

FILED
10/8/2020 11:53 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2020L010738

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

SAMANTHA TAVEL A/K/A CANDY
CARTWRIGHT,

Plaintiffs,

v.

MATT RIDDLE; WORLD WRESTLING
ENTERTAINMENT INC.,; EVOLVE
WRESTLING, INC., AND GABE
SAPOLSKY

Defendants.

Case No.

COMPLAINT AT LAW

NOW COMES the plaintiff, Samantha Tavel a/k/a Candy Cartwright, by and through her attorneys Hale & Monico, and for her Complaint at Law against Defendants, Matt Riddle, World Wrestling Entertainment Inc., (hereinafter referred to as “WWE”), Evolve Wrestling Inc.,(hereinafter referred to as “Evolve”) and Gabe Sapolsky, states as follows:

PARTIES

1. On before, and after, May 19, 2018, defendant, World Wrestling Entertainment, Inc., (hereinafter referred to as “WWE”), was a media and entertainment company incorporated in the State of Delaware.
2. On before, and after, May 19, 2018, defendant, WWE, was a corporation qualified to do business as a corporation in the State of Illinois and is presently active with the Illinois Secretary of State Corporation Division.

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3. On before, and after, May 19, 2018, defendant WWE was primarily known for professional wrestling.
4. On before, and after May 19, 2018, defendant WWE conducted business in the State of Illinois and Cook County, Illinois.
5. On before, and after May 19, 2018, defendant WWE was actively involved in the conduct of business of Evolve.
6. On before, and after May 19, 2018, defendant WWE and its representatives acted as agents of defendant Evolve.
7. On before, and after May 19, 2018, defendant WWE had control of the events conducted by defendant, Evolve.
8. On before, and after May 19, 2018, defendant WWE provided rules for which defendant, Evolve's, agents had to comply with.
9. On before, and after May 19, 2018, defendant Evolve Wrestling Inc. was a Florida Corporation.
10. On before, and after May 19, 2020, defendant Gabe Sapolsky was a co-founder of Evolve.
11. On before, and after May 19, 2020, defendant Gabe Sapolsky was enacting rules for the professional wrestlers at Evolve at the direction of the WWE and Vince McMahon.
12. On before, and after May 29, 2018, defendant Gabe Sapolsky was acting as an agent and/or employee of the WWE.
13. On before, and after May 29, 2018, defendant Gabe Sapolsky was acting as an agent and/or employee of Evolve.
14. On before, and after May 19, 2018, defendant Matt Riddle was a professional wrestler employed by defendants, WWE and Evolve.

15. At all times relevant, defendant Matt Riddle was acting as an agent and/or employee of the WWE and Evolve.

BACKGROUND

16. WWE and Evolve host events for professional wrestling. Historically, professional wrestling has been a male dominated sport. In recent years, females have begun to perform for WWE and Evolve.

17. Female performers perform in lingerie, and are held to different beauty standards than male performers. Female performers also make less money than male performers and experience more hurdles in their career advancement.

18. The culture of professional wrestling is dangerous for women. The culture, created by WWE and Evolve, hypersexualizes female performers and profits from male aggression. In the past six months there have been multitudes of allegations of sexual assault perpetrated on female performers by male performers that WWE and Evolve allowed and tacitly encouraged.

19. Plaintiff Samantha Tavel was one such victim of instances of sexual assault by male performer Matt Riddle.

FACTS

20. On before, and after May 19, 2018, Plaintiff, Samantha Tavel a/k/a Candy Cartwright, was an independent contractor performing work as a professional wrestler and social media ambassador for Evolve.

21. In April of 2017, defendant, Matt Riddle, began sexually assaulting Plaintiff by forcing himself on her and penetrating her with his penis while in a vehicle in the parking lot after a wrestling event promoted by Evolve.

22. Defendant Matt Riddle then bragged to other employees of Evolve, including defendant, Gabe Sapolsky, that he forced himself on the Plaintiff and sexually assaulted her, and this was done without her consent.
23. Matt Riddle experienced no adverse employment action or discipline from Gabe Sapolsky, Evolve, or the WWE even though he had committed acts of sexual assault without Plaintiff's consent.
24. Gabe Sapolsky, Evolve and WWE tacitly approved of Matt Riddle's sexual violence towards the Plaintiff.
25. Defendants' tacit approval of this conduct by Matt Riddle, combined with the toxic misogynistic culture created by Defendants, allowed, encouraged and aided Matt Riddle to continue this behavior towards the Plaintiff.
26. On or about May 19, 2018, defendant, Evolve, hosted a professional wrestling event in Summit, Illinois, Cook County.
27. On or about May 19, 2018, after the Evolve event, defendant, Matt Riddle, forced the Plaintiff to perform oral sex on him by choking the plaintiff, in front of other members of Evolve while on a bus leaving the event in Summit, Illinois.
28. Upon information and belief, defendant, WWE, has a history of condoning sexual assault.
29. Upon information and belief, defendant, WWE, has condoned sexual assault in the workplace for over 30 years.
30. Defendant, Matt Riddle, Individually, and acting as an agent and/or employee of the WWE and Evolve continued to force the Plaintiff to perform sexual acts on him under the threat that if the Plaintiff did not, she would not be booked for any further shows.
31. On or about January 31, 2020, Plaintiff had bookings with the WWE and Evolve.

32. At the aforementioned time and date, Plaintiff refused to continue to be forced to perform sexual acts on defendant, Matt Riddle.
33. On the aforementioned time and date, Plaintiff was told her future bookings with the WWE and Evolve were terminated due to “issues with the talent.”
34. Upon information and belief, defendant, Matt Riddle, had informed the WWE and Evolve that he did not want her working with the WWE and Evolve due to Plaintiff no longer performing forced sexual acts on him. Meanwhile, Matt Riddle continued to perform for the WWE and Evolve, to this date.
35. Defendants WWE, Evolve, and Gabe Sapolsky, continued to tacitly approved of defendant, Matt Riddles’ conduct, and assisted and encouraged his behavior by removing the Plaintiff from future bookings with the WWE and Evolve.

COUNT I -Gender Violence Act- Matt Riddle

- 1-35. Plaintiff realleges and adopts paragraphs one through thirty-five (1-35) of this complaint at law as though fully stated and pled herein.
36. On before and after May 19, 2018, defendant, Matt Riddle had a duty of ordinary care so as to avoid causing injury and/or harmful or offensive contact to the plaintiff, Samantha Tavel, including acts of gender violence.
37. On before, and after the aforementioned date, defendant, Matt Riddle, had duty to refrain from tortious conduct against the Plaintiff.
38. Pursuant to 740 ILCS 82/5, defendant, Matt Riddle had a duty to refrain from committing acts of gender violence.
39. In violation of the aforementioned duties, the defendant, Matt Riddle, perpetrated gender violence against the Plaintiff in one or more of the following ways:

- a. Forcefully penetrated the Plaintiff with his penis without her consent;
 - b. Forced the plaintiff to perform sexual acts on him with threats and physical harm;
and
 - c. Forced the plaintiff to perform sexual acts on him with the threat of her losing her job.
40. As a proximate result of the foregoing acts or omissions, the Plaintiff was sexually assaulted and suffered physical and emotional injuries.

WHEREFORE, plaintiff, Samantha Tavel demands judgment against Defendant, Matt Riddle, for an amount in excess of \$10,000,000.00 including but not limited to actual damages, damages for emotional distress, punitive damages, attorney's fees and costs.

COUNT II- Gender Violence Act- World Wrestling Entertainment Inc.

- 1-35. Plaintiff realleges and adopts paragraphs one through thirty-five (1-35) of this complaint at law as though fully stated and pled herein.
36. On and before the aforementioned dates, the Defendant WWE had a duty of ordinary care so as to avoid causing injury and/or harmful or offensive contact to the plaintiff, Samantha Tavel, including acts of gender violence.
37. On and before the aforementioned dates, the Defendant WWE had a duty to refrain from assisting and encouraging tortious conduct of the assailant, Matt Riddle, against the Plaintiff.
38. Pursuant to 740 ILCS 82/5, Defendant WWE had a duty to refrain from encouraging or assisting acts of gender violence.
39. In violation of the aforementioned duties, the Defendant WWE by and through its agents and/or employees perpetrated gender violence against the Plaintiff by encouraging or assisting in gender violence in one or more of the following ways:

- a. Allowed, encouraged or permitted the defendant, Matt Riddle, to commit gender violence acts against the Plaintiff;
- b. Knew or should have known that the defendant, Matt Riddle, had a propensity to commit such acts;
- c. Knew or should have known that Gabe Sapolsky, knew, and encouraged these sexual acts committed by Matt Riddle; and
- d. Created an atmosphere of toxic misogyny that encourages gender violence.

40. As a proximate result of the foregoing acts or omissions, the Plaintiff was sexually assaulted and suffered physical and emotional injuries.

WHEREFORE, plaintiff, Samantha Tavel, demands judgment against Defendant, WWE, for an amount in excess of \$10,000,000.00 including but not limited to actual damages, damages for emotional distress, punitive damages, attorney's fees and costs.

COUNT III – Gender Violence Act- Evolve Wrestling, Inc.

1-35. Plaintiff realleges and adopts paragraphs one through thirty-five (1-35) of this complaint at law as though fully stated and pled herein.

36. On and before the aforementioned dates, the Defendant Evolve had a duty of ordinary care so as to avoid causing injury and/or harmful or offensive contact to the plaintiff, Samantha Tavel, including acts of gender violence.

37. On and before the aforementioned dates, the Defendant Evolve had a duty to refrain from assisting and encouraging tortious conduct of the assailant, Matt Riddle, against the Plaintiff.

38. Pursuant to 740 ILCS 82/5, Defendant Evolve had a duty to refrain from encouraging or assisting acts of gender violence.

39. In violation of the aforementioned duties, the Defendant Evolve and through its agents and/or employees perpetrated gender violence against the Plaintiff by encouraging or assisting in gender violence in one or more of the following ways:

- a. Allowed, encouraged or permitted the defendant, Matt Riddle, to commit gender violence acts against the Plaintiff;
- b. Knew or should have known that the defendant, Matt Riddle, had a propensity to commit such acts;
- c. Knew or should have known that Gabe Sapolsky encouraged these sexual acts;

d. Created an atmosphere of toxic misogyny that encourages gender violence.

40. As a proximate result of the foregoing acts or omissions, the Plaintiff was sexually assaulted and suffered physical and emotional injuries.

WHEREFORE, plaintiff, Samantha Tavel, demands judgment against Defendant, Evolve, for an amount in excess of \$10,000,000.00 including but not limited to actual damages, damages for emotional distress, punitive damages, attorney's fees and costs.

COUNT IV- Gender Violence Act- Gabe Sapolsky

1-35. Plaintiff realleges and adopts paragraphs one through thirty-five (1-35) of this complaint at law as though fully stated and pled herein.

36. On and before the aforementioned dates, the Defendant Gabe Sapolsky had a duty of ordinary care so as to avoid causing injury and/or harmful or offensive contact to the plaintiff, Samantha Tavel, including acts of gender violence.

37. On and before the aforementioned dates, the Defendant Gabe Sapolsky had a duty to refrain from assisting and encouraging tortious conduct of the assailant, Matt Riddle, against the Plaintiff.

38. Pursuant to 740 ILCS 82/5, Defendant Gabe Sapolsky had a duty to refrain from encouraging or assisting acts of gender violence.

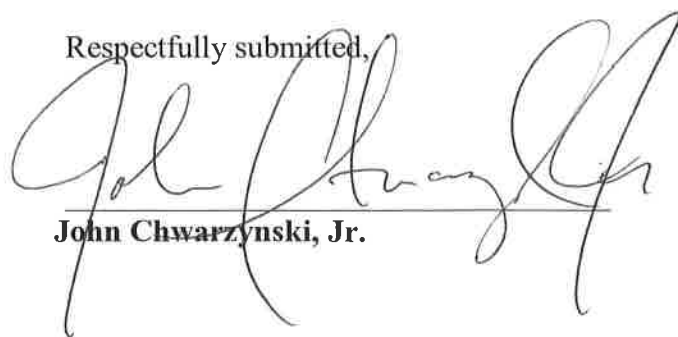
39. In violation of the aforementioned duties, the Defendant Gabe Sapolsky by and through its agents and/or employees perpetrated gender violence against the Plaintiff by encouraging or assisting in gender violence in one or more of the following ways:

- a. Allowed, encouraged or permitted the defendant, Matt Riddle to commit gender violence acts against the Plaintiff;
- b. Knew or should have known that the defendant, Matt Riddle had a propensity to commit such acts; and
- d. Created an atmosphere of toxic misogyny that encourages gender violence.

40. As a proximate result of the foregoing acts or omissions, the Plaintiff was sexually assaulted and suffered physical and emotional injuries.

WHEREFORE, plaintiff, Samantha Tavel, demands judgment against Defendant, Gabe Sapolsky, for an amount in excess of \$10,000,000.00 including but not limited to actual damages, damages for emotional distress, punitive damages, attorney's fees and costs.

Respectfully submitted,



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