d/b/a Ciroc Canning Co., Combs Wines and Spirits LLC

212. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

213. Mr. Combs required Ms. Richard to perform at and attend numerous promotional events as part of *Diddy – Dirty Money*, including late or overnight parties which were under contract between Mr. Combs and CIROC Vodka, or were between Mr. Combs and DiddyBeats pursuant to the aforementioned deal between Bad Boy Records and Interscope Records.

214. Defendants knowingly used Plaintiff’s voice, likeness, image, and persona without Plaintiff’s consent for advertising and promotion purposes and for the purpose of trade.

215. Defendants have been unjustly enriched at Plaintiff’s expense by using Plaintiff’s voice, image, likeness, and persona without compensating Plaintiff.

216. It would be inequitable for Defendant to retain the benefit conferred by the unauthorized use of Plaintiff’s voice, image, likeness, and persona.

217. As a result of Defendants’ unauthorized use of Plaintiff’s likeness, image, and persona, Plaintiff has suffered damages and is entitled to restitution in an amount to be determined at trial.

218. Defendants’ continuous death threats and coercion prevented Plaintiff from asserting her rights. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

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EIGHTEENTH CAUSE OF ACTION

Copyright Infringement

17 U.S.C. § 106

Against Defendants Sean Combs, Bad Boy Records & Love Records, Inc.

219. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

220. Plaintiff wrote, created and performed on the music composition and sound recording of the song *Deliver Me* in 2009, as included on Defendants' 2023 released album *The Love Album: Off the Grid*.

221. The composition and recording of *Deliver Me* was published by Defendants absent agreement on terms; thus, Defendants have no signed or enforceable agreement with Plaintiff. Plaintiff registered the musical composition and sound recording pertinent thereto with the Register of Copyrights and received the certificate of registration therefor. Plaintiff owns copyrights in the musical composition, rights of performance therein, and the exclusive rights to reproduce and distribute to the public by sale or other transfer of ownership, or by lease, lending or license, reproductions of the copyrighted works under Copyright Act, 17 U.S.C. § 106.

222. Plaintiff is informed and believes and thereon alleges that on September 14-15, 2023, and continuing to the present, Defendants, and each of them, knowingly and willfully and without securing Plaintiff's permission or license: embodied, adapted, used, reproduced, marketed, distributed and sold Plaintiff's copyrighted material on *Deliver Me* as affixed in the Defendants' album *The Love Album: Off the Grid*.

223. Accordingly, Plaintiff alleges her claim for copyright infringement based on each Defendant's publication of *Deliver Me* as Plaintiff's copyrighted musical composition without license, permission or approval.

224. Each Defendant unquestionably had access to Plaintiff's work through Defendants previous companies, Bad Boy Records, et al. or other of Defendants' holders of recorded

compositions, and each Defendant knowingly and willfully ratified and confirmed said access thereafter.

225. In undertaking the conduct complained of in this action, Defendants knowingly and intentionally violated Plaintiff's rights.

226. At no time did Plaintiff authorize Defendants to use, license, own, reproduce, adapt or distribute Plaintiff's copyrighted material. At the times of the acts of infringement complained of, Plaintiff was and is the owner of the copyright in the music composition identified and named above.

227. After the respective dates of first publication and continuing to the present, the Defendants, and each of them, have infringed and continue to infringe Plaintiff's copyrights in the music composition by reproducing or causing, contributing to, and participating in the unauthorized reproduction of the copyrighted music composition and by causing, contributing to, and participating in the distribution of the unauthorized reproductions of the music composition as recorded to the public.

228. Despite their actual or constructive knowledge through their individual and collective recording industry experience and knowledge of copyright laws, enforcement of intellectual property rights in other instances and their duties to view and examine licenses for uses of copyrighted works, Defendants have used and promoted and continue to use and promote, reproduce and to enable others to reproduce Plaintiff's copyrighted music composition in its complete or substantial entirety as and for the commercial profit of Defendants without any ongoing payment to or authorization by Plaintiff (i.e. no accountings have been received).

229. As a direct and proximate result of the Defendants' knowing and willful infringing use of the copyrights, Plaintiff has sustained and will continue to sustain substantial injury, loss and damage to her ownership, publishing and performance rights in her music composition, which is copyrighted material.

230. As a result of all of Defendants' joint, several, willful and deliberate acts of copyright infringement, Plaintiff is further entitled to recover from Defendants all of the damages sustained by Plaintiff permitted by federal copyright law, including but not limited to compensatory damages and the profits derived by Defendants as a result of their infringing acts, in an amount to be determined according to proof at trial.

231. Plaintiff is further entitled to recover from Defendants the gains, profits and advantages Defendants, and each of them, have obtained as a result of their acts of copyright infringement.

232. Plaintiff is entitled to the maximum statutory damages which copyright registration confers upon a copyright owner, pursuant to 17 U.S.C. §504(c), in the amount of \$150,000.00 with respect to each Defendant for each work infringed, or for such other amounts as may be proper under 17 U.S.C. §504(c).

NINETEENTH CAUSE OF ACTION

Breach of Contract

Against Defendants Sean Combs, Bad Boy Records, The Sean Comb Music Inc, The Nordlinger Group LLC, November 15, LLC, Janice Combs Publishing Inc & Sony Songs

233. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

234. Under the initial Participant Agreement signed by Plaintiff in 2005 with Defendant Remote Productions Inc., on information and belief, a company owned by Sean Combs, Plaintiff was promised transportation to and from venues, adequate meals, rest and sleep, medical care and impliedly, safety from a hostile workplace. Despite that Plaintiff fulfilled all of her duties and beyond, Defendants breached its duty to provide these basic remunerations. Defendants also failed to pay salary, royalties, profit participation, promotions, and touring to Plaintiff.

235. In late 2007, Plaintiff signed The Performer Agreement with Defendant Remote Productions, Inc. which promised minimum compensation to Plaintiff of \$4,000 per episode of

Making The Band, travel and transportation costs, promotions pay at \$3,000 per episode after 6 free, \$250 per day for voiceovers or remixes, and performance rights. Despite Plaintiff's working overtime and double-time, wages or other promised compensation was withheld at least 80% of the time.

236. Defendant Bad Boy Records, LLC, naming itself as successor-in-interest to Remote Productions, Inc, and Plaintiff signed an agreement entitled The Danity Kane Letter Amendment [the "DK Letter"] in late 2007. The DK Letter promised Plaintiff approval rights, advances, concert remuneration, royalties at 12.5% payable by Defendant The Nordlinger Group and/or November 15, LLC. Such payments were not made in accordance with contract, if at all, despite demands to Defendants' attorneys.

237. Defendants not only breached terms of the agreements listed above, but additionally breached the implied covenants of an employer-employee relationship by acting in bad faith and unfairly frustrating Plaintiff's right to receive the benefits of the agreements actually made.

238. Plaintiff entered a contract with Defendants "The Sean Comb Music, Inc." on January 1, 2009, promising payment to Plaintiff of 12.5% on sound recording masters in the US and 10% of Net Tour Revenues or 5% per performance; Plaintiff was required to exclusively license her music compositions to Defendants and assign the publishing administration to Defendants.

239. On information and belief, at an unknown point in time, Defendant The Sean Comb Music Inc. assigned its publishing administration to Janice Combs Publishing, Inc. and such administration rights are alleged to be held by Janice Combs Publishing Holdings Inc.

240. On July 1, 2021, Defendants Janice Combs Publishing Inc. granted exclusive administration rights in Plaintiff's compositions to Sony Songs, a division of Sony Music Publishing LLC. Plaintiff signed her assent to the assignment on October 22, 2021. The

assignment provided that Plaintiff would receive 90% of publisher's share of performance income, 80% of synchronization income and 90% of all other income.

241. Since a music publisher owes a duty to a writer to account to the writer for royalties earned, each of the Defendants named in this count have wholly failed to provide accountings, statements, payments nor validly register, administer, exploit or oversee the Plaintiff's copyrights they were entrusted with via the contracts and thereby breached the contracts with Plaintiff.

242. Plaintiff provided her talent as a singer, writer, performer, dancer and recording artist. Defendants received significant benefits and compensation from Plaintiff's services. Yet none of the wages, royalties, publishing, touring, promotional fees and other profits promised by Defendants were paid as agreed; conversely, Defendants routinely refused to pay despite Plaintiff's requests, nor was Plaintiff made whole at any time.

243. Defendants' failure to perform the required duties set forth in the terms and conditions of the contracts was foreseeable in causing Plaintiff to suffer general, consequential and incidental damages, including economic damages. Defendants' conduct is a breach of contract.

244. As an actual and proximate result of Defendants' unlawful and unconscionable conduct in breaching its fiduciary duties, Plaintiff has lost wages, profits, benefits, royalties, and has incurred other out of pocket expenses.

245. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

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TWENTIETH CAUSE OF ACTION
Breach of Implied Covenant of Good Faith & Fair Dealing
Against All Defendants

246. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

247. Plaintiff entered several contracts with Defendants.

248. Plaintiff did all, or substantially all of the significant things the contracts required her to do.

249. The allegations set forth in this complaint detail the malevolent and intentional behavior by Defendants repeated throughout a 20 year span, all of which constitute breaches of the implied covenant of good faith and fair dealing and demonstrate the bad faith of Defendants at all relevant times.

250. Defendants did not pay Plaintiff her salary as agreed.

251. Defendants did not pay Plaintiff her royalties, nor extraneous promotions in any instance.

252. Defendants did not pay Plaintiff her share of income for her contributions to musical compositions, her publishing, as agreed, despite the assignments to various companies.

253. Not only have Defendants failed to pay Plaintiff, they have failed to promote Plaintiff's works, and infringed her copyrights.

254. Defendants' unfair interference with Plaintiff's right to receive the benefits of each contract was foreseeable in causing Plaintiff to suffer general, consequential and incidental damages, including economic damages according to proof at trial.

255. Defendants knew or could reasonably have foreseen that the harm and/or special circumstances were likely to occur in the ordinary course of events as a result of the breaches of Defendants' obligations to act in good faith, make Plaintiff's property productive and account for

and pay Plaintiff as agreed. Accordingly, Defendants' conduct was a breach of implied covenant of good faith and fair dealing.

256. As an actual and proximate result of the aforementioned violations, Plaintiff has been harmed in an amount according to proof, and has lost wages, benefits, and other out of pocket expenses.

257. As an actual and proximate result of Defendants' aforementioned acts, Plaintiff has suffered physical injury and became mentally upset, stressed and aggravated. Plaintiff has experienced post-traumatic stress disorder, mental anguish, aggravation, anxiety, humiliation, embarrassment, sleeplessness, loss of appetite, low self-esteem, depression, upset stomach, and other forms of extreme emotional distress. Plaintiff claims damages for physical injuries and mental distress in an amount according to proof at trial.

258. The above-described actions were perpetrated and/or ratified by a managing agent, employee or officer of Defendants, and each of them. These acts were done with malice, fraud, oppression and in reckless disregard of Plaintiff's rights. Further, said actions were despicable in character and warrant the imposition of punitive damages in a sum sufficient to punish and deter Defendants' future conduct.

259. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

TWENTY FIRST CAUSE OF ACTION
Fraud / Intentional Misrepresentation / False Promise
Against All Defendants

260. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

261. Plaintiff asserts this cause of action against all Defendants.

262. Defendants represented to Plaintiff that certain facts relative to payments to Plaintiff were true in each of the contracts above-listed. Further, Defendants made multiple promises in writing to Plaintiff.

263. Defendants' representations were false; Defendants did not intend to perform these promises when they were made or at any time.

264. Defendants knew that their representations were false when they were made and they made such representations recklessly and without regard for the truth in such representations.

265. Defendants intended that Plaintiff rely on their representations and promises.

266. Plaintiff reasonably relied on Defendants' representations and promises.

267. Defendants did not perform the promised acts.

268. Plaintiff was harmed.

269. Plaintiff's reliance on Defendants' representations and promises was a substantial factor in causing Plaintiff to suffer general, consequential and incidental damages, including economic damages according to proof at trial. Defendants knew or could reasonably have foreseen that the harm and special circumstances were likely to occur in the ordinary course of events as a result of the Defendants' breaches of contracts. Accordingly, Defendants' conduct was intentional misrepresentation.

270. As an actual and proximate result of Defendants' intentional and unlawful misrepresentation and false promises, Plaintiff has lost wages, profits, benefits, royalties, and has incurred other out of pocket expenses.

271. As an actual and proximate result of Defendants' fraudulent acts, Plaintiff has suffered physical injury and became mentally upset, stressed and aggravated. Plaintiff has experienced post-traumatic stress disorder, mental anguish, aggravation, anxiety, humiliation, embarrassment, sleeplessness, loss of appetite, low self-esteem, depression, upset stomach, and

other forms of extreme emotional distress. Plaintiff claims damages for physical injuries and mental distress in an amount according to proof at trial.

272. The above-described actions were perpetrated and/or ratified by a managing agent, employee or officer of Defendants, and each of them. These acts were done with malice, fraud, oppression and in reckless disregard of Plaintiff's rights. Further, said actions were despicable in character and warrant the imposition of punitive damages in a sum sufficient to punish and deter Defendants' future conduct.

273. Defendants' continuous death threats and coercion prevented Plaintiff from asserting her rights within the statutorily proscribed period. Defendants should be estopped from asserting the statute of limitations as a defense due to the duress exerted upon Plaintiff.

PRAYER FOR RELIEF ON CLAIMS

WHEREFORE, Ms. Richard prays that this Court enter judgment against Defendants herein and any other Defendants who may later be added to this action as follows:

1. For a money judgment representing compensatory damages, including but not limited to: consequential damages, lost wages, earning, royalties, publishing, touring and promotional income, and non-economic damages, and all other sums of money, together with interest on these amounts, according to proof;
2. For a money judgment for mental pain and anguish and severe emotional distress, according to proof;
3. For restitution;
4. For disgorgement of all sums unjustly obtained from Plaintiff or inured to the benefit of Defendants;
5. For civil penalties;
6. For punitive and exemplary damages according to proof;

7. For attorneys' fees and costs;
8. For prejudgment and post-judgment interest; and
9. For such other and further relief as the Court may deem just and proper.

JURY DEMAND

1. Ms. Richard demands a trial by jury on all issues triable of right by jury.

DATED: September 10, 2024
New York, New York

Respectfully submitted,

THE BLOOM FIRM

By: *Lisa Bloom*

Lisa Bloom
Arick Fudali
Yasmine Meyer
Devin Meepos

Attorneys for Ms. Richard

IP LEGAL STUDIO LLC

By: /s/ Lisa A. Cervantes

Lisa A. Cervantes
Attorneys for Ms. Richard

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SEAN COMBS,
a/k/a "Puff Daddy,"
a/k/a "P. Diddy,"
a/k/a "Diddy,"
a/k/a "PD,"
a/k/a "Love,"

Defendant.

SEALED INDICTMENT

24 Cr.

24 CRIM 542

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

Overview

1. For decades, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, abused, threatened, and coerced women and others around him to fulfill his sexual desires, protect his reputation, and conceal his conduct. To do so, COMBS relied on the employees, resources, and influence of the multi-faceted business empire that he led and controlled—creating a criminal enterprise whose members and associates engaged in, and attempted to engage in, among other crimes, sex trafficking, forced labor, kidnapping, arson, bribery, and obstruction of justice.

2. SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, operated his business, headquartered at various times in Manhattan and Los Angeles, under a variety of United States-based corporate entities, including Bad Boy

Entertainment, Combs Enterprises, and Combs Global (collectively, the “Combs Business”). Corporate entities in the Combs Business included, among other things, record labels, a recording studio, an apparel line, an alcoholic spirits business, a marketing agency, and a television network and media company.

3. At all times relevant to this Indictment, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, engaged in a persistent and pervasive pattern of abuse toward women and other individuals. This abuse was, at times, verbal, emotional, physical, and sexual. As part of his pattern of abuse, COMBS manipulated women to participate in highly orchestrated performances of sexual activity with male commercial sex workers. At times, COMBS, and others acting at his direction, made arrangements for women and commercial sex workers to fly to COMBS’ location. COMBS ensured participation from the women by, among other things, obtaining and distributing narcotics to them, controlling their careers, leveraging his financial support and threatening to cut off the same, and using intimidation and violence.

4. Physical abuse by SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, was recurrent and widely known. On numerous occasions from at least in or about 2009 and continuing for years, COMBS assaulted women by, among other things, striking, punching, dragging, throwing objects at, and kicking them. These assaults were, at times, witnessed by others and included one instance at a Los Angeles hotel in or about March 2016, which was captured on video and later publicly reported, where COMBS kicked, dragged, and threw a vase at a woman as she was attempting to leave. When a member of the hotel security staff intervened, COMBS attempted to bribe the staff member to ensure silence.

COMBS' violence was also not limited to these women. It extended to his employees, witnesses to his abuse, and others.

5. SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, used the Combs Business, including certain employees, to carry out, facilitate, and cover up his abuse and commercial sex. Those employees—including security staff, household staff, personal assistants, and high-ranking supervisors—and other close associates acted as COMBS' intermediaries, and their conduct was facilitated and assisted by COMBS' control of the Combs Business.

The Combs Enterprise

6. From at least in or about 2008, through on or about the date of the filing of this Indictment, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, and others known and unknown, were members and associates of a criminal organization (the "Combs Enterprise" or the "Enterprise"). Members and associates of the Combs Enterprise engaged in, and attempted to engage in, among other activities, sex trafficking, forced labor, interstate transportation for purposes of prostitution, coercion and enticement to engage in prostitution, narcotics offenses, kidnapping, arson, bribery, and obstruction of justice.

7. The Combs Enterprise, including its leadership, its members, and its associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Combs Enterprise consisted of: (i) SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant; (ii) entities within the Combs Business, including but not limited to Bad

Boy Entertainment, Combs Enterprises, and Combs Global; (iii) individuals employed by and associated with the Combs Business; and (iv) others known and unknown.

8. The Combs Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Combs Enterprise. The Combs Enterprise was engaged in, and its activities affected, interstate and foreign commerce. The Combs Enterprise operated in the Southern District of New York and elsewhere.

9. At all times relevant to this Indictment, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, was the leader of the Combs Enterprise.

10. SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, and others known and unknown, participated in unlawful and other activities related to the conduct of the Combs Enterprise’s affairs. These individuals included certain Combs Business employees, such as members of COMBS’ security staff, household staff, personal assistants, and high-ranking supervisors, as well as other close associates of COMBS.

Purposes of the Combs Enterprise

11. The purposes of the Combs Enterprise included the following:

a. Operating a global business in the media, entertainment, and lifestyle industries, including, among other things, record labels, a recording studio, an apparel line, an alcoholic spirits business, a marketing agency, and a television network and media company;

b. Preserving, protecting, promoting, and enhancing the power, reputation, and brand of SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, as a musician, entrepreneur, and figure in the entertainment industry;

c. Enriching members and associates of the Enterprise, including its leader, COMBS, and in particular those who demonstrated loyalty to COMBS and willingness to conceal his crimes;

d. Preserving, protecting, promoting, and enhancing the power of the Combs Enterprise, including the power of its leader, COMBS, through violence, use of firearms, threats of violence, coercion, and verbal, emotional, physical, and sexual abuse;

e. Fulfilling the personal desires of COMBS, particularly those related to COMBS' sexual gratification, including through the exploitation of women and the use of commercial sex workers;

f. Enabling COMBS and other members and associates of the Combs Enterprise to engage in unlawful acts of violence, including sexual violence; sex trafficking; forced labor; interstate transportation for purposes of prostitution; coercion and enticement to engage in prostitution; narcotics distribution; and other crimes, and concealing the commission of such acts;

g. Securing absolute loyalty from members of the Combs Enterprise, including through acts of violence and threats; and

h. Protecting the Combs Enterprise and its members and associates, including COMBS, from detection and prosecution by law enforcement authorities through acts of intimidation, manipulation, bribery, and threats of retaliation against individuals who witnessed the crimes committed by members and associates of the Enterprise.

Means and Methods of the Enterprise

12. Among the means and methods by which SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, and other members and

associates of the Combs Enterprise conducted and participated in the conduct of the affairs of the Combs Enterprise included the following:

a. COMBS, and other members and associates of the Combs Enterprise, wielded the power and prestige of COMBS' role at the Combs Business to intimidate, threaten, and lure female victims into COMBS' orbit, often under the pretense of a romantic relationship. COMBS then used force, threats of force, and coercion, to cause victims to engage in extended sex acts with male commercial sex workers that COMBS referred to as, among other things, "Freak Offs." Freak Offs were elaborate and produced sex performances that COMBS arranged, directed, masturbated during, and often electronically recorded. In arranging these Freak Offs, COMBS, with the assistance of members and associates of the Combs Enterprise, transported, and caused to be transported, commercial sex workers across state lines and internationally. Freak Offs occurred regularly, sometimes lasted multiple days, and often involved multiple commercial sex workers. During Freak Offs, COMBS distributed a variety of controlled substances to victims, in part to keep the victims obedient and compliant. Sometimes unbeknownst to the victims, COMBS kept videos he filmed of victims engaging in sex acts with commercial sex workers. After Freak Offs, COMBS and the victims typically received IV fluids to recover from the physical exertion and drug use.

b. Members and associates of the Combs Enterprise, including high-ranking supervisors, security staff, household staff, personal assistants, and other Combs Business employees, facilitated the Freak Offs by, among other things, booking hotel rooms for the Freak Offs; stocking the hotel rooms in advance with the required Freak Off supplies, including controlled substances, baby oil, lubricant, extra linens, and lighting; cleaning the hotel rooms after the Freak Offs to try to mitigate room damage; arranging for travel for victims, commercial sex

workers, and COMBS to and from Freak Offs; resupplying COMBS with requested supplies; delivering large sums of cash to COMBS to pay the commercial sex workers; and scheduling the delivery of IV fluids. In or about March 2024, during searches of COMBS' residences in Miami, Florida and Los Angeles, California, law enforcement seized various Freak Off supplies, including narcotics and more than 1,000 bottles of baby oil and lubricant.

c. COMBS subjected victims to physical, emotional, and verbal abuse to cause the victims to engage in Freak Offs. COMBS maintained control over his victims through, among other things, physical violence, promises of career opportunities, granting and threatening to withhold financial support, and by other coercive means, including tracking their whereabouts, dictating the victims' appearance, monitoring their medical records, controlling their housing, and supplying them with controlled substances. During and separate from Freak Offs, COMBS, among other things, hit, kicked, threw objects at, and dragged victims, at times, by their hair. These assaults often resulted in injuries that took days or weeks to heal. COMBS also threatened victims' careers and livelihoods, including if they resisted participating in Freak Offs. Victims believed they could not refuse COMBS' demands without risking their financial or job security or without repercussions in the form of physical or emotional abuse. COMBS also used the sensitive, embarrassing, and incriminating recordings that he made during Freak Offs as collateral to ensure the continued obedience and silence of the victims.

d. Members and associates of the Combs Enterprise, including COMBS' security personnel, at times carried firearms. On more than one occasion, COMBS himself carried or brandished firearms to intimidate and threaten others, including victims of and witnesses to his abuse. In or about March 2024, during searches of COMBS' residences in Miami, Florida and

Los Angeles, California, law enforcement seized firearms and ammunition, including three AR-15s with defaced serial numbers, as well as a drum magazine.

e. Members and associates of the Combs Enterprise enabled COMBS' control over victims by following his directions regarding financial payments to victims, advancing or suppressing the victims' career opportunities, and acquiring the controlled substances COMBS used to keep the victims compliant. Members and associates of the Combs Enterprise at times witnessed COMBS' violence toward the victims, or the victims' injuries caused by Combs, without intervening. Instead, members and associates of the Combs Enterprise helped conceal the violence and abuse by, among other things, assisting COMBS in monitoring and preventing victims from leaving locations, such as hotels or COMBS' residences. These occasions included instances in which a victim was required to remain in hiding—sometimes for several days at a time—to recover from injuries COMBS inflicted, without being publicly observed. Members and associates of the Combs Enterprise also assisted COMBS in locating and contacting victims who attempted to flee his abuse.

f. When employees, witnesses to his abuse, or others threatened COMBS' authority or reputation, COMBS and members and associates of the Enterprise engaged in acts of violence, threats of violence, threats of financial and reputational harm, and verbal abuse. These acts of violence included kidnapping and arson. In addition, on multiple occasions, COMBS threw both objects and people, as well as hit, dragged, choked, and shoved others.

g. When COMBS' authority or reputation was threatened by the possibility of negative publicity or legal or law enforcement action against him, including in or about late 2023 following public allegations of COMBS' crimes, COMBS and members and associates of the Enterprise pressured witnesses and victims, including through attempted bribery, to stay silent and

not report what they experienced or knew to law enforcement. On phone calls, COMBS and other members and associates of the Enterprise, among other things, provided these victims and witnesses with a false narrative of events in an effort to conceal COMBS' crimes. COMBS caused these calls to be recorded on at least two occasions.

The Racketeering Conspiracy

13. From at least in or about 2008, through on or about the date of the filing of this Indictment, in the Southern District of New York and elsewhere, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, and others known and unknown, being persons employed by and associated with the Combs Enterprise described in paragraphs 6 through 12 of this Indictment, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Combs Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

a. multiple acts involving kidnapping, chargeable under the following provisions of state law: California Penal Code § 207 (kidnapping), California Penal Code §§ 21(a), 664 (attempt), California Penal Code § 31 (aiding and abetting), and California Penal Code § 182 (conspiracy);

b. multiple acts involving arson, chargeable under the following provisions of state law: California Penal Code § 451 (arson), California Penal Code §§ 21(a), 664 (attempt), California Penal Code § 31 (aiding and abetting), and California Penal Code § 182 (conspiracy);

c. multiple acts involving bribery, chargeable under the following provisions of state law: California Penal Code § 137(a) (bribery of a witness), California Penal Code §§ 21(a), 664 (attempt), California Penal Code § 31 (aiding and abetting), and California Penal Code § 182 (conspiracy);

d. multiple acts indictable under Title 18, United States Code, Section 1512 (relating to tampering with a witness, victim, or an informant);

e. multiple acts indictable under Title 18, United States Code, Sections 1589 and 2 (relating to forced labor);

f. multiple acts indictable under Title 18, United States Code, Sections 1591 and 2 (relating to sex trafficking);

g. multiple acts indictable under Title 18, United States Code, Sections 2421, 2422, and 2 (relating to transportation and inducement to travel for purposes of prostitution and other illegal sexual activities); and

h. multiple offenses involving the possession with intent to distribute, or distribution of narcotics and controlled substances, including cocaine, oxycodone, alprazolam, 3,4-Methylenedioxyamphetamine, 4-Bromo-2,5-dimethoxyphenethylamine, gamma hydroxybutyric acid, and ketamine, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), (b)(1)(E), (b)(2), and 846 (distribution and possession with intent to distribute and conspiracy to do the same), and Title 18, United States Code, Section 2 (aiding, abetting, and willfully causing).

14. It was a part of the conspiracy that SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, agreed that a conspirator would

commit at least two acts of racketeering activity in the conduct of the affairs of the Combs Enterprise.

Notice of Special Sentencing Factor

15. From at least in or about 2009, up to and including in or about 2018, in the Southern District of New York and elsewhere, as part of his agreement to conduct and participate in the conduct of the affairs of the Combs Enterprise through a pattern of racketeering activity, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, agreed to, in and affecting interstate and foreign commerce, knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Sex Trafficking by Force, Fraud, or Coercion)
(Victim-1)

The Grand Jury further charges:

16. From at least in or about 2009, up to and including in or about 2018, in the Southern District of New York and elsewhere, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United

States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and attempted, aided and abetted, and willfully caused the same, to wit, COMBS recruited, enticed, harbored, transported, and maintained a person (“Victim-1”), and attempted, aided and abetted, and willfully caused Victim-1, to engage in commercial sex acts, knowing and in reckless disregard of the fact that Victim-1 was engaging in commercial sex acts as a result of force, fraud, and coercion.

(Title 18, United States Code, Sections 1591(a)(1), (b)(1), 1594(a), and 2.)

COUNT THREE
(Transportation to Engage in Prostitution)

The Grand Jury further charges:

17. From at least in or about 2009, up to and including in or about 2024, in the Southern District of New York and elsewhere, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, knowingly transported an individual in interstate and foreign commerce with intent that the individual engage in prostitution, and attempted, aided and abetted, and willfully caused the same, to wit, COMBS transported, aided and abetted, and willfully caused the transportation of female victims and commercial sex workers in interstate and foreign commerce on multiple occasions with the intent that they engage in prostitution.

(Title 18, United States Code, Sections 2421(a) and 2.)

FORFEITURE ALLEGATIONS

18. As a result of committing the offense alleged in Count One of this Indictment, SEAN COMBS, a/k/a “Puff Daddy,” a/k/a “P. Diddy,” a/k/a “Diddy,” a/k/a “PD,” a/k/a “Love,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant acquired or maintained in violation of Title 18, United

States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

19. As a result of committing the offense alleged in Count Two of this Indictment, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594, any and all property, real and personal, involved in, used, or intended to be used to commit or to facilitate the commission of said offense and any and all property traceable to such property; any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense and proceeds traceable to the commission of said offense.

20. As a result of committing the offense alleged in Count Three of this Indictment, SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love," the defendant, shall forfeit to the United States, pursuant to (i) Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, and (ii) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any

and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision


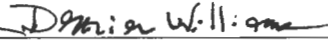
21. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 18, United States Code, Section 1594;
Title 18, United States Code, Section 1963;
Title 18, United States Code, Section 2428;
Title 21, United States Code, Section 853;
Title 28, United States Code, Section 2461.)

FOR PERSON



DAMIAN WILLIAMS
United States Attorney



P-Diddy Party List Names (Celebrities Politicians and Royalty)

1. Jay-Z As both a friend and fellow music mogul, Jay-Z has been a regular guest at many of Diddy's events, including the famous "White Party."
2. Beyoncé As Jay-Z's wife and a superstar in her own right, Beyoncé has attended several of Diddy's parties, particularly high-profile events like his New Year's Eve celebrations.
3. Jennifer Lopez Jennifer Lopez, who dated Diddy in the early 2000s, has frequently been seen at his parties even after their breakup. Their connection kept her on the guest list for years.
4. Kanye West Kanye West, another heavyweight in the music industry, has been spotted at multiple Diddy-hosted events, including music industry celebrations and fashion-related parties.
5. Kim Kardashian Kim Kardashian has attended Diddy's famous parties, including his annual birthday bashes and New Year's Eve extravaganzas.
6. Naomi Campbell The supermodel and longtime friend of Diddy is often present at his glamorous events, especially his exclusive yacht parties in St. Barts.
7. Mary J. Blige As a close friend and collaborator with Diddy, Mary J. Blige has been a regular fixture at his parties over the years.
8. Leonardo DiCaprio Leonardo DiCaprio, known for being a part of the Hollywood elite, has attended Diddy's parties, particularly during high-profile events like Coachella and Cannes.
9. Usher Usher, who has been close to Diddy since the start of his career, is a frequent attendee at his events, including his notorious birthday parties.

10. **Rihanna** The superstar singer has attended several Diddy-hosted parties, particularly in New York and Los Angeles, where both have deep social connections.
11. **Mariah Carey** Mariah Carey, another longtime friend and collaborator, has been spotted at many of Diddy's glamorous events, including New Year's Eve and fashion industry parties.
12. **Pharrell Williams** Pharrell has been a frequent attendee at Diddy's parties, and the two have collaborated musically, solidifying their bond both professionally and socially.
13. **Paris Hilton** Paris Hilton, a socialite known for being a fixture at high-profile events, has attended many of Diddy's famous gatherings, including his iconic "White Party."
14. **Justin Bieber** Justin Bieber has attended Diddy's parties, especially after becoming a global superstar. Diddy has acted as a mentor to Bieber in the past.
15. **50 Cent** Although they've had their share of public feuds, 50 Cent has attended some of Diddy's most famous parties over the years, particularly during their early friendship.
16. **Kendall and Kylie Jenner** The younger members of the Kardashian-Jenner clan have been spotted at Diddy's extravagant parties, reflecting their place in Hollywood's social elite.
17. **Lil' Kim** Lil' Kim, another artist who was closely associated with Bad Boy Records and Diddy, has been a regular guest at his parties.
18. **Drake** Drake has attended several of Diddy's events, including high-profile music industry gatherings and celebrations.
19. **Snoop Dogg** Snoop Dogg has been a regular presence at Diddy's parties, from Hollywood events to hip-hop industry celebrations.
20. **Alicia Keys** The singer-songwriter has been spotted at many of Diddy's elite gatherings, including his famous pre-Grammy parties.
21. **Serena Williams** The tennis superstar has attended Diddy's lavish events, from industry parties to celebrity yacht gatherings.
22. **David Beckham** As a close friend of Diddy, David Beckham has been a guest at numerous Diddy parties, particularly in Los Angeles and during major sporting events.
23. **Victoria Beckham** Victoria Beckham, a fashion icon and wife of David Beckham, is often seen attending Diddy's fashion-forward and exclusive events.
24. **Will Smith** Will Smith has been spotted at multiple parties hosted by Diddy, particularly during high-profile Hollywood gatherings and award season events.
25. **Jada Pinkett Smith** Along with her husband, Jada Pinkett Smith has attended Diddy's parties, especially events surrounding Hollywood or social justice causes.
26. **Chris Brown** The singer has been spotted at many of Diddy's parties, especially during the peak of his career in the early 2010s.
27. **Rick Ross** As a frequent collaborator and friend of Diddy, Rick Ross has attended many of his parties and is often seen at his Miami and Atlanta events.
28. **Nicki Minaj** Nicki Minaj has been seen at several of Diddy's major parties, especially in New York and Los Angeles.
29. **Tyler, The Creator** Tyler, The Creator, who has a unique place in the hip-hop industry, has attended some of Diddy's more exclusive events.
30. **Megan Thee Stallion** The rapper has attended some of Diddy's parties since she became a rising star in the music industry.
31. **Post Malone** Post Malone has been seen at several of Diddy's parties, including his iconic Grammy afterparties and other music industry events.
32. **Travis Scott** Travis Scott has been a guest at Diddy's high-profile events, particularly during fashion weeks and music festivals.
33. **Ellen DeGeneres** The talk show host has attended Diddy's lavish events, especially during Hollywood's award seasons and charity functions.
34. **Kevin Hart** Comedian and actor Kevin Hart has made appearances at Diddy's parties, including some of his infamous birthday bashes.

35. Jamie Foxx Jamie Foxx, known for both his acting and music career, has been a regular at Diddy's star-studded events.
36. Oprah Winfrey Oprah Winfrey, though known for staying private, has attended some of Diddy's most elite gatherings, especially charity events.
37. Quincy Jones Legendary producer Quincy Jones has been spotted at Diddy's parties over the years, showcasing his connection to various generations of music industry elites.
38. DJ Khaled DJ Khaled, a regular collaborator and close friend, is a staple at Diddy's parties, particularly in Miami.
39. Lenny Kravitz The musician and actor has been seen at many of Diddy's fashion-forward and music-centered events.
40. Madonna The pop icon has attended Diddy's exclusive events over the years, especially during the height of their influence in the '90s.
41. A\$AP Rocky A\$AP Rocky has been a frequent guest at Diddy's New York and fashion-related parties, aligning with both their mutual influence in the music and fashion worlds.
42. Cardi B Cardi B, who skyrocketed to fame in recent years, has attended some of Diddy's most exclusive events, including his luxurious New Year's Eve parties.
43. Kris Jenner The Kardashian-Jenner matriarch, Kris Jenner, has been a guest at Diddy's high-profile parties, particularly during fashion week events and Hollywood gatherings.
44. Lupita Nyong'o The Oscar-winning actress has been seen at Diddy's famous after-parties and industry events, especially surrounding the award season.
45. Sean Penn Actor Sean Penn has attended Diddy's exclusive events, often mingling with other stars from both Hollywood and the music industry.
46. Tyrese Gibson Actor and singer Tyrese Gibson has attended Diddy's parties, especially his infamous Grammy and BET Awards afterparties.
47. Zendaya Zendaya, the actress and style icon, has been seen at some of Diddy's high-end fashion events and music celebrations.
48. Big Sean Big Sean, the rapper signed to Kanye West's G.O.O.D. Music label, has attended several of Diddy's lavish gatherings, particularly in Los Angeles.
49. Michael B. Jordan The actor has been a guest at some of Diddy's more intimate Hollywood parties, including his birthday celebrations and pre-Oscar events.
50. Future Rapper Future has been spotted at Diddy's exclusive parties, including during big weekends like the BET Awards and Coachella.
51. Adele While more low-key, Adele has attended Diddy's parties, especially post-Grammy celebrations where music elites come together.
52. Steve Harvey Comedian and TV host Steve Harvey has been a regular at Diddy's events, including charity functions and luxurious Hollywood parties.
53. Chris Rock Chris Rock, known for his comedy and acting, has attended many of Diddy's gatherings, especially during award seasons.
54. Nas Rapper Nas has been a staple at Diddy's parties, given their shared history in the New York hip-hop scene.
55. Eva Longoria The actress has been seen at Diddy's glamorous events, including fashion shows, charity events, and major Hollywood parties.
56. Pharrell Williams Pharrell's presence at Diddy's parties is nearly guaranteed, particularly during fashion week and music industry celebrations, given their shared influence in both fields.
57. Lewis Hamilton The Formula 1 champion has attended Diddy's luxurious events, especially during Grand Prix weekends or in Monaco, where high-profile stars gather.
58. Joe Jonas Joe Jonas, both as a solo artist and part of the Jonas Brothers, has been seen at several of Diddy's major parties.
59. Sofia Vergara The actress has attended some of Diddy's parties, including high-profile Hollywood events like his Grammy afterparties.

60. Shakira The global superstar has been a guest at Diddy's parties, particularly around events like the MTV VMAs and other music award shows.
61. Demi Lovato Demi Lovato has attended Diddy's lavish parties, often in connection with Grammy or MTV VMA afterparties.
62. John Legend The singer and his wife, Chrissy Teigen, have been frequent attendees at Diddy's events, particularly his more intimate industry gatherings.
63. Chrissy Teigen Chrissy Teigen, known for her social media presence and marriage to John Legend, has attended Diddy's extravagant events, including fashion parties and awards show afterparties.
64. Teyana Taylor Singer and actress Teyana Taylor has been spotted at many of Diddy's high-profile industry events, especially those related to music and fashion.
65. Floyd Mayweather The undefeated boxing champ has been a regular at Diddy's parties, often attending his New Year's Eve bashes and music industry events.
66. Dr. Dre Music mogul Dr. Dre has attended several of Diddy's parties over the years, especially industry-related events celebrating hip-hop's biggest names.
67. LL Cool J Rapper and actor LL Cool J has been a fixture at Diddy's gatherings, reflecting their long history in the hip-hop world.
68. Swizz Beatz As a music producer and frequent collaborator, Swizz Beatz has attended many of Diddy's famous parties, from birthday bashes to award afterparties.
69. La La Anthony Actress and TV personality La La Anthony has been a regular guest at Diddy's parties, particularly his New Year's Eve and birthday celebrations.
70. Blake Lively Blake Lively has been seen at some of Diddy's upscale Hollywood and fashion-related parties, alongside her husband, Ryan Reynolds.
71. Ryan Reynolds The actor and businessman has attended Diddy's parties, particularly in relation to fashion and film industry events.
72. Mark Wahlberg Actor and businessman Mark Wahlberg has attended Diddy's events, especially those celebrating film and music industry success.
73. Cara Delevingne Model and actress Cara Delevingne has been spotted at Diddy's exclusive fashion-forward parties, particularly during Fashion Week.
74. Iggy Azalea The rapper has been a guest at some of Diddy's industry parties and high-profile music events, especially in Los Angeles.
75. Nick Jonas Nick Jonas, both solo and as a member of the Jonas Brothers, has attended Diddy's lavish gatherings, especially around music-related events.
76. Charlize Theron The actress has been seen at Diddy's parties, particularly those connected to the film industry and charity events.
77. Justin Timberlake The pop star and actor has been a guest at many of Diddy's famous parties, particularly during major award show weekends.
78. Gigi Hadid The model has attended several of Diddy's high-profile fashion and music industry parties, often alongside other major influencers.
79. Bella Hadid Like her sister Gigi, Bella Hadid has been a regular at Diddy's fashion and celebrity events, especially during Fashion Week.
80. Zoe Kravitz The actress and musician has attended several of Diddy's parties, including those with a focus on fashion and music.
81. Diplo The DJ and producer has been spotted at Diddy's parties, particularly his music-related events and wild Coachella parties.
82. Offset As one-third of Migos and a solo artist, Offset has attended many of Diddy's events, often in connection with music and hip-hop industry gatherings.
83. Saweetie Rapper Saweetie has been seen at Diddy's parties, especially those linked to the music industry and high-profile award celebrations.
84. Kendrick Lamar The Pulitzer Prize-winning rapper has been a guest at some of Diddy's biggest hip-hop-related events.

85. Lizzo Lizzo has been a guest at Diddy's parties, particularly his Grammy afterparties and other music industry gatherings.
86. Meek Mill Rapper Meek Mill has attended many of Diddy's parties, especially around major hip-hop events like the BET Awards.
87. Normani The singer and former Fifth Harmony member has attended several of Diddy's industry parties and fashion-related events.
88. Miguel R&B singer Miguel has been spotted at Diddy's industry events, especially during Grammy weekend.
89. Hailey Bieber Model Hailey Bieber has attended Diddy's parties alongside her husband Justin Bieber, particularly fashion and music industry events.
90. Jaden Smith Actor and musician Jaden Smith has been seen at Diddy's parties, particularly those focused on fashion and youth culture.

Royalty:

1. Prince Harry While Prince Harry has attended numerous exclusive events, including those with high-profile Hollywood guests, he has reportedly been seen at some parties connected to P. Diddy, particularly in the company of other music and entertainment stars.
2. Princess Beatrice of York Princess Beatrice, a member of the British royal family, has attended some events in the same circles as P. Diddy. She has been seen socializing with the music and fashion elite at exclusive London gatherings and other events in New York.
3. Princess Eugenie of York Like her sister, Princess Eugenie has mingled in elite social circles that overlap with Diddy's parties. Her involvement in the art world has brought her into contact with celebrities and industry figures who are frequently part of Diddy's guest lists.
4. Princess Charlotte Casiraghi of Monaco As a granddaughter of Grace Kelly and part of Monaco's royal family, Charlotte Casiraghi is often seen at glamorous events and fashion shows. While she is more involved in European fashion, she has been linked to high-profile parties attended by Hollywood stars, including those hosted by Diddy.
5. Prince Albert II of Monaco Prince Albert II, the reigning monarch of Monaco, is known for attending glamorous events and charity functions, particularly during the Monaco Grand Prix. While not directly spotted at Diddy's parties, Diddy has hosted events around the Monaco GP, where royalty such as Prince Albert have mingled with celebrities.
6. Sheikha Mozah bint Nasser (Qatari Royalty) As a prominent member of the Qatari royal family and an influential figure in philanthropy and education, Sheikha Mozah has appeared at international events where Diddy and other celebrities are present, particularly during fashion and art events.
7. Princess Madeleine of Sweden Princess Madeleine has been known to socialize in elite circles that sometimes intersect with Diddy's world, especially at high-society events like galas and charity functions in New York and Europe.
8. Crown Prince Pavlos of Greece and Marie-Chantal Crown Prince Pavlos of Greece and his wife Marie-Chantal have socialized with celebrities and international elites who frequent Diddy's parties. Marie-Chantal, as a prominent fashion figure, often attends the same events as Diddy, especially in New York and London.
9. Lady Victoria Hervey A British aristocrat and socialite, Lady Victoria Hervey has attended numerous exclusive celebrity events in both London and Los Angeles. She has been spotted at some of Diddy's famous gatherings over the years, as she frequently mingles in A-list celebrity circles.
10. Countess Luann de Lesseps Known for her appearances on *The Real Housewives of New York City*, Countess Luann de Lesseps, while not royalty in the traditional sense, holds a noble title through her former marriage to French aristocracy. She has attended high-society events in New York, some of which have overlapped with Diddy's circle.

11. Princess Firyal of Jordan Princess Firyal is known for her involvement in charity and humanitarian efforts, as well as her close connections to the world of high fashion and celebrity culture. She has attended events where Diddy and other high-profile figures are present.
12. Lady Kitty Spencer Lady Kitty Spencer, a niece of Princess Diana and a well-known socialite, has attended high-fashion and elite events, including some hosted by or attended by P. Diddy. Her presence in international fashion circles often puts her in the same social sphere.

Politicians:

1. Barack Obama (Former U.S. President) While President Obama himself may not have attended Diddy's parties directly, he and Diddy have publicly interacted on several occasions. Diddy was an early and vocal supporter of Obama during his 2008 presidential campaign. The two have crossed paths at political and cultural events.
2. Michelle Obama (Former First Lady) Michelle Obama and Diddy have met at various cultural and political events. Diddy was a strong advocate of the Obamas, especially during their presidential campaigns, and their paths crossed during events where entertainment and politics merged, although she's not been seen at his personal parties.
3. Al Sharpton (Civil Rights Activist and Politician) Reverend Al Sharpton has been a close collaborator with Diddy on many social justice causes, particularly those affecting African Americans. Sharpton has attended various events with Diddy, particularly those focused on politics, civil rights, and voter mobilization.
4. Jesse Jackson (Civil Rights Leader) Like Al Sharpton, Jesse Jackson has been present at several events alongside Diddy, especially those related to social justice and the promotion of African American rights and voter registration efforts.
5. Andrew Cuomo (Former Governor of New York) Former New York Governor Andrew Cuomo has crossed paths with Diddy at events focused on New York politics and charity work. Diddy has been involved in efforts to improve New York's communities, which put him in touch with political figures like Cuomo.
6. Cory Booker (U.S. Senator) Senator Cory Booker has interacted with Diddy at various social and political events. Diddy has supported initiatives that focus on youth empowerment and education, areas Booker is passionate about as well.
7. Bill Clinton (Former U.S. President) Former President Bill Clinton has been connected to several high-profile events attended by Diddy. While Clinton might not have been at Diddy's personal parties, their connection comes through their mutual appearances at charity galas, particularly events related to HIV/AIDS research and urban youth initiatives.
8. Hillary Clinton (Former U.S. Secretary of State) Hillary Clinton has had interactions with Diddy during her presidential campaign events, where he was a vocal advocate of voter participation. He supported her campaign in 2016 through public endorsements and media appearances.
9. Stacey Abrams (Political Leader) Stacey Abrams, a political activist and leader in voting rights, has interacted with Diddy during various events focused on civic engagement. Diddy has been vocal about voter registration, and Abrams' work aligns with his initiatives, particularly during election seasons.
10. Kamala Harris (U.S. Vice President) While there's no record of Vice President Harris attending Diddy's personal parties, they have crossed paths in various events tied to voter mobilization.



The Web Unraveled

As we reach the end of this gripping investigation, the intricate web surrounding Sean "P. Diddy" Combs becomes more apparent. The allegations and evidence presented throughout this book have painted a picture of a world where power, influence, and secrecy intertwine.

The AI analysis has uncovered a deep inner circle, a network of protection that extends beyond the glitz and glamour. This circle, woven with threads of loyalty and fear, has shielded P. Diddy from the prying eyes of the public and the relentless pursuit of justice.

Political involvements have also emerged as a significant factor, suggesting that the reach of this scandal may extend into corridors of power previously thought untouchable. The connections between entertainment and politics have never been more evident, as alliances and favors blur the lines between personal gain and public interest.

Throughout this investigation, we've explored the dynamics of celebrity culture, the allure of wealth, and the lengths to which individuals will go to protect their empires. But beyond the headlines and the sensationalism lies a deeper truth—a reflection on the human condition and the consequences of unchecked ambition.

As we close this chapter, we leave you with the tools to form your own conclusions. The evidence is laid bare, the players identified, and the motives questioned. In the end, the story of P. Diddy is not just about one man but about a system that thrives on secrecy and power.

Thank you for joining us on this journey. The truth is out there, waiting to be discovered.