

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

<p>APRIL LAMPROS,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SEAN COMBS, BAD BOY RECORDS, ARISTA RECORDS, a subsidiary of SONY MUSIC ENTERTAINMENT, JOHN and JANE DOES 1-10 and ABC CORPS. 1-10</p> <p style="text-align: center;">Defendants.</p>
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Case Number:

**Plaintiff Designates  
New York County is the  
venue for Trial**

**SUMMONS**

To the named Defendant (s):

**YOU ARE at this moment SUMMONED** to answer the Complaint in this action and serve a copy of your answer or, if the Complaint is not served with this summons, to serve a notice of appearance on the Plaintiffs' Attorneys within 20 days after the service of this summons. Exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York). If you fail to appear or answer, judgment will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, NEW YORK COUNTY ON \_\_\_\_\_ IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: May 23, 2024  
Brooklyn, New York

T. A. BLACKBURN LAW, PLLC.  
By: *Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.  
Attorney for Plaintiff  
1242 E. 80<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Brooklyn, New York 11236

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

<p>APRIL LAMPROS,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SEAN COMBS, BAD BOY RECORDS, ARISTA RECORDS, a subsidiary of SONY MUSIC ENTERTAINMENT, JOHN and JANE DOES 1-10 and ABC CORPS. 1-10</p> <p style="text-align: center;">Defendants.</p>
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**COMPLAINT**

Plaintiff April Lampros, by and through her attorneys at T. A. Blackburn Law, PLLC., alleges as follows:

**INTRODUCTION**

1. Plaintiff Lampros brings this action seeking injunctive, declaratory, and monetary relief against Defendants in violation of the Victims of Gender-Motivated Violence Protection Law, Gender Motivated Violence Act<sup>1</sup>, N.Y.C. Admin. Code §§ 10-1101, *et seq.* (“VGMVPL”).

2. This cause of action is timely under the Victims of Gender-Motivated Violence Protection Law, Gender Motivated Violence Act, N.Y.C. Admin. Code §§ 10-1101, *et seq* because it arises out of conduct perpetrated against Plaintiff, who was the statutory age or older at the time

<sup>1</sup> The N.Y.C. Victims of Gender Motivated Violence Protection Act (“NYC Gender Motivated Violence Act”) created a lookback window on March 01, 2023, which runs for two years, for survivors of gender-motivated violence, allowing them to sue their abusers regardless of when the abuse occurred. N.Y.C. Admin. Code § 10-1105(a).

The NYC Gender Motivated Violence Act revives any claims against “a party who commits, directs, enables, participates in, or conspires in the commission of a crime of violence motivated by gender has a cause of action against such party in any court of competent jurisdiction.” N.Y.C. Admin. Code § 10-1104. The Appellate Division has held that sexual assault is an act of gender-motivated violence under the law as “Coerced sexual activity is dehumanizing and fear-inducing. Malice or ill will based on gender is apparent from the alleged commission of the act itself. Animus inheres where consent is absent.” *Breest v. Haggis*, 180 A.D.3d 83, 94 (App. Div. 2019).

The above-described conduct of Defendant Combs, including, but not limited to, Defendant Combs’s sexual assault of Plaintiff in New York City, constitutes a “crime of violence” and a “crime of violence motivated by gender” against Plaintiff as defined by the NYC Gender Motivated Violence Act



### JURISDICTION AND VENUE

11. This Court has personal jurisdiction over the Defendant under and consistent with the Constitutional requirements of Due Process in that the Defendant, acting directly or through his agents or apparent agents, committed one or more of the following:

- a. The transaction of any business within the state;
- b. The making of any contract within the state;
- c. The commission of a tortious act within this district and
- d. The ownership, use, or possession of any real estate in this state.

### SUMMARY OF FACTUAL ACCUSATIONS

12. Upon information and belief, Ms. Lampros met Mr. Combs in early 1994 after the birth of his first son, Justin Dior Combs.

13. At the time, Ms. Lampros was a college student at the Fashion Institute of Technology (FIT) studying fashion design and marketing. To impress her, Mr. Combs would often invite her to Bad Boy Recording Studios in New York City.



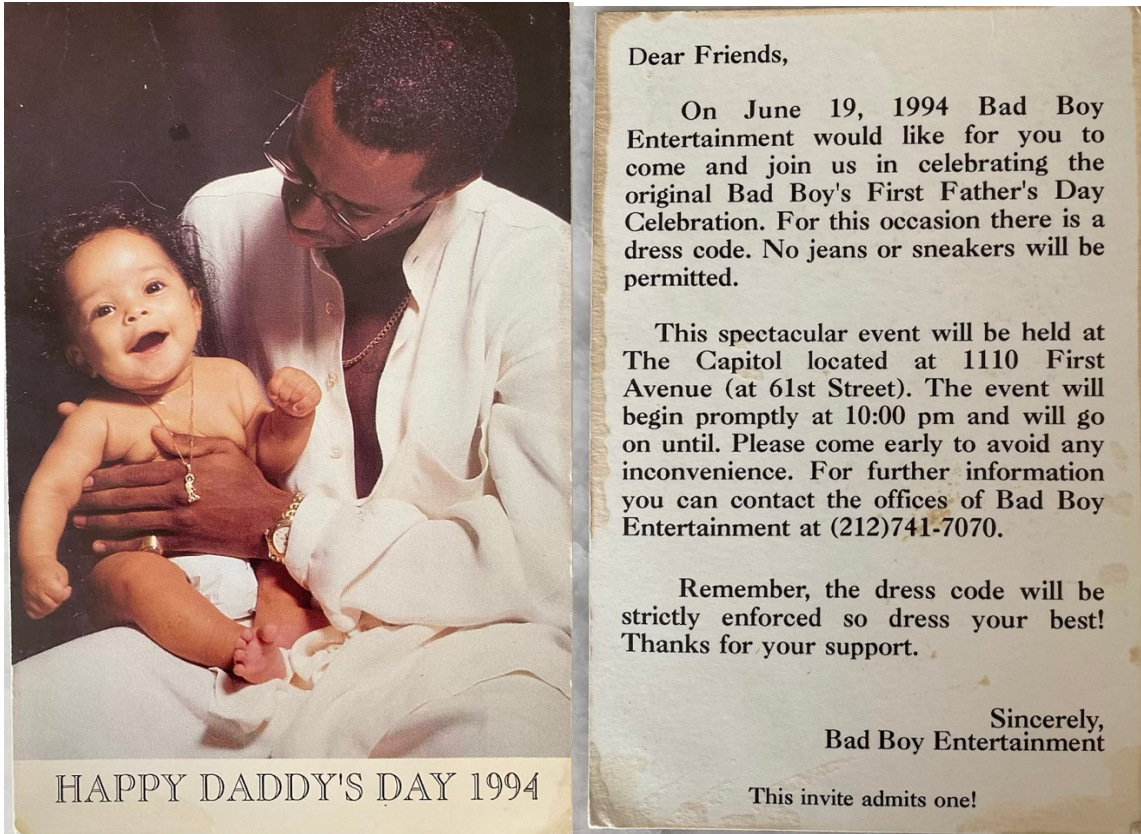
#### **Ms. Lampros, Sean Combs and a Friend in Bad Boy Studios**

14. When she met Mr. Combs, Ms. Lampros shared with him her dreams of working in the fashion industry, and Mr. Combs promised to mentor her and help her by introducing her to music and fashion industry executives as well as assisting her with finding work.

15. Mr. Combs love-bombed her. He showered her with gifts and flowers, as evidenced by one of the cards that accompanied the flowers that Mr. Combs sent Ms. Lampros for Valentine's Day in 1994:

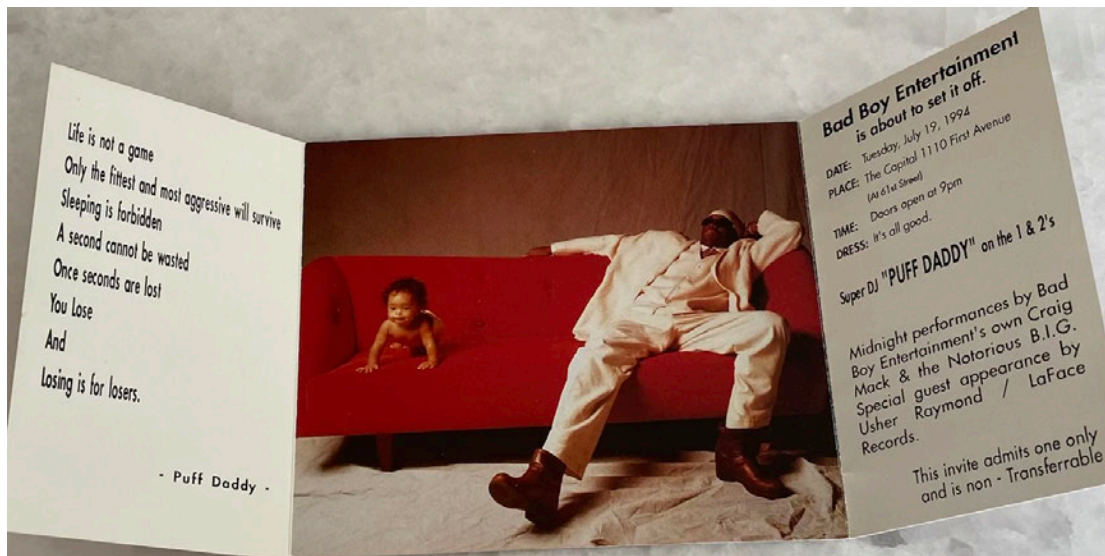


16. Mr. Combs went so far as to invite Ms. Lampros to his first Father's Day celebration. The invitation to that event is below:



**June 19, 1994, Happy Daddy's Day Celebration  
Held at The Capitol Located at 1110 First Avenue (at 61<sup>st</sup> Street)**

17. A month after the Father's Day event, Mr. Combs invited Ms. Lampros to an exclusive Bad Boy Party with performances by Usher, Craig Mack, and The Notorious B.I.G.



**July 19, 1994, Party  
Held at The Capitol Located at 1110 First Avenue (at 61<sup>st</sup> Street)**

18. Upon information and belief, what Mr. Combs displayed as kind gestures quickly manifested into an aggressive, coercive, and abusive relationship based on sex.

19. These acts were not isolated to the state of New York, as Mr. Combs would fly Ms. Lampros to Atlanta to see him, where they would spend time together. Ms. Lampros would also fly to Miami to see Mr. Combs at his home.



#### **Ms. Lampros at Mr. Combs Home in Florida**

20. Upon information and belief, throughout the years with Mr. Combs, there were four terrifying sexual encounters Ms. Lampros endured.

21. According to Ms. Lampros, Mr. Combs had a terrible temper and often threatened to harm her if she failed to do what he said, if he witnessed her talking to other men, or if she failed to take his phone calls.

22. According to Ms. Lampros, she was also not allowed to talk about her relationship with Mr. Combs to anyone because he did not want anyone to know he was seeing her because she is a white woman.

#### **Sexual Assault Encounter #1:**

23. The first horrific sexual encounter occurred in 1995 when Ms. Lampros met up with Mr. Combs in South of Houston Street (SoHo) at a bar. She was introduced to a woman named (REDACTED), and the group lightly drank throughout that evening. At the time, Ms. Lampros was a college student and did not drink any alcohol. Due to Mr. Combs' delusional and violent outbursts, she succumbed to pressure and reluctantly drank with Mr. Combs and (REDACTED).

24. As they drank, Ms. Lampros began to feel uneasy. At this point, she had only had a few sips of one drink. Ms. Lampros and (REDACTED) were guided to a vehicle and left the bar with Mr. Combs.

25. They arrived at the Millennium Hotel. While at the hotel, Ms. Lampros continued to feel uneasy.

26. She recalls feeling like the walls were closing in on her. She was laid on the hotel bed where Mr. Combs forced himself on top of her.

27. Mr. Combs began to kiss Ms. Lampros, and as she turned her head, trying to avoid the interaction, he grabbed her face. Mr. Combs continued to kiss her forcefully.

28. Ms. Lampros informed him that she wasn't feeling well, but he ignored her words and continued to take off her clothing.

29. Ms. Lampros tried to hold onto her clothing, but she felt weak and powerless in this situation.

30. Ms. Lampros pleaded with Mr. Combs to stop, and he ignored her. Ms. Lampros could not process why this was occurring and felt a loss of control.

31. Ms. Lampros was being raped by Mr. Combs, and she soon passed out.

32. The next morning, Ms. Lampros was awoken by the sun peering through the drapes. She was nude, sore, and confused. Ms. Lampros quickly got out of bed, clothed herself, and left the hotel room as fast as she could.

33. Months after the first rape, Mr. Combs pursued Ms. Lampros. He sent her gifts, cards, and flowers and used his power and access to music industry events to lure Ms. Lampros back to him. Ms. Lampros was a hopeful yet naïve college student and took Mr. Combs at his word and believed that the first rape was a possible mulligan and decided to give him a second chance.

34. At the time, Ms. Lampros was a college student in her late teens and early twenties. Her decision to return to Mr. Combs after being raped is indicative of many assault survivors who return to their abusers.

35. Ms. Lampros agreed to meet with Mr. Combs to discuss the business opportunities he promised, as he knew her passion was to pursue a career in fashion and music.

36. They met up and talked near his Manhattan apartment, which was somewhere near 30<sup>th</sup> Street at that time. Ms. Lampros was under the impression that what had occurred months prior between them would not happen again. She was holding onto Mr. Combs' promises of access to his industry to pursue her passion.



37. Mr. Combs was respectful, regained her trust, and used their common interactions with Arista Records (parent company of Bad Boy Records, and Ms. Lampros was an intern at Arista Records). Things seemed to be normal between the two until the second incident of sexual assault.

### **Sexual Assault Encounter #2:**

38. During a second incident of sexual assault, Mr. Combs and Ms. Lampros were in a parking garage near his Manhattan apartment. She believes it was somewhere near 30<sup>th</sup> Street. They were headed to dinner, and Mr. Combs was slightly inebriated.

39. As they headed toward the parking garage, Mr. Combs grabbed Ms. Lampros by the waist and forced her down to her knees. He quickly unzipped his pants, exposing his erect penis. He then grabbed her hair, wrapping it around his fist. He then forced his erect penis into her mouth and demanded Ms. Lampros perform oral sex.

40. As Ms. Lampros' eyes filled with tears, she could see the parking garage attendant witnessing this horrific assault. This had no impact on Mr. Combs. He was blinded by his lustful desire to pleasure himself at Ms. Lampros' expense.

41. When Mr. Combs was done with her, he told her to get up. Ms. Lampros was in shock, morally depleted, embarrassed, and in physical agony because of Mr. Combs violently yanking her down to her knees and pulling her hair.

42. Once again, Ms. Lampros made the decision to distance herself, and once again, Mr. Combs came back with gifts and empty promises.

43. Ms. Lampros was not moved. She had enough and decided to focus on her studies and leave Mr. Combs for good. Unbeknownst to Ms. Lampros, Mr. Combs was not good at accepting rejection. He immediately switched his approach and became angry, threatening, and forceful. He developed this mobster persona, and Ms. Lampros was in fear of him.

44. Mr. Combs began calling Ms. Lampros incessantly and would often call her just to say, "If anyone is in your apartment, I will beat your ass and theirs."

45. Ms. Lampros' reasonable fear of Mr. Combs left her feeling stuck with him and with no way out. He knew where she lived and worked and had connections to ensure her compliance with his demands.

46. She felt that if she disobeyed him, he would take away her dreams of pursuing a career in his world. Mr. Combs would also threaten to blacklist her in the industry if she tried to mess with him in any way. Ms. Lampros' dreams and everything she's been working hard for were in the palm of his hands.

### **Sexual Assault Encounter #3:**

47. One night in 1996, Mr. Combs ordered Ms. Lampros to his Manhattan apartment.

48. Mr. Combs' residence was in the 30s and Park near the Midtown tunnel. When Ms. Lampros arrived, Kim Porter and two other people were present. Mr. Combs introduced the women; they went to a nightclub. After the club closed, they returned to Mr. Combs's apartment, and they began a night of drinking.

49. A couple of hours into the evening, Mr. Combs forced Ms. Porter and Ms. Lampros to take ecstasy. Mr. Combs instructed the women to open their mouths. When they complied with the demand, Mr. Combs forced the pill down their throats to ensure the pills were swallowed. Mr. Combs hands were so far down Ms. Lampros throat she gagged. He even checked under their tongues.

50. With the combination of alcohol and ecstasy, Ms. Lampros recalls feeling lightheaded and lethargic. After being forced to take ecstasy, Mr. Combs then demanded Kim Porter to have sexual intercourse with Ms. Lampros.

51. Ms. Lampros vocally opposed this idea, but Mr. Combs quickly reminded her that she had no control over the situation as he could make her lose her job.

52. Ms. Lampros knew that she had to comply because she had witnessed what happens when someone defies Mr. Combs. She had also been threatened and victimized by Mr. Combs and did not want to cause a problem because she feared him.

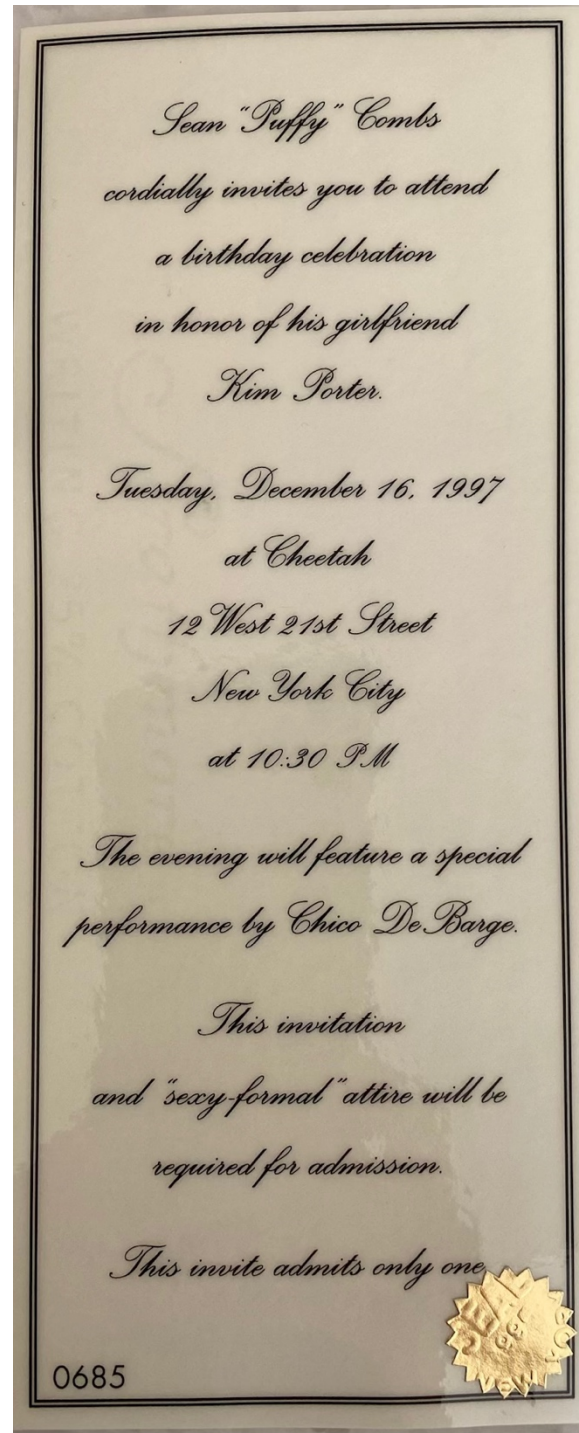
53. As Mr. Combs demanded Ms. Porter and Ms. Lampros to engage in sex, Mr. Combs sat close by, masturbating for some time before pushing Kim Porter off Ms. Lampros and forcing his penis inside of her, and raping her.

54. Ms. Lampros felt numb at that moment and emotionally checked out.

55. A few hours later, Ms. Lampros recalls being woken up by Mr. Combs and told to leave the residence. She felt disgusted, ashamed, and embarrassed and couldn't believe what had happened.

56. Shortly after this event, Ms. Lampros slowly distanced herself from Mr. Combs. Even though she was reluctant to be with him, he used industry connections and invitations to exclusive events to keep her attached.

57. Mr. Combs went so far as to invite her to Kim Porters' birthday celebration.



**End Of The Road:**

58. In or about 1998, Ms. Lampros found the courage to end her relationship with Mr. Combs. She had finally suffered enough.

59. However, this ending was one-sided. Mr. Combs and Kim Porter weren't done with Ms. Lampros. Kim Porter was very resentful of Ms. Lampros after she was forced to engage in sex acts with Ms. Lampros. She dined at Ms. Lampros' place of employment a bar named Sliver, which was in Soho. According to Ms. Lampros, Ms. Porter was enraged when she saw her.

60. According to Ms. Lampros, two days later, Ms. Porter called her employer and complained to the manager, alleging that Ms. Lampros attempted to poison her. She then stated that her boyfriend was Sean Combs and could have the business shut down if he did not immediately terminate Ms. Lampros. Later that evening, the manager told her he had to let her go because Mr. Combs called and demanded that he fire her.

61. Ms. Lampros believes that Ms. Porter got Ms. Lampros fired in retaliation for what Mr. Combs made them do.

62. According to Ms. Lampros, her boss was afraid of Mr. Combs and his contacts and told her he had to do it, or Mr. Combs could risk getting his business closed.

63. Ms. Lampros called Mr. Combs, and he showed no remorse that she was out of a job. In fact, he laughed about it.

64. At the time she ended their relationship, Ms. Lampros recalls Mr. Combs' penis being adolescently in both length and width. She recalls him being circumcised and remembers a tattoo on his chest.

**Sean John Clothing:**

65. While in a relationship with Mr. Combs, Ms. Lampros was a student at FIT. She had a passion for fashion, and Mr. Combs knew this. Mr. Combs promised Ms. Lampros several working opportunities in the fashion and music industry, and the two often discussed his plans to launch his own clothing brand.

66. Within months of Ms. Lampros ending their relationship, Mr. Combs launched Sean John.

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**Sexual Assault Encounter #4:**

67. According to Ms. Lampros, she saw Mr. Combs at an event at Rockefeller Center in or about the end of 2000 towards the beginning of 2001. At the time, Ms. Lampros says Mr. Combs may have been filming a season of Making The Band.

68. According to Ms. Lampros, when Mr. Combs saw her, he approached Ms. Lampros and asked the camera crew to turn off the cameras to not film their interaction.

69. According to Ms. Lampros, Mr. Combs asked her how she was, expressed to her that he missed her, and asked if she would leave the event at Rockefeller Center with him. Ms. Lampros rejected Mr. Combs and left.

70. According to Ms. Lampros, later that evening, he kept calling her and asking if she would come to his apartment on Park Avenue, but she said no. He even offered to send his driver to pick her up. Finally, he offered to come with the driver to pick her up.

71. According to Ms. Lampros, Mr. Combs does not like the word no. He called a few more times, so she stopped answering the phone.

72. According to Ms. Lampros, a few days later, he called again, begging to see her. Reluctantly and regrettably, she allowed him to come over to her apartment located at 477 Central Park West to hear what he had to say. Ms. Lampros figured it was during the day and doubted that he would try to harm her.

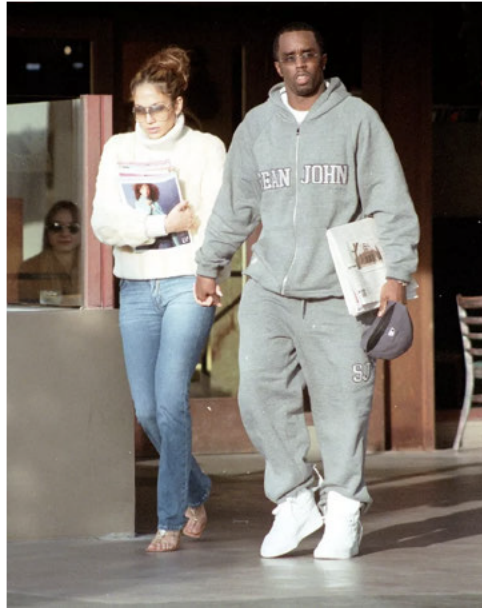
73. According to Ms. Lampros, when she opened the door, his security was sitting on the stairwell. Knowing that security was there made Ms. Lampros feel a little better about letting him in. They sat on her couch and began talking.

74. According to Ms. Lampros, Mr. Combs began apologizing for his past behaviors; he started telling her that he was a changed man. He then showered her with compliments, telling her how good she looked and kept reminiscing about their prior sex life. He then began dropping hints about them having sex. Ms. Lampros rejected his advances.

75. Suddenly, out of nowhere, Mr. Combs violently grabbed her and forced himself onto her. He began kissing her and touching her against her will.

76. At that point, Ms. Lampros fought him off after she quickly realized it was a big mistake to have allowed him to visit her. She told him to leave, as she felt that he just wanted to use her for sex and hadn't changed at all.

77. Even more disgusting was the fact that Ms. Lampros knew that Mr. Combs was involved in a very public relationship with Jennifer Lopez.

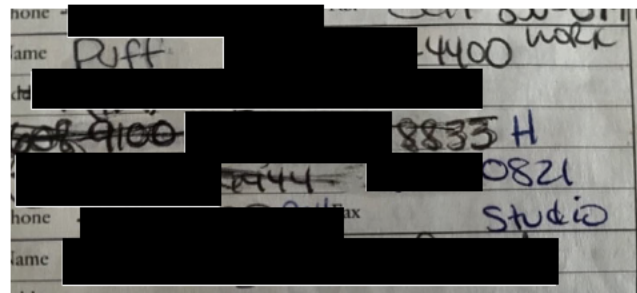


**Jennifer Lopez and Sean Combs**

78. According to several media reports from that time, Mr. Combs ended his relationship with Jennifer Lopez due to infidelity in February 2001<sup>2</sup>. This was around the same time that Mr. Combs sexually assaulted Ms. Lampros.

79. Luckily for Ms. Lampros the couch was right near the door of the apartment, so it was easy for her to reach for the door, open it, and demand for him to leave. She ensured that his security could hear her telling him to exit. She was afraid that Mr. Combs would have raped her, as he does not take no for an answer, and had a history of violently handling her and forcing her to perform oral on him.

80. Ms. Lampros is in possession of several of Mr. Combs phone numbers throughout the years:



<sup>2</sup> <https://people.com/music/diddy-posts-throwback-snap-with-ex-jennifer-lopez/>

**Ms. Lampros Discovered That Mr. Combs Recorded And Disclosed A Tape Of Him Having Sex With Her:**

81. According to Ms. Lampros, in or about 2023, Ms. Lampros was at a function, and a gentleman (REDACTED) informed the man Ms. Lampros was dating that he should reconsider dating her because he personally saw a video of her and Sean Combs having sex.

82. According to Ms. Lampros, (REDACTED) shared that he saw the tape during the summer of 1997. According to Mr. Lampros, she was told that Mr. Combs apparently recorded them having sex without her knowing and showed it to multiple people.

**FIRST CAUSE OF ACTION****Battery**

83. Ms. Lampros incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

84. The defendant committed battery against Ms. Lampros when he penetrated Ms. Lampros orally and vaginally against her will, as detailed in the four encounters above.

85. In addition, Ms. Combs physically assaulted Ms. Lampros when he pulled her hair and forced her to perform oral sex on him in an open parking garage with the parking attendant watching.

86. Defendant Combs intentionally, and without her consent, attacked Ms. Lampros to satisfy his sexual desires. Under all circumstances, the defendants' physical contact with Ms. Lampros was offensive and wrongful. Defendant Combs continued to attack Ms. Lampros despite her attempts to thwart his actions.

87. The Defendant's conduct was the direct and proximate cause of Ms. Lampros' past and future substantial damages, including significant pain and suffering, lasting psychological and financial harm, loss of dignity, and invasion of privacy.

88. The Defendant's actions constitute sexual offenses as defined in Article 130 of the New York Penal Law, including but not limited to sexual misconduct (§130.20) and forcible touching (§ 130.52).

89. The Plaintiff's claim for battery is thus timely under the Gender Motivated Violence Act, N.Y.C. Admin. Code §§ 10-1101, *et seq.*

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**SECOND CAUSE OF ACTION****Assault/Sexual Assault**

90. Ms. Lampros incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

91. As described above, Defendant Combs frightened and placed Plaintiff in apprehension of harm when he physically assaulted her within the City of New York.

92. Defendant forcibly touched and attempted and/or threatened to touch Plaintiff's intimate areas and/or touch her with his intimate body parts.

93. As a result of Defendant Combs' conduct, Plaintiff has suffered and continues to suffer harm, including physical injury, severe emotional distress, humiliation, anxiety, and other consequential damages for which she is entitled to an award of monetary damages and other relief.

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

95. This cause of action is timely under the Gender Motivated Violence Act, N.Y.C. Admin. Code §§ 10-1101, *et seq.*

**THIRD CAUSE OF ACTION****Negligent Infliction Of Emotional Distress**

96. Ms. Lampros incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

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

98. The Plaintiff's emotional distress was foreseeable to the Defendants.

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

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



101. This cause of action is timely under the Adult Survivors Act, N.Y. C.P.L.R. § 214-j (McKinney 2022) because it arises out of conduct perpetrated against Plaintiff, who was the statutory age or older at the time of the conduct, which constitutes multiple sexual offenses as defined Article 130 of the New York Penal Law (“Article 130”).

#### **FOURTH CAUSE OF ACTION**

##### **Violation of the Victims of Gender-Motivated Violence Protection Law, N.Y.C. Admin. Code §§ 10-1101, *et seq.* (“VGMVPL”) *Against All Defendants***

102. Ms. Lampros incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

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

104. Defendant SME and their subsidiary AR enabled Mr. Combs to commit the crime of violence motivated by gender and are therefore also liable under the VGMVPL.

105. As detailed above, Ms. Lampros worked for Arista Records during Mr. Combs’ assault. Bad Boy Records was a subsidiary of Arista Records. At the time, Ms. Lampros reported to her manager, Jeff<sup>3</sup>, who was an agent of Arista Records.

106. Defendants AR and SME enabled Mr. Combs’ commission of the crimes of violence motivated by gender, and thus, are liable under the NYC Victims of Gender-Motivated Protection Act.

107. Defendants AR and SME enabled or participated in the sexual abuse of Plaintiff because Defendants failed to, among other things, protect Plaintiff from a known danger; have

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<sup>3</sup> Presently, Ms. Lampros does not recall Jeff’s last name, but we are in the process of locating it. Once we learn his name, we will amend the pleading.

sufficient policies and procedures in place to prevent sexual assault; properly implement policies and procedures to prevent sexual assault; take reasonable measures to ensure that policies to prevent sexual assault were working; train their employees on identifying sexual assault and inappropriate workplace behaviors; protect their employees from sexual assault; and adhere to the applicable standard of care.

108. Defendants Arista Records enabled or participated in the sexual abuse of Plaintiff because Defendants failed to timely and properly educate, train, supervise, and/or monitor their agents or employees regarding policies and procedures that should be followed when sexual abuse is suspected or observed.

109. Prior to Combs sexually assaulting Plaintiff, Arista Records knew or should have known that Combs was not fit to be in a position of authority. Defendants, by and through their agents, servants and/or employees, became aware, or should have become aware of Combs' propensity to commit sexual assault and of the risk to Plaintiff's safety. At the very least, Defendants knew or should have known that they did not have sufficient information about whether or not their leaders, managers, and people were safe to be in positions of power.

110. Defendant Arista Records knew or should have known that Combs posed a risk of sexual assault. Defendant Arista failed to properly supervise Combs and protect Plaintiff from a known danger, thereby enabling Combs' repeated sexual assaults on Plaintiff.

111. Defendant Arista Records negligently deemed Mr. Combs was fit to be in a position of authority; and/or that any previous suitability problems Mr. Combs had were fixed and cured; and/or that Mr. Combs would not commit acts of sexual assault; and/or that Mr. Combs would not injure others.

112. Moreover, Defendant Arista Records enabled the sexual abuse of Plaintiff by actively maintaining and employing Mr. Combs in a position of power and authority through which Mr. Combs had control over people, including Plaintiff.

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

114. The above-described conduct of Defendants constitutes a sexual offense as defined in Article 130 of the New York Penal Law.

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

#### **PRAYER FOR RELIEF**

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

- a. For a money judgment representing compensatory damages, including consequential damages, lost wages, earnings, and all other sums of money, together with interest on these amounts, according to proof;
- b. For a money judgment for mental pain and anguish and severe emotional distress, according to proof;
- c. For punitive and exemplary damages according to proof;
- d. For attorney’s fees and costs;
- e. For prejudgment and post-judgment interest; and
- f. Such other and further relief as the Court may deem just and proper.

#### **JURY DEMAND**

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

Dated: May 23, 2024  
Brooklyn, New York

T. A. BLACKBURN LAW, PLLC.  
By: *Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.  
Attorney for Plaintiff  
1242 E. 80<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Brooklyn, New York 11236

**SUPREME COURT OF THE STATE OF NEW YORK  
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Plaintiff,

v.

SEAN COMBS,  
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ARISTA RECORDS, a subsidiary of  
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JOHN and JANE DOES 1-10 and  
ABC CORPS. 1-10

Defendants.

Case Number:

**Plaintiff Designates  
New York County is the  
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**Attorney Verification**

To the above-named Defendant (s):

TYRONE A. BLACKBURN, an attorney duly admitted to practice in the Courts of New York State and a member of the firm T. A. Blackburn Law, PLLC., attorneys for the plaintiffs in this action, affirms under penalty of perjury, That he has read the Complaint and knows the contents thereof and that the same is true to his knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters, he believes it to be true. The sources of his information and knowledge are investigations and records in the file. This verification is made by affirmation and not by the plaintiffs because the Plaintiffs are not within the County where the attorney has his office.

Dated: May 23, 2024  
Brooklyn, New York

T. A. BLACKBURN LAW, PLLC.  
By: *Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.  
Attorney for Plaintiff  
1242 E. 80<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Brooklyn, New York 11236

## PRESERVATION NOTICE

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

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

### Electronically Stored Information:

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

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

### Paper Information:

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

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

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

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

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

Dated: May 23, 2024  
Brooklyn, New York

T. A. BLACKBURN LAW, PLLC.  
By: *Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.  
Attorney for Plaintiff  
1242 E. 80<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Brooklyn, New York 11236

#### **DEMAND FOR INSURANCE COVERAGE**

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

Dated: May 23, 2024  
Brooklyn, New York

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