

Shawn R. Perez, Esq.  
Nevada Bar No. 10421  
**Law Offices of Shawn R. Perez**  
7121 W. Craig Road, #113-38  
Las Vegas, Nevada 89129  
(949) 492-9545 Telephone  
(702) 485-3977 Telephone  
[shawn711@msn.com](mailto:shawn711@msn.com)

Ariel Mitchell, Esq. (*pro hac vice*)  
**The Law Office of Ariel Mitchell, P.A.**  
500 NW 2nd Ave. #12864  
Miami, FL 33101  
Tel: (305) 903-5835  
[ariel@arielesq.com](mailto:ariel@arielesq.com)

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY PARHAM,  
JANE DOE, and  
JOHN DOE  
  
Plaintiffs,  
  
v.

Case No.: 3:24-cv-07191-RFL

**AMENDED COMPLAINT**

**DEMAND FOR JURY TRIAL**

SEAN COMBS a/k/a  
“P. Diddy,” “Puff Daddy,” “Love,”  
“Puffy” and “Diddy,”  
KRISTINA KHORRAM,  
SHANE PEARCE,  
RUBEN VALDEZ,  
JOHN PELLETIER,  
ODELL BECKHAM JR.,  
DREW DESBORDES a/k/a “Druski,”  
JACQUELYN WRIGHT a/k/a “Jaguar  
Wright”, HELENA HARRIS-SCOTT,  
MATIAS GONZALEZ,  
BRANDI CUNNINGHAM,  
JANICE COMBS,  
KEITH LUCKS a/k/a “Big Homie CC,”  
and JOHN and JANE DOES 1-10

Defendants.

**TRIGGER WARNING:  
THIS DOCUMENT CONTAINS HIGHLY GRAPHIC INFORMATION  
OF A SEXUAL NATURE INCLUDING ALLEGATIONS OF RAPE.  
SEXUAL ASSAULT. SEXUAL BATTERY. KIDNAPPING AND SEX  
TRAFFICKING.**

1 Plaintiff, Ashley Parham (“Parham”), John Doe and Jane Doe (“John Doe”) and  
2 (“Jane Doe”) (together, “Plaintiffs”) files there Complaint against Defendants Sean Combs  
3 (“Diddy”), Kristina Khorram (“KK”), Shane Pearce (“Shane”), Ruben Valdez (“Valdez”),  
4 John Pelletier (“Pelletier”), Odell Beckham Jr. (“Odell”), Drew Desbordes (“Druski”),  
5 Jacquelyn Wright (“Jaguar”), Helena Harris-Scott (“Helena”), Matias Gonzalez  
6 (“Gonzalez”), Brandi Cunningham (“Brandi”), Janice Combs (“Janice”), Keith Lucks  
7 (“Big Homie CC”) and John and Jane Does 1-10 (“Does”) (together, “Defendants”), allege  
8 as follows:  
9  
10

## 11 INTRODUCTION

- 12 1. This case involves RICO enterprise for the purpose of sexual assault, battery, rape,  
13 sexual abuse, false imprisonment and kidnapping for the personal and financial  
14 benefit to the enterprise participants.  
15
- 16 2. Defendant Diddy has been sued by countless individuals for crimes similar to the  
17 ones enumerated in this Complaint.  
18
- 19 3. Defendant Diddy is currently a federal inmate awaiting criminal trial for crimes  
20 similar to the ones enumerated in this Complaint.  
21
- 22 4. Defendant KK is an employee of Defendant Diddy often referred to by Defendant  
23 Diddy as his right-hand woman.  
24
- 25 5. Defendant Diddy’s predatory behavior was constant and was well known by several  
26 individuals including Defendant Diddy’s employees, staff, friends, family and  
27 associates. In fact, Defendant Diddy’s sons are being sued for engaging in the same  
28

1 type of deviant behavior as their father as plead in a Los Angeles Superior Court  
2 filing.<sup>1</sup>

- 3
- 4 6. Defendant Diddy was able to effectuate his crimes and evade capture and  
5 prosecution for his crimes for almost 30 years due to his position of power and  
6 influence in the entertainment industry. Defendant Diddy exploited his position and  
7 his relationships with powerful individuals to force sexual acts through exploitation,  
8 fear, manipulation, physical threats, emotional abuse, intimidation and retaliation.  
9
- 10 7. Had any of the previous victims of Defendant Diddy been taken seriously or had  
11 any of the abettors reported Defendant Diddy's actions to law enforcement,  
12 Defendant Diddy's illegal and unfathomable behavior could have been prevented.  
13 Instead, Defendant Diddy was able to reign his abuse and terrorism on countless  
14 victims for over 30 years.  
15
- 16 8. Additionally, had Defendant Diddy's numerous business partners and associates not  
17 ignored Defendant Diddy's deviant behavior, Defendant Diddy would have been  
18 unable to continue his pattern of abuse over such a long period of time.  
19
- 20 9. As alleged herein, Defendant Diddy abused his position of power in the  
21 entertainment industry to garner loyalty and trust from the public at large, and law  
22 enforcement, while instilling fear and intimidation in the hearts of his voluminous  
23 victims. Allegations against Defendant Diddy have been disregarded for decades  
24 therefore creating a failure to protect victims, like the Plaintiffs named herein.  
25  
26  
27

---

28 <sup>1</sup> Case number 24-ST-CV-08571

1 10. Unlike most victims of Defendant Diddy, who were employees, sex workers, or  
2 individuals seeking out Defendant to help launch their careers, Plaintiff Parham  
3 does not fall into any of those categories. Plaintiff Parham met Defendant Diddy due  
4 to happenstance and still ended up being brutally victimized, in a similar manner as  
5 described by the others who have proceeded her filing and others who surely will  
6 follow including Plaintiff Does herein.  
7

8 11. Plaintiffs John and Jane Doe met with Defendant Diddy through their connections in  
9 the music industry as Plaintiff John Doe was a previous Plaintiff against Michael  
10 Jackson for sexual assault as a minor.  
11

12 12. Due to Defendants agreement to participate in a corrupt enterprise, Plaintiffs and  
13 countless other victims have been immeasurably and permanently harmed. Plaintiffs  
14 allege as follows upon personal knowledge as to themselves and their own acts and  
15 experience, and, as to all other matters, upon information and belief, including  
16 investigations conducted by their attorneys.  
17

#### 18 **PARTIES**

19 13. Plaintiff Ashley Parham is an individual who resides in and is domiciled in  
20 California.  
21

22 14. Plaintiff John Doe is an individual who is domiciled in Nevada and resides in  
23 another state purposefully to protect his safety and identity.  
24

25 15. Plaintiff Jane Doe is an individual who is domiciled in Nevada and resides in  
26 another state purposefully to protect her safety and identity.  
27  
28

1 16. Defendant Sean Combs (Defendant “Diddy”) is an individual who resides in and is  
2 domiciled in California. Defendant also owns a residence in Florida. However,  
3 Defendant Diddy is currently an inmate at MDC in Brooklyn, NY.  
4



10  
11 17. Defendant Kristina Khorram (Defendant “KK”) is an individual who, upon  
12 information and belief, resides in and is domiciled in either California or North  
13 Carolina.  
14



22 18. Defendant Shane Pearce (Defendant “Shane”) is an individual who resides in and is  
23 domiciled in California.  
24



28 **Shane Pearce**

Restaurant Manager at Sir Francis Drake, A Kimpton Hotel

1 19. Defendant Ruben Lira Valdes (Defendant “Valdez”) is an individual who resides in  
2 and is domiciled in California.



10 20. Defendant John Lawrence Pelletier (Defendant “Pelletier”) is an individual who  
11 resides in and is domiciled in Nevada or Hawaii.



19 21. Defendant Odell Beckham Jr. (Defendant “Odell”) is an individual who resides in  
20 and is domiciled in Florida (previously referred to as John Doe in Plaintiff Parham’s  
21 original complaint).



1 22. Defendant Drew Desbordes (Defendant “Druski”) is an individual, who upon  
2 information and belief, resides in and is domiciled in either Maryland or Georgia  
3 (previously referred to as John Doe in Plaintiff Parham’s original complaint).  
4



11 23. Defendant Jacquelyn Wright (Defendant “Jaguar”) is an individual, who upon  
12 information and belief, resides in and is domiciled in California or Nevada.  
13

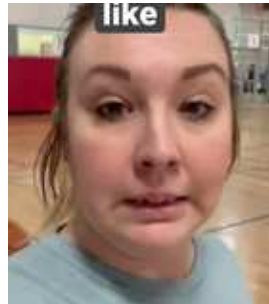


20 24. Defendant Helena Harris-Scott (Defendant “Helena”) is an individual, who upon  
21 information and belief, resides in and is domiciled in California.  
22



1 25. Defendant Matias Gonzalez (Defendant “Gonzalez”) is an individual, who upon  
2 information and belief, resides in and is domiciled in Nevada.

3 26. Defendant Brandi Cloninger Cunningham (Defendant “Brandi”) is an individual  
4 who upon information and belief resides in and is domiciled in Arkansas (previously  
5 referred to as Jane Doe in Plaintiff Parham’s original complaint).  
6



12 27. Defendant Janice Combs (Defendant “Janice”) is an individual who resides and is  
13 domiciled in Florida.  
14



20 28. Defendant Keith Lucks (Defendant “Big Homie CC”) is an individual who, upon  
21 information and belief, resides and is domiciled in Nevada.  
22



1 29. Defendant John and Jane Does 1-10 (Defendant “Does 1-10”) are individuals who,  
2 upon information and belief, reside in and are domiciled in various states but mainly  
3 California.  
4

5 **JURISDICTION, VENUE, TIMELINESS AND CALIFORNIA’S SEXUAL ABUSE**  
6 **AND COVER-UP ACCOUNTABILITY ACT**

7 30. This Court has federal question jurisdiction under 28 U.S.C. § 1331 and  
8 supplemental jurisdiction under 28 U.S.C. § 1367 for the State law claims alleged.

9 31. This Court has personal jurisdiction over all Defendants because they have  
10 purposely availed themselves, are residents of the State and/or were conducting  
11 business in California and this lawsuit arises out of acts that occurred in California  
12 and relates to their contacts with California. Further, the pervasive culture of abuse,  
13 including sexual assault, rape, inappropriate touching and wielding power and  
14 control over Plaintiffs were a constant presence when Defendant Diddy and the  
15 other herein named Defendants engaged in the acts described herein. The location of  
16 all the relevant events herein alleged occurred within the jurisdiction of California.  
17

18 32. Plaintiffs were harmed and injured in California by Defendants.  
19

20 33. Venue is proper in this judicial district under 28 U.S.C. § 1391, (b)–(c). Further,  
21 venue is proper in this judicial district pursuant to 18 U.S.C. §1965.  
22

23 34. This action is timely under Federal Racketeering Influenced and Corrupt  
24 Organization Act (RICO), 18 U.S.C. 1961 *et seq.*, as the Diddy Sexual Abuse and  
25 Cover Up Enterprise fraudulently concealed the ongoing sexual and deceitful  
26 activity, torts and conspiracy taking place within the Diddy Sexual Abuse and Cover  
27 Up and Enterprise.  
28

1 35. This action is also timely under California's Sexual Abuse and Cover Up  
 2 Accountability Act. California's Sexual Abuse and Cover Up Accountability Act  
 3 (AB-2777) amended California Civil Procedure Section 340.16, extending the  
 4 statute of limitations, opening up revival windows for adult survivors of sexual  
 5 assault and related claims and acknowledging that a "two-year statute of limitations  
 6 simply does not provide sexual assault survivors adequate time to heal from the  
 7 physical and emotional trauma of a sexual assault and prepare for a civil case."  
 8 California Bill Analysis, A.B. 2777 Assem., 6/14/2022.  
 9  
 10

11 (g) When the perpetrator is someone a victim trusts, it can take years for the  
 12 victim even to identify what happened to them as a sexual assault.

13 (h) For these reasons, it is self-evident that the unique nature of the emotional  
 14 and psychological consequences of sexual assault, especially on women, can  
 15 paradoxically permit wrongdoers to escape civil 26 accountability unless  
 16 statutes of limitation are crafted to prevent this injustice from occurring.

17 (i) Moreover, when these data are combined with widespread news reports of  
 18 major companies being accused of covering up sexual assaults by their  
 19 employees it is self-evident that statutes of limitation for sexual assault need  
 20 to be crafted in a way that does not cause the covering-up company to enjoy  
 21 the fruits of their cover-up solely because our statutes of limitation permit,  
 22 and thus motivate, such behavior.

23 Section 340.16(Sec. 2)(g-i).

24 36. Defendants' fraudulent concealment through active attempts of cover up caused the  
 25 ongoing trauma Plaintiffs suffer. Plaintiff Parham had repressed her experience until  
 26 recently when Defendant Diddy was accused by his ex-girlfriend, former employee  
 27 Cassie Ventura, and others regarding their experiences with Defendant Diddy.  
 28 Accessing the civil justice system allows victim-survivors an opportunity to seek  
 accountability for the years of suffering caused by the abuse they experienced and a

1 chance to take back the power they lost as a result of the sexual assault. Plaintiffs  
2 John and Jane Doe have been paralyzed in fear, have had to change their names and  
3 frequently move from their residences for fear of being rekidnapped, raped, abused  
4 and assaulted by Defendants herein. Plaintiff Does hereby invoke a pseudonym to  
5 protect their lives from the long reach of the Diddy Sexual Abuse and Cover Up and  
6 Enterprise.  
7

8  
9 37. Additionally, any statute of limitations applicable to the below claims, if any, is  
10 tolled and Defendants are estopped from raising such a defense as their actions  
11 described below deprived Plaintiff of the opportunity to commence this lawsuit  
12 before now, as well as other equitable and legal bases.  
13

#### 14 **FACTUAL ALLEGATIONS COMMON TO ALL COUNTS**

##### 15 **(Plaintiff Parham)**

16  
17 38. Plaintiff met Defendant Shane in February 2018, after an altercation with another  
18 man at a bar and Defendant Shane came to Plaintiff's rescue.

19  
20 39. While outside the bar, with friends and other patrons, Defendant Shane Facetime  
21 video called Defendant Diddy and was showing people Defendant Diddy in the  
22 video on his phone, attempting to impress the people with his famous friend.  
23

24 40. Defendant Shane then showed Plaintiff Defendant Diddy on his video call, which  
25 Plaintiff ignored, stating she was not impressed by him knowing Defendant Diddy  
26 because she believed Defendant Diddy had something to do with the murder of  
27 rapper Tupac Shakur.  
28

1 41. Visible in the Facetime call was Defendant Diddy, and some of his children  
2 including his sons Christian and Quincy. It appeared from the Plaintiff's perspective  
3 Defendant Diddy was having a "get together" at his home during the time of the  
4 Facetime call with Defendant Shane.  
5

6 42. Defendant Diddy heard Plaintiff's statement and made a remark that Plaintiff would  
7 "pay" for her statement regarding Tupac and overall dismissal of Defendant Diddy.  
8

9 43. On March 23, 2018, Defendant Shane invited Plaintiff over to his home to assist  
10 him with his cancer medications because he stated he was weak and unable to open  
11 his medications.  
12

13 44. Upon Plaintiff's arrival, Defendant Shane informed Plaintiff that he wanted to give  
14 her a ride in his new car. Plaintiff and Defendant Shane left his residence for a brief  
15 period and then returned.  
16

17 45. Once they returned, Defendant Shane left the door to his apartment partially open  
18 and stated that the door was ajar because there was an issue with the door where it  
19 couldn't close completely.  
20

21 46. Defendant Shane was renting an apartment on the lower floor of a home in Orinda,  
22 California.  
23

24 47. Defendant Shane had a separate entrance into his residence that led to the backyard  
25 of the home. The home also had a main entrance on Loma Vista Drive.  
26  
27  
28

1 48. Defendant Shane rented the home from a woman who lived in the upstairs portion  
2 of the home and had two dogs who resided with her.

3  
4 49. Plaintiff and Defendant Shane then began to watch a movie and Defendant Shane  
5 offered her a glass of water, which he retrieved and brought back to Plaintiff.

6  
7 50. Approximately ten minutes after Plaintiff and Defendant Shane returned from their  
8 drive, Defendant Diddy entered Defendant Shane's residence.

9  
10 51. Defendant Diddy entered the home in a grand "ready to party" manner. His  
11 grandiose entrance was so loud that the dogs upstairs began barking.

12  
13 52. Defendant Diddy did not enter the home through the backyard entrance but instead  
14 through the main entrance.

15  
16 53. Along with Defendant Diddy were his bodyguard Defendant Big Homie CC,  
17 Defendant KK, Defendant Brandi, Defendant Doe 2 who upon information and  
18 belief is a friend of Defendants Shane and Diddy and Defendant Diddy's driver,  
19 Doe 3, who remained outside and in his vehicle during the duration of Plaintiff's  
20 assault.

21  
22 54. Plaintiff believes Defendant Shane invited her over to "set her up" to be assaulted  
23 by Defendant Diddy because of the statement she made about Defendant Diddy a  
24 month prior.

25  
26 55. Upon Defendant Diddy's arrival he immediately began to antagonize the Plaintiff  
27 stating that "she thought she would never see him in person," "pay" for her  
28

1 statements about Tupac during the videocall and that Defendant Diddy “caught”  
2 Plaintiff.  
3

4 56. Plaintiff was in shock as she never believed that she would ever see or meet  
5 Defendant Diddy in real life let alone in the small apartment rented by Defendant  
6 Shane.  
7

8 57. Defendant Diddy then began advancing towards where Plaintiff was sitting on  
9 Defendant Shane’s bed with a knife and held it to the right side of Plaintiff’s face  
10 and threatened to give her a “Glasgow smile” in retaliation for her previous  
11 statements on the video call.  
12

13 58. Defendant KK told Defendant Diddy that she did not think giving Plaintiff a  
14 “Glasgow smile” would be advantageous to their potential clients who they could  
15 “sell” Plaintiff for sex to.  
16

17 59. Defendant KK then made a threat to Plaintiff that they could ship her off anywhere  
18 in the world and that she would never see her family or anyone she knew ever again.  
19

20 60. Defendant Shane then partially undressed Plaintiff then Defendant Diddy removed  
21 the remainder of Plaintiff’s clothing, removing the knife from her face and then  
22 retrieved a bottle of liquid from a large fanny pack.  
23

24 61. Defendant Diddy then squirted a bottle of liquid on Plaintiff which placed her in  
25 fear that she was being squirted with a chemical substance like acid. Plaintiff soon  
26  
27  
28

1 realized the substance was an oil/lubricant. Plaintiff was squirted with this liquid  
2 substance over the entirety of her naked body.

3  
4 62. Defendant KK was then told by Defendant Diddy to insert, what looked like a  
5 “syringe” from sterile packaging, into Plaintiff’s vagina.

6  
7 63. Defendant KK did as told, while assisted by Defendant Brandi,<sup>2</sup> and then told  
8 Defendant Diddy that they were unable to use the “IUD” because it had prematurely  
9 been released from its packaging.

10  
11 64. Defendant Diddy, upset by this, took the “syringe” from Defendant KK and tried  
12 inserting it in Plaintiff’s vagina instead.

13  
14 65. Defendant KK and Diddy began to argue as Defendant KK continued to advise  
15 Defendant Diddy that since the “IUD” had been prematurely released from its  
16 packaging it was no way they could insert it into Plaintiff’s vagina effectively. After  
17 some time, Defendant Diddy heeded the advice of Defendant KK and removed the  
18 syringe from Plaintiff’s vagina and handed it to Defendant KK.

19  
20 66. Defendants KK and Defendant Brandi then exited Defendant Shane’s residence  
21 leaving Plaintiff alone with Defendants Diddy, Shane and John Does who have been  
22 named herein.

23  
24  
25 67. Defendant Diddy then picked up a television remote that was near Plaintiff and  
26 violently inserted it into Plaintiff’s vagina.

27  
28 <sup>2</sup> Plaintiff, upon information and belief, believe Defendant Brandi to be a registered nurse with the NCSBN ID: 22517094.

1 68. Defendant Diddy, while violently raping Plaintiff with a television remote, told  
2 Plaintiff that her life was in his hands and that if he wanted he could “take her” and  
3 she would never be seen again.  
4

5 69. Plaintiff began hysterically crying from the threats by Defendant Diddy along with  
6 the pain of being violently vaginally raped by Defendant Diddy with the television  
7 remote as well as the lingering pain from the ordeal with the “IUD” syringe  
8 insertion.  
9

10 70. Defendant Diddy, then instructed Defendant Shane to turn Plaintiff on her stomach  
11 seemingly tired of hearing the Plaintiff’s blood curdling cries.  
12

13 71. Defendant Shane then grabbed Plaintiff by her abdomen and hips and turned  
14 Plaintiff on her stomach. Defendant Diddy then instructed Defendant Shane to put a  
15 pillow over her head because he didn’t want to see her face or hear her cries and  
16 instructed Defendant Shane to anally rape Plaintiff.  
17

18 72. Defendant Shane did as he was told by Defendant Diddy and began to anally rape  
19 Plaintiff.  
20

21 73. Defendant Diddy then violently raped Plaintiff anally after Defendant Shane.  
22

23 74. Defendant Doe 2 then joined Defendants Diddy and Shane taking a turn anally  
24 raping Plaintiff.  
25

26 75. Immediately after Defendant Doe 2 raped Plaintiff he exited Defendant Shane’s  
27 residence.  
28

1 76. Defendant Diddy then instructed another Defendant Doe to also rape Plaintiff;  
2 Defendant Doe has been determined to be Defendant Druski.

3  
4 77. Instead of immediately raping Plaintiff, Defendant Druski doused Plaintiff with  
5 more oil/lubricant and then jumped on top of Plaintiff's naked and oiled body  
6 treating it like a slip and slide and knocking the wind out of Plaintiff due to his  
7 enormous size.  
8

9 78. Defendant Druski then caught himself from sliding over Plaintiff's oiled body and  
10 off the bed, he then began raping Plaintiff vaginally.  
11

12 79. While Defendant Druski was raping Plaintiff, Defendant Diddy sat in a chair near  
13 the bed and began masturbating while recording Plaintiff's rape by Defendant  
14 Druski.  
15

16 80. Another party's phone fell on the bed near Plaintiff. Plaintiff then attempted to grab  
17 the phone but it slipped out of her hands and onto the floor due to the oil/lubricant  
18 that had been doused all over her person by Defendants Diddy and Druski.  
19

20 81. Defendant Diddy began laughing at Plaintiff's attempt to grab the phone.  
21

22 82. Throughout this violent gang rape Defendant Diddy made constant belittling  
23 remarks to Plaintiff including that he "owned her now."  
24

25 83. At some point during this ordeal, Plaintiff remembers Defendants referring to  
26 another Defendant Doe as Cornelius and remembered the name because it was so  
27  
28

1 odd and unique. Plaintiff has come to discover the Defendant Doe Cornelius who  
2 raped her was Defendant Odell.

3  
4 84. Plaintiff's body was becoming more and more limp over the course of the violent  
5 rape until eventually she had no control over her body nor could she move her body.

6  
7 85. When Defendant Druski finished raping Plaintiff, Defendant KK entered the room  
8 to examine the condition of Plaintiff who was barely able to move or control her  
9 bodily functions.

10  
11 86. Defendant KK examined Plaintiff to see if she needed assistance and was about to  
12 give Plaintiff an IV fluid. Plaintiff cannot be certain if she did or did not receive  
13 such intravenous intervention. Defendant KK then opened a different bag, different  
14 than the one Defendant Diddy removed the oil from, where Plaintiff observed  
15 several medicine bottles, IV fluid bags and other unidentifiable powder-like drugs.  
16 Defendant KK then removed a pill from one of the medicine bottles and gave it to  
17 Defendant Diddy.

18  
19  
20 87. Defendant Diddy then inserted the pill into Plaintiff's mouth and down her throat to  
21 where Plaintiff had no choice but to ingest the unknown pill.

22  
23 88. Defendants Diddy, Shane, KK, Odell and Druski then exited the residence to the  
24 backyard where they smoked marijuana and cigarettes.

25  
26 89. Plaintiff remained in an almost lifeless state in Defendant Shane's bedroom until she  
27 finally regained her bodily functions.  
28

1 90. Plaintiff then began looking for her clothes and her purse, that contained her car  
2 keys and cell phone, but could not discover them in the room or anywhere in the  
3 apartment. Plaintiff was only able to find a t-shirt on the floor which she put on to  
4 cover her naked body. Plaintiff also observed a black condom wrapper on the floor  
5 of the bedroom which she assumed was used by one of the Defendants, most likely  
6 Defendant Diddy, during the rape.  
7

8  
9 91. Plaintiff then found a knife, with the assistance of the Doe Plaintiffs, and headed to  
10 the backyard where the Defendants were smoking as that was the only way to exit  
11 the premises onto the street.  
12

13 92. Plaintiff concealed the knife on her left side as she exited the apartment to the  
14 backyard area.  
15

16 93. Upon coming to the exit of the home which led to the backyard, Plaintiff was met by  
17 Defendant Big Homie CC who was standing at the door between the residence and  
18 the backyard.  
19

20 94. By the time Plaintiff was able to compose herself and come to the backyard,  
21 Defendant KK was no longer in the backyard but upstairs on the patio/balcony with  
22 Defendant Brandi.  
23

24 95. Defendant Doe allowed Plaintiff to walk to the backyard where Defendants were  
25 still smoking.  
26  
27  
28

1 96. Defendant Doe did not see the knife that Plaintiff concealed on her left side as it was  
2 obstructed by the oversize t-shirt Plaintiff was wearing.

3  
4 97. Plaintiff observed Defendant Diddy still partially nude from the assault while the  
5 other Defendants had on their clothing.

6  
7 98. Defendant Shane then left to the upstairs portion of the patio/balcony where  
8 Defendants KK and Brandi were already situated.

9  
10 99. Plaintiff then sat down on a makeshift seat in the backyard when Defendant Diddy  
11 noticed her presence and remarked that he was surprised she was able to walk  
12 because he had given her “enough drugs to take out a horse.”

13  
14 100. Plaintiff then asked Defendant Diddy what he gave her and he laughed and  
15 did not provide a response.

16  
17 101. Defendant Diddy then made further comments to Plaintiff in a jovial,  
18 friendly, manner asking her why they hadn’t “partied” together before because it  
19 was “so much fun” and he “hadn’t had any ass that tight in a while.”

20  
21 102. Defendant Big Homie CC then quipped at Defendant Diddy that he probably  
22 hadn’t had any “ass that tight” because he’s not used to having anal sex with  
23 women, which Defendants Diddy and Doe laughed at.

24  
25 103. Plaintiff then told Defendant Diddy she did not party with him and she did  
26 not enjoy partying with him and that he raped her.  
27  
28

1 104. Defendant Diddy did not like Plaintiff's response to his lighthearted  
2 commentary and offered Plaintiff money and instructed Plaintiff to say that the  
3 violent rape was consensual and that Plaintiff was a sex worker.  
4

5 105. Plaintiff became enraged and yelled at Defendant Diddy that her rape was not  
6 consensual, she was not a sex worker and she refused to take any money from him  
7 and would tell the police that he had raped her.  
8

9 106. Defendant Diddy then told Plaintiff no one would ever believe she had been  
10 raped by him and if she did tell anyone such that they would harm her family.  
11

12 107. Defendant Big Homie CC then showed Plaintiff his phone which looked as if  
13 it was the outside of Plaintiff's, estranged, sister's residence as she could see her  
14 sister sitting on the couch and her sister's spouse on the balcony. It looked as if  
15 someone was outside the residence streaming this video to Defendant Big Homie  
16 CC's phone.  
17

18  
19 108. Plaintiff, while rattled by what she was seeing on Defendant Big Homie CC's  
20 phone, was still angry about being gang raped and was not complying with  
21 Defendant Diddy's request to take the money being offered to say the rape was  
22 consensual.  
23

24 109. Defendant Diddy then called Defendant Janice in an effort to further  
25 convince Plaintiff not to report her assault. Defendant Janice yelled at Plaintiff to  
26 not hurt her son. Plaintiff told Defendant Janice that her son had violently raped  
27 Plaintiff. Defendant Janice, seemingly unphased by the statement, then continued  
28

1 her demands with Plaintiff to take the money being offered and not report the rape  
2 to law enforcement.

3  
4 110. Defendant Diddy then made further threats that he had gotten off from bigger  
5 crimes than this and referred to Tupac again further antagonizing Plaintiff.

6  
7 111. Defendant Big Homie CC then turned to Defendant Diddy and pulled his gun  
8 on him asking him to repeat what he said in reference to Tupac.

9  
10 112. As the two of them were exchanging words Plaintiff went behind Defendant  
11 Big Homie CC where he seemingly began to protect Plaintiff.

12  
13 113. Defendant Big Homie CC then advanced to Defendant Diddy questioning  
14 him over the comments he made about Tupac.

15  
16 114. During this commotion, a neighbor directly across the street, came outside  
17 and peered into the backyard and asked what all the commotion was about.

18 Defendant Big Homie CC then pointed the gun at the neighbor and instructed him to  
19 mind his business and return to his residence.

20  
21 115. Defendant Big Homie CC then turned the gun back on Defendant Diddy.  
22 Plaintiff, not far behind Defendant Big Homie CC , tried to grab Defendant Big  
23 Homie CC's hand that had the gun. The gun then went off and hit a hill behind  
24 Defendant Shane's residence.

25  
26 116. Defendant Diddy then ran up the back stone stairs, near the hill in the  
27 backyard, towards where Defendants KK, Shane and Brandi were. Plaintiff charged  
28

1 towards Defendant Diddy moving the concealed knife from her left hand to her right  
2 hand and in pursuit of Defendant Diddy.

3  
4 117. Plaintiff then pushed Defendant Diddy from behind, while on the stone stairs  
5 outside, causing him to fall with his back to Plaintiff.

6  
7 118. Plaintiff then raised the knife, in a rage from the events that just transpired  
8 and with the intent of driving the knife into Defendant Diddy's back, when he  
9 turned around and began pleading for his life.

10  
11 119. Plaintiff, shocked now to see Defendant Diddy acting as a victim had a  
12 moment of clarity and then turned and ran down the outdoor stone staircase back out  
13 to the backyard to escape.

14  
15 120. Defendant Diddy then chased Plaintiff down the stairs and attempted to push  
16 her but she was already at the bottom of the stairs and gained her footing and  
17 wielded the knife at Defendant Diddy grazing his abdomen.

18  
19 121. Hearing the commotion, Defendants KK and Brandi emerged and Defendant  
20 KK then began administering first aid to Defendant Diddy for the injuries caused by  
21 Plaintiff.

22  
23 122. Plaintiff, tried to make quick dash for the exit but it was thwarted by another  
24 Defendant Doe. After a period of time, Plaintiff was able to abscond from  
25 Defendant Doe due to the first aid commotion with Defendant Diddy and was able  
26 to run down the street.  
27  
28

1       123.       Once Plaintiff made it on to the street she began yelling loudly for someone  
2               to call the police.

3  
4       124.       Defendant Doe, who had now caught up with Plaintiff, advised Plaintiff that  
5               he was an undercover cop. To this day Plaintiff is unsure of the truth or falsity of  
6               that statement.

7  
8       125.       The same neighbor then again emerged from his residence asking what was  
9               transpiring. Just as Plaintiff was attempting to answer, gun shots began being fired  
10              in Plaintiff's direction.

11  
12      126.       Plaintiff fled to a car near where the neighbor was also taking cover and lost  
13              sight of Defendant Doe.

14  
15      127.       Plaintiff then heard a SUV screeching and speeding leaving the residence.

16  
17      128.       Plaintiff then entered the home of the neighbor who informed her that he had  
18              already called police.

19  
20      129.       Plaintiff informed the neighbor that it was Sean Combs who had raped her  
21              and shot at them but the neighbor was unaware who Defendant Diddy was.

22  
23      130.       Shortly thereafter a Sheriff from the Contra Costa Sheriff's Department  
24              arrived at the neighbor's home.

25  
26      131.       Plaintiff identified the person who arrived at the neighbor's home posing as a  
27              Contra Costa Sheriff was Defendant Pelletier.

1 132. Plaintiff told Defendant Pelletier, believing he was a Sheriff from local  
2 police, she had been violently gang raped by Defendant Diddy and others and that  
3 she did not have her clothes, phone, purse, car keys or cell phone.  
4

5 133. Defendant Pelletier, falsely posing as a Contra Costa Sheriff, told Plaintiff  
6 and the neighbor that they had received several noise complaints prior to the  
7 neighbor's call and instructed Plaintiff to find a way to get home. The "Sheriff,"  
8 Defendant Pelletier, did not offer to take Plaintiff home, nor did he call for  
9 emergency services including an ambulance, nor any offer to take Plaintiff to the  
10 hospital, nor any offer to help Plaintiff recover her clothes or effects from Defendant  
11 Shane's residence.  
12  
13

14 134. The Contra Costa Sheriffs have confirmed that a police report was made that  
15 night by Plaintiff Parham.  
16

17 135. The Contra Costa Sheriffs have refused to release any information related to  
18 the complaint on the night in question to any source despite numerous attempts  
19 made via Freedom of Information Act.  
20

21 136. Plaintiff observed Defendant Pelletier hand something to the neighbor, what  
22 looked to be an envelope, at the door as Defendant Pelletier exited. The neighbor  
23 went to a nearby room and quickly returned empty-handed. Plaintiff believes the  
24 envelope contained cash.  
25  
26

27 137. The neighbor offered to let Plaintiff sleep on his couch until she could figure  
28 out a way to get her possessions and get home, but Plaintiff declined, uneasy and

1       unsure about the exchange with police and the neighbor and police, and only  
2       remained at the neighbor's residence for a short period of time once Defendant  
3       Pelletier, posing as Contra Costa law enforcement, left.  
4

5       138.       Plaintiff then went back to Defendant Shane's residence where she found the  
6       door open and her clothes were readily accessible in his residence.  
7

8       139.       Defendant Shane then emerged as if nothing had transpired and offered for  
9       Plaintiff to stay at his residence while she "slept it off."  
10

11       140.       Plaintiff asked for her purse and her keys but Defendant Shane told her she  
12       shouldn't leave in her condition and Plaintiff, catatonic and in the state of shock and  
13       disbelief of the events that transpired, stayed at Defendant Shane's home while  
14       Defendant Shane left the home.  
15

16       141.       Later that morning, Defendant Shane returned to the residence and woke  
17       Plaintiff up and finally gave her back her purse, cell phone and keys and Plaintiff  
18       left Defendant's residence.  
19

20       142.       In a daze, Plaintiff returned home and tried to make sense out of what  
21       happened to her.  
22

23       143.       On March 26, 2018, Plaintiff contacted her primary care doctor and asked for  
24       an HIV and STD test in fear of possibly having contracted a disease from her violent  
25       rape.  
26  
27  
28

1 144. Plaintiff tried to continue her life as she felt she wouldn't be believed as  
2 Plaintiff already had told what she believed to be Contra Costa Sheriffs Defendant  
3 Diddy raped her to no avail. Further, Plaintiff was under the impression if she did  
4 continue to say Defendant Diddy's name in relation to her assault she would not be  
5 believed and her family would be in danger.  
6

7  
8 145. Seemingly mere days, maybe even the day before Plaintiff's vicious rape,  
9 Defendant Shane had miraculously began driving a new car. Plaintiff believes this  
10 was payment by Defendant Diddy for setting up Plaintiff to be raped.  
11

12 146. Plaintiff went to the hospital where the hospital conducted several tests on  
13 Plaintiff including a rape kit, ultrasound and x-rays. Additionally, Plaintiff was  
14 given IV fluids to stabilize her vitals as she was in a severe weakened state from  
15 being unable to eat and losing a substantial amount of weight since the rape  
16 occurred.  
17

18 147. While at the hospital, Plaintiff told members of her treatment team about her  
19 horrific assault and they then contacted the Walnut Creek Police.  
20

21 148. Walnut Creek Police showed up to Plaintiff's hospital room and took a  
22 statement regarding her assault. Plaintiff only told Walnut Creek Police about the  
23 assault from Defendants Shane and Doe.  
24

25 149. Plaintiff believes her statements made to Walnut Creek police, while at the  
26 hospital, was captured by police body camera footage.  
27  
28

1 150. Plaintiff further believes her statements made on March 23<sup>rd</sup> immediately  
2 after the vicious assault, where Plaintiff named Defendant Diddy directly and by  
3 name, may be captured by body camera footage but upon determining the Sheriff  
4 was Defendant Pelletier does not believe it was captured as he was a co-conspirator.  
5

6 151. Plaintiff filed a report to the Orinda Police Department on April 17, 2018, but  
7 was too afraid to name Defendant Diddy as one of her assailants. During this report  
8 Plaintiff provided her clothing to the police from the night of the assault but they  
9 only retained her underwear. To date, the underwear was never returned and  
10 Plaintiff believes no investigation ever commenced.  
11

12 152. Plaintiff sought assistance from therapists in May 2018, one of which tried to  
13 have her therapy appointments covered by a victim's compensation fund which was  
14 rejected because Plaintiff was told no law enforcement agency had opened an active  
15 investigation into any of her many reports of her violent gang rape.  
16

17 153. Subsequently thereafter, Plaintiff asked police for a copy of her report from  
18 the Walnut Creek Police Department. On July 19, 2018, Plaintiff was provided a  
19 letter from the Walnut Creek Police Department stating that it was "unable to  
20 furnish this information as it is confidential and not subject to public release"  
21 despite Plaintiff not being the public and the victim/complainant.  
22

23 154. In March 2024, Plaintiff was retraumatized by all of the events surrounding  
24 Defendant Diddy including the several civil complaints filed against him as well as  
25 the raid on Defendant Diddy's California and Florida residences.  
26  
27  
28

1 155. Plaintiff called Contra Costa Sheriff's again in hopes of renewing her  
2 previous complaint and amending it to ensure Defendant Diddy's name was  
3 included. Plaintiff received no response from the Sheriff.  
4

5 156. Plaintiff, in July 2024, then emailed the Chief of the Sheriff's office  
6 regarding her complaint, lack of investigation and how she was treated by the initial  
7 responding officer. Plaintiff, then later received a call back from a Detective but  
8 then nothing further.  
9

10 157. Plaintiff then began seeking legal counsel for her claims ultimately being  
11 referred to undersign for representation.  
12

13 158. Undersign counsel also attempted to get a copy of the 2018 police report  
14 from Contra Costa Sheriff's but was told that they would not provide the report or  
15 any other information without a subpoena.  
16

17  
18 **(Plaintiffs John and Jane Does)**

19 159. Plaintiffs John and Jane Does are mother and son.  
20

21 160. Plaintiffs were taken from their Las Vegas residence by Defendant Pelletier  
22 as they walked to their vehicle.  
23

24 161. Defendant Pelletier put a gun to Plaintiff John Doe's back and instructed him  
25 to get into a black SUV regarding extraditing Plaintiffs for warrants to California.  
26  
27  
28

1 162. Plaintiffs did not have any warrants, nor convictions. Plaintiffs demanded to  
2 be shown the warrants and Defendant Pelletier refused and threatened to shoot  
3 Plaintiffs if they protested further.  
4

5 163. In the back of the black SUV was Defendant Valdez. Defendant was  
6 unknown to Plaintiffs at the time. Defendant was dressed in dark clothes and  
7 instructed Plaintiffs not to look at him.  
8

9 164. Plaintiffs were then transported to what they believe was Defendant  
10 Pelletier's residence at [REDACTED] Bay St., Las Vegas.  
11

12 165. Plaintiffs were ordered inside and brought into the living room and forced to  
13 sit on the couch and were physically restrained.  
14

15 166. Plaintiffs demanded to speak to their attorney which was refused, ignored or  
16 met with threats of violence. It became obvious to Plaintiffs that this was not a legal  
17 arrest, and that Pelletier was acting outside of color of law.  
18

19 167. At some point thereafter Plaintiffs were ordered back of a large black SUV.  
20

21 168. Defendant Gonzalez was given the keys to Plaintiffs vehicle, a SUV, to  
22 follow behind the SUV.  
23

24 169. Defendants Gonzalez and Pelletier had a list, which upon information and  
25 belief was a list of "safe houses" which they could allow parties a safe respite,  
26 undetected.  
27  
28

1 170. Defendant Pelletier appeared to be in charge and he and Defendant Valdez  
2 were both giving out orders to the other co-conspirator Defendants.  
3

4 171. Plaintiffs overhear repeated conversations, in the vehicle while being  
5 kidnapped and transported, about “following protocol” made by Defendant Pelletier  
6 to others.  
7

8 172. Upon information and belief, this “protocol” was agreed upon codes,  
9 including the use of communication apps like WhatsApp and/or SnapChat, satellite  
10 phones and referring to other co-conspirator Defendants by their middle names.  
11

12 173. It was apparent to Plaintiffs this was a professional operation/syndicate.  
13

14 174. Plaintiffs were then trafficked from Las Vegas, NV to various locations  
15 throughout California.  
16

17 175. The first location Plaintiffs were able to identify was in Danville, CA.  
18

19 176. In the convoy with the SUV Plaintiffs were placed in also included Plaintiffs  
20 SUV that was driven by Defendant Gonzalez.  
21

22 177. Upon information and belief, Defendant KK was in another SUV part of the  
23 convoy.  
24

25 178. At some point Defendant Gonzalez complained he had trouble keeping up  
26 with the convoy of black SUVs because the SUV ran poorly.  
27  
28

1 179. Plaintiffs allege the convoy drive was for numerous hours but the exact time  
2 was uncertain as they were unable to keep adequate track of time.

3  
4 180. The next location Plaintiffs were taken among the “safe houses” on their  
5 route to an unknown destination was [REDACTED] Way, Danville, CA 94506.

6  
7 181. Plaintiffs heard some altercation with the owners of the home not wanting to  
8 be involved with Defendants scheme. Plaintiffs attempted to plead to the owners for  
9 help and could not understand why they wouldn’t heed Plaintiffs cries for help.

10  
11 182. Plaintiffs heard the owners speak a foreign language which they believe was  
12 Farsi.

13  
14 183. Upon information and belief, this location was approximately twenty miles  
15 from the home in Orinda where Plaintiff Parham was assaulted.

16  
17 184. During the transportation of Plaintiffs across state lines, they were given  
18 water to drink, which Plaintiffs believe was drugged. Defendant Valdez would  
19 provide Plaintiffs the water which after drinking Plaintiffs would feel slightly  
20 euphoric, dizzy and then sick.

21  
22 185. Defendant Valdez would demand Plaintiffs drink the water but they refused  
23 and/or faked consumption.

24  
25 186. During the transportation Plaintiffs were forced to listen to a device with  
26 music similar to a device associated with Defendant KK’s nonprofit organization  
27 MusicBeatsHearts, in order to prevent Plaintiffs from eavesdropping on the  
28

1 Defendants conversations. At certain times the music stopped playing and Plaintiff  
2 John Doe was able to get the ear buds partially out of one ear, without Defendants  
3 noticing, to hear conversations about the plans they had for Plaintiffs.  
4

5 187. Plaintiffs were then taken to another location at [REDACTED] Blvd., El  
6 Cerrito, CA 94530.  
7

8 188. Plaintiffs were able to keep track of their location by remembering cross  
9 streets when they were finally let out of the vehicle for stops.  
10

11 189. At this location Plaintiffs observed a RV (recreational vehicle) arrive at the  
12 residence.  
13

14 190. During this stop is when Plaintiffs noticed Defendant KK was a part of the  
15 convoy.  
16

17 191. At this stop, Plaintiffs overheard Defendant KK, being referred to as her code  
18 name, believed to be her middle name Natasha, discussing visiting the UC Berkley  
19 campus as Defendant seemed very familiar with the area and familiar with the city.  
20

21 192. Upon information and belief, this location was approximately seven miles  
22 from the home in Orinda where Plaintiffs were assaulted.  
23

24 193. Plaintiffs were then taken to another location at The Beacon Grand Hotel (Sir  
25 Francis Drake).  
26

27 194. Defendant Shane worked at the hotel as a manager.  
28

1 195. Plaintiffs were taken into the hotel through what appeared to be the side  
2 entrance, by Defendants Valdez, Pelletier and Gonzalez.

3  
4 196. Defendant Pelletier told the co-conspirator Defendants he would stay at a  
5 different hotel nearby, so it wouldn't be linked to him.

6  
7 197. Once inside the hotel room, Plaintiffs were beaten and drugged by  
8 Defendants Valdez and Gonzalez. Plaintiffs pleaded with Valdez and Gonzalez to be  
9 released and for mercy.

10  
11 198. Defendants Valdez and Gonzalez instructed Plaintiffs to sign paperwork, at  
12 gun point. When Plaintiffs refused Defendant Gonzalez would pistol whip Plaintiffs  
13 on the back of their heads.

14  
15 199. Defendant Gonzalez eventually gave Plaintiffs a drink which caused them to  
16 pass out.

17  
18 200. Plaintiffs spent the night at the hotel with Defendants Gonzalez and Valdez,  
19 taking turns watching them.

20  
21 201. The next morning, Plaintiffs were restrained and bound by their hands in  
22 front and were placed into a vehicle. Plaintiffs then saw Defendants Jaguar and  
23 Helena.

24  
25 202. Upon information and belief, Defendants Jaguar and Helena were in a small  
26 sedan, light color, white or beige.

1       203.       Plaintiffs were then transported to the location of Plaintiff Parham's brutal  
2                assault on Loma Vista Drive by Defendants Jaguar and Helena.

3  
4       204.       Defendant Helena was the driver and Defendant Jaguar was the passenger.

5  
6       205.       Defendant Helena warned Plaintiffs if they tried to escape or run that she  
7                would "have to shoot you."

8  
9       206.       Defendant Helena also warned Plaintiffs not to throw up her vehicle, saying  
10               "you better not throw up in my car or get sick."

11       207.       Defendant Helena mentioned having two partners as backup who were  
12                bounty hunters.

13  
14       208.       Plaintiffs were familiar with Defendant Helena as she had filed a lawsuit  
15                against superstar singer Michael Jackson in 2005 and filed a creditors claim against  
16                the Jackson estate upon his untimely demise in 2009.

17  
18       209.       Plaintiffs were familiar with Defendant Helena from her previous Michael  
19                Jackson lawsuits and had previously met with Defendant at her home in West  
20                Hollywood to determine the credibility of her claims and if they were similar in  
21                nature to Plaintiffs.  
22

23  
24       210.       Plaintiffs had reported Defendant Helena multiple times to the LA and OC  
25                FBI field offices, for her role in the crime syndicate with Defendants Pelletier,  
26                Valdez and other individuals.  
27  
28

1       211.       Plaintiffs attempted to make conversation with Defendant Helena in which  
2               she admitted she was the same person who Plaintiffs had met with previously.

3  
4       212.       Defendant Jaguar, aggravated, stated “You let them know who you are?  
5               That’s really great.”

6  
7       213.       Plaintiffs noticed Defendants had large brown bags and manila envelopes full  
8               of cash that was banded. It appeared they were separating the large sums of cash to  
9               distribute as they were placing cash into the manila envelopes.

10  
11       214.       Defendant Jaguar discussed with Defendant Helena how the parties started  
12               the first black owned network. Upon information and belief, Plaintiffs believe that  
13               network to be Revolt TV.

14  
15       215.       Defendant Jaguar and Defendant Helena discussed the other co-conspirators  
16               but referred to them by their middle names Natasha (Defendant KK), Pedro  
17               (Defendant Gonzalez), Lira (Defendant Valdez), Cornelius (Defendant Odell) and  
18               Larry shortened for Lawrence (Defendant Pelletier).

19  
20       216.       When Defendant Jaguar said Cornelius it upset Defendant Helena who said  
21               that Defendants Odell and Druski were her clients, and nothing better happen to  
22               them, and Plaintiffs better not say anything about them, or she would have Plaintiffs  
23               killed.

24  
25  
26       217.       Defendant Jaguar then told Plaintiffs they were being taken to meet John.  
27               Plaintiffs now know that was referring to Defendant Diddy.

1       218.       When Defendants arrived with Plaintiffs at the Loma Vista location it  
2               appeared as they were waiting and coordinating for others to arrive.

3  
4       219.       A large sedan arrived and Plaintiffs were were placed in the back with  
5               Defendant Valdez. Defendant Pelletier was driving.

6  
7       220.       Plaintiffs then arrived at a short driveway / curb.

8  
9       221.       Plaintiff remembers looking for intersecting street sign at this location and  
10              found [REDACTED], a dead-end street off of Loma Vista Drive. Plaintiff John Doe  
11              repeated the name of the street to himself so he remembered and was able to  
12              whisper into Jane Doe's ear to remember the intersecting street name, [REDACTED].

13  
14      222.       Plaintiffs believed this was the home they would be murdered in and tried to  
15              devise a plan for escape.

16  
17      223.       Plaintiffs were brought into the house and into the kitchen where they were  
18              watched by Defendant Gonzalez.

19  
20      224.       Plaintiffs repeated their pleas to Defendant Gonzalez to be released and for  
21              mercy which he replied, "there's nothing [he] can do."

22  
23      225.       Plaintiffs could hear other people inside the home, and tried to listen to  
24              understand what was happening which included a woman's scream.

25  
26      226.       Eventually, Plaintiffs were lead deeper into the home where they encountered  
27              more individuals including Defendant Diddy.

1       227.       Plaintiffs observed several individuals gathered around a bed while  
2               Defendants Gonzalez and Valdez stood outer guard.

3  
4       228.       Plaintiffs observed Defendants Jaguar and Helena enter the residence.

5       229.       Defendant Jaguar told Plaintiffs, “He wants something you have. If I were  
6               you, I'd figure out what it is really fast.” The “he” Defendant was referring to is  
7               believed to be Defendant Diddy.

8  
9       230.       Shortly after, Defendant Druski appeared wearing a vest and shorts, and he  
10              engaged in conversation with Plaintiffs. Plaintiffs tried to appeal to Defendant by  
11              talking about the music industry and Defendant instructed Plaintiffs that they should  
12              cooperate.

13  
14  
15       231.       Plaintiffs describe what they observed during the assault of Plaintiff Parham  
16              after this interaction with Defendant Druski.

17  
18       232.       Plaintiffs observed Plaintiff Parham having an IUD forcefully placed in her  
19              vagina by Defendants KK with the assistance of Defendant Brandi.

20  
21       233.       Plaintiffs heard Defendant KK make a remark about how Plaintiff Jane Doe  
22              would not need an IUD because of her age.

23  
24       234.       While hearing Plaintiff Parham scream in agony during the forced IUD  
25              insertion Plaintiff Jane Doe yelled “stop hurting her!”

26  
27       235.       Plaintiffs observed Defendant Shane place a pillow over Plaintiff Parham’s  
28              face suffocating her and Plaintiff Jane Doe yelled for them to stop or that she would

1 die. Plaintiff Jane Doe believes Plaintiff Parham did lose consciousness because she  
2 became limp and unresponsive.

3  
4 236. Defendant Diddy instructed Defendant Valdez to “shut her up,” and  
5 Defendant Valdez hit Plaintiff Jane Doe with the handle of his firearm.

6  
7 237. Plaintiff John Doe witnessed Plaintiff Parham being assaulted by the remote  
8 and when he tried to say something Plaintiff was told to shut up or they would put  
9 the remote in him next.

10  
11 238. Plaintiff John Doe believes he heard Defendant Jaguar make remarks, “Put  
12 that remote in her!”, “She’s going to learn today!” and telling Plaintiff Parham that  
13 she was “going to make it worse!”

14  
15 239. Plaintiffs believe the remote assault was to punish Plaintiff Parham for the  
16 IUD failure.

17  
18 240. Plaintiffs heard Defendant KK remark to Defendants Diddy and Druski that  
19 she needed to keep them sufficiently drugged and revealed a bag full of drugs and  
20 paraphernalia. Defendant KK appeared to be disbursing ‘doses’ to Defendants  
21 asking them their weights to administer the proper amount.

22  
23 241. At some point Plaintiff John Doe was taken to the bathroom. While in the  
24 bathroom he believed there may have been other tenants and began to bang on the  
25 walls hoping someone would hear him but the only person who heard him was  
26 Defendants Valdez and Gonzalez who were outside keeping watch.

27  
28 242. Upon Plaintiff John Doe’s return he saw Defendant Odell.

1       243.       Plaintiff John Doe took immediate notice of Defendant Odell because when  
2               he took his clothes off Plaintiff remembers Defendant being in great shape,  
3               especially in comparison to the naked bodies of Defendants Diddy and Druski.

4  
5       244.       Plaintiff John Doe overheard Defendant Diddy and Odell discussing business  
6               and the plan to have Plaintiff Parham return to New York with Defendant Odell.

7       245.       Plaintiff John Doe could not readily observe where Plaintiff Jane Doe was  
8               during this time.

9  
10      246.       While during this time where Plaintiff Jane Doe was out of the sight of  
11              Plaintiff John Doe, Plaintiff Jane Doe was being sexually assaulted by Defendant  
12              Valdez in another room.

13      247.       Plaintiff John Doe witnessed the gang rape of Plaintiff Parham.

14  
15      248.       Plaintiff Jane Doe witnessed the gang rape of Plaintiff Parham.

16      249.       Plaintiff John Doe witnessed Defendant Druski douse Plaintiff Parham in  
17              baby oil and then jumped and slid across her body.

18      250.       Plaintiff John Doe observed Defendants Diddy and Druski manically and  
19              hysterically laughing, which Plaintiff attributed to their drug use.

20  
21      251.       Defendant Diddy then attempted to force Plaintiff John Doe to also assault  
22              Plaintiff Parham and he refused.

23      252.       Defendant Diddy instructed Defendant co-conspirators to throw Plaintiff  
24              John Doe into the wall several times in order to get him to comply with his demand  
25              to rape Plaintiff Parham, which he would not comply.

26  
27      253.       Defendant Diddy instructed Defendant co-conspirators to yank, grab and pull  
28

1 at Plaintiff John Doe's genitals violently in an effort to punish him for not  
2 participating in the gang rape of Plaintiff Parham. Plaintiff John Doe remembers  
3 Defendant Big Homie CC saying he was going to look for pliers to use to further  
4 torture Plaintiff.  
5

6 254. Plaintiff John Doe believes Defendant Diddy wanted Plaintiff to rape  
7 Plaintiff Parham so they could frame him in the event Plaintiff Parham reported her  
8 assault.  
9

10 255. In an effort to get DNA from Plaintiff John Doe to place on Plaintiff Parham,  
11 Defendant Diddy had one of the Defendant co-conspirators orally copulate Plaintiff  
12 John Doe to get semen from him but it failed.  
13

14 256. Plaintiff Jane Doe observed Defendant KK return to the room to check on  
15 Plaintiff Parham and providing her an IV telling her to "breathe deeply."  
16

17 257. Plaintiff John Doe watched Plaintiff Parham lose consciousness.  
18

19 258. At some point Plaintiff Jane Doe returns after Defendants Diddy, Shane,  
20 Druski, Odell, KK and others leave the home and retire to either the backyard or to  
21 the upstairs patio. Plaintiffs were left alone and unattended with an unconscious  
22 Plaintiff Parham.  
23

24 259. Plaintiffs were crying after observing the assault upon Plaintiff Parham and  
25 began to realize this was their next chance to devise a plan for escape.  
26

27 260. Plaintiffs began looking for weapons and exit points to make their escape.  
28

261. Plaintiffs could not find any phones or any weapons, like knives in the  
kitchen as it appeared all the cutlery and silverware had been removed from the

1 home.

2 262. Plaintiffs were trying to act quickly while the Defendants left them  
3 unattended and were outside smoking, drinking and loudly laughing as if having a  
4 party.  
5

6 263. Plaintiffs observed others outside believed to be Defendant Diddy's sons  
7 Christian and Quincy. Plaintiffs observed them "roughhousing" and practicing lay-  
8 up/ basketball moves.  
9

10 264. Plaintiffs heard Defendant Diddy tell his sons to watch the gate and make  
11 sure no one left.

12 265. Plaintiffs observed Defendant Gonzalez outside the front door where the  
13 front door was barricaded by yellow "crime scene" like tape. The door lock was  
14 unusual because it was facing backwards, needing the key to exit.  
15

16 266. Fearing no way to escape, Plaintiff Jane Doe mentioned to Plaintiff John Doe  
17 that she overheard them say "put it on top of the refrigerator" and instructed  
18 Plaintiff John Doe to check to see if there was anything on top of the refrigerator.  
19

20 267. Plaintiff John Doe found a knife on top of the refrigerator in the kitchen.

21 268. Plaintiffs then heard ramblings from the room Plaintiff Parham was in and  
22 went in to check on her and to stop her from making too much noise that could  
23 thwart their escape plan.  
24

25 269. Plaintiffs told Plaintiff Parham they "weren't going to hurt her," and that they  
26 were "here to help." Plaintiff Parham, just now coming into consciousness and being  
27 horrifically gang raped, was upset, terrified and unsure if Plaintiffs were trying to  
28

1 help or were also co-conspirators.

2 270. Plaintiffs eventually were able to get Plaintiff Parham to calm down and  
3 listen to their escape plan.  
4

5 271. Plaintiffs told Plaintiff Parham they could not find an exit to escape and  
6 needed her help to escape otherwise they would all be killed.

7 272. Plaintiff Parham, after experiencing her ordeal with Defendants, believed  
8 Plaintiffs and agreed to help in an escape.  
9

10 273. Plaintiffs told Plaintiff Parham they had found a knife and that her assailants  
11 were in the backyard which was believed to be the best exit for escape.

12 274. Plaintiff Parham then exited the home with the knife concealed to the  
13 backyard.  
14

15 275. Shortly thereafter, Defendant KK returned and took Plaintiff Jane Doe to the  
16 balcony, leaving Plaintiff John Doe alone in the residence. Plaintiffs believed  
17 Defendant KK did not check the residence because she believed Plaintiff Parham  
18 was still unconscious.  
19

20 276. While on the balcony, Defendant KK demanded Plaintiff Jane Doe sign  
21 documents. When Plaintiff refused Defendant yelled, to at least two Doe  
22 bodyguards, Plaintiff would not sign and asked them to assist.

23 277. Plaintiffs believe the documents were related to creditors claims Plaintiffs  
24 had against the Michael Jackson estate.  
25

26 278. During this interaction parties hear a gunshot which causes everyone to run  
27 towards the backyard where the shot came from.  
28

1       279.       Plaintiff John Doe, who was left alone and unattended, was able to reach the  
2               stairs where he saw Plaintiff Parham with the knife looking as if she was about to  
3               stab Defendant Diddy and he yelled out “do it, stab him!” but he saw Plaintiff  
4               Parham hesitate.  
5

6       280.       Plaintiff John Doe observed Defendant Diddy push Plaintiff Parham down at  
7               the bottom of the stairs and Plaintiff John Doe believes he assisted her up.  
8

9       281.       Plaintiffs were briefly then reunited and Plaintiff John Doe told Plaintiff Jane  
10              Doe now was their opportunity to escape.

11      282.       Following Plaintiff Parham, Plaintiffs ran out the back gate onto the street  
12              and in the opposite direction of Plaintiff Parham.  
13

14      283.       Plaintiffs arrived at the house next door to the residence and banged on the  
15              door and yelled for help. The wife came out and said that she and her husband  
16              couldn’t help. Plaintiffs found the exchange bizarre and could not understand why  
17              they would not help or call 911.  
18

19      284.       Plaintiffs were able to then try to hide until they saw an officer report to the  
20              location where they attempted to speak with the officer.

21      285.       Before Plaintiffs were able to speak to the local officer Defendant Pelletier  
22              appeared and obstructed Plaintiffs from speaking to the responding officer telling  
23              the responding officer a Federal investigation was ongoing and not to interfere.  
24

25      286.       Defendant Pelletier told the officer to turn off his body camera. Defendant  
26              Pelletier told the officer he was working on a case for drug trafficking and had the  
27              house under surveillance and would report later to the local precinct. Defendant  
28

1 Pelletier referred to Plaintiffs and Plaintiff Parham as suspects and said they were  
2 homeless.

3 287. When Plaintiffs tried to refute these statements by Defendant Pelletier they  
4 were threatened and told to shut up and remain quiet.  
5

6 288. Defendant Gonzalez then transports and removes Plaintiffs from the  
7 interaction with Defendant Pelletier and the responding officer.

8 289. Defendant Gonzalez placed Plaintiffs in another vehicle, which was hard to  
9 see due to the darkness.  
10

11 290. Plaintiff Jane Doe pleaded with Defendant Gonzalez to let them go and that  
12 she would not tell. In a last-ditch effort, Plaintiff told Defendant she overheard  
13 Defendants Jaguar and Helena say they were not going to pay him and that there  
14 was not enough money for him.  
15

16 291. Unbeknownst to Plaintiffs, Defendants Jaguar and Helena were in a nearby  
17 vehicle.  
18

19 292. Defendant Gonzalez exited the vehicle and went to the vehicle with  
20 Defendants Jaguar and Helena and confronted them about what Plaintiff Jane Doe  
21 said.

22 293. Defendant Gonzalez returned to the vehicle where Plaintiffs were being held,  
23 seemingly confirming what Plaintiff Jane Doe said because Plaintiffs heard him use  
24 the Spanish term “mayate” which is often used as a slur towards black people.  
25

26 294. Defendant Gonzalez then walked Plaintiffs to a nearby street where the SUV  
27 was parked and gave Plaintiffs the keys to the vehicle and released them.  
28



1       302.       The Diddy Sexual Abuse and Cover Up Enterprise is an association-in-fact  
2       within the meaning of 18 U.S.C. § 1961(4) consisting of: (i) Defendants, including  
3       each of their employees and agents; and (ii) the Diddy Sexual Abuse and Cover Up  
4       Enterprise Participants, including but not limited to the Defendants enumerated  
5       herein.

7       303.       As set forth above, the Diddy Sexual Abuse and Cover Up Enterprise was  
8       designed and used as a tool to enable Defendant Diddy and the Diddy Sexual Abuse  
9       and Cover Up Enterprise Participants to participate in a pattern of racketeering  
10      activity.

12      304.       Section 1964(c) provides that “[a]ny person injured in his business or  
13      property by reason of a violation of section 1962 of this chapter may sue therefore in  
14      any appropriate United States district court and shall recover threefold the damages  
15      he sustains and the cost of suit, including a reasonable attorney’s fee.” 18 U.S.C. §  
16      1964.

18      305.       The Diddy Sexual Abuse and Cover Up Enterprise falls within the meaning  
19      of 18 U.S.C. § 1961(4) and consists of a group of “persons” associated together for  
20      the common purpose of: (i) endorsing and facilitating Diddy’s sexual harassment,  
21      assault and abuse of others, including Plaintiff, (ii) threatening and misleading  
22      Defendant Diddy’s victims to prevent the reporting, disclosure, or prosecution of his  
23      sexual acts, and (iii) intervening in Plaintiff’s efforts to report by concealing and  
24      refusing to report Defendant Diddy’s sexual offenses to the appropriate authorities,  
25      including law enforcement.

1       306. Defendants have conducted and participated in the affairs of the Diddy  
2       Sexual Abuse and Cover Up Enterprise through a pattern of racketeering activity  
3       within the meaning of 18 U.S.C. §§ 1961(1) and 1961(5), which includes multiple  
4       instances of obtaining a victim for the purpose of committing or attempting to  
5       commit aggravated sexual abuse in violation of 18 U.S.C. §§ 1590 as described  
6       above, facilitating and financially benefitting from forced labor and sex trafficking  
7       in violation of 18 U.S.C. §§ 1589 (a), 1595(a), and instances of transporting  
8       individuals, specifically Plaintiffs in the instant case, for the purposes of furthering  
9       the common purposes of the Diddy Sexual Abuse and Cover Up Enterprise,  
10       including sexual abuse, sexually illicit photography/videography, and other immoral  
11       purposes in violation of 18 U.S.C. § 2421, also known as the Mann Act.

12       307. The Diddy Sexual Abuse and Cover Up Enterprise engaged in and affected  
13       interstate commerce, where Defendants utilized phone lines to make arrangements  
14       for Defendant Diddy to further his illicit sexual activities.

15       308. Each participant in the Diddy Sexual Abuse and Cover Up Enterprise had a  
16       systemic linkage to each other participant through personal relationships and  
17       employment relationships and functioned as a continuing unit for the purpose of  
18       furthering the scheme and their common purposes.

19       309. Defendants, upon information and belief, also used the internet and other  
20       electronic facilities to carry out the scheme and conceal the ongoing sexual and  
21       fraudulent activities taking place within the Diddy Sexual Abuse and Cover Up  
22       Enterprise.

1        310.        The wire transmissions described herein were made in furtherance of  
2                Defendants' scheme and common purpose.

3        311.        Defendants' scheme and the above-described racketeering activities  
4                amounted to a common course of conduct intended to cause Plaintiffs and others to  
5                hide and conceal Defendant Diddy's abuse. Each such racketeering activity was  
6                related, had similar purposes, involved the same or similar participants and methods  
7                of commission, and had similar results affecting similar victims, including Plaintiffs.  
8                Defendants' fraudulent activities are part of their ongoing business and constitute a  
9                continuing threat to Plaintiffs.

10       312.       The pattern of racketeering activity alleged herein and the Diddy Sexual  
11               Abuse and Cover Up Enterprise are separate and distinct from each other.  
12               Defendants engaged in a pattern of racketeering activity alleged herein for the  
13               purpose of conducting the affairs of the Diddy Sexual Abuse and Cover Up  
14               Enterprise.

15       313.       Defendant Diddy and the Diddy Sexual Abuse and Cover Up Enterprise  
16               created and perpetuated a toxic culture that allowed Defendant Diddy's abuse to  
17               flourish.

18       314.       Defendant Diddy had extensive power and influence on others due to his  
19               prominent status as a mogul, his fame and notoriety.

20       315.       Defendant Diddy had command. Defendant Diddy had means, access and  
21               influence to provide individuals with a career in the entertainment industry, and  
22               23               24               25               26               27               28

1 other industries, through his dominate stature in the entertainment industry and  
2 connections afforded him due to his fame and notoriety.

3 316. Defendant Diddy had authority. Defendant Diddy at all times was a mogul  
4 and billionaire who cultivated relationships with some of the most influential  
5 individuals through his highly sought after parties and notoriety in the music  
6 industry.  
7

8 317. Defendant Diddy had control. Defendant Diddy controlled who did what,  
9 when and how within his circle of friends and employees including Defendants  
10 named herein. If Defendants failed to comply with covering up Defendant Diddy's  
11 sexual abuse and assaults they would be terminated, blackballed or find themselves  
12 in legal trouble.  
13

14 318. Defendant Diddy had power. Plaintiff Parham attempted to report that it was  
15 in fact Defendant Diddy who had assaulted her but instead was met with disregard  
16 by the Contra Costa Sheriff's Department. Plaintiff Does attempted to report their  
17 kidnapping, assault and Plaintiff Parham's assault was thwarted when Defendant  
18 Pelletier intervened with the responding officer.  
19

20 319. Defendant Diddy and the Diddy Sexual Abuse and Cover Up Enterprise were  
21 designed to manipulate, control, sexually assault and prevent individuals from  
22 coming forward.  
23

24 320. Defendants knowingly benefited from the Diddy Sexual Abuse and Cover Up  
25 Enterprise as they retained employment benefits and other monetary benefits.  
26 Specifically, Defendant Shane mysteriously had a brand-new car, upon information  
27  
28

1 and belief, provided to him by Defendant Diddy in thanks and appreciation of  
2 facilitating the sexual assault on Plaintiff. Defendants Pelletier, Valdez, Jaguar and  
3 Helena received and handled cash on behalf of the enterprise. Defendants Odell and  
4 Druski received benefits related to their celebrity specifically Defendant Druski who  
5 had a television show on the Revolt TV network.<sup>3</sup>  
6

7 321. Defendants willfully ignored the dangers of Defendant Diddy's conduct and  
8 pattern of harassment, sexual assault, abuse and misconduct solely for their own  
9 personal economic benefit.  
10

11 322. Plaintiffs reports to police were ignored. Others who complained about  
12 Defendant Diddy's egregious behavior were ignored until Cassie Ventura sued  
13 Defendant Diddy.  
14

15 323. Since Ms. Ventura's bravery, countless individuals have come forward and  
16 filed complaints regarding sexual abuse at the hands of Defendant Diddy. The  
17 chorus of victims and evidence obtained by the U.S. Attorney's Office for the  
18 Southern District of New York ultimately led to Defendant Diddy being indicted for  
19 RICO violations and sex trafficking, among other charges.  
20

21 324. The Diddy Sexual Abuse and Cover Up Enterprise and its members protected  
22 Defendant Diddy, therefore allowing Defendant Diddy to continue with sordid and  
23 egregious sexual abuse practices, intimidated witnesses and victims from reporting  
24 Defendant Diddy's crimes and interfered with investigations concerning his abuse.  
25  
26  
27

28 <sup>3</sup> *Sneakin' in with Druski*, announced by Defendant Diddy in 2021.

1 Most notably, a video showing Defendant Diddy abusing Ms. Ventura was covered  
2 up and sold to him.

3  
4 325. In the instant case Defendant Diddy was aided and abetted by his network of  
5 employees including Defendants who helped him escape and evade capture by  
6 police after Plaintiffs harrowing escape.

7  
8 326. Defendants were members of the Diddy Sexual Abuse and Cover Up  
9 Enterprise and facilitated, benefited from, had knowledge of or should have known  
10 of Defendant Diddy's sexual proclivities and predatory sexual behavior.

11  
12 327. Defendants assisted in Defendant Diddy's predatory sexual behavior and  
13 proclivities by setting up Plaintiff to be sexually assaulted and raped by Defendant  
14 Diddy as well as assisting in covering up the crime thereafter.

15  
16 328. Defendants provided Defendant Diddy the means to effectuate his crimes,  
17 including carrying the drugs used to disable Plaintiffs as well as the means to  
18 escape.

19  
20 329. Plaintiffs have been injured in their person by reason of these RICO  
21 violations.

22  
23 330. By reason of and as a result of Defendants' conduct in furtherance of the  
24 Diddy Abuse Enterprise and resulting RICO violations, Plaintiffs have been injured  
25 in their person. As detailed above, Plaintiffs have suffered direct and severe damage  
26 to their professional and personal wellbeing as a result of the assault and harassment  
27 perpetuated by and allowed by Defendants.  
28

1       331. Defendant Diddy's assault and Defendants' RICO violations have caused  
2       Plaintiffs to suffer from severe emotional distress including developing an eating  
3       disorder and extreme weight loss causing several hospitalizations as well as  
4       extensive need for therapy.

5  
6       332. As a result of Defendants' actions Plaintiffs have continued to experience  
7       fear and anxiety and also sought professional help on numerous occasions since the  
8       egregious assault including several hospitalizations, visits to her personal physician  
9       and therapists.

10  
11       333. Specifically, Plaintiffs Does have had to move continuously and have even  
12       petitioned for name changes to protect their identities from being discovered by the  
13       Diddy Abuse Enterprise.

14  
15       334. Defendant Diddy's rape, kidnapping and assault and Defendants' RICO  
16       violations have caused Plaintiffs to be fearful, distressed, anxious, degraded, and  
17       depressed. Plaintiffs have gained a global distrust for individuals.

18  
19       335. If not but for Defendant Diddy's direct action and the atmosphere cultivated  
20       by him and the Defendants who were members of the Diddy Sexual Abuse and  
21       Cover Up Enterprise, Plaintiffs would not have developed several issues that have  
22       severely impacted their lives and livelihood. Plaintiffs' issues and overall health has  
23       been exacerbated by the ongoing trauma of not being believed. The damage to  
24       Plaintiffs persons is incalculable.

25  
26       336. Plaintiff Parham has experienced years of anxiety and depression since the  
27       violent rape and assault that occurred in 2018. Her anxiety and depression was  
28

1 compounded by the lack of care and complete disregard of her reports to law  
2 enforcement. Even when Plaintiff was brave enough to name Defendant Diddy to  
3 the police when called immediately after the incident she was dismissed and treated  
4 as if she was lying due to the fame and overall public support of Defendant Diddy at  
5 the time, which speaks to the wide-spread influence Defendant Diddy had over the  
6 general public at large.  
7

8  
9 337. Plaintiff Parham has struggled with her inability to reconcile her horrible  
10 experience with Defendant Diddy and other members of the Diddy Abuse Enterprise  
11 and their outward failure to protect women, as members included women.

12 338. Plaintiffs Does live in constant fear and have went through great lengths to  
13 protect their lives and identities from discovery of the Diddy Abuse Enterprise.  
14 Plaintiffs come forward now because they believe it is safe to do so due to  
15 Defendant Diddy's incarceration, charges and upcoming trial as well as in support  
16 of Plaintiff Parham.  
17

18 339. At all relevant times, all Defendants were aware of the essential nature and  
19 scope of the Diddy Sexual Abuse and Cover Up Enterprise and intended to  
20 participate in it.  
21

22  
23 **SECOND CAUSE OF ACTION**  
24 **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT**  
25 **ORGANIZATIONS ACT (RICO) — CONSPIRACY 18 U.S.C. 1962(d)**  
26 *(Plaintiffs Against All Defendants)*  
27  
28

1       340.       Plaintiffs incorporate by reference and reallege each of the preceding  
2               paragraphs and all paragraphs below as though fully set forth and brought in this  
3               cause of action.

4  
5       341.       Each Defendant agreed to commit the substantive racketeering offense  
6               through agreeing to participate in racketeering acts.

7       342.       Each enterprise member agreed to commit the substantive racketeering  
8               offense through agreeing to participate in racketeering acts.

9  
10      343.       Each Defendant knew the general status of the conspiracy was to enable and  
11              cover up Defendant Diddy's decades worth of sexual abuses.

12      344.       Each enterprise member knew the general status of the conspiracy was to  
13              enable and cover up Defendant Diddy's decades worth of sexual abuses.

14  
15      345.       Each Defendant knew the conspiracy extended beyond their individual role.

16      346.       Each enterprise member knew the conspiracy extended beyond their  
17              individual role.

18      347.       As set forth above, each Defendant agreed and conspired to violate 18 U.S.C.  
19              § 1962(c).

20  
21      348.       Specifically, in an effort to enable, further, protect, aid, secrete, and cover up  
22              each of Defendant Diddy's sexual assaults, Defendant Diddy's pattern and practice  
23              of sexual assault, kidnapping and abuse, and Defendant Diddy's sexual battery  
24              against Plaintiffs, Defendants agreed to engage in each of the predicate offenses  
25              identified above.  
26  
27  
28

1        349.        Defendants knew their predicate acts were part of a pattern of racketeering  
 2                activity and agreed to the commission of those acts to further the schemes described  
 3                above constituting a conspiracy to violate 18 U.S.C. § 1962(c), in violation of 18  
 4                U.S.C. § 1962(d).

6                                **THIRD CAUSE OF ACTION**  
 7                                **CIVIL CODE § 1708.5 – SEXUAL BATTERY**  
 8                                *(Plaintiffs Against Defendants Diddy, Shane, Odell, Druski, Valdez)*

9        350.        Plaintiff incorporates by reference and realleges each of the preceding  
 10                paragraphs and all paragraphs below as though fully set forth and brought in this  
 11                cause of action.

12        351.        Defendants committed acts with the intent to cause a harmful or offensive  
 13                contact with an intimate part of Plaintiff. The sexually offensive and unwanted  
 14                contact with Plaintiff directly resulted from Defendants' said acts.

15        352.        Defendant Diddy exploited his position of authority to intimidate,  
 16                overwhelm, and subdue Plaintiff's, with the assistance of Defendants Shane, KK,  
 17                Odell, Brandi and Druski, objections to his conduct would be met with retaliation.

18        353.        Defendant Diddy abused his position of power and authority over Plaintiff  
 19                Parham, who was in no position to reject his sexual assault due to her being  
 20                physically outnumbered, unable to vacate the premises because she was drugged  
 21                and having her clothes, purse, cell phone and keys hidden from her.

22        354.        Defendant Diddy abused his position of power and authority over Plaintiff  
 23                John Doe, who was in no position to reject his sexual assault due to him being  
 24                John Doe, who was in no position to reject his sexual assault due to him being  
 25                John Doe, who was in no position to reject his sexual assault due to him being  
 26                John Doe, who was in no position to reject his sexual assault due to him being  
 27                John Doe, who was in no position to reject his sexual assault due to him being  
 28                John Doe, who was in no position to reject his sexual assault due to him being

1 physically outnumbered, unable to vacate the premises because he was drugged and  
2 kidnapped and having his cell phone and keys hidden from him.

3  
4 355. Defendant Valdez abused his position of power and authority over Plaintiff  
5 Jane Doe, who was in no position to reject his sexual assault due to her being  
6 physically outnumbered, unable to vacate the premises because she was drugged  
7 and kidnapped and having her cell phone and keys hidden from her.

8  
9 356. Defendants Diddy, Shane, Odell and Druski's battery on Plaintiff caused  
10 physical injury, severe mental and emotional distress, pain and suffering, mental  
11 anguish, and loss of enjoyment of life.

12 357. Defendants' unlawful actions were intentional, done with malice, and/or  
13 showed a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights.

14  
15 358. Plaintiff claims compensatory and punitive damages herein.

16 359. The amount of damages sought herein exceeds the jurisdictional limits of all  
17 other Courts which would otherwise have jurisdiction.

18  
19 **FOURTH CAUSE OF ACTION**  
20 **CALIFORNIA CIVIL CODE § 340.16 – SEXUAL ASSAULT**  
21 *(Plaintiff Parham Against Defendants Diddy, Shane, Odell, Druski)*

22 360. Plaintiff incorporates by reference and realleges each of the preceding  
23 paragraphs and all paragraphs below as though fully set forth and brought in this  
24 cause of action.

25 361. Defendants touched an intimate part of Plaintiff, against her will, for sexual  
26 arousal, sexual gratification, or sexual abuse.  
27  
28

1 362. Defendants committed an act of sexual penetration against Plaintiff's will by  
2 means of force, drugging, violence, duress, menace, or fear of immediate and  
3 unlawful bodily injury to Plaintiff.

4  
5 363. Defendants' conduct placed Plaintiff in reasonable apprehension of bodily  
6 harm.

7 364. Defendants' actions caused Plaintiff to fear retaliation in the future and there  
8 was a reasonable possibility that Defendants, specifically Defendant Diddy, could  
9 execute on a threat of retaliation.

10  
11 365. Defendants' assault on Plaintiff caused physical injury, severe mental and  
12 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

13 366. Defendants' unlawful actions were intentional, done with malice, and/or with  
14 a deliberate, willful, wanton, and reckless indifference to Plaintiff's rights.

15  
16 367. Defendants conspired to and did engage in a cover up or attempted a cover  
17 up of previous instances or allegations of sexual assault by Defendant Diddy.

18 368. Newly enacted CCP 340.16, effective January 1, 2023, is the governing  
19 California State Statute extending the statute of limitations and granting revival of a  
20 Plaintiff's claims seeking to recover damages suffered as a result of a sexual assault  
21 that occurred on Plaintiff.

22  
23 369. The amount of damages sought herein exceeds the jurisdictional limits of all  
24 other Courts which would otherwise have jurisdiction.

25  
26  
27 **FIFTH CAUSE OF ACTION**  
28 **CALIFORNIA CIVIL CODE § 51.9 – SEXUAL HARASSMENT**  
*(Plaintiff Parham Against Defendants Diddy, Shane, Odell, Druski)*

1  
2 370. Plaintiff incorporate by reference and reallege each of the preceding  
3 paragraphs and all paragraphs below as though fully set forth and brought in this  
4 cause of action.

5 371. Defendants made sexual advances, solicitations, sexual requests, demands for  
6 sexual compliance by Plaintiff, as well as engaged in other verbal, visual, or  
7 physical conduct of a sexual nature or of a hostile nature based on Plaintiff's gender,  
8 all of which were unwelcome and pervasive or severe.

9  
10 372. Defendants intentionally, recklessly, and wantonly acts resulted in harmful  
11 and offensive contact with the intimate parts of Plaintiff's persons.

12  
13 373. Defendant Diddy, specifically, used his authority to coerce and exploit  
14 Defendant Shane into luring Plaintiff to his home so that Defendant Diddy could  
15 physically, psychologically, and/or emotionally through force, manipulation,  
16 emotional abuse, intimidation, and retaliation abuse Plaintiff. These acts were done  
17 for Defendant Diddy's sexual gratification.

18  
19 374. Plaintiff has suffered economic loss or disadvantage and/or personal injury,  
20 including but not limited to, emotional distress as a result of Defendants conduct.

21 375. As a result of Defendants unlawful conduct, Plaintiff is entitled to actual  
22 damages and exemplary damages pursuant to California Civil Code section 52,  
23 subdivision (b), in an amount to be awarded at trial.

24  
25 **SIXTH CAUSE OF ACTION**  
26 **BATTERY**  
27 *(Plaintiffs Against All Defendants)*  
28

1       376.       Plaintiffs incorporates by reference and realleges each of the preceding  
2       paragraphs and all paragraphs below as though fully set forth and brought in this  
3       cause of action.

4  
5       377.       Defendants intended to commit and committed acts of unwanted contact with  
6       Plaintiffs.

7       378.       Defendants Diddy, Shane, Odell and Druski committed unwanted contact  
8       with Plaintiff Parham in a harmful and offensive manner, including but not limited  
9       to by inflicting sexual abuse against Plaintiff.

10  
11       379.       Among other batteries, Defendants KK and Brandi abused Plaintiff Parham  
12       without her consent and without equality.

13       380.       Defendants Pelletier, Gonzalez, Valdez, Helena and Jaguar committed  
14       unwanted contact with Plaintiffs Does in a harmful and offensive manner, including  
15       but not limited to by inflicting severe physical abuse against Plaintiffs.

16  
17       381.       Defendants Diddy, committed unwanted contact with Plaintiff John Doe in a  
18       harmful and offensive manner, including but not limited to by inflicting sexual  
19       abuse against Plaintiff.

20  
21       382.       Defendant Diddy exploited his position and status to intimidate, overwhelm,  
22       and subdue Plaintiffs. Any objections to his conduct would be met with retaliation  
23       not only by Plaintiffs but the other Defendants involved.

24  
25       383.       Defendant Diddy abused his position of power and influence over Plaintiff  
26       Parham and John Doe, who were in no position to reject his sexual advances.

1 384. Defendants' batteries on Plaintiffs caused physical injury, severe mental and  
2 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

3 385. Defendants' unlawful actions were intentional, done with malice, and/or  
4 showed a deliberate, willful, wanton, and reckless indifference to Plaintiffs' rights.  
5

6 386. Plaintiffs claim compensatory and punitive damages herein.

7 387. The amount of damages sought herein exceeds the jurisdictional limits of all  
8 other Courts which would otherwise have jurisdiction.  
9

10 **SEVENTH CAUSE OF ACTION**  
11 **ASSAULT**  
12 *(Plaintiffs Against All Defendants)*

13 388. Plaintiffs incorporates by reference and realleges each of the preceding  
14 paragraphs and all paragraphs below as though fully set forth and brought in this  
15 cause of action.

16 389. Defendants intentionally attempted, threatened, and committed harmful and  
17 offensive contacts against Plaintiffs, including but not limited to inflicting sexual  
18 abuse and physical abuse against Plaintiffs.  
19

20 390. Defendants' conduct placed Plaintiffs in reasonable apprehension of bodily  
21 harm.  
22

23 391. Defendants' assaults on Plaintiffs caused physical injury, severe mental and  
24 emotional distress, pain and suffering, mental anguish, and loss of enjoyment of life.

25 392. Defendants' unlawful actions were intentional, done with malice, and/or  
26 showed a deliberate, willful, wanton, and reckless indifference to Plaintiffs' rights.  
27

28 393. Plaintiffs' claims compensatory and punitive damages herein.

1 394. The amount of damages sought herein exceeds the jurisdictional limits of all  
2 other Courts which would otherwise have jurisdiction.

3  
4 **EIGHTH CAUSE OF ACTION**  
5 **NEGLIGENCE**

6 *(Plaintiff Parham Against Defendant Shane)*

7 395. Plaintiff incorporate by reference and reallege each of the preceding and all  
8 paragraphs below as though fully set forth and brought in this cause of action.

9 396. Defendant Shane invited Plaintiff to his home as a guest. Defendant Shane  
10 owed Plaintiff a right to expect protection from the other Defendants, specifically  
11 Defendant Diddy, while a guest in his home.

12 397. As a direct and proximate result of the foregoing negligence, Plaintiff was  
13 sexually harassed, assaulted and abused by Defendants Diddy, Shane and Does 1  
14 and 2, causing Plaintiff bodily injuries, pain and suffering, mental anguish, and loss  
15 of capacity for the enjoyment of life. The losses are either permanent or continuing,  
16 and Plaintiff will suffer losses in the future.

17  
18 **NINTH CAUSE OF ACTION**  
19 **NEGLIGENT FAILURE TO WARN**

20 *(Plaintiffs Against Defendants Shane, KK, Pelletier, Gonzalez, Valdez, Odell, Druski,*  
21 *Jaguar, Helena, Brandi, Does)*

22 398. Plaintiffs incorporate by reference and reallege each of the preceding and all  
23 paragraphs below as though fully set forth and brought in this cause of action.

24 399. Defendants conduct created a risk of physical or emotional harm to Plaintiffs.

25 400. Defendants knew and had reason to know that Plaintiffs Parham and John  
26 Doe were at risk of sexual assault and abuse by Defendant Diddy.  
27  
28

1       401.       Despite the knowledge of the danger in the participation in the Diddy Sexual  
2       Abuse and Cover Up Enterprise, Defendants did not alert Plaintiffs to the risk of  
3       sexual assault, harassment, kidnapping, physical assault, rape, and/or other attacks  
4       by Defendant Diddy. In fact, Defendants facilitated and assisted Defendant Diddy in  
5       his illegal deviant activities and despicable behavior.  
6

7       402.       Defendant Pelletier represented he was lawfully transporting Plaintiffs Does  
8       for the purpose of outstanding warrants.  
9

10       403.       Defendant Shane, specifically represented to Plaintiff that she would be safe  
11       while a guest in his home and would be free of risk of attack.

12       404.       Defendants had reason to know that Plaintiffs would be unaware of the risk  
13       of sexual assault, harassment, kidnapping, physical assault, rape, and/or other  
14       attacks by Defendant Diddy and the Diddy Sexual Abuse and Cover Up Enterprise.  
15

16       405.       A warning to Plaintiffs by any Defendant that they were at risk of sexual  
17       assault, harassment, kidnapping, physical assault, rape, and/or other attacks by  
18       Defendant Diddy or any other Defendant would have reduced the risk of harm to  
19       Plaintiffs.  
20

21       406.       As a legal and direct result of the aforementioned conduct and omission of  
22       Defendants, Plaintiffs were sexually assaulted, harassed, kidnapped, physically  
23       assaulted, raped, and/or otherwise attacked and robbed of their dignity and personal  
24       safety. The depraved attacks on Plaintiff caused Plaintiff to suffer serious  
25       psychological and physical harm from which she may never fully recover.  
26  
27  
28

1       407.       As a direct and legal result of Defendants' Failure to Warn, Plaintiffs  
2       suffered damages, both economic and general, non-economic damages according to  
3       proof.  
4

5                   **TENTH CAUSE OF ACTION**  
6                   **NEGLIGENT SUPERVISION AND RETENTION**  
7                   *(Plaintiffs Against Defendant Diddy)*

8       408.       Plaintiffs incorporate by reference and reallege each of the preceding  
9       paragraphs and all paragraphs below as though fully set forth and brought in this  
10       cause of action.

11       409.       At all times material, Defendants were employed by Defendant Diddy (under  
12       the control and authority of Defendant Diddy).

13       410.       Defendants were unfit or incompetent and posed a particular risk of sexually  
14       harassing, assaulting, and or mentally abusing Plaintiff.

15       411.       Defendant Diddy knew or should have known not only that Defendants were  
16       unfit or incompetent and posed a particular risk of sexually harassing, assaulting,  
17       physically and or mentally abusing Plaintiffs, but also that this unfitness created a  
18       particular risk to Plaintiffs.  
19

20       412.       Defendants' unfitness and particular risk to Plaintiffs harmed Plaintiffs.

21       413.       Defendant Diddy knew or should have known that Defendants Odell and  
22       Druski had previously engaged and was continuing to engage in unlawful sexual  
23       conduct for his own personal sexual gratification.  
24

25       414.       Defendant Diddy knew or should have known that it was foreseeable that  
26       Defendants Odell and Druski was engaging, or would engage, in illicit sexual  
27  
28

1 activities with Plaintiff under the cloak of the authority, confidence, and trust,  
2 bestowed upon him through Defendant Diddy.

3 415. At no time during the alleged period did Defendant Diddy have in place a  
4 reasonable system or procedure to investigate, supervise and monitor Defendants  
5 Odell and Druski to prevent sexual and verbal abuse, sexual assault, nor did he  
6 implement a system or procedure to oversee or monitor conduct towards individuals  
7 they encountered.  
8

9 416. Defendant Diddy conspired to and did breach his duties of care owed to  
10 Plaintiff, including by turning a blind eye and encouraging known abuses by  
11 Defendants Odell and Druski and the known dangerous conditions of the Diddy  
12 Sexual Enterprise and by continuing to expose individuals, like Plaintiffs Parham  
13 and John Doe, to these dangers for decades.  
14

15 417. Even though Defendant Diddy knew or should have known of these sexually  
16 illicit activities by himself and Defendants Odell and Druski, he failed to use  
17 reasonable care in supervising Defendants Odell and Druski and did nothing to  
18 reasonably investigate, supervise or monitor Defendants Odell and Druski to ensure  
19 the safety of individuals they encountered.  
20

21 418. Defendant Diddy's negligence in supervising and or retaining Defendants  
22 Odell and Druski was a substantial factor in causing harm to Plaintiff.  
23

24 419. As a result of the above-described conduct, Plaintiffs has expended  
25 significant costs on therapy and suffered damages including deprivation of income  
26 and benefits, loss of employment opportunities, severe physical and emotional  
27  
28

1       distress, pain and suffering, mental anguish, humiliation, loss of enjoyment of life,  
2       and damage to her reputation and career.

3       420.       Plaintiffs claim compensatory and punitive damages herein.

4  
5       421.       The amount of damages sought herein exceeds the jurisdictional limits of all  
6       other Courts which would otherwise have jurisdiction.

7                                   **ELEVENTH CAUSE OF ACTION**  
8                                   **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
9                                   *(Plaintiffs Against All Defendants)*

10       422.       Plaintiffs incorporate by reference and reallege each of the preceding  
11       paragraphs and all paragraphs below as though fully set forth and brought in this  
12       cause of action.

13       423.       Defendants conspired to and did engage in conduct that was extreme and  
14       outrageous and intentionally caused severe emotional distress to Plaintiffs.

15  
16       424.       Defendants' conduct exceeded all possible bounds of decency.

17       425.       Defendants acted with the intent and knowledge that Plaintiffs suffered  
18       emotional distress due to their inexcusable and outrageous conduct.

19  
20       426.       Defendants' conduct caused Plaintiffs to suffer physical injury, severe mental  
21       and emotional distress, pain and suffering, mental anguish, and loss of enjoyment of  
22       life.

23       427.       Defendants' unlawful actions were intentional, done with malice, and/or  
24       showed a deliberate, willful, wanton, and reckless indifference to Plaintiffs' rights.

25  
26       428.       Plaintiffs' claims compensatory and punitive damages herein.



1 435. Defendant Shane received significant revenue, specifically a new car, for his  
2 betrayal and his involvement in Plaintiff's assault, battery, rape, false imprisonment  
3 and his role in the Diddy Sexual Abuse and Cover Up Enterprise.  
4

5 436. Defendants Pelletier, Valdez, KK, Brandi, Helena, Jaguar and Does received  
6 revenue in the form of cash payment for their involvement in in Plaintiffs Does  
7 assault, battery, false imprisonment and his role in the Diddy Sexual Abuse and  
8 Cover Up Enterprise.  
9

10 437. Other Defendants named herein received significant revenue for their  
11 involvement in Plaintiffs assault and their roles in the Diddy Sexual Abuse and  
12 Cover Up Enterprise.  
13

14 438. Defendants appreciate and have knowledge of such benefits and retain them  
15 to this day.

16 439. Under principles of equity and good conscience, Defendants should not be  
17 permitted to retain the profit they received and retained at Plaintiffs expense while  
18 refusing to provide compensation for the injuries suffered by Plaintiffs as a result of  
19 their unlawful conduct, including their failure to guard against, educate as to, or  
20 otherwise failure to prevent such injuries inflicted on Plaintiffs.  
21

22 440. Under principles of equity and good conscience, Defendants should not be  
23 permitted to retain the profit they received and retained at Plaintiffs expense while  
24 refusing to provide compensation for the injuries suffered by Plaintiffs as a result of  
25 their unlawful conduct as members of the Diddy Sexual Abuse and Cover Up  
26 Enterprise.  
27  
28

1        441.        Plaintiffs seek restitution and/or disgorgement of all monies Defendants have  
2                    unjustly received and retained as a result of their unlawful conduct and participation  
3                    in the Diddy Sexual Abuse and Cover Up Enterprise alleged herein.  
4

5                    **FOURTEENTH CAUSE OF ACTION**  
6                    **AIDING AND ABETTING**  
7                    *(Plaintiffs Against All Defendants)*

8        442.        Plaintiffs incorporate by reference and reallege each of the preceding  
9                    paragraphs and all paragraphs below as though fully set forth and brought in this  
10                  cause of action.

11       443.       Defendants knew that an assault/battery/sexual assault was being committed  
12                  and was going to be committed against Plaintiffs because of Defendants  
13                  involvement in the Diddy Sexual Abuse and Cover Up Enterprise.  
14

15       444.       Defendants provided drugs to be used to take advantage of Plaintiffs without  
16                  the knowledge or consent of Plaintiffs.

17       445.       Defendants knew Plaintiffs have been and would be assaulted because of  
18                  their involvement in the Diddy Sexual Abuse and Cover Up Enterprise.  
19

20       446.       Defendants' conduct was a substantial factor in causing harm to Plaintiffs.

21       447.       Through the aforementioned acts, Defendants caused Plaintiffs an imminent  
22                  apprehension of harmful or offensive contact with an intimate part of Plaintiffs'  
23                  body and sexually offensive contact with Plaintiffs resulted.  
24

25       448.       As a result of Defendants conduct, Plaintiffs have suffered economic injury.  
26                  Plaintiffs' general, special, and consequential damages are in an amount to be  
27  
28

1 proven at trial, but in no event is less than the minimum jurisdictional amount of this  
2 Court.

3 449. As a result of Defendants above-described conduct, Plaintiffs have suffered  
4 and continues to suffer great emotional distress and was prevented and will continue  
5 to be prevented from performing daily activities and obtaining the full enjoyment of  
6 life.  
7

8 450. As described in this Complaint, the Defendants conduct was done with  
9 oppression, fraud, and/or malice warranting significant damages, including punitive  
10 damages.  
11

12 451. Here, Plaintiffs were sexually assaulted by Defendants Diddy, Shane, Odell,  
13 Druski, Valdez and Doe at Defendant Shane's residence. Plaintiff was legally on the  
14 premises as a guest and invitee of Defendant Shane. Defendant Shane (through  
15 renting) the premises had dominion and control over the premises where Plaintiff  
16 was harmed. Defendant Diddy had dominion and control over the actions of  
17 Defendants Shane, Odell, Druski and Doe and failed to step in and stop them from  
18 sexually assaulting Plaintiff Parham.  
19  
20

21 452. As the owner of the property, Defendant Shane had a duty to protect Plaintiff  
22 from the harm she suffered at the hands of Defendants Diddy Odell, Druski and Doe  
23 and breached his duty when he failed to stop them from sexually assaulting Plaintiff  
24 Parham. In furtherance of this breach, Defendant Shane encouraged Defendant  
25 Diddy Odell, Druski and Doe to continue their assault on Plaintiff. Plaintiff has  
26  
27  
28

1 suffered immensely because of Defendant Shane's intentional breach of his duty to  
2 her.

3  
4 453. Plaintiffs Does were battered, sexually assaulted and assaulted by Defendants  
5 Diddy, Pelletier, Gonzalez and Valdez at Defendant Shane's residence. Plaintiffs  
6 were legally on the premises as they were kidnapped and forcefully brought there.  
7 Defendant Shane (through renting) the premises had dominion and control over the  
8 premises where Plaintiffs were harmed. Defendant Diddy had dominion and control  
9 over the actions of Defendants Shane, Odell, Druski, Pelletier, Gonzalez, Valdez  
10 and Doe and failed to step in and stop them from assaulting and battering Plaintiffs.  
11

12 454. As the owner of the property, Defendant Shane had a duty to protect  
13 Plaintiffs from the harm they suffered at the hands of Defendants Diddy, Pelletier,  
14 Gonzalez, and Valdez and breached his duty when he failed to stop them from  
15 battering and assaulting Plaintiffs Does. In furtherance of this breach, Defendant  
16 Shane encouraged Defendants to continue their assault on Plaintiffs. Plaintiffs have  
17 suffered immensely because of Defendant Shane's intentional breach of his duty to  
18 them.  
19  
20

21 455. As a result of breach of his duty, Plaintiffs have suffered and continues to  
22 suffer harm, including severe emotional distress, anxiety, and other consequential  
23 damages, for which they are entitled to an award of monetary damages and other  
24 relief.  
25

26 456. Defendants conduct described above was willful, wanton, and malicious. At  
27 all relevant times, Defendants acted with conscious disregard for Plaintiffs' rights  
28

1 and feelings, acted with the knowledge of or with reckless disregard for the fact that  
2 their conduct was certain to cause injury to Plaintiffs, and intended to cause fear,  
3 physical injury and/or pain and suffering to Plaintiffs. By virtue of the foregoing,  
4 Plaintiffs are entitled to recover punitive damages.  
5

6 **FIFTEENTH CAUSE OF ACTION**  
7 **TRAFFICKING AND VICTIMS' PROTECTION ACT**  
8 *(Plaintiffs Against All Defendants)*

9 457. Plaintiffs incorporate by reference and reallege each of the preceding  
10 paragraphs and all paragraphs below as though fully set forth and brought in this  
11 cause of action.

12 458. Defendants knowingly and intentionally participated in, perpetrated, assisted,  
13 supported, and facilitated a sex trafficking venture that was in and affecting  
14 interstate and foreign commerce, together and with others, in violation of 18 U.S.C.  
15 § 1590  
16

17 459. Among other things, Defendants knowingly and intentionally recruited,  
18 enticed, provided, obtained, advertised, and solicited by various means Plaintiffs,  
19 knowing that Defendants would use means of force, threats of force, fraud,  
20 coercion, and a combination of such means to cause Plaintiffs to engage in  
21 nonconsensual sex acts.  
22

23 460. Defendants had actual knowledge that they were perpetrating and facilitating  
24 Defendant Diddy's sexual abuse and sex trafficking conspiracy to recruit, solicit,  
25 entice, coerce, harbor, transport, obtain, and provide Plaintiffs into nonconsensual  
26  
27  
28

1 sex acts, through the means of force, threats of force, fraud, abuse of process, and  
2 coercion.

3 461. Despite such knowledge, Defendants intentionally paid for, facilitated,  
4 perpetrated, and participated in Defendant Diddy's violations of 18 U.S.C. § 1590,  
5 which Defendants knew, and were in reckless disregard of the fact that Defendant  
6 Diddy would coerce, defraud, and force Plaintiffs to engage in nonconsensual sex  
7 acts.  
8

9  
10 462. Defendants' actions were in and affecting interstate and foreign commerce.

11 463. By taking the concrete steps alleged in this Complaint, Defendants  
12 knowingly participated in sex trafficking and furthered the Diddy Sexual Abuse and  
13 Cover Up Enterprise. The concrete steps constituted taking part in the sex  
14 trafficking venture and were necessary for its success. The concrete steps  
15 constituted active engagement by Defendants in the Diddy Sexual Abuse and Cover  
16 Up Enterprise. Defendants knew that its active engagement would lead to and cause  
17 coercive sex trafficking.  
18

19  
20 464. Defendants affirmative conduct was committed knowing, and in reckless  
21 disregard of the facts, that Defendant Diddy would use his means and influence to  
22 force and intimidate Plaintiff into engaging in nonconsensual sex acts. Defendants'  
23 conduct was outrageous and intentional.

24  
25 465. Defendants knowing and intentional conduct has caused Plaintiffs serious  
26 harm, including, without limitation, physical, psychological, emotional, financial,  
27 and reputational harm.  
28

1       466. Defendants knowing and intentional conduct has caused Plaintiffs harm that  
2       are sufficiently serious, under all the surrounding circumstances, to compel a  
3       reasonable person of the same background and in the same circumstances to  
4       perform or to continue performing nonconsensual sexual activity, to avoid incurring  
5       further harm.  
6

7       467. Defendants criminal conduct in perpetrating TVPA violations was  
8       outrageous and intentional because it was in deliberate furtherance of a widespread  
9       and dangerous criminal sex trafficking organization. Defendants criminal conduct  
10      also evinced a high degree of moral turpitude and demonstrated such wanton  
11      dishonesty as to imply a criminal indifference to civil obligations. Defendants  
12      criminal conduct was directed specifically at Plaintiffs, who was the victim of  
13      Defendant Diddy's sexual abuse and sex trafficking.  
14

15  
16      468. Defendants outrageous and intentional conduct in this case is part of a pattern  
17      and practice of profiting by undertaking illegal "high risk, high reward" actions.  
18

19      469. By virtue of these knowing and intentional violations of 18 U.S.C. §§ 1590  
20      and 1595, Defendants are liable to Plaintiffs for the damages they sustained, and  
21      reasonable attorneys' fees.

22      470. By virtue of these intentional and outrageous violations of 18 U.S.C. § 1590  
23      and 1595, Defendants are liable to Plaintiffs.  
24

25                                   **SIXTEENTH CAUSE OF ACTION**  
26      **AIDING, ABETTING, AND INDUCING A SEX-TRAFFICKING VENTURE IN**  
27      **VIOLATION OF THE TRAFFICKING VICTIMS' PROTECTION ACT, 18 U.S.C.**  
28                                   **§§ 1590 and 1595**  
                                  *(Plaintiffs Against All Defendants)*

1       471.       Plaintiffs incorporate by reference and reallege each of the preceding  
2       paragraphs and all paragraphs below as though fully set forth and brought in this  
3       cause of action.

4  
5       472.       Defendants directly committed and perpetrated violations of Chapter 77,  
6       Title 18, U.S. Code, including 18 U.S.C. § 1590 by aiding, abetting, and inducing  
7       the sex trafficking venture and the sex trafficking of Plaintiffs. Defendants  
8       themselves directly violated Chapter 77 by committing and perpetrating these  
9       violations.

10  
11       473.       Among other things, Defendants aided, abetted, and induced Defendant  
12       Diddy's sex trafficking venture and sex trafficking of Plaintiffs Parham and John  
13       Doe knowing that Defendant Diddy would use means of force, threats of force,  
14       fraud, coercion, and a combination of such means to cause Plaintiffs to engage in  
15       nonconsensual sex acts.

16  
17       474.       By aiding, abetting, and inducing Defendant Diddy's sex trafficking venture  
18       and sex trafficking of Plaintiffs Parham and John Doe, Defendants benefited, both  
19       financially and by receiving things of value, from participating in the Diddy Sexual  
20       Abuse and Cover Up Enterprise sex trafficking venture.

21  
22       475.       Defendants had actual knowledge that they were aiding, abetting, and  
23       inducing Defendant Diddy and his co-conspirators' sexual abuse and sex trafficking  
24       conspiracy to recruit, solicit, entice, coerce, harbor, transport, obtain, and provide  
25       Plaintiffs into nonconsensual sex acts, through the means of force, threats of force,  
26  
27  
28

1 fraud, abuse of process, and coercion. Defendants knew, and should have known,  
2 that Defendant Diddy had engaged in acts in violation of the TVPA.

3 476. Defendants knowing and intentional conduct of aiding, abetting, and  
4 inducing Defendant Diddy's violations have caused Plaintiffs serious harm  
5 including, without limitation, physical, psychological, emotional, financial, and  
6 reputational harm.  
7

8 477. Through their unchecked support Defendants aided, abetted, and induced  
9 Defendant Diddy's violations and caused Plaintiffs harm that is sufficiently serious,  
10 under all the surrounding circumstances, to compel a reasonable person of the same  
11 background and in the same circumstances to perform or to continue performing  
12 nonconsensual sexual activity, in order to avoid incurring additional harm.  
13

14 478. Defendants' criminal conduct in aiding, abetting, and inducing Defendant  
15 Diddy's violations of the TVPA was outrageous and intentional, because it was in  
16 deliberate furtherance of a widespread and dangerous Diddy Sexual Abuse and  
17 Cover Up Enterprise and criminal sex trafficking organization. Defendants' criminal  
18 conduct also evinced a high degree of moral turpitude and demonstrated such  
19 wanton dishonesty as to imply a criminal indifference to civil obligations.  
20 Defendants criminal conduct was directed specifically at Plaintiffs, who were the  
21 victims of Defendant Diddy's sexual abuse and Cover Up sex trafficking  
22 organization.  
23  
24  
25  
26  
27  
28

1 479. Defendants' outrageous and intentional conduct in this case is part of a  
2 pattern and practice of Defendants by profiting by undertaking illegal "high risk,  
3 high reward" partnerships.  
4

5 480. By virtue of these knowing and intentional violations of 18 U.S.C. § 1590  
6 and 1595, Defendants are liable to Plaintiffs for the damages they sustained and  
7 reasonable attorneys' fees.  
8

9 481. By virtue of these intentional and outrageous violations of 18 U.S.C. § 1590  
10 and 1595, Defendants are liable to Plaintiffs for punitive damages.

11 **SEVENTEENTH CAUSE OF ACTION**  
12 **KNOWING BENEFICIARY IN A SEX-TRAFFICKING VENTURE IN**  
13 **VIOLATION OF THE TRAFFICKING VICTIMS' PROTECTION ACT, 18 U.S.C.**  
14 **§§ 1590 and 1595**  
*(Plaintiffs Against All Defendants)*

15 482. Plaintiffs incorporate by reference and reallege each of the preceding  
16 paragraphs and all paragraphs below as though fully set forth and brought in this  
17 cause of action.

18 483. Upon information and belief, Defendants knowingly and intentionally  
19 benefitted, financially and by receiving things of value, from participating in,  
20 assisting, supporting, and facilitating an illegal coercive sex trafficking venture that  
21 was in and affecting interstate and foreign commerce, together and with others, in  
22 violation of 18 U.S.C. § 1590.  
23

24 484. Defendants took many concrete steps to aid and participate in Diddy's Sexual  
25 Abuse and Cover Up Enterprise sex trafficking venture. Among the concrete steps  
26 that Defendants took to aid Defendant Diddy was providing victims to Defendant  
27  
28

1 Diddy, like Plaintiffs, as well as security, getaway driver, a private location to  
2 engage in his debaucheries and drugs used to weaken Plaintiffs defenses making the  
3 sex trafficking venture possible.  
4

5 485. Upon information and belief, Defendants roles and actions provided were  
6 necessary for Defendant Diddy to force Plaintiffs to engage in nonconsensual sex  
7 acts.  
8

9 486. The financing to the Defendants in the Diddy Sexual Abuse and Cover Up  
10 Enterprise directly formed part of the commercial nature of the sex acts. Defendants  
11 thusly actively participated in the recruitment of victims of the venture.  
12

13 487. Defendants knew or should have known that they were feeding Defendant  
14 Diddy's sexual deviancy.  
15

16 488. Upon information and belief, Defendants received financial benefits from  
17 Defendant Diddy and his sex trafficking venture, most notably a new car for  
18 Defendant Shane and cash payments to Defendants KK, Brandi, Pelletier, Gonzalez,  
19 Valdez, Odell, Druski and Does.  
20

21 489. Defendants knew that it would gain far from routine financial benefits by  
22 participating in the Diddy Sexual Abuse and Cover Up Enterprise sex trafficking  
23 venture.  
24

25 490. By virtue of these knowing and intentional violations of 18 U.S.C. §§ 1590  
26 and 1595, Defendants are liable to Plaintiffs for the damages they sustained and  
27 reasonable attorneys' fees.  
28

**EIGHTEENTH CAUSE OF ACTION**  
**OBSTRUCTION OF THE ENFORCEMENT OF THE TRAFFICKING VICTIM**  
**PROTECTION ACT, 18 U.S.C. § 1590(b)**  
*(Plaintiffs Against All Defendants)*

491. Plaintiffs incorporate by reference and reallege each of the preceding paragraphs and all paragraphs below as though fully set forth and brought in this cause of action.

492. Defendants knowingly and intentionally obstructed, attempted to obstruct, interfered with, and prevented the enforcement of 18 U.S.C. § 1590 all in violation of 18 U.S.C. § 1590(b). This activity is hereinafter referred to collectively simply as “obstruction.”

493. Upon information and belief, Defendants obstruction of the enforcement of 18 U.S.C. § 1590 was forbidden by 18 U.S.C. § 1590(b), thereby violating Chapter 77, Title 18. Defendants’ obstruction described here and in the preceding paragraph directly, proximately, and foreseeably harmed Plaintiffs directly resulting in Plaintiffs being forced against their will to engage in nonconsensual sex acts.

494. Upon information and belief, Defendant Diddy has a well-documented history of criminal investigations. Defendants were on notice of Defendant Diddy’s proclivity to criminal activity. They knew or should have known that Defendant Diddy’s Sexual Abuse and Cover Up Enterprise sex trafficking operation would or could result in a criminal investigation by State and Federal prosecutors for violating (among other laws) the TVPA. Defendants should have taken a cue from the Federal Prosecutors arrest and prosecution of Jeffrey Epstein. The U.S. Attorney’s Office for the Southern District of New York indicted Epstein (and

1 unnamed “associates”) for violating the TVPA. Later, the same Office indicted  
2 Epstein’s co-conspirator, Ghislaine Maxwell, for conspiracy to entice minor victims  
3 to travel to be abused by Epstein. All named Defendants in this matter engaged in  
4 the same activities as Mr. Epstein and Ms. Maxwell. In fact, Defendants may have  
5 done worse.  
6

7 495. Upon information and belief, by concealing their actions thereafter,  
8 Defendants obstructed, interfered with, and prevented the State and Federal  
9 Government enforcement of the TVPA against Defendant Diddy to the extent that  
10 the Federal Government was able to ultimately charge Defendant Diddy with TVPA  
11 violations, the filing of those charges was delayed by Defendants actions. Because  
12 of that delay, Plaintiffs were forced to engage in nonconsensual sex acts.  
13  
14

15 496. One example of how Defendants obstructed, attempted to obstruct, interfered  
16 with, and prevented State and Federal Government’s enforcement of the TVPA,  
17 Defendants provided resources to Defendant Diddy, like security, victims, drugs,  
18 getaway driver and false alibi’s so that the forced sex acts would escape the  
19 detection of State and Federal law enforcement and prosecuting agencies.  
20 Defendants provided these resources to further the Diddy Sexual Abuse and Cover  
21 Up Enterprise sex trafficking venture with the purpose of helping Defendant Diddy  
22 and the other Defendants in evading criminal liability for violating the TVPA.  
23  
24

25 497. By providing this type of support to Defendant Diddy, Defendants intended  
26 and knew that Defendant Diddy’s depraved and egregiously forced sex acts would  
27  
28

1 escape the detection of law enforcement and prosecuting agencies for some period  
2 of time.

3 498. Defendants support furthered the Diddy Sexual Abuse and Cover Up  
4 Enterprise sex trafficking venture with the purpose of helping Defendant Diddy  
5 evade criminal liability for violating the TVPA.  
6

7 499. Upon information and belief, Defendants obstruction, attempted obstruction,  
8 interference with, and prevention of the enforcement of the TVPA were all done  
9 intentionally and knowingly. For example, Defendants knew that Defendant Diddy  
10 was high risk— specifically, high risk to violate the TVPA through continuing  
11 criminal sex trafficking activities due to his proximity to criminal activity as far  
12 back as 1991.  
13

14 500. Upon information and belief, Defendants were aware and participated and  
15 engaged in witness intimidation, and bribery to escape criminal liability. Including  
16 offering Plaintiff money to say that the sexual abuse and rape she suffered was  
17 consensual and for Plaintiff to say she was a sex worker. Defendants were fully  
18 aware that there were public allegations that Defendant Diddy's illegal conduct  
19 made through complaints in previous lawsuits. Defendants concealed information  
20 from the Federal Government in an intentional attempt to obstruct, in many ways  
21 interfered with, and prevented the enforcement of the TVPA by investigators and  
22 prosecuting agencies.  
23

24 501. Upon information and belief, Defendants relationship with Defendant Diddy  
25 went far beyond a normal (and lawful) partnership, relationship and friendship.  
26  
27  
28

1 Defendants knew, and intended, that its relationship with Defendant Diddy would  
2 go far beyond a normal relationship. Defendants knew that its decision to go beyond  
3 a normal employment and personal relationships with Defendant Diddy obstructed  
4 the ability of law enforcement and prosecuting agencies to enforce the TVPA.  
5

6 502. Upon information and belief, Defendants obstruction of the government's  
7 TVPA and other law enforcement efforts was intentional and willful and, therefore,  
8 Defendants intentionally and willfully caused Defendant Diddy's commission of the  
9 forcible sex acts with Plaintiffs through its obstruction supporting the concealment  
10 of the Diddy Sexual Abuse and Cover Up Enterprise sex trafficking venture.  
11 Defendants knew that Defendant Diddy would use means of force, threats of force  
12 fraud, coercion, and a combination of such means to cause Plaintiff to engage in  
13 nonconsensual sex acts.  
14  
15

16 503. Upon information and belief, Defendants knew, acted in reckless disregard of  
17 the fact, and should have known, that its obstruction in violation of 18 U.S.C. §  
18 1590(b) would directly and proximately lead to unlawful and forceful sex acts by  
19 Defendant Diddy with individuals, like Plaintiffs.  
20

21 504. Upon information and belief, Defendants obstruction has caused Plaintiffs  
22 serious harm, including, without limitation, physical, psychological, financial, and  
23 reputational harm. That harm was directly and proximately caused by the  
24 obstruction and the harm resulting from obstruction was foreseeable.  
25

26 505. Upon information and belief, Defendants obstruction has caused Plaintiffs  
27 harm that is sufficiently serious, under all the surrounding circumstances, to compel  
28

1 a reasonable person of the same background and in the same circumstances to  
2 perform or to continue performing sexual activity to avoid incurring further harm.

3 506. Upon information and belief, Defendants criminal conduct in obstructing  
4 enforcement of the TVPA was outrageous and intentional because it was in  
5 deliberate furtherance of a widespread and dangerous criminal sex trafficking  
6 organization.  
7

8 507. Defendants' obstruction also evinced a high degree of moral turpitude and  
9 demonstrated such wanton dishonesty as to imply a criminal indifference to civil  
10 obligations. Defendants' actions were directed specifically at Plaintiffs who were  
11 the victims of the Diddy Sexual Abuse and Cover Up Enterprise sex trafficking  
12 organization.  
13

14 508. By virtue of these violations of 18 U.S.C. § 1590(b), Defendants are liable to  
15 Plaintiffs for the damages they sustained and reasonable attorneys' fees by operation  
16 of 18 U.S.C. § 1595. Defendants perpetrated an obstruction of the TVPA, and  
17 therefore perpetrated a violation of Chapter 77, Title 18.  
18

19  
20 **NINETEENTH CAUSE OF ACTION**  
21 **FALSE IMPRISONMENT**  
*(Plaintiffs Against All Defendants)*

22 509. Plaintiffs incorporate by reference and reallege each of the preceding  
23 paragraphs and all paragraphs below as though fully set forth and brought in this  
24 cause of action.  
25

26 510. Defendants intentionally detained, and/or prevented Plaintiffs from leaving  
27 the premises therefore imprisoning Plaintiffs acting in deliberate malice and for the  
28

1 purpose of trafficking and/or sexually assaulting and raping Plaintiffs. Defendants  
2 imprisoned Plaintiffs without just or reasonable cause, without lawful privilege,  
3 without Plaintiffs' consent, and/or without probable cause for an appreciable amount  
4 of time; and therefore, deprived Plaintiffs of their personal civil liberties.  
5

6 Defendants' unlawful conduct resulted in the false imprisonment of Plaintiffs on  
7 March 23, 2018.

8  
9 511. Plaintiff Parham was invited to Defendant Shane's home as a guest. Plaintiff  
10 was under the impression she was in a safe environment where only she and  
11 Defendant Shane would be present.

12 512. On or about the date enumerated above, Plaintiff Parham's clothes, phone,  
13 purse, keys and cell phone were hid and confiscated in an effort to prevent her from  
14 leaving the premises after Defendant Diddy and the other Defendants arrived at  
15 Defendant Shane's residence.  
16

17 513. Defendants forced Plaintiff Parham, against her will and over her protest,  
18 with threats of physical violence forced Plaintiff to engage in nonconsensual sexual  
19 activities with Defendants Diddy, Shane, Odell, Druski and Doe.  
20

21 514. Defendants forced Plaintiffs Does, against their will and over their protest,  
22 with threats of physical violence trafficked, battered, assaulted and abused Plaintiffs.  
23

24 515. Plaintiffs were not released from their imprisonment until they made their  
25 harrowing escape as enumerated above in this Complaint.

26 516. Plaintiffs believe that procuring their false imprisonment was made  
27 intentionally, with actual malice, and was intended to harm Plaintiffs solely for  
28

1 purpose of the sexual gratification of Defendant Diddy and in furtherance of the  
2 Diddy Sexual Abuse and Cover Up Enterprise .

3 517. Malice is attributable to Defendant Diddy's actions as a joint tortfeasor in  
4 that he joined and facilitated the false imprisonment and maliciously instigated it.  
5 Malice is further attributable to Defendants Gonzalez, Valdez, Jaguar and Helena as  
6 security personnel for Defendant Diddy whose actions independently based on the  
7 fact that Defendant Diddy wanted to prevent Plaintiffs from being able to escape.  
8

9 518. As a legal result of Defendants' actions, Plaintiffs were physically, mentally  
10 and/or emotionally injured, all to an extent and in an amount subject to proof at trial.  
11

12 519. Defendants acted with malice and with the intent to cause injury to Plaintiffs  
13 or acted with a willful and conscious disregard of the rights of Plaintiffs in a  
14 despicable manner. In addition, Defendants engaged in despicable conduct that  
15 subjected Plaintiffs to cruel and unjust hardship in conscious disregard of their  
16 rights. Therefore, Plaintiffs are entitled to an award of punitive damages for the  
17 purpose of punishing those individual Defendants to deter them and others from  
18 such conduct in the future.  
19

20 520. As a proximate result of the acts of the Defendants, Plaintiffs have suffered  
21 great damage to their person, reputation and embarrassment.  
22

23 521. As an approximate results of the acts of Defendants, each of them herein  
24 alleged, Plaintiffs have been and will continue to be prevented from having a normal  
25 life. The amount of damage done to Plaintiffs are still ongoing and not fully known  
26 at this time.  
27  
28

1       522.       As an additional approximate result of the acts of Defendants, Plaintiffs were  
2       injured and their health, strength and activity, sustained shocking injury to their  
3       person and injury to their body, requiring several hospitalizations, treatments from  
4       therapists and other medical professionals. All of these injuries have caused  
5       Plaintiffs to suffer extreme and physical severe physical pain and mental anguish.  
6       These injuries will result in some level of permanent disability to the Plaintiffs.  
7

8       523.       As a further proximate result of the acts of Defendants, Plaintiffs were  
9       required to and did employ physicians, therapists and other medical professionals  
10       including hospitalizations for medical examinations, treatment, and care for the  
11       injuries resulting from this experience. Plaintiffs did and will incur medical and  
12       incidental expenses for the services.  
13

14       524.       The acts of Defendants, each of them herein alleged, were willful, wanton,  
15       malicious and oppressive, justifying the awarding of punitive damages.  
16

17                   **REQUEST FOR RELIEF**

18       **WHEREFORE**, Plaintiffs respectfully request judgment against Defendants,  
19       awarding compensatory, consequential, exemplary, punitive, restitution, unjust enrichment,  
20       equitable, and treble damages in an amount to be determined at trial; costs of suit;  
21       attorneys' fees; and such other and further relief as the Court may deem just and proper.  
22

23                   **DEMAND FOR JURY TRIAL**

24       Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demands a trial by jury  
25       on all issues so triable.  
26

27       Dated: March 7, 2025

28                   Respectfully submitted,

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**Law Offices of Shawn R. Perez**  
Shawn Perez (SBN 164228)  
[shawn@shawnperezlaw.com](mailto:shawn@shawnperezlaw.com)  
7121 West Craig Rd., #113-38  
Las Vegas, NV 89129  
Tel: (949) 492-9545

**The Law Office of Ariel Mitchell, P.A.**  
Ariel Mitchell (*Pro hac vice*)  
[ariel@arielesq.com](mailto:ariel@arielesq.com)  
500 NW 2<sup>nd</sup> Ave., #12864  
Miami, FL 33101  
Tel: (305) 903-5835  
*Attorneys for Plaintiffs*