

2. Of course, Defendant had to know her story was false because Plaintiff was in Louisiana filming a movie at the time of the incident. Nevertheless, in a theatrical display aimed at grabbing the attention of the media and generating sympathy from the public, Defendant continued to repeat these baseless claims. By her intentional and reckless conduct, Defendant has caused substantial harm to Plaintiff, in complete disregard of the truth. This suit seeks to set the record straight and obtain recompense for the injuries suffered by Plaintiff as a result of Defendant's conduct.

II. PARTIES

3. Plaintiff Curtis James Jackson III, professionally known as "50 Cent," resides in Hartford County, Connecticut. Plaintiff is one of the most well-recognized, and respected, rap musicians alive today. Plaintiff previously dated Defendant. They have a young child together named Marquise.

4. Upon information and belief, Defendant resides in the State of New York.

III. JURISDICTION AND VENUE

5. Jurisdiction in the Superior Court of the State of Connecticut because the tortious acts alleged herein were committed in Connecticut by way of communications sent into Connecticut and received in Connecticut. Further, the tortious acts alleged herein were intentionally and expressly aimed at Connecticut and the Defendant knew that the brunt of the injury would be felt by the Plaintiff whom she knew resides in Connecticut.

6. Venue is proper in the Judicial District of Hartford because Plaintiff resides in Hartford County.

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IV. THE FALSE AND DEFAMATORY STATEMENTS

7. In or about January 2007, Plaintiff purchased a home in Dix Hills, New York (the “Home”). Defendant, Marquise, Defendant’s daughter and possibly others with whom Defendant had a personal relationship.

8. At or around 5:00 a.m. on May 30, 2008—while Plaintiff was in Louisiana filming a movie—the Home caught fire and burned down. Six people, including 10 year-old Marquise, were in the house at the time. They all were transported to the hospital and briefly treated for smoke inhalation. Fortunately, no one was seriously injured.

9. Thereafter, Defendant engaged on a deliberate campaign of spreading falsehoods to the media concerning Plaintiff by repeatedly claiming that Plaintiff was responsible for the Home burning down and that he had attempted to kill Defendant and Marquise.

10. For example, just hours after the fire had destroyed the Home, Defendant stood outside the ruins of the Home and dramatically informed members of the press that: “[Plaintiff] tried to kill me and his own child. I know this came from 50 Cent. I know he did it.” Defendant also stated: “Who do I think did it? Curtis Jackson.” She continued: “He threatened me on Monday that he was going to have someone visit me. My kids are in the house. Who would try to kill your own kids?” The statements attributed to Defendant in quotations are herein referred to as the “Defamatory Statements”.

11. All of the Defamatory Statements are utterly and completely false. Plaintiff did not burn down the Home nor did he encourage others to do so. The suggestion that Plaintiff

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would deliberately attempt to kill his own family members is false, gruesome and abhorrent. Indeed, police in the county where Plaintiff's Home burnt down have confirmed that Plaintiff is not presently a suspect.

12. Adding insult to injury, the Defamatory Statements have been repeated and republished throughout the world in various media, including print publications, broadcast and online (the "Republications"). The Defamatory Statements were sent to, and received in, Connecticut when they were repeated and republished in Connecticut media outlets and online Republications were accessed by people in Connecticut.

COUNT ONE: (False Light Invasion of Privacy)

1-12. Plaintiff and realleges each and every allegation contained in Paragraphs 1 through 12, inclusive, above, as if fully set forth herein.

13. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son were widely publicized by Defendant.

14. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son are false.

15. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, are of and concerning Plaintiff and persons who saw, heard or read about the Defamatory

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Statements or the accusations reasonably understood the references therein to be references to Plaintiff.

16. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son were understood in such a way as to place Plaintiff in a false light which would be highly offensive to a reasonable person.

17. Upon information and belief, the Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, were made by the Defendant with malice, with knowledge of their falsity, or with reckless disregard for their truth or falsity.

18. Upon information and belief, the Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, were made by Defendant with knowledge of the false light into which they would place Plaintiff, or with reckless disregard as to the false light into which they would place Plaintiff.

19. As a direct and proximate result of the above-described conduct by Defendant, Plaintiff has suffered general and special damages in an amount to be determined at trial but believed to be no less than Twenty Million Dollars (\$20,000,000.00), including without limitation, damage to Plaintiff's reputation, career and standing in the community.

20. Unless enjoined and restrained by the Court, Plaintiff believes that Defendant will republish, repeat and continue to disseminate the Defamatory Statements and the

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accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, all to the continuing injury of Plaintiff; that such continued republication, repetition and dissemination of the defamatory and offensive falsehoods will cause irreparable harm to Plaintiff by damaging his reputation and adversely affecting his career and business efforts as well as his personal relationships.

21. Plaintiff is informed and believes, and based thereon alleges, that he lacks an adequate remedy at law insofar as damages will be very difficult to calculate for such on-going injuries. By reason of the foregoing, Plaintiff is entitled to a permanent injunction enjoining and restraining Defendant, and all persons acting in concert with her, from republishing, repeating, distributing or otherwise disseminating the Defamatory Statements and the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son.

COUNT TWO: (Slander Per Se)

1-21. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 21, inclusive, above, as if fully set forth herein.

22. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, are false.

23. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his

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son, are of and concerning Plaintiff and persons who saw, heard or read about the Defamatory Statements reasonably understood the references therein to be references to Plaintiff.

24. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, are defamatory of Plaintiff on their face and necessarily expose him to hatred, contempt, ridicule and obloquy, and/or cause him to be shunned or avoided and tend to injure him in his occupation.

25. The Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, are defamatory of Plaintiff on their face in that they falsely accuse Plaintiff of a crime involving moral turpitude or to which an infamous penalty is attached.

26. Upon information and belief, the Defamatory Statements as a whole and each of the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, were made by the Defendant with malice, knowledge of their falsity, or with reckless disregard for their truth or falsity.

27. Defendant's conduct resulted in the Republications which caused additional and further damage to Plaintiff.

28. As a direct and proximate result of the above-described conduct by Defendant, Plaintiff has suffered general and special damages in an amount to be determined at trial but believed to be no less than Twenty Million Dollars (\$20,000,000.00), including without limitation, damage to Plaintiff's reputation, career and standing in the community.

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29. Unless enjoined and restrained by the Court, Plaintiff believes that Defendant will republish, repeat and continue to disseminate the Defamatory Statements and the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son, all to the continuing injury of Plaintiff; that such continued republication, repetition and dissemination of the defamatory and offensive falsehoods will cause irreparable harm to Plaintiff by damaging his reputation and adversely affecting his career and business efforts as well as his personal relationships.

30. Plaintiff is informed and believes, and based thereon alleges, that he lacks an adequate remedy at law insofar as damages will be very difficult to calculate for such on-going injuries. By reason of the foregoing, Plaintiff is entitled to a permanent injunction enjoining and restraining Defendant, and all persons acting in concert with her, from republishing, repeating, distributing or otherwise disseminating the Defamatory Statements and the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son.

WHEREFORE, Plaintiff seeks:

1. Actual and compensatory damages in an amount to be determined at the trial of this action, but believed not to be less than Twenty Million Dollars (\$20,000,000.00);
2. Exemplary and punitive damages;
3. A permanent injunction enjoining and restraining Defendant, and all persons acting in concert with her, from republishing, repeating, distributing or otherwise disseminating

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the Defamatory Statements and the accusations that Plaintiff was involved in burning down the Home or attempting to kill family members, including his son;

- 4. Costs of suit herein incurred;
- 5. Reasonable attorneys' fees;
- 6. Interest on any monetary award to plaintiffs at the legal rate; and
- 7. Any other legal or equitable relief this Court deems just and proper.

THE PLAINTIFF,
CURTIS JAMES JACKSON, III

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