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Electronically FILED by
Superior Court of California,
County of Los Angeles
7/07/2025 4:52 PM
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Executive Officer/Clerk of Court,
By L. Kulkin, Deputy Clerk

Attorneys for Plaintiff, JOHN DOE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JOHN DOE, an individual,
Plaintiff,
v.

Case No. **25SM CV 03462**

COMPLAINT FOR DAMAGES

SEAN COMBS, an individual; COMBS ENTERPRISES, LLC, a New York limited liability company; DADDY'S HOUSE RECORDINGS, INC., a New York corporation; CE OPCO, LLC, a Delaware limited liability company; COMBS GLOBAL, an unknown business entity; BAD BOY RECORDS, LLC, a Delaware limited liability corporation; CHRISTOPHER JORDAN WALLACE, an individual; WILLIE MACK, an individual, and DOES 1-100, inclusive,

Defendants.

1. **SEXUAL BATTERY**
2. **NEGLIGENCE**
3. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
4. **FALSE IMPRISONMENT**
5. **VIOLATION OF THE RALPH CIVIL RIGHTS ACT (Civ. Code § 51.7)**
6. **NEGLIGENT SUPERVISION AND RETENTION/FAILURE TO WARN**
7. **SEXUAL HARASSMENT UNDER CIVIL CODE § 51.9**

[DEMAND FOR JURY TRIAL]

COMES NOW, Plaintiff JOHN DOE, for causes of action against Defendants SEAN COMBS, COMBS ENTERPRISES, LLC, DADDY'S HOUSE RECORDINGS, INC., CE OPCO, LLC, COMBS GLOBAL, BAD BOY RECORDS, LLC, CHRISTOPHER JORDAN WALLACE, WILLIE MACK, and Does 1-100 (hereinafter collectively "Defendants"), and each of them, complains and alleges as follows:

PARTIES AND JURISDICTION

1. Plaintiff JOHN DOE is an adult victim of sexual assault. As such, he is entitled to protect his identity in this public filing by not disclosing his name. Plaintiff is currently a resident of the state of Florida.

2. Plaintiff is informed and believes, and based thereon alleges, Defendant SEAN COMBS (hereinafter as "COMBS") is an individual who at all relevant times herein was a resident of the County of Los Angeles in the State of California.

3. Plaintiff is informed and believes, and based thereon alleges, Defendant WILLIE MACK ("MACK") is an individual who at all relevant times herein was a resident of the County of Los Angeles in the state of California.

4. Plaintiff is informed and believes, and based thereon alleges, Defendant CHRISTOPHER JORDAN WALLACE ("WALLACE") is an individual who at all relevant times herein was a resident of the County of Los Angeles in the state of California.

5. Plaintiff is informed and believes, and based thereon alleges, Defendant COMBS ENTERPRISES, LLC ("COMBS ENTERPRISES"), at all relevant times herein, was a limited liability company incorporated in the state of New York, with its primary place of business in West Hollywood CA.

6. Defendant DADDY'S HOUSE RECORDINGS, INC. ("DADDY'S HOUSE"), at all relevant times herein, was a domestic business company incorporated in the state of New York and, on information and belief, has its principal place of business in West Hollywood, California.

7. Defendant CE OPCO, LLC, at all relevant times herein, was a limited liability company incorporated in the state of Delaware with its principal place of business in West Hollywood, California.

8. Defendant BAD BOY RECORDS, LLC, at all relevant times herein, was a Delaware limited liability company authorized to do business in the State of California.

9. Plaintiff is informed and believes, and thereon alleges, that Defendant COMBS GLOBAL is an unknown business entity that at all relevant times herein was authorized to do business in the state of California, County of Los Angeles.

1 10. Plaintiff is informed and believes, and thereon alleges, that Defendants BAD BOY
2 RECORDS, LLC, DADDY’S HOUSE, COMBS GLOBAL, COMBS ENTERPRISES, CE OPCO,
3 LLC, and DOES 1 to 50, inclusive, (hereinafter collectively the “COMBS CORPORATIONS”).

4 11. Plaintiff is informed and believes, and thereon alleges, that at all relevant times
5 mentioned herein the COMBS CORPORATIONS are doing businesses in and under the laws of the
6 State of California in the County of Los Angeles.

7 12. The true names, identities, or capacities, whether individual, associate, corporate, or
8 otherwise, of Defendants DOES 1 through 100 are unknown to Plaintiff, who therefore sues said
9 Defendants by such fictitious names. When the true names, identities, or capacities of such
10 fictitiously designated Defendants are ascertained, Plaintiff will ask leave of Court to amend the
11 complaint to assert the true names, identities, and capacities, together with the proper charging
12 allegations.

13 13. Plaintiff is informed and believes, and thereon alleges, that each of the Defendants
14 designated herein as a DOE is legally responsible in some manner, for the events and happenings
15 herein alleged, and that such Defendants proximately caused Plaintiff’s damages alleged herein.

16 14. Plaintiff is informed and believes, and thereon alleges, that at all times material hereto and
17 mentioned herein, each defendant sued herein (both named and DOE Defendants) was the agent,
18 servant, employer, joint venturer, contractor, partner, division owner, subsidiary, division, alias,
19 and/or alter ego of each of the remaining defendants and was, at all times, acting within the purpose
20 and scope of such agency, servitude, employment, contract ownership, subsidiary alias and/or alter
21 ego and with the authority consent, approval, control, influence and ratification of each remaining
22 defendants. PLAINTIFF is further informed and believes, and thereupon alleges, that at all time
23 relevant herein, each and every Defendant, was negligent in the selection and hiring of each and
24 every other Defendant as an agent, employee, and/or joint venturer.

25 15. Each of the Defendants aided and abetted each other Defendant. Each Defendant
26 knowingly gave substantial assistance to each other Defendant who performed the wrongful
27 conduct alleged herein. Accordingly, each Defendant is jointly and severally liable for the damages
28 proximately caused by each other Defendant’s wrongful conduct.

1 16. Whenever reference is made to “Defendants” in this Complaint, such allegation
2 shall be deemed to mean the acts of Defendants acting individually, jointly, and/or severally.

3 **GENERAL ALLEGATIONS**

4 **BACKGROUND FACTS COMMON TO ALL ALLEGATIONS**

5 18. Defendant, SEAN COMBS is a hip-hop music mogul, Grammy-awarded musician,
6 rapper, producer, and record executive who rose to prominence in the music and entertainment
7 industry over the decades. Defendant COMBS is known by his stage names *Puff Daddy*, *Puffy*,
8 *Puff*, *P. Diddy*, *Diddy*, *Brother Love* or *Love*. Defendant COMBS has signed some of the biggest
9 stars in music including, Rick Ross, Machine Gun Kelly, Notorious B.I.G, New Edition, Mase,
10 Pitbull, Lil John, Fabolous, French Montana and groups like Danity Kane. In 1992, Defendant
11 COMBS founded Bad Boy Records, and the company has since sold over 500 million records,
12 produced 38 platinum albums, and won multiple Grammy Awards.

13 19. In or around 1998, Plaintiff first met Defendant COMBS while working on a
14 project with the group Days of the New on their album soundtrack, Godzilla. Godzilla featured a
15 song with Defendant COMBS as headliner on the main single. It was during this recording project
16 for Godzilla that PLAINTIFF first met Defendant COMBS.

17 20. Then a few years later in 2001, while working with Southwest Wholesale in
18 Houston, PLAINTIFF went to the Spy Club with executives and employees of COMBS
19 CORPORATIONS, including Defendant COMBS. While at Spy Club, PLAINTIFF was invited
20 into a private area of the club by executives and employees of COMBS CORPORATIONS and
21 COMBS. While there, PLAINTIFF began drinking alcohol while Defendant COMBS and many
22 others in his entourage were drinking and doing drugs. However, unbeknownst to the PLAINTIFF,
23 PLAINTIFF’s drink had been drugged, which caused him to become unconscious. When he woke
24 up, he found himself in a parking lot of a local hospital. It was at that time that PLAINTIFF was
25 subsequently treated for drug overdose treatment at the hospital later determined to be in Humble,
26 Texas.

27 21. In 2002, a year later, it was reported by the media that Spy Club was tied to one of
28 the largest ecstasy-trafficking rings in the world by the federal government.

1 22. Then in 2005, PLAINTIFF attended a meeting at Daddy's House Studio in
2 Manhattan, New York, where he was auditioning for a spot on the posthumous Notorious B.I.G.
3 album. Daddy's House was a legendary studio, that, at the time, was the epicenter of the music
4 scene, where some of the most iconic tracks in in hip-hop history were being recorded. Being at
5 Daddy's House wasn't just a studio – it was being at the very heart of the industry's creative pulse.
6 PLAINTIFF pitched several tracks for the project—both his own and those featuring other artists.
7 However, Defendant COMBS rejected some of the featured artists from PLAINTIFF's
8 submissions, ultimately deciding not to include PLAINTIFF in the final project.

9 23. Later in 2005, PLAINTIFF returned to Daddy's House in Manhattan, New York
10 with a longtime friend of Defendant COMBS from their Mount Vernon High School days.
11 PLAINTIFF was there working on a project for another COMBS CORPORATIONS artist, while
12 also contributing separately as a songwriter for Defendant COMBS. One night, while stepping
13 outside for a cigarette, PLAINTIFF found himself in what felt like a live block party scene—an
14 alley buzzing with life. Artists and insiders were gathered around, speakers blasting unreleased
15 tracks, heads nodding in rhythm, everyone waiting for their shot to get into Daddy's House.

16 24. When PLAINTIFF returned to the studio, Defendant COMBS was standing in the
17 hallway, listening to music that was playing. Defendant COMBS turned to PLAINTIFF and asked
18 if he had any tracks for one of his artists. The two then walked into another room located between
19 the main studio and the smaller studio where some of the artists were working.

20 25. Once inside, PLAINTIFF struggled to get his CD to play. He was extremely
21 nervous as this was a one-on-one session with one of the most iconic music producers of the time.
22 As PLAINTIFF flipped through his tracks, Defendant COMBS blasted the music at such a high
23 volume that it hurt PLAINTIFF's ears. Defendant COMBS began dancing to the music. When one
24 particular track played, Defendant COMBS danced even more enthusiastically. PLAINTIFF felt
25 deeply honored: he was in a studio, playing his music, and Defendant COMBS—an industry
26 legend—was dancing to songs he had helped create. But then the energy shifted.

27 26. Suddenly, Defendant COMBS turned to PLAINTIFF and asked if he was looking at
28 Defendant COMBS' genitals. Caught off guard, PLAINTIFF denied it and laughed, trying to

1 dismiss the bizarre comment. Defendant COMBS kept dancing and repeated the accusation,
2 claiming PLAINTIFF wanted to see his genitals. Then, Defendant COMBS stepped closer, pulled
3 down his pants, and exposed his penis, telling PLAINTIFF to look at it since he was “trying to
4 look.” Defendant COMBS moved even closer, telling PLAINTIFF to touch his penis. PLAINTIFF
5 again tried to play it off with nervous laughter, spinning his chair away from Defendant COMBS in
6 an attempt to create distance. But Defendant COMBS continued, pushing himself toward
7 PLAINTIFF’s face and telling him to “suck it.” Suddenly, a loud buzz came through the studio
8 room, interrupting the moment. COMBS abruptly stopped, turned to PLAINTIFF, and said he was
9 “bullshit” and his music was “wack,” then left the room—leaving PLAINTIFF alone and in shock.

10 27. After that encounter, PLAINTIFF believed he would never see COMBS again, but
11 unfortunately, he did.

12 28. The next encounter Plaintiff had with COMBS came when Plaintiff was asked to
13 assist one of the COMBS CORPORATIONS’ executives with whom he had previously worked to
14 help during the production of COMBS’ *American Gangster* album by Jay Z. COMBS’ produced
15 and recorded that album at Daddy’s House studio, working with several producers PLAINTIFF had
16 previously collaborated with on other projects. During one of the listening sessions for *American*
17 *Gangster*, COMBS approached PLAINTIFF, bent down next to him, and asked to speak with him
18 in private. PLAINTIFF and COMBS then went into the adjacent studio room, where COMBS
19 proceeded to lock the door behind them.

20 29. COMBS then asked PLAINTIFF if he was going to “bitch out” at which time
21 COMBS took out a handgun from behind his back and placed it menacingly in the middle of the
22 audio cabinet rack in front of the mixing board.

23 30. Defendant COMBS then began rolling two blunts – sprinkling one of them with
24 cocaine for himself – and handed the other one to PLAINTIFF to smoke. COMBS then started
25 pouring shots saying he wanted to celebrate being nearly finished with the albums. Meanwhile,
26 people outside the studio room could be heard knocking and trying to open the locked door.

27 31. In light of the attempted intrusion into his room, COMBS repeatedly told
28 PLAINTIFF to stay quiet as the two remained alone in the room. While there, PLAINTIFF quickly

1 began to feel as though he may have been drugged, got on the floor, and began to become dizzy and
2 disoriented. One of the few things PLAINTIFF remembers during this episode was, COMBS
3 getting on top of him and began touching PLAINTIFF's genitals, performing oral copulation on
4 PLAINTIFF. The next thing PLAINTIFF remembers is waking up alone on the couch. Everyone
5 who had previously been in the studio was gone and Plaintiff was unable to recognize any of the
6 individuals remaining.

7 **THE ATTACKS ON PLAINTIFF**

8 32. At or around September 2020, PLAINTIFF was producing a Biggie Smalls project
9 for the estate of the largest artists that worked with COMBS' CORPORATIONS', the Notorious
10 B.I.G.

11 33. At that same time, PLAINTIFF was at a studio with some of the artists and
12 members of COMBS CORPORATIONS in Los Angeles, California, for a listening session for the
13 Notorious B.I.G. project. During that listening session, COMBS arrived to give feedback on the
14 songs that PLAINTIFF produced and mixed. COMBS stated the songs for the project were not
15 good enough and pressured PLAINTIFF to do ketamine in the studio to make the music sound
16 better as that is how music would be heard at raves.

17 34. Sometime later, COMBS, PLAINTIFF and other members of COMBS
18 CORPORATIONS went to a warehouse in Los Angeles that held some of Notorious B.I.G.'s
19 clothes that he wore while he was alive at the warehouse that were being donated to the Rock &
20 Roll Hall of Fame later that year when Biggie would eventually be inducted. Clothes were on the
21 racks everywhere in the warehouse. COMBS again provided drugs to everyone present. Everyone
22 there was running around the warehouse and tripping on the drugs.

23 35. At some point in time, COMBS and PLAINTIFF somehow ended up in a room
24 alone together at the warehouse. COMBS told PLAINTIFF to put on some of the clothes that were
25 hanging up in the room. PLAINTIFF thought it was a huge honor to be wearing the Notorious
26 B.I.G.'s clothing. PLAINTIFF obliged and changed into one of the jerseys as told. COMBS then
27 started watching porn on his cell phone in front of PLAINTIFF. COMBS then grabbed one of
28 Biggie's shirts off a rack and began to masturbate with it in front of PLAINTIFF. PLAINTIFF

1 pretended he did not see what COMBS was doing and began smoking a cigarette while looking at
2 his own phone. Without any provocation, COMBS then suddenly told PLAINTIFF to “finish”
3 COMBS off. Before PLAINTIFF could react, COMBS then orgasmed into the Notorious B.I.G.’s
4 shirt, laughed, and threw the shirt over PLAINTIFF’s lap and arm, covering PLAINTIFF in
5 COMBS semen. COMBS then got up, laughed, said “R.I.P. Biggie”, and left the room leaving
6 PLAINTIFF alone with the remnant of COMBS’ depravity.

7 36. PLAINTIFF was embarrassed and humiliated and went home to clean himself off.

8 37. The next time PLAINTIFF saw COMBS, was at a meeting with other employees of
9 COMBS CORPORATIONS at a studio, including Biggie’s son, WALLACE, MACK and DOES 51
10 - 100, when COMBS unexpectedly arrived and told PLAINTIFF he was going to “fuck the shit out
11 of [him] eventually”. COMBS then proceeded to grope PLAINTIFF’s genitalia.

12 38. COMBS then proceeded to tell the other people at the location that PLAINTIFF
13 was “gay”. This declaration directly caused some of the people in the room, including MACK, to
14 begin sexually harassing PLAINTIFF.

15 39. PLAINTIFF then snapped and threatened to go public if the behavior of exhibited
16 by COMBS and the COMBS CORPORATIONS’ employees and agents did not stop.

17 40. Despite the warning, a few days later PLAINTIFF received a call from members of
18 COMBS CORPORATIONS, including DEFENDANTS WALLACE and MACK and DOES 51-
19 100, stating they wanted to find a resolution for the previous incidences, including those involving
20 COMBS. WALLACE and MACK and DOES 51-100 then picked PLAINTIFF up in a COMBS
21 CORPORATIONS’ vehicle and drove PLAINTIFF over to a Revolt TV location. On the way to the
22 location, DEFENDANTS WALLACE and MACK apologized to PLAINTIFF and made promises
23 of more business opportunities for PLAINTIFF with COMBS and the COMBS CORPORATIONS.
24 Upon entering Revolt, DOES 51-100 grabbed PLAINTIFF and covered his head blocking his vision
25 and aggressively moving PLAINTIFF to an unknown location. PLAINTIFF then heard COMBS
26 yelling in PLAINTIFF’s face. COMBS instructed everyone to leave. COMBS then began yelling
27 profanities at PLAINTIFF. COMBS then attempting to force PLAINTIFF to perform oral
28 copulation on COMBS while PLAINTIFF’s head was still covered all the while yelling at

1 PLAINTIFF and saying PLAINTIFF's involvement with the project was over.

2 41. PLAINTIFF is informed and believes and there upon alleges that at some time
3 during this episode COMBS and/or someone associated with the COMBS CORPORATIONS could
4 be heard snapping a photo of PLAINTIFF.

5 42. At some point, COMBS eventually left the room. At which point, PLAINTIFF was
6 able to escape the room he was in.

7 43. Immediately thereafter, PLAINTIFF was somehow able to find his way back to the
8 location where the vehicle he had arrived in was parked where WALLACE, MACK and DOES 51-
9 100 were waiting for him.

10 44. Defendants WALLACE, MACK and DOES 51-100 then drove PLAINTIFF home
11 with the taste of COMBS' genitalia still fresh in PLAINTIFF's mouth.

12 45. PLAINTIFF was broken and fell into a dark place mentally after the incident
13 experiencing extreme depression as a result.

14 46. A few months later, DEFENDANTS and DOES 1 - 100, inclusive, and each of
15 them, terminated PLAINTIFF from the project and blacklisted him from parts of the music
16 industry.

17 47. PLAINTIFF is informed and believes, and thereupon alleges, that Defendants,
18 including but not limited to, COMBS, COMBS CORPORATIONS, WALLACE, MACK, and
19 DOES 1 -100's, inclusive, and each of them, conspired to sexually assault PLAINTIFF and
20 maintain PLAINTIFF's silence. In furtherance of this conspiracy, these Defendants and DOES 1-
21 100, inclusive, and each of them, coerced PLAINTIFF into getting into a vehicle with them under
22 the pretext of apologizing to PLAINTIFF and promising Plaintiff further exclusive work only to
23 then allow others to cover PLAINTIFF's head and lead him to an unknown location where he was
24 sexually assaulted and battered. These Defendants and DOES 1-100 then took PLAINTIFF home
25 after he was sexually assaulted by. These acts were committed with full knowledge of COMBS',
26 and DOES 51 through 100, propensity for harm and in callous disregard of the safety and well-
27 being of PLAINTIFF and others.

28 48. PLAINTIFF is informed and believes, and thereupon alleges, that prior to the

1 incidents described herein, the COMBS CORPORATIONS and DOES 1 through 50, inclusive, by
2 and through their officers, directors, agents, managers, and/or employees, including, Tarik Brooks
3 of BAD BOY RECORDS, LLC, Stephen Dent of DADDY'S HOUSE, Barry R. Cohen of COMBS
4 ENTERPRISE, Tarik Brooks of CE OPCO, LLC, and Roma Khanna of COMBS GLOBAL, Revolt
5 Media, were aware that COMBS had a history and reputation for violent, sexually predatory, and
6 abusive behavior towards individuals.

7 49. Plaintiff is informed and believes, and thereupon alleges, that the COMBS
8 CORPORATIONS and DOES 1 through 50's officers, directors, agents, managers, and/or
9 employees, including, Tarik Brooks of BAD BOY RECORDS, LLC, Stephen Dent of DADDY'S
10 HOUSE, Barry R. Cohen of COMBS ENTERPRISE, Tarik Brooks of CE OPCO, LLC, and Roma
11 Khanna of COMBS GLOBAL, Revolt Media, had been informed by employees, contractors, and
12 others and, at all relevant times, knew that COMBS was known to have sexually harassed, abused,
13 and assaulted other individuals.

14 50. Plaintiff is further informed and believes, and thereupon alleges, that the COMBS
15 CORPORATIONS and DOES 1 through 50's officers, directors, agents, managers, and/or
16 employees, including, Tarik Brooks of BAD BOY RECORDS, LLC, Stephen Dent of DADDY'S
17 HOUSE, Barry R. Cohen of COMBS ENTERPRISE, Tarik Brooks of CE OPCO, LLC, and Roma
18 Khanna of COMBS GLOBAL, Revolt Media, failed to conduct any investigation into these
19 allegations, despite being informed of them prior to and after multiple incidents involving the
20 violent sexual harassment and assault of Plaintiff and others. These the COMBS CORPORATIONS
21 and DOES 1 through 50's officers, directors, agents, managers, and/or employees, including, Tarik
22 Brooks of BAD BOY RECORDS, LLC, Stephen Dent of DADDY'S HOUSE, Barry R. Cohen of
23 COMBS ENTERPRISE, Tarik Brooks of CE OPCO, LLC, and Roma Khanna of COMBS
24 GLOBAL, Revolt Media, failed to keep COMBS from having physical contact with individuals,
25 failed to report the behavior to law enforcement, and failed to implement any protective or
26 disciplinary measures against COMBS.

27 51. The COMBS CORPORATIONS and DOES 1 through 50, inclusive, and each of
28 them, continued to allow COMBS unfettered access to secluded rooms or properties with persons,

1 including Plaintiff, where there was no oversight, chaperoning, or supervision. Despite their duty to
2 protect those working with or for their enterprise, the COMBS CORPORATIONS and DOES 1
3 through 50's officers, directors, agents, managers, and/or employees, including, Tarik Brooks of
4 BAD BOY RECORDS, LLC, Stephen Dent of DADDY'S HOUSE, Barry R. Cohen of COMBS
5 ENTERPRISE, Tarik Brooks of CE OPCO, LLC, and Roma Khanna of COMBS GLOBAL, Revolt
6 Media, ignored repeated complaints and reports about COMBS' well documented conduct. They
7 failed to investigate or take corrective action and, in doing so, ratified COMBS' predatory behavior,
8 enabling a pattern of abuse and misconduct.

9 52. Each of the COMBS CORPORATIONS and DOES 1 through 50's officers,
10 directors, agents, managers, and/or employees, including, Tarik Brooks of BAD BOY RECORDS,
11 LLC, Stephen Dent of DADDY'S HOUSE, Barry R. Cohen of COMBS ENTERPRISE, Tarik
12 Brooks of CE OPCO, LLC, and Roma Khanna of COMBS GLOBAL, Revolt Media, engaged in
13 the above-described conduct with a conscious disregard of the dangers their actions created for
14 Plaintiff's rights, safety, and emotional and physical well-being. Each of the COMBS
15 CORPORATIONS and DOES 1 through 50's officers, directors, agents, managers, and/or
16 employees, including, Tarik Brooks of BAD BOY RECORDS, LLC, Stephen Dent of DADDY'S
17 HOUSE, Barry R. Cohen of COMBS ENTERPRISE, Tarik Brooks of CE OPCO, LLC, and Roma
18 Khanna of COMBS GLOBAL, Revolt Media, conduct was malicious, oppressive, and done with
19 the intent to prevent accountability for COMBS and protect their business interests at the expense
20 of Plaintiff's health and dignity.

21 53. As a result of the inaction or actions taken by the COMBS CORPORATIONS and
22 DOES 1 through 50's officers, directors, agents, managers, and/or employees, including, Tarik
23 Brooks of BAD BOY RECORDS, LLC, Stephen Dent of DADDY'S HOUSE, Barry R. Cohen of
24 COMBS ENTERPRISE, Tarik Brooks of CE OPCO, LLC, and Roma Khanna of COMBS
25 GLOBAL, Revolt Media, Plaintiff has suffered extreme psychological harm, economic loss,
26 professional ruin, and irreparable emotional trauma warranting an award of compensatory and
27 punitive damages as provided by law.

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1 **FIRST CAUSE OF ACTION**

2 **SEXUAL BATTERY**

3 **(Against ALL DEFENDANT, and DOES 1 through 100, inclusive)**

4 54. Plaintiff re-alleges and incorporates herein by reference each and every allegation and
5 statement contained in the prior paragraphs as though set forth here in full.

6 55. COMBS, intentionally, recklessly, and wantonly made sexual advances, solicitations,
7 requests, threats, and demands for sexual acts of a hostile nature that were unwelcome, pervasive,
8 and severe. The sexual harassment, assault, and abuse included but not limited to COMBS,
9 manipulating, groping PLAINTIFF, including PLAINTIFF's genitals, as well as forcing PLAINTIFF
10 to perform oral copulation on COMBS.

11 56. Defendants and DOES 1 through 100 conspired and acted in furtherance of the conspiracy,
12 as previously alleged herein, with COMBS to allow or assist in COMBS ability to carry out the
13 aforementioned acts with the intent to cause a harmful offensive contact with both an intimate part of
14 PLAINTIFF's person and would offend a reasonable sense of personal dignity. Further, said acts did
15 cause harmful or offensive contact with an intimate part of PLAINTIFF's person that would offend
16 a reasonable sense of personal dignity. Defendants, and DOES 1 – 100, inclusive, and each of them,
17 knew or had reason to know that COMBS was committing these acts against PLAINTIFF prior to, at
18 the time off and following the acts alleged herein above.

19 57. Because of COMBS' position of authority over PLAINTIFF, PLAINTIFF did not give
20 consent to such acts.

21 58. Defendants, and DOES 1 – 100, inclusive, and each of them, ratified and authorized
22 COMBS' sexual assault of PLAINTIFF by failing to properly act on their advance, contemporaneous
23 or subsequent knowledge of the sexual assaults and abuse PLAINTIFF suffered and protect
24 PLAINTIFF from these sexual assaults at the hands of COMBS. Defendants, and DOES 1 – 100,
25 inclusive, and each of them, failing to inform or concealing from law enforcement officials the
26 COMBS sexually assaulted PLAINTIFF, and actively shielding COMBS from responsibility for his
27 sexual assaults, abuse, and harassment of PLAINTIFF.

28 59. As a result of the above-described conduct, PLAINTIFF has suffered economic injury all to

1 PLAINTIFF'S general, special damages in an amount to be proven at trial, but in an amount greater
2 than the jurisdictional minimum amount of this Court.

3 60. As a result of the above-described conduct, PLAINTIFF has suffered and continues to suffer
4 great mental anguish, shock, emotion distress, anxiety, depression, suicidal thoughts, feeling of self-
5 blame, hypervigilance, a loss of sense of trust, and relationship and intimacy issues and was prevented
6 from performing daily activities, work and obtaining the full enjoyment of life.

7 61. Defendants and DOES 1 through 100 acted willfully and maliciously with the intent to harm
8 PLAINTIFF and in conscious disregard for PLAINTIFF'S rights so as to constitute malice and
9 oppression under Civil Code section 3294. PLAINTIFF is entitled to the recovery of punitive
10 damages in a sum to be shown according to proof at trial.

11 **SECOND CAUSE OF ACTION**

12 **NEGLIGENCE**

13 **(Against All DEFENDANTS, and DOES 1 through 100, inclusive)**

14 62. Plaintiff re-alleges and incorporates herein by reference each and every allegation
15 and statement contained in the prior paragraphs as though set forth here in full.

16 63. Defendants, and DOES 1 – 100, inclusive, and each of them, are persons or entities
17 who owed a duty of care to PLAINTIFF or had a duty to control the conduct of the perpetrator,
18 COMBS by way of the special relationship existing between those individuals.

19 64. Defendants and DOES 1 through 1000, inclusive, and each of them, knew or should
20 have known of the misconduct and sexually predatory behavior of COMBS directed at anyone who
21 he came into close proximity with in a secluded setting away from the eyes of the general public.

22 65. Despite having knowledge of COMBS sexually deviant propensities and prior
23 sexually predatory misconduct, Defendants and DOES 1 through 100, inclusive, and each of them,
24 failed to take any preventive action to control, curb, and/or prevent that conduct, and failed to warn
25 PLAINTIFF of that wrongful conduct, despite having a legal duty to do so.

26 66. Due to the nature of the relationship between Defendants, and DOES 1 – 100,
27 inclusive, and each of them, and PLAINTIFF reasonably relied on Defendants and DOES 1 through
28 100 to take care of him and act in his best interest.

1 67. Defendants, and DOES 1 – 100, inclusive, and each of them, as PLAINTIFF's
2 business partners, in whom was placed PLAINTIFF'S confidence and trust, owed a duty to
3 PLAINTIFF to exercise reasonable care, supervision, and protection while working with
4 PLAINTIFF and acting in PLAINTIFF's best interests.

5 68. Defendants, and DOES 1 – 100, inclusive, and each of them, breached their duties
6 of care to PLAINTIFF by failing to exercise reasonable care, supervision, and protection while
7 Plaintiff was working for the DEFENDANTS.

8 69. Defendants and DOES 1 – 100, inclusive, and each of them, conduct, actions, and
9 omissions served to create an environment in which COMBS was afforded continuous secluded
10 access to PLAINTIFF who was sexually assaulted, battered and abused by COMBS. COMBS'
11 assaults continued at each opportunity and existed throughout all of PLAINTIFF'S interactions with
12 Defendants' artists and record company.

13 70. Defendants, and DOES 1 – 100, inclusive, and each of them, knew or should have
14 known of COMBS' sexually abusive and exploitative propensities, and/or that he was unfit to
15 exercise reasonable care and protection of PLAINTIFF. It was foreseeable that if Defendants and
16 DOES 1 through 100, inclusive, and each of them did not adequately exercise or provide the duty of
17 care owed to PLAINTIFF that PLAINTIFF would be vulnerable to COMBS' manipulation, sexual
18 assault, harassment, and battery.

19 71. Defendants and DOES 1 – 100, inclusive, and each of them, through their actions
20 and inactions, breached their duties of care to PLAINTIFF by failing to provide adequate
21 supervision and ensuring that such supervision was sufficient to ensure the safety of PLAINTIFF.
22 Defendants and DOES 1 – 100, inclusive, and each of them, coerced PLAINTIFF to come to a
23 location under false pretenses of an apology and future work, allowed Defendant COMBS to be in
24 rooms alone with the PLAINTIFF for sexual acts; ignored or otherwise failing to properly act on
25 their knowledge of the sexual assaults and batteries PLAINTIFF suffered, failing to inform or
26 concealed from law enforcement officials that COMBS sexually assaulted and battered PLAINTIFF,
27 retaliating against PLAINTIFF by removing PLAINTIFF from the project; blacklisting PLAINTIFF
28 from parts of the music industry; conspiring to sexually assault PLAINTIFF; and otherwise failing to

1 protect PLAINTIFF from sexual battery at the hands of COMBS.

2 72. Defendants and DOES 1 – 100's actions, in permitting and, in fact, compelling
3 PLAINTIFF to remain in an environment where he was subjected to continual, cruel sexual battery
4 and harassment, amounted to a wanton or reckless disregard for PLAINTIFF'S emotional and
5 physical well-being. Defendants and DOES 1 – 100's actions were so outrageous as to put any
6 reasonable person on guard that PLAINTIFF's safety was in real and imminent peril. At all relevant
7 times, Defendants and DOES 1 – 100, and each of them, should and could have removed COMBS
8 from continuing his sexual advances, harassments, assaults, and batteries against PLAINTIFF.
9 Instead of doing so, Defendants and DOES 1 – 100 purposefully caused PLAINTIFF to continue to
10 suffer. Defendants and DOES 1 – 100 refused to take action to protect PLAINTIFF from the assaults
11 he was experiencing and actively obstructed his attempts to stop the sexual assaults.

12 73. Defendants, and DOES 1 – 100, inclusive, and each of them, instead helped to
13 coerce PLAINTIFF into coming to an unassuming location so that COMBS could continue his
14 sexual harassment, battery, and assault of PLAINTIFF.

15 74. Defendants breached their duty of care that they owed to PLAINTIFF by
16 pervasively and repeatedly allowing COMBS to engage in the wrongful acts alleged herein against
17 PLAINTIFF.

18 75. Defendants and DOES 1 through 100 owed PLAINTIFF a duty of care to either not
19 harm PLAINTIFF and/or to protect PLAINTIFF and keep him free and safe from bodily harm.
20 Instead, in a direct breach of this duty, COMBS violated PLAINTIFF's body by subject him to cruel,
21 horrific, and criminal sexual acts.

22 76. As a direct and legal result of the negligence of Defendants and DOES 1 through
23 100, inclusive, and each of them, Plaintiff was sexually assaulted by COMBS.

24 77. Had Defendants and DOES 1 through 100, inclusive, and each of them, fulfilled
25 their duties and responsibilities, PLAINTIFF would not have been subject to all or most of the
26 misconduct perpetrated against him by COMBS.

27 78. As a direct and legal result of Defendants and DOES 1 through 100, inclusive, and
28 each of them, having breached their duty to properly supervise and/or warn PLAINTIFF of the

1 potential of the wrongful conduct ultimately perpetrated by COMBS against PLAINTIFF,
2 PLAINTIFF has been severely damaged emotionally and physically, and otherwise, in amounts to be
3 determined, but which exceed the jurisdictional limits of this Court.

4
5 **THIRD CAUSE OF ACTION**
6 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
7 **(Against All DEFENDANTS and DOES 1 through 100)**

8 79. PLAINTIFF realleges and incorporates by reference herein each and every
9 allegation and statement contained in the prior paragraphs as though set forth here in full.

10 80. COMBS acted in an extreme and outrageous manner.

11 81. COMBS' conduct, including but not limited to his sexual assault, and battery of
12 PLAINTIFF, asking for sexual favors, and forcing PLAINTIFF to perform oral copulation on
13 COMBS was outrageous, intended to terrorize and cause him emotional distress, and did in fact
14 caused him emotional distress. This assault was so extreme as to go beyond the bound of decency
15 and be regarded intolerable by civilized society.

16 82. Defendants, and DOES 1 – 100, inclusive, and each of them, acted intentionally and
17 with reckless disregard for the rights of PLAINTIFF.

18 83. The Defendants and DOES 1 – 100, inclusive, and each of them, further failed to
19 inform law enforcement of COMBS' actions.

20 84. Defendants and DOES 1 – 100, inclusive, and each of them, further failed to keep
21 COMBS away from PLAINTIFF. Moreover, instead of trying to help PLAINTIFF, the Defendants
22 and DOES 1 – 100, instead subjected PLAINTIFF to harm when they conspired and assisted
23 COMBS into helping to trick and deceive PLAINTIFF by getting him to come to a location and then
24 bound his arms and cover his head obstructing his vision and lead him to an unknown room so that
25 COMBS could further sexually harass and abuse PLAINTIFF.

26 85. As a direct and legal result of Defendants and DOES 1 – 100, inclusive, and each of
27 them, PLAINTIFF was subjected to severe mental anguish and mental distress as result of the
28 actions and omissions of the said Defendants and DOES 1 through 100, and each of them.

1 sexually abused PLAINTIFF against his will.

2 93. As a direct and legal result of the wrongful conduct and/or omissions of Defendants
3 and DOES 1-100, and each of them, PLAINTIFF suffered, and continues to suffer injuries and
4 damages, including mental and emotional distress.

5 94. Defendants and DOES 1-100's despicable conduct was intended to cause injury to
6 PLAINTIFF and was carried out with a willful and conscious disregard for his health and safety.

7 95. Defendants and DOES 1-100's conduct or omissions subjected PLAINTIFF to cruel
8 and unjust malicious conduct, PLAINTIFF is entitled to punitive damages.

9 **FIFTH CAUSE OF ACTION**

10 **VIOLATION OF THE RALPH CIVIL RIGHTS ACT, Cal. Civ. Code § 51.7**

11 **(AGAINST DEFENDANT COMBS)**

12 96. Plaintiff realleges and incorporates by reference herein each and every allegation and
13 statement contained in the prior paragraphs as though set forth here in full.

14 97. Defendants and DOES 1-100, and each of them, knowingly conspired and assisted
15 COMBS in committing violent acts against PLAINTIFF, motivated by his sex, by groping his
16 genitalia, making lewd comments to and about him, and forcing PLAINTIFF to perform oral
17 copulation on COMBS without PLAINTIFF'S consent, and under duress. As a result of his violent
18 acts against PLAINTIFF, PLAINTIFF suffers and continues to suffer physical and mental harm.

19 98. DEFENDANT COMBS has committed several sexual batteries against PLAINTIFF,
20 as defined by Penal Code section 243.4.

21 99. As a direct and legal result of the wrongful conduct and/or omissions of Defendants
22 and DOES 1 through 100, and each of them, PLAINTIFF suffered, and continues to suffer, injuries
23 and damages including mental and emotional distress.

24 100. Defendants and DOES 1-100 despicable conduct was intended to cause injury to
25 PLAINTIFF and was carried out with a willful and conscious disregard of PLAINTIFF'S health and
26 safety. Defendants and DOES 1-100's conduct further subjected PLAINTIFF to cruel and unjust
27 hardship. Pursuant to Civil Code section 3294 and by virtue of the foregoing oppressive and malicious
28 conduct, Plaintiff is entitled to punitive damages.

1 **SIXTH CAUSE OF ACTION**

2 **NEGLIGENT SUPERVISION AND RETENTION/FAILURE TO WARN**

3 **(Against All DEFENDANTS and DOES 1-100)**

4 101. PLAINTIFF re-alleges and incorporates herein by reference each and every
5 allegation and statement contained in the prior paragraphs as though set forth here in full.

6 102. Defendants and DOES 1-00, inclusive, and each of them, and their agents, servants,
7 representatives, and or employees failed to properly hire, train, and supervise their employees and
8 agents.

9 103. By virtue of PLAINTIFF'S relationship with Defendants and DOES 1-00,
10 inclusive, and each of them, owed PLAINTIFF a duty not to retain COMBS, WALLACE, MACK
11 and DOES 51 through 100 given their dangerous and violent propensities, which Defendants and
12 DOES 1-00, inclusive, and each of them, knew or should have known about.

13 104. Defendants and DOES 1-00, inclusive, and each of them, also owed PLAINTIFF a
14 duty to provide reasonable supervision of COMBS, WALLACE, MACK and DOES 51 through
15 100, to use reasonable care to investigate COMBS, WALLACE, MACK and DOES 51 through
16 100, and to provide adequate warning to PLAINTIFF of COMBS, WALLACE, MACK and DOES
17 51 through 100's dangerous propensities.

18 105. Defendants and DOES 1-00, inclusive, and each of them, also owed PLAINTIFF a
19 duty of ordinary care for which they may be held vicariously liable.

20 106. Defendants and DOES 1-00, inclusive, and each of them, impliedly represented that
21 COMBS was not a sexual, physical, or psychological threat to PLAINTIFF.

22 107. At no time during the period of time alleged herein did DEFENDANTS and DOES
23 1-00, inclusive, and each of them, have in place a reasonable system or procedure to investigate,
24 supervise, and monitor its professional and paraprofessional staff, including COMBS WALLACE,
25 MACK and DOES 51 through 100, to prevent sexual assault, physical assault, sexual harassment,
26 battery, and threats or abuse of employees and contractors, nor did they implement a system or
27 procedure to oversee or monitor COMBS, WALLACE, MACK and DOES 51 through 100's
28 conduct.

1 existed between PLAINTIFF and Defendants and DOES 1 through 100, inclusive, and each of
2 them.

3 114. Defendant COMBS made sexual advances and/or engaged in other conduct of a
4 sexual nature or of a hostile nature based on gender that was unwelcome and pervasive or severe.

5 115. Defendants and DOES 1 through 100, inclusive, and each of them, knew or should
6 have known of the misconduct and sexually predatory behavior of COMBS directed at the general
7 public.

8 116. Despite having knowledge of the sexual harassment of COMBS, Defendants and
9 DOES 1 through 100, inclusive, and each of them, acted with deliberate indifference and approved
10 or otherwise ratified COMBS conduct by failing to take any action to control, curb, and/or prevent
11 that conduct.

12 117. As direct and legal result of the acts and omissions of Defendants and DOES 1
13 through 100, inclusive, and each of them Plaintiff suffered injuries including, but not limited to,
14 physical injuries, mental pain and suffering, emotional distress, past and future costs of medical
15 care and treatment, past and future loss of earnings and/or earning capacity, and other economic and
16 non-economic damages in an amount not yet ascertained, but which exceeded the minimum
17 jurisdictional limits of this Court.

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff JOHN DOE prays for judgment against Defendants and DOES 1-
3 100, as follows:

- 4 1. For an award of special and general damage, in excess of the jurisdictional minimum,
5 according to proof;
6 2. For an award of exemplary damages against, according to proof;
7 3. For prejudgment interest, according to proof;
8 4. For costs of suit incurred herein, according to proof;
9 5. For attorney's fees pursuant to Code of Civil Procedure §1021.5; and
10 6. For any other and further relief as the Court deems just and proper.

11
12 DATED: July 7, 2025

DORDICK LAW CORPORATION

13
14 By: 

15 Katrina R. Ejden, Esq.
16 Gary A. Dordick, Esq.
17 Attorneys for Plaintiff
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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.

DATED: July 7, 2025

DORDICK LAW CORPORATION

By: 

Katrina R. Eiden, Esq.
Gary A. Dordick, Esq.
Attorneys for Plaintiff