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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

21 KELLYE CROFT,
22 Plaintiff,
23 vs.

Case No. _____

**COMPLAINT SEEKING
DAMAGES**

24 JAMES DOLAN, HARVEY
25 WEINSTEIN, JD & THE STRAIGHT
26 SHOT, LLC, THE AZOFF COMPANY
27 HOLDINGS LLC f/k/a/ AZOFF
MUSIC MANAGEMENT, LLC, THE
AZOFF COMPANY LLC f/k/a AZOFF

JURY TRIAL DEMANDED

28 **COMPLAINT SEEKING DAMAGES**

1 MSG ENTERTAINMENT, LLC, DOE
CORPORATIONS 1-10,

2 Defendants.
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COMPLAINT SEEKING DAMAGES

**TRIGGER WARNING:
THIS DOCUMENT CONTAINS HIGHLY GRAPHIC INFORMATION OF A
SEXUAL NATURE, INCLUDING SEXUAL ASSAULT**

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Plaintiff Kellye Croft alleges as follows:

PRELIMINARY STATEMENT

1. In 2018, James Dolan sent an email to his “friends” sharing the debut of a new song he wrote. He explained that the song was about his feelings about friends of his who were alleged to have used “power to coerce or force sexual gratification”—a clear reference to his former best friend and now convicted sexual predator Harvey Weinstein, who had recently been outed as a serial perpetrator of rape and sexual assault.

2. The chorus of the song, “I Should’ve Known,” is as follows:

I should’ve known
I should’ve known
I should’ve thrown
Myself across his tracks
Stopped him from these vile attacks
I should’ve known
We believed and didn’t see
Through the lies he told us all
They led him to his endless fall
I should’ve known
I should’ve known

3. Among the “friends” Dolan sent this email to was Kellye Croft, a young woman from Smyrna, Tennessee. Dolan met Ms. Croft in 2013, when she was 27 years old and he was 58 years old, and when she was working as a Licensed Massage Therapist on tour with the rock band, the Eagles. Dolan, upon information and

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1 belief, significantly contributed to the financing for that tour, and his band, JD &
2 The Straight Shot, opened for the Eagles.

3 4. Upon hearing this song, Ms. Croft was horrified—not just by the
4 mediocrity of Dolan’s music, but moreover by the blatant lie the song told.

5
6 5. In January 2014, Dolan and related companies brought Ms. Croft to Los
7 Angeles. Although Ms. Croft was purportedly to perform work as a Licensed
8 Massage Therapist, in reality, she was being trafficked by Dolan—a man over three
9 decades older than her—under fraudulent pretenses for Dolan to engage in unlawful
10 and unwelcome sex acts with her.

11
12
13 6. Adding insult to injury, during this trip—because of Dolan’s actions in
14 facilitating, enabling, and aiding Weinstein in meeting Ms. Croft—Ms. Croft also
15 fell victim to one of Weinstein’s “vile attacks” mentioned in Dolan’s song.

16
17 7. Immediately after the attack by Weinstein, she told Dolan what
18 happened.

19
20 8. Contrary to Dolan’s overly-insistent incantation in 2018 that he
21 “should’ve known” about Weinstein’s problematic behavior—he did know. Dolan
22 knew about Weinstein’s predatory behavior prior to January 2014 as he readily
23 admitted to Ms. Croft that he knew all about Weinstein’s history of assaulting and
24 sexually abusing women, telling her that “we all know” that Weinstein “has
25 problems,” and insisting that “his friends” were trying to get him “help.”
26
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1 9. Ms. Croft was upset by Dolan’s response, but at the time she was
2 completely unaware of the extent to which Dolan, Weinstein, and Irving Azoff,
3 manager of the Eagles, were all close friends and business partners. As evidenced
4 by the pictures below, these men were close to one another, and thus almost certainly
5 knew details about each other’s personal lives.
6



James Dolan and Harvey Weinstein, 2005



James Dolan and Harvey Weinstein, 2014

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James Dolan, Irving Azoff, and Harvey Weinstein, 2015

10. Nor did Ms. Croft know that Dolan had a reputation for being brutish and difficult to work with. Dolan’s unlawful acts and misogynist views are now widely known, with Dolan having been found liable for attempting to silence Anucha Browne by terminating her employment after she complained about being sexually harassed by Isiah Thomas. Even years after the \$11.6 million jury verdict, Dolan refused to accept responsibility for his actions, claiming that Ms. Browne made up many of her allegations.

11. In short, by claiming that he “should’ve known,” James Dolan doth protest too much. Although for many years, Ms. Croft had been too traumatized by these events to speak publicly about what happened to her, she is ready to speak out about what Dolan and Weinstein separately did to her, and the ways in which Dolan facilitated—and orchestrated—Weinstein’s horrific attack. She needs the world to know: James Dolan unlawfully trafficked her for his own sexual gratification and

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1 knew about Weinstein’s predatory behavior well before he published his musical
2 mistruths; in fact, he knew before he joined the Board of Directors of Weinstein’s
3 production company.
4

5 **PARTIES**

6 12. Plaintiff Kellye Croft is a 38-year-old woman and is a resident of the
7 State of Tennessee.

8 13. Defendant Harvey Weinstein is, on information and belief, a citizen of
9 the State of New York and presently is incarcerated at the Mohawk Correctional
10 Facility in Rome, New York.

11 14. Defendant James Dolan is, on information and belief, a citizen of the
12 State of New York.
13

14 15. Defendant JD & The Straight Shot, LLC is a New York domestic
15 liability company. On information and belief, JD & The Straight Shot, LLC is
16 substantially or entirely owned, directly or indirectly, by Dolan.
17

18 16. Defendant The Azoff Company Holdings, LLC, formerly known as
19 Azoff Music Management LLC, is a music manager and is a Delaware limited
20 liability corporation.
21

22 17. Defendant The Azoff Company LLC, formerly known as Azoff MSG
23 Entertainment LLC, was a 2013 joint venture between Azoff Music Management
24 LLC and The Madison Square Garden Company. In or about 2018, Azoff Music
25 Management LLC acquired the portion of the joint venture owned by Madison
26 Management LLC acquired the portion of the joint venture owned by Madison
27 Management LLC acquired the portion of the joint venture owned by Madison
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1 Square Garden Company. The Azoff Company is a Delaware limited liability
2 company.

3 18. Defendants The Azoff Company Holdings, LLC and The Azoff
4 Company, LLC are collectively referred to herein as the “Azoff Entities.” On
5 information and belief, the Azoff Entities are directly or indirectly owned in
6 substantial part by Irving Azoff. The Azoff Entities with JD & The Straight Shot,
7 LLC are together referred to herein as the “Corporate Defendants.”
8
9

10 19. During the relevant period, Ms. Croft was jointly employed by the
11 Azoff Entities and JD & The Straight Shot, LLC, which were jointly responsible for
12 paying Ms. Croft and controlling her work.
13

14 20. Doe Corporations 1-10 are unknown successor and related entities of
15 the Corporate Defendants who, on information and belief, participated in the events
16 described within that are the basis of Plaintiff’s claims.
17

18 **JURISDICTION AND VENUE**

19
20 21. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343, as
21 this action asserts violations of 18 U.S.C. § 1591, *et seq.*, and therefore raises federal
22 questions regarding the deprivation of Plaintiff’s rights. The Court has supplemental
23 jurisdiction over Plaintiff’s related claims arising under state law pursuant to 28
24 U.S.C. § 1367(a).
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1 22. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this Court because
2 a substantial part of the events or omissions giving rise to this action, including the
3 intentional and negligent tortious conduct alleged herein, occurred in this District.

4
5 **FACTS**

6 **I. Ms. Croft Joins The Eagles on Tour**

7
8 23. Kellye Croft was born and raised in Tennessee, and by her mid-
9 twenties, had achieved success in her dream career as a Licensed Massage Therapist
10 with her own small studio.

11
12 24. In fall of 2013, she was presented with what she believed was her big
13 break, and the opportunity of a lifetime—to serve as the massage therapist for Glenn
14 Frey of the legendary rock band, the Eagles, on their tour, “History of the Eagles –
15 Live in Concert.”

16
17 25. For Ms. Croft, this was an unprecedented opportunity, and her friends
18 and family were incredibly proud. At the same time, Ms. Croft was intimidated by
19 the offer to travel across the country with a world-famous rock band: she had not
20 traveled extensively before, had never lived on her own, and had never spent more
21 than a few nights away from her tight-knit Tennessee community.

22
23
24 26. After a few shows with the Eagles in October 2013, Ms. Croft was
25 thrilled when Tom Golseth, the Eagles’ tour manager, reached out to her to see if
26 she would be available to join the band on tour in North Carolina, Alabama, and
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1 Florida in November. She gladly accepted the position, and the band arranged for
2 Ms. Croft's massage table to be transported with the band.

3 27. While traveling with the band was an exciting experience, Ms. Croft
4 was also overwhelmed. This was particularly true because she did not know anyone
5 else on the tour, and therefore felt extremely isolated.
6

7 28. The experience became even more lonely and stressful for Ms. Croft
8 when she got into a disagreement with Golseth, who had inappropriately chastised
9 her and embarrassed her in front of other tour members.
10

11 29. To make matters worse, soon after these interactions took place,
12 Golseth was fired from the Eagles tour. Thereafter, Ms. Croft became completely
13 ostracized from other tour members, who believed she was the reason for the tour
14 manager's firing.
15
16

17 **II. Ms. Croft Meets Dolan and Is Lured into Unwanted Sexual Contact**

18 30. In addition to serving as Frey's masseuse, tour management gave Ms.
19 Croft permission to open up massage slots for others on the tour and she did her best
20 to help and accommodate others who requested her services.
21

22 31. During the November 2013 leg of the tour, Ms. Croft regularly shared
23 her business card with others backstage, both to generate business and to counteract
24 the profound sense of isolation she felt while traveling with the band.
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1 32. On one occasion, she shared her card with James Dolan, the lead singer
2 of the band opening for the Eagles, JD & The Straight Shot. Ms. Croft had never
3 heard of Dolan, and when she met him, did not know the immense wealth, power,
4 and influence he had. She later came to understand that Dolan was in multiple
5 business ventures with the Eagles management company, Azoff Music
6 Management, and heard that Dolan was a significant funder of the tour, which
7 allowed him to place his mediocre band as the opening act.
8
9

10 33. Days after Golseth was fired, Dolan scheduled a massage with Ms.
11 Croft. Given her unfamiliarity with Dolan, she did not think much of the
12 appointment—in fact, she was extremely distracted, as the appointment fell within
13 days of the incident with Golseth and very soon after news broke that Golseth was
14 fired from the tour—purportedly because of what occurred between him and Ms.
15 Croft.
16
17

18 34. Dolan noticed how upset Ms. Croft was, and he asked her to explain
19 what was wrong. She explained what had happened, and Dolan responded to her
20 stating, “I will make sure this is taken care of.” Ms. Croft dismissed her massage
21 client’s statement, not recognizing how much power and influence Dolan had over
22 others on the tour.
23
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25 35. Ms. Croft did not know, for example, that Dolan was extremely close
26 friends with Irving Azoff, who, through his company, was the music manager for
27
28

1 both the Eagles and JD & The Straight Shot. Indeed, around this time, Dolan was
 2 one of a select group of friends who Azoff called every morning to “chat” and “get
 3 ready for battle.”¹ When Dolan and Irving Azoff started Azoff MSG Entertainment
 4 LLC in or about September 2013, Dolan publicly stated that Irving Azoff “was going
 5 to run everything.” Dolan also stated, “We’re going to be a good partner, but [Irving
 6 Azoff] is not subject to a board of directors. He just has me.”²

7
 8
 9 36. At some point after Dolan’s statement to Ms. Croft that he would take
 10 care of her predicament, Frey called Ms. Croft and apologized repeatedly and
 11 profusely to her for the situation with Golseth. Ms. Croft found this behavior
 12 extremely out of character for Frey.

13
 14 37. In mid-November 2013, Ms. Croft joined the band in Miami for another
 15 part of the Eagles tour. Unfortunately, Ms. Croft continued to feel ostracized by
 16 others because of Golseth’s firing and was even more isolated than before.

17
 18 38. During this trip, Dolan scheduled his second massage with Ms. Croft.
 19 Dolan asked Ms. Croft how the situation concerning Golseth had evolved, and Ms.
 20 Croft noted that Frey had apologized to her and that she hoped things would get
 21 better, although noted that she still felt isolated. Dolan responded, “I told you it
 22
 23

24
 25 ¹ See Scott Cacciola, *The Man in the Middle*, N.Y. Times (March 24, 2014),
www.nytimes.com/2014/03/25/sports/basketball/the-man-in-the-middle-of-the-knicks-deal-with-jackson.html (last accessed January 15, 2024).

26 ² Todd Martens, *Madison Square Garden Invests \$125 million in Irving Azoff Firm*, L.A. Times
 27 (Sept. 4, 2013), <https://www.latimes.com/entertainment/music/posts/la-et-ms-madison-square-garden-125-million-irving-azoff-firm-20130904-story.html> (last accessed January 15, 2024).

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1 would be taken care of,” thereby insinuating that he was the one who caused Frey to
2 apologize to her.

3 39. At that moment, Ms. Croft began to understand the power Dolan had
4 on the tour—he was even able to get Frey to apologize to her.

5
6 40. At that same time, in the context of Ms. Croft’s professional massage
7 of Dolan, he felt emboldened to further flex his power and influence over Ms. Croft.
8 Towards the end of the massage, Dolan pulled Ms. Croft towards him. She tried to
9 push away, stating that she was very uncomfortable and that she took her job as a
10 masseuse very seriously and that she wanted to remain professional.

11
12
13 41. Ms. Croft tried to bring the massage to an end, but Dolan proceeded to
14 come on even stronger, treating Ms. Croft’s resistance as part of a challenge or a
15 game.

16
17 42. Dolan then grabbed Ms. Croft’s hands, dragging her to a couch in the
18 same room and forcing her hands between his knees as he sat down. Ms. Croft was
19 adamant that she did not want to have any sexual interactions with Dolan, who was
20 married at the time and over thirty years older than Ms. Croft.

21
22 43. Dolan was extremely assertive, and pressured Ms. Croft into unwanted
23 sexual intercourse with him. She felt disgusted and terrified of the situation, but the
24 extreme isolation she felt from others on the tour, coupled with Dolan’s attention to
25 her, his assertions that he would take care of her, and her recognition that this man
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1 held immense power over everyone’s position on the tour—including hers—led her
2 to submit to Dolan’s advances.

3 44. Following this unwanted sexual contact, Ms. Croft was summoned to
4 Dolan’s room multiple times during the remainder of that part of the tour. On each
5 of these occasions, Dolan made unwelcome advances toward Ms. Croft, and she felt
6 obligated to submit to sex with him.
7

8 45. Dolan was extremely manipulative, constantly reminding Ms. Croft of
9 the way he “fixed” the situation with Golseth for her. He would also regularly name-
10 drop famous celebrities and sports stars he said were his friends. Although Dolan
11 claimed to be sober, Ms. Croft saw multiple bottles of Valium and Ambien in
12 Dolan’s possession.
13

14 46. Ms. Croft was disgusted by Dolan, but her youth and extreme loneliness
15 while on the road with strangers, as well as Dolan’s immense power, made it possible
16 for Dolan to manipulate Ms. Croft and lure her under his control.
17

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20 **III. Dolan and Other Entities Traffick Ms. Croft to California**

21 47. Around the end of 2013, Ms. Croft received a request from the Azoff
22 Entities to join the tour in Los Angeles, California.
23

24 48. Although Ms. Croft understood that she was being flown out to
25 California by the Azoff Entities to work for the Eagles and Frey, she later learned
26 that she was working for both the Eagles and Dolan. Marc Robbins, an executive
27

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1 with the Azoff Entities, forwarded Ms. Croft an email that suggested her flight to
2 California would be would be expensed on “the JD credit card.” On information and
3 belief, “JD” referred to James Dolan and/or JD & The Straight Shot.
4

5 49. Ms. Croft thought it was strange that she was invited to Los Angeles,
6 as normally when the Eagles were in a major city, the band members were too busy
7 to schedule massages with her. Frey also lived in California and had another
8 masseuse on call in Los Angeles, so Ms. Croft was not needed. Nevertheless, Ms.
9 Croft was grateful for the work and accepted the invitation. When she did so, Ms.
10 Croft did not know that JD & The Straight Shot and Dolan would be opening for the
11 Eagles on this part of the tour.
12

13 50. In Los Angeles, the Azoff Entities, including Robbins, arranged for Ms.
14 Croft to be picked up at the airport by an employee of the Azoff Entities and to stay
15 at The Peninsula Hotel in Beverly Hills. Unlike the other tour stints that she joined
16 with the Eagles, Ms. Croft was not housed at the same hotel as the band and the other
17 tour support staff; instead, she was at the same hotel as Dolan and JD & The Straight
18 Shot.
19

20 51. Ms. Croft was given a room to perform massages at the Forum, the
21 newly re-opened venue funded by Irving Azoff and James Dolan. Ms. Croft spent
22 the majority of the time in Los Angeles by herself in the room at the Forum. Almost
23 no tour members signed up for massage appointments.
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1 52. Although the Azoff Entities purported to fly Ms. Croft from Tennessee
2 to California to perform legal massage services for the Eagles and other tour
3 members, in reality, Ms. Croft was flown out to Los Angeles for the purposes of
4 engaging in unwanted sexual acts with Dolan. On information and belief, the Azoff
5 Entities arranged for Ms. Croft to be brought to California at Dolan’s request. In
6 doing so, the Azoff Entities knew or acted in reckless disregard to the fact that Dolan
7 sought Ms. Croft’s presence not for legitimate business purposes, but because he
8 wished to sexually exploit Ms. Croft.
9

10
11 53. Indeed, Dolan expected Ms. Croft to have sexual interactions with him
12 during the tour, and she spent her time either isolated by herself or waiting for
13 instructions from Dolan.
14

15 54. At times, Dolan acted romantically toward Ms. Croft, pretending that
16 he had brought her to California for something more than merely satisfying his desire
17 to have a sex-fueled “rock star” experience on the road. Ms. Croft’s youthful naivete
18 led her to believe, at the time, that Dolan actually cared about her.
19

20
21 55. Dolan even suggested that he would rent a car and drive with Ms. Croft
22 down the Pacific Coast Highway. Instead, Ms. Croft was left alone at the Forum or
23 at The Peninsula while other tour members socialized.
24

1 **IV. Dolan Fraudulently Coordinates a Meeting Between Ms. Croft and**
2 **Harvey Weinstein**

3 56. A few days into this leg of the tour, on January 21, 2014, Dolan
4 encouraged Ms. Croft to join two female assistants from Irving Azoff Management
5 for shopping and dinner in Los Angeles. After shopping for clothes, the three
6 women had dinner at a burger restaurant. Ms. Croft was nervous and uncomfortable
7 around these two strangers.
8

9
10 57. When she returned to the Peninsula, she waited for the elevator to her
11 floor next to a large man she had never seen before while holding her shopping bags
12 and a box of leftover food. When the elevator arrived, Ms. Croft and the man entered
13 the elevator together.
14

15 58. In the elevator, the large man asked Ms. Croft, “who is that to-go box
16 for?” She responded that she was going to give it to her friend James Dolan, who
17 was also staying at the hotel.
18

19 59. The man responded to Ms. Croft that Dolan was “one of his best
20 friends,” and proceeded to ask Ms. Croft if she was “the massage therapist.”
21 According to the man, Dolan had mentioned his massage therapist and had said great
22 things about her. He introduced himself as Harvey Weinstein.
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1 60. Ms. Croft did not know much about Weinstein other than what she had
2 heard from Dolan himself, who had boasted about having a “buddy” who worked
3 on all the cool movies in Hollywood.
4

5 61. In the elevator, Weinstein suggested that he might have work
6 opportunities for Ms. Croft, stating that “we always need massage therapists on set
7 for actors and actresses.” He asked Ms. Croft if she would be interested in such an
8 opportunity.
9

10 62. Ms. Croft was stunned by the offer and said that she would be happy to
11 discuss such a role.
12

13 63. Weinstein suggested that they discuss the job opportunity immediately,
14 and he insisted that Ms. Croft join him in his suite to continue the conversation.
15

16 64. Ms. Croft’s hotel room was near Weinstein’s. Because she had no other
17 obligations that evening, she agreed to join Weinstein to discuss what sounded like
18 a dream job opportunity.
19

20 65. After entering Weinstein’s suite, Ms. Croft sat down on a couch in the
21 living room area and set down her to-go box and shopping bags near her. Weinstein
22 nodded towards Ms. Croft’s shopping bags and told her that she should try on the
23 clothes she purchased for him. Weinstein told Ms. Croft that as a producer for the
24 show Project Runway, he “really knew” clothes and could tell when things “fit
25 properly.”
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1 66. Although confused by the request, Ms. Croft was extremely intimidated
2 by Weinstein. As Ms. Croft began to take her shopping bags to the bathroom in the
3 living room area of the suite, Weinstein stopped her, telling her to try on the clothes
4 “out here,” insisting that “that’s how we do it here.”

5
6 67. Ms. Croft explained that she was not comfortable with changing in front
7 of him and proceeded to the bathroom. Weinstein appeared amused at Ms. Croft’s
8 protestations.
9

10 68. After trying on some clothes, Ms. Croft returned to the couch to discuss
11 the work opportunity Weinstein had mentioned. Weinstein handed Ms. Croft a
12 drink, but she only took a sip or two, wanting to focus instead of the potential
13 business opportunity.
14

15 69. Weinstein was extremely complementary towards Ms. Croft, noting
16 that she reminded him of actress Reese Witherspoon.
17

18 **V. Weinstein Sexually Assaults Ms. Croft and Ms. Croft Immediately**
19 **Reports the Assault to Dolan**

20 70. As the conversation turned to massage therapy, Weinstein asked Ms.
21 Croft if she could “show [him] what she could do” and requested that she give him
22 a massage. Ms. Croft immediately dismissed the request, noting that she was very
23 particular about only performing massages properly using her massage table.
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1 71. Around this time, Weinstein came behind Ms. Croft on the couch and
2 began rubbing her shoulders, again requesting that she massage him.
3 Uncomfortable, Ms. Croft again stated she would not perform any massage without
4 the proper set up.
5

6 72. Weinstein then excused himself to go to the bathroom. When he
7 returned to the living room area of the suite, he was wearing a loosely tied bathrobe
8 and appeared to be naked underneath the bathrobe. While standing mostly unclothed
9 in front of Ms. Croft, he asked her, “so, when are you going to give me a massage?”
10

11 73. Ms. Croft was terrified and panicked. She immediately tried to figure
12 out a way to avoid the escalating situation. She reiterated that it was very important
13 to have her massage table, especially for someone with a “greater stature” like
14 Weinstein. Frantic to avoid what Weinstein was requesting, she also suggested that
15 she would need permission the Eagles to perform any other massages, as she was
16 brought out to Los Angeles for them specifically.
17

18 74. Weinstein was unphased by Ms. Croft’s attempts to get away and asked
19 her to look at the bed in the bedroom of the suite because it was “perfect” for a
20 massage.
21

22 75. When Ms. Croft again said she was not comfortable with the situation,
23 Weinstein began to get irritated and angry with her. He stated, “well this is just how
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1 people do things in Hollywood, if you will not be reasonable and are not able to
2 handle requests on the fly, you won't make it in Hollywood.”

3 76. Ms. Croft agreed to look at the bed, but again assured Weinstein that
4 the bed would not work for a massage, and that she really needed her table and for
5 his body to be draped with a sheet or blanket. Weinstein became very angry, stating
6 that Ms. Croft could easily massage him on the bed and that he liked to be completely
7 naked.
8

9
10 77. Ms. Croft tried to leave the room, but Weinstein blocked the door to
11 prevent her from leaving. Terrified and desperate, Ms. Croft tried one last attempt
12 to avoid Weinstein, stating that she felt “so lucky to have the opportunity to work
13 on” Weinstein and wanted to make sure that it was done correctly so that she could
14 show him what she is capable of. Weinstein reluctantly agreed and allowed Ms.
15 Croft to exit the suite.
16

17
18 78. Ms. Croft hurried down the hallway to her hotel room, but as she left,
19 she realized that Weinstein had followed her out of his suite down the hallway. He
20 was still only wearing a loosely tied bathrobe.
21

22 79. Ms. Croft arrived at her room and rushed inside. Once inside, Ms. Croft
23 attempted to push the door closed. As the door closed, though, Weinstein stuck his
24 foot in the opening of the door and pushed the door open. He barged into Ms. Croft's
25 hotel room.
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1 80. Weinstein then backed Ms. Croft onto the bed, forced her down, and
2 forced her legs open. Standing between her legs, he undid his robe, and shoved his
3 fingers inside of her, using his other hand to hold her down. He tried to force his
4 penis inside of her, although he struggled to do so.
5

6 81. Ms. Croft fought back the best she could, although she recalls that
7 Weinstein felt like a giant compared to her. She struggled to sit up, push him away,
8 and tried as hard as she could to keep her legs together.
9

10 82. In the midst of the assault, Ms. Croft’s hotel room phone began to ring.
11 She tried to use the phone as an excuse to escape, stating “that’s probably Jim Dolan
12 calling me, he is going to come down here if I don’t answer his call.”
13

14 83. Ms. Croft managed to wriggle away enough to grab the phone, and
15 discovered that it was, in fact, Dolan calling her. She picked up the call and told
16 Dolan that she would be with him shortly.
17

18 84. After hearing her speak to Dolan, Weinstein backed off of Ms. Croft.
19 He then stated to her, “well, you know Jim and I are best friends. He’s going to be
20 very disappointed that you led me on, this won’t look good for you.” Weinstein then
21 left Ms. Croft’s hotel room.
22

23 85. Rattled and shaken, Ms. Croft went to Dolan’s hotel room. She was
24 visibly upset, and Dolan inquired what was wrong.
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1 86. In response, Ms. Croft told Dolan that she had met Weinstein in the
2 elevator lobby, had joined him for a discussion, and that Weinstein was “sexually
3 aggressive” with her.
4

5 87. Dolan was not at all surprised by the fact that Ms. Croft had “randomly”
6 happened to meet one of his “best friends” at the hotel. Nor, incredibly, did Dolan
7 express any surprise at the news that Weinstein was “sexually aggressive” with Ms.
8 Croft. To the contrary, Dolan responded to Ms. Croft’s report of sexual assault in a
9 completely matter-of-fact tone, noting that Weinstein was “a troubled person” that
10 had a lot of “serious issues,” but that his friends were “trying to get him to address”
11 those issues. Dolan intimated that Weinstein was not a “safe” person but did little
12 to console Ms. Croft or help her to report the assault to the authorities. Indeed, with
13 his comments, Ms. Croft felt that Dolan completely dismissed the gravity of the
14 situation and did not truly care about what his friend had done to her.
15
16
17

18 88. The day after the attack, Ms. Croft attempted to work but felt so
19 physically and emotionally unwell that Robbins, the executive from the Azoff
20 Entities, sent a doctor to see her. In the following days, Ms. Croft felt so physically
21 and emotionally unwell that she called out sick from work. She found herself unable
22 to leave her hotel room, wracked with shame and disgust, and completely isolated.
23
24
25 Dolan was aware that Ms. Croft was unwell after Weinstein’s horrific attack.
26
27
28

1 89. Ms. Croft left the tour after the Los Angeles concerts heartbroken and
2 traumatized.

3 90. The Azoff Entities arranged and paid for Ms. Croft’s return flight from
4 Los Angeles to Tennessee.
5

6 **VI. Ms. Croft Suffers Following Dolan’s Exploitation and Manipulation**
7 **and Weinstein’s Horrific Sexual Attack**

8 91. Ms. Croft was never the same after her experiences on tour with the
9 Eagles.
10

11 92. When she returned home to Tennessee, her friends and family noticed
12 that she was no longer as happy and energetic as she used to be.
13

14 93. Moreover, she lost her passion and love for massage therapy—a
15 practice she had previously devoted her life to. When she had scheduled massage
16 appointments with clients following the tour, she would often have panic attacks
17 leading up to the appointment. On multiple occasions, just before starting a massage,
18 Ms. Croft’s muscles would tense so extremely that she could not move her hands or
19 perform a massage. On these occasions, she would retreat to an empty room where
20 she would cry and shake until she could call her parents to pick her up.
21
22

23 94. To cope with the incessant stress and horrific memories of the tour, Ms.
24 Croft turned to drugs and alcohol to forget about the assault and to assuage her
25 feelings of shame and guilt for getting roped into Dolan’s manipulations. Her
26
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1 substance use turned to abuse, and she later required extensive rehabilitation to cope
2 with her depression and the related substance use.

3 95. Weinstein’s assault and Dolan’s unlawful sex trafficking and
4 manipulation—both together and separately—weighed on Ms. Croft for years. She
5 struggled to form healthy relationships with men, as she felt betrayed by her trusting
6 nature, believing it led Dolan to take advantage of her and allowed Weinstein to
7 attack her.
8

9
10 96. Tragically, Ms. Croft has since abandoned her lifelong love of massage
11 therapy. She is unable to engage in the healing physical practice that she cared so
12 deeply for, as now it carries all of the pain and devastation caused by Dolan and
13 Weinstein.
14

15 **FIRST CAUSE OF ACTION**
16 **(Violation of 15 U.S.C. § 1591)**
17 ***Against James Dolan and The Corporate Defendants***

18 97. Plaintiff repeats and realleges each and every allegation in all of the
19 preceding paragraphs as if fully set forth herein.
20

21 98. Plaintiff is a victim of sex trafficking within the meaning of 18 U.S.C.
22 § 1591(a) and (b) and is therefore entitled to bring a civil action under 18 U.S.C.
23 § 1595.
24

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1 99. Defendant Dolan and the Corporate Defendants formed a venture as
2 defined by 18 U.S.C. § 1591 given that they constituted a “group of two or more
3 individuals associated in fact, whether or not a legal entity.”
4

5 100. Defendants’ acts and omissions, taken separately and/or together, as
6 outlined above, constitute a violation of 18 U.S.C. § 1591. Specifically, Defendant
7 James Dolan and the Corporate Defendants perpetrated sex trafficking of Ms. Croft
8 by transporting her to California for the purposes of providing sexual favors, and all
9 Defendants benefitted from Dolan’s venture by keeping Ms. Croft subject to Dolan’s
10 demands and desires. At all relevant times, Defendants participated in and facilitated
11 the harboring and transportation of Plaintiff for purposes of sex induced by force,
12 fraud, or coercion.
13
14

15 101. The Corporate Defendants, including the Azoff Entities, have
16 financially and otherwise benefited as a result of these acts and omissions by keeping
17 Dolan satisfied. In addition to the extremely close personal relationship between
18 Dolan and Irving Azoff, Dolan was a critically important business partner for the
19 Azoff Entities, reflected by Dolan’s decision to have Madison Square Garden invest
20 \$175 million in Azoff MSG Entertainment, LLC and to serve as a funding source
21 for the Eagles 2014 tour. The Azoff Entities thus benefited from facilitating Dolan’s
22 behavior to the extent it kept their partner, a notoriously erratic billionaire, happy.
23
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1 102. As a direct and proximate result of Defendants’ unlawful conduct as
2 alleged hereinabove, Plaintiff has suffered physical injury, severe emotional distress
3 and anxiety, humiliation, embarrassment, post-traumatic stress disorder, economic
4 harm, and other consequential damages.
5

6 103. Plaintiff also seeks reasonable attorneys’ fees as provided under 18
7 U.S.C. § 1595(a).
8

9 **SECOND CAUSE OF ACTION**
10 **(Sexual Assault/Forcible Touching)**
11 ***Against James Dolan***

12 104. Plaintiff repeats and realleges each and every allegation in all of the
13 preceding paragraphs as if fully set forth herein.
14

15 105. Defendant James Dolan committed an assault and battery against
16 Plaintiff because he intentionally engaged in trafficking Plaintiff for commercial sex
17 acts, and engaged in unlawful, intentional, and offensive touching or application of
18 force to Plaintiff’s person, where Plaintiff did not act freely and voluntarily with
19 knowledge of the nature of the transactions involved, as defined in Cal. Penal Code
20 §§ 236.1, 240, 243, 243.4, and 261.
21

22 106. As a result of Dolan’s alleged conduct, Plaintiff has suffered physical
23 injury, severe emotional distress, humiliation, embarrassment, anxiety, economic
24 harm, and other consequential damages.
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1 107. The conduct of Dolan described above was willful, wanton, and
2 malicious. At all relevant times, Dolan acted with conscious disregard of Plaintiff’s
3 rights and feelings, acted with the knowledge of or with reckless disregard for the
4 fact that his conduct was certain to cause injury and/or humiliation to Plaintiff, and
5 intended to cause fear, physical injury, and/or pain and suffering to Plaintiff. By
6 virtue of the foregoing, Plaintiff is entitled to recover punitive and exemplary
7 damages from James Dolan according to proof at trial.
8
9

10 **THIRD CAUSE OF ACTION**
11 **(Sexual Assault/Forcible Touching)**
12 ***Against Harvey Weinstein***

13 108. Plaintiff repeats and realleges each and every allegation in all of the
14 preceding paragraphs as if fully set forth herein.
15

16 109. Defendant Harvey Weinstein committed an assault and battery against
17 Plaintiff because he intentionally engaged in unlawful, intentional, and offensive
18 touching or application of force to Plaintiff’s person , as defined in Cal. Penal Code
19 §§ 240, 243, 243.4 and 261.
20

21 110. As a result of Harvey Weinstein’s alleged conduct, Plaintiff has
22 suffered physical injury, severe emotional distress, humiliation, embarrassment,
23 anxiety, economic harm, and other consequential damages.
24

25 111. The conduct of Harvey Weinstein described above was willful, wanton,
26 and malicious. At all relevant times, Harvey Weinstein acted with conscious
27

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1 disregard of Plaintiff’s rights and feelings, acted with the knowledge of or with
2 reckless disregard for the fact that his conduct was certain to cause injury and/or
3 humiliation to Plaintiff, and intended to cause fear, physical injury, and/or pain and
4 suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover
5 punitive and exemplary damages from Harvey Weinstein according to proof at trial.
6

7
8 **FOURTH CAUSE OF ACTION**
9 **(Aiding and Abetting Sexual Assault and Forcible Touching)**
10 ***Against James Dolan***

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

13 113. Defendant James Dolan aided, abetted, advised, encouraged, enabled,
14 and facilitated Defendant Harvey Weinstein’s battery and assault of Plaintiff by
15 orchestrating and facilitating a meeting between Weinstein and Plaintiff for the
16 purposes of Weinstein engaging in sex acts with Plaintiff, and Weinstein did in fact
17 intentionally engage in unlawful, intentional, and offensive touching or application
18 of force to Plaintiff’s person, as defined in Cal. Penal Code §§ 240, 243, 243.4 and
19 261.
20

21
22 114. As a result of James Dolan’s alleged conduct in aiding and abetting
23 Weinstein’s criminal acts, Plaintiff has suffered physical injury, severe emotional
24 distress, humiliation, embarrassment, anxiety, economic harm, and other
25 consequential damages.
26
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1 115. The conduct of James Dolan described above was willful, wanton, and
2 malicious. At all relevant times, James Dolan acted with conscious disregard of
3 Plaintiff's rights and feelings, acted with the knowledge of or with reckless disregard
4 for the fact that his conduct was certain to cause injury and/or humiliation to
5 Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to
6 Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and
7
8
9 exemplary damages from James Dolan according to proof at trial.

10 **PRAYER FOR RELIEF**

11 **WHEREFORE**, Plaintiff prays judgment be entered in her favor against
12 Defendants, and each of them, as follows:

- 13 1. For a money judgment representing compensatory damages including
14 consequential damages, lost wages, earning, and all other sums of money, together
15 with interest on these amounts, according to proof;
16
17 2. For an award of money judgment for mental pain and anguish and
18 severe emotional distress, according to proof;
19
20 3. For punitive and exemplary damages according to proof;
21
22 4. For attorneys' fees and costs;
23
24 5. For prejudgment and post-judgment interest; and
25
26 6. For such other and further relief as the Court may deem just and proper.
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JURY DEMAND

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

Dated: January 16, 2024

Respectfully submitted,

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